# Feeding Children During An Unanticipated School Closure

ALASKA CHILD NUTRITION PROGRAMS

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## Overview of Today's Session

- Review the waiver process
- Review database systems
- Review basic meal program requirements

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# Why these federal child nutrition programs exist

To feed those most in need

Keep children healthy through the food we offer every day

Our programs teach children how to maintain a lifelong healthy diet

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# Waivers

## (new) Waiver Request for Alaska Statewide Non-Congregate Feeding/COVID-19

**Description of the challenge the State agency is seeking to solve, the goal of the waiver to improve services under the Program, and the expected outcomes if the waiver is granted. [Section 12(l)(2)(A)(iii) and 12(l)(2)(A)(iv) of the NSLA]:**

In preparation for the COVID-19, Alaska program sponsors are anticipating possible school and/o child care closures, as has been seen in other states. There are currently no cases of COVID-19 in Alaska; however, this remains an evolving situation.

CDC recommendations include social distancing in the mitigation of COVID-19, SFSPSSO regulations require consumption of meals at meal sites, increasing the potential of exposure among program participants. We are requesting a statewide waiver to be in place should COVID-19 cause closures and allow for program sponsors to establish non-congregate feeding sites.

**Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(l)(2)(A)(i) of the NSLA]:**

7 CFR 225.6(e)(15) "Maintain children on site while meals are consumed".

## Waiver Request for SFSP Unanticipated School Closure

- **Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(l)(2)(A)(i) of the NSLA]:**

The Alaska DEED CNP is requesting to waive statutory provision of Section 13(c)(l) of the NSLA (42 U.S.C. 1761(c)(l)) and 7 CFR 225.6(d)(l)(iv), to extend the option to operate the SFSP at school sites during unanticipated school closures.

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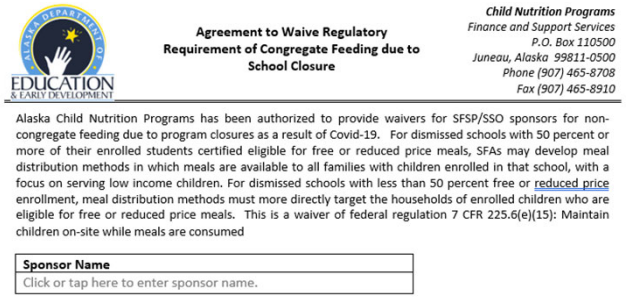
# Non-Congregate Feeding Waiver COVID-19

- Sponsor Name
- Site Name(s)
- F/RP Rate
- Meals to be Offered
- Meal Frequency
- Method of Delivery
- Targeting Low-Income not 50% or Greater Eligible



EDUCATION & EARLY DEVELOPMENT

**Agreement to Waive Regulatory Requirement of Congregate Feeding due to School Closure**

*Child Nutrition Programs*
*Finance and Support Services*
*P.O. Box 110500*
*Juneau, Alaska 99811-0500*
*Phone (907) 465-8708*
*Fax (907) 465-8910*

Alaska Child Nutrition Programs has been authorized to provide waivers for SFSP/SSO sponsors for non-congregate feeding due to program closures as a result of Covid-19. For dismissed schools with 50 percent or more of their enrolled students certified eligible for free or reduced price meals, SFAs may develop meal distribution methods in which meals are available to all families with children enrolled in that school, with a focus on serving low income children. For dismissed schools with less than 50 percent free or reduced price enrollment, meal distribution methods must more directly target the households of enrolled children who are eligible for free or reduced price meals. This is a waiver of federal regulation 7 CFR 225.6(e)(15): Maintain children on-site while meals are consumed

| **Sponsor Name** |
| --- |
| Click or tap here to enter sponsor name. |

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# Who Qualifies?

Sponsors where ≥50% of students are free/reduced and have participated in SFSP in 2018/2019:

School Districts where ≥50% of students are free/reduced but the district did not participate in SFSP in 2019:

School Districts where <50% of students are free/reduced and the building/district has not participated in SFSP (not SFSP eligible):

- In addition to the above, serve using a roster
- Target serving low-income children by opening buildings with highest F/R populations, if possible

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# FAQs

**Q. Are all school districts required to provide meals**

A. No. However, sponsors are encouraged to ensure that the needs of low-income children are met during extended school dismissals.

**Q. How many meals may be provided by the sponsor?**

Meal service options include one meal, two meals (not to include both lunch and supper), or one meal and one snack

**Q. May parents pick up meals on behalf of the students?**

A. No, however the State agency submitted a waiver request on March 13, 2020 to USDA FNS for approval; as of 3/18/20 this waiver has not been approved.

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# FAQs

**Q. May other children in the community receive meals provided by the school district, such as students returning from boarding schools, Head Start children, or other younger children?**

A. Yes. We encourage sponsors to maintain meal counts that include information about children not normally served. All meals are free.

**Q. Can I use my Fresh Fruit and Vegetable Program (FFVP) produce that has been delivered or is scheduled for delivery during the school closures?**

A. If at all possible, cancel all produce orders that have not been delivered to your school/district. If you currently have FFVP produce at the school/district you can use it in any child nutrition program meals that your school/district are serving during the school closures. You can claim the expenses on your March and April FFVP claim. Do not order additional food items with these funds.

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# FAQs

**Q. Can a school operate a feeding site that is currently not on NSLP under the SFSP option?**

A. Yes, however all staff responsible for the feeding and preparing of food must have SFSP training; full SFSP training is available through DEED eLearning at https://education.alaska.gov/ELearning.

**Q. What Free & Reduced-Price Rate (F/RP) would we use if we are a Community Eligibility Provision (CEP) site/district?**

A. There are multiple ways you can list you site percentage, you can use the Free and Reduce Price Report which lists each sites individual ISP and includes the 1.6 CEP multiplier, or you could look on the No Kid Hungry Mapper for each site to see if they are in a census area eligible location (http://bestpractices.nokidhungry.org/Averaged-Eligibility-Map)

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# FAQs

**Q. Can meals be served on Saturday and Sunday and reimbursed?**

A. Yes, under the SFSP meal program weekend meals are allowed. You would continue to follow the plan you submitted on your wavier as to which meals and follow the SFSP meal pattern. https://www.fns.usda.gov/sfsp/meal-patterns

**Q. Can we serve Family Meals?**

A. No; this program only provides meals to children.

**Q. What happens if a school resumes to a distance delivery model?**

Schools that have an enrollment of 50% or more students who are eligible for free or reduced-price meals may maintain the SFSP/SSO option; schools that have an enrollment less than 50% of free or reduced-price students will resume NSLP and meal counting/claiming will be done by category of eligibility.

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# FAQs

**Q. Why are these approved under Summer meals?**

The option to serve meals in the USDA programs during an unanticipated school closure is currently only available in the summer program; we used this option after the 2018 earthquake.

**Q. The approval letter indicates we may operate under SFSP or SSO, what is the difference?**

There are several differences, we do encourage you to review the full comparison chart to decide which mode you prefer:

https://fns-prod.azureedge.net/sites/default/files/SFSP_SeamlessComparisonChart.pdf.

Do note that the Seamless Summer Option (SSO) is a little easier to add in the database; the Summer Food Service Program (SFSP) will require much more information to be entered, but the SFSP has a slightly higher reimbursement rate. We cannot reimburse meals until the database is up-to-date.

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# What Questions Do You Have on the Waiver?

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## The Technical Piece – CNP Web

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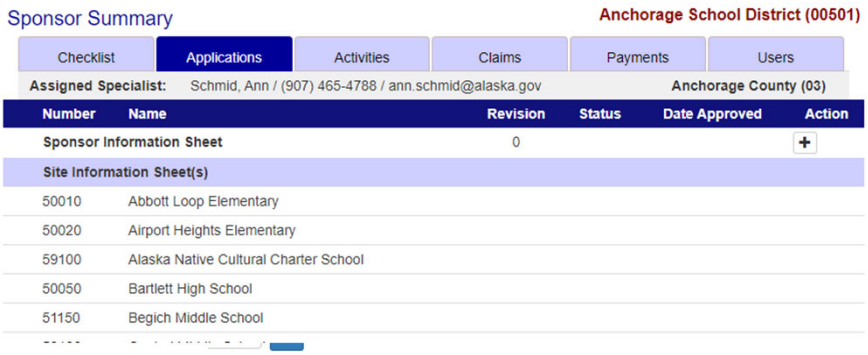
# CNPWeb Database

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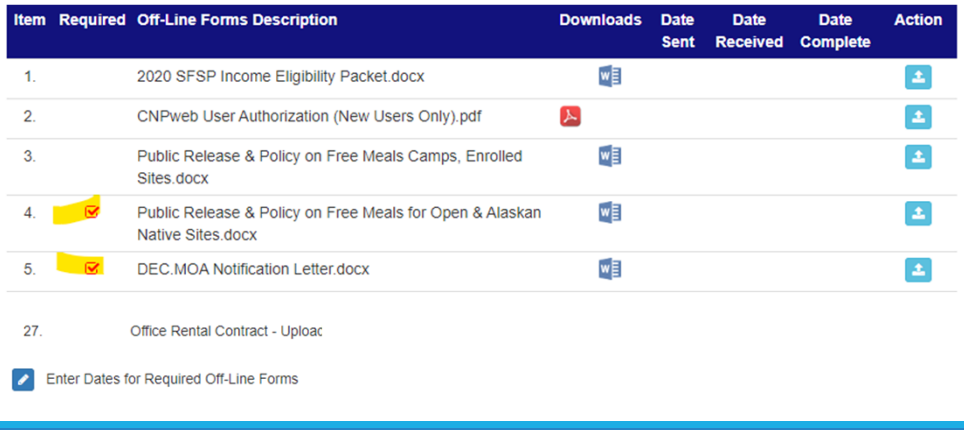
# CNPWeb

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# Sponsor Eligibility (Admin Guide P. 7-9)

- Program Sponsors currently in good standing in the NSLP, SBP, and CACFP
- Sponsors and sites that have successfully participated in SFSP in the previous year

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# 3 Options for Schools

1. National School Lunch Program for Summer School / School Breakfast Program (NSLP/SBP)
2. Seamless Summer Option (SSO)
3. Summer Food Service Program (SFSP)

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## Seamless Summer Option (SSO)

- Site eligibility same as SFSP
- SFA offers summer meals to the community; may sponsor school and non-school sites
- Must follow all NSLP meal patterns, regulations and monitoring requirements
- Reimbursement rates same as NSLP/SBP free rates

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## NSLP/SBP

- For schools serving meals only to children enrolled in academic summer school
- Must follow all NSLP and SBP meal patterns, regulations and monitoring requirements
- Receive reimbursements at the current NSLP/SBP rates
- Waiver Variation: If schools resume in a distance model, we may need to adopt this model in a non-congregate manner

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# Summer Food Service Program (SFSP)

- Site eligibility requirements dependent on site type
  - Open Sites >50% F/RP
  - Closed Enrolled Sites >50% F/RP
- Follow all SFSP meal patterns, monitoring requirements and regulations
- SFSP annual training and application required
- Sponsors receive the SFSP meal reimbursement rates (higher than NSLP/SBP)

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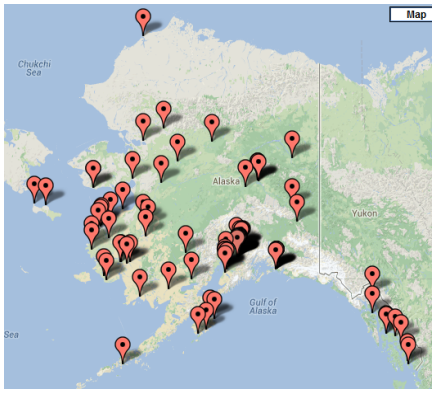
# SFSP Site Types & Eligibility (Admin Guide P. 12-17; 159-160)

There are 6 different types of SFSP sites:

1. Open Sites
2. Restricted Open Sites
3. Closed-Enrolled Sites
4. Camp Sites
5. Alaska Native Sites
6. Migrant Sites

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# Open / Restricted Open / Closed-Enrolled

**Open Sites**

- Located in areas where 50% or more of children are eligible for F/RP school meals
- Meals are available to all children on a first-come, first-serve basis

**Closed-Enrolled Sites**

Waiver variation:

Sites that do not meet the 50% F/RP eligibility may use this option for now

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# Site Eligibility Documentation (Admin Guide P. 18-22)

**Sponsors are responsible for determining and documenting the eligibility of the sites you are operating. Each site type may require different eligibility documentation.**

- EED template letter for AK Native/Migrant sites https://education.alaska.gov/cnp/sfsp
- AK NSLP Free and Reduced Price Eligibility Report https://education.alaska.gov/cnp/nslp

Census Mapping Tools:

- USDA Capacity Builder https://www.fns.usda.gov/capacitybuilder
- USDA Area Eligibility Mapper https://www.fns.usda.gov/areaeligibility
- FRAC Summer Food Mapper http://216.55.168.186/FairData/SummerFood/map.asp?command=scope&map=0
- No Kid Hungry Averaged Eligibility Mapper http://bestpractices.nokidhungry.org/Averaged-Eligibility-Map

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# Mapping Tools

**Area Eligibility**

USDA Area Eligibility

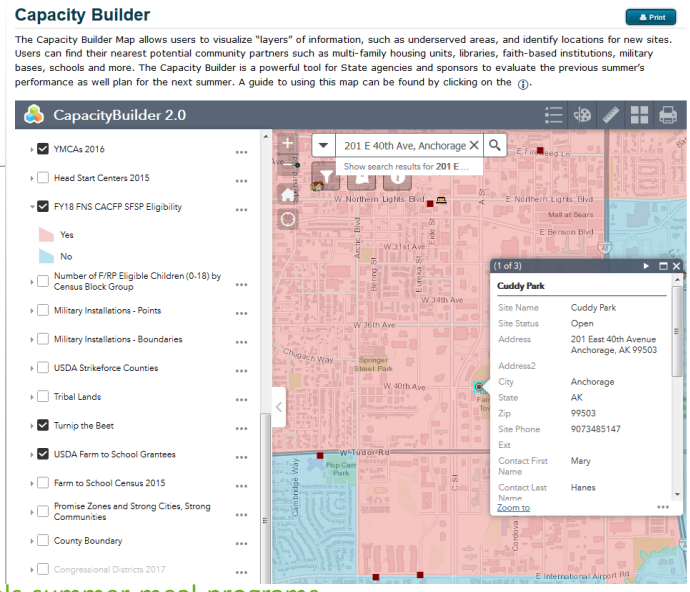
No Kid Hungry Averaged Eligibility

FRAC Summer Food Mapper

**Outreach**

USDA Capacity Builder →

USDA Summer Meals Site Finder




https://www.fns.usda.gov/sfsp/mapping-tools-summer-meal-programs

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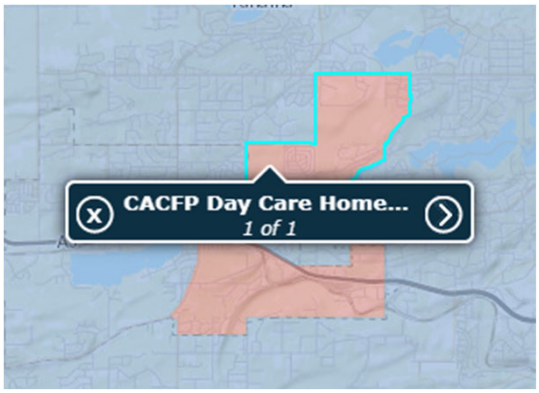
# CACFP and SFSP Area Eligibility Mapper

https://www.fns.usda.gov/areaeligibility

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CACFP Day Care Home (Tier I) and SFSP Summer Meal Site Eligibility for FY20: 021700010031

| | |
|---|---|
| GEOID | 021700010031 |
| State | Alaska |
| FY 2020 Area Eligible? | YES |
| CBG: Percentage of children (0-18) eligible for F/RP meals | 48.40 |
| CBG: Number of children (0-18) eligible for F/RP meals (Numerator) | 230.00 |
| CBG: Total children (0-18) (Denominator) | 475.00 |
| Percentage of children (0-12) eligible for F/RP meals | 56.80 |
| CBG: Number of children (0-12) eligible for F/RP meals (Numerator) | 210.00 |
| CBG: Total children (0-12) (Denominator) | 370.00 |
| Census Tract: Percentage of children (0-18) eligible for F/RP meals | 32.10 |
| Census Tract: Percentage of children (0-12) eligible for F/RP meals | 38.80 |

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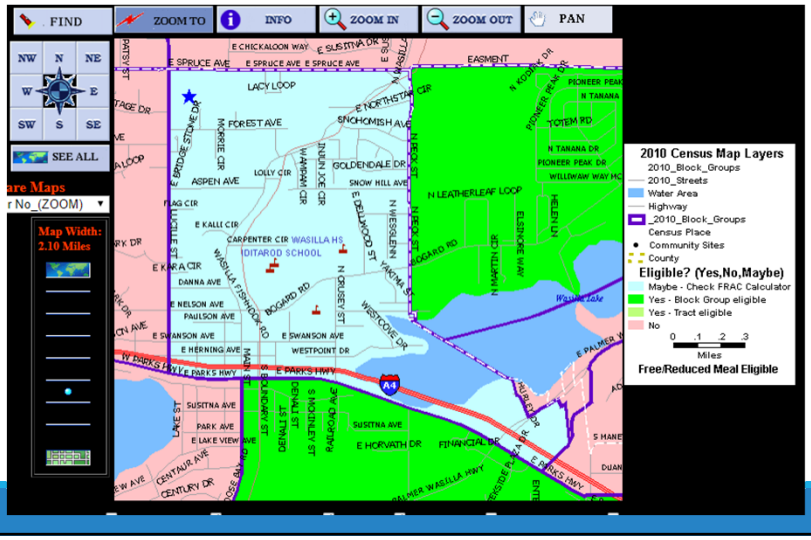
# FRAC Summer Food Mapper

http://216.55.168.186/FairData/SummerFood/map.asp?command=scope&map=0




Food Research & Action Center

Download FRAC Mapper Instructions (MSWord Document)

Download FRAC Adjacency Calculator (MSExcel Document)

**2020 FRAC Summer Food Mapper**

Default Map -- FY 2020 Free/Reduced Price Meal Eligible (2013-17 ACS)

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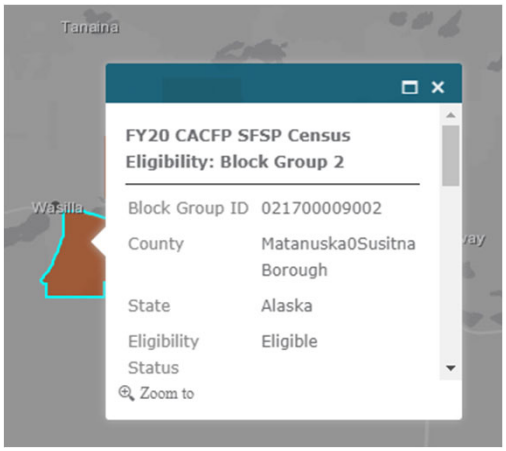
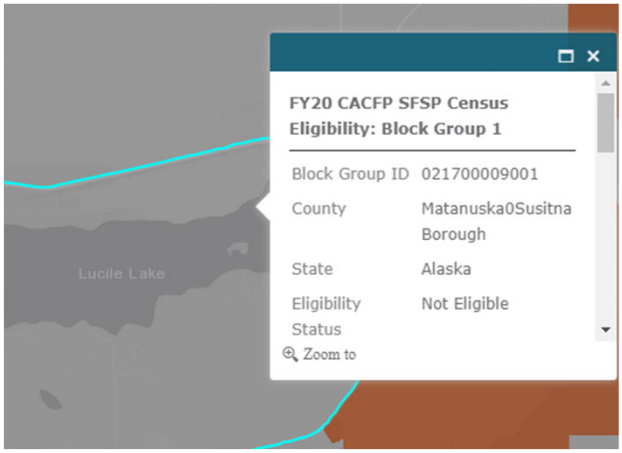
# No Kid Hungry-Averaged Eligibility Map

http://bestpractices.nokidhungry.org/Averaged-Eligibility-Map

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# Site Eligibility Documentation

**For school sites:**

- 50% or greater Free and Reduced-Price School Meal data
- Census/Area Eligibility: http://www.fns.usda.gov/capacitybuilder
- Waiver variation:
  - Sites that do not meet the 50% requirement must demonstrate targeted outreach to low-income families

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# Meal Basics

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# SFSP Meal Pattern Basics (Admin Guide P. 57-72)

- Meal Pattern Requirements
- Meal Service
- Special Needs in Child Nutrition

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# Meal Pattern Requirements

All meals served must meet the prescribed meal pattern requirements depending on which type of summer feeding program:

- **NSLP** – follow all NSLP meal pattern requirements
- **SSO** – same as NSLP
- **SFSP** – follow all SFSP meal pattern requirements, different than NSLP/fewer requirements
  - Option to follow NSLP meal pattern requirements, with approval by State Agency

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# Basic Summer Meal Pattern

**Simplified Summer Meal Pattern**

| Food Component | Breakfast (Select foods from all three required components) | Lunch or Supper (Select foods from all 4 of the required components) | Snack (Select 2 of the 4 components) |
|---|---|---|---|
| **Milk** | **1 cup (8 fl oz)** | **1 cup (8 fl oz)** | **1 cup (8 fl oz)** |
| **Vegetables and/or Fruits** | **½ cup** | **¾ cup** (must offer two items) | **¾ cup** |
| **Grains and Breads** | | | |
| Bread | **1 slice** | **1 slice** | **1 slice** |
| Roll, muffins, etc. | **1 serving** | **1 serving** | **1 serving** |
| Cold, dry cereal | **¾ cup or 1 oz** | **¾ cup or 1 oz** | **¾ cup or 1 oz** |
| Cooked pasta | **½ cup** | **½ cup** | **½ cup** |
| Cooked Cereal | **¼ cup** | **¼ cup** | **¼ cup** |
| **Meat/Meat Alternate** | **(Not required)** | | |
| Meat/Poultry/Fish | 1 oz | **2 oz** | **1 oz** |
| Cheese | 1 oz | **2 oz** | **1 oz** |
| Eggs | ½ large egg | **1 large egg** | **½ large egg** |
| Alternate Protein | 1 oz | **2 oz** | **1 oz** |
| Cooked dry beans or peas | ¼ cup | **¼ cup** | **¼ cup** |
| Peanut / Nut Butters | 2 Tbsp | **4 Tbsp** | **2 Tbsp** |
| Nuts/Seeds | 1 oz | **1 oz** (50% of serving) | **1 oz** |
| Yogurt | ½ cup | **1 cup** | **½ cup** |

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# NSLP & SSO vs SFSP Lunch Meal Pattern

**NSLP** (Lunch Meal Pattern – amounts are school grade dependent)

**Fruits/Vegetables (cup):** 1¼ - 1

**Grains (oz equivalent):** 1 ¼ - 2 slices/servings

**Meat/Meat Alternate (oz equivalent):** 1 ½ - 2

**Fluid Milk (cups):** ¾ - 1

*NSLP also has specific requirements for: colored vegetables, min-max calories, saturated fat, sodium, trans fat*

**SFSP** (Lunch Meal Pattern)

**Fruits/Vegetables (cup):** ¾

**Grains:** 1 slice/1 serving/ ½ cup

**Meat/Meat Alternate (oz equivalent):** 2

**Fluid Milk (cups)** – 1

*SFSP does not have any requirements in terms of colored vegetables, min-max calories, saturated fat, trans fat*

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# Allowable Meal Pattern Exceptions

**Infant Meals**
- Follow CACFP Infant Meal Pattern (7 CFR 226.20(b))

**Meals for children Age 1-6**
- May adjust portion sizes for younger children (7 CFR 226.20(c))

**Meals for children Age 12-18**
- May adjust portion sizes for older children (7 CFR 226.20(c))

**Meals prepared in Schools (NSLP, SFSP, SSO)**
- May use NSLP meal patterns (7 CFR 210.10 and 210.10(a))

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# Number of Meals & Meal Pattern

**School Food Authorities**

- SFSP Sponsors may use the SFSP meal pattern or NSLP meal pattern
- May serve up to **2 meals or 1 meal and 1 snack per day** in any combination except lunch and supper
- Waiver variation:
  - Meals can be provided at one time;
  - Meals can be provided for multiple days;
  - You must have a tracking method to ensure service isn't duplicated

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# Meal Service Times

- Meal service times are required and should be reasonable
- Meals must be served within the approved meal service times in order to be claimed for reimbursement
- Meals/Snacks may be served and claimed on weekends
- Meal time changes must be approved by the State Agency prior to implementing

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# Daily Meal Counts (Admin Guide P. 179; 182-187)

**Meal counts must be taken daily at the Point of Service (POS)**

Monthly/Weekly consolidate meal counts

- Establish a double check system to verify meal counts

- At sites that are not income eligible, a roster should be maintained to track eligibility

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# Adult Meals (Admin Guide P. 69)

**Program Adults**

- Meals may be served free to those adults working directly with the meal service at the site.

**Non-Program Adults**

- Do not work in any direct way with the meal service at the site. Sponsor or adult must pay the full cost of the meal (i.e. parents, teachers, community members, etc.)

USDA Handout "Serving Adults: What You Need to Know"
http://www.fns.usda.gov/sites/default/files/sfsp/SMT-AdultMeals.pdf

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# Special Needs in Child Nutrition (Admin Guide P. 59-60)

**Children with medical condition requiring a food accommodation**

- Must have medical statement on file with substitution from physician
- Site does not have a choice about accommodating – they must provide a substitution
- Substitution may be outside the same component group (follow the medical statement)
  - Only for disability - NOT an allergy or intolerance
- Meals are reimbursable as long as suggested substitute is offered

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# Special Needs in Child Nutrition

**Children with other dietary needs – allergies or religious reason**

- MUST have medical statement on file and has the option to substitute.
- If site substitutes within the same component group then the meal is claimable.
- If parent brings in the substitute ITEM within the same component group, then the site can claim the meal. If the child is allergic to many items on the menu, the parent can sub more than one item (within the same component groups), but the site MUST serve at least one item in order to claim the meal.
- In order to claim the meal the child must be served all components to meet the SFSP meal pattern.
- Dietary Preferences

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# Training

Staff should receive notification of training

- Date, time, location, and importance of training session

All staff trainings must be documented

- Date, name of attendees, and topics discussed

Separate trainings for staffing groups

- Administrative staff training
- Monitor personnel training
- Site staff training

***Sites may not operate until site staff have been trained***

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# Administrative Staff Training

Administrative staff training should cover:

- Basic program information
- How the program will operate within the framework of SFSP
- USDA/EED Civil Rights training
- Specific duties of monitors

*Monitors should attend both the Site and Administrative Trainings*

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# Site Staff Training

**Site staff training should cover:**

- How the site will operate
- Recordkeeping requirements
- Point of service meal counts
- Meal Pattern requirements
- Menu
- Use of leftover food
- Civil Rights
- Monitors responsibilities

***At least one trained site staff must be present during ALL meal services***

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# Civil Rights

- Sponsors must train **all** staff in Civil Rights using either:
  - DEED recorded PowerPoint
  - DEED eLearning http://www.eed.state.ak.us/ELearning/
- Document civil rights training on staff training agenda or print certificate from eLearning webinar
- And Just For All Poster

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# Nondiscrimination Statement

https://www.fns.usda.gov/cr/fns-nondiscrimination-statement

**USDA Nondiscrimination Statement (Continued)**

**For all other FNS nutrition assistance programs, State or local agencies, and their subrecipients, must post the following Nondiscrimination Statement:**

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: How to File a Complaint, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Short statement

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# DEED CNP Contacts

Non-Congregate Feeding Waivers

| | | | |
|---|---|---|---|
| Schools | Elizabeth Seitz | Elizabeth.seitz@Alaska.gov | 907-465-8709 |
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| CNP Web & SFSP | Rhonda Biles | Rhonda.biles@Alaska.gov | 907-465-4788 |
| CNP Web | Jennifer Cherian | Jennifer.Cherian@Alaska.gov | 907-465-4969 |
| CNP Web | Debbie Soto | Debbie.soto@Alaska.gov | 907-465-8712 |
| Anything at all | Jo Dawson | jo.dawson@Alaska.gov | 907-465-8708 |

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# Feeding Children During An Unanticipated School Closure

ALASKA CHILD NUTRITION PROGRAMS

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