

School Year 2021 COVID-19 Auditing Guidance for Seamless Summer Option

GENERAL GUIDANCE

- NSLP budget process with accounting codes: fund source 5101 and expense function code 4210
- Meal Tally Sheets or POS system are acceptable.
- Standard Production Records, Menus/Contribution Reports and Daily Meal Counts, same as NSLP.
- HACCP Standard Operating Procedures for Food Safety and Record Keeping are required.
- Maintain inventory with NSLP inventory.
- **NSLP Free Reimbursement Rates SY2021**
 - *Breakfast (non-severe need) \$1.89, (severe need) \$2.26; *Lunch (\$.07 certified) \$3.53 *Afterschool Snack \$.96

GUIDANCE RELATED TO COVID-19 NATIONWIDE WAIVERS AND MEMOS

- **Meal Service Time Flexibility - Waiver Response #1, #23, #34, #50 – expires December 31, 2020**
 - Provides flexibility for serving times, serving multiple meals for multiple days. Service times are required.
- **Non-congregate Feeding - Waiver Response #2, #22, #33, #54, #61 - expires June 30, 2021.**
 - Allows meals to be served off-site, grab n go, curbside, mobile/bus routes or home delivery.
 - **Q&A #1, Meal Delivery:** With State Agency approval,
 - Direct to homes via mail or delivery service, hand delivered by school staff, volunteers, community organizations or others. Only available to SFA sponsors of school sites.
 - Postage or delivery fees are allowable expenses.
 - Must obtain written consent from households.
 - Allows two meals per day, per child up to one week at a time.
- **Meal Pattern Flexibility - Waiver Response #4, #13, #24, #26, #36, #53, #63, #70 – w/State Approval – exp June 30, 2021**
 - Operators must get advance approval from their State Agency.
 - **Meal Pattern Waiver Requests email was sent out from iragan@alsde.edu on Tue 9/15/20 at 11:45.**
 - 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.
 - **SP 14-2020: Response #70**
 - Sponsors may serve one type of milk without requesting a waiver.
- **Parent/Guardian Pickup - Waiver Response #5, #25, #35, #55, #62 exp 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.
 - **Response #41**
 - 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**
 - Including what elements of reviews can be done off-site and ways to assess elements usually observed on site.
 - State Agency will submit a report to USDA no later than one year after the State received the waiver.
- **SP 13-2020 – Q&A related to CNP Response #1-#3 Mealtime, Non-congregate Feeding and Meal Pattern Flexibility**
 - Extends waivers.
 - Allows operators to serve meals in bulk with instructions provided.
 - Impact Reports must be submitted within a year of the waiver.
 - All locations of meal service must be approved on the online agreement.

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- Local Program operators participating under the Meal Pattern Flexibility waiver 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 14-2020 Q&A #3 Guidance related to Meal Service during Coronavirus,**
 - **Meal delivery direct to homes:** Must be approved by State Agency
 - Allows direct to home delivery via mail or delivery service, and hand delivery by school staff, volunteers, community organizations or others.
 - Sponsor must obtain written consent from households and adhere to confidentiality guidelines.
 - Postage or delivery fees are allowable expenses.
 - Meals do not need to be shelf stable for meal delivery, but food safety requirements must be met.
 - Meal service times are waived.
 - Confirms SFAs may operate two programs if different meals are served.
 - Allows two meals per day, per child up to one week at a time.
 - SSO may serve one type of milk without a waiver.
 - Meals may be served during weekends and holidays.
 - Public notification of all sites is required.
 - Accommodations for limited English proficiency, language assistance or other special needs.
 - Sponsors may keep operations going even if schools implement SFSP or SSO and they are allowed to distribute multiple meals in conjunction with other programs.
- **Extend Area Eligibility and Area Eligibility for Closed Enrolled Sites – Waiver Response #14, #32, #48, #52, #60, #64 – expires June 2021**
 - Allows closed enrolled sites to determine site eligibility through area eligibility (instead of collecting income eligibility applications).
 - **Response #32, #52, #64**
 - Extends all individually-issued state waivers allowing SFSP and SSO sponsors **in good standing** to operate open summer meals sites located in areas that do not meet the definition of “areas in which poor economic conditions exist,” or areas where more than half of children are eligible for free or reduced-price meals.
 - States must continue to work with sponsors and operators to target benefits to children in need.
 - These flexibilities do *not* end as soon as the public health emergency ends.
 - **Response #32, #60**
 - States must continue to work with sponsors and operators to target benefits to children in need.
- **Meal Service Time Restrictions – Waiver Response #17, #50, #66 – Extended to June 30, 2021**
 - Waives meal service time parameters for SSO.
 - Sponsors are still required to establish meal service times for each site.
- **SP 15-2020 Q&A related to Meal Service**
 - The nondiscrimination statement must appear on informational materials.
 - Racial and ethnic data can be collected through school enrollment/ALSDE information/DHR-SNAP
 - Operators must make meal accommodations for participants with disabilities.
- **Food Service Management Company (FSMC) Contracts – Waiver Response #19 – Expired 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 18-2020 Q&A Provides clarification on Response. #14-17 Area Eligibility, Meal Service Time Restrictions**
 - Confirms that the meal service time waiver and non-congregate waiver allows for multiple meals.
- **SP 20-2020 Q&A related to requirements and elements of the law addressed by waiver**
 - Relates to transition to summer program, including completion of required application.
 - Waivers and flexibilities are extended.
 - Home deliveries should not treat each home as a site like stops on a mobile route are.
 - Meal delivery guidelines still apply.
- **SP 21-2020: Q&A Related to Food Service Mgt Contracts and Allowable Costs**
 - Provides guidance for allowable expenses and contract extensions.

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- Confirms that costs for meal deliveries are allowable and all such purchases must continue to meet the required criteria of being reasonable, allocable, and necessary.

- **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.

- **Waiver Response #56 Allows SSO Operations through December 2020; Waiver Response #59 through June 2021**
- **Response #57**
 - Nationwide Waiver to Allow Reimbursement for Meals Served Prior to Notification of Approval and provide Flexibility for Pre-Approval Visits in the SFSP-COVID-19 SSO/SFSP.
 - Q&As Relating to the Nationwide Waiver to Allow SFSP and SSO Operations through December 2020 - USDA SP 25-2020 SSO and SFSP

- **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.
 - Allows SFAs to operate NSLP/SBP at some schools and SSO at other schools.