



PROGRAM GUIDANCE

Rhode Island Department of Education
Office of Statewide Efficiencies
Child Nutrition Programs

USDA Waiver Guidance SFSP 2020

Program: SFSP	Date Approved: 5/18/2020	Approved by: Stephen Carey	Date Reviewed/Revised: 5/18/2020 Date Distributed: 5/19/2020
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PURPOSE:

Per local and national guidance, social distancing continues to be necessary to avoid the spread of the novel coronavirus, which means that youth summer programs may not be able to operate under normal circumstances but many families will still need to rely on summer meals in order to provide children and youth with the food that they need. The following guidance is intended to help Sponsors understand current and pending flexibilities that are or may become available in order to plan for the upcoming summer season. This guidance will cover the following topics:

[Approved SFSP Waivers for Summer 2020](#)

- [Non-Congregate Feeding](#)
- [Parent Pick-Up](#)
- [Meal Service Times](#)
- [Offer vs. Serve \(OVS\)](#)
- [Meal Pattern Flexibilities](#)
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- [Area Eligibility](#)
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[General Requirements for Non-Congregate Feeding in the SFSP](#)

- [Logistics of Drive-Thru Grab n' Go Non-Congregate Feeding](#)
- [Logistics of Walk Up Grab n' Go Non-Congregate Feeding](#)
- [Logistics of Home Delivery](#)
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Approved SFSP Waivers for Summer 2020

Waiver Subject: Non-Congregate Feeding

USDA Reference: COVID 19: Child Nutrition Response #22

Effective Date: through August 31, 2020

This waiver allows for all meals served to be taken off-site for later consumption. This waiver also provides Sponsors with the flexibility to offer multiple days worth of meals at one service and/or to provide delivery of meals, provided that all other program requirements are being met. Use of this waiver will require Sponsors to submit a detailed plan by site indicating how meal service will be managed with special consideration for food safety measures that will be put in place. See "[General Requirements for Non-Congregate Feeding in the SFSP](#)" for more information.

Waiver Subject: Parent Pick-Up

USDA Reference: COVID 19: Child Nutrition Response #25

Effective Date: through August 31, 2020

This waiver allows for parent or guardians to pick up non-congregate meals on behalf of eligible participants. Use of this waiver will require Sponsors to submit a detailed plan outlining how Program accountability and integrity will be maintained, including the measures that will be put into place to ensure that meals are served only to parents or guardians of eligible children (children and youth 18 years old and under) and that duplicate meals are not distributed. See "[Logistics of Parent Pick-Up](#)" for more information.

Waiver Subject: Meal Service Times

USDA Reference: COVID 19: Child Nutrition Response #17

Effective Date: through September 30, 2020

This waiver eliminates the requirements surrounding the minimum amount of time that must elapse between meal services as well as the maximum duration of meal service. Sponsors must continue to establish meal service times, which must be approved by RIDE, however, implementation of this waiver will allow Sponsors to conduct a non-congregate breakfast and lunch (or other approved meal combination) within the same service window.

Waiver Subject: Offer vs. Serve (OVS)

USDA Reference: COVID 19: Child Nutrition Response #16

Effective Date: through September 30, 2020

This waiver allows all SFA Sponsors to implement a meal service using the "OVS" style of service and also allows SFA Sponsors to follow the SFSP meal pattern as opposed to the NSLP meal pattern when implementing this style of service. Use of this waiver will require Sponsors to submit a detailed plan on how meal service will be managed to ensure that all participants are offered and served the required

components. See the USDA handout on SFSP OVS requirements [here](#) for more information.

Waiver Subject: Meal Pattern Flexibilities

USDA Reference: COVID 19: Child Nutrition Response #24

Effective Date: through June 30, 2020

This waiver allows Sponsors to claim meals for reimbursement that do not meet SFSP meal pattern requirements. Sponsors must receive approval from RIDE prior to implementing this waiver and must justify need based on supply chain disruptions related to COVID-19. Extensions of this waiver into the summer months may be forthcoming but will likely happen on a month-by-month basis going forward.

Waiver Subject: Area Eligibility for Closed Sites

USDA Reference: COVID 19: Child Nutrition Response #14

Effective Date: through September 30, 2020

This waiver allows closed/enrolled SFSP sites to establish Program eligibility based on area eligibility data rather than through the collection of meal benefit applications. This represents no change to program operations from previous years but Sponsors electing to use this waiver must indicate so in their SFSP Management Plan.

Waiver Subject: Monitoring

USDA Reference: COVID 19: Child Nutrition Response #15

Effective Date: through September 30, 2020

This waiver eliminates the requirement of Sponsors to visit their SFSP sites within the first week of operation. Note that the requirement to conduct a full site visit within the first four weeks of operation is still in effect for both traditional SFSP Sponsors as well as unanticipated school closure Sponsors. Site visits conducted prior to June 30, 2020 may be done via 'desk audit' with no on-site presence, however, Sponsors continuing to operate after June 30, 2020 will also be required to conduct one full on-site monitoring visit within the first four weeks of operation after July 1, 2020.

Pending SFSP Waivers for Summer 2020

Waiver Subject: Area Eligibility Extension

If granted, this waiver will allow RIDE to approve SFSP meal service sites that do not meet traditional SFSP area eligibility criteria. As of the date of this guidance, RIDE's current area eligibility waiver expires on June 30, 2020. Any site that is currently operating under this waiver will not be eligible for continued reimbursement under the SFSP past June 30, 2020. RIDE will keep Sponsors updated as we receive additional information on the status of this waiver request.

Waiver Subject: Meals per Child per Day

If granted, this waiver will allow Sponsors to serve and claim more than the current allowable two meals per child per day under the SFSP. RIDE understands that many SFA Sponsors are currently providing meals under both the SFSP and the CACFP at-risk afterschool meals programs, which allows Sponsors to provide in total up to 3 meals and 1 snack per child per day, however, CACFP at-risk meal service is only eligible for reimbursement until the last day of the school year. This waiver would allow Sponsors to continue to meet the needs of their communities by providing additional meals under the SFSP in place of the CACFP meals that can no longer be served. As of the date of this guidance, all Sponsors providing meals under the CACFP at-risk afterschool meals program must stop service on or before the last day of school.

General Requirements for Non-Congregate Feeding in the SFSP

All non-congregate meal service plans must be approved by RIDE prior to implementation in order to be eligible for reimbursement. Point of service meal counts must be taken at the time of pick-up. Additional considerations:

- The Sponsor may distribute multiple meals at one time. All Sponsors utilizing the non-congregate feeding option may distribute one full day worth of meals at a time (one breakfast and either one lunch or one supper). If the Sponsor would like to distribute multiple days' worth of meals at one time, they must let RIDE know what their plan is to ensure that the number of meals will be limited to the number allowed (i.e., 5 breakfasts and 5 lunches per child per 5-day period). Please be reminded when submitting your claim for reimbursement that meals should be claimed based on the day(s) that they are intended to be consumed, regardless of the date on which they were actually served/delivered.
- The Sponsor must ensure food safety concerns are addressed by labeling perishable items with an expiration date and refrigeration instructions. If multiple meals are provided at one time, they should be made up of non-perishable items, or packed with ice or an ice substitute.
- Follow the [SFSP Meal Pattern](#).
- Sponsors must follow the Rhode Island Food Code and any additional requirements implemented by the Rhode Island Department of Health to limit the spread of disease.
- If collecting money for adult meals, implement cash management procedures for proper handling of the money, as well as avoiding handling of food and money by the same person without washing or disinfecting hands or using clean gloves.
- The USDA "And Justice For All" non-discrimination poster must be posted at distribution points. Additional posters may be requested from RIDE. Lack of a poster should not prevent sponsors from operating a site.
- All other requirements for the SFSP will remain in effect. Please review the [Administration Guide for the Summer Food Service Program](#) and the [Comparison of Programs SFSP/NSLP/Seamless Option](#) for more information.

Logistics of Drive-Thru Grab n' Go Non-Congregate Feeding

For many Rhode Island SFSP Sponsors, setting up the grab n' go meal pick up as a drive through pick up site may make the most sense. Here are some tips for setting this up successfully:

- Carefully choose the location of the pickup site to accommodate vehicles and ensure social distancing. Bus drop off areas are often the best location on the school campus.
- Set up the site so that recipients can take the meals without leaving their vehicles.
- Include clear signage that directs vehicles where to go and tells recipients what to expect.
- Operate the site at set hours, as approved in CNP connect.
- Do not have recipients sign in with a shared pen. Instead, have a staff member sign people in if names need to be collected (closed-enrolled site) or numbers of children need to be counted (area eligible site).
- Provide workers who will be handing meals to recipients with Personal Protective Equipment (PPE) and training on how to avoid exposing themselves or others.
- Local fire departments or other groups may be available to help with directing traffic or staffing distribution sites.

Logistics of Walk Up Grab n' Go Non-Congregate Feeding

For some Rhode Island Sponsors, it may make more sense to have children pick up meals at a walkup location. Here are some tips for setting this up successfully:

- Carefully choose the distribution location. This may be in a building cafeteria, lobby, or even outside. Avoid locations that will be difficult to find or require people to wait close together in enclosed spaces.
- Post clear signage, including where to park, where to pick up the meals, and any special social distancing measures that you are asking people to take.
- Set up the site to require as little personal interaction as possible, maximize space between staff and recipients (aim for at least 6'), and reduce the number of items that multiple people will touch.
- If it is not possible to keep a 6' distance between staff and recipients, provide staff who will be handing meals to recipients with Personal Protective Equipment (PPE), if available, and training on how to avoid exposing themselves or others.
- Try to have family groups in line keep 6' buffer from each other. Tape lines on floor to show 6' distance.
- Make sure alcohol-based hand sanitizer is available for customers to use, especially if there is no soap and water
- Be sure to clean and sanitize any objects or surfaces customers may touch, including restroom surfaces, menus, condiments, etc.
- Regularly [sanitize](#) door handles and other high touch areas.
- Do not have recipients sign in with a shared pen. Instead, have a staff member sign people in if names need to be collected (closed-enrolled site) or numbers of children need to be counted (area eligible site).
- Operate the site at set hours, as described in your site application in CNP Connect.
- Local fire departments or other groups may be available to help with directing traffic or staffing distribution sites.

Logistics of Home Delivery

Sponsors may consider a meal service model that includes home delivery of meals. All home meal delivery plans must be approved by RIDE prior to implementation in order to be eligible for reimbursement. Point of service meal counts must be taken at the time of meal delivery. Additional considerations:

- RIDE approval is required prior to implementing a mobile delivery model. RIDE recommends exploring mobile delivery models that revolve around a specific approved route rather than home delivery models.
- A school could use school bus routes to distribute meals at set bus stops. Bus stop locations must be approved by RIDE to confirm eligibility and meals would be recorded using the SFSP meal count form. Parent pick-up may be used at bus stop locations but must meet the requirements as outlined in the [“Logistics of Parent Pick-Up”](#) section of this guidance.
- For home delivery, delivery could be completed by mail or delivery service, or hand-delivered by school staff, volunteers, community organizations, or others. This option is only available to SFA Sponsors of school sites due to student confidentiality and logistical requirements.
- In order to participate in home delivery, schools must first obtain written consent from households of eligible children (this could include email or other electronic means) that the household wants to receive delivered meals. 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. It is critical that schools protect the confidentiality of students and their households throughout this process. The school must be the entity that makes the first contact about meal delivery with the household of eligible children and must notify the household if contact information will be shared with an external organization, for example, a local non-profit that will provide meal delivery.
- If it is not possible to keep a 6’ distance between delivery personnel and recipients, provide delivery personnel who will be providing meals to recipients with Personal Protective Equipment (PPE), if available and training on how to avoid exposing themselves or others.
- If offering perishable items, use coolers to keep cold foods, cold. Regularly take temperatures to ensure foods are maintained at the correct temperature.
- A child does not have to be physically present at the time of home meal delivery if the school has obtained the household’s written consent to deliver meals and has verified the current address of the student. If the meals are shelf-stable, no one needs be present, as long as the address has been verified.

Logistics of Parent Pick-Up

Sponsors may consider a meal service model that allows parents or guardians to pick up meals on behalf of eligible participants. Eligible participants are those children or youth 18 years old and younger. All parent pick-up plans must be approved by RIDE prior to implementation in order to be eligible for reimbursement. Point of service meal counts must be taken at the time of meal service. Parent pick-up may be utilized at open or closed enrolled sites, but in either case Sponsors must have a plan to ensure that meals are served only to the parents/guardians of eligible participants and that duplicate meals are not served. Strategies may include, but are not limited to:

- Obtaining school rosters to ensure the existence of eligible participants; only parents/guardians with children included on school rosters would be eligible for parent pick-up
- Requiring parents to show student school schedules, report cards, and/or student identification cards at the time of pick-up
- Labeling meals and meal service sites to indicate “Meals are to be consumed by children or youth 18 years old or younger”
- Maintaining a list of students names that can be cross checked after service to check for duplicate meals
- Having parents fill out a ‘parent pick-up’ waiver that is submitted to and verified by the school. Parents can then use the email confirmation from the school as proof of eligibility upon pick-up. For a sample form, click [here](#).

Primary Summer Food Service Program Contacts

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[Part 225 - Summer Food Service Program](#)
[COVID 19 SFSP and SSO Meal Delivery QA](#)
[COVID 19: Child Nutrition Response #1-25](#)