

**Child Nutrition Programs
Seamless Summer Option (SSO) and Summer Food Service Program (SFSP)
Operating Non-congregate Meal Waiver During Unanticipated School Closure Due to COVID-19**

**Pennsylvania Department of Education
Division of Food and Nutrition**

Questions and Answers

1. Can we serve breakfast and lunch together at the same time?

Yes. Take a meal count for breakfast and lunch separately. Ensure the PEARS Site Application for each site approved for SSO or SFSP meal service indicates breakfast and lunch is being served.

2. Can we serve multiple days of meals together at the same time?

Yes. Up to five days' worth of meals may be bundled. Take a meal count for each meal type (i.e., breakfast, lunch, etc.) by day. Ensure the PEARS Site Application for each site approved for SSO or SFSP meal service indicates the days for which meals are being supplied. For example, if a school is providing five days' worth of meals over the course of two days (meals provided on Monday for Monday, Tuesday and Wednesday and Thursday meals are provided for Thursday and Friday), the site application must indicate the days for which those meals are provided (in this example Monday – Friday). Proper food safety protocols must be considered. Providing families with refrigeration and reheating instructions is advisable. A Food Safety Tip Sheet for Grab and Go Meals is available on PEARS Download Forms, COVID-19 Section.

3. Can parents pick up meals for children that are not present?

At this time, USDA has not provided guidance that allows for meals to be provided to children that are not present for meal pick up. We are expecting this guidance in near future. Schools should document any meals served that cannot be claimed for reimbursement (see question 14).

4. If my school was approved as an open area eligible site and I am serving all students in the district for free, can I use bus stop routes to make meal pick up more convenient for families?

Yes. "Mini/remote-sites" are allowable to serve the area of eligibility. It is not necessary for PDE to approve this if a currently approved site can be used to serve these meals. While this is not required, it would be beneficial for schools to indicate in the comment section on the PEARS Site Application that meals are being dropped off or delivered.

5. If I am serving meals under SSO, do I need to analyze my menus?

The National School Lunch Program (NSLP) meal pattern is the meal pattern to be used for SSO. Schools may pick one age-grade group. Schools are not expected to do a nutrient analysis at this time as the focus should be on feeding the children. Schools should do their best to ensure all meal components are provided. However, PDE recognizes that it may not be possible to serve all subgroups in a grab and go meal.

6. Is school food service considered essential staff or a life sustaining service?

Yes.

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7. Can meals be delivered to students?

The USDA Question and Answer Guidance, released on March 11, 2020, allows for the delivery of meals. The Guidance is technical but boils down to a few important points.

Meal service sites which were approved as closed sites, that are only serving free and reduced eligible students, must ensure they receive parent/guardian consent to share the free/reduced eligibility information with those involved in meal delivery. The school must also obtain permission for the delivery of meals, have the head of household's name, and address needed for meal delivery. This can be accomplished using a sign-up sheet (online or paper) that includes explicit permission to share free/reduced eligibility information. Confidentiality of free/reduced eligibility information remains critical.

Meal service sites which were approved as open sites, who provide meal service in an area eligible location and serve all children in the community for free, may deliver meals in the area of eligibility but must obtain parental/guardian consent to deliver meals, including the number of children in the household, and the household's address for meal delivery. Although not delivery, bus stop routes can be used to establish "mini/remote-sites" in the area of eligibility and parental consent is not required. If adding bus or delivery routes, we recommend schools base this out of a currently approved site so that a new waiver is not required. Adding a comment to the PEARS Site Application (i.e., bus routes, delivery, etc.) is encouraged.

In the case of meal delivery, students do not need to be present as there is an "agreement" (consent) to deliver meals to a specific address in the district and confirmation of number of children receiving meals in that household.

8. When does the PEARS Site Application need to be submitted?

For SFSP, the PEARS Sponsor Application and Site Information should be submitted as soon as possible. *Instructions for Completing the SFSP PEARS Application Packet* is available on PEARS Download Forms, Training Section. For SSO, the PEARS Site Application is to be submitted and approved by March 30, 2020. The obvious priority at this time is meal service; however, claims cannot be submitted until the PEARS Site Application is approved. *Instructions for Completing the SSO Site Application in PEARS* is available on PEARS Download Forms, COVID-19 section.

9. Must schools meet the monitoring requirements?

USDA has not waived the monitoring requirements at this time. However, the priority is meal service and schools should do the best they can to provide oversight. PDE is awaiting additional information from USDA on this topic.

10. How will schools be reimbursed for meals served through SSO and SFSP?

The reimbursement schedule will continue as posted on PEARS Download Forms. Reimbursement for SSO follows NSLP and School Breakfast Program (SBP) reimbursement rates and are available on PEARS under the Claims tab and then selecting Claims Rates. Reimbursement for SFSP follows the SFSP reimbursement rates and are available on PEARS, SFSP Claim section then selecting Claims Rates.

Once the PEARS Sponsor Application and Site Information is approved, schools will have access to the SFSP or SSO claim. The SSO claim is a separate link on the NSLP and SBP claim and will appear after the Sponsor Application and Site Information are approved. Schools will submit their March NSLP and SBP as usual claiming meals up until the time of the COVID-19 mandatory school closure. Meals served

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during school closures, under PDE SSO Waiver approval for non-congregate meals, will be submitted under the SSO claim.

An SSO Claim Quick Tip Sheet is available on PEARS Download Forms, Claims for Reimbursement Section.

SFSP is a standalone claim under the SFSP section on PEARS. Schools will submit their March NSLP and SBP as usual claiming meals up until the time of the COVID-19 mandatory school closure. Meals served during school closures, under PDE SFSP Waiver approval for non-congregate meals, will be submitted under the SFSP claim.

All meals served through SFSP and SSO will be claimed in the free category and reimbursed at the free rate.

11. What documentation is required prior to submitting an SSO or SFSP claim for reimbursement?

Before the magnitude of this pandemic was realized, PDE communicated that meal count documentation would need to be provided prior to submitting a claim for reimbursement. PDE is rescinding that requirement. Point of Service (POS) documentation for meals served and claimed must be maintained; however, it does not need to be submitted to PDE prior to submitting a claim for reimbursement. PDE will request documentation on an as-needed basis.

12. What ages can be served through the SSO or SFSP?

A site that has been approved as an area eligible open site may feed any child, 18 and under, from the community regardless of what school the child attends. This includes the Pre-K, Head Start, community and school associated childcare, as well as children from neighboring public and private schools, etc. All meals are claimed for reimbursement in the free category.

13. Will schools be reimbursed for the out of ordinary expenses being incurred as a result of serving non-congregate meals?

Schools should maintain documentation of all costs that are not ordinarily incurred through NSLP, SBP, SSO, or SFSP meal service, such as costs associated with transportation, staffing, protective gear, meals that cannot be claimed for reimbursement, etc. Schools are also encouraged to track volunteer time in the event that it could be beneficial documentation.

14. With the extended closure of schools, do schools need to revise their waivers?

No, a new waiver does not need to be submitted to extend the days meals will be served. However, PEARS Site Applications must be kept up to date with changes to operating days, meal types, and/or number of days meals will be served.

If adding bus or delivery routes, we recommend schools base this out of a currently approved site, and a new waiver is not required. Adding a comment to the Site Application (i.e., bus routes, delivery, etc.) is encouraged. However, if adding new sites, a new waiver does need to be submitted to determine if the site is an open or closed enrolled site.