

School Year (SY) 2020-2021 Planning Q & A

Meal Planning

1. Are meal requirements still the same as last year?

Yes, the meal patterns are still the same as SY 2019-2020. Meals must follow the National School Lunch and School Breakfast Program requirements.

2. What about Offer versus Serve (OVS)?

OVS is allowed only with on-site, congregate feeding. OVS is optional for SSY 2020-2021 for breakfast and lunch K-12. A nationwide waiver made OVS optional for high school lunch this year only.

3. Does the OVS waiver for senior high schools only cover NSLP? What about SBP?

OVS is only required for lunch for grades 9-12. For SY 2020-2021, this requirement is waived, thus making OVS optional for breakfast and lunch K-12. OVS is never required at breakfast, it is always optional. USDA approved [Offer Versus Serve](#) waiver.

4. If milk is offered to a family - can the milk be denied?

With Parent Pick-Up/Non-Congregate Feeding, all required meal pattern components must be provided to families, including the milk. OVS is only allowed with congregate meal service.

5. Will there be a waiver for remote learning to have the K-8 menu used for all parent pick up and take-home meals for preK-12?

Yes, under the nationwide Meal Pattern Flexibility waiver, sponsors can apply for the waiver. Sponsors need to request the waiver through [this link](#). The Michigan Department of Education (MDE) will approve these on a case-by-case basis.

6. What type of meal pattern needs to be followed? For example, all 5 vegetable subgroups served in a week.

Currently, you must provide the correct meal pattern for the age/grade group at the school. This would include the vegetable sub-group requirements. The meal pattern requirements can be found at [School Meal Patterns with Flexibilities](#).

A [meal pattern flexibility waiver](#) request could be submitted for take home/parent pick up meals. Sponsors need to request the waiver through [this link](#). MDE will approve these on a case by case basis.

7. Do we need to offer 2 types of milk at breakfast and lunch?

Yes. The National School Lunch and Breakfast Programs do require that 2 types of milk be offered. Milk must be fat free, or 1%. It can be flavored or unflavored. Two options must be offered. However, MDE has applied for a waiver from the USDA on this requirement for the 2020-2021 school year. Milk would still be required to be served, but only 1 flavor or variety could be served. MDE will update when USDA responds to the request.

8. Do you have suggestions for cold menu options available for legumes and starches?

Legumes: Hummus, Bean Salads, Roasted Chickpeas, Baked Beans
Starches: Corn Salad, Sweet Potato, Potato Salad, Green Peas

9. In scenario Stage 4 and 5 when some students are at school and some are at home, does the same meal need to be offered to both in person and online students?

Meals must be offered to virtual students. The meals provided must meet meal pattern requirements. It would **not** have to be the same exact meals as in person students. It is acceptable to have a different menu for meals served for eating at school and meals that are sent home.

10. If we are serving students onsite and online, can we provide meals that they heat up themselves, or do they have to be "ready" upon receiving?

We recommend checking with your local health department regarding distribution of frozen or ready to cook foods.

11. Do we have to make potable water available for meals served outside of the cafeteria?

Yes. However, a waiver has been submitted to USDA on the potable water requirement for non-cafeteria meals. We have not received word back from USDA on it yet. The goal of the MDE waiver is that water would not have to be available for meals served outside of the cafeteria. This would include parent pick-up, non-congregate meals, as well as meals eaten in the classroom. If meals are served in the cafeteria, water could be made available, as a school has done in previous years.

Counting and Claiming

Remember: The counting and claiming system for both traditional claiming schools and Community Eligibility Provision (CEP) schools **must**:

- Prevent overt identification of students free, reduced-price, or paid eligibility.
- Ensure only one breakfast and one lunch, per student, per day is claimed for reimbursement.

- Count meals at the point a student and/or parent/guardian receive the meal.

12. How do you charge for meals that are taken home?

It depends on your current set-up. Clear communication to families is the key. If you have a Point of Service (POS) system, you should continue to use the system to record meals. If possible, use POS at distribution. Sponsors can also elect to use a pre-pay system. Continue using student meal accounts.

13. Are we allowed to be reimbursed if we give kids meals on the bus and/or in the classroom?

Yes, it is allowable to distribute meals in the classroom or on the bus. This should be indicated in your 2021 Child Nutrition Program Application.

14. With the upcoming School Year, if meal distribution takes place: Does the family have to provide ID for each child?

No, with the Parent Pick-Up meal distribution method, parents/guardians will indicate the names of their students verbally. The food service staff will need to confirm meals are for district enrolled students. School districts can develop a local procedure for parent pick up.

15. When will we find out that all children can eat for Free or not? If not, how do we avoid shaming? Example: Have a class of 20 students and 3 students are eating breakfast in the classroom the assumption will be the children are free or reduced.

Currently, all meals must be claimed as free/reduced/paid unless a school is approved for the Community Eligibility Provision (CEP). Whatever meal service model is selected, all meals MUST be offered to all students regardless of benefit status. Sponsors cannot assume that since a student has a free benefit status, that they would automatically like a meal.

16. Will we be able to claim all meals as free, just like we did in the spring under Unanticipated School Closure (USC)?

No, USC ended June 30, 2020. Meals for the 2020-2021 school year will be claimed by benefit status, unless CEP and sponsors must develop a proper point of service procedure. This may be with an electronic POS system or paper roster. We currently do not have an area eligibility waiver to provide all meals for free.

17. How do we do meal counts when eating in the classroom? Some teachers will be great, others will make it very difficult.

Proper POS is required for classroom meals. This can be accomplished with a student roster, point of service system, or with meal cards. If teachers will be responsible for the point of service, they must receive annual training on proper point of service. MDE has resources for classroom training, visit [School Breakfast Program](#).

Sponsors should routinely visit classrooms to monitor for proper POS. Make sure to communicate with building principals and administrators for a successful team approach.

18. How do we handle both in-person meals and at-home meals at the same time?

If you have both students in person and virtual, you will need to develop a procedure to offer meals to both. You can distribute multiple meals at a time to the virtual students. This meal pick-up could be outside of the in-person school schedule (at night, weekend, etc.). You do not have to distribute meals to virtual students at the same scheduled time as the in-person students.

19. Can we send meals home for Monday if students are in school on Monday?

If you have a half-day school schedule for example, you could feed the students breakfast at school and then send home a bagged lunch. Only 5 lunches and 5 breakfasts can be claimed in a week per student for planned school days.

20. We are offering in school as well as virtual instruction. Do we claim the children the same way? How do we go about serving the off-campus students?

Virtual, off-campus students can be served using parent pick-up, non-congregate, and meal-time waivers. For example, you could establish a parent-pick up day and time frame for virtual families to pick up meals for the week. Multiple meals (up to 5 days-worth) can be distributed at one time for planned school days.

Virtual and in person meals should be claimed by benefit status.

21. Are we allowed to send home meals with students instead of feeding them on campus? These would be students that were in person that day?

Yes, with the non-congregate and meal-time waivers, you can elect to send meals home with students this upcoming school year.

CEP

22. If you are not 100% free reimbursement through CEP, how do you cover the costs of operating CEP?

If your school or district has an 88% CEP eligibility, this means that 88% of the total meals will be reimbursed at the free rate and 12% at the paid rate. At the end of the school year, if the entire Food Service Fund ends with a program loss the general fund would have to cover the deficit. Districts who use traditional free/reduced/paid claiming are also expected to make the the Non-profit School Food Service Account (NSFSA) whole if there is a deficit, this policy is not unique to operating CEP.

Federal Reimbursements and any other revenue that are required to flow to the NSFSFA can be used to cover the costs of operating in CEP (i.e., State Supplemental Monies like 31a, 31d, and 31f, Non-program Revenues, Donations, etc.). Your existing Food Service Fund balance can be used as well for all food service operations. If the cumulative FS Fund balance ends in a loss the general fund or other non-federal funds would have to cover the difference. Non-federal funds like the general fund, however, would be required to cover any deficit that remains in the NSFSFA should all the federal reimbursements and other sources of revenue be insufficient to break even in the NSFSFA. More information can be found in the CEP Eligibility Planning and Implementation Guidance, SP 61-2016. Additional information can also be found in USDA Memo SP 54-2016 Community Eligibility Provision: Guidance and Updated Q&As.

The [USDA CEP estimator tool](#) is a good resource for comparing what CEP reimbursement will look like compared to current claiming reimbursement and revenue.

23. How can I find out if my districts are eligible for CEP?

Contact Natalee Mickelson at MickelsonN@michigan.gov for guidance about the possibility of your district participating in CEP.

24. With CEP, do I have to record meals by name instead of the meal count form if doing parent pick up meals?

When counting students who receive a meal using parent pick-up, you will need to record meals by name to ensure only one breakfast and one lunch, per student, per day is claimed for reimbursement, and that the meals are being served to students who are enrolled in your district. If you only distribute meals from a few buildings, you will need to know which school each student attends.

Fiscal

25. Are there resources available to offset the additional cost of disposables?

None that we know of yet.

26. Has there been any indication about the 2020-2021 NSLP Equipment Assistance Grant approvals?

The 2020-2021 NSLP Equipment Assistant Grant (EAG) has been awarded. Sponsors awarded the grant have been notified. We do not expect many (if any changes) for the 2021-2022 EAG which will open in MEGS+ in the spring of 2021.

27. If we feed students in the classrooms, can districts charge cleaning and supervision in the classrooms during feeding to the food service program?

Custodial/cleaning time worked specific to food service may be charged to the Food Service Fund. This can be captured through the recovery of indirect costs, or directly through timesheets that indicate daily hours worked specific to Food Service.

As for the monitoring of the meal service, time worked specific to food service may be charged to the Food Service Fund at food service equivalent wages for the work performed. The documentation burden for direct charges in the Food Service Fund is very high (restricted fund, federal funds, non-profit account, etc.) and timesheets that indicate daily hours worked specific to Food Service or PARS for salaried employees are required. In the absence of specific documentation, this can be captured through the recovery of indirect costs.

In addition, your district will have to ensure these charges (whether charged directly or indirectly) are captured according to the Costs for the Development of the Federal Indirect Cost Rates (Form R0418A). Any School Food Authority (SFA) using an indirect cost rate (ICR) to bill for facilities and administrative costs should review the calculation of those rates to ensure accuracy. The source of the information utilized to determine indirect cost rates is the district's Financial Information Database (FID) report. Therefore, it is essential that districts classify expenditures uniformly and consistently per the Michigan Public School Accounting Manual. Districts are responsible for reviewing the information provided in the R0418A form and submitting adjustments using form DS-4513, if necessary. Form DS-4513 and more information can be found on the MDE Indirect Costs Webpage.

Contracts

28. Can we utilize more than one vendor, i.e., one vendor for in-school meal service and a second vendor for pick up meal service for students who are remote?

Yes, but a rebid would be necessary since two separate contracts would be needed for the two types of meal service.

Social Distancing

29. Our maintenance department does not believe social distancing is required at stage 4 or 5. Can we have more clarity on that?

Michigan's 2020-21 Return to School Roadmap indicates for each phase what is required, strongly recommended, and recommended. The plan can be viewed at [MI Safe Schools: Michigan's 20-21 Return to School Roadmap](#).

30. Can we serve in the café and send students to the classroom to eat?

Yes, this is allowable if this is part of your district plan.

Virtual Learning

Remember: Regardless of learning plan, students must have access to meals.

31. Can we send meals home on Friday for next week for virtual or remote learners?

Yes. You can distribute multiple meals (up to 5-days' worth) at a time.

32. For virtual students, can we provide a scheduled school week at a time (5 days at the most)?

Yes, you can provide meals for multiple days (up to 5) for virtual students. Remember, you cannot claim meals for non-school days (scheduled days off, holidays, breaks). You will need a way to keep track of daily meal counts using a roster or student list or updating your POS system.

33. Will we still be required to provide meals for virtual learners if our district is offering a choice for families?

Yes. The district plan should make it clear to parents how and where they can get access to meals. You could set up an ordering system for virtual learners to offer the meal options to those choosing to learn from home.

34. If you have in school classes and some students E-learning, do we deliver to students not coming to the building?

If you want to deliver, you can, but you are not required to "deliver" meals to the homes of virtual students. However, sponsors should offer meals to virtual students using the parent pick-up meal distribution model. You must have a proper POS procedure for counting meals for either method.

35. Assistance with figuring out the virtual meal service. It is a challenge to feed normally with staffing and we are not sure how to do the meals for virtual with staffing and space.

A possible solution could be weekend or evening meal distribution (parent pick-up) for virtual learners. This may free up staff during the school day to focus on the students in-person. It could also allow some flexibility for staff to work different hours.

MDE Requirements

36. Will MDE impose their own requirements in addition to the Governors Roadmap?

No, we will be following the [MI Safe Schools: Michigan's 2020-21 Return to School Roadmap](#).

37. Do K-12 public schools need to offer meals to students for all school operating days?

Yes. It is the governor's intent that breakfast and lunch should be made available to all students for scheduled school days, no matter the phase. Remember, you cannot claim meals for non-school days (scheduled days off, holidays, breaks).

38. Is there any guidance for parent communication?

This is a local decision. It is best to communicate with parents often about meal service options, cost, service times, procedures, etc.

CACFP

39. If schools sent home a lunch, can we send home the after-school supper with them as well?

No, sending home meals only refers to breakfast and lunch. MDE applied for a waiver for after-school supper but has not received a response yet.

Civil Rights

40. If meals are served in the classroom, does an And Justice for All poster need to be in every classroom?

We are waiting further clarification from USDA.

41. If meals are served in the classroom and a child has a food allergy, how should that be handled without discrimination?

It is important to discuss accommodations with the parent/guardian. Eliminating a food because of a food allergy is a local decision. It is permissible to have the student eat in a 'safe zone' (separate area or room that is allergy free) and invite a friend or two to join them, so it doesn't seem like a punishment.

Scenarios

42. Can we distribute meals on a Saturday that are intended for M-F? It might be difficult to cook for students in school and distribute for those students at home. I might not have the staff to do both. I was considering a Saturday pick up.

Yes.

43. If half the student body reports on Monday and Tuesday for in-person learning and the building is closed on Wednesday for deep cleaning and the other half of the student body reports on Thursday and Friday for in-person learning, would we be required to serve meals on Wednesday?

Are the students assigned online learning for Wednesday? If it is a planned learning day, then meals should be offered.

44. A district is going back to school 100% in class to start the school year. They want to eliminate the chance of congregating groups at

the beginning of school by having the kids go straight to their classrooms. The proposal is to still provide breakfast but not have to do a daily breakfast service, i.e., focus food service efforts on lunch, by sending home 5 breakfasts (unsure if it would be on Friday for the following week or 4 breakfasts on Monday for the following days) in bulk as to have the students eat breakfast before they come to school. Would this be allowed?

This scenario is creative. While we have not seen this one before, it would be allowable with the mealtime and non-congregate waivers this school year. There is no requirement that lunch and breakfast be served/delivered in the same manner.

45. An alternative education high school meets for half day in the morning (7:30 – 11:00 am). Feeds students' breakfast and dismissal is at 11 am. Can lunch meals be sent home with students?

Yes, due to the non-congregate waiver, meals may be sent home with students and consumed off-site.

46. Can we serve pick up meals in one location for all schools in our district? Or do we have to allow pick up at all schools for students that are not in person?

It would be the district's choice on how to meet the needs of families with regards to pick up locations.

47. If you have school of choice kids and we are in phase 4, but those kids do not live in district are we required to get them meals or just have them available to pick up?

Students need to get meals from the district they are enrolled and attend, so the meals are claimed properly.

48. If parents CHOOSE to keep their children at home and we are providing an online school for them, do we have to send meals home to them? This would be if we are in session, but they do not feel comfortable sending their kids back.

The district needs to have a plan on how to make meals available to students. Home delivery is not required.

49. If we are completely online, is the only option for them to come and retrieve breakfast and lunch (potentially for 5-day meals)?

If the school is able, they can deliver meals, but careful tracking of who is getting meals will be required.

50. If we go into Phase 3, do parents have to show ID for each of the meals being picked up?

No, with the Parent Pick-Up meal distribution method, parents/guardians will indicate the names of their students verbally. The food service staff will need to confirm meals are for district enrolled students. School districts can develop a local procedure for parent pick up.

51. If we go into Phase 3, will meals still be claimed under the National School Lunch Program?

Yes

52. How do they suggest we do offer vs. serve for elementary classes served in classrooms?

Offer vs. serve is not required at the elementary level. It is optional for the School Breakfast Program for all age/grade groups and is now optional for all age/grade groups (including 9-12 this year only) for the National School Lunch Program.

53. A district's first two weeks of academic learning will be accomplished 100% virtually. As a result, most of the students/families have *not* expressed an interest to pick up reimbursable breakfasts and lunches during this timeframe. The school wants to know the following: If most of the families do not want to pick up meals during this two-week timeframe, is the district obligated to have meals available? Money is tight, and they are hesitant to order food from their vendor, if the chances are high that it will ultimately wind up in the trash due to low demand.

Yes, they should still have meals available, however, they could collect orders from their families ahead of time to keep track of who would like meals available for virtual learning. They would then order the appropriate number of meals. I would suggest adding a few extra in case someone was unable to order ahead of time. Meals would still be available but there would not be as much worry and cost associated with having too many leftover meals.

54. If we start the school year fully remote and we have childcare services offered by local community partners, can we offer breakfast and lunch to those students through the National School Lunch Program?

Yes, meals could be provided to district enrolled students and you would need to ensure a proper point of service procedure. Meals would be claimed based on the student benefit status (free, reduced, or paid) and would need to be counted, at the point of service, for each location (for example, on a student roster). Included in the procedure should be a process ensuring that these students attending the community program are ineligible to participate in the parent-pick up meal service that is occurring simultaneously.

School Year 2020-2021 Waiver Information

School Year (SY) 2020-2021 Waivers from United States Department of Agriculture (USDA)

On June 26, 2020, USDA announced 5 waiver extensions for Child Nutrition Programs.

Waiver #33: Nationwide Waiver to [Allow Non-congregate Feeding](#) in CNP – Extension #2

- July 1, 2020 to June 30, 2021.
- Program operators may provide non-congregate meals during the pandemic related operations.
- Applies to National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program.
- Meals must be claimed under the correct program. Planned full or partial building closures are not considered unanticipated school closures for SY2020-2021. If it is planned that the students are not in the school building, then the meals are claimed under NSLP and SBP.

Waiver #34: Nationwide waiver to [Allow Meal Service Time Flexibility](#) – Extension #2

- July 1, 2020 to June 30, 2021.
- Program operators may provide multiple meals at one distribution time with no time of day restrictions.
- Program operators may also extend meal service times in the school building to allow for fewer students in the cafeteria because of social distancing.
- Applies to National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program.

Waiver #35: Nationwide Waiver to [Allow Parents and Guardians to Pick Up Meals](#) for Children – Extension #2

- July 1, 2020 to June 30, 2021.
- Program operators may distribute meals to a parent or guardian to take home to children. Program operators must maintain program accountability and integrity. This waiver also applies to adults picking up meals for adults in the adult portion of the Child and Adult Care Food Program.
- Applies to National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program.

Waiver #36: Nationwide Waiver to [Allow Meal Pattern Flexibility](#) – Extension #4

- July 1, 2020 to June 30, 2021
- Allows state agencies to approve meal pattern flexibility that are supported by local operator documentation and pre-approval by the state agency. Program operators must have a plan to support access to nutritious meals while minimizing exposure to the pandemic. Program operators are strongly

encouraged to maintain and meet the nutrition standards for each Program to the greatest extent possible. Flexibility is based on supply chain disruption or for issues with food safety, handling, and logistics.

- Applies to National School Lunch Program, School Breakfast Program and Child, and Adult Care Food Program.
- Sponsors can begin the process to use this waiver by visiting [SY20-21 Meal Pattern Flexibility Waiver Requests](#).

Waiver #37: Nationwide Waiver to [Allow Offer Versus Serve Flexibility](#) for Senior High Schools

- July 1, 2020 to June 30, 2021
- Program operators are not required to implement Offer vs. Serve at the high school level for lunch. Note: There is not a requirement for Offer vs. Serve for breakfast for high schools.
- Applies to National School Lunch Program.

Sponsors do not need to apply for waivers 33, 34, 35 and 37 through MDE. Participation in these waivers remains a local decision. Waiver 36 requires pre-approval by MDE on a case-by-case basis.

Links used in this document:

<https://www.fns.usda.gov/cn/nationwide-waiver-offer-versus-serve-flexibility-senior-high-schools>

<https://www.surveymonkey.com/r/JMS579W>

<https://fns-prod.azureedge.net/sites/default/files/dietaryspecs.pdf>

<https://www.surveymonkey.com/r/JMS579W>

https://www.michigan.gov/mde/0,4615,7-140-66254_50144_73101_94250-509748--,00.html

<https://www.fns.usda.gov/cn/Nationwide-Waiver-extension2-Non-congregate-Feeding-Child-Nutrition-Programs>

<https://www.fns.usda.gov/cn/nationwide-waiver-extension2-meal-service-time-flexibility>

<https://www.fns.usda.gov/cn/covid19/nationwide-waiver-extension-2-parents-guardians-pick-meals>

<https://www.fns.usda.gov/cn/nationwide-waiver-meal-pattern-flexibility-extension-4>

<https://www.surveymonkey.com/r/JMS579W>

<https://www.fns.usda.gov/cn/nationwide-waiver-offer-versus-serve-flexibility-senior-high-schools>