

A STRONG AND HEALTHY START

School Nutrition Programs During COVID-19 – Fall 2020

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Purpose

This guidance document includes current non-health related requirements and best practices for public and independent schools operating the federal child nutrition programs in Vermont. For all health and safety guidance, please refer to the most recent version of [A Strong and Healthy Start: Safety And Health Guidance for Vermont Schools](#).

During Spring 2020, Vermont Schools and non-profit sponsors were able to offer free meals to all children 18 and under using the USDA’s Summer Food Service Program (SFSP) during an unanticipated school closure. This option continued under the regular SFSP for Summer 2020. However, USDA had issued a series of waivers that allowed these meals to be served in this manner. USDA is not extending these waivers for SFSP, so the SFSP must cease when instructional activities resume in Vermont on Sept. 8, 2020.

USDA guidance is clear that schools must return to using the regular school nutrition programs to feed enrolled students, regardless if students are present at school, or are receiving instruction remotely. USDA has issued a series of nationwide waivers and the State agency has received additional state waivers to allow for flexibility in operation of the school nutrition programs. This guidance outlines how regular school nutrition programs should operate given the constraints of COVID-19 and the flexibilities and waivers that USDA has granted to continue operating these programs.

Requirements to Offer Meals

16 V.S.A. section 1264(a)(1) requires that public schools provide meals to “each attending student every school day.” The Agency of Education’s guidance on [Hybrid Learning During the 2020-2021 School Year](#) addresses how schools may count “school days” and “attendance” for students who are learning remotely while school is in session at school. The combination of this guidance and state statute means that schools will need to make school meals available to all students who are considered to be in attendance for each day that the school is considered to be in session – regardless of whether students are physically at the school building. Schools who are operating 100% remotely, or who are operating a hybrid model with students learning remotely on some school days will need to make meals available to these students. Students are not required to take the meals.

Schools may meet this requirement in one or more of the following ways:

- Make meals available for pick-up at the school, or at other locations through a Grab-n-Go model
- Deliver meals to students either at bus stops or at their homes
- Send meals home with students for remote learning days on days they attend in-person instruction
- Enter into an agreement with another School Food Authority (SFA) to offer meals to these students in one of the above ways

The USDA has issued three waivers which allow meals to be provided to students in these ways:

- **Meal Times Waiver:** A waiver allowing meals to be served to children outside traditional meal times to maximize flexibility for meal pick-up. This waiver allows for multiple meals and multiple days' worth of meals to be provided at the same time. [\[Extension\]](#) [\[Extension 2\]](#)
- **Non-congregate Feeding Waiver:** A waiver allowing meals to be served in non-group settings to support social distancing. [\[Extension\]](#) [\[Extension 2\]](#) [\[Extension 3\]](#)
- **Parent/Guardian Meal Pick-Up Waiver:** A waiver allowing parents/guardians to pick-up meals and bring them home to their children. [\[Extension\]](#) [\[Extension 2\]](#) [\[Extension 3\]](#)

The State agency has accepted these waivers for Vermont, and no further action is needed by SFAs to opt-in to these waivers.

Please note that if the day is not considered to be a "day of operation" (for example, holidays or weekends that are not counted as a "school day") the school nutrition programs may not be offered. However, Child and Adult Care Food Program (CACFP) At-Risk After School Meals may be offered on non-school days if the SFA participates in that program and offers in-person or virtual enrichment activities to cover those days. Please see the section on [CACFP At-Risk After School Meals](#) for more information.

Independent Schools Offering the Federal Child Nutrition Programs

16 V.S.A. section 1264(a)(1) does not apply to Independent Schools. Some Independent Schools in Vermont do participate in the federal child nutrition programs. USDA has clarified in Question 1 of [Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 - #5](#) that if a school participating in the federal child nutrition programs chooses to use the non-congregate feeding waiver to offer meals to any of their students, then meals must be offered to every enrolled student whether they attend instruction virtually or in-person.

Preventing Overt Identification

It is critically important that no matter how meals are offered to students, it is done in a way that prevents overt identification of children who qualify for free or reduced-price meals. This means that meals must be made available to students regardless of their eligibility status. It is not acceptable to make meals available only to students who qualify for free and reduced meals.

In pricing programs, households who do not qualify for free and reduced-price meals will be charged for these meals.

SFAs must take steps to ensure that students' eligibility status is not disclosed at any point in the process. In practice, this means:

- If delivery of meals is provided, it must be available to all households who request it, regardless of eligibility status.
- Any time meals are handed to students, all students must be given the option to take the meals. Free and reduced eligible students may not be separated out to receive meals.
- Rosters provided to classroom teachers, delivery drivers or other staff who are conducting meal counting activities may not identify the student's eligibility status.
- All announcements and notifications to households about the availability of meals should make it clear that meals are available to all students. Schools may note that households who are not eligible for free and reduced-price meals will be charged for the meals.

Note: If any practices around charging and billing for meals will be altered as a result of COVID-19, the SFA's meal charge policy may need to be updated.

Options for Offering Free Meals to All Students

SFAs may decide to operate a non-pricing program during SY20-21 to offer meals at no charge to all students. If the SFA elects to operate in this manner, a source of non-federal funds must be identified to cover the costs that would have been charged to paid-status households. High poverty schools may use the Community Eligibility Provision (CEP) to offer meals at no charge. All schools may use Provision 2 to offer breakfast or both breakfast and lunch at no charge. All schools may also choose to operate a non-pricing program for either or both meals. In any of these options, it is critical that the school identify the non-federal source of funds to be used to pay for the paid student share of the meals. For a basic comparison of these options, see [The FRAC Factsheet on Offering Free Breakfast to all Students](#).

CEP and Provision 2

Both of these options require certain paperwork to be filed with the State agency and allow the school to start a multi-year cycle during which free and reduced meal applications do not need to be collected in future years. However, the SFA may decide to end their cycle early at any point.

For more information on these two options, you may view a one-hour webinar, [Universal Meals: Understanding the Basics of CEP and Provision 2](#), or refer to [Community Eligibility Provision Planning and Implementation Guidance](#) and [USDA's Provision 2 Guidance](#).

Deadlines for CEP and Provision 2 in SY20-21

USDA has issued a waiver extending CEP deadlines for SY20-21. This waiver allows direct certification data from any point between April 1 – June 30, 2020, to be used to qualify the school or group of schools, and an extension of the letter of intent deadline to August 31, 2020.

For Provision 2, the last day schools who choose to begin offering this option is October 1, 2020.

Please reach out to AOE Child Nutrition Programs for guidance as soon as the SFA or school is considering one of these two options.

Non-Pricing Program

Instead of doing the formal CEP or Provision 2 programs, schools also have the option to decide not to charge for breakfast, lunch or both meals. As with CEP and Provision 2, a source of non-federal funds to make up the paid student share of costs needs to be identified. Meals should still be claimed by student status, but paid children would not be charged. If the SFA is going to operate a non-pricing program, they should do so for all students of the school, whether remote or in-person. The SFA will need to update their paid price for each site in the CNP Web system and amend their meal charge policy and free and reduced policy statement to reflect this change. The SFA may return to being a charging program at any point in the year by changing all of these pieces back. There is no deadline to switch to being a non-pricing program – the SFA may make these changes at any point in the year.

The disadvantage of this option, rather than Provision 2, is that it does not allow the SFA to use this year's data to set claiming percentages for future years, so applications will still need to be collected in future years.

After School Meals at No Charge

There are some options to offer after school meals and snacks to children at no charge, even when charging for breakfast and lunch. Please see the [After School Meals Options](#) section for more information on this option.

Start of Year Communication with Households

It is important to communicate to households at the start of the school year that things will be changing with regard to the meals program, and that meals will no longer be provided at no charge to all children 18 and under as they were at the end of last school year and over the summer. If the program is returning to a pricing program, notify households that students who do not qualify for free and reduced meals will still be able to receive meals, however the household will be charged for those meals. Regardless of whether the program will be pricing or will be offering Universal Meals, it's important to notify parents that meals will no longer be available to children who are not enrolled in school (such as younger siblings), unless the household wishes to purchase those meals at the adult meal rate. As always, schools should provide free and reduced meal applications and the meal charge policies to all households at the start of the school year.

SFAs are encouraged to consider using electronic free and reduced meal applications to reduce the amount of physical paperwork going back and forth between home and school. The State agency will need to approve any electronic application before issuance, as these do not follow the state's prototype application. For approval, please email a link to the electronic application to a Child Nutrition team staff member and change the SFA's application in the CNPWeb system to indicate that the prototype application will not be used. Please be aware that if an electronic application is used, SFAs must still provide a way for households to request a paper version of the application.

Flexibilities of Program Requirements for SY20-21

Meal Pattern Flexibilities for SY20-21

USDA has extended and expanded a nationwide [Meal Pattern Waiver](#) that allows State agencies the flexibility to approve meal pattern waiver requests from SFAs when a COVID-related reason prevents the SFA from adhering to the child nutrition program meal patterns. This is not a blanket waiver and will be approved on a case-by-case basis. SFAs must submit waiver requests to the State agency for the specific flexibility needed. SFAs must send a brief email to the appropriate Child Nutrition team member describing which aspect of the meal pattern the SFA is requesting to be waived, how long the waiver will be in effect, and the reason for the request. This reason must specifically be related to impacts that COVID has had on the program's ability to offer meals within the meal pattern. The State agency will use this authority to consider the following waiver requests:

- Requests to waive the requirement to offer milk choice
- Requests to waive age/grade group serving size requirements
- Limited requests to waive vegetable subgroup requirements.
 - Note: All SFAs should attempt to offer a variety of vegetables over the course of the week, however hybrid schedules may make it difficult to show that each student was offered all the subgroups over the course of the week. The State agency will consider these requests under those circumstances.
- Request to waive the recently re-imposed Tier 2 sodium requirements and prohibition on 1% flavored milk (as described in Question 7 and 8 of the [Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 - #5](#)), if procurement and menu planning for SY20-21 has already been conducted.
 - Note: The State agency will not be considering requests to waive the re-imposed whole grain-rich requirements as these requirements were not rolled back in Vermont.

The USDA has not given the State agency authority to waive the NSLP/SBP meal patterns or to substitute and use the SFSP meal pattern. The State agency has applied for a waiver allowing any child nutrition meal pattern to be used – however, at this time, the USDA has not acted on this waiver.

Offer Vs. Serve

Offer versus Serve (OVS) is a provision in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) that allows students to decline some of the meal components offered, with the exception of the required ½ cup of fruit or vegetable. The goal of OVS is to reduce food waste by permitting student to decline food and have ownership over the meals they select. Programs serving high school students are required to utilize OVS for lunch, and it is encouraged for other age groups. However, for SY20-21, USDA has provided a [nationwide waiver of the requirement to utilize OVS for high school students at lunch](#). SFAs who will be changing their use of OVS should indicate so in questions A3 and B3 of their site applications in CNP Web system. No other action is needed to use this waiver.

SFAs who will not be using OVS are reminded that they will need to provide the full serving sizes of all components to all students as part of a unitized meal, unless they request a meal pattern waiver from the State agency. It is not an option to only allow students to decline milk, or fruits and vegetables. Please be aware that this may lead to more food waste.

Schools may also consider creative ways of continuing to implement OVS by allowing students to pre-order the components of the meal. Some vendors are offering online meal ordering software that accommodates OVS ordering. Some schools have created webforms or document templates to allow teachers to take pre-orders of meals in ways that allow for OVS. Meal counts can not be based off of pre-order numbers. Point of Service (POS) meal counts must be conducted. Please see the [POS section](#).

Bulk Meals

Instead of offering individual unitized meals to remote learners, SFAs have the option to provide bulk meals. For example, a family sized box of cereal, ½ gallon of milk and a variety of fresh fruits could be provided for a weeks' worth of breakfasts. SFAs providing bulk meals must include the required food components in the proper minimum amounts for each reimbursable meal being claimed. USDA's guidance on [Seamless Summer Option: Providing Multiple Meals at a Time During the Coronavirus \(COVID-19\) Pandemic](#) includes menu suggestions for offering bulk meals. While schools will not be participating in the Seamless Summer Option (SSO), the SSO uses the same meal pattern as the NSLP/SBP, so this guidance document may be useful.

If offering bulk meals, a menu should be provided so that the household understands which items and quantities are to be used to make up each meal. SFAs should ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc. In addition, consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating.

Water

USDA regulations require that potable water be provided to students at lunch time. This may be a complication for meals served in the classroom. Classrooms with water bottle fillers, sinks,

or sanitized drinking fountains that are available to students would already meet this requirement. For classrooms without these facilities, schools could consider providing water coolers in each classroom, or pitchers of water that teachers could pour for students. Alternatively, the SFA may provide bottled water daily with lunch.

Vermont has applied for a waiver of this USDA requirement, if the school has an alternative plan to ensure that students have access to water during lunch. These plans could include providing reusable water bottles to students with instructions to fill them at home, and a back-up option to provide water to students who forget their reusable water bottles. Based on Question 16 of [Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 - #5](#), the State agency expects to receive this waiver.

Please see page 4 of [Water Flushing Guide for School Building Owners and Facilities Managers Before Reopening for the 2020-21 School Year](#) when considering ways that students may access water during the school day.

USDA has indicated in Question 15 of [Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 - #5](#) that schools are not required to provide water to students learning remotely for meals that are to be eaten at home.

Serving Meals to Students at School

Please refer to [A Strong and Healthy Start: Safety And Health Guidance for Vermont Schools](#) for guidance on where students should be served and should eat under different conditions. This guidance also includes information on how to safely serve meals in a variety of scenarios.

Point of Service Meal Counting at School

Meals must be counted at the Point of Service. This means that when providing meals to students in the classroom, a teacher, a food service staff member, or another adult must watch each student take a reimbursable meal and mark down which students took the meals at the time that they took them. If meals are provided for students to pick up in the cafeteria or in a hallway and they then return to their classroom to eat, the Point of Service counting should happen where they pick up the meals. This may allow for food service staff to more easily conduct the Point of Service meal counts themselves, using existing POS equipment and systems. If the school is implementing one of the Universal Meals options (Provision 2 or CEP), only the number of students who took meals needs to be recorded.

If the meals are unitized, Point of Service meal counting in the classroom could be a fairly simple process that will require nominal training. If OVS is attempted in the classroom, then the adult taking the meal counts will need training on what constitutes a reimbursable meal. In any case, adults taking the meal counts will need annual civil rights training. This training is [available from the AOE](#) as a recorded webinar, or as a slide deck.

Counting the number of meals not eaten or counting the number of meals pre-ordered and sent to the classroom are not acceptable methods of Point of Service meal counting. Students may not conduct the Point of Service meal counting.

Offering Meals to Students Learning Remotely

SFAs may use one or more of the following methods to offer meals to students learning remotely:

- Make meals available for pick-up at the school, or at other locations
- Deliver meals to students either at bus stops or at their homes
- Send meals home with students for future days on the days they are attending in-person
- Enter into an agreement with another School Food Authority to offer meals to these students in one of the above ways

Multiple days' worth of meals may be offered at one time, as long as the SFA does so in a way that prevents duplicate meals from being provided to each student. SFAs should take into account the following factors when deciding how and when to offer meals to remote students:

- How long food may be safely stored before eating.
- How long food can be stored before food quality suffers.
- Participants' access to refrigerator and freezer space for the amounts of food and milk provided.
- Participant's ability and access to kitchen facilities necessary to re-heat food.
- Food storage space at the meal distribution site and on meal delivery vehicles (such as buses or food trucks).
- Whether fewer pick-up days and times will decrease access to meals for some students.
- How to offer meals in ways that reduce stigma around acceptance of meals, and prevent overt identification of free and reduced eligible students and their households.

When meals are provided to students to eat at home, they should be accompanied by appropriate labeling about how to safely store and re-heat the meals (if applicable).

Sending Meals Home with Students for Remote Learning Days

Schools using a hybrid model where students attend some days, but not others, may choose to send meals home with students. For example, Group A students will attend school on Monday & Thursday, and Group B students will attend Tuesday and Friday, with all students remote on Wednesday. In this example, Group A students could be sent home with 2 days of meals (Tuesday and Wednesday) on Monday afternoon, and 1 day worth of Meals (Friday) on Thursday afternoon. Group B students could be sent home with 2 days worth of meals (Wednesday and Thursday) on Friday afternoon and 1 day worth of meals (Monday) on Friday afternoon.

Whether or not this is feasible depends on the age of the students and their ability to safely carry home the quantity of food required, the length of time students will spend on buses, and the ability of the food service program to provide non-perishable meals or less-perishable meals that will still be good on the date that the students are to eat the meal. SFAs may need to combine this with a pick-up or delivery model to provide additional coverage to fully remote

students, or to students who were absent on the day meals were provided for their remote learning days.

If this model is used, meals should be counted when they are provided to the student to take home. Adults providing the meals to the students would need training appropriate to the type of meal service (unitized or offer vs. serve) and civil rights training. (See Point of Service Meal Counting at School [link]).

Meals available for pick-up at school or other locations

For many schools, offering meals for pickup at school may be the simplest method to make meals available to remote learners. However, schools should be aware that since this method places a greater burden on households, overall participation in the program will likely suffer, and some students who are in greatest need of the meals may miss out on them.

To mitigate these concerns, schools may consider offering additional pickup locations, such as a library, town offices, civic center, or other schools within the SFA. In addition, consider offering meals during a wide pick-up time window, or tailoring the pick-up time window to when working households may be available to come pick up the meals. With the nationwide meal time waiver, times do not need to be restricted – breakfast and lunch for the following day could be offered during the evening hours.

Pick-up when students are not present

The [nationwide parent/guardian meal pickup waiver \(extension 2\)](#) allows parents and guardians to pick up meals for enrolled students without the students being present. The waiver requires the state to establish procedures for ensuring that meals are only distributed to students eligible to receive meals from the SFA, and that duplicate meals are not served for the same student. In Vermont, this should be accomplished by collecting the student's name when the meals are distributed, and entering it into the SFA's Point of Service system. If the POS system cannot be set up to be used at the distribution point, a paper roster of eligible students may be kept and later entered into the POS system. The roster should not contain information about the student's free and reduced meal status. In addition to collecting the child's name, the SFA should include simple signage at the distribution point to indicate that these meals are intended for consumption by the child that they were picked up for, and that households should not collect duplicate meals for the same children from other child nutrition programs. This could also be accomplished through labeling of the meals or handouts provided with the meals.

USDA has allowed the State agency flexibility in determining what constitutes a parent or guardian. Vermont is allowing any adult with a note from the legal parent/guardian to pick up meals for students, in addition to legal parents/guardians.

Meals available for pick-up or delivered from other schools within the SFA

If households have students at multiple schools within the SFA, or live closer to certain schools within the SFA, the SFA may allow the households to pick up meals from schools other than

where the student is enrolled. The SFA must have a system in place to correctly record that the student ate, and what their status was, to allow the SFA to accurately claim the number of free, reduced, and paid meals served for each school day, and to prevent duplicate meals from being served. The SFA may claim the meals either at the school where the student was enrolled, or at the school that provided the meal. The SFA may wish to apply for a waiver of age/grade group meal pattern requirements if they plan to offer this option.

Meals provided from another SFA

SFAs may provide meals to students enrolled in schools outside the SFA only if they have an agreement with the student's SFA to share free and reduced eligibility information. The AOE plans to provide a template agreement for SFAs to use in these circumstances. Please be aware that offering meals to students from another SFA may mean incurring additional costs associated with meal accommodations or meal delivery. However, it may be an important service to households in this difficult time and could assist the SFA by increasing overall meal participation. If many students will be served meals this way, please speak with the State agency about possible errors in the CNPWeb system if the daily average number of meals served exceeds Average Daily Attendance.

Delivering meals to students in their homes or at bus stops

Many schools successfully offered meal delivery to households using school buses or other school vehicles during Spring 2020. Schools may continue to do this in SY20-21. Some SFAs have reported that their schools are able to provide meal bussing for little additional cost to the program using existing school bus contracts that will be underutilized in SY20-21. Please be aware that dynamics of meal delivery may be different now that households who do not qualify for free and reduced price meals need to be charged for any meals they opt to receive, and children who are not enrolled in school will not be able to receive these meals unless the household purchases additional meals for them (see non-program foods options).

Written Consent for Household Delivery

If meals will be delivered directly to a student's address (rather than to a shared bus stop), the SFA must obtain written consent (which could be done via email or other electronic means) that the household wishes to receive delivered meals. Schools must first obtain written consent from households of eligible students (this could include email or other electronic means) that the household wants to receive delivered meals. Written consent is required because the National School Lunch Act (NSLA) and the Family Educational Rights and Privacy Act (FERPA) do not authorize release of the student's address without first obtaining the written consent of the student's parent or guardian.

Question 4 of USDA's [Q&A on Meal Delivery using Existing Authorities in Summer Meals Program](#) contains additional instruction on how to handle sharing of information about household addresses with external organizations involved in meal delivery:

“The SFA must be the entity that makes the first contact about meal delivery with the households 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. If the school is using a private vendor, then under the regulations implementing the NSLA, they must have a memorandum of understanding (MOU) with the vendor concerning the confidentiality requirements. The MOU should include information such as what will be disclosed, how the information will be used, how the information will be protected from unauthorized uses and disclosures, and penalties for unauthorized disclosure. For further requirements, see 7 CFR 225.15(k)(1)-(2). The school must ensure data is handled appropriately at all times and by all organizations involved with meal delivery to safeguard household confidentiality.”

Fresh Fruit and Vegetable Program

The Fresh Fruit and Vegetable Program (FFVP) may continue to be offered to elementary school children at participating elementary schools both when they are in school and when they are learning remotely. USDA has issued [Guidance on Fresh Fruit and Vegetable Program Operations for SY 2020-21](#) that answers many questions on how these programs may be modified due to COVID-19. Vermont has received a waiver from USDA to allow parents and guardians to pick up FFVP items when children are not present. For SY20-21, the FFVP may be provided to children at the same time as other meals. At school, a separate time should still be set aside for children to consume the FFVP items, outside of the regular meal times. For remote learners, FFVP items should be packaged separately from other meal items, or somehow differentiated from the other meal items.

The State agency will be submitting a waiver to allow FFVP to be provided out of alternate locations other than elementary schools. However, this waiver has not yet been approved.

For additional guidance on operating the FFVP, please watch the [FFVP training session offered at Summer Institute 2020](#).

After School Meals Options

Schools who would like to continue offering meals at no charge during SY20-21 and are area-eligible should consider offering Afterschool Snack Service in the NSLP or the At-Risk Afterschool Meals Program in the CACFP as a means to provide a free snack, supper or both, to all students.

Schools that are located in area-eligible locations – areas with at least 50% of enrolled students qualifying for free and reduced-price meals in October 2019 (see the [2019-2020 Free and Reduced Eligibility Report](#)) - may offer snacks at no charge to all students through the After School Snack Service. Schools who are area-eligible based on October 2019 data or data from a later month may use the At-Risk After School Meals Program to provide supper and/or snack at

no charge to all children who are offered an enrichment activity. SFAs may not offer both programs for the same site. Speak with AOE Child Nutrition staff to determine which program is the best fit for your school.

Schools who are not area-eligible may also provide the After School Snack Service, however meals must be claimed based on the student's eligibility status. In this case, the school may charge the household for the meal, or may cover the cost of the paid students snacks with non-federal funds.

For both At-Risk After School Meals and the After School Snack Service, an enrichment activity must be offered. However, USDA has clarified in Question 18 of [Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 - #5](#) that this enrichment activity may be offered virtually. Programs operators could offer online homework assistance, activity packets, coloring pages, electronic games and books, or other e-learning activities for the children to partake in at home. For example:

- [Team Nutrition](#) offers a variety of online games, books, and nutrition education activities for children. Although children are not required to participate in or complete the activity in order to receive an afterschool meal or snack, the afterschool care program must offer the activity to all participating children.
- [Vermont PBS At-Home Learning](#) offers continuity of learning for Vermont students and school communities during COVID-19. Various programming is available to provide supplemental materials for households to utilize.
- [Vermont Public Radio \(VPR\)](#) offers coloring worksheets to accompany the 'But Why' podcast.

Students do not need to participate in the enrichment activity in order to receive the meals – it simply needs to be made available to those who choose to access it.

The State agency has submitted waivers to USDA to waive the enrichment activity requirements completely, however USDA has indicated that they are unlikely to approve these waivers given the flexibility to offer virtual enrichment activities.

Afterschool Snack Service in the NSLP

Schools that participate in the National School Lunch Program (NSLP) may participate in Afterschool Snack Service. Programs located in an area-eligible school (at or in the attendance area of a school where 50% or more of the enrolled students qualify for free and reduced-price meals), snacks may be served to all students at no cost and reimbursed at the free rate. Schools with fewer than 50% of enrolled students qualifying for free and reduced-price meals are reimbursed for snacks by free, reduced and paid status. Free status students receive snacks at no cost, reduced-price status may be charged no more than 15 cents for snack, and the paid-status price should cover the cost. Many non-area-eligible schools choose not to charge reduced and paid students for the cost of the snack, finding other sources of funds to cover these costs. The USDA nationwide waivers for non-congregate feeding, parent pickup and meal times apply to this program. As mentioned above, an enrichment activity is required to be offered to

participate in this program, however it may be offered virtually if on-site enrichment activities will not be occurring.

To initiate this program, SFAs will need to reach out to an AOE Child Nutrition Program team member and make adjustments to their site applications to add this program.

At-Risk Afterschool Meals Program in the CACFP

Schools that are located in an area-eligible location (with at least 50.00% of enrolled students qualifying for free and reduced-price meals) and offer afterschool enrichment or educational activity to all students are eligible to participate in the At-Risk Afterschool Meals Program in the CACFP. Sponsors can choose to offer supper and/or snack at no cost to children on days programming is provided.

Approved and participating At-Risk Afterschool Meals Program Sponsors with sites that are not re-opening for SY20-21 with an enrichment or educational activity on-site may continue offering meals by applying for the non-congregate meal service waiver with an accompanying plan to offer the enrichment or educational activity virtually. Site application changes in the Child Nutrition Programs Online Application and Claiming System for Program Year 2019-2020 will be required and must be submitted and approved prior to the start of the Program (September 8, 2020, is the earliest start date).

Approved and participating At-Risk Afterschool Program Sponsors who are re-opening with an enrichment or educational activity on-site for SY20-21 may only provide meals off-site if the Program has been approved to serve meals non-congregate style. If the Program would like to send meals home to children, the Sponsor must apply for the non-congregate meal service waiver. Site application changes to Program Year 2019-2020 will be required and must be approved prior to the start of the Program (September 8, 2020 is the earliest start date).

Sites under an approved At-Risk Afterschool Program Sponsor that are not currently participating and meet the area eligibility requirement may apply to participate in the Program during SY20-21 provided that the site offers the enrichment activity on-site or in a non-congregate style. All requirements related to onboarding a new site remain in effect and must be followed. This includes conducting a pre-approval visit, adding a new site application that must be submitted and approved prior to operation, and conducting a site visit within the first four weeks of operation. Please review the [CACFP Desk Audit Guidance for Sponsoring Organizations for Fiscal Year 2019-2020 and 2020-2021](#) for information on conducting these visits.

Please review the [Guidance on Non-Congregate Feeding for Child and Adult Day Care During Closure due to a Novel Coronavirus Outbreak](#) for information on how to apply for the Non-Congregate Feeding Waiver. Detailed instructions are provided on the application changes that must be made.

SFAs who have not previously sponsored the At-Risk After School Meals Programs may apply to begin participating this year, if they have locations that meet the area-eligibility requirements

and plan to offer either virtual or on-site enrichment activities. Please be aware that the application process is extensive. 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.

Civil Rights

As always, all adults involved in the implementation of the child nutrition programs need annual civil rights training. This training is [available from the AOE](#) as a recorded webinar, or as a slide deck. Per question 6 of [SP 24-2020, CACFP 13-2020, SFSP 13-2020 Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 – #5!](#), if meals are to be provided in the classroom as a result of COVID-19, the “And Justice for All” non-discrimination posters are not required in every classroom. They should be displayed in prominent locations throughout the school, such as a bulletin board in the main building entrance or the school office. To receive posters, please contact Ailynne Adams at (802) 828-1626 or Ailynne.adams@vermont.gov. Please do not submit requests for enough posters for each classroom.

When meals are provided for grab-and-go pickup, the “And Justice For All” non-discrimination poster should be posted at the pickup point. When meals are delivered from stationary vans or buses, the AJFA poster should be displayed on the vehicle. For vehicles making door-to-door drop deliveries to homes, the AJFA poster does not need to be displayed. If written information, such as food handling information, is included with the meals, the short form non-discrimination statement should be included as well.

Options for Non-Program Revenue

SFAs are reminded that they can sell adult meals or other foods to households as “non-program foods.” Households receiving meals for their students may be interested in purchasing additional meals so that the whole family can eat together. Non-program foods should never be sold for less than they cost to provide. If the meal is identical to the meal provided to the students, charging your standard “adult meal price” for these meals is usually sufficient.

SFAs may also sell foods for use in classroom celebrations, as long as the foods meet USDA’s [smart snack requirements](#). During COVID-19, these foods should be unitized and should be brought to the classroom by an adult; they should not result in additional student movement around the school building.

For more ideas on non-program revenue, watch [Making the Non-profit School Food Service Account Whole during COVID-19](#).

Monitoring Flexibilities During COVID-19

Site Monitoring

SFAs with multiple sites are required to conduct onsite monitoring annually by February 1, 2021. The USDA has issued and extended a [nationwide waiver of onsite monitoring requirements in the School Meals Programs](#). Monitoring activities must still take place, however they can be conducted through a desk review or virtual monitoring. The reviewer is not required to be on site to conduct the review.

School Nutrition Program Administrative Reviews

The State agency has received a waiver from USDA allowing for a one year pause in administrative review activities. SFAs who were scheduled to receive an administrative review in SY20-21 will instead receive that review in SY21-21. Instead, the State agency will conduct individual technical assistance calls with each SFA twice during SY20-21 – once in the first two months of the school year, and once midway through the school year.

CACFP Administrative Reviews and Procurement Reviews

Scheduled Administrative Reviews for CACFP At-Risk After School Meals Programs and Procurement Reviews will continue to take place in SY20-21. These will be conducted as desk reviews with no site visits from the State agency. The State agency will work with SFAs to be as flexible as possible in scheduling these reviews given the challenging circumstances. SFAs that were previously scheduled to receive a review in FY19-20 but was postponed due to COVID-19, will receive their review in FY20-21.