

# Child Nutrition Program Operations During School Year 21-22

## 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 2021-22 school year. Unless otherwise noted, the guidance applies to both the National School Lunch Program (NSLP) and Seamless Summer Option (SSO). Recent updates are highlighted in yellow.

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## Child Nutrition Program Waivers and Implementation

### 1. What waivers are currently in place for school year 2021-22 for the Seamless Summer Option (SSO) and National School Lunch Program (NSLP)?

On April 20, the USDA released a series of [nationwide waivers](#) that allow flexibility to school meal programs for the 2021-22 school year. School Nutrition has opted into all waivers for the state of Colorado. On June 11, the USDA also released this [Q&A](#) on child nutrition program operations for the 2021-22 school year.

- School Food Authorities (SFAs) have the option to participate in the National School Lunch Program (NSLP) or the Seamless Summer Option (SSO) in school year 2021-22.
- SFAs that opt to participate in SSO can provide free meals to all students at any school site. Meals served under the SSO will be reimbursed at the higher Summer Food Service Program (SFSP) [rate](#) established for rural or self-prep sites, regardless of location. SFSP reimbursement rates are adjusted annually for inflationary changes and become effective January 1 of each year. Therefore, rates paid for SSO meals will change in January 2022.
- SFAs that opt to participate in the NSLP and School Breakfast Program (SBP) will charge students for meals based on student eligibility. Meals served under the NSLP or SBP will be reimbursed at the applicable NSLP and SBP rates.
- The non-congregate, meal service times, and parent pick-up waivers allow schools to utilize meal distribution methods that work best for their students such as, home delivery, grab and go, curbside pick-up, multiple meal distribution, bulk meals, and parent-pick up.
- Sponsors that are unable to meet the meal pattern can request a meal pattern waiver. CDE School Nutrition will provide more information on how to request a waiver soon.
- All schools, regardless of their location, can provide and claim all afterschool snacks at the free rate.
- Monitoring can be conducted offsite.
- Offer versus serve is not required for high school students.
- **Fresh Fruit and Vegetable Program Waivers:**
  - The 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 2021-2022.

## Child Nutrition Program Options During School Year 2021-22

### 1. Are sponsors required to participate in the Seamless Summer Option?

No. Sponsors have the option to participate in the National School Lunch and School Breakfast Program or the Seamless Summer Option for school year 2021-22.

### 2. Are sponsors required to participate in the Summer Food Service Program (SFSP) during summer 2021 in order to participate in the Seamless Summer Option (SSO) during school year 2021-22?

No. Sponsors are not required to participate in the SFSP during the summer months in order to operate the SSO in school year 2021-22.



**3. Are Residential Child Care Institutions eligible to participate in the Seamless Summer Option?**

Yes. All School Food Authorities (SFAs), including Residential Child Care Institutions, can operate the Seamless Summer Option.

**4. Where can sponsors learn more about the Seamless Summer Option requirements?**

Seamless Summer Option (SSO) requirements can be found on the [USDA webpage](#). This [comparison chart](#) clarifies how the SSO differs from the Summer Food Service Program and the National School Lunch Program.

**5. What is the difference between the National School Lunch Program and the Seamless Summer Option?**

The Seamless Summer Option (SSO) is a component of the National School Lunch Program (NSLP) and combines features of the NSLP, School Breakfast Program and the Summer Food Service Program. Under the SSO, sponsors will follow the NSLP and SBP meal pattern requirements and are able to provide free meals to all students and claim the meals at the free rate. For school year 2021-22, all meals served under the SSO will be reimbursed at the SFSP rate.

**6. Can sponsors operate the Afterschool Snack Program at sites serving meals under the Seamless Summer Option?**

Yes. The Afterschool Snack Program can operate at sites providing meals under the Seamless Summer Option. In addition, based on the Area Eligibility for Afterschool Programs nationwide waiver, all schools, regardless of their location, can provide and claim all afterschool snacks at the free rate.

**7. Can sponsors operate the Fresh Fruit and Vegetable Program at the same time as the Seamless Summer Option?**

Yes. The Fresh Fruit and Vegetable Program can operate at sites providing meals under the Seamless Summer Option during school year 2021-22. CDE School Nutrition will be submitting additional waivers for USDA approval to allow parent pick up and alternate site pick up. Additional guidance will be coming soon.

**8. Can Fresh Fruit and Vegetable Program items be served and consumed during other meal services?**

Yes, FFVP can be served and consumed during other meal services.

**9. Can the Fresh Fruit and Vegetable Program be served outside of a regular school day?**

Yes, FFVP may be served at a time the approved site(s) determines to be appropriate.

**10. Can sponsors operate the Child and Adult Care Food Program At-Risk Afterschool Meals Program at the same time as the Seamless Summer Option during school year 2021-22?**

Yes. The CACFP At-Risk Afterschool Meals Program can operate at sites providing meals under the Seamless Summer Option.

## Applications

### Seamless Summer Option (SSO)

#### 1. How do sponsors apply to participate in the Seamless Summer Option for school year 2021-22?

Sponsors will apply through the Child Nutrition Portal and complete the Seamless Summer Option application. School Nutrition will provide additional guidance on how to apply by the end of June.

### National School Lunch Program (NSLP)

#### 1. How do sponsors apply to participate in the National School Lunch and School Breakfast Programs for school year 2021-22?

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](#). More information on when the application will be open is forthcoming.

## Meal Site Eligibility

#### 1. What types of meal sites can be operated under the Seamless Summer Option?

Sponsors participating in the Seamless Summer Option (SSO) have flexibility to serve meals at school and non-school sites. However, USDA Food and Nutrition Services encourages sponsors to operate the SSO at school sites when possible. As schools transition back to in-person learning, sponsors may choose to offer meals only at their school sites.

#### 2. Do sites need to meet the eligibility requirements to participate in the Seamless Summer Option?

Based on the Nationwide Waiver to Allow the Seamless Summer Option (SSO) through School Year 2021-2022, SFAs that opt to participate in the SSO can provide free meals to all students at any school site, regardless of the site's location. Sites do not need to meet the traditional 50% eligibility threshold to participate in the SSO during the 2021-22 school year.

## Menu Planning

#### 1. What meal patterns must be followed for the Seamless Summer Option?

Sponsors operating the Seamless Summer Option (SSO) must follow the NSLP and SBP meal pattern requirements. In addition, SSO sites must provide meal accommodations consistent with the requirements to accommodate children with disabilities in the school meal programs. More information on meal patterns and menu planning can be found on the School Nutrition Unit's [menu planning webpage](#). More information on special dietary needs can be found on the School Nutrition Unit's [special dietary needs webpage](#).

#### 2. Is there a specific age/grade group that should be used for menu planning?

Sponsors should plan menus to meet the NSLP and SBP age/grade group requirements based on the student grades at each site. The meal patterns were designed to meet the food and nutritional needs of the average student in each age/grade group. Sponsors may request an [age/grade group waiver](#) when necessary, such as

when alternative meal service options or social distancing is needed to ensure safety. CDE School Nutrition will approve requests based on specific and justified needs to support access to nutritious meals.

**3. What age/grade group should be used for meals served in bulk or for grab and go meals?**

Sponsors may request a [meal pattern waiver](#) for the age/grade group requirements to support bulk meals or grab and go service. When planning bulk or grab and go menus, sponsors should consider which age/grade group may best meet participants' needs. For example, sponsors may plan to distribute grab and go meals that meet the age/grade group requirements for the majority of students picking up meals at that location.

**4. Under the Seamless Summer Option, what meal pattern should be used for pre-K students?**

USDA has updated the [nationwide meal pattern waiver](#) to allow pre-K students in to be included in age/grade group waiver requests. Meal pattern waiver requests are in place to provide flexibility while experiencing continued challenges related to COVID-19.

Pre-K students who eat meals separately from older students, such as in the classroom, must follow the [pre-K meal pattern](#) without an approved age/grade group waiver in place.

**5. Will plated meals be required to contain full servings of all components, including meeting vegetable subgroup requirements?**

Yes, meals that are plated or pre-plated for students must meet all component and quantity requirements for the applicable meal pattern and grade group. Sponsors may choose to plate certain components while allowing students the ability to select the additional components needed to make a reimbursable meal. If sponsors choose to partially plate meals for students, the plated components must meet quantity requirements.

**6. What Healthy, Hungry-Free Kids Act requirements are in place for school year 2021-22? Specifically, which sodium tier is in place and what percentage of grains must be whole grain-rich?**

Due to the vacated 2018 Final Rule, Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements, the meal pattern requirements have returned to the 2012 final rule. This means that flavored milk may only be fat-free, all grains served must be whole grain-rich, and meals must meet Target 2 weekly sodium levels. This applies to sponsors operating NSLP and SBP or SSO as both follow the NSLP and SBP meal patterns. Sponsors who anticipate hardships in meeting these requirements may apply for a meal pattern waiver this school year.

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

Yes. Sponsors that are unable to meet the NSLP or SBP meal pattern can apply for a meal pattern exemption. CDE School Nutrition will approve requests based on specific and justified needs to support access to nutritious meals while ensuring safe meal service.

**8. What types of meal pattern waiver requests will be approved?**

USDA is allowing meal pattern flexibilities for the following:

- Sodium requirements
- Whole grain-rich requirements



- Vegetable subgroup requirements
- Milk variety requirements
- Low-fat flavored milk
- Age/grade group requirements

Waiver requests for the flexibilities listed above will be approved based on justification from the sponsor.

USDA has directed CDE School Nutrition to approve sodium flexibility waiver requests for all sponsors who apply for the 2021-22 school year. Sponsors who complete the Sodium Waiver Request will be granted flexibility to serve meals that meet the Target 1 sodium requirements for the 2021-22 school year.

Sponsors may apply for flexibilities using the [Meal Pattern Waiver Request form](#). Sponsors experiencing supply chain and procurement challenges beyond the allowable meal pattern waivers may contact Erin Opgenorth at [opgenorth\\_e@cde.state.co.us](mailto:opgenorth_e@cde.state.co.us) or 720-822-1883 or Kerri Link at [link\\_k@cde.state.co.us](mailto:link_k@cde.state.co.us); 720-660-5499.

#### **9. What are best practices for menu planning for the 2021-22 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](#).

#### **10. Are sponsors required to make water available to all students during meals?**

Yes. The requirement to make water available during meals has not been waived for NSLP/SBP or SSO. Water must be available to all students, free of charge, and without restriction during both breakfast (when served in the cafeteria) and lunch. Check with your local health department for strategies to safely make water available for students during meals. During the COVID-19 pandemic, when lunch is served in the classroom, the potable water requirement does not apply. The potable water requirement also does not apply to meals served outside of the school (i.e., provided via delivery or grab and go service).

#### **11. Does the low-fat flavored milk meal pattern flexibility extend to a la carte items?**

No, the flexibilities around low-fat flavored milk do not apply to the [Smart Snacks](#) regulations. Milk sold on the school campus during the school day may be fat-free flavored or unflavored or low-fat unflavored.

## Civil Rights/Special Dietary Needs

### 1. 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](#).

### 2. 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](#).

### 3. Where should sponsors display “And Justice for All” posters?

The “And Justice for All” poster must be prominently displayed in all locations where meals or other program services are distributed. A poster is not required to be displayed in every classroom when meals are served in classrooms. Posters must be displayed when meals are being served from stationary vehicles but are not required for vehicles making door-to-door deliveries.

Due to COVID-19, if printed posters are not available for display, [paper copies](#) or the 2015 edition of the “And Justice for All” poster may be displayed as necessary.

## 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 Seamless Summer Option (SSO), all reimbursable meals served are free. Meals served under the SSO will be reimbursed at the higher Summer Food Service Program (SFSP) [rate](#) established for rural or self-prep sites, regardless of location. 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. Sponsors may operate an open site that serves all children, regardless of school enrollment.

**3. How do sponsors accurately record and claim meals under the Seamless Summer Option?**

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 Seamless Summer Option claim requirements?**

Sponsors may use an electronic point of service system for the Seamless Summer Option but must ensure that students are not charged for a meal and count and claim all student meals at the free rate.

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

Teachers may complete the [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, one 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.

**8. 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.

**9. 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.

**10. For sponsors operating NLSLP: 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.

**11. Are second meals reimbursable at SSO sites?**

Based on [the USDA policy memo SP09-2017](#), all Seamless Summer Option sites must plan for and prepare one meal per child during meal service. However, USDA Food and Nutrition Service allows SSO sites to offer children a second breakfast and claim it for reimbursement in accordance with requirements in 7 CFR 220.9(a). SSO sites may not claim second lunches or snacks for reimbursement under the SSO (see 7 CFR 210.10(a)(2)).

**12. Can sponsors serve meals prior to their NSLP or SSO application being approved?**

Yes. Sponsors must serve meals in accordance with their NSLP or SSO application. Due to state agency approval timelines, reimbursable meals can be served and claimed prior to renewal application approval. All documentation and meal counting and claim requirements still apply.

## Meal Service

**1. What meals can be served under the Seamless Summer Option?**

Sponsors may serve up to two meals a day at open and closed-enrolled sites. Allowable meal types include: breakfast, AM snack, lunch, PM snack, and supper (this does not include snacks served under ASP). For example, a sponsor may serve breakfast and lunch under SSO and a snack under ASP. Sponsors may choose which combination of meals they would like to serve; however, serving lunch and supper to the same children on the same day is not allowed.

**2. Can sponsors implement the meal service flexibilities for the duration of the 2021-22 school year?**

As outlined in the [USDA Q&A](#), sponsors should use the meal service flexibility waivers only for the duration and extent that they are needed. For example, when all students at a school can safely return to the school cafeteria for breakfast and lunch, the school would no longer need the non-congregate meal service waiver. In other cases, schools may be able to return to an in-person meal service but need flexibility for certain students who continue with remote learning.

**3. 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.

**4. Can sponsors delivery meals to children's homes?**

Yes. The Nationwide Waiver to allow Non-congregate Feeding in the Child Nutrition Programs allows for home delivery of meals.

**5. Can multiple meals be served at one time and in bulk?**

Yes. Sponsors are able to determine what meal service model works best to meet the needs of their community.

**6. Is Offer versus Serve allowable under the Seamless Summer Option?**

Yes, offer versus serve is allowable and sponsors have the option to implement this menu planning method. Sponsors are not required to implement offer versus serve, including high school, based on the offer versus serve nationwide waiver.

**7. Are sponsors able to provide meals to students that are 100% remote?**

Yes. Sponsors are able to provide meals to students completing remote learning.

**8. Are schools with a 4-day school week allowed to offer meals on the fifth day?**

If school instruction is occurring on the fifth day, meals may be claimed. If school instruction is not occurring, then meals may not be claimed under the Seamless Summer Option or the National School Lunch Program.

**9. Are sponsors able to provide weekend or holiday meals to students?**

No. Sponsors (not including Residential Child Care Institutions) may not provide weekend or holiday meals through the Seamless Summer Option (SSO) or the National School Lunch or Breakfast Programs when school is in session during the regular school year in 2021-22. Weekend or holiday meals may be provided through the Child and Adult Care Food Program (CACFP) At-Risk Afterschool Meals Program. USDA encourages schools to consider participating in CACFP At-Risk Afterschool Meals during the 2021-22 school year.

Up to 1 meal and 1 snack can be provided through the CACFP At-Risk Afterschool Meal Program after the school day ends or during holidays, school breaks, or weekends. 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).

During unanticipated school closures, weekend meals can be provided under the SSO. For more information on unanticipated school closures, visit the emergency feeding [webpage](#).

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

Sponsors may operate an open site that serves all children, regardless of school enrollment.

**11. 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.

**12. 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.

**13. Can students with a sack lunch purchase milk?**

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

**14. 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.

**15. 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.

**16. Is Offer versus Serve 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 2021-22 school year under the Nationwide Waiver to allow OVS Flexibility for Senior High Schools.

**17. 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.

## 18. 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. [View](#) Breakfast After the Bell Nutrition Program sites mandated to participate in school year 2021-22 if operating NSLP.

## 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 [Guidance for What School Nutrition Professionals and Volunteers at Schools Need to Know about COVID-19](#), [Strategies for Protecting K-12 School Staff from COVID-19](#) (school nutrition staff section), [Safely Distributing School Meals During COVID-19](#), and [Guidance for Operating Child Care Programs during COVID-19](#).

### 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. How can SFAs safely operate salad bars or other self-service stations?

First check in with your [local public health agency](#) (LPHA) to ensure self-service stations are safe to operate in your county. If they are allowed follow the following recommendations from the [CDC](#): require students and staff to wear masks when using self-service stations; provide handwashing stations or hand sanitizer to use before the self-service station; encourage students and staff to remain at 6 feet apart while waiting in line through physical guidance and visual cues; replace shared objects such as tongs according to food safety code; provide a sneeze guard to protect food from contamination; and properly handle used or dirty non-disposable food service items.



#### 4. Do the food safety inspection requirements apply to sponsors operating SSO in school year 2021-22?

Yes. The standard food safety inspection requirements apply in school year 2021-22. The requirement under 7 CFR 210.13(b) is for schools to obtain annually two food safety inspections each school year, regardless of the meal program provided. More information on food safety inspections including a request for health inspection letter can be found on the [CDE Food Safety webpage](#).

## Professional Standards

#### 1. Will all School Food Authority staff have to meet the training hour requirements for school year 2021-22?

Based on the [USDA Q&A, professional standards training requirements](#) are not applicable to sponsors that operate SSO during school year 2021-22. While training is not required for SSO sponsors, school nutrition professionals are encouraged to complete any training specific to their day-to-day job duties. Sponsors operating the National School Lunch Program must meet professional standards training requirements. School Nutrition allows the sponsor flexibility to complete annual training requirements over a two-year period. Regardless of which child nutrition program is being operated this school year, all staff must complete the [annual civil rights training](#).

## School Wellness Policy

#### 1. What are the Local School Wellness Policy Requirements under SSO for school year 2021-22?

Sponsors should continue to implement the goals and standards included in their local wellness policy and comply with all requirements of the final rule. USDA extended the deadline to complete the triennial assessment to June 30, 2022 under a [nationwide waiver](#). View the [wellness policies](#) webpage for additional resources.

## Reviews

#### 1. Will CDE School Nutrition conduct school meal Administrative Reviews (ARs) in the 2021-22 school year?

Yes. CDE School Nutrition will maintain the planned review schedule. This school year, administrative reviews will take place virtually and School Nutrition staff will not observe meal service on site. Reviews will continue to assess compliance with program operations including current waivers and flexibilities in place for the Seamless Summer Option and/or National School Lunch and School Breakfast Programs.

The review schedule for this school year along with the five-year review and technical assistance cycle can be found on the administrative review webpage. For questions, contact your School Nutrition point person, who is also your reviewer.

#### 2. What are the sponsor monitoring requirements for the Seamless Summer Option?

Sponsors are required to review each site operating the Seamless Summer Option at least once during its operation. The sponsor must review the site's compliance with meal counting, claiming, menu planning, and food safety requirements. It is recommended that sponsors use this [monitoring form](#).

#### 3. Are sponsors required to complete monitoring on-site?

No. The nationwide waiver of onsite monitoring allows sponsors to conduct monitoring offsite through desk reviews and/or phone calls with site staff. The [monitoring form](#) must still be completed.

## Financial Management

### 1. How do sponsors determine adult meal pricing under the Seamless Summer Option?

Per 7 CFR 210.14(f), the adult meal price must cover the cost of adult meals and ensure that Federal reimbursements are not subsidizing these meals. USDA's recommendation for SY21-22, "therefore, the current cost of adult meals, particularly in light of rising/uncertain food costs in SY 21-22 may not be adequately priced for this school year's food service operation. In the absence of food cost data to set adult prices, the USDA is encouraging SFAs to establish the adult meal price using the higher SFSP reimbursement rates being received while operating the SSO in SY 21-22. This will ensure that the adult meal price will cover the SFA's cost of producing the adult meal." USDA's recommendation for SY21-22 under SSO operations; Adult Breakfast \$2.46 - \$2.50 and Adult Lunch \$4.58 - \$4.60 - *These prices are a **recommendation** for this year only.*

*\*At a minimum, you should be charging adult meals the free reimbursement rate for SBP/NSLP plus USDA Foods entitlement per meal, (Adult Breakfast \$2.00 and Adult Lunch \$4.00).*

### 2. Are sponsors required to complete the USDA Paid Lunch Equity (PLE) Tool?

Sponsors operating the Seamless Summer Option during the 2021-22 school year do not need to follow PLE requirements per the USDA nationwide waiver #97. **Sponsors operating the National School Lunch Program are required to complete the USDA PLE Tool.** More information about PLE can be found on the financial management [webpage](#).

### 3. May sponsors operating the Seamless Summer Option during the 2021-22 school year and earning SFSP reimbursement rates also receive additional reimbursement amounts tied to NSLP/SBP operations, including the NSLP 7 cents performance-based reimbursement and 2 cents differential, and SBP severe need payments?

No. These additional payments are specifically tied to the receipt of NSLP/SBP base reimbursement rates and may not be paid to SFAs receiving the higher SFSP reimbursements during school year 2021-22.

### 4. What grant code should be used for the Seamless Summer Option?

The School Nutrition Grant Chart has been updated to include Seamless Summer Option, Emergency Operational Cost Reimbursement, and Local Purchasing Program. [Please find the link to the chart here.](#)

### 5. Do sponsors need to complete a Nonprogram Revenue Tool (NPR) for SY 2021-2022?

The Nonprogram Revenue (NPR) Tool must be completed annually. NPR Tools are only collected for those sponsors undergoing an Administrative Review in SY21-22. For more information, please visit the [Nonprogram Revenue page](#).

## School Meal Eligibility

### 1. Do Direct Certification requirements apply to sponsors that are implementing Seamless Summer Option?

Yes. Sponsors are still required to meet the upload deadlines for the 2021-2022 school year. At a minimum, sponsors should be uploading monthly.

### 2. Sponsors operating the Seamless Summer Option: May free and reduced-price meal applications be collected and processed to assess eligibility for P-EBT?



- Sponsors operating the SSO may continue to collect and process free and reduced-price meal applications to establish eligibility for Pandemic-EBT (P-EBT) only. Sponsors must make applications available as needed to certify students for free and reduced-price meals, specifically for purposes of P-EBT. Paper copies of the free and reduced-price application must be made available at the district office.
- Sponsors operating SSO but not participating in P-EBT cannot collect free and reduced-price applications. Sponsors may use the [Family Economic Data Survey](#) (FEDS Form) for data collection; however, food service funds (Fund 21) cannot be used in the processing of FEDS Forms.
- All [disclosure requirements](#) for release of student eligibility for non-P-EBT or non-program needs will apply.
- To support outreach to families, CDE, in partnership with LunchAssist, has created a flyer and sample social media posts highlighting the importance of providing household income for this school year for purposes of P-EBT. Outreach materials can be found on the [back to school guidance webpage](#).

**3. Sponsors operating the National School Lunch Program: May free and reduced-price meal applications be collected and processed to assess eligibility for P-EBT?**

Sponsors operating the National School Lunch Program may continue to collect and process free and reduced-price meal applications as part of normal operations.

**4. If sponsors operating SSO choose to collect free and reduced-price meal applications, are they required to conduct verification?**

Yes. Based on the [USDA Q&A](#), sponsors that collect household applications in school year 2021-22 are required to conduct verification, regardless of the reason the applications were collected and/or the child nutrition program they are operating. The sample size used to conduct verification activities must be based on the number of approved applications on file as of October 1, 2021.

**5. If sponsors collect applications in May and June for Summer P-EBT, does the eligibility extend to the 2021-22 school year?**

No. Eligibility determinations must be made every school year. Families that apply before July 1, 2021 must complete a new application for the 2021-22 school year.

**6. Sponsors operating the Seamless Summer Option or National School Lunch Program: is it a requirement to publish the public release of eligibility criteria for the 2021-22 school year?**

Yes. Sponsors operating the Seamless Summer Option or the National School Lunch Program must publish a public release regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year. Under SSO, sponsors must notify households that all meals will be offered at no cost. Like past years, CDE School Nutrition will publish a statewide public release in July on behalf of all sponsors stating NSLP and SSO operations. Sponsors may publish their own public release but are not required to. Templates for the public release are available on the [School Meal Eligibility webpage](#).



**7. If sponsors operate SSO, do they need to provide clarifying information for households in the information letter to households, eligibility letters or other application related materials?**

No. Sponsors cannot make changes to the information letter to households, eligibility letters or other application related materials. Instead, sponsors must use a supplemental cover letter that better explains SSO operations and why households should continue to complete the free and reduced-price meal application. Free and reduced-price meal application templates and related materials, including the new cover letter, are available on the [School Meal Eligibility webpage](#).

**8. Can free and reduced-price applications still be used for the annual At-Risk/Free Lunch Count (AKA: “October Count”) in school year 2021-22?**

Yes, but only if the district/site is participating in the P-EBT eligibility data collections and/or operating NSLP. If the district/site is **not** participating in the P-EBT data collections or operating NSLP, free and reduced-price applications cannot be used for purposes of October Count reporting. In this instance, Family Economic Data Survey (FEDS) Forms and direct certification must be used to determine students’ eligibility. [USDA published flexibilities](#) allowing alternate methods of data reporting when current year eligibility cannot be collected for title and state funding purposes. CDE has stated they are not allowing any flexibilities for at-risk, title funding or October Count. Standard application, direct cert list, and FEDS form collection/reporting processes will apply. Beginning in school year 2021-22, At-Risk funding will be based upon free **and** reduced-price lunch eligible student counts. FEDS Forms and the At-Risk Count Audit Resource Guide can be found on the CDE At-Risk/Free Lunch Count [webpage](#).

**9. Do stimulus payments or the Child Tax Credit 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 monthly Child Tax Credit 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](#).