

School Year 2021 COVID-19 Auditing Guidance for NSLP/SBP/FFVP/After School Snack

NATIONAL SCHOOL LUNCH & SCHOOL BREAKFAST PROGRAM:

GENERAL INFORMATION

- Only enrolled students may participate
- Standard meal counting and claiming
- Standard Free and Reduced Priced Meal Application and Verification process or CEP/Provision 2
- HACCP Standard Operating Procedures for Food Safety and Record Keeping are required.
- Standard Reimbursement Rates for Free, Reduced and Paid
*Breakfast (non-severe need) \$1.89, (severe need) \$2.26; *Lunch (\$.07 certified) \$3.53 *After School Snack \$.96

GUIDANCE RELATED TO COVID-19 NATIONWIDE WAIVERS & MEMOS

- **Meal Service Time Flexibility - Waiver Response #1, #23, #34 – expires June 30, 2021**
 - Provides flexibility for serving times, serving multiple meals for multiple days. Service times are required.
- **Non-congregate Feeding - Waiver Response #2, #22, #33 – expires June 30, 2021**
 - Allows meals to be served off-site, grab n go, curbside, mobile/bus routes, and home delivery.
- **Meal Pattern Flexibility - Waiver Response #4, #13, #24, #26, #36 – State Agency Approval – expires June 30, 2021**
 - Operators must get advance approval from their State Agency.
 - **Meal Pattern Waiver requests were emailed from jragan@alsde.edu on Tue 9/15/20 at 11:45 a.m.**
 - State Agency can only grant this waiver on case-by-case basis and must inform their regional office when, where, and for which components the waiver is in effect.
 - USDA instructs states to consider if the request is due to supply issues.
- **Parent/Guardian Pickup - Waiver Response #5, #25, #35 — expires June 30, 2021**
 - Parents/Guardians may pick up meals without child.
- **Onsite Monitoring - Waiver Response #9, #29, #41 - Expires June 30, 2021**
 - Waives the onsite monitoring requirement for state agencies and SFAs.
 - Allows states to postpone required reviews of SFAs that are closed and request an extension on their review cycle as needed.
 - Waives the requirement to complete the onsite portion of an administrative review within the same school year that the review was begun.
 - ALSDE will conduct reviews as required to the maximum extent possible.
- **60-Day Reporting Requirement – Waiver Response #12 – No expiration date**
 - This now allows 90 days rather than 60 days for submission of reports.
 - States and operators are encouraged to meet the original deadline wherever possible.
- **SP 11-2020 – Q&A related to CNP Monitoring and Reporting Nationwide Waivers**
 - State Agency will submit a report to USDA no later than one year after the State received the waiver.
 - Local Program operators participating under the waivers are required to maintain records to document compliance with Program requirements should maintain documentation of their participation for future reviews. Surveys were emailed from jragan@alsde.edu on 7/4/2020 at 2:39 p.m.
- **SP 13-2020 – Q&A related to CNP Response #1-#3 Mealtime, Non-congregate Feeding and Meal Pattern Flexibility**
 - Extends waivers to September 30, 2020.
 - Impact Reports must be submitted within a year of the waiver.
 - Allows one breakfast per child per day, one lunch per child per day and one snack per child per day.
 - All locations of meal service must be approved on the online agreement.
- **SP-14-2020 Guidance related to Meal Delivery: With State Agency approval**
 - Allows direct to home delivery via mail or delivery service, and hand delivery by school staff, volunteers, community organizations or others. (Only available to SFA sponsors of school sites with State approval.)
 - Sponsor must obtain written consent from households.
 - Postage or delivery fees are allowable expenses.
 - Confirms SFAs may operate two programs if different meals are served.
 - Allows service of two meals per day, per child up to one week at a time.
 - Public notification of all sites is required.
 - Requires accommodations for limited English proficiency, language assistance or other special needs.

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- **SP 15-2020 Q&A related to Meal Service**
 - The nondiscrimination statement must still appear on informational materials.
 - Racial and ethnic data can be collected through school enrollment/ALSDE information/DHR-SNAP
 - Operators must still make meal accommodations for participants with disabilities.
- **Wellness Triennial Assessment – Waiver Response #18** – If requested by June 30, 2020, assessment must be complete by June 30, 2021. Second Assessment will be due June 30, 2024.
- **Food Service Management Contracts – Waiver Response #19** – Expires September 30, 2020
 - Allows FSMC contracts that may expire on or around June 30, 2020 to be extended through SY 2020-2021 (to June 30, 2021) using emergency non-competitive procurement.
 - Contracts negotiated or extended through emergency procurement may not be renewed.
- **SP 21-2020: Q&A Related to Food Service Mgt Contracts**
 - Provides guidance for allowable expenses and contract extensions.
- **OVS Flexibility for Senior High Schools – Waiver Response #37**
 - This is intended to make it easier for schools to serve pre-plated meals in the classroom if needed or to offer multi-day meal kits to students engaged in distance learning.
- **SP 23-2020: Q&A related to FFVP**
 - Non-congregate setting allowed without educational component.
- **SP 24-2020: Q&A Related to School reopening guidance on August 21, 2020**
 - **Q&A #7 As a result of a Maryland legal case school meal patterns returned to the requirements under the 2012 final rule.**
 - Due to the coronavirus pandemic USDA has allowed flexibility based on SY21 procurement being underway when the court decision was rendered. If sponsors need this flexibility, they should submit a waiver for Sodium, Milk and Whole Grains for State agency approval.
 - Refer to email regarding waivers and memo from jragan@alsde.edu on 9/15/2020 at 11:45 a.m.
- **SP 25-2020: Q&A Related to SSO/SFSP operations through December 2020**
 - Allows meals served through NSLP/SBP this school year before August 31 to be reimbursed through SSO/SFSP.
 - Allows SFAs to operate NSLP/SBP at some schools and SSO at other schools.

NSLP FRESH FRUIT AND VEGETABLE PROGRAM

- **ALSDE FFVP Parent Pickup Waiver (Granted August 28, 2020):**
 - Allows parent pickup of FFVP foods
- **SP 12-2020, SP 19-2020 (EXPIRED 6-30-20) SP 23-2020 Q&A Related to FFVP**
 - FFVP may not be used in other programs
 - May operate outside the school day.
 - May operate in non-congregate setting.
 - Allows FFVP to be served to any child at an open elementary school site.
 - Allows multiple days to be served at one time.
 - Educational component is waived.
- **Alabama FFVP at Alt Sites Waiver Approval (Granted September 28, 2020):**
 - Allows FFVP operations at sites that are not elementary schools during COVID-19.
 - Must request approval from ALSDE.
 - May operate alongside SFSP or SSO.

NSLP AFTERSCHOOL SNACK

- Reimbursement - \$.96
- **Afterschool Snack - Activity Requirement – Waiver Response #3 – expired June 20, 2020**
- **Q&A #5** The enrichment activity requirement is active again; however, these activities may be conducted virtually or in other non-congregate ways.
- **ALSDE/USDA Q&A** - Afterschool Snack Program can take place in conjunction with SFSP.