

Child Nutrition Program Operations During School Year 20-21

Frequently Asked Questions



COLORADO
Department of Education

About

This document includes frequently asked questions (FAQs) and guidance related to child nutrition program operations during the 2020-21 school year. Unless otherwise noted, the guidance applies to both the Summer Food Service Program (SFSP) and National School Lunch Program (NSLP).

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Child Nutrition Program Waivers and Implementation

1. What waivers are currently in place for school year 2020-21 for the Summer Food Service Program (SFSP)?

The U.S. Department of Agriculture nationwide [waivers](#) were extended on October 9, 2020 for the Summer Food Service Program. The waivers allow for the following flexibilities for the SFSP through June 30, 2021.

- **Summer Food Service Program and Seamless Summer Program Operations through June 30, 2021:** The passage of the continuing resolution by Congress granted authority and funding to extend school meal waivers through June 30, 2021.
- **Area Eligibility:** allows meals to be served at meal sites in areas that do not meet the 50 percent eligibility requirement.
- **Non-congregate Feeding in the Summer Food Service Program and Seamless Summer Option:** Allows for off-site consumption of meals and serving models like grab-n-go, curbside pick-up, mobile/bus routes, and home delivery.
- **Meal Service Time Flexibility:** Provides flexibility for serving times for SFSP and SSO. Allows for serving multiple meals at once and/ or serving meals for multiple days at the same time. Sponsors must still establish meal service times or delivery times
- **Parents and Guardians to Pick Up Meals for Children:** Allows parents/guardians to pick-up meals and bring them home to their children.
- **Meal Pattern Flexibility in the Child Nutrition Programs:** Allows sponsors to claim for reimbursement even if a meal does not meet all meal pattern requirements or include all meal components. Sponsors can apply for an exemption by completing this [form](#). Requests must be targeted and justified based on plans to support access to meals while minimizing potential exposure to COVID-19.
- **Offer Versus Serve Flexibility in the Summer Food Service Program:** Allows offer versus serve to be used with the SFSP meal pattern. All SFSP sponsors have the option to implement offer versus serve.
- **Allow Area Eligibility for Closed Enrolled sites in the Summer Food Service Program and Seamless Summer Option:** Closed enrolled sites may determine eligibility through area eligibility rather than collecting income eligibility applications.
- **First Week Site Visit Waiver for the Summer Food Service Program:** Sponsors are not required to visit each of their sites at least once during the first week of operation. This waiver applies to sites that successfully operated the SFSP in the previous year and SFSP sponsors in good standing that participate in the CACFP or NSLP.
- **Reimbursement for Meals Served Prior to Notification of Approval and Flexibility for Pre-approval Visits:** Allows state agencies to reimburse SFSP sponsors for meals served prior to the sponsor receiving written notification that the sponsor or site has been approved for participation in the program. Also waives the requirement for state agencies to conduct pre-approval visits of SFSP sponsors and sites.

2. What waivers are currently in place for school year 2020-21 for the National School Lunch Program (NSLP)?

The U.S. Department of Agriculture nationwide [waivers](#) were extended on June 25, 2020 for the National School Lunch and School Breakfast Programs. The waivers allow for the following flexibilities for the NSLP and SBP:

- **Non-congregate Feeding in the Child Nutrition Programs:** Allows for off-site consumption of meals and serving models like grab-n-go, curbside pick-up, mobile/bus routes, and home delivery.
- **Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program:** Allows for serving multiple meals at once and/ or serving meals for multiple days at the same time. Sponsors must still establish meal service times or delivery times



- **Parents and Guardians to Pick Up Meals for Children:** Allows parents/guardians to pick-up meals and bring them home to their children.
- **Meal Pattern Flexibility in the Child Nutrition Programs:** Allows sponsors to claim for reimbursement even if a meal does not meet all meal pattern requirements or include all meal components. Sponsors must contact CDE School Nutrition for approval to use this waiver for school year 2020-21. Requests must be targeted and justified based on plans to support access to meals while minimizing potential exposure to COVID-19.
- **Offer Versus Serve Flexibility for Senior High Schools in the National School Lunch Program for School Year 2020-21:** Eliminates the requirement for senior high schools participating in the NSLP to implement offer versus serve. Allows schools to serve individually plated meals and enables schools to offer complete meals for delivery or pickup for students doing remote learning.
- **Fresh Fruit and Vegetable Program Waivers:**
 - Parent Pick Up Waiver: allows a parent or guardian to pick up FFVP produce for their children, as long as accountability and integrity of the program are protected. Parents and guardians can pick up the produce through the end of school year 2020-21.
 - Alternate Location Waiver: allows FFVP foods to be served at an alternate pick up location if the approved FFVP site is closed due to COVID-19. This waiver may be used in conjunction with the FFVP parent pick up waiver. This waiver is in place until June 30, 2021.

Child Nutrition Program Options During School Year 2020-21

1. Are sponsors required to participate in the Summer Food Service Program?

Under the [COVID 19- Child Nutrition Response #56](#), school food authorities may choose to serve meals through the SFSP or SSO or may opt to participate under the National School Lunch and School Breakfast Programs. This waiver does not require school food authorities to transition to SFSP or SSO operations. The passage of the continuing resolution by Congress granted authority and funding to extend school meal waivers through June 30, 2021.

2. Where can sponsors learn more about the SFSP requirements?

More information about the SFSP can be found on the School Nutrition [SFSP webpage](#). For claim questions, contact: free&reducedpriceschoolmeals@cde.state.co.us. For general SFSP questions, contact: summermealprogram@cde.state.co.us.

3. What is the difference between the Summer Food Service Program and the Seamless Summer Option?

The main differences relate to the reimbursement rates, meal counting and claiming, and meal pattern requirements. A summary of program requirements for each program can be found in this [comparison chart](#).

SSO: All eligible meals provided are reimbursed at the NSLP/SBP applicable free rate and the NSLP/SBP meal pattern must be followed. Meals are counted and claimed based on student eligibility status (free, reduced, paid).

SFSP: All eligible meals provided under the SFSP are reimbursed at the established [SFSP rate](#) and any child 18 years and younger may receive a free meal. Sponsors do not need to track meals served by student eligibility

status. School Food Authority sponsors have the option to follow the NSLP/SBP meal pattern or the SFSP meal pattern. All other sponsors must follow the SFSP meal pattern.

4. Can sponsors operate the Summer Food Service Program for remote learning and the National School Lunch Program for in-person learning?

Yes. Based on guidance issued in the [USDA Q&A](#) released on Sept. 11, 2020, state agencies may approve SFAs to operate different child nutrition programs based on the needs of each school.

5. Can sponsors operate the Afterschool Snack Program at sites serving meals under the Summer Food Service Program?

Yes. Based on the USDA Q&A released on Oct. 14, the NSLP Afterschool Snack Program may operate simultaneously with the SFSP/SSO during implementation of *Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through School Year 2002-2021- Extension, October 9, 2020*. However, in no circumstances may children receive more than the numbers of reimbursable meals allowed in each program for which they are eligible. Although schools generally must operate the NSLP in order to operate the NSLP Afterschool Snack Program, FNS recognizes that for the duration of operations under the waiver, schools may be serving breakfasts and lunches through SFSP/SSO.

6. Can sponsors operate the Fresh Fruit and Vegetable Program at the same time as the Summer Food Service Program?

Yes. Sites can continue to provide FFVP during the SFSP.

7. Can sponsors operate the Special Milk Program at the same time as the Summer Food Service Program?

Sponsors are allowed to offer the Special Milk Program to a group of students if they are not receiving meals through the SFSP. For example, a Pre-K class could receive milk if they are not able to access meals served through the SFSP at a site.

8. Can sponsors operate the Child and Adult Care Food Program At-Risk Afterschool Meals Program at the same time as the Summer Food Service Program?

Yes. The same site can operate SFSP and also operate the CACFP At-risk Afterschool program as long as detailed records are kept on each program. Up to 2 meals per child can be provided through the SFSP during the school day and up to 1 meal and 1 snack can be provided through the CACFP At-risk Afterschool program after the school day ends. For more information about how to apply for the CACFP At-risk Afterschool program, [contact](#) Meghan George-Nichols at the Colorado Department of Public Health and Environment (CDPHE).

9. Can sponsors switching to SFSP operations provide snack through the extended At-risk Afterschool program?

Yes, sites that elect to operate SFSP and meet the criteria of extended day may [contact](#) Meghan George-Nichols at CDPHE to apply for the extended day at-risk afterschool program.

10. If students are enrolled in remote learning in addition to attending child care during the school day, can the student receive meals from the SFSP and CACFP?

Students enrolled in remote learning for school in addition to child care have the option to receive meals through their school meal site or child care center during school hours. Parents or guardians can choose which

child nutrition program to receive meals from when their child is enrolled in remote learning for school and child care on the same day. The meal site could work with the school district to receive grab and go SFSP meals, the parent/guardian can pick-up meals for the child to bring to the child care center, or the meal site may be able to operate the SFSP during the school day. It is not allowable for a child to receive a meal from their school meal site and participate in the same CACFP meal service at the child care institution.

11. What are the outreach requirements for sponsors in the SFSP?

Sponsors are required to promote the availability of open sites to the community. Sponsors can use this [SFSP Outreach Toolkit](#) to promote the availability of summer meals in the community. All materials may be tailored to meet local needs.

12. What are the training requirements for sponsors and staff in the SFSP?

Sponsors are required to annually complete SFSP training. Sponsors who already completed training once during program year 2020 do not need to complete it again. Sponsors who have not yet completed training can view the September 24 training webinar on the [SFSP training webpage](#). Sponsors must maintain a copy of the certificate as proof of completing training.

Site staff, including volunteers and teachers, must also complete training annually. Site staff may watch the September 24 training webinar, or complete the self-study guide listed on [this](#) webpage. Sponsors will want to be sure to train any new staff involved in the SFSP throughout the school year.

Applications

Summer Food Service Program (SFSP)

1. What sponsors are eligible to participate in the Summer Food Service Program?

A sponsoring organization must be a public or private non-profit school food authority (SFA); a public or private non-profit college or university; a public or private non-profit residential summer camp; a unit of local, county, municipal, State, or Federal Government; or any other type of private non-profit organization. All sponsors must also be tax exempt and must demonstrate the administrative and financial ability to manage a food service effectively. SFAs that have not participated in the SFSP in the previous year are eligible to participate this fall.

2. How do sponsors apply to participate in the Summer Food Service Program?

Sponsors that choose to operate the SFSP this fall must complete this [survey](#). CDE School Nutrition will use this information to complete the 2020 SFSP application on your behalf. Sponsors will need to complete a new SFSP application in the Child Nutrition Portal beginning in October in order to enroll in the new SFSP program year. Sponsors can view a [webinar recording](#) that provides instructions on applying and claiming in the new system.

3. If multiple meals are provided at one time, what days are selected for operating days of the week?

Using the calendar feature, sponsors will select each day of the week they serve meals or intend to serve meals. For example, if 5 days' worth of meals are provided on Mondays, select Monday through Friday as operating days each week.



4. How do sponsors enter eligibility information in the site application for sites that do not meet the 50 percent eligibility requirement?

If a site is operating under the area eligibility waiver, sponsors select 'school data' as the eligibility method in question 18, then in question 20 select 'Attendance area eligible- eligible based on another site' and select 'other' at the bottom of the site list. In the 'other' text box write: 'Site is operating under area eligibility waiver'.

5. Do sponsors need to enter a new site application for a mobile site that is only operating for a short period of time?

No. If the sponsor will only operate a mobile site or mobile route for a short period of time, for example during a scheduled holiday break or due to a school closure, a new site application does not need to be added. In this instance, the sponsor would claim meals served at the mobile site(s) from the site normally in operation or where those meals are prepared. Sponsors should ensure that families know the location, meal distribution times, and operational days of the week.

National School Lunch Program (NSLP)

1. How do sponsors apply to participate in the National School Lunch and School Breakfast Programs?

Sponsors will [apply](#), as normal, through the Child Nutrition Portal. Organizations interested in becoming a School Food Authority and applying as a new sponsor organization can contact [Kerri Link](#).

2. Do sponsors need to update their National School Lunch and School Breakfast Program site applications if schools change from in-person to remote learning meal service operations throughout the year?

No. Sponsors should complete site applications as normal, following these [instructions](#). For example, a school that has 5 instructional days per week will check Monday through Friday for days of the week meals are served in the site application even if the school may change to distributing multiple meals only certain days of the week.

3. If schools extend the time for meal service, do the changes need to be indicated in the National School Lunch and School Breakfast site applications?

Yes. Meal service times or delivery times need to be indicated in the site applications. School Nutrition recommends adding buffer time to the beginning and end times in the site applications so sponsors do not need to update as frequently.

4. If a school typically operates a 4-day school week but plans to have instructional time occurring on the 5th day does the site application need to be updated?

Yes. In this instance, Monday through Friday will be checked for the days of the week meals are served in the site application.

5. Do sponsors need to add a meal type to their school meal application if students will have access to meals their school did not provide last year? For example, the school site previously did not offer breakfast or snack but students will now have access to grab-n-go breakfasts or snacks.

Yes. If students will have access to a meal type that their school did not previously offer, the meal type must be added to the site application. Meal types served must be added to the site application in order to claim the reimbursable meals served.

Meal Site Eligibility

1. What types of meal sites can be operated under the SFSP?

Sponsors may operate the SFSP at one or more sites, which are the actual locations where meals are served. There are three common types of sites: open sites, closed enrolled sites and camp sites. Based on the USDA [COVID-19: Child Nutrition Response #52](#), open and closed-enrolled sites are not required to meet the 50 percent eligibility requirement when need is identified in the community.

2. What type of SFSP sites should the sponsor apply for?

Sponsors have the option to determine which type of site will work best to meet the needs of their students and community. Sites may apply as closed-enrolled and provide meals only to students enrolled for learning through the meal site. For example, a closed-enrolled site may be beneficial for schools offering in-person learning only. Sponsors may also apply for open or restricted open sites when implementing hybrid meal services, such as meals in the classroom and parent pick-up. Open, restricted open, and closed-enrolled sites do not need to meet the 50 percent eligibility requirement when need is identified. Sponsors may change site types based on changes to the learning structure, if needed. For example, operate an open site if students switch to remote learning.

3. How are sites approved when competing for the same geographical area?

When determining which sites are approved to serve an area, state agencies are required to give priority to:

- Local SFA sponsors
- Government and private non-profit sponsors that have successfully operated in the prior year
- New government sponsors
- New private non-profit sponsors

4. What is considered a SFSP site?

The SFSP site is the physical location meals are served. Sponsors will need to have a site application in the Child Nutrition Portal for each meal site.

Menu Planning

1. What meal patterns must be followed for the SFSP?

School Food Authority sponsors have the option to follow the [SFSP meal pattern](#) or the NSLP/SBP meal patterns. All other sponsors must follow the SFSP meal pattern.

2. Are sponsors able to apply for a meal pattern exemption waiver?

Yes. Sponsors that are unable to meet the SFSP meal pattern can apply for a meal pattern exemption by completing this [form](#). Requests must be targeted and justified based on plans to support access to meals while minimizing potential exposure to COVID-19.

3. If meals are prepared at one school's kitchen and transported to other meal sites, are the meals considered self-prep or vended?

Meals prepared at a central kitchen and delivered to a site(s) or meals prepared at the site are considered self-prep. Meals are considered vended if the unitized meal (with or without milk) is purchased from a third party vendor, such as a [registered meal vendor](#), or another sponsor. If the sponsor contracts with a [Food Service Management Company](#) year-round to manage their food service program, the meals are considered self-prep.

4. Are sponsors allowed to use salad bars in the SFSP?

It is at the discretion of the sponsor if salad bars are used. Sponsors should work with their local health department and school administration to determine the safest and most appropriate route.

5. Are sponsors required to serve two different types of milk in the SFSP?

No. There is no requirement to serve two different types of milk and milk may be of any fat type or flavor (e.g. skim, 1%, 2%, whole).

6. What are best practices for menu planning for the 2020-21 school year?

- Identify which NSLP and SBP menu items fit your staffing capacity and planned meal service model(s).
- When possible, simplify and shorten cycle menus. For example, identify the top 10 entrees that can be used in a 2-week cycle menu.
- Communicate with school administrators to determine which meal service model will work best for schools. For example, meals in the classroom, grab and go or parent pick-up models.
- Be sure to consider food transportation needs and food safety practices.
- Include vegetable subgroups within the cycle menu if salad bars are not used. For example, determine the top 2-3 vegetables in each subgroup for rotation and backup.
- Plan to assess menus often to encourage participation. Recipes for school nutrition can be found on the [menu planning webpage](#).

7. Which production records are required for the SFSP?

Sponsors may use either the [NSLP/SBP production record](#) or the [SFSP production record](#). Production records are required for the SFSP.

8. If a sponsor sells a la carte items, do they need to follow Smart Snacks regulations?

Sponsors may sell a la carte food and beverages as long as the sites continue to meet smart snack and competitive food requirements. Specific guidelines and policies can be found on the [CDE School Nutrition website](#). Your school wellness policy may also require that foods sold adhere to Smart Snack regulations, and sponsors are still required to follow their wellness policy.

9. For sponsors operating NSLP: will schools be able to serve the same meal to all students if age/grade groups are co-mingled?

The menu must meet the meal pattern requirements for each age/grade group. Sponsors that are unable to meet the meal pattern can apply for a meal pattern exemption by completing this [form](#). Requests must be targeted and justified based on plans to support access to meals while minimizing potential exposure to COVID-

19. The meal pattern does allow for an overlap of menu quantities for K-12 at [breakfast](#) and K-8 at [lunch](#). Additionally, if preschoolers are not co-mingled with other students they will need to follow the [preschool meal pattern](#).

10. For sponsors operating NSLP: are sponsors required to provide a variety of milk options with each meal service?

No. The Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs – Extension 5 released on October 9, 2020, waives the requirement at 7 CFR 210.10(d)(1)(i) and 220.8(d) that schools must offer students a variety (at least two different options) of fluid milk. All other fluid milk requirements remain in effect. Sponsors may apply for a meal pattern exemption for milk variety or other milk requirements by completing this [form](#). Sponsors are encouraged to maintain and meet the nutrition standards for each Program to the greatest extent possible.

Civil Rights/Special Dietary Needs

1. Is the And Justice for All Poster required to be in each classroom if meal service is not taking place in the cafeteria?

The And Justice for All Poster is not required to be in each classroom. The poster must be visible to participants in the school building. If participants will not have access to the poster in the cafeteria (e.g. meal service only in the classroom), best practice would be to have the poster visible at the school building entrance. A pdf printable version of the poster can be found on [CDE School Nutrition website](#). As a best practice this school year, the poster should be printed in color and the correct size (11"x17").

2. Is the And Justice for All Poster required to be visible at each mobile stop or at an outdoor grab-and-go station?

Yes. The And Justice for All Poster is required to be visible at each meal site location. As a best practice this school year, the poster should be printed in color and the correct size (11"x17").

3. If meals are being served in the classroom, do teachers need to complete civil rights training?

Teachers must complete Civil Rights training if they are involved in the service of or counting and claiming of meals. If meals are being consumed in the classroom but the teacher is not involved in any other capacity, training is not required. The sponsor must track all training. Training formats, such as the Meals in the Classroom Teachers Training memo, self-study guide and PowerPoint slide deck can be found on [CDE School Nutrition website](#).

4. Are schools required to accommodate special dietary needs when meals are served in the classroom or there are grab and go options?

Sponsors are required to continue to accommodate special dietary needs regardless of the meal service model. Best practices to consider include:

- Use a consistent process to separate and identify special dietary meals and communicate to all who will be involved with meal service; for example, teachers serving meals in the classroom.



- Assess menus to make sure accommodations can be made within a modified cycle menu, if applicable. For example, if the salad bar was previously used to accommodate many special diets, different products may need to be added to the menu.
- Assess the district's special dietary needs policy to ensure it still meets the needs of the sponsor and families. For example, if you did not allow special dietary needs forms to roll over from year to year previously, you could consider allowing it to streamline paperwork.
- Identify communication needs with school administrators, teachers, and parents. Resources can be found on the [special dietary needs webpage](#).

5. Are sponsors required to complete the Ethnic/Racial Data form at SFSP sites?

Sponsors are required to complete the [Ethnic/Racial Data Form](#) once at each SFSP site during its operation. If the sponsor completed the form at any time during 2020 for a site, the form does not need to be completed again. Additionally, if the school district is collecting this information at a SFSP site during enrollment (e.g. through the collection of Free and Reduced meal applications) the sponsor would not have to complete the Ethnic/Racial Data form at that site. If sponsors are unable to complete the form due to the parent/guardian pickup waiver, please document that information for that site.

Procurement

1. What procurement flexibilities are available to purchase new food and supplies for the 2020-21 school year?

- Informal procurement methods (small purchase and micro-purchase) may be used if district/sponsor purchasing policies allow. For more information on methods of procurement, visit the [CDE School Nutrition Unit's Procurement Web Page](#).
- Work with your purchasing department or cooperative purchasing group to add new products to existing contracts if possible. New products can be added if adding those products is not a material change to the contract.
- Procurement without a competitive process may be used when a public emergency will not permit a delay resulting from a competitive solicitation (when you need the goods or services immediately). For non-competitive procurement, the district can negotiate directly with one vendor instead of soliciting multiple quotes, bids, or proposals. Non-competitive contracts cannot be longer than one year in length.

2. How do sponsors communicate with food vendors when they are unsure what products are needed for the 2020-21 school year?

- Be upfront and establish an open line of communication with your distributors, vendors, and brokers about your upcoming needs and unknowns.
- Use participation data from this past spring and summer to estimate quantities needed for the fall.
- Consider procuring products from local producers to shorten the supply chain.

3. Can sponsors purchase vended meals to use to supplement meals prepared by staff or if staff are sick and unable to prepare meals?

- Yes, vended meals (unitized meals with or without milk) can be purchased only from a vendor that is registered with the CDE School Nutrition Unit.
- Sponsors may use a noncompetitive, one-year contract to purchase vended meals for the 2020-21 school year.
- Contact Megan Johnson at johnson_m@cde.state.co.us for more information or to obtain the contract template.
- For more information on vended meals, visit the [FSMC and Vended Meals Web Page](#).

Meal Counting and Claiming

1. Are sponsors allowed to feed all kids for free or do meals need to be claimed based on the student's eligibility status?

Under the SFSP, all reimbursable meals served are free. Sponsors do not need to track meals based on the student's eligibility status.

Under the National School Lunch (NSLP) and School Breakfast Programs (SBP), meals must be claimed by the student's eligibility status (free, reduced, or paid), unless the school participates in a provisional program, such as the Community Eligibility Provision (CEP). Sponsors may also use money from the general fund to cover the cost for paid student meals if they wish to provide free meals for all students. Meals served at no cost will need to be tracked and claimed according to eligibility status.

2. Can meals be provided to children not enrolled in the school district?

Yes. If the site is operating as an open site, all SFSP requirements apply and the site's meal service must be open to the children in the community.

3. How do sponsors accurately record and claim meals under the SFSP?

Sponsors must establish a point of service and record meals as they are served. Sponsors may use a [paper form](#) or their electronic point of service system to record meals by meal type each serving day.

4. If sponsors use an electronic point of service system, how do sponsors ensure the point of service system meets SFSP claim requirements?

Sponsors may use an electronic point of service system for SFSP but must ensure that students are not charged for a meal and count and claim all student meals at the free rate. Additionally, SFSP is open to all children age 0-18 and a child cannot be denied a meal if they are not in the system. The sponsor must determine a way to count and claim these meals (e.g. student visitor meal option).

5. How do sponsors record meals when multiple meals are distributed?

Sponsors can count meals on the day they are distributed for each meal type served. Sponsors are not required to have separate meal count forms for the days meals are intended to be eaten. For example, if 3 days' worth of meals are served, a sponsor will have one breakfast meal count form and one lunch meal count form that shows 3 days' worth of meals distributed at that site.



6. How do sponsors record meals when providing meals to one group of students in the school building and also providing grab-n-go meals for other students at the same site?

Sponsors must track meals served separately to these groups of children. The sponsor would track meals served on a meal count form, for each meal type served, to students receiving meals in the school building and use separate meal count sheets for students receiving grab-n-go meals.

7. Is the USDA waiver to allow SFSP retroactive to the beginning of the school year?

Yes. Based on guidance issued in the [USDA Q&A](#) released on Sept. 11, 2020, SFAs approved to participate in SSO/SFSP during the fall months may claim meals served at the beginning of the school year under SFSP or SSO rather than through NSLP/SBP. However, any student who paid for their meals must receive a refund for their meal payments.

8. Do sponsors need to claim meals served in August under SFSP or NSLP/SBP?

Based on guidance issued in the [USDA Q&A](#) released on Sept. 11, 2020, SFAs approved to participate in SSO/SFSP during the fall months may claim meals served at the beginning of the school year under SFSP or SSO rather than through NSLP/SBP. However, any student who paid for their meals must receive a refund for their meal payments.

9. What do sponsors need to do if they want to claim under SFSP in August but originally indicated they wanted to start operating the SFSP in September?

If sponsors need to update the start dates for the SFSP please email summermealprogram@cde.state.co.us and indicate the correct meal service start date. CDE School Nutrition will follow up to update the information.

10. What methods can sponsors use to track student meals for meals in the classroom?

Teachers may complete the [SFSP daily meal count form](#), a simplified meal count form, or sponsors may use their point of service program. If a point of service program is used, a best practice is to provide a laminated classroom sheet with a dry erase marker for teachers to mark meals and then return to school nutrition staff to enter meal counts into the electronic POS.

11. Can intended days come before the operating day in which meals are served? For example, can meals provided on a Friday be counted and claimed for the preceding Wednesday and Thursday?

No. Meals cannot be given for preceding operating days and then be backdated for claiming purposes. The site has the option to offer meals at the end of a week for intended days the following week as long as all food safety measures and precautions are followed. "Intended days" are the days intended for the meals to be consumed.

12. If a sponsor is new to operating the SFSP, when can they enter claims?

Sponsors will receive an automatic email from the Colorado Nutrition Portal when the SFSP application has been approved. Once the sponsor receives the approval email, the sponsor can enter claims and make any needed application changes. For questions please contact summermealprogram@cde.state.co.us.

13. If a sponsor submitted an August SFSP claim for meals served before the school year started, how can the claim be adjusted to add meals served under SFSP after the school year began?

Once the sponsor receives a notification from the Colorado Nutrition Portal that the SFSP application has been updated, the sponsor can revise the submitted claim to include meals served under the SFSP after the school year began. Sponsors can revise claims for up to 60 days past the end of the claiming month.

14. How can sponsors ensure the integrity of the program is upheld when multiple service methods are provided (e.g. students have access to in-person meal service as well as grab-n-go sites)?

To the greatest extent possible, communications must be provided to households explaining how many meals each student is allowed to receive per day (one per meal type; per child; per day). Best practices also include posting signage at meal service sites indicating that accepting more than one meal per intended service day is prohibited. Although not required, the analysis of a site's Average Daily Meals can also serve as a daily edit check to ensure the number of meals serves is not grossly inflated.

15. For sponsors operating NSLP: how do sponsors claim meals for students that may be enrolled in other schools?

Similar to standard NSLP counting and claiming procedures, students receiving a school meal should be claimed at the school site in which they are enrolled and meals must be claimed based on the student's eligibility status. As best practice, meals should be claimed based on the school the student is enrolled in. It is important to claim students at their enrolled site because this affects future severe need reimbursement rate, provisional program eligibility, and breakfast after the bell participation (for more information see the [Meal Counting and Claiming back-to-school guidance](#)). If that is not feasible, and your tracking system allows, meals may be claimed by the school the student ate at or picked up a meal from. It is also important to ensure the system to track and claim meals does not allow duplicate meals to be claimed.

16. For sponsors operating NSLP: how do sponsors accurately record and claim meals when parents or guardians pick up meals for their children?

Sponsors are encouraged to have a procedure in place ensuring the students are in attendance of the school by either requesting a student ID or student name. Meals can then be tracked and claimed accordingly by that student name or ID. Ensuring meals are tracked by students will mitigate students receiving more than one breakfast and/or lunch per day.

17. For sponsors operating NSLP: are meals provided for future days allowed to be counted and claimed for reimbursement if a student is absent from distant learning one or more days during that timeframe?

When a district provides meals for future days, the intent is the student will be learning/in attendance remotely during those days. In good faith, the food service worker provided those meals on the service day (this is the Point of Service) and the meals are allowed to be counted and claimed regardless of the student's attendance. Accountability for the meal is at the Point of Service and stops there.

Meal Service

1. What meals can be served under the SFSP?

Sponsors may serve up to two meals a day at open and enrolled sites. Allowable meal types include: breakfast, AM snack, lunch, PM snack, and supper. Sponsors may choose which combination of meals they would like to serve; however, serving lunch and supper on the same day is not allowed.

2. Can sponsors feed kids through a grab-and-go concept?

Grab and go is an allowable meal service method under the Nationwide Waiver to allow Non-congregate Feeding in the Child Nutrition Programs.

3. Is Offer versus Serve allowable with the SFSP meal pattern?

Yes, offer versus serve is allowable with the SFSP meal pattern and any SFSP sponsor has the option to implement this menu planning method. Sponsors are not required to implement offer versus serve.

4. Are sponsors able to provide weekend meals to students?

Yes. Weekend meals are allowable in the SFSP and meal distribution of up to 7 days' worth of meals is allowable as well.

5. Are sponsors able to serve all kids or only students within their school district?

Any child 18 years and younger may receive a free meal at an open SFSP site regardless of the school district they are enrolled in.

6. Can meals be served on non-school days?

Yes. Meals served under the SFSP can be provided on non-school days, including weekends. If the sponsor chooses to operate the NSLP/SBP, then meals may only be served on instructional days.

7. Can up to 7 breakfasts and 7 lunches per child be sent home?

Yes, the sponsor may send home multiple meals because of the non-congregate and meal time waivers in place. Sponsors can only claim up to two meals per child per day. Up to 7 breakfasts and 7 lunches could be sent home per child for the week. Weekend meals are allowable in the SFSP. The sponsor will want to make extra efforts to ensure a good HACCP plan is in place and food is labeled properly with dates to be consumed or disposed of and food safety rules are adhered to.

8. If students are in school for half of the day and then go home for the afternoon, can a grab and go lunch be sent home with the student?

Yes, the non-congregate meal flexibility allows students to be given a meal to eat off site.

9. Are there restrictions on the length of meal service?

The meal service time restrictions waiver allows sponsors to set meal service times that work best for their school and community needs.

10. If a sponsor serves meals under the SFSP, are they required to provide meals to all enrolled students, including students doing remote learning?

If a sponsor implements the flexibilities included in the non-congregate waiver, they must make meals available to all children. These flexibilities include meal service models such as, grab and go, parent pick-up, home

delivery, etc. If the school is providing meals in-person and is not utilizing the non-congregate waiver flexibilities, the school could operate as a closed-enrolled site and serve meals only to students receiving in-person learning.

11. Can students with a sack lunch purchase milk?

Yes. Selling milk à la carte during a meal service is permitted in the SFSP. Sponsors may also choose to cover the cost of milk for these students using the general fund.

12. Can a school building operate the Summer Food Service Program for remote learning and the National School Lunch Program for in-person learning?

Yes. Based on guidance issued in the [USDA Q&A](#) released on Sept. 11, 2020, state agencies may approve SFAs to operate different child nutrition programs based on the needs of each school. The SFSP was extended through December 31, 2020.

13. Are longer lunch periods allowed to accommodate social distancing in the cafeteria and/or classrooms?

Yes, flexibilities are in place for the school year to expand meal service times as needed to accommodate social distancing. School Nutrition recommends working with your superintendent, principals, teachers and local health department to determine what is needed to accommodate social distancing. The Center for Disease Control (CDC) published [Considerations for Schools](#) and [Interim Guidance for School Administrators](#) and the [School Nutrition Association \(SNA\)](#) has also published best practices to consider when planning for meal service.

14. If schools extend time for lunch, does that need to be indicated in official bell schedules or can schools just wiggle room as it's available?

Colorado state law establishes interconnected requirements concerning school calendars, instructional hours, student attendance and school finance. Bell schedules and calendars are used to determine the total amount of instructional time in order to meet these requirements. As such, it is important that bell schedules accurately reflect the actual instructional hours provided to students. Lunch is not part of the instructional day (1CCR 301-39-2.06(2)(a)), therefore adjustments to the lunch period may impact compliance with the instructional hour requirements. In some cases, it is necessary for schools to adjust calendars and/or bell schedules throughout the year. When changes are made, districts and schools should ensure that they remain in compliance with the requirements. CDE's [School District Calendar Guidance](#) is a helpful resource to consider.

15. For sponsors operating NSLP: will Offer versus Serve be required at the high school level if meals are served in the classroom?

Offer versus Serve (OVS) at the high school level is waived for the 2020-21 school year under the Nationwide Waiver to allow [OVS Flexibility for Senior High Schools in the National School Lunch Program](#).

16. For sponsors operating NSLP: is Offer versus Serve signage required to be in each classroom if meals are served in the classroom?

Signage identifying a reimbursable meal is not required for meals in the classroom or where posting the signage is determined to be problematic. Best practice is to have signage available to help both students and school administrators (such as teachers) determine what a reimbursable meal is.

17. For sponsors operating NSLP: if schools are planning to have both in-person and remote learning, can sponsors serve meals to remote students?

Sponsors may serve reimbursable meals to students completing remote learning. Schools will need to meet school breakfast and lunch regulations, such as the meal patterns and ensuring meals are claimed based on the student's eligibility (free, reduced, paid). For remote students, flexibilities such as grab and go options, parent pick-up, multiple meal distribution will be good options to consider.

18. For sponsors operating NSLP: can districts operating a 4-day school week offer and claim meals on the 5th day?

If the 5th day is not an instructional day, the sponsor may not provide meals under NSLP or SBP. This would also not be considered an unanticipated school closure, as the calendar was planned this way. Therefore, the school may not serve and claim or send meals home for students for this 5th day under NSLP or SBP.

19. For sponsors operating NSLP: can meals be offered and claimed for students on a day the school building is closed for cleaning?

Schools may choose to close during the week for cleaning; for example, in-person learning occurs Monday, Tuesday, Thursday and Friday and the building is closed on Wednesday for cleaning. Meals can be served or sent home and claimed for students if instruction takes place on the day the school building is closed. It will be helpful to talk with your district about what constitutes remote instructional hours; for example, coursework or assignments completed at home, online learning, etc. Meals cannot be served and claimed for students if instruction is not provided on the day the school building is closed.

20. For sponsors operating NSLP: can up to 5 breakfasts and 5 lunches per student be sent home if a district typically operates a 4-day school week but plans to have instructional time occurring on the 5th day?

Yes, since the 5th day is an instructional day, the sponsor may send home multiple meals because of the non-congregate and meal time waivers in place. Schools can only claim one breakfast and one lunch per child per school day. Up to 5 breakfasts and 5 lunches could be sent home per child for the week. Weekend meals are not allowable in the NSLP or SBP. The sponsor will want to make extra efforts to ensure a good HACCP plan is in place and food is labeled properly with dates to be consumed or disposed of and food safety rules are adhered to.

21. For sponsors operating NSLP: if students are in school certain days per week, can multiple meals be sent home for the days they are remote?

Yes, multiple meals can be sent home because of the non-congregate and meal time waivers in place. Schools can only claim one breakfast and one lunch per child per school day. Up to 5 breakfasts and 5 lunches could be sent home per child for the week. Weekend meals are not allowable in the NSLP or SBP. The sponsor will want to make extra efforts to ensure a good HACCP plan is in place and food is labeled properly with dates to be consumed or disposed of and food safety rules are adhered to.

22. For sponsors operating NSLP: How can sponsors comply with the Breakfast After the Bell Nutrition Program when students receive a breakfast at a site they are not enrolled in?

The Breakfast After the Bell Nutrition Program requires sites mandated to participate in the program to provide a free meal to all students enrolled at that school site. If a student is enrolled at a school site required to

participate in the Breakfast After the Bell Nutrition Program, that student must receive a free meal wherever they are allowed to receive a breakfast. Sponsors must also ensure that the student is categorized and claimed in their correct eligibility category.

Food Safety

1. What food safety guidelines should sponsors follow for back to school?

Your [local public health agency](#) (LPHA) is the ultimate authority on food safety related questions. It is important to contact the LPHA first since they are best connected to the current COVID-19 situation in their areas. It will be school district and, in some cases, building centric when establishing a plan for providing meals to students. Sponsors should work on appropriate guidelines for individual schools in their districts and run their plan by their LPHA for review and feedback.

For state-level guidance, consult the [Colorado Department of Public Health and Environment](#) (CDPHE). CDPHE offers helpful health safety resources including: [employee health screening form](#), [guidance for wearing masks](#), and [cleaning guidance including specific recommendations for schools](#).

For nationwide recommendations, the Centers for Disease Control and Prevention (CDC) published [What School Nutrition Professionals and Volunteers at Schools Need to Know about COVID-19](#) and [FAQ for School Administrators on Reopening Schools](#).

2. Should sponsors develop a staffing plan in case there is a COVID-19 outbreak among food service staff?

It is recommended that sponsors develop a staffing plan in case employees contract COVID-19. Wisconsin Department of Public Instruction published [Interim COVID-19 Cafeterias and Food Service Guidance](#) that includes guidance on creating a back-up staffing plan. Back-up staffing plan considerations include identifying staff that are part of a high-risk group, providing cross-training and identifying back-ups, breaking up staff in teams to limit exposure, etc. [School Nutrition Association \(SNA\)](#) has also published staffing considerations such as whether staffers are working parents who may not be available to work if children are doing remote learning and determining how many staff members will be needed depending on type of meal service.

3. What should sponsors do if their staff contracts COVID-19 and they are unable to prepare meals but their SFA is still operating?

Sponsors must notify their [local public health agency](#) (LPHA) once they are aware that a staff member has contracted COVID-19. Public health staff are trained in how to manage health information in order to protect privacy and will provide instructions on next steps to take. Sponsors should also follow the district's policy outlining what to do if a school staff member contracts COVID-19. If the school district needs guidance on what to include in their plan for COVID-19 cases and outbreaks, consult the following resources from Colorado Department of Public Health and Environment and Colorado Department of Education: [Cases and outbreaks in child care and schools](#), [School Decision Tree for COVID-19 Cases](#), and [Guidance Regardless of Phase](#).

To the maximum extent possible, sponsors should develop a back-up plan for providing meals to students if they are short staffed. The back-up plan could include contracting with a nearby SFA or [registered meal vendor](#) to see if they could provide meals in an emergency. Procurement without a competitive process may be used for an



emergency, and the sponsor can contract directly with another SFA or registered meal vendor to provide meals. Other considerations include training substitute staff to help prepare meals when short staffed; planning simple menus of packaged shelf stable items that can be easily assembled in an emergency; and purchasing these items.

Professional Standards

1. Will all School Food Authority staff have to meet the training hour requirements for school year 2020-21?

School Nutrition allows the sponsor flexibility to complete annual training requirements over a two-year period. Staff must complete the annual civil rights training and any other training applicable to their day to day job duties.

USDA Foods

1. If a sponsor operates the SFSP this fall, can they still order and utilize their USDA Foods/entitlement?

Yes. USDA Foods may be used in the NSLP/SBP, SSO, or SFSP. Sponsors must document food used and inventory for the SFSP.

Reviews

1. Will CDE School Nutrition conduct school meal Administrative Reviews (ARs) in the 2020-21 school year?

School Nutrition will not conduct school meal ARs or Procurement reviews in the 2020-21 school year. [Sponsors](#) originally scheduled for an AR in the 2020-21 school year will be rescheduled over the next three years to fit in to the approved five-year cycle. A new review schedule is forthcoming.

2. Why are sponsors receiving a Summer Food Service Program review in the 2020-21 school year?

School Nutrition is required to conduct a review of sponsors operating the SFSP, including sponsors that operated the program during unanticipated school closures last spring and any new sponsor that operates the SFSP this fall. All sponsors that did not have a school meal administrative review in school year 2019-20 and did not operate SFSP in the previous year, are required to undergo a review. The SFSP review schedule will be updated soon. Review resources can be found on [CDE School Nutrition website](#).

3. For sponsors operating SFSP: does CDE have guidance on completing monitoring visits offsite?

With the nationwide waiver allowing required monitoring visits to be completed offsite, sponsors must complete the form to the best of their ability through a desk audit. Sponsors could choose to call a site staff member who is onsite and have them answer the questions via telephone, or the site staff could provide the sponsor pictures of site operations as documentation, for example. Sponsors would also be able to review completed daily meal count forms for accuracy.

4. For sponsors operating NSLP: are sponsors required to complete on-site monitoring?

Per the nationwide waiver, sponsors operating NSLP and SBP are not required to conduct on-site monitoring; however, sponsors are encouraged, to the greatest extent practical, to still monitor program operations off site. Sponsors could choose to call a site staff member who is onsite and have them answer the questions via telephone, or the site staff could provide the sponsor pictures of site operations as documentation, for example.

Financial Management

1. Can sponsors provide a 'program-adult meal' to the teachers or adults serving meals in the classrooms?

This is allowable. Meals served to employees directly involved in the operation and administration of the breakfast and lunch programs (e.g., managers, cooks, servers, etc.), may be provided a meal at no charge. This is considered a fringe benefit attributable to program costs. It is at the discretion of the local sponsor to charge food service employees for their meal; the cost of these employee meals may be paid from program funds.

2. How should sponsors track program costs and income for the SFSP?

Sponsors must be able to account for the receipt, obligation, and expenditure of all SFSP funds. Sponsors must ensure that all SFSP reimbursements are being used solely for conducting non-profit food service operations. The SFSP [Financial Tracking tool](#) can be used to track program costs and income.

3. Can sponsors serve à la carte items during SFSP meal service?

Yes. The sale of à la carte items during a meal service is permitted. However, the non-program and program components of the food service operation must be tracked separately, accounting for the receipt, obligation, and expenditure of all SFSP funds. The sponsor must maintain accounting records documenting proper cost allocation between the program and non-program components of its food service operation.

4. If sponsors began charging students for meals while operating NSLP at the beginning of the school year, can they credit accounts?

Sponsors that switch to SFSP and choose to retroactively claim meals served under NSLP for August and September must reimburse or credit families that paid for meal during that time.

5. What grant code should be used for CARES Act funding?

CDE received CARES Act funds intended for meal reimbursement for March – September.

Grant code – 4555

Source code – 4000

CFDA # - 10.555

SRE code – 94 (optional), can be used to isolate activity during March - June

CARES Act funds should be used to claim all meals March-September under the appropriate program:

Unanticipated School Closures under SFSP (Emergency Feeding) - March - June

SFSP – July - August

NSLP and SBP – August – September

Starting with the month of October 2020, sponsors need to revert back to normal coding for meal reimbursement revenue.

- If you are a public school district operating the Summer Food Service Program, your meal reimbursement needs to be coded as Grant Code 4559 starting with the month of October 2020.
- For additional detailed [coding](#) and financial management information, visit the [back to school planning webpage](#).

School Meal Eligibility

1. Do stimulus payments or the weekly unemployed insurance payments count as income when determining eligibility for free or reduced-price meals?

COVID related stimulus payments *do not* count as income when determining free or reduced-price meal eligibility.

However, the weekly COVID related unemployment insurance or regular unemployment payments *do count* as income when determining eligibility for free or reduced-price school meals. In general, any regularly received monies should be counted as income unless stated otherwise in the [Eligibility Manual](#).

2. If sponsors are implementing 100% remote learning and serving meals through SFSP, do free and reduced-price applications still need to be provided?

Yes. Because Colorado determines at-risk and other state district funding based on the annual October Count of free, reduced-price, and paid enrolled students, collecting and processing applications is still allowable. Uploading enrollment files into the Direct Certification module (and the extension of that eligibility) is also allowable. The payroll funding of these efforts, while implementing SFSP, must come from general funding and not the non-profit food service account (Fund 21).

3. Is Verification required for the 2020-2021 school year?

Yes. Sponsors that collected free and reduced-price meal applications must select a sample of approved applications, as of October 1, 2020, to verify the validity of the information provided on the application. This is applicable to all sponsors that collected applications no matter the program being operated (National School Lunch Program or Summer Food Service Program). USDA memo SP 04-2021 states verification is still necessary and required. All verification activities must be completed by Feb. 28, 2021. Standard verification processes and requirements will remain the same as in previous years.

4. Are sponsors required to use applications approved as of October 1, 2020 to determine their verification sample size for SY2020-2021?

Yes. Although USDA extended the verification due date to Feb. 28, 2021 the sample size used to conduct verification activities must be based on the number of approved applications on file as of October 1, 2020. Sponsors that collected free and reduced-price meal applications are required to conduct verification. Sponsors that *did not* collect free and reduced-price meal applications are not required to conduct verification.

5. Do Direct Certification requirements apply to sponsors that are implementing SFSP?

Yes. Sponsors are still required to meet the upload deadlines for the 2020-2021 school year. At a minimum, sponsors should be uploading monthly.



6. For sponsors operating NSLP: what is considered the start of carryover for students receiving remote learning or a hybrid model? Does day 1 start when students are in-person or is day 1 on the first day of “instruction time”?

Day 1 for the 30 days of carryover will begin the first day the student is receiving “instruction”, whether that be in-person or remote. Each student must receive 30 operating/instructional school days of their prior year eligibility carrying over into the new school year, or they have reapplied, whichever comes first.

7. For sponsors operating NSLP: many sponsors are providing options for 100% remote learning, even if in-person instruction is available. These students may still be enrolled in a site participating in NSLP, but receiving remote learning from a different education agency that may not be participating in NSLP. In this instance, can the district/school still distribute and accept completed applications for [free and reduced-price school meals](#)? Or should they distribute the [Family Economic Data Survey \(FEDS Form\)](#)?

If a student is enrolled in a school site that participates in NSLP, the free and reduced-price school meal application must be offered and sponsors must accept and process complete applications. This will apply for students receiving remote learning from a non-participating site, but are still enrolled in a participating NSLP site. The FEDS forms must be offered for students enrolled in a site that does not participate in NSLP.

8. For sponsors operating NSLP: If sponsors are implementing 100% remote learning, do free and reduced-price applications still need to be provided?

Yes. Sites that participate in NSLP must offer the free and reduced-price school meal application. There currently there are no flexibilities in distributing, collecting and processing free and reduced-price meal applications. Sponsors can implement innovative ways to collect applications (see [Letter to Household template](#) for ideas) and ensure application submission methods are clearly communicated to households.

Sponsors should plan for all operating scenarios to ensure families can access and submit free and reduced-price meal applications.

9. For sponsors operating SFSP: May free and reduced-price meal applications be collected and processed?

Sponsors operating SFSP for the entire 2020-2021 school year may continue to collect and process free and reduced-price meal applications to maintain POS systems and also to establish eligibility for other benefits, specifically Pandemic-EBT (P-EBT). Sponsors must provide new students, such as kindergarteners, and newly eligible children an opportunity to establish their eligibility, specifically for P-EBT.