

Frequently Asked Questions COVID-19 School Nutrition Guidance

This document will serve as a guidance resource for School Food Authorities (SFAs) wanting to serve school meals during school closures related to COVID-19.

Updated 6/8/2020

1. **Is there a way to feed kids if my district closes due to the COVID-19 virus?**

Yes. SFAs can apply to operate Area Eligible feeding sites using the Seamless Summer Option (SSO) in the Tennessee Meals Accounting and Claiming (TMAC) system.

2. **What type of feeding site can be operated?**

All feeding sites should be open sites.

3. **Who can I feed?**

Open sites can feed all children age 18 and under and those children over age 18 with a disability may receive meals, as defined by the Tennessee State Board of Education in chapter 0520-01-09. The child must be present to receive a meal at community and school sites. However, the child does not have to be present for home meal delivery methods as long as the school has obtained the household's written consent to deliver meals and has verified the current address. For more information, please [click here](#).

Under the Families First Coronavirus Response Act, USDA has issued a nationwide flexibility that allows parents or guardians to pick up meals without children present to further limit exposure to the novel coronavirus. This may only be implemented if an SFA is operating under the non-congregate waiver. If the SFA chooses to implement the flexibility, a plan must be implemented to maintain accountability and program integrity, including maintain the one type of meal per child per day requirement. If implemented, SFAs should record who is picking up meals, date, and the types and number of meals served.

4. **Where can I have a feeding site?**

Feeding sites can be located at a school or in the community. All the regular SSO Area Eligibility requirements must be met. This means sites must be a) located in the attendance area of a school that has 50% free-reduced eligibility; or b) at an address that is Census area eligible.

However, the USDA has approved the state agency's request to waive area eligibility requirements on a case by case basis. If you would like to serve meals at a non-area eligible site, please submit the "[Area Eligibility Flexibility Form](#)" to Sandy Dawes at Sandy.Dawes@tn.gov for approval. Work with your regional consultant and state agency staff for specific information regarding your situation. This flexibility is in effect until June 30, 2020, or until the public health emergency has expired, whichever comes first.

5. **Do meals have to be consumed on site?**

No. The congregate requirement which states food must be consumed on-site has been waived for school closures related to COVID-19, meaning students can leave once they receive a meal.

6. **How many meals can I serve?**

Only one meal type per child per day can be claimed for reimbursement. You will need to estimate the anticipated number of meals each site will serve on the SSO Site Application.

The state agency is **allowing a flexibility** at this time **to provide multiple meals of the same type per child at one time**. This would allow for up to a week's worth of breakfast, for example, to be provided at a single delivery service. It would be considered a best practice to serve no more than 3 meals at a time per meal type in order to help maintain accurate counts and to help any food storage barriers children may face. All state and local food safety requirements must be met during this type of delivery option.

7. **What meal counting resources are available?**

An example meal counting sheet titled "Meal Counting Forms for Provisional Schools" is available on the Tennessee Department of Education School Nutrition Program website at <https://www.tn.gov/content/tn/education/snp-resources/snp-meal-counting.html>.

8. **Are meal counts required for each day or each child for each day?**

Meal counts are required per day. For example, if you provide 3 breakfasts to a child at the breakfast meal service time to cover 3 days, you would count 3 breakfast meals for the day of service.

9. **What combination of meals can I serve?**

Only two meal types can be served at a site during a single day. A site cannot serve both lunch and supper. Possible meal combinations are:

- a. Breakfast and lunch
- b. Breakfast and snack
- c. Breakfast and supper
- d. Lunch and snack

10. **What are serving time requirements?**

During school closures due to COVID-19 the state agency has implemented a blanket waiver to absolve the meal time requirements. Therefore, breakfast and lunch may be served simultaneously in order to help reduce social interaction. Therefore, when you submit your site level application with the specified meal service times, the application will serve as your request and approval all in once for waived meal service time requirements. This varies from previous guidance as this not allowable during usual circumstances.

11. **What are meal pattern requirements?**

All meal pattern requirements must be met. Since many meals will be served as grab and go without implementing offer versus serve, all daily minimum serving amounts are required. This includes a variety of milk.

All meal pattern requirements are still required. However, if SFAs are experiencing difficulties with food distribution and supply chain issues arise, the USDA has provided nationwide approval for states to locally waive specific meal pattern requirements to support access to nutritious meals. To apply for this waiver, submit the ["COVID-19 Meal Pattern Flexibility Form"](#) to Sandy Dawes,

Sandy.Dawes@tn.gov, and cc the school nutrition program regional consultant. All submissions will be reviewed on a case by case basis.

12. Can I purchase food/supplies off-bid to have what is needed to serve emergency meals on short notice?

Yes, micro and/or small purchasing procedures can be utilized to purchase items that may be needed to implement emergency feeding.

13. Can I implement mobile feeding?

Yes, however the site at which the children are fed must be area eligible and all other regulations apply. If you are utilizing a bus route to feed children, it is suggested that bus stops are consolidated vs door to door delivery service since each meal service site must be reported. Door to door delivery may be implemented once written consent from each eligible household is obtained. In addition, schools should confirm the household's current contact information and the number of eligible children in the household to ensure the correct number of meals are delivered to the correct location. For additional information regarding how to submit sites in TMAC contact your regional consultant.

14. Who is eligible to receive home delivered meals under SSO?

Schools operating an open SFSP or SSO site in an area eligible location may deliver meals to all children in their eligible area. Schools operating a closed-enrolled site may enroll children who are certified as eligible for free or reduced price meals, and deliver meals only to the enrolled, eligible children. It is the responsibility of the school to confirm the eligibility of each participating child. All children attending Provision 2, Provision 3, or Community Eligibility Provision (CEP) schools are considered eligible for delivered meals. Be sure to follow [appropriate guidance](#) for initiating home meal delivery.

15. What are monitoring requirements?

Each SFA implementing SSO during a closure for COVID-19 is required to monitor one site, at least one time. Monitoring can be documented with the "SFA Monitoring Form" located at this address: <https://www.tn.gov/education/snp-resources/snp-programs.html>. This monitoring will not replace monitoring requirements under SSO during summer months.

16. Can I feed kids during spring break?

Yes, in the case of school closures due to COVID-19, FNS can allow SSO sponsors to claim federal reimbursement for meals served during scheduled spring breaks that were cancelled or postponed due to the unforeseen public health emergency. This varies from previous guidance as this not allowable during usual circumstances.

17. Can I serve meals to adults?

Meals served to adults cannot be claimed for reimbursement. Adults can purchase meals as they would meals during regular breakfast and lunch service.

18. Will there be special reporting required associated with utilizing the COVID-19 and Unanticipated School Closure waivers?

Yes. Meals served under a waiver require additional reporting to USDA, therefore the claim for reimbursement is neither sufficient nor timely enough to provide the level of detail needed for required reports. The state agency is required to submit daily reports to FNS detailing the number of schools using the waivers and the number of meals served under the waivers for each meal type. Therefore, each SFA utilizing waivers (feeding at schools during unanticipated closures or in a non-

congregate manner) will be required to submit that information daily to the state director via email. **The state director will communicate with the SFA deadlines for submitting this information on a daily basis.** Meals served from community (non-school) sites do not require the additional data reporting and thus the claim for reimbursement will suffice.

19. **What is my first step to feeding kids if our district shuts down due to COVID-19?**

If your district would like to utilize the waiver and operate SSO during closures due to COVID-19, please follow these steps:

- Email the following information to Sandy Dawes, State Director of School Nutrition at Sandy.Dawes@tn.gov. CC Randa Meade at Randa.Meade@tn.gov and your regional consultant on the email. **See an example/template email at the end of this document. Feel free to copy and paste the template into your email and input relevant information for your district.**
 - All sites you plan on providing meals;
 - Type(s) of meal Programs that will be served (NSLP, SBP, Snack, Supper);
 - Number of students you anticipate serving;
 - What meal distribution method(s) you will be using for school closures due to COVID-19;
 - Methods you will use to ensure proper operation of the program including meal content, meal counts, food safety, oversight, etc.; and
 - Methods of communication with families.
- Complete a SSO application in TMAC for each site you want to operate:
 - Reach out to your regional consultant.
 - Work with Randa Meade, Office Number (615)-532-0372, or email Randa.Meade@tn.gov.

20. **Do I need my SSO application to be approved to begin serving meals?**

The SSO application **does not** have to be approved prior to meal service for meals to be claimed for reimbursement in emergency situations. As long as the site is area eligible, anticipate the site being approved for meals to be claimed for reimbursement.

21. **Can I operate both SSO and Summer Food Service Program (SFSP)?**

Yes. However, you must operate only one program per site. For example, you could operate SFSP at 10 sites within your district and operate SSO at 5 sites within your district. Also, if you choose to operate SSO at this time due to COVID-19 closures, you may still operate SFSP during the summer months.

22. **Can I provide ready to eat (RTE) foods, such as pre-cooked chicken nuggets, in meals?**

Foods that are labeled as fully cooked at the processing plant may be included in meals without heating prior to service. The package **must** state the item has been **“fully cooked”** before it can be provided, and safe heating and handling instructions **must** be included along with the provided food. For more information refer to the [2009 Food Code](#) and the [Tennessee Department of Health Food Safety Fact Sheets](#).

23. **Can I operate the Fresh Fruit and Vegetable Program (FFVP) during the public health emergency?**

Yes, school districts that are currently FFVP participants may operate the program for those FFVP sites that are currently operating emergency feeding. For specific questions please reach out to MarLea Finch at MarLea.Finch@tn.gov.

24. **Coronavirus Aid, Relief, Economic Security (CARES) Act Information:**

- a. The state agency received funds for the Child Nutrition Fiscal Year 2020 from USDA. The funds are to be used for paying NSLP, SBP, Special Milk, CACFP, and SFSP claims for

reimbursement, starting with March 2020 claims and going forward through September 2020. **These expenses will only be utilized in order to pay reimbursements through the school nutrition programs related to COVID-19.**

- b. Education CARES Act allocations per district can be found [here](#). The district must complete an application for consideration.
25. **What documentation must an SFA have during an Administrative Review if they are unable to obtain a food safety inspection during the COVID-19 emergency?** Updated 6/8/2020
If an SFA is unable to obtain a food safety inspection because the State or local health department has suspended inspections due to the COVID-19 emergency, an SFA would need documentation (e.g., a letter) from the health department that these inspections have been suspended. If the SFA was unable to obtain a food safety inspection because the SFA is closed, the SFA would just need to show that the SFA was closed and therefore unable to obtain the food safety inspection. Both of these circumstances would be outside of the control of the SFA and therefore would not be held against them during an administrative review.
26. **Is the purchase of personal protective equipment or other supplies that are intended to prevent or reduce the spread of COVID-19 an allowable cost?** Updated 6/8/2020
Yes. Personal protective equipment (e.g., gloves and face masks) as well as cleaning and sanitary supplies are allowable costs during the current public health emergency, provided that such purchases are made in support of Child Nutrition Program operations. All purchases must continue to meet the required criteria of being reasonable, allocable, and necessary (refer to 2 CFR 200.404 and 200.405). State agencies are reminded that State Administrative Expense (SAE) funds may not be used for local level purchases of protective equipment, cleaning, or other sanitary supplies.
27. **May funds from the nonprofit food service account be used to cover meal delivery costs and/or the purchase of supplies to facilitate non-congregate meal service during the public health emergency?** Updated 6/8/2020
Yes. Expenses related to meal delivery and/or provision of meals in non-congregate settings are allowable costs. However, State and local agencies should note that additional reimbursement is not available for these purposes. Further, all such purchases must continue to meet the required criteria of being reasonable, allocable, and necessary (refer to 2 CFR 200.404 and 200.405). For further information, please refer to COVID-19 Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meal Delivery Using Existing Authority, and SP 14-2020, CACFP 08-2020, SFSP 07-2020, Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3.
28. **May funds from the nonprofit food service account be used to purchase bottled water (as an alternative to water fountains and other on-site options) for non-congregate meals served during the public health emergency?** Updated 6/8/2020
Yes. The purchase of potable bottled water to supplement meals served in non-congregate settings is an allowable cost. For further information, please refer to policy memorandums SP 28- 2011, Water Availability During NSLP Meal Service, CACFP 20-2016 Water Availability in the Child and Adult Care Food Program, and SP 49-2016, CACFP 18-2016, Resources for Making Potable Water Available in Schools and Child Care Facilities. State and local agencies are reminded that milk is expected to be served as part of each reimbursable meal and potable water may not be provided as a substitute for milk.

Template Email

SFAs may utilize this email template to notify the school nutrition state director of SSO operation during unanticipated school closure due to COVID-19.

- Email Sandy Dawes and cc Randa Meade and your regional consultant.

Email body template:

Hello Sandy,

- Sites you plan on providing meals;
 - ABC Middle School, ABC County High School
- Type(s) of meal Programs that will be served (NSLP, SBP, Snack, Supper);
 - NSLP, SBP
- Number of students you anticipate serving;
 - We anticipate serving between 150-200 students each day
- What meal distribution method(s) you will be using for school closures due to COVID-19;
 - Meals will be served at both ABC Middle School and ABC County High School. Students will enter the cafeteria, take their sack lunch, and leave the site to consume the meal offsite.
- Methods you will use to ensure proper operation of the program including meal content, meal counts, food safety, oversight, etc.;;
 - We will use our field trip menu options in order to stay in the meal pattern. We will utilize the state-provided "Meal Counting Forms for Provisional Schools" to record and consolidate meal counts. Since we will be preparing the food in our kitchens, the trained staff will continue to implement our HACCP plan as per the usual operation. We will utilize the state-provided "SFA Monitoring Form" to monitor one site at least one time.
- Methods of communication with families.
 - We will use social media and district-wide phone tree to notify families of the availability of meals.