



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

**EDUCATION**

## **Policy Updates and Questions & Answers Related to COVID-19: LEA Meal Provision Guidance**

**(Updated June 30, 2020)**

**Please note:** This document combines two previously separate documents “Policy Updated Related to COVID-19: LEA Meal Provision Guidance” and “Questions and Answers Related to COVID-19: LEA Meal Provision Guidance.” This document is current as of the date above, and supersedes all previously released guidance.

**Applicable Meals Programs:** Seamless Summer Option (SSO), Summer Food Service Program (SFSP), Fresh Fruit and Vegetable Program (FFVP)

### **Background**

As a part of the District of Columbia’s response to coronavirus (COVID-19), the Office of the State Superintendent of Education (OSSE) is modifying, updating, and re-circulating certain policies.

### **Scope**

This document contains details and policies specifically relating to the **provision of meals to students** by LEAs, or School Food Authorities (SFAs).

### **Effective Date**

This policy will take effect from June 30, 2020 and will remain in effect until further notice. This policy supersedes the OSSE policy on this topic released on May 22, 2020.

### **Policy Guidance**

In the event of temporary or prolonged school closures, the United States Department of Agriculture (USDA) provides LEAs with options for providing meals to children. While LEAs are not required to feed children during closures caused by pandemics, building repairs, or natural disasters, OSSE strongly encourages LEAs to do so following USDA’s guidance and with the approval of OSSE and in coordination with public health authorities.

USDA provides two options, the Seamless Summer Option (SSO) and the Summer Food Service Program (SFSP), to provide meals at school settings and in a non-congregate format during unanticipated school closures.

Both the SSO and the SFSP:

- require OSSE approval;
- can be reimbursed for up to two meals each day;
- can provide up to seven days’ worth of meals at one time (14 meals);

- provide meals to children 18 and younger as well as persons age 18 and older with disabilities as defined by regulation; and
- provide meals free of cost to children.

(1) Seamless Summer Option

Currently approved LEAs operating the National School Lunch Program (NSLP) may serve meals under the SSO.

(2) Summer Food Service Program

Currently approved sponsors of the SFSP from 2019 may serve meals. New sponsors may complete a 2020 SFSP application.

OSSE recommends SSO for those LEAs that are not currently approved sponsors of the SFSP because the approval process is less time-consuming.

Prior to June 30, 2020, transitions to continuous learning due to coronavirus (COVID-19) were considered unanticipated school closures and allowed for meals to be served via the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO). As of July 1, 2020, continuous learning due to COVID-19 is no longer considered an unanticipated school closure and does not meet qualifications to serve meals during the school year under SFSP or SSO.

Meals can continue to be served under SFSP or SSO during the summer months of May through September until the 2020-21 school year begins. School Food Authorities (SFAs) are to utilize the School Breakfast Program (SBP), National School Lunch Program (NSLP), Afterschool Snack Program (ASSP) and Child and Adult Care Food Program (CACFP) to serve meals in the 2020-21 school year, whether students are physically in school or engaged in continuous learning.

Schools that have closed should coordinate with OSSE, DOH and DME related to further specific local public health guidance.

For more information, please visit [fns.usda.gov/disaster/pandemic](https://fns.usda.gov/disaster/pandemic). For more information on the DC Government's response to coronavirus (COVID-19), visit [coronavirus.dc.gov](https://coronavirus.dc.gov).

## Questions and Answers Related to COVID-19: LEA Meal Provision

### Purpose

To answer questions from, and support detailed policy guidance to, LEAs and SFAs about meal provision during unanticipated school closures due to coronavirus (COVID-19).

### General Guidance

#### **Q1: Where can I learn more about the DC state of emergency declaration?**

A: On Wednesday, March 11, 2020, Mayor Muriel Bowser declared both a state of emergency and a public health emergency. On Friday, March 20, 2020, Mayor Muriel Bowser issued Mayor's Order 2020-

050: Extensions of Public Emergency and Public Health Emergency: Coronavirus (COVID-19). For more information about this declaration, you can view the full Declaration of Public Emergency [here](#).

On Wednesday, May 13, 2020 Mayor Muriel Bowser extended the District's public emergency and public health emergency. The full order can be viewed [here](#).

**Q2: Where can I learn more about District essential services that will continue operating? For example, is Metro still offering Kids Ride Free services?**

A: The District government wants residents to know that it will continue to deliver essential services and keep the majority of its systems and services operating. View a list of available services and what is open on the DC coronavirus website at [coronavirus.dc.gov/page/whats-open](https://coronavirus.dc.gov/page/whats-open).

### General Meal Provision Guidance

**Q3. Are schools required to serve meals if schools are closed?**

A. No; however, the USDA and OSSE encourage SFAs participating in the NSLP and/or the School Breakfast Program and sponsors participating in the SFSP to help ensure that children do not experience a lapse in food security when there are unanticipated school closures.

**Q4. Can SFAs serve meals if schools are closed?**

A. Yes. Meals can be served during unanticipated school closures.

**Q5. Are SFAs allowed to serve meals at school sites?**

A. Yes. OSSE received a waiver from USDA allowing meals to be served at school sites that are closed due to the COVID-19 public health emergency.

**Q6. In a situation when schools are closed and SFAs are using either SFSP or SSO to provide meals, do the SFAs have to serve meals in a congregate setting?**

A. Although SFAs may serve meals in a congregate or non-congregate setting, OSSE strongly encourages meals be offered in non-congregate settings to allow for social distancing. Non-congregate means meals that may be taken away from the site and consumed elsewhere, allowing for social distancing. We also often refer to this as "grab and go." The waiver to allow for non-congregate feeding is in effect through Aug. 31, 2020.

**Q7. Where may school meals be served?**

A. Examples of where meals can be served include:

- School sites
- Churches
- Community Centers
- Afterschool centers

**Q8. What meals can be served?**

A. SFSP and SSO sponsors can serve up to two meals per day, including breakfast, lunch, supper and an AM or PM snack, except for lunch and supper.

SFAs that are already approved to participate in the Child and Adult Care Food Program (CACFP) to provide supper or snack may serve a third meal, to be claimed under CACFP. SFAs that are not currently enrolled in CACFP may not apply during unanticipated closures.

SFAs may provide up to seven days' worth of meals at a time and home delivery of meals.

**Q9. To whom can meals be served?**

A. Children age 18 and younger as well as persons age 18 and older with disabilities as defined by regulation.

**Q10. What health-related considerations should be taken into consideration?**

A. Schools and sponsors should review guidance provided by USDA, the CDC and DC Health on proper sanitation and cleaning protocols in response to coronavirus (COVID-19). In general, to limit additional exposure in the event of a large-scale closure, meal service sites should create a plan to provide meals quickly to children through a grab-and-go service method and discourage children from congregating at these locations.

**Q11: Where can I get information about central food distribution locations other than at LEAs?**

A: Information about food distribution locations can be found at <https://coronavirus.dc.gov/food>. This resource will be updated regularly, so please check back frequently.

Information can be found for each program as follows:

- [Pandemic EBT \(P-EBT\)](#)
- [Meal Delivery for Seniors](#)
- [Supplemental Nutrition Assistance Program \(SNAP\) and Temporary Assistance for Needy Families \(TANF\)](#)
- [Women, Infants, and Children](#)

**Q12: Where can I find current information about LEAs providing meals, including supper, and the location of those sites?**

A: Information about LEA meal location sites is posted on <https://coronavirus.dc.gov/food>. The information will be updated regularly and include new meal sites, so please check back frequently.

**Program Options – Seamless Summer Option (SSO) and Summer Food Service Program (SFSP)**

**Q13: How can an SFA serve meals during unanticipated school closures?**

A: SFAs have two options to serve meals during unanticipated school closures.

1. SFAs may serve and be reimbursed for meals through the Seamless Summer Option of the National School Lunch Program (NSLP). See the [SSO Quick Reference Guide](#) to amend an application.
2. The six SFAs approved to serve meals in 2019 through the Summer Food Service Program may serve and be reimbursed for meals by amending their current application. See the [SFSP Quick Reference Guide](#) to amend an application. SFAs without a 2019 approved SFSP application may complete a 2020 SFSP application.

**Q14: Can 2019 SFSP sponsors serve at additional sites that were not included in the original application?**

A: Possibly. Please reach out to [OSSE's SFSP Program Coordinator](#) for further guidance.

**Q15. Can we offer meals under the standard National School Lunch Program (NSLP) during periods of school closure?**

A: No. Meals cannot be served under the standard NSLP during periods of school closure.

**Q16: Can SFAs and sponsors operate SFSP or SSO programs if the school facilities are closed but remote instruction is provided?**

A: Yes. If the building is closed and students cannot attend their physical school location for classes, SFAs and sponsors may operate SFSP or SSO programs as permitted under program requirements even when remote instruction is provided.

**Q17: Do SFAs and sponsors have to operate open sites or can they operate a closed site?**

A: Closed sites have specific requirements and may be considered upon request. Please reach out to an [OSSE nutrition program specialist](#) to discuss this option further.

**Q18. How should sponsors determine closed enrolled sites' eligibility?**

A. Sponsors may use area eligibility to determine if closed enrolled sites are eligible to participate in SFSP or SSO. The USDA waiver eliminates the requirement that closed enrolled sites collect income eligibility forms and is in effect through Sept. 30, 2020.

**Q19: My SFA plans to operate at only some of our sites. Is it allowable for students who attend schools without an open site to be redirected to the open sites?**

A: Yes. We encourage SFAs to direct children to sites serving meals.

**Q20. Are SFSP sponsors required to complete first week site visits for returning sites?**

A. If returning sites are in good standing, sponsors are not required to complete first week site visits. This also applies for sponsors in good standing that had successfully participated in the Child and Adult Care Feeding Program (CACFP) or National School Lunch Program (NSLP). Sponsors must complete first week site visits for returning sites that are not in good standing. The waiver that USDA released eliminating this requirement for returning sites in good standing is in effect through Sept. 30, 2020.

**Q21. Are SSO sponsors required to complete self-monitoring?**

A: Yes. SFAs operating the SSO are required to complete one self-monitoring review for each site operating the SSO. USDA has waived the on-site portion of the self-monitoring review through **Aug. 31, 2020**. To the maximum extent practicable, SFAs operating the SSO should complete self-monitoring offsite through a desk audit. SFAs can use the SSO site review form found [here](#), or develop their own monitoring form.

**Meals:**

**Q22: Can meals be served on the weekends and receive USDA reimbursement?**

A: Yes. For schools closed due to an unanticipated school closure due to COVID-19, with OSSE approval, SFSP and SSO sponsors may serve meals on days when schools had originally planned to be closed, including weekends, spring break, and other previously scheduled days off.

**Q23: Are meals served through SFSP and SSO required to follow the NSLP meal pattern?**

A: OSSE strongly encourages SFAs and sponsors to maintain and meet the nutrition standards for each program to the greatest extent possible. If there are specific and justified reasons the meal pattern cannot be met based on disruptions to the availability of food products resulting from unprecedented impacts of COVID-19, OSSE may waive the requirement that meals meet meal pattern requirements.

For OSSE to waive meal pattern requirements, SFAs and sponsors must amend and re-submit their SFSP or SSO applications. Amended applications must include the specific food component that cannot be met, including justification. OSSE may approve requests on a case by case basis. Approvals to waive meal pattern requirements remain in effect through **July 31, 2020**.

**Q24: Will meal pattern waivers affect a program operator's responsibility to make meal modifications for participants with disabilities?**

A: During this public health emergency, program operators are not relieved of their obligation to provide meal modifications for participants with disabilities. When planning a non-congregate meal service, program operators should consider how individuals who require meal modifications will be identified and served.

**Q25: What can SFAs and sponsors operating open and restricted open sites do if they have difficulty implementing the age/grade/group requirements?**

A: Consult with their [OSSE nutrition program specialist](#) regarding possible accommodations.

Accommodations:

- May include using a single age/grade group meeting the minimum meal pattern requirements for the most common age/grade group attending the site.
- Must possess a reasonable justification for the need to deviate from the age/grade group requirement.
- May only apply to open and restricted open sites where meals are served to all children in the community on a first-come/first-served basis.

**Q26: What can I do to provide meals that meet the meal pattern and are shelf-stable?**

A: Detailed information on shelf-stable foods, those that can be stored at room temperature for an extended period of time, can be found [here](#). Shelf-stable milk may be used as needed. Other shelf-stable items include, but are not limited to, applesauce, sun butter, crackers, granola, dried meats and fruits, and juice. More information for crediting shelf-stable meat, poultry and seafood products can be found in the USDA policy memo [SP 21-2019 Crediting Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Products in the Child Nutrition Programs](#).

**Q27: Can SFAs and sponsors serve more than one meal-type and/or more than a day's worth of meals at a time?**

A: SFAs and sponsors can serve and be reimbursed for serving up to two meals each day. Meals can be any combination of breakfast, lunch, AM or PM snack, or supper, EXCEPT for lunch and supper.

Additionally, SFAs and sponsors may provide up to seven days' worth of meals at one time. For example, if a site is serving breakfast and lunch, a student may pick up seven days' worth of breakfasts and seven days' worth of lunches, totaling 14 meals, at one time. SFAs and sponsors wishing to revise their distribution method must update their SFSP or SSO application to reflect their new distribution. Food

safety is of utmost importance, specifically if multiple days' worth of meals are provided. Please reference the food safety section below.

The waiver to allow for meal service time flexibility remains in effect through Sept. 30, 2020. The waiver to allow for non-congregate feeding remains in effect through Aug. 31, 2020.

**Q28: Do children need to be present to receive a meal from these programs? What about children who are symptomatic or under quarantine?**

A: Meals served through the SFSP, SSO or the Child and Adult Care Food Program (CACFP) may be distributed to a parent or guardian to take home to their child(ren) without the child(ren) being present if certain processes are followed. This waiver is in effect through Aug. 31, 2020. SFAs and sponsors must have a plan in place to ensure accurate accountability and program integrity. Plans must include the following:

- A process to ensure that meals are distributed only to parents or guardians of **children 18 and younger as well as persons age 18 and older with disabilities as defined by regulation** (*applicable to SFAs and sponsors operating SFSP, SSO, or At-Risk CACFP*);
- A process to ensure that meals are distributed only to parents or guardians of **enrolled children** (*applicable to CACFP full-day child care centers, Family Day Care Homes*); and
- A process to ensure that duplicate meals are not distributed to any child.

SFSP, SSO and CACFP sponsors must submit their plan to OSSE with their program application updates.

**Q29: Many meal sites are from 10 a.m.–2 p.m., which overlaps with the timing of distance learning offered by many LEAs. Is there an opportunity to consider other times of day to have schools prioritize serving?**

A: SFAs and sponsors can establish meal times and service lengths that best support non-congregate meal service in a manner that maintains health and safety standards. USDA's waiver released on March 20, 2020, allows meals to be served outside of required breakfast, lunch, supper, and snack serving times. This waiver is in effect through Sept. 30, 2020. SFAs and sponsors must update their application in Orchard to reflect new pick-up schedules or delivery plans with designated times for distribution.

We are aware that many schools are serving meals during this 10 a.m.-2 p.m. period, and we encourage SFAs and sponsors to serve multiple meals (and multiple days of meals) at once to make the pick-up and potential conflict with remote instructional time less onerous.

**Q30: Will meals served under SFSP and SSO during unanticipated closures related to coronavirus (COVID-19) be eligible for HSA reimbursement?**

A: Yes. Breakfast and lunch meals served under SFSP and SSO are eligible for HSA reimbursement. The HSA reimbursement rate is \$0.20 for each breakfast served and \$0.10 for each lunch served. Due to the unique challenges and administrative burden posed, the \$0.05 reimbursement for locally grown and unprocessed foods will not be available during the unanticipated closures related to the coronavirus (COVID-19) response.

**Q31: May SFAs and sponsors provide food items in bulk, either through pick up or home delivery, without additional waivers?**

A: When providing multiple meals at one time, SFSP, SSO and CACFP program operators may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal.

The waiver to allow for meal service time flexibility remains in effect through Sept. 30, 2020. The waiver to allow for non-congregate feeding remains in effect through Aug. 31, 2020.

When implementing such a delivery mechanism, program operators **must**:

- include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- ensure that food items are clearly identifiable as making up reimbursable meals; and,
- provide menus with directions indicating which items are to be used for each meal and the portion sizes.

When implementing such a delivery mechanism, program operators **should** consider the following:

- whether households have access to needed appliances (e.g., refrigerator, stove, microwave) when providing food that requires refrigeration or further preparation, such as reheating; and
- only minimal preparation is required (e.g., recipes that do not require chopping, mixing, baking).

Before providing bulk items:

- SSO sponsors must update their program application to reflect this change in delivery
- CACFP and SFSP sponsors choosing to implement this option must update the non-congregate meal waiver tab of the COVID-19 Waiver Registration spreadsheet. To receive the waiver registration spreadsheet, contact your assigned CACFP or SFSP specialist.

## Home Delivery

The waiver to allow for meal service time flexibility remains in effect through Sept. 30, 2020. The waiver to allow for non-congregate feeding remains in effect through Aug. 31, 2020.

### **Q32: Can schools that have been approved for non-congregate feeding through SFSP or SSO deliver meals directly to students' homes?**

A: Yes. If the SFA determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with OSSE approval. SFAs desiring to deliver meals to students' homes must update their SFSP or SSO application to reflect this new distribution method and contact their [OSSE nutrition program specialist](#) for approval. See [USDA's Q&A](#) released on March 17, 2020 and additional questions below for requirements surrounding the delivery of meals.

### **Q33: Can SFSP sponsors other than SFAs deliver meals to students' homes?**

A: No. This option is only available to SFA sponsors of school sites due to student confidentiality and logistical requirements.

### **Q34: What must an SFA do before starting meal delivery at a student's home?**

A: SFAs must first obtain written consent from households of eligible children (consent can be obtained through email or other electronic means) that the household wants to receive delivered meals. SFAs 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.

SFAs must protect the confidentiality of students and their households throughout this process. The National School Lunch Act (NSLA) and the Family Educational Rights and Privacy Act (FERPA) do not authorize the release of household contact information for children without first obtaining the written consent of the child's parent or guardian. 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 nonprofit that will provide meal delivery. Once the SFA receives written consent from the parent or guardian to release contact information, the SFA may share the information with other organizations involved with meal delivery. The written consent must (1) specify the records that may be disclosed; (2) state the purpose of the disclosure; and (3) identify the party or class of parties to whom the disclosure may be made.

If the SFA is using a private vendor, they must have a memorandum of understanding (MOU) with the vendor concerning the confidentiality requirements under the regulations implementing the NSLA. 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. The SFA must ensure data is handled appropriately at all times and by all organizations involved with meal delivery to safeguard household confidentiality.

**Q35: How many home-delivered meals per child may be delivered at once?**

A: The maximum number of meals that may be provided to each child per day remains the same as under SFSP or SSO, i.e., up to two meals, or one meal and one snack, in any combination except lunch and supper. OSSE has approved service of up to seven days' worth of meals at one time.

**Q36: Do home-delivered meals need to be shelf-stable?**

A: No. The type of meal offered will depend on the resources and capacity of the site. Those who can prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets food safety requirements may do so. Home-delivered meals have to meet all meal pattern requirements of the SFSP or SSO.

**Q37: Does the child need to be present for home meal delivery?**

A: No. As long as the school has obtained the household's written consent to deliver meals and has verified the current address, the student does not need to be present at the time of delivery. If the meals are shelf-stable, no one needs to be present, as long as the address has been verified. Please consider food safety requirements and best practices.

**Q38: Who can schools deliver meals to under an open SFSP and SSO site?**

A: Schools operating an open SFSP or SSO site may deliver meals to all children in their eligible area.

**Q39: If a household has children in multiple schools, can the schools coordinate to provide one home delivery for all children in the household?**

A: Yes. To the extent feasible, SFAs or schools are encouraged to coordinate their deliveries to make the best use of their resources.

**Q40: Are there additional food safety measures that should be followed?**

A: Yes. All food regardless of delivery or service method should follow proper handling, storing, and heating procedures. Cold food should be delivered below 40 degrees and hot food above 140 degrees. If

the item is shelf-stable, it can be delivered at room temperature. See below for additional information regarding food safety.

## Food Safety

### **Q41: What food safety guidance should be followed?**

A: While USDA is not aware of any reports at this time of human illnesses that suggest COVID-19 can be transmitted by food or food packaging, it is always important to follow [proper hygiene practices](#) (i.e., wash hands and surfaces often, separate raw meat from other foods, cook to the right temperature, and refrigerate foods promptly) and [food safety practices](#) when handling or preparing foods.

Grab and go meals that are not consumed on-site should be placed in a refrigerator within two hours and stored under 41 degrees Fahrenheit. Foods should be reheated to 165 degrees Fahrenheit before consumption. Additional reheating instructions can be found [here](#). Foods that are known as “shelf-stable” can be stored at room temperature for an extended period of time (e.g., cereal, graham crackers, raisins).

### **Q42: Is there additional guidance for sites that are giving out seven days’ worth of meals at a time or providing home delivery?**

A: SFAs and sponsors should use the Centers for Disease Control and Prevention (CDC) guidance for storing leftovers when planning their menu. Menus should ensure that the food will last for seven days or be replaced with a [shelf-stable item](#). More information for crediting shelf-stable meat, poultry and seafood products can be found in this [USDA policy memo](#). SFAs should provide students with the menu for the week and guidance on cold food handling, and holding and reheating, to ensure all students are following proper food safety procedures. SFAs must inform students on how long each menu item can remain in the refrigerator and continue to be safe for consumption. Meals that are not consumed before the last day they can be safely stored in the refrigerator should be discarded.

### **Q43: Can USDA Foods be included in meals served during unanticipated school closings?**

A: Yes. USDA Foods, including DoD Fresh, can be included in reimbursable meals served through SSO and SFSP during unanticipated school closings.

## Fresh Fruit and Vegetable Program (FFVP)

The waivers related to the FFVP remain in effect through June 30, 2020.

### **Q44: Can SFAs operate the FFVP during COVID-19 school closures?**

A: Yes. Elementary schools operating FFVP may serve fruits and vegetables to students at the time the operators determine to be appropriate. See [USDA’s Q&A](#) released on April 10, 2020 and additional questions below for requirements surrounding operating of FFVP.

### **Q45: Can FFVP be provided at the same time as SSO or SFSP meals?**

A: Yes. Elementary schools operating SSO and SFSP during unanticipated school closure can provide FFVP foods along with SSO and SFSP meals at the same time. Additionally, SFAs may choose to operate FFVP independently and are not required to operate both programs concurrently.

### **Q46: Can SFAs serve FFVP in a non-congregate setting or through home delivery?**

A: Yes. Elementary schools may operate FFVP in a non-congregate setting and/or through home delivery without requesting a waiver. However, please note that OSSE does require SFAs to obtain a waiver to implement SSO or SFSP home delivery.

**Q47: Can multiple days' worth of FFVP fruits and vegetables be served through pick up or home delivery?**

A: Yes. Elementary schools providing multiple days of SSO or SFSP meals at one time may also provide multiple servings of FFVP foods at one time. For example, sites may permit children to pick up a week's supply of FFVP fruits and vegetables at one time. Additionally, sites may permit a week's supply of FFVP to be delivered to children's place of residence.

**Q48: SFAs operating SSO and SFSP can request a waiver to allow parents or guardians to pick up meals for students. Is there a waiver to allow parent or guardian pick up of FFVP foods?**

A: Yes. The statewide waiver allowing parents to pick up FFVP foods for children at non-congregate sites will allow a parent and guardian to take home FFVP foods in addition to meals from all other programs. The statewide waiver is in effect through June 30, 2020. Additionally, SFAs and sponsors must have a plan in place to ensure accurate accountability and program integrity. Plans must include the following:

- A process to ensure that meals are distributed only to parents or guardians of **children 18 and younger as well as persons age 18 and older with disabilities as defined by regulation (applicable to SFAs and sponsors operating SFSP and SSO)**;
- A process to ensure that duplicate meals are not distributed to any child.

SFSP and SSO sponsors must submit their plan to OSSE with their program application updates.

**[New] Q49: Can SFAs operating SSO and SFSP allow FFVP foods to be served at any of the SFAs' school sites distributing one of the Child Nutrition Programs during closures related to COVID-19?**

A: Yes. A statewide waiver allowing SFAs with elementary schools that currently participate in FFVP but are not operating during COVID-19 school closures will allow SFAs to serve FFVP foods at alternative middle and high school sites operating SSO and SFSP. The statewide waiver is in effect through June 30, 2020. Additionally, SFAs must send FFVP alternate FFVP site requests to OSSE and include:

- The originally approved site;
- The alternate site seeking approval

**Q50: Can elementary schools that currently participate in FFVP provide fruits and vegetables to any child attending an open site at the school?**

A: Yes. If an elementary school is operating an open site, FFVP foods may be provided to any children attending the site.

**Q51: What is the serving size requirement for FFVP?**

A: The FFVP serving for a week must reflect what would be served to an individual during a school week.

**Q52: Are FFVP operators required to provide nutrition education since schools are closed?**

A: No. OSSE encourages FFVP operators to provide nutrition education lessons but they are not required as OSSE recognizes education lessons are not practical during the current public health emergency.

**Q53: Can an FFVP operator donate its produce to another school or food bank?**

A: FFVP foods may be served only at elementary schools currently approved to operate FFVP. However, if existing fresh produce cannot be used and would need to be disposed of, then the produce can be donated to another school or food bank.

**Q54: What happens if, due to the COVID-19 school closures, 2019-20 school year FFVP funds are not spent?**

A: If 2019-20 school year FFVP funds are not spent by the end of the fiscal year, the funds will be recovered by USDA for use in the next fiscal year.

**Q55: Can current elementary schools operating FFVP use the rest of their FFVP funds for ordering produce to use during COVID-19 school closures?**

A: Yes. SFAs may use their remaining FFVP funds to continue purchasing fruits and vegetables, and for administrative expenses of the program as allowed. Claims for reimbursement can be made through Sept. 30, 2020, as with regular program operations.

**Q56: Will additional funds be made available for current FFVP elementary schools?**

A: No. 2019-20 school year funds have already been distributed and no additional funds for this school year are available.

## Contracts and Applications

**Q57: Can contracts for food service management be extended for the National School Lunch Program and Summer Food Service Program?**

A: Yes. Food service management contracts that may expire by or around June 30, 2020 may be extended through June 30, 2021. To ensure program integrity during this time, extended food service management contracts will be limited to one year only.

**Q58: I applied for lunch only when I applied for SSO. Can I go back and amend to add breakfast?**

A: Yes. SFAs can amend their SSO or SFSP application to include an additional meal-type and make other updates as necessary.

**Q59. How long may SSO and SFSP sponsors operate under current unanticipated closure requirements?**

A: SSO sponsors may operate under current unanticipated school closure requirements through July 30, 2020. Consistent with prior years, NSLP applications, including SSO, are due Aug. 31, 2020.

SFSP sponsors may operate under current unanticipated school closure requirements until June 30, 2020. For summer 2020, the DC SFSP application deadline is May 30, 2020 for returning SFSP sponsors and July 1, 2020 for new SFSP sponsors.

## Tracking and Claiming Meals

**Q60: How should SFAs and sponsors track meals served to students under the SSO or SFSP? What are the reporting requirements?**

A: SFAs and sponsors must track meals on a daily basis either manually or via an electronic point of service (POS) system. These meals must be identified as being served during an unanticipated school closure under each program. Meal tracking must be inclusive of the site name, date of service, meal-

type(s), and number of meals served. Meal types should be tracked separately. OSSE encourages the use of the template [meal count form](#).

**Q61: Will SFAs have to submit a separate claim for SSO?**

A: Yes. An SSO claim will need to be submitted separately from the NSLP claim. Additional guidance will be provided specific to SSO claims for reimbursement. Standard 2020 SFSP applications should be submitted.

**Q62: How do I determine which rate to claim meals under when using SSO?**

A: All students may be claimed as "free" under SSO.

**Q63: How do I complete edit checks within the claim?**

A: Edit checks are NOT a required component of the SSO or SFSP claim for reimbursement. SFAs and sponsors must ensure that meals claimed for reimbursement reflect the number of meals served. Daily point of service documents must support the claim for reimbursement.

### Allowable Costs

**[New] Q64: Is the purchase of personal protective equipment or other supplies intended to prevent or reduce the spread of COVID-19 an allowable cost?**

A: Yes. Personal protective equipment, for example gloves and face masks, as well as cleaning and sanitary supplies are allowable costs during the public health emergency provided that such purchases are made in support of child nutrition program operations.

**[New] Q65: May funds from the nonprofit food service account be used to cover meal delivery costs and/or the purchase of supplies to facilitate non-congregate meal service during the public health emergency?**

A: Yes. Expenses related to meal delivery and/or provision of meals in non-congregate settings are allowable costs. Additional reimbursement is not available for this purpose.

**[New] Q66: May funds from the non-profit food service account be used to purchase bottled water (as an alternative to water fountains and other on-site options) for non-congregate meals served during the public health emergency?**

A: Yes. The purchase of bottled water to supplement meals, served in non-congregate settings is an allowable cost. Milk is expected to be served as a part of each reimbursable meal and potable water may not be provided as a substitute for milk.

### Civil Rights

**Q67: Do you need to have "And Justice for All" (AJFA) posters on mobile routes for COVID-19 meal distribution?**

A: For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed. 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 2019 AJFA posters are not available for display, [paper copies](#) may be substituted as necessary, including the use of the 2015 AJFA poster as needed. Meals delivered from stationary vans or buses should display the AJFA poster.

## Waiver Dates

USDA has issued a number of guidance documents recently that extend the waivers for a number of Child Nutrition Programs. The table below identifies the date that select subjects of Child Nutrition Programs are in effect until.

Table 1. Dates Waivers Are In Effect Until for USDA Child Nutrition Program for Select Subjects

USDA Programs	Waiver Subject	Waiver in Effect Until
Child and Adult Care Food Program (CACFP)	Non-congregate feeding	Aug. 31, 2020
	Parent Pick-up	Aug. 31, 2020
	Meal Pattern	July 31, 2020
	Meal Times	Aug. 31, 2020
	Monitoring	Aug. 31, 2020
Seamless Summer Option (SSO)	Non-congregate feeding	Aug. 31, 2020
	Parent Pick-up	Aug. 31, 2020
	Meal Pattern	July 31, 2020
	Meal Times	Sept. 30, 2020
Fresh Fruit and Vegetable Program (FFVP)	FFVP	June 30, 2020
	Parent Pick-up	June 30, 2020
Summer Food Service Program (SFSP)	Non-congregate feeding	Aug. 31, 2020
	Parent Pick-up	Aug. 31, 2020
	Meal Pattern	July 31, 2020
	Meal Times	Sept. 30, 2020
	Monitoring	Aug. 31, 2020
	Closed Enrolled	Sept. 30, 2020
	First Week Site Visit	Sept. 30, 2020

For resources and additional information on the District of Columbia Government's coronavirus (COVID-19) response and recovery, please visit [coronavirus.dc.gov](https://coronavirus.dc.gov).