This document is a compilation of questions that DECAL has received from child care providers, families, policy makers, and the public relating to the impact of COVID-19.

The **most recent questions** and answers are in **red** at the beginning of this document. For additional information, **scroll through** the questions and answers on **the following pages** organized by DECAL programs.

We update this document **when we receive new or revised questions and answers OR as new information becomes available.** Visit this webpage often for updates.

DECAL Main Office Reopening:

The August 2nd date for DECAL to resume normal office operations has been **postponed** indefinitely. Until further notice, the DECAL office will continue to be open to the public for walk-ins on Tuesday and Thursday.

Access to the Twin Towers, where DECAL's main office is located, is managed by the Georgia Building Authority (GBA) and the Department of Public Safety. GBA will encourage the public to wear face coverings but will not deny access for failure to do so. Other strategies to help ensure the health and safety of employees and the public (i.e., social distancing, handwashing, frequent disinfecting/cleaning of the office space, etc.) will be in effect.

Governor Brian Kemp's Executive Orders Related to COVID-19:

Governor Brian Kemp signed new Executive Orders on June 30, 2021, to continue Georgia's economic recovery from the COVID-19 pandemic and extend various state rule suspensions. The rules end the public health state of emergency in Georgia effective July 1, 2021. The complete Executive Orders can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2021-executive-orders

Governor Brian Kemp signed new Executive Orders on June 22, 2021, ordering the termination of the public health state of emergency at 12:00 a.m., July 1, 2021, and extending the *Empowering a Healthy Georgia in response to COVID-19* guidance until 12:00 a.m., July 1, 2021. The complete Executive Orders can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2021-executive-orders

Governor Brian Kemp signed a new Executive Order on June 15, 2021, extending the guidance for *Empowering a Healthy Georgia in response to COVID-19* until June 22, 2021. The order also states that "...Ga. Comp. R. & Regs R. 591-1-1-.13 related to field trips is hereby suspended. The complete Executive Order can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2021-executive-orders

Governor Brian Kemp signed new Executive Orders on May 28, 2021, extending the public health state of emergency until June 29, 2021, and providing additional guidance for *Empowering a Healthy Georgia in response to COVID-19* until June 15, 2021. The complete Executive Orders can be found at: https://gov.georgia.gov/executive-action/executive-orders/2021.

Governor Brian Kemp signed a new Executive Order on April 30, 2021, providing additional guidance for *Empowering a Healthy Georgia in response to COVID-19*, effective May 1, 2021 through May 30, 2021. The complete Executive Orders can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2021-executive-orders

Governor Brian Kemp signed new Executive Orders on March 31, 2021, extending the public health state of emergency and providing additional guidance for *Empowering a Healthy Georgia in response to COVID-19*, effective April 8, 2021 through April 30, 2021. The complete Executive Orders can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2021-executive-orders

On March 12, 2021, Governor Brian P. Kemp issued an Executive Order providing revised and continued guidance for *Empowering a Healthy Georgia* in response to COVID-19 effective **March 16, 2021 through March 31, 2021.** The complete Executive Orders can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2021-executive-orders

On November 30, 2020, Governor Brian P. Kemp issued an Executive Order providing additional guidance for *Empowering a Healthy Georgia* in response to COVID-19 effective **December 1, 2020 through December 15, 2020**. The Public Health Emergency is in effect through **January 8, 2021**. The complete Executive Orders can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders

On October 15, 2020, Governor Brian P. Kemp issued an Executive Order providing additional guidance for *Empowering a Healthy Georgia* in response to COVID-19 effective **October 16 through October 31, 2020**. The Public Health Emergency is in effect through **November 9, 2020**. The complete Executive Order can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders

On August 31, 2020, Governor Brian P. Kemp issued two Executive Orders providing additional guidance for *Empowering a Healthy Georgia* in response to COVID-19 and renewing the Public Health Emergency in Response to COVID-19 through October 10, 2020. Both Executive Orders can be found at: https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders

On July 15, 2020, Governor Brian P. Kemp issued an Executive Order providing additional guidance for *Empowering a Healthy Georgia* in response to COVID-19 effective **July 16 through July 31, 2020**. The complete Executive Order can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders

On June 29, 2020, Governor Brian P. Kemp issued an Executive Order renewing the Public Health Emergency and guidance for *Reviving a Healthy Georgia* in response to COVID-19 through **August 11**, **2020**. The complete Executive Order can be found at: <u>https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders</u>

On June 11, 2020, Governor Brian P. Kemp issued an Executive Order effective **June 16** through **June 30**, **2020** providing additional guidance for *Reviving a Healthy Georgia* in response to COVID-19. The complete Executive Order can be found at:

https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders

On May 28, 2020, Governor Brian P. Kemp issued two Executive Orders providing additional guidance for *Reviving a Healthy Georgia* in response to COVID-19 and extending the Public Health Emergency in Georgia until July 12, 2020. The complete Executive Orders can be found at: <u>https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders</u>

On May 12, 2020, Governor Brian P. Kemp issued an Executive Order providing additional guidance for *Reviving a Healthy Georgia* in response to COVID-19, including guidance affecting child care. The complete Executive Order can be found at: https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders

On April 23, 2020, Governor Brian P. Kemp issued an Executive Order titled *Reviving A Healthy Georgia*, effective May 1, 2020, at 12:00 a.m. through May 13, 2020, at 11:59 p.m. Among other instructions, this Executive Order addresses how licensed child care learning centers and family child care learning homes will operate under Section VII Education and Children. The complete Executive Order can be found at: https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders.

On April 8, 2020, Governor Kemp signed an executive order **extending Georgia's public health state of emergency** through **May 13, 2020** and extending the **statewide shelter in place order** through **April 30, 2020**. All provisions of the statewide shelter in place order remain in effect.

On April 2, 2020, Governor Brian Kemp issued an Executive Order requiring Georgians to shelter-in-place to stop the spread of COVID-19. The Executive Order can be found at: https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders.

On March 26, 2020, Governor Brian Kemp issued an Executive Order closing public elementary and secondary schools for in-person instruction through April 24, 2020. The Executive Order can be found at: https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders.

At noon on March 24, 2020, an Executive Order issued by Governor Brian Kemp went into effect. The order, in effect through April 6, 2020, bans gatherings of more than 10 people unless they can always maintain spacing of at least six feet between people. The order does not distinguish between staff, children, and volunteers; any individual present is counted as part of the 10. The Executive Order can be found at: https://gov.georgia.gov/executive-action/executive-orders/2020-executive-orders.

Questions regarding COVID-19 Vaccinations:

Who is eligible to receive a vaccine?

Any employee of a DECAL licensed or exempt program or a Georgia's Pre-K Programs is eligible for a COVID-19 vaccine as of March 8, 2021.

How do I register for a COVID -19 vaccination appointment?

For locations and COVID-19 appointment registration, go to <u>https://myvaccinegeorgia.com/</u> or <u>www.dph.georgia.gov/covid-vaccine</u>.

Will I have side effects from the COVID-19 vaccine?

Although often mild and short-lived, side effects can persist after vaccination for 48 hours. These can include chills, fever, fatigue, headache, and aches that may interfere with an individual's ability to work.

The Department of Public Health recommends scheduling vaccinations when staff have 24-48 hours to recover. Additionally, it is recommended that employees stagger their vaccination times in case multiple people experience side effects.

Can I still test positive for COVD-19 after I am vaccinated?

Vaccination has been shown to protect individuals from severe disease and death. However, you can still test positive or have symptoms from COVID-19 after vaccination. Positive personnel still need to isolate for the <u>full period as defined by CDC.</u> Staff with symptoms should stay home and get tested for COVID-19 immediately.

After my vaccination, is it safe for me to stop wearing a mask and practicing social distancing?

Continued mitigation measures should still be used to prevent spread. This includes using masks indoors, maintaining six feet between individuals, contact tracing, and continuing to work with your local health department. Child care guidance can be found on the DECAL website.

What should I do if I am exposed to COVID-19 after I am vaccinated?

The CDC has <u>updated guidelines</u> for quarantine of individuals who are exposed to COVID-19 after vaccination. Vaccinated persons exposed to someone with suspected or confirmed COVID-19 are not required to quarantine if they meet **all** of the following criteria:

- Are fully vaccinated (i.e., ≥2 weeks following receiving the second dose in a 2-dose series, or ≥2 weeks following receiving one dose of a single-dose vaccine);
- Are within three months following receiving the last dose in the series; and
- Have remained asymptomatic since the current COVID-19 exposure.

Persons who do not meet all three of the above criteria should continue to follow current <u>quarantine</u> <u>guidance</u> after exposure to someone with suspected or confirmed COVID-19.

FOR PROVIDERS: Regarding Georgia's Pre-K Program

For updated information about the 2021-2022 Pre-K year, visit the Pre-K Director webpage at http://www.decal.ga.gov/PreK/ProjectDirectors.aspx.

FOR PROVIDERS: Regarding Child Care Licensing (CCS) and Day Camps

Must providers now allow parents into their programs?

The Governor's newest Executive Order effective July 1, 2021, requires child care programs to once again allow all custodial parents access into their programs. Child Care Learning Centers rule 591-1-1-.22 and Family Child Care Learning Homes rule 290-2-3-.06 state that the custodial parent(s) of the child shall be permitted access to all child care areas of the child care program at any time their child is in attendance. NOTE: Child care providers continue to have the option to perform health screenings for illnesses and require face masks/coverings before allowing family members access to their program.

Can we now resume field trips?

As of June 15, 2021, child care programs may resume field trips. The Governor signed a new Executive Order on June 15, 2021, removing the field trip restriction.

Are child care programs allowed to mix classrooms at the beginning and end of the day?

The Governor's Executive Order signed on June 15, 2021, removes the requirement for child care programs to continue to practice social distancing due to the public health state of emergency. Child care programs may now resume combining classrooms, sharing playgrounds, and sharing mealtime space with others. All CCLC and FCCLH rules and regulations must be followed, and it is recommended that child care programs continue to follow CDC guidance/recommendations. Also, if your program has a confirmed or suspected COVID case, programs must be able to contact trace any children and staff who have been combined with other classes.

Should fully vaccinated child care staff continue to wear masks?

Centers for Disease Control and Prevention's recommendations state that fully vaccinated individuals can resume activities without wearing a mask or staying six feet apart, except where required by federal, state, local, tribal, or territorial laws, rules, and regulations, including local business and workplace guidance. People are considered fully vaccinated two weeks after the second dose in a two-dose vaccination series and two weeks after a single dose vaccine. The CDC's entire guidance for those who are fully vaccinated can be found here: When You've Been Fully Vaccinated | CDC

What are the required sign-in and sign-out procedures? Child care licensing rules and regulations require children to be signed in and out of the child care program every day of attendance. Child care programs can resume the sign-in and sign-out procedures that were followed prior to the COVID-19 pandemic in order to meet the rules and regulations.

Sign-in and sign-out procedures were not included in the child care section of the March 31, 2021 Executive Order and were removed from the Industry, Commerce & Organization section of the May 28, 2021 Executive Order.

KOALA

During COVID AND holidays, we operate shorter hours. Can you add this option to KOALA rather than requiring us to complete a license amendment?

The rules and regulations require that an amendment be submitted to change a licensed program's operating hours. DECAL will consider adding application for amendments to future enhancements for DECAL KOALA so that programs can submit these requests through DECAL KOALA.

Where can we get refreshed on steps to update our operating status in KOALA?

DECAL held a provider webinar on the Required Reporting updates in DECAL KOALA in which we walk programs through how to update their program's operating status. The webinar and presentation are posted at http://www.decal.ga.gov/CCS/Notifications.aspx. Click on the Webinar tab and go to DECAL KOALA Required Report Upgrades.

How do I enter closure dates in KOALA?

DECAL held a provider webinar on the Required Reporting updates in DECAL KOALA in which we walk programs through how to update their program's operating status, including submitting dates for temporary closures. The webinar and presentation are posted at

http://www.decal.ga.gov/CCS/Notifications.aspx. Click on the Webinar tab and go to DECAL KOALA Required Report Upgrades.

FOR PROVIDERS: Regarding CAPS

Is CAPS continuing to offer Emergency Policy Waivers? If so, which waivers are still in effect?

Yes, CAPS is continuing to offer some Emergency Policy Waivers, though certain waivers have expired. The following Emergency Policy Waivers are still in effect:

- Provider rate charged for children not subsidized by CAPS
- Emergency CAPS family fee waiver
- Emergency CAPS maximum reimbursement rate waiver
- Temporary suspension of provider rate changes
- Emergency CAPS payment policies waiver as it pertains to active scholarships being billed if the child is absent and attended at least once since March 1, 2020. Effective October 26, 2020, the provider must be Open for Care or in an approved Temporarily Closed status.
- Emergency CAPS state-approved activity policies waiver.
- Alternate methods for recording arrival and departure

All other Emergency Policy Waivers have expired.

One of my families lost their employment, education, or job training due to COVID-19, and their scholarship is up for redetermination. How will the change in their state-approved activity affect their scholarship?

We understand that many of our families are losing their jobs and are unable to attend an education/training program due to COVID-19. To address this issue, we established the Emergency CAPS state-approved activity policies waiver. This emergency policy waiver ensures that a family's lack of a state-approved activity due to circumstances related to COVID-19 at their redetermination will not impact their scholarship while this policy is in effect.

Can I bill for a child who enrolled in my program after March 1, 2020, and has not yet attended my program due to COVID-19?

A child must have attended your program in-person at least once since March 1, 2020, to be eligible for payment.

How can I maintain social distancing protocols while requiring parents to sign their children in and out of my program?

While COVID-19 affects our communities, we are waiving the requirement that parents must physically sign their children in and out of CAPS programs. However, it is still essential that you maintain accurate attendance records and know who is in your building. Coordinate alternate arrival and departure procedures that adhere to social distancing. For example, you can ask parents to drop their child off with a staff member at the door, and your staff member can sign that child in and out of the program. The arrival and departure information for all children must include the date, child's name, arrival and departure times, and the name of the parent or authorized person who dropped off and picked up the child each day.

If a CAPS child is absent, or if I am closed, can I still charge the family a copayment?

CAPS introduced the ACCESS initiative May 17, 2021. Through ACCESS, CAPS will pay the provider their full published rate for the type of care provided, including the family fee, from May 17, 2021 through service period ending October 2, 2022. CAPS families will not pay the provider any tuition related fees or co-payments for child care services during this period of time.

If a family is unable to pay their CAPS weekly assessed fee because they are temporarily not working, will CAPS pay the family fee?

CAPS introduced the ACCESS initiative May 17, 2021. Through ACCESS, CAPS will pay the provider their full published rate for the type of care provided, including the family fee, from May 17, 2021 through service period ending October 2, 2022. CAPS families will not pay the provider any tuition related fees or co-payments for child care services during this period of time.

Am I still able to apply for CAPS under the Essential Services Workforce priority group?

As of October 1, 2020, CAPS will no longer accept applications under the Essential Services Workforce priority group. However, you may still be eligible for CAPS under a different priority group, or you may be eligible for the SOLVE scholarship program. More information on CAPS eligibility requirements is available at https://caps.decal.ga.gov/en/. Information on the SOLVE scholarship program is available at https://caps.decal.ga.gov/en/. Information on the SOLVE scholarship program is available at http://www.decal.ga.gov/en/.

If I am part of the essential services workforce, am I eligible for a CAPS scholarship?

In April 2020, CAPS introduced a temporary priority group called the Essential Services Workforce priority group to support certain members of Georgia's workforce during this public health emergency. As of October 1, 2020, CAPS will no longer accept applications under the Essential Services Workforce priority group. However, CAPS will re-open this priority group in the future if there is a great need for this priority group and if funding is available. We recommend exploring the eligibility requirements for CAPS (<u>https://caps.decal.ga.gov/en/EligibilityRequirements</u>) to determine if you might be eligible for a CAPS scholarship under a different priority group.

Are providers allowed to continue billing for children who have still only attended once since March 1, 2020?

Currently, providers can still bill for absent children if the child has attended the program at least once since March 1, 2020. However, the provider must be either open for care or experiencing a temporary closure.

Can I continue to bill for children with CAPS scholarships if my program is closed?

Effective Monday, October 26, 2020, child care programs must be open for care to bill for CAPS scholarships, except in the event of a temporary closure. Below, we define "Open for Care" and "Temporarily Closed." The child care provider must meet one of the following conditions to be eligible for payment from CAPS.

- <u>Open for Care</u>: Open for care means that a facility is currently serving children or is accessible to the public in an environment that is ready for operations and able to comply with all licensing regulations. The facility must be ready and available anytime during reported operating hours to participate in a licensing inspection.
- <u>Temporarily Closed</u>: Temporarily closed means that a facility is currently closed but is taking active steps to become "Open for Care" within 30 calendar days of the date of closure. If the facility is unable to open within 30 calendar days, the facility must get written approval from the Department of Early Care and Learning to maintain a status of "Temporarily Closed."

Can I get paid for children with CAPS scholarships if I am closed or open, but some children are not attending?

If your program is open for care or temporarily closed, you are eligible to bill for an absent child with an active scholarship who was present at least once since March 1, 2020. However, if the child's scholarship

has expired, you can no longer bill for that child. Effective September 14, 2020, CAPS resumed paying the appropriate rate based on the school calendar or the type of care provided to the child. Additionally, providers must maintain accurate records required by CAPS policy, including sign in and sign out records.

I am caring for a school-age CAPS student while they participate in their school's virtual learning during typical school hours. Can I charge CAPS for the full-time care of that child?

The current emergency CAPS payment policies waiver allows you to bill CAPS at the full-time rate for a school-age child. This means that CAPS will continue supporting families enrolling school-age children in child care programs while their children participate in distance learning and will pay at the full-time CAPS rate. However, the child must attend your program in-person as they engage in virtual learning. CAPS will not pay for the virtual care of a child.

If I choose to close, how can I bill so that CAPS will continue to pay me?

If you are temporarily closed, defined as a facility that is currently closed but is taking active steps to become "Open for Care" within 30 calendar days of the date of closure, you can indicate your temporarily closed status within the billing portal. Maximus sent instructions on October 31, 2020 that explain how to indicate that you are temporarily closed. Once you indicate that your program is temporarily closed, you can continue to bill as usual.

If you are not temporarily closed, or your facility is currently closed but is not taking active steps to become "Open for Care" within 30 calendar days of the date of closure, you are no longer able to bill for CAPS scholarships.

If I am caring for a child during typical school hours and am also caring for that child during typical before- and after-school hours, can I charge for both the full-time and before-and-after care rates? CAPS will only pay for care up to the full-time rate. If a program cares for a school-aged child for an entire day (including typical before-and-after care hours), the program is providing full-time care.

Will CAPS continue to pay for the full-time care of a school-age child whose family elected to participate in distance learning, even if the school system did not mandate distance learning? Regardless of whether a family chooses to enroll their child in distance learning or their school system is mandating distance learning, CAPS will continue to pay for the full-time care of that child.

If my CAPS scholarship(s) are due for renewal during the pandemic, is my family required to complete the renewal process?

Yes, families are still required to complete the renewal process, including families whose children are not attending their child care program and families whose child care program is closed. If a family is not able to meet the state-approved activity requirement due to COVID-19 related circumstances but meets all other eligibility requirements, the family will still be eligible for renewal. Also, if a family is having trouble obtaining adequate documentation for their renewal, the family should contact their Family Support Consultant, who will work with them to ensure that COVID-19 disruptions will not interrupt their scholarship.

What is the Emergency CAPS State-approved Activity Policies Waiver?

While emergency CAPS policies remain in effect, families who permanently lose their employment or stop attending an education/training program due to matters related to COVID-19 can continue child

care services at the current level through the end of their current certification period. The family does not need to report this permanent loss in activity; however, if they do report, they may see a reduction in their family fee. While emergency CAPS policies remain in effect, if the family is not meeting stateapproved activity requirements at their annual redetermination because of circumstances related to COVID-19, the lack of an activity will not impact eligibility.

Will families lose their CAPS scholarship if they do not return to their child care program?

CAPS recipients will not lose their eligibility if they do not return to their child care program when the CAPS emergency payment policy ends. However, typical CAPS policy requires children to attend during a given week for their child care provider to bill CAPS for the care of that child. Once we have returned to our typical payment policy, a provider will only be able to bill for a child who attended at least once during that week.

Will foster children be mandated to return to school?

Foster children are entitled to the same emergency policies as other CAPS priority groups and would not be mandated by CAPS to return to school. As with other priority groups, typical CAPS policy requires children to attend during a given week for their child care provider to bill CAPS for the care of that child. Once we have returned to our typical payment policy, a provider will only be able to bill for a child who attended at least once during that week.

Some of my families are having trouble getting ahold of the documentation required for their renewals and are concerned that it will impact their scholarship. How can I support those families? Advise families having trouble obtaining adequate documentation for their renewal to contact their Family Support Consultant, who will work with each family to ensure that COVID-19 disruptions will not interrupt their scholarship.

If a child's provider is closed and that child transitions to an open provider, which provider can bill for that child?

By law, we can only pay one provider for each active scholarship. CAPS will pay the program currently associated with that child's scholarship. If a family chooses to transition to a new provider and submits a provider change request to CAPS, CAPS will pay that family's new provider.

If my program remains open, but my local school system and other child care programs in my area have closed, can I accept new children for care?

It is the child care provider's decision to accept new children for care. As a precaution, you can ask families if they have been contacted by or are being monitored by the local health department. This information can help you make informed decisions about whether to accept children into your program. Additionally, you can conduct daily health checks when children or other persons arrive at your program. These health checks might include taking the temperature of each child and adult who enters the building and asking questions about whether the child, or anyone to whom the child has been exposed, is experiencing a fever or cold-like symptoms.

I'm having issues billing. Who can I contact to get help on this issue?

Report your billing issue–related to COVID-19 or otherwise–to the Maximus support desk at 1-877-755-6522. If Maximus cannot resolve your billing issue, submit the billing issue to us on our website at https://caps.decal.ga.gov/en/ContactSupport/.

If a family's scholarship is currently up for renewal, how might this affect my ability to bill on that family?

Renewals will not be impacted at this time because CAPS staff members are working remotely to process renewals.

I know I must continue to maintain accurate attendance records per CAPS policy. However, will I get payment for a child if I mark that child as absent?

You will still be able to bill for children using the billing portal. However, we are making a change to the billing portal, so you can mark a child absent due to COVID-19 related circumstances. This change allows you to maintain accurate attendance records and ensures CAPS will continue payment for that child. However, the child must have attended at least one day since March 1, 2020 to be eligible for payment.

Is CAPS currently accepting new applicants?

Yes, CAPS is currently accepting new applicants. However, applicants must continue to meet our established eligibility requirements. Information on our eligibility requirements is available at caps.decal.ga.gov. Families may apply online at <u>www.gateway.ga.gov</u>.

How can I bill for a child who was only attending my program part-time but now requires full-time care?

We have updated the billing portal, so you will have the option to bill for full-time care on a child with a variable scholarship whenever you bill for these affected weeks. For school-aged children who only have a before and after school scholarship, but you are caring for full-time, you will be reimbursed the difference between the before and after rate and the full-time rate via a payment adjustment. Maximus will contact providers with affected scholarships to complete the appropriate form to receive the payment adjustment.

How will I be paid during this time?

The billing portal will remain open, and providers can continue to submit invoices for payment processing. Payments can be processed by the CAPS program remotely. We anticipate no disruptions in payments to child care providers.

FOR PROVIDERS: Regarding Quality Rated

Classroom Observations

How soon after this public health emergency will QR classroom observations resume?

Due to the public health emergency, we anticipate that all official classroom and family child care learning home observations will be suspended until early 2022. Quality Rated Assessors will need to conduct training observations and reliability rechecks before official observations can resume.

When is Quality Rated moving to FCCERS-3?

Quality Rated staff will begin training on FCCERS-3 during 2021. Child care programs should not expect to be assessed with FCCERS-3 before 2022.

Rating Incentive Bonuses

After earning a star rating, what kind of incentives are available to programs?

Bonus packages may be available to programs depending on the Quality Rated application date and on the availability of funding. Materials received in the bonus package are determined by your star rating.

In addition, some programs rated under a 2020 or 2021 cohort are eligible for bonuses and workforce incentives. Amounts for each are based on the cohort selected. For more information about the 2020 Rating Incentives, see the Rating Incentive FAQ on your QR account page: https://qualityrated.decal.ga.gov/Shared/Help.aspx?v=ccrra

If I signed up for Cohort 1 (2020), but I receive my rating at a later date, will I still receive the Rating Incentive Bonus for Cohort 1?

Yes, Rating Incentive Bonuses will be paid according to the cohort you originally signed up for, unless you receive a 0-rating and are re-rated under a later cohort; in that case, the later cohort's Rating Incentive Bonus would apply.

Portfolio

For programs getting ready to submit their portfolios for QR, will there be any consideration for programs that cannot get CPR/FA renewals?

For portfolios submitted before September 1, 2021, CPR and First Aid training for staff whose training expired on March 1, 2020 or after will continue to be counted as valid for Quality Rated portfolio scoring purposes. Affected programs must upload a written statement in the portfolio indicating that training could not be obtained due to the current health situation. This statement must include the names of staff persons who could not complete initial training or recertification and the expiration dates for CPR and First Aid training for current staff. The statement should be uploaded in the Written Health Information section in Standard 2. For portfolios submitted September 1, 2021 or after, the written statement will not be accepted.

Will there be any consideration regarding annual training hours?

For any portfolio submitted after May 15, 2020, 18 months of training will be counted instead of the usual 12 months. This temporary change will be in place for all portfolios submitted before September 1, 2021. This affects Standard 1.3 for administrators and Standard 1.6 for lead and assistant teachers. Example: Portfolio marked Ready to Submit on June 1, 2020 would have a training window of December 1, 2018 – June 1, 2020 (instead of June 1, 2019 – June 1, 2020).

What do programs do if they are submitting their QR portfolio and their program has been closed for 30 days before the date of submission? How should Ratios (Standard 5) be reported?

On the ratio screens, programs will need to enter a date that is no more than 30 days before the portfolio submission date. For the ratio counts, programs will need to enter ratios based on attendance from the last week that children were present.

CAPS Providers

I am a CAPS provider. Will I be able to accept new CAPS children after May 1, 2020 if I am not signed up for a QR cohort group or have my star rating?

After August 1, 2021, new families may select only providers that are rated or are signed up for a cohort. If a provider is not star-rated, or in the process to complete their rating, families will need to move to a rated provider at their next renewal (after January 1, 2022).

How has the COVID-19 public health emergency impacted the CAPS/QR 2020 deadline?

Because of the COVID-19 crisis, DECAL has extended the December 31, 2020 deadline requiring all CAPS providers to be Quality Rated (also known as the 2020 Goal). The new deadline is December 31, 2021.

Annual Verification/Renewal

Is the COVID-19 public health emergency impacting the Quality Rated annual verification process?

During 2021, programs that are not required to be rerated will receive an automatic check-in. Traditionally, these programs also have the option of a CQI grant or the option to request a new observation; however, these two options will not be available in 2021.

Can re-ratings apply to currently rated programs? We really want a chance to improve our 1-star rating.

Due to the number of programs that still need to receive an initial rating, traditional Requests for Reassessment will not be available in 2021. However, if your program received a temporary rating in 2020 that will expire in 2021, you can potentially increase your rating when you choose and complete Option B.

FOR PROVIDERS: Regarding Staff/Workforce Training

How do I find DECAL-approved trainings that are offered online?

GaPDS includes a list of DECAL-approved online trainings through the *Find Scheduled Training Sessions* tab (<u>https://gapds.decal.ga.gov/Trainings/Scheduled</u>). Select "Online" under *Training Format* and hit the *Search Training* button. Information on approved online trainings will appear.

How do I know if a scheduled training is canceled?

If you or your staff registered for training through the Georgia Professional Development System (GaPDS), you will receive a cancelation email if the training is canceled. You may also check the Training Cancelations webpage on GaPDS for the most up-to-date information. If you or your staff did not register for the training through GaPDS, you will need to contact the trainer directly to find out if the training has been canceled.

FOR PROVIDERS: Regarding Criminal Records Checks and Personnel

I'm having a difficult time finding a fingerprint place that will do the fingerprints for the background check. Some locations are open but are not doing the service. What can I do?

I'm having many issues keeping teachers in the building. My committed teachers are following guidance about not coming to work if they are experiencing any symptoms. Therefore, I'm trying to hire some temporary substitutes to help during this time. However, I've called five of the closest locations to Canton, and none are doing the fingerprinting. How should I handle this?

If we have an employee who needs the Gemalto background clearance and can't find a facility in their area to conduct the fingerprinting...what are the guidelines for this?

I need to start hiring for fall. Are CRCs available during this time to run those for future hires? According to Gemalto, there are locations open in the state to complete background checks. Although there are fewer open locations, there are enough locations available in each of Gemalto's eight regions (<u>https://www.aps.gemalto.com/ga/GA_regions_html/GA_Regions_Main.htm</u>) for the state to comply with the mandatory background check requirements. DECAL acknowledges that many individuals might

have to drive farther than normal to comply with this law. DECAL will continue to monitor the availability of open locations to obtain a background check.

I am trying to keep all my staff, but right now I cannot afford to. I went from 255 kids to 25. I am trying to divide hours for everyone and file unemployment, but I have one employee who refuses to work or give me an excuse why. Can I legally terminate her?

DECAL cannot give legal advice to child care programs, so we recommend that you check with your program's attorney or legal advisor.

What is the rule for family child care background check?

The rules regarding background checks for family child care learning homes can be found in the document *Rules and Regulations Family Child Care Learning Homes* 290-2-3-.21.

What do we do about people needing background checks, or more specifically, updated background checks (due every five years)? Some cities, like Sandy Springs, have shuttered services. Does that apply to background checks?

Currently, there are enough fingerprinting locations open in the state. Currently, there are no changes to the background check requirements. All potential and current employees must have a valid background check to be present in the facility while children are present for care.

What are your suggestions for background checks if the fingerprinting place is closed?

Currently, there are enough fingerprinting locations open in the state. Currently, there are no changes to the background check requirements. All potential and current employees must have a valid background check to be present in the facility while children are present for care.

What about out-of-state background checks? We can't find a place open to do fingerprint cards.

You need to contact local law enforcement to see how they can help with fingerprinting cards to be sent to another state. If DECAL cannot get the necessary background check clearance information from another state, the department will cannot issue a satisfactory Comprehensive Background Check Determination; however, if the background check using Gemalto is clear, DECAL will issue a satisfactory determination permitting the employee to be present as long as they are supervised by a staff member who has a valid Comprehensive Background Check Determination.

How will you address background checks that are expiring? Our fingerprint location is closed right now.

Currently, there are enough fingerprinting locations open in the state. Currently, there are no changes to the background check requirements. All potential and current employees must have a valid background check to be present in the facility while children are present for care.

At this time will my requests for background checks be processed?

Yes, unless the DECAL offices are ordered closed, DECAL staff processing background checks will be in the office as usual.

About the Office of State Administrative Hearings

Will the Office of State Administrative Hearings (OSAH) be scheduling or hearing DECAL appeals?

Yes, OSAH is currently scheduling and holding in person hearings at their office. If you are unable to attend a hearing in person, you must contact OSAH at (404) 657-2800 or <u>general@osah.ga.gov</u> and request that the hearing be held by telephone or video. If you have a matter before any court other than OSAH, you will need to contact that court system directly.

FOR PROVIDERS: Miscellaneous Resources

For new guidance on COVID-19 for child care providers, go to:

https://decaldownload.buzzsprout.com/211637/5054117-episode-57-covid-19-guidance-for-georgiachild-care-programs

Where can I access the recording of the Town Hall in which Governor Kemp and Dr. Toomey from the Georgia Department of Public Health spoke to child care providers?

Go to http://www.decal.ga.gov/Video/2020-08-

<u>11 Georgias Virtual Child Care Provider%20 Town Hall with Governor BrianKemp and Dr Kathlee</u> <u>n_Toomey.mp4</u> to access the recent Town Hall meeting hosted by DECAL.

Where can I get supplies to meet CDC guidelines and the requirements in the Governor's Executive Order such as PPE and sanitizer?

DECAL does not endorse third party vendors. However, DECAL is providing the following charts of vendors whom providers can contact about purchasing PPE and other needed supplies. This list is provided for your convenience only and is NOT an endorsement of any vendor. DECAL does NOT guarantee any of the representations made by any vendor. DECAL does not benefit in any way from the posting of this information. If a dispute or conflict arises with any vendor, DECAL will not be a party to the matter, and the dispute must be resolved between the provider and the vendor.

N-95 Masks			
Company Name	Contact Name	Telephone/Contact Info	
Fastenal	Customer Service	404-351-7881	
SI Medical	Jeffery Sterling	866-827-4104	
Streamline	Rhonda Polhill	770-289-9338	
Body Amour	Chris Lizotte	603-567-4506	
Day to Day Necessities	Kim Craig	248-773-2829	

Nitrile Gloves

Company Name	Contact Name	Telephone/Contact Info
Fastenal	Customer Service	404-351-7881
Sara Glove	Customer Service	866-664-7272 Ext. 106
Grainger	Aaron Shoemaker	404-909-4024
Uline	Customer Service	800-295-5570
Airgas	Judy Robledo	855-625-5285 Ext. 3649
VWR/Avantor Sciences	Nicole Clark	404-693-7963
CMC Medical	Greg Meerbaum	561-703-8865
RJ Medical	Mark Jackson	205-259-9212

Isolation Gowns

Company Name	Contact Name	Telephone/Contact Info	

Sourceline	Paulette Rakestraw	770-294-1039
CMC Medical	Greg Meerbaum	561-703-8865

Surgical Gowns

Company Name	Contact Name	Telephone/Contact Info
Sourceline	Greg Meerbaum	561-703-8865
Sara Glove	Customer Service	866-664-7272 Ext. 106
Day to Day Necessities	Kim Craig	248-773-2829
CMC Medical	Greg Meerbaum	561-703-8865

Surgical Masks

Company Name	Contact Name	Telephone/Contact Info
US21	Daniel Leija	703-560-0021 Ext. 143
Fastenal	Customer Service	404-351-7881
Streamline	Rhonda Polhill	770-289-7881
Cintas	Craig Frayall	770-987-3007
F3EA	Raul Joyner	912-659-4064
Flagrant International	John Ramirez	954-804-5150
Elixir Therapeutic	Martin Hudler	917-991-7665

DuPont Tyvek Suits

Company Name	Contact Name	Telephone/Contact Info	
CMC Medical	Greg Meerbaum	561-703-8865	
Airgas	Judy Robledo	855-625-5285 ext. 3649	
Grainger	Aaron Shoemaker 404-909-4024		
Coveralls Direct	www.coverallsdirect.com	770-987-3007	

Vendor	Contact Name	Contact Phone Number	Contact Email Address
Blue Hill Buffalo Consulting, LLC	Andrew Holt	917-476-5818	aholtnyc@gmail.com
Contract Furnishing International, Inc.	Joe Griffin	941-374-3960	joe@contract-furnishings.com
Fastenal	Richard Warren	252-944-1772	riwarren@fastenal.com
Fisher Scientific	David Holden	832-385-2187	david.holden@thermofisher.com
FRC global Group, LLC	Richard Cohen	631-252-4169	covid19@frcglobalgroup.com
Henry Schein	Rob Irwin	661-244-7090	Rob.Irwin@HenrySchein.com
Medical Solutions Inc.	Pat Willette	952-484-5454	pwillette@medicalsolutionsinc.com
Medline	Lucas McGovern	847-837-2820	Imcgovern@medline.com
MedSupply Partners	Clifford Collins	770 973-0250	ccollins@medsupplypartners.com
Procom Products, Inc.	Nickholas Doty	574-387-0866	ndoty@procomproducts.com
Red One Medical Devices, LLC	Cal Chancy	912-704-5502	cchancy@redonemedical.com
The HB Group	Henri Bonan	801-580-5138	henri.bonan@thehbgroup.com
Thomas Scientific	Lewis McMillan	484-280-8133	lewis.mcmillan@thomassci.com
VWR	Nicole Clark	404-693-7964	nicole.clark@avantorsciences.com

A DECAL partner shared the following link as a resource for PPE and other supplies to help combat COVID-19: <u>public facing COVID-19 Essential supplies access request page</u>.

Is there or will there be any financial support for programs impacted by COVID-19?

The U.S. Chamber of Commerce Foundation has launched the <u>Save Small Business Grant Fund</u>. Funded by contributions from corporate and philanthropic partners, the program provides \$5,000 supplemental grants to small employers in economically vulnerable communities. These grants will be available to businesses employing between 3 and 20 staff in certain Zip codes. The grant application opens on **April 20, 2020**.

Visit the Save Small Business Fund page for more information, including eligibility and applications.

Can you provide additional information on the Paycheck Protection Program?

After the provider webinar on April 8, 2020, we received several questions about the Paycheck Protection Program small business loans. Information about these loans can be found at https://www.sba.gov/funding-programs/loans/coronavirus-relief-options/paycheck-protection-program-ppp.

Can you provide additional information related to potential funding and/or supports from the Coronavirus Aid, Relief, and Economic Security (CARES) Act?

As of 4/13/2020, DECAL has not received any official notification or guidance related to the CARES Act. Because we know there are funds earmarked for supporting child care, we are preparing to quickly disburse funds awarded from the CARES Act. However, we cannot release those plans and begin the process for disbursement until we receive official notification and guidance. We anticipate that any plan will include direct supports to child care providers, including child care learning centers and family child care learning homes.

Where can we find financial assistance for non-profit child care centers who would lose money weekly following the new guidelines.

DECAL has temporarily suspended some rules to meet the Governor's Executive Order and to best meet the challenges related to COVID-19. While we understand that these changes may have a financial impact, they are necessary to follow the guidelines highlighted in the Executive Order. DECAL is currently supporting programs by continuing to make payments where possible and will move swiftly to allocate any financial or state assistance allocated for early education in recently passed legislation.

If we choose to be open during these times, can providers receive help with cleaning supplies to continue sterilizing?

Any funds from the Coronavirus Aid, Relief, and Economic Security Act (CARES) allocated for this purpose will be distributed as soon as DECAL has guidance from the legislation and from the Governor's Office.

Is Pre-K the only program that will continue to receive funds?

No, DECAL is continuing to make CAPS payments.

If my child care business is closing, what resources are available to my business or my staff?

Governor Brian P. Kemp announced that Georgia has received an official statewide disaster declaration from the U.S. Small Business Administration (SBA). This declaration will provide assistance in the form of SBA Economic Injury Disaster Loans to impacted small businesses in all 159 counties in Georgia. The application is now live, and Georgia small business owners can go directly to the SBA for assistance. Small business owners should visit www.disasterloan.sba.gov for information and the application. Loans

are available for small business and non-profit organizations. While terms will be established on a caseby-case basis, many will have a thirty-year repayment term with first payments not due for up to twelve months. Businesses should expect to provide a tax transcript, financial statements, and a profit and loss statement. Interest rates will range from 2.75% to 3.75%.

Information on filing an unemployment claim, details on how employers must file partial claims, and resources for other reemployment assistance can be found at <u>www.gdol.ga.gov</u>, and Georgians may visit <u>www.EmployGeorgia.com</u> for access to today's job opportunities.

FOR FAMILY CHILD CARE LEARNING HOME PROVIDERS: Miscellaneous Resources

We in home day cares are also an important part in child care. If we're out of work because everyone is keeping their kids home, and we will not qualify for unemployment, we can't afford to take out a loan to pay later. What help are we going to get in this government bailout to help us through these hard times?

We understand the concerns and challenges related to family child care learning homes and COVID-19. We are including Family Child Care Learning Homes in our current supports, and we are waiting legislative guidance related to the Coronavirus Aid, Relief, and Economic Security (CARES) Act from the U.S. Congress. Any supports in legislation will include, if guidance permits, Family Child Care Learning Homes.

For CACFP or SFSP Sponsors/Participants

CHILD AND ADULT CARE FOOD PROGRAM (CACFP)

What does the meal times waiver allow specific to suspension of CACFP meal service times during the public health emergency?

Child Nutrition Response #88, <u>Nationwide Waiver of Meal Times Requirements for School Year 2021-</u>2022, allows state agencies to suspend the meal service times established by the program operator. The waiver is intended to provide maximum flexibility to help state agencies support the unique needs of local program operators during the public health emergency. However, the waiver still requires operators to establish and keep the application current with meal service times. DECAL must know your actual meal service times, so DECAL reviewers will know what time meal services will begin and end. While these waivers are available through June 30, 2022, FNS expects schools and child care providers to use the flexibilities for only the duration and extent that they are needed.

Which components under CACFP does the non-congregate waiver apply to?

Child Nutrition Response #87, <u>Nationwide Waiver to Allow Non-congregate Meal Service for School Year</u> <u>2021-2022</u>, applies to all CACFP components—child care centers, adult day care centers, outside-schoolhours care centers, at-risk afterschool care programs, family child care learning homes, and emergency shelters.

Can CACFP sites that are open implement the non-congregate and meal time nationwide waivers?

Yes, however, FNS expects CACFP sites to use the non-congregate and meal time waivers only for the duration and extent they are needed. These waivers are intended to provide temporary flexibility to

child care providers as they work to offer nutritious meals while safely and successfully reopening. The nationwide waivers to allow meal service time flexibilities and non-congregate feeding in the Child Nutrition Programs during the coronavirus pandemic do not require that a CACFP site be closed. Under these waivers, day care homes and centers that are open can provide meal service on site to participants in attendance. They can also arrange meal service pick-ups and/or provide meal delivery for participants temporarily not in attendance. If the CACFP operator determines there is a need and it is logistically feasible to implement these options, it can do so for all or part of its participants.

Are child care centers required to serve non-congregate meals to enrolled children who are not physically in care on some, or all, days of the week the center is operating? For example, some children may be receiving virtual instruction due to an increased risk of severe illness and/or special health care needs, while others are being cared for onsite.

Child care centers participating in CACFP are subject to the congregate feeding requirement that restricts meal service to receiving care onsite. However, a state may elect to use the waivers allowing non-congregate and parent-pick up, and these waivers can help program operators to continue safely serving meals to children as they work toward reopening. FNS expects these waivers to be used only for the duration and extent they are needed. If a center chooses to use these waivers to provide non-congregate meals to any of the children enrolled in care, then meals must be offered to every enrolled child, whether they attend virtually or in-person. The center has the discretion to choose how non-congregate meals will be offered, e.g., grab and go or meal delivery. Parents and guardians have the option to choose not to receive CACFP meals for their children. This also applies to day care homes.

Under the non-congregate waiver, can CACFP operators deliver meals directly to children or adult participants' homes?

Yes. If the CACFP operator determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with DECAL approval and adherence to all federal confidentiality requirements. Meal service times would also have to be waived, per Child Nutrition Response #88, *Nationwide Waiver of Meal Time Requirements for School Year 2021-2022*. Delivery could be completed by mail or delivery service, or hand delivered by CACFP staff, volunteers, community organizations, or others. DECAL will consider the capacity of the CACFP operator to execute such an approach effectively, including meeting state or local food safety requirements. This option is available to CACFP operators that can adhere to confidentiality and logistical requirements. Only meals delivered to enrolled children or adult day care participants or children in CACFP at-risk programming will be reimbursable.

Can a child care center that operates CACFP and is closed due to COVID-19 provide non-congregate meals to enrolled children?

While FNS does not expect this to be a common issue as we move toward reopening, FNS recognizes that program operators need flexibility to continue safely serving meals to children under a variety of local circumstances. Child Nutrition Response #87, *Nationwide Waiver to Allow Non-Congregate Meal Service for School Year 2021-2022*, provides CACFP institutions and facilities the ability to provide meals through a variety of methods, including pick-up schedules with designated times for distribution; approval is required by DECAL prior to implementation. The maximum number of meals that may be offered to each child remains the same as under regular CACFP operations. DECAL may approve a distribution or pick up approach that includes meals for multiple days, up to one week at a time.

May a child care center or day care home claim reimbursement for CACFP meals that children take home to consume on weekend days when they are not in care?

CACFP centers and day care homes that are approved for non-congregate feeding and meal service time flexibility may provide meals for a child to consume on weekends, if the facility is approved to serve meals on weekends and the child is enrolled for weekend care. That means the facility must be licensed and approved to provide weekend care, even if the center or day care home is not providing care on-site due to COVID-19. The state-sponsor agreement must indicate the days and types of meals for which the facility is eligible to claim reimbursement. For example, if a facility is licensed to provide child care seven days a week and a child is enrolled to attend child care Thursday through Saturday, the facility may claim meals served to the child on those days, even if the child is not physically in care due to COVID-19.

May school-age children who are attending school virtually and who also are enrolled and attending child care during the day receive meals through both CACFP and school meal programs?

Yes. Students enrolled in both school and child care may receive meals through multiple Child Nutrition Programs. However, state agencies must have an integrity plan with appropriate measures in place to ensure that program accountability is maintained and that program meal limits for the SBP, NSLP, (including SSO), and CACFP are not exceeded. Specific decisions regarding development and implementation of this plan are at the discretion of DECAL. However, the plan must include the processes the state agency is implementing.

Can emergency shelters participate in CACFP as independent institution, or must they participate through a sponsoring organization?

An emergency shelter may participate either as an independent institution, which has an agreement directly with the state agency, or as a facility under a sponsoring organization.

Which types of emergency shelters are eligible to participate in CACFP under the American Rescue Plan Act (ARP)?

Any public or private non-profit organization, or its site, that provides temporary shelter and food service to homeless children (i.e., meets the regulatory definition of emergency shelter under 7 CFR 226.2), is eligible to participate in CACFP. Beginning March 11, 2021, and during the COVID-19 public health emergency, emergency shelters that meet this definition are also eligible to receive reimbursement for meals and snacks served to individuals under age 25. Emergency shelters participating in CACFP must serve children, which may include persons age 18 and under and persons with disabilities as defined under 7 CFR 226.2. An emergency shelter may provide services to other adults; however, only the meals served to young adults under the age of 25 are eligible for reimbursement.

Are emergency shelters that contract with and are operated by for-profit companies eligible for CACFP?

No, 7 CFR 226.2 defines an emergency shelter as a public or private non-profit organization.

How can emergency shelters that are eligible to participate in CACFP also operate under ARP?

Emergency shelters must have valid agreements with the CACFP state agency to participate. To receive reimbursement, emergency shelters must amend their current agreement or, if they are new to CACFP, apply and sign an agreement to operate the program. CACFP regulations at 7 CFR 226.11(a) allow payments to be made only to institutions operating under an agreement with the state agency and only for the meal types that are specified in the agreement and served at approved emergency shelters.

However, 7 CFR 226.11(a) allows state agencies to establish policies that allow the reimbursement of eligible meals served in the calendar month preceding the calendar month in which the CACFP agreement is executed. For example, a state agency may allow an emergency shelter that enters into an agreement on June 30 to submit claims for reimbursement for meals served in both May and June. However, reimbursement cannot be paid until the agreement is signed.

Do emergency shelters need to keep separate track of the number of young adults under age 25 receiving meals/snacks?

No, emergency shelters do not have to separately track participation of young adults from other meal service recipients. However, they must maintain records of daily attendance and meal counts.

How does an emergency shelter document that meals are served to eligible persons?

To support claims for reimbursement, emergency shelters must document meals that have been served to eligible residents under the age or 25, at the time of meal service. At a minimum, emergency shelters must maintain meal counts, daily attendance, and a list of residents by name (or another identifier) and date of birth.

Which types of meals are emergency shelters allowed to claim?

Emergency shelters may claim meals at the free rate for the number and types of meals that are specified in their agreements, which may include a maximum of three [3] meals—breakfast, lunch, and supper—for each eligible resident, each day.

Which meal pattern requirements apply to young adults under the age of 25 in an emergency shelter?

Emergency shelters must follow the meal pattern requirements for ages 13 through 18, under 7 CFR 226.20(c), when serving meals to young adults under the age of 25. Remember: The meal pattern establishes the minimum requirements for a meal or snack. Larger portions may be served to meet the nutritional needs of growing youths and young adults.

Is offer versus serve a meal service option for emergency shelters?

No, emergency shelters are not approved to use offer versus serve.

Can emergency shelters receive retroactive reimbursement, under the ARP provision, for meals and snacks served to individuals under the age of 25, before FNS issued implementation guidance? Yes, retroactive reimbursement back to March 11, 2021, is available to emergency shelters that have documentation to support the service of reimbursable meals and snacks to young adults under the age of 25.

How will retroactive reimbursements be processed under the ARP provision?

For emergency shelters that have already submitted a March 2021 claim for reimbursement to the state agency, a revised March 2021 claim may be submitted to the state agency to include the additional meals and snacks served to these newly eligible participants. For the purpose of ensuring timely adjustments, state agencies should promptly inform all participating emergency shelters that retroactive reimbursements are available effective March 11, 2021 for reimbursable meals and snacks served to young adults under the age of 25 who are experiencing homelessness.

Can emergency shelters that just submitted a CACFP application to their state agencies claim reimbursement for meals and snack served since March 11, 2021, before they were approved to participate in CACFP?

Yes, 7 CFR 226.11(a) allows state agencies to establish policies that allow reimbursement for eligible meals and snacks served in the calendar month preceding the calendar month in which the CACFP agreement is executed. However, the agreement must be executed before the emergency shelter may receive program payment. New and existing CACFP emergency shelters must have meal service records that document meal counts, by type; demonstrate compliance with meal pattern requirements; and track food service revenues and expenditures to support claims for reimbursement.

Under the area eligibility waiver (Nationwide Waiver #93), how long are day care homes eligible to receive the tier 1 reimbursement rates?

In states that elect to use it, the waiver suspends requirements for day care home classification to allow all providers to receive tier 1 reimbursement for meals and snacks served from July 1, 2021 through June 30, 2022. After this period ends, sponsoring organizations must once again follow the requirements under 7 CFR 226.15(f) to determine tier 1 eligibility for each day care home that had not previously been classified as tier 1 using current school or census data for free or reduced-price applications.

Normally, when school or census data is used to classify a day care home as tier 1 based on area eligibility, the classification is for five [5] years. Day care homes that had been classified as tier 1 based on area eligibility data prior to July 1, 2021 would continue to receive tier 1 reimbursements rates through the end of the previously determined five-year period.

Are meals served to providers' own children eligible for tier 1 reimbursement?

For providers receiving the tier 1 reimbursement rate under the waiver, meals and snacks served to their own children may be reimbursed at the tier 1 rate if the criteria listed under 7 CFR 226.18(e) are met. Payment may be made for meals and snacks served to the provider's own children when (1) such children are enrolled and participating in the child care program during the time of meal service (2) enrolled nonresident children are present and participating in the child care program, and (3) providers' children are eligible to receive free or reduced-price meals. Meals may not be claimed for providers' own children if those three [3] criteria are not met.

Under Nationwide Waiver #91, child and adult care providers are permitted to request a waiver to offer low-fat (1%) flavored milk. What age/grade group does this apply to?

This waiver applies to children age 6 and older and adults. Child and adult care providers that request and receive state approval to use this waiver may serve low-fat (1%) flavored milk to children age 6 and older and adults.

Can CACFP facilities provide non-congregate meals during this public health emergency?

Yes. As of March 20, 2020, the USDA approved a nationwide waiver to allow non-congregate feeding in CACFP. The USDA recognizes that waiving the congregate meal requirement is vital to ensure appropriate safety measures for the purpose of providing meals and meal supplements. For more information regarding this waiver, select <u>Response #87</u>.

**Reference the Waiver Chart under the Additional Resources for Nutrition Programs section to view all waiver effective dates. **

Is the meal pattern waiver a sponsorship waiver to be administered case by case, or is it an approval for specific centers or homes? What is required to be submitted for approval?

It is both. If you are having a problem meeting the meal pattern requirements at all your sites, complete part 1 of the <u>Meal Pattern Waiver Request Form</u>. If you are having a problem meeting the meal pattern requirements at individual sites, you only need to complete part 2 of the form. The waiver start date, meal component, and a written justification is required for approval. **NOTE:** Beginning July 1, 2021, the meal pattern flexibility waiver for CACFP will only waive the following three [3] meal pattern requirements. All other meal pattern requirements will remain in effect.

- 1. At least one [1] serving per day, across all eating occasions, must be whole grain rich.
- 2. The crediting of grains by ounce equivalents must be fully implemented by October 1, 2021.
- 3. Low-fat milk (1 percent) must be unflavored.

For more information regarding this waiver, select <u>Response #91</u>.

Reference the Waiver Chart under the Additional Resources for Nutrition Programs section to view all waiver effective dates.

During the public health emergency, can CACFP emergency shelters receive reimbursement for meals and snacks served to participants older than 18 years of age?

Yes. USDA provided guidance to implement section 1107 of the American Rescue Plan Act of 2021, which allows state agencies to reimburse emergency shelters for meals and snacks served to young adults, ages 18 through 24, who reside in an emergency shelter participating in CACFP under section 17(t) of the NSLA or receive services from an emergency shelter participating in CACFP as an at-risk center under section 17(r) of the NSLA. Reimbursement is authorized from the date of enactment on March 11, 2021, until the date the COVID-19 public health emergency is lifted. For more information, reference the following guidance: <u>Reimbursement for Meals and Snacks Served to Young Adults in the Child and Adult Care Food Program: Implementation Guidance for State Agency dated April 9, 2021</u>.

Are there any mealtime restrictions specific to CACFP during the public health emergency?

As of March 20, 2020, the USDA approved a nationwide waiver to allow flexibility in meal service time requirements to support streamlined access to nutritious meals. **NOTE**: Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any <u>new</u> requests for waivers must be completed through an online Waiver Participation Form in the new **USDA Waivers Module** in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under <u>COVID-19 Resources</u>; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the <u>Training and Technical Assistance webpage</u>, and the <u>GA ATLAS Waiver Guide</u> can be found under <u>COVID-19 Resources</u> in the *Nutrition Waivers – Waiver Request Forms* section. **NOTE: If you have already submitted and have been approved to use a waiver, you do not have to submit the request again.**

For general questions about the waiver, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA mailbox at <u>NutritionTA@decal.ga.gov</u>.

Can CACFP Institutions deliver meals?

Yes. If the CACFP operator determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with state agency approval and adherence to all federal confidentiality

requirements. If applicable, any state agency meal service times would also have to be waived, per the Meal Service Time nationwide waiver. Delivery could be completed by mail or delivery service, or hand delivered by CACFP staff, volunteers, community organizations, or others. This option is available only to CACFP operators that provide care for enrolled children. **NOTE:** Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any **new** requests for waivers must be completed through an online Waiver Participation Form in the new **USDA Waivers Module** in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under <u>COVID-19</u> Resources; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the <u>Training</u> and <u>Technical Assistance webpage</u>, and the <u>GA ATLAS Waiver Guide</u> can be found under <u>COVID-19</u> Resources in the *Nutrition Waivers – Waiver Request Forms* section. **NOTE:** If you have already submitted and have been approved to utilize a waiver, you do not have to submit the request again.

For general questions about the waiver, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA mailbox at <u>NutritionTA@decal.ga.gov</u>.

Why is CACFP not included in the Food Service Management Company (FSMC) contract nationwide waiver?

On January 6, 2021, FNS extended the <u>Nationwide Waiver of Food Service Management Contract</u> <u>Duration in the National School Lunch Program and Summer Food Service Program (SFSP)</u> waiving, for all state agencies, school food authorities (SFAs), and SFSP sponsors the FSMC contract duration requirements at 7 CFR 210.16(d) and 225.6(h)(7). FSMC contracts that expire by or around June 30, 2021, may be extended through school year 2021-2022 (June 30, 2022). To ensure program integrity during this time, extended FSMC contracts are limited to one-year only.

Additionally, SFAs and SFSP sponsors may, pursuant to 2 CFR 200.320(f)(2), use the emergency noncompetitive procurement method to negotiate a new one-year contract for school year 2021-2022. To ensure program integrity moving forward, contracts resulting from noncompetitive proposals may not exercise renewal options. CACFP was not included in this nationwide waiver because CACFP regulations do not have similar restrictions on the duration of FSMC contracts. Although flexibilities provided at 2 CFR 200.320(f)(2), noted above, apply to all child nutrition programs, including CACFP.

What is acceptable sign-in and sign-out documentation during COVID-19?

A facility (center/home) that provides onsite care or virtual instruction during COVID-19 may use the following methods to record sign-in and sign-out documentation (also called time-in and time-out documentation, which records the time-in daily attendance). Note: Accurate daily attendance records must be recorded separately from a facility's meal count records.

- 1. If the facility (center/home) has a computer or keypad system inside, facility staff may sign children in and out of care or record daily attendance during virtual instruction. This is only acceptable if no other option is available.
- 2. If the facility can set up a tablet outside, families may sign children in and out of care electronically. The tablet must be disinfected after each use.
- 3. If the facility uses a paper sign-in system outside, families may sign children in and out of care. The writing utensils must be sanitized after each use.

4. If the facility uses an online platform (i.e., GoToWebinar or GoToMeeting) to provide virtual instruction, facility staff may download and print daily attendance from the online software used to deliver virtual instruction.

Can CACFP providers allow parents or guardians to pick up meals?

Yes. Under the nationwide non-congregate feeding and parent pick-up waivers, a parent or guardian of an eligible child(ren) may pick up meals. The maximum number of meals that may be offered to each child remains the same as under regular CACFP operations. The state agency may approve a distribution or pick-up approach that includes meals for multiple days, up to one week at a time.

Can School Food Authorities (SFAs) distribute more than seven (7) days' worth of meals, at once, during extended school breaks, such as winter vacations?

Yes. SFAs that operate the CACFP At-Risk Afterschool Meals Program during school year 2020-2021, may offer additional meals during the holiday or school breaks. Program operators must ensure that they have submitted a <u>Combined Waiver Form</u> and meet the criteria outlined in question #18 of the <u>SP 13-2020</u> Child Nutrition Program Nationwide Waivers: Questions and Answers.

Is there a start date for the CACFP non-congregate feeding and the mealtimes waiver?

These waivers are currently in effect. Refer to the table/chart at the end of this FAQ document under *Additional Resources for Nutrition Programs* for details on all current waivers. These waivers are also posted on the DECAL website under <u>COVID-19 Resources</u>.

Do sponsoring organizations have to adhere to the monitoring requirements outlined in policy memo, *Monitoring Requirements* dated March 18, 2005, during the public health emergency?

Yes, the <u>Nationwide Waiver of Monitoring Requirements for Sponsors in the Child and Adult Care Food</u> <u>Program</u>, dated March 27, 2020 and the extension dated June 8, 2020 (COVID-19, Child Nutrition Response #27), expired on August 31, 2020; therefore, if the sponsor anticipates challenges with meeting the monitoring requirements for all facilities required per 7 CFR 226.16(d)(4)(iii) in FY 2021, the sponsor may submit an official waiver request to DECAL that will be submitted to USDA for consideration. Sponsors interested in submitting a waiver must review the DECAL Policy Memorandum, <u>Child Nutrition Program Waiver Request Guidance and Protocol (Revised)</u>, July 13, 2018 and respond to items #4, #5, #6 and #8 in a Word document. NOTE: Sponsors are also required to issue a notice informing the public that a waiver request has been submitted to DECAL. Submit the official waiver request and a copy of the public notice to <u>Sonja.Adams@decal.ga.gov</u>. A copy of the memorandum can be found <u>here</u>.

Also, DECAL has developed monitoring guidance to ensure the health and safety of sponsored staff and facilities can be maintained and to assist our CACFP sponsors in developing an alternate virtual monitoring process (desk review/audit) to ensure sponsors comply with monitoring requirements per USDA regulations 7 CFR 226.16(d)(4)(iii). A link to the documents is found below. The documents may also be found on the Nutrition page of DECAL's website under COVID-19 Resources>Resources.

- CACFP Sponsor Monitoring Guidance during COVID-19
- <u>Record Request Checklist Template</u>

Are state agencies and sponsoring organizations required to conduct pre-approval reviews for new CACFP centers and day care homes during the coronavirus pandemic?

Yes, to ensure program integrity during the public health emergency, state agencies and sponsoring

organizations are still required to conduct pre-approval reviews for new institutions and facilities. However, through authority established by the Families First Coronavirus Response Act (P.L. 116-127), FNS granted nationwide waivers of onsite monitoring requirements for state agencies and onsite monitoring of new facilities for sponsoring organizations. State agencies and sponsoring organizations that elect to use these waivers may conduct pre-approval reviews offsite through a desk audit. NOTE: Sponsoring organizations should record details to thoroughly document offsite monitoring, including but not limited to:

- The time and date the review was conducted
- Names and contact information of center or facility staff with whom the sponsoring organization interacted virtually
- Any technical assistance the sponsoring organization provided

DECAL has developed CACFP monitoring guidance to ensure the health and safety of sponsored staff and facilities can be maintained and to help CACFP sponsors develop an alternate virtual monitoring process (desk review/audit). A link to the documents is found below. The documents may also be found on the Nutrition page of DECAL's website under COVID-19 Resources>Resources.

- CACFP Sponsor Monitoring Guidance during COVID-19
- <u>Record Request Checklist Template</u>

If any of the required review elements cannot be fully completed with the required review timeframe, sponsoring organizations may request additional waivers of statute or program regulations to ensure compliance with oversight responsibilities. Sponsors interested in submitting a waiver should carefully review the instructions in DECAL Policy Memorandum, *Child Nutrition Program Waiver Request Guidance and Protocol (Revised)*, July 13, 2018. Sponsors are also required to issue a notice informing the public that a waiver request has been submitted to DECAL. Submit the official waiver request and a copy of the public notice to Leslie.Truman@decal.ga.gov. For more information on offsite monitoring strategies and documentation, refer to the *Sponsoring Organization Monitoring of the Child and Adult Care Food Program Federal Fiscal Year 2021* Fact Sheet.

Can current tier II family day care homes be moved to tier I with one month's worth of income during COVID-19, due to lower attendance or income, even if this does not reflect the yearly average? Can a tier I home's eligibility to claim their own child be re-determined during this time based on provider's income from the past month?

Yes. A tier II family day care home's eligibility for tier I reimbursement may be re-determined with one month's worth of income, even if this does not reflect the yearly average. A tier I family day care home's ability to claim their own child may also be re-determined based on the provider's income from the past month.

As child care centers/homes continue to open, they may have limited schedules and hours of operation. Can centers/homes provide a combination of congregate and non-congregate meals?

Yes. Under the nationwide waivers, child care centers/homes that remain open can provide congregate meal services to children in attendance and arrange for non-congregate meal service pick-up or delivery for the children who are not in attendance. For example, a center/home that is open only until 2:00 p.m. may serve breakfast and lunch to children in a congregate setting and then send the children home with an afternoon snack. The center/home must ensure that each child receives no more than one (1) of any type of meal each day. For example, a child may not receive a congregate and a non-congregate lunch

on the same day. The center/home must also ensure that is does not claim more than two (2) meals and one (1) snack per child, per day.

Will CACFP training sessions still be offered during this time?

Yes. Nutrition Services is currently offering all CACFP Orientation and Program Training sessions virtually. Contact Nutrition Services at 404-657-1779 to register for one (1) of the available virtual training sessions.

Do I have to adhere to CACFP monitoring requirements during this public health emergency?

With waiver approval, CACFP annual monitoring requirements are waived as follows:

- (1) Sponsors may conduct two reviews of their CACFP facilities;
- (2) Only one CACFP facility review is required to be unannounced;
- (3) FNS waives that at least one unannounced review must include observation of a meal service;
- (4) FNS waives the requirement that not more than six months may elapse between reviews; and
- (5) Allows sponsors to review new CACFP facilities as a desk audit.

Sponsors must contact <u>Leslie.Truman@decal.ga.gov</u> if they plan to utilize this waiver. **Waiver in effect through June 30.**

Should CACFP facilities that use pricing programs still charge families a meal fee if the facility is closed? What if a child is absent?

Meal fees for children enrolled in a CACFP participating facility should not be charged if the facility is closed due to the coronavirus outbreak. However, if the facility is open but the individual child is absent, the facility's existing meal policies should be followed. For additional information, contact <u>Sonja.Adams@decal.ga.gov.</u>

Do traditional CACFP program operators (institutions, sponsoring organizations, and centers) need to maintain daily attendance records?

Through authority granted under the COVID–19 Child Nutrition Response Act (the Act) (H.R. 6201, Title II), FNS waived the requirements to serve CACFP meals in a congregate setting in COVID–19: Child Nutrition Response #2, Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs, dated March 20, 2020.

For states that elect to use the non-congregate waiver authority, CACFP program operators only need to maintain daily attendance records for eligible children attending the center. For those not in daily attendance, state agencies must have a plan for ensuring that program operators can maintain accountability and program integrity. This includes implementing processes to ensure that meals are distributed only to parents or guardians of eligible children and that they do not distribute duplicate meals. This could be done by checking off participants picking up meals against enrollment records, using sign-in sheets, or other methods which result in accurate recording of eligible program participants, or their parents, receiving meals. CACFP program operators are still required to maintain daily meal counts and enrollment records under this authority.

Can CACFP sites that remain open implement the non-congregate and meal time nationwide waivers?

The nationwide waivers to allow meal service time flexibilities and non-congregate feeding in the Child Nutrition Programs during the coronavirus pandemic do not require that a CACFP site be closed. Under these waivers, day care homes and centers that are still open can provide meal service on site to participants in attendance. They can also arrange meal service pick-ups and/or provide meal delivery for

participants temporarily not in attendance. If the CACFP operator determines there is a need and it is logistically feasible to implement these options, it can do so for all or part of its participants. As indicated in SP 14-2020, Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3 (<u>https://www.fns.usda.gov/cn/covid-19/meal-service-during-novel-coronavirus-outbreaks-qas</u>), CACFP operators may provide meal delivery only to enrolled children and adult participants due to confidentiality and logistical requirements.

Can Head Start programs deliver meals to children enrolled in the home-based program option?

Head Start programs may distribute meals only to children who were already receiving meals through CACFP or the National School Lunch Program (NSLP). Under the non-congregate waiver, these meals can be provided through a state approved meal distribution method. Head Start children who do not normally receive meals under CACFP or NSLP, such as children in the Head Start/Early Head Start home-based program option, can use open SFSP or NSLP Seamless Summer Option (SSO) sites in their community to get meals. The USDA Meals for Kids Site Finder at https://www.fns.usda.gov/meals4kids can help Head Start families locate open meal sites.

Can CACFP state agencies and sponsoring organizations add new centers and facilities during the COVID-19 emergency?

Yes, state agencies and sponsoring organizations can add new centers and day care homes that are providing care during the coronavirus pandemic. However, state agencies and sponsoring organizations must complete all aspects of the application and approval process. It is up to each state agency or sponsor to determine if they have the capacity to add centers and facilities based on their systems and other resources, such as the availability of inspections and licensing.

What funding is available for meal delivery?

There is no additional reimbursement for home delivery or mobile meals delivery, but related expenses, such as postage or delivery service fees, would be considered an allowable cost under the CACFP. Delivery costs could also be paid with non-program funds such as state or local funds, or private donations.

What are the requirements for initiating home meal delivery for a household?

CACFP operators must first obtain written consent from households of enrolled children (including by email or other electronic means) that the household wants to receive delivered meals. CACFP operators should also confirm the household's current contact information to ensure meals are delivered to the correct location.

It is critical that CACFP operators protect the confidentiality of children and their households throughout this process. The National School Lunch Act and the Family Educational Rights and Privacy Act (FERPA) do not authorize release of household contact information for children without first obtaining the written consent of the child's parent or guardian. The CACFP operator must make the first contact about meal delivery with the households of enrolled children, and adult participants, and must notify them if contact information will be shared with an external organization, for example, a local non-profit that will provide meal delivery. Once the CACFP operator receives written consent from the parent or guardian to release contact information, the information may be shared with other organizations involved with meal delivery.

Do home-delivered meals need to be shelf stable?

No. The type of meal offered will depend on the resources and capacity of the program operator. Programs that can prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets state or local food safety requirements may do so.

Does the child or adult participant need to be present for home meal delivery?

No. If the CACFP operator has obtained the household's written consent to deliver meals and has verified the current address, the child or adult participant does not need to be present at the time of delivery. If the meals are shelf stable, no one needs to be present if the address has been verified. Consider state and local food safety requirements and best practices.

Because non-food items are allowable items through CACFP, can we provide such items to families who may need them in addition to food items?

CACFP requires that operational costs are limited to the institution's allowable expenses of serving meals to eligible participants in eligible child and adult care centers, except as provided in §226.18(a), sponsors of day care homes do not have allowable operating expenses.

Non-food supplies are an allowable operational cost, including those required for preparing and serving meals (e.g., plates, plastic forks, napkins, etc.) These items should be provided directly to program participants with the meals. Institutions should provide the number of non-food items needed for the number of meals provided.

Institutions must document the costs of these items with receipts and invoices.

My center shut down temporarily. Do I need to complete paperwork until we reopen?

If your center is closed, it is expected that you report that information to DECAL's licensing unit and email Leslie Truman, so Nutrition Services will have a record of it. If you are not serving meals, there are no CACFP records you would be expected to maintain for the time period in which the facility was closed.

We currently have an agreement with the school system to provide our food; however, since the schools are closed, the school system no longer has capacity to provide our meals. We currently serve supper. Is it possible that we could switch to a healthy snack?

Yes, you can switch from supper to a snack. Be sure to update your application to reflect the meal you are serving, so when you file your claim, the application in ATLAS matches your current operation.

We want to maximize our impact and serve more children or adults who need healthy meals. How can we serve more meals in our center or our community?

We recommend that you issue local media releases and use social media to announce that you are serving meals in your community. You can also use some of the flexibilities including distributing multiple meals at once, allowing parents/guardians to pick up meals, and serving meals in non-congregate settings. Additionally, you can deliver meals for children and adult participants with state agency approval.

When providing meals for the children, can we provide them with both lunch and breakfast items and account for those on the Meal Count Sheet as a breakfast and lunch item, or are we only focused on lunches at this time?

Yes, you can serve both lunch and breakfast. You will want to keep track of those meals separately, because they have different reimbursement rates and meal pattern requirements. We also encourage you to serve meal types – other than lunch – at this time.

How should milk be properly handled and distributed?

You must maintain milk at the appropriate temperature of 40 degrees or less. Additionally, you need to ensure you have appropriate holding facilities to keep the milk at the right temperature. If you are sending milk home, the easiest way to provide it is in individual servings.

When providing meals for families, how are we determining the income eligibility statement (IES) for the students receiving meals who are not directly associated with our school?

To claim a meal in CACFP, you must provide proof of enrollment for that child at your center. If you don't have an IES for a child, you will need a different method of enrollment, but you can still claim the meal. However, the reimbursement rate is based on whether the child qualifies for free or reduced-price meals. If you have a separate form of enrollment but don't have an IES for that child, you will be reimbursed at the paid rate which is a lower rate than the free and reduced rate.

Are we able to provide meals several days at a time?

Yes. If you are claiming the meals, make sure the meals meet the required meal components and quantities are being met.

Will we be able to use CACFP funds if we have to close?

CACFP organizations may only use CACFP funds to operate their meal service program. Funds are only to be used on allowable CACFP costs while meal service is in operation. The organization must have a process in place to utilize its non-CACFP funding sources in the event of a temporary or unexpected closure.

Will there be any changes to the processing of new CACFP applications?

There are no changes to the CACFP application process at this time. Organizations interested in the CACFP should contact Leslie Truman at <u>Leslie.Truman@decal.ga.gov</u> and visit the DECAL website at: <u>http://decal.ga.gov/CACFP/Applicant.aspx</u>.

Center A is a non-CACFP site and is closing temporarily due to low numbers. The children from Center A are going to Center B, which is a CACFP site. This is a temporary center that is under review until we get through this health crisis.

a. Do the children in Center A (non-CACFP site and is closing) need to enroll at Center B and do they need to fill out income eligibility forms?

If this is a traditional CACFP site, not at-risk afterschool, then the answer is Yes. Those children from Center A would have to enroll in Center B, and they must be present for the meal. Proof of enrollment for the children coming from Center A to B would be required. If the facility is using income eligibility forms as proof as enrollment, they would be required. If the center is using another type of document as an enrollment form, then an income eligibility statement would not be required. However, all meals served to those children who don't have an income eligibility statement would be reimbursed at the paid rate, which is a lower rate.

b. If the combined enrollment disqualifies Center B, can the two centers "live" together but document meals separately for Center B to continue to claim for their children?

No, two sites cannot operate at the same location. Contact your application specialist for additional guidance.

How can I serve children in my community who are school aged and are NOT enrolled in my center? If so, do I obtain an Income Form?

As a CACFP provider/institution, you can serve school age children during school closures, but you will need proof of enrollment for that child in order to claim them. Income eligibility forms are available on our website under CACFP forms.

Are there any mealtime restrictions specific to CACFP during the public health emergency? No. As of March 20, the USDA approved a nationwide waiver to allow flexibility in meal service time

No. As of March 20, the USDA approved a nationwide waiver to allow flexibility in meal service time requirements to support streamlined access to nutritious meals.

Will CACFP training sessions still be offered during this time?

Web-based training sessions housed in GA ATLAS are still available. All CACFP sessions conducted via webinar will still be offered, i.e., Memo Monday. To view past Memo Monday sessions, visit our <u>webpage</u>. At this time, all face-to-face CACFP sessions have been temporarily postponed. Notification emails regarding these trainings were sent to those registered. Our office will correspond via email when the training sessions are rescheduled.

Should CACFP facilities that use pricing programs still charge families a meal fee if the facility is closed? What if a child is absent?

Meal fees for children enrolled in a CACFP participating facility should not be charged if the facility is closed due to the coronavirus outbreak. However, if the facility is open but the individual child is absent, the facility's existing meal policies should be followed.

For additional information, contact sonja.adams@decal.ga.gov.

If a statewide mandate was issued requiring child care centers and homes to close, would the USDA provide financial relief or advancement to relieve the impact to sponsors?

At this time, DECAL is not aware of any plans for USDA to provide funding during times in which child care centers or homes are closed and not serving meals to children. If we receive additional information from USDA, we will provide this information to all institutions.

AT-RISK AFTERSCHOOL

Can an SFA that participates in both SSO and CACFP At-Risk provide meals and snacks through SSO and CACFP At-Risk to each participant? Do the programs have to be operated at the same site or different sites? Can participants pick up multiple meals at once?

An SFA, if approved to operate both programs, may locate them at the same or at different sites. The SFA may allow children to pick up multiple meals from each program at one time. However, the maximum number of meals that may be offered to each child may not exceed the number of meals allowed by each program. Under SSO, up to two meals or one meal and one snack, per child, per day, in any combination except lunch and supper, are allowed. Under CACFP At-Risk, up to one snack and one meal per child, per day are allowed. If the SFA is operating both programs at the same site and all the

meals for both programs are picked up at the same time, each program must keep accurate meal counts and claim only the meals served for that specific program.

DECAL may approve a plan that includes pick-up of meals for multiple days, up to one week at a time. DECAL will consider the expected duration of the school closure and the capacity of the sponsor to execute such an approach effectively, including meeting state or local food safety requirements.

May CACFP at-risk sites/sponsors that did not serve weekend meals prior to COVID-19 expand to provide weekend meals with a non-congregate enrichment activity?

Yes. Federal regulations at 7 CFR 226.17a(b) state that CACFP at-risk centers that provide care for children on weekends during the regular school year may claim meals served on weekends. However, in making decisions about whether a program should operate on weekends, at-risk sponsors, and at-risk centers are encouraged to tailor their operations to the needs of the community; DECAL will review program operations with this in mind. In addition, DECAL must ensure that CACFP at-risk centers serving weekend meals also provide weekend at-risk enrichment activities, either in person or virtually, on the weekend days for which meals are served. For example, if an at-risk center serves meals intended for consumption on Saturday, they must provide access to an enrichment activity on that Saturday.

How can CACFP at-risk centers track attendance to claim reimbursement for meals and snacks served to children participating virtually?

At-risk centers approved to participate under the COVID-19 waivers must continue to maintain attendance records, as required under 7 CFR 226.17a(o)(1). This includes daily attendance rosters, signin sheets, or with DECAL approval, other methods that result in accurate recording of daily attendance. When children participate virtually, flexibility in using other methods may be needed. DECAL may approve documentation of meal pick-up or meal delivery as a record of a child's attendance if it will result in accurate recording of daily attendance. DECAL may work with at-risk centers and sponsors to develop appropriate methods to document attendance and conform with the program's COVID-19 safety policies. For example, DECAL may accept the following methods for recording virtual daily attendance.

- 1. Child/Parent/Guardian documenting the child's first and last name on daily attendance sheets,
- 2. Meal pick-up and/or delivery records with child's first and last name,
- 3. Printed daily attendance sheets from an online platform used to provide virtual instruction (i.e., GoToWebinar or GoToMeeting), or
- 4. Staff documenting a child's first and last name on daily attendance sheets <u>if</u> no other option is available.

Note: Prior approval of methods to capture attendance is <u>not</u> required. However, program operators are responsible for implementing methods that result in accurate recording of daily attendance. This includes recording daily attendance separate from meal count records, recording daily attendance per child (an aggregate total of attendance for the day is <u>not</u> acceptable), and when delivering meals/snacks for multiple days, staff must maintain a record of participants (first and last name) that received a meal and/or snack. DECAL will ensure that program operators can maintain accountability and program integrity, including implementing processes to ensure that meals are provided for eligible children and duplicate meals are not distributed. Institutions may also use <u>DECAL's Monthly Attendance Record</u> to meet these requirements. For more information, reference the <u>Questions and Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations during School Year 2020-2021 – Q&A #4.</u>

Can the At-Risk Afterschool Meals Component of the CACFP operate simultaneously with SSO?

Yes. CACFP At-Risk, which operates during the regular school year, may operate simultaneously with the SSO during implementation of Child Nutrition Response #85, <u>Nationwide Waiver to Allow the Seamless</u> <u>Summer Option through School Year 2021-2022</u>. However, under no circumstance may children receive more than the number of reimbursable meals allowed in each program for which they are eligible. NOTE: CACFP At-Risk cannot operate when school is not in session.

For CACFP at-risk afterschool care programs that are providing on-site care to children attending school virtually due to COVID-19, what meals may be served?

Per federal regulations at 7 CFR 226.17a(m), when school is in session, a CACFP at-risk meal and/or snack must be served after the child's school day. Schools that are operating virtually for some of their students are considered to be in session; therefore, the afterschool program would need to plan their meal service around the time of the virtual school day. Only a meal and/or snack served after the virtual school day is over would be reimbursable.

FNS understands that programs caring for students attending school virtually would be in a position to serve meals during the school day. CACFP at-risk afterschool care programs can work with DECAL to explore operating CACFP as child care centers. Under regular CACFP, the program would have more flexibility in when a meal and/or snack could be served; however, only the maximum number of meals allowed under the program would be reimbursable.

May CACFP at-risk centers providing extended care during the day (both school hours and afterschool hours) claim reimbursement for a breakfast and/or lunch served in addition to the one meal and one snack allowed for at-risk?

No. Centers that are only approved to operate under the CACFP at-risk component may not claim reimbursement for meals that exceed their program meal limitation of one meal and one snack, per child, per day. CACFP child care centers that operate a separate daytime child care and at-risk afterschool program may be approved to claim reimbursement for up to two meals and one snack, or one meal and two snacks, per child, per day. This applies to children who attend just the daytime child care or attend both programs. For children that attend both programs, the center must ensure duplicate meals are not claimed. CACFP at-risk centers that wish to also operate a licensed child care program should contact DECAL for guidance.

Does ARP apply to At-Risk Afterschool Meals Programs operated by emergency shelters?

Yes, ARP allows participation of emergency shelters that are approved as at-risk centers and provide temporary housing or nonresidential services to young adults. Any public or private non-profit emergency shelter that meets the regulatory definition of emergency shelter under 7 CFR 226.2 is eligible to participate in CACFP. To qualify as an at-risk center, the emergency shelter must meet the requirements under 7 CFR 226.17(a)(b) to provide meals and snacks under a program that is organized primarily to provide care to at-risk school children during afterschool hours, weekends, or holidays during the regular school year; has organized regularly scheduled activities; and has an educational or enrichment purpose.

Are at-risk centers that contract with and are operated by for-profit companies eligible for CACFP?

No, 7 CFR 226.2 defines an at-risk center as a public or private non-profit organization. Although forprofit at-risk centers are allowed to participate in CACFP, only at-risk centers that are emergency shelters are eligible to participate under ARP.

Which types of at-risk centers are eligible to participate in CACFP under this provision of ARP?

Eligible at-risk centers must meet the regulatory definition of emergency shelter under 7 CFR 226.2 and qualify as an at-risk center under 7 CFR 226.17(a)(b). At-risk centers participating in CACFP must serve children, which may include persons age 18 and under and persons with disabilities, as defined as 7 CFR 226.2. Emergency shelters that operate as at-risk centers may provide services to other adults; however, only the meals and snacks served to young people under the age of 25 are eligible for reimbursement.

How can at-risk centers operated by emergency shelters participate in CACFP under ARP?

At-risk centers must have valid agreements with the state agency to participate and receive reimbursement. The emergency shelter must amend their current agreement or, if they are new to CACFP, apply and sign an agreement to operate the program. CACFP regulations at 7 CFR 226.11(a) allows payments to be made only to institutions operating under an agreement with the state agency and only for the meal types that are specified in the agreement and served at approved at-risk centers. However, 7 CFR 226.11(a) allows state agencies to establish policies that allow the reimbursement of eligible meals served in the calendar month preceding the calendar month in which the CACFP agreement is executed.

How does an at-risk center document that meals are served to eligible persons under ARP?

To support claims for reimbursement under ARP, at-risk centers must document meals that have been served to individuals under the age or 25 at the time of meal service. At a minimum, at-risk centers must maintain meal counts, daily attendance records, sign-in sheets, or with state agency approval, another method that accurately records daily attendance.

Which type of meals are at-risk centers allowed to claim?

At-risk centers must follow requirements under 7 CFR 226.17(a)(k) that allows only one [1] meal and one [1] snack to be claimed at the free rate.

Which meal pattern requirements apply to young adults under the age of 25 in an at-risk center?

At-risk centers must follow the meal pattern requirements for ages 13 through 18, under 7 CFR 226.20(c), when serving meals to young adults under the age of 25. Remember: The meal pattern establishes the minimum requirements for a meal or snack. Larger portions may be served to meet the nutritional needs of growing youths and young adults.

Is offer versus served a meal service option for at-risk centers?

Yes, offer versus serve is an option for at-risk centers in CACFP. At-risk centers that choose to use this option should follow the guidance outlined in the CACFP memo, <u>Offer Versus Serve and Family Style</u> <u>Meals in the Child and Adult Care Food Program</u> dated January 10, 2017.

Can at-risk centers receive retroactive reimbursement, under the ARP provision, for meals and snacks served to individuals under the age of 25, before FNS issued implementation guidance?

Yes, retroactive reimbursement back to March 11, 2021 is available to at-risk centers that have documentation to support the service of reimbursable meals and snacks to young adults under the age of 25.

How will retroactive reimbursements be processed under the ARP provision?

For at-risk centers that have already submitted a March 2021 claim for reimbursement to the state agency, a revised March 2021 claim may be submitted to the state agency to include the additional meals and snacks served to these newly eligible participants. For the purpose of ensuring timely adjustments, state agencies should promptly inform all participating at-risk centers that retroactive reimbursements are available effective March 11, 2021 for reimbursable meals and snacks served to young adults under the age of 25 who are experiencing homelessness.

Can at-risk centers that just submitted a CACFP application to their state agencies claim reimbursement for meals and snack served since March 11, 2021, before they were approved to participate in CACFP?

Yes, 7 CFR 226.11(a) allows state agencies to establish policies that allow reimbursement for eligible meals served in the calendar month preceding the calendar month in which the CACFP agreement is executed. However, the agreement must be executed before the at-risk center may receive program payment. New and existing CACFP emergency shelters must have meal service records that document meal counts, by type; demonstrate compliance with meal pattern requirements; and track food service revenues and expenditures to support claims for reimbursement.

Can the CACFP At-Risk Afterschool Meals Program continue to operate in 2021 after schools close for summer vacation. For example, if a school officially ends SY 2020-2021 on May 30, 2021, can the school continue to operate the CACFP At-Risk Afterschool Meals Program until June 30, 2021? No. The NSLA definition at Section 17(r)2(A) specifies that the CACFP At-Risk Afterschool Meals Program provides care to school children during afterschool hours, weekends, or holidays during the regular school year. Therefore, the program is able to operate only while school is in session. Unless an At-Risk Afterschool Meals Program is in the attendance area of a school operating on a year-round calendar, At-Risk Afterschool Meals may not be claimed during summer vacation [7 CFR 226.17a(m)(2)].

FNS understands that communities have been adversely impacted by the current public health emergency and appreciates state's efforts to assist by providing more meals to children. The Families First Coronavirus Response Act of 2020 (P.L. 116-127), as amended by the Continuing Appropriations Act, 2021 and Other Extension Act (P.L. 116-159) offers state agencies the opportunity to extend Pandemic EBT (P-EBT) benefits to households with eligible children through the summer.

During the public health emergency, are centers and/or sites participating in the At-Risk Afterschool Meals Component required to be located in the attendance area of a school in which at least 50% of the enrolled children are certified eligible for free or reduced-price school meals?

No. The newly released <u>Child Nutrition Response #93, Nationwide Waiver of Area Eligibility in the</u> <u>Afterschool Programs and for Family Day Care Home Providers in School 2021-2022</u> allows schools and at-risk afterschool care centers participating in the NSLP Afterschool Snack Service and the CACFP At-Risk Afterschool Meals Program to claim meals and snacks at the free rate, regardless of their location. This waiver also allows day care homes participating in the CACFP to claim all meals served to enrolled children at the tier 1 rate, regardless of their location.

Institutions and sponsors that would like to implement this waiver should notify your assigned Application Specialist or Business Operations Specialist. See the table below to determine your assigned Application/Business Operations Specialist.

**Reference the Waiver Chart under the Additional Resources for Nutrition Programs section to view all waiver effective dates. **

Institution Assignment	Application Specialists or Business Operations Specialist	Email	Phone Number
0 (zero)—G	Paula Lawrence	Paula.Lawrence@decal.ga.gov	(404) 463-2111
H—P	Shericka Blount	Shericka.Blount@decal.ga.gov	(404) 656-6411
Q—Z	Kenya Taylor	Kenya.Taylor@decal.ga.gov	(404) 463-4040

May CACFP at-risk afterschool care programs that are not caring for children onsite provide meals through alternate meal service options?

Yes. Under the nationwide non-congregate feeding and parent pick-up waivers, at-risk programs may provide meal deliveries and grab-and-go meals. Meal service times may also need to be waived. For more information regarding these waivers, select <u>Response #87</u>, <u>Response #88</u>, and <u>Response #89</u>. In all instances, some type of enrichment activity must be included, either virtually or in person, on the day(s) a meal and/or snack are intended for consumption. In addition, when a meal and/or snack are being provided for children that are not in care onsite, at-risk suppers and/or snacks may be distributed before the end of the school instructional day. For meal deliveries, the processes outlined in questions #9-13 of the <u>Child Nutrition Program Meal Service during Novel Coronavirus Outbreak: Questions and Answers #3</u> must be followed. **NOTE:** Meal deliveries would be limited to children who are enrolled in the at-risk afterschool care program. Therefore, the program would need to collect appropriate information to conduct and track deliveries.

Can my At Risk After School sites continue to serve meals now that the school year has ended?

Currently, CACFP At-Risk may operate only during the calendar school year. Once the state or school district transitions to traditional SFSP, At-Risk programs may <u>no</u> longer claim meals under the At-Risk Afterschool Meals Program but may choose to operate as SFSP sponsors or an SFSP site if eligible and approved by the state agency.

For CACFP at-risk afterschool programs, if the educational or enrichment activity is electronic and a child does not have access to the required electronic device, is the activity still considered available to all?

As program operators begin to plan enrichment activities for participating children, the state agency encourages operators to consider the ability of children to access various activities. It may be appropriate to offer some activities that children could participate in without Internet access or electronic devices, such as books, activity packets or coloring sheets. Team Nutrition offers a variety of games, books, and nutrition education activities for children on the <u>Digital Nutrition Resources for Kids</u> webpage. Although children are not required to participate in or complete an activity to receive an afterschool meal and/or snack, activities offered should include options that are accessible to all participating children.

During COVID-19, how may we offer the enrichment activity if we are operating in a non-congregate setting for social distancing and safety?

All At-Risk afterschool care providers, including those approved for non-congregate meals, still must meet the requirement to provide an education or enrichment activity [7 CFR 226.17a(b)(1)]. However, with approved non-congregate and parent pick-up waivers, these activities may be conducted virtually or in other non-congregate ways.

Program operators may use alternative methods to meet this requirement including but not limited to online homework assistance, activity packets, electronic games and books or other e-learning activities for the children to partake in at home. For example, Team Nutrition offers a variety of online games, books, and nutrition education activities for children at https://www.fns.usda.gov/tn/digital-nutrition-resources-kids. Although children are not required to participate in or complete the activity to receive an afterschool meal or snack, the afterschool care

provider must offer the activity.

Are educational or enrichment activities required for the At-Risk Afterschool Meal programs during the public health emergency?

Yes. The USDA nationwide waiver for offering enrichment or educational activities ended on June 30, 2020. Therefore, when the FY 2020-2021 school year begins, At-Risk Afterschool Meal programs must offer a program that includes regularly scheduled and planned educational and/or enrichment activities in a structured and supervised setting.

How can I apply to serve At Risk meals when the new school year begins?

When the new school year begins, sponsors can transition to the **At-Risk Afterschool Meals** component of the CACFP. Through the Afterschool Meals program, healthy meals and snacks can be served to children and teenagers who participate in afterschool programs in low income areas. CACFP is available to afterschool programs only during the school year when classes are in session.

Sponsors must hold a child care license or request an exemption from Child Care Services (CCS) before they can register for training. For more information about exemptions, visit: <u>http://decal.ga.gov/CCS/Exemptions.aspx</u>. Sponsors may contact Leslie Truman at <u>Leslie.Truman@decal.ga.gov</u> or at 404.657.1779 to register for training.

Can I claim reimbursement for meals served to children who did not typically attend my At-Risk afterschool program (e.g., siblings of enrolled children whose schools are closed due to coronavirus concerns)?

Yes, if the child is eligible to receive meals and all required records are maintained which include but are not limited to meal count records, attendance records, and menus. See CACFP Policy 18 at http://www.decal.ga.gov/documents/attachments/CACFPPolicy18.pdf for recordkeeping requirements. Additionally, institutions should ensure the ATLAS application reflects current operations including the current average daily attendance and the types of meals served.

SUMMER FOOD SERVICE PROGRAM (SFSP)

Does the nationwide waiver of area eligibility requirements apply to residential summer camps participating in the Summer Food Service Program (SFSP)?

No. Consistent with the policy for summer 2020, camps must continue to determine each child's individual eligibility for free and reduced-price meals using income eligibility forms or certification information from each child's school [7 CFR 225.14(d)]. Residential camps serve a specific and limited population. Families enroll their children and typically pay a fee to attend the camps. As part of the camp enrollment process, identifying low-income children and targeting assistance to them is more operationally feasible than in traditional open summer sites. Camps are reimbursed only for meals served to enrolled children who meet the federal free or reduced-price income eligibility guidelines.

What is the expectation for the SFSP sponsor review of sites within the first four weeks of operation? Sponsors must review food service operations at each SFSP site at least once during the first four weeks of program operations as required in the regulations at 7 CFR 225.15(d)(3). If the sponsor reviewed the site within the first four weeks of operations in FY 2020 and the site has continued to operate into FY 2021 without any break in operations, as currently allowed through <u>COVID-19 Child Nutrition Response</u> #59: Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option <u>Operations through School Year 2020-2021 – Extension</u>, the review is considered completed. However, DECAL recommends all sponsoring organizations conduct on-going quarterly monitoring reviews for all sites in operation in FY 2021 after the 1st and 4th week site visit/review. Click on the <u>FY 2021 SFSP</u> *Monitoring Guidance During COVID-19* for more information.

May state agencies make advance payments to SFSP sponsors prior to June 1st?

Yes. Section 13(e)(1) of the Richard B. Russell National School Lunch Act (NSLA) states that advance payments to SFSP sponsors should be provided "not later than June 1, July 15, and August 15 of each year," and the regulations found at 7 CFR 225.9(c) state that "State agencies shall make advance payments by June 1, July 15, and August 15." Therefore, there is no prohibition against making advance payments prior to June 1st when appropriate. However, while some advance payments may be made significantly earlier in the year than would typically be the case, all statutory and regulatory requirements continue to apply as they would under normal program operations and/or standard timelines. In particular, states must ensure that no advance program payments are made for any month in which a service institution will operate under the program for less than ten [10] days. Furthermore, the method for determining the advance payment amount remains that which is stipulated at NSLA sections 13(e)(2) and 7 CFR 225.9(c)(1)(ii).

How should the bonding requirement for Food Service Management Companies (FSMCs) in the SFSP be handled, when an SFA amends their existing FSMC contract to add SFSP?

Program regulations at 7 CFR 225.15(m)(5) require each FSMC that submits a bid for SFSP exceeding the simplified acquisition threshold (currently \$250,000) to obtain a bid bond in the amount between 5 and 10 percent, as determined by the sponsor, of the value of the contact for which the bid is made. Additionally, 7 CFR 225.15(m)(6) requires every FSMC that enters into a food service contract for SFSP exceeding the small purchase threshold to obtain a performance bond between 10 and 25 percent of the value of the contract, as determined by the state agency.

Similar requirements for bid and performance bonding do not exist for NSLP. If an SFA adds SFSP to their FSMC contract, a performance bond is required. The SFA should use the value of the contact that applies to SFSP to determine if it exceeds the small purchase threshold, and the bond percentage (between 10 percent to 25 percent) should apply to the SFSP portion. If the FSMC enters into more than one contact with any one sponsor, the FSMC is required to obtain a performance bond covering the SFSP portion of

all contracts if the aggregate amount of the SFSP portion of those contracts exceed the simplified acquisition threshold.

Contract modifications are subject to a cost or price analysis found in 2 CFR 200.323(a). The non-federal entity must perform a cost or price analysis in connection with every procurement action in excess of the simplified acquisition threshold including contract modifications. Once the cost or price analysis is obtained, the SFA or state agency legal counsel may determine if the change is material. State agency review and approval of such amendments is required prior to execution.

Will there be any changes to the SFSP application process for experienced SFSP sponsors returning to operate in FY 2021 but did not operate in FY 2020 due to COVID-19?

Yes. Food and Nutrition Service (FNS) allows state agencies to use the streamlined experienced sponsor application and approval process for returning sponsors who successfully participated in the SFSP in FY 2019 but did not operate in FY 2020 due to COVID-19. Reference <u>COVID-19: Child Nutrition Response</u> #83 for more information.

On the last day before expiration of the waiver to allow non-congregate feeding, can an SFSP sponsor serve multiple meals that would extend beyond the expiration of the waiver? For example, on September 30, 2021 can the sponsor deliver meals that are intended to be consumed on October 1-4, 2021?

The state agency would not be able to approve a distribution approach that includes a sponsor claiming non-congregate meals intended for consumption after September 30, 2021 or after the duration of summer operations, whichever is earlier: <u>Child Nutrition Response #75 Nationwide Waiver to Allow Non-congregate Feeding for Summer 2021 Operations – Extension 6, March 9, 2021 (SFSP)</u>.

Can closed enrolled sites use area eligibility instead of collecting income eligibility statements?

Yes, the closed-enrolled eligibility waiver allows sponsors to use area eligibility instead of collecting income eligibility statements. However, camps are not closed enrolled sites. They cannot use area eligibility in lieu of collecting income eligibility statements. Camps are required to collect income eligibility statements, and meals are reimbursed only for children who qualify for free and reduced priced meals. **Reference the Waiver Chart at the end of this FAQ document to view all waiver effective dates. The chart is under the Additional Resources for Nutrition Programs section.**

Does the First Week Site Visit Waiver allow sponsors to forego the full review of site operations at each site within the first four weeks of operations?

SFSP sponsors are required to visit their sites within the first week of operation and complete a full review of the first four weeks of operation. With waiver approval, SFSP sponsors are not required to visit sites within the first week of operation if the site operated successfully in the previous year and if sponsors successfully participate in the CACFP or the NSLP. The four-week review is still required, but sponsors do have the flexibility to conduct the review via desk audit.

Reference the Waiver Chart at the end of this FAQ document to view all waiver effective dates. The chart is under the *Additional Resources for Nutrition Programs* section.

Has DECAL submitted other waiver requests to USDA FNS for the SFSP?

DECAL issued three (3) additional waiver requests to the USDA FNS Southeast Regional Office (SERO) for the SFSP. In the waivers, DECAL requested continued use of the following:

- (1) Area Eligibility in Closed Enrolled Sites (7 CFR 225.15(f)) *
- (2) Meal Service Times (7 CFR 225.16(c)) (Approved by USDA)

(3) First Week Site Visits (7 CFR 225.15(d)(2)) (Approved by USDA)

*However, USDA has released the Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option. <u>Click here</u> to access the waiver.

I am a SFSP sponsor. Do I have to adhere to monitoring requirements during the public health emergency?

Yes, the <u>Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the</u> <u>Summer Food Service Program-Extension 2</u> (COVID-19, Child Nutrition Response #42), dated August 4, 2020, specifically allows for offsite monitoring via desk review/audit through September 30, 2021 to SFSP sponsors who have requested this waiver and received approval from DECAL. To ensure program integrity during this time, sponsoring organizations should, to the maximum extent practicable, continue monitoring activities of program operations offsite (e.g., through a desk audit).

This waiver allows for offsite monitoring and is effective immediately and remains in effect through September 30, 2021. **NOTE:** Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any <u>new</u> requests for waivers must be completed through an online Waiver Participation Form in the new **USDA Waivers Module** in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under <u>COVID-19 Resources</u>; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the <u>Training and Technical Assistance webpage</u>, and the <u>GA</u> <u>ATLAS Waiver Guide</u> can be found under <u>COVID-19 Resources</u> in the *Nutrition Waivers – Waiver Request Forms* section. **NOTE:** If you have already submitted and have been approved to utilize a waiver, you do not have to submit the request again.

For general questions about the waiver, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA mailbox at <u>NutritionTA@decal.ga.gov</u>.

DECAL has developed SFSP monitoring guidance to ensure the health and safety of sponsored staff and sites can be maintained and to help SFSP sponsors develop an alternate virtual monitoring process (desk review/audit) to ensure sponsors are in compliance with monitoring requirements per USDA regulations during the public health emergency. Also, this guidance provides additional direction regarding on-going site monitoring after the first-and fourth-week visit/review. **Effective January 4, 2021**, DECAL recommends that, in addition to the first-and fourth-week visit/review, all sponsoring organizations conduct on-going quarterly monitoring reviews for all sites in operation during FY 2021. A link to the documents can be found below. The documents may also be found on the Nutrition page of DECAL's website under COVID-19 Resources>Resources.

- SFSP Sponsor Monitoring Guidance during COVID-19
- <u>Record Request Checklist Template</u>

If a Summer Food Service Program (SFSP) sponsor would like to implement home meal delivery, what site type must be selected in the Site Application?

Summer Food Service Program (SFSP) sponsors may implement home meal delivery for all site types. Sponsors must ensure that all eligibility requirements are met for the site type selected. Therefore, sponsors should select the appropriate response that describes the site type (for each site) in the online Site Application. Sponsors must also attest to required information listed in the <u>Combined Waiver</u> <u>Request Form</u> for home meal delivery.

- Written consent from households of eligible children and/or adult participants that the household wants to receive delivered meals
- The number of children/adults being served
- The household's current contact information (address)

Sponsors are required to submit and upload the household's current contact information into GA ATLAS *Attachment List* section via a list or an Excel spreadsheet. The documentation must also be maintained on file and made available upon review. NOTE: Sponsors are required to notify households that their contact information will be shared with DECAL. Additionally, if a household does not want to share their contact information with DECAL, then the home delivery household/address would not be eligible for reimbursement. In that case, refer the household to a non-congregate (grab and go) meal site in their area. Ensure that the households you serve are aware of safeguard measures that your organization has in place to preserve their confidentiality. For more information on other requirements for meal delivery click on *Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meal Delivery Using Existing Authority, Questions and Answers*.

How do you calculate the Average Daily Attendance (ADA) in the Site Application when delivering more than one (1) day worth of meals *only* once a week?

The average daily attendance (ADA) should be based on the average number of meals for <u>one (1) day</u>. For example, if a sponsor *typically* distributes 1,000 meals every Thursday for five (5) days' worth of meals, that will equal 200 meals per day (*1,000 divided by 5 = 200*]. The sponsor must also determine and enter the number of days meals will be served for the month. If the sponsor is delivering every Thursday in January (four Thursdays in January), then the number of day meals served for the month should reflect 20 (*5 days' of meals multiplied by 4 Thursdays = 20*).

Can SFSP sponsors claim meals prior to their approval?

Yes. On September 11, 2020, FNS issued a nationwide waiver to allow state agencies to reimburse Summer Food Service Program (SFSP) sponsors for meals served before the sponsor was notified that the sponsor or site was approved to participate in the program. Click on <u>Response #57</u> to access the waiver. Sponsors who would like to use this waiver must update their FY 2021 SFSP Site Application(s) in GA ATLAS to reflect changes (e.g., new operating dates, meal times). Once changes are made, sponsors must complete the <u>SFSP Site Update Form, Attachment Q</u> and send the completed form to their assigned Business Operations Specialist. NOTE: Sponsors are eligible for reimbursement only for meals actually served. Supporting documentation for all meals served must be maintained on file.

Are children allowed to take SFSP meals offsite for other people such as: brothers, sisters, or parents? Can a child take home more than one (1) breakfast, lunch, or snack each day and all these meals be claimed as first meals?

Children are <u>not</u> allowed to take meals offsite for other people, even siblings, to consume. In addition, parents/guardians may pick-up meals or snacks for their own children **only** and <u>not</u> for other children, parents, or neighbors. However, program operators participating under the nationwide meal service time and non-congregate feeding waivers may allow children to pick-up multiple meals at one time or

for more than one (1) day. Each set of multiple meals (such as meals for two [2] days) is for consumption by one (1) child and is claimed as first meals. The maximum number of meals that may be served to each child, each day, and claimed for federal reimbursement under 7 CFR 225.16(b) has not changed.

My FSMC contract is set to expire around the start of SFSP FY 2021, and I do not have any available renewals. Can I take advantage of the FSMC waiver by executing a one-year noncompetitive contract? Yes. If your contract is set to expire for SFSP FY 2021 (by or around June 30, 2021) and you do not have any available renewals, you may use emergency noncompetitive procurement to extend your current contract for one additional year or proceed with a new one-year emergency noncompetitive contract.

NOTE: The emergency noncompetitive contract is only valid for one year, through June 30, 2022 with no options to renew. In addition, the use of this waiver is available until June 30, 2021 or until the expiration of the federally declared public health emergency. To use this waiver, complete the <u>Combined Waiver Request Form</u> and select the "FSMC Waiver (Vended Meals Only)" waiver option. Send your request to <u>Leslie.Truman@decal.ga.gov</u>. If you have any questions, contact LaMonika Jones, Procurement and Purchasing Compliance Officer at (404) 656-2472 or <u>LaMonika.Jones@decal.ga.gov</u>. You may also reference the <u>Nationwide Waiver of Food Service Management Contract Duration in the</u> National School Lunch Program and Summer Food Service Program Extension.

Can a School Food Authority (SFA), operating an open SFSP site with non-congregate meal service, serve meals to children not enrolled in the school, such as preschoolers?

Yes. In 7 CFR 225.2, an open site is defined as one located in an eligible area and makes meals available to *all* children in the area in which the site is located. The SFA may serve those meals on a first-come, first-serve basis, as described in *Summer Food Service Program Questions and Answers*, dated January 10, 2017. If an SFA determines it can offer meals to enrolled children and non-enrolled children, an open site is the appropriate meal distribution approach. If an SFA only has the capacity to serve enrolled children, a closed enrolled site is the appropriate choice. NOTE: Open sites may be approved to operate outside eligible areas under COVID-19 *Nationwide Waiver to Extend Area Eligibility Waivers* - EXTENSION <u>2</u>.

For SFSP sites that will be able to serve congregate meals to a limited number of participants under COVID-19 restrictions, will they also be able to serve non-congregate meals to the remainder of participants?

The nationwide waivers to allow meal service time flexibilities and non-congregate feeding in the Child Nutrition Programs during the coronavirus pandemic do not prohibit the service of congregate meals onsite. Under these waivers, SFSP sites can provide meal service onsite to participants in attendance. They can also arrange meal service pick-ups and/or provide meal delivery for participants who cannot remain onsite due to group restrictions related to COVID-19. If the program operator or site determines there is a need, and it is logistically feasible to implement these options, it can do so for all or part of its participants. NOTE: For meal delivery service, SFSP sponsors must follow guidelines outlined in the *Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meal Delivery Using Existing Authority*.

Can residential child care institutions (RCCIs) operate SFSP under the <u>Nationwide Waiver to Allow</u> <u>Summer Food Service Program and Seamless Summer Option Operations through School Year 2020-</u> 2021?

Yes. School Food Authorities (SFAs) operating RCCIs are permitted to operate SFSP under the *Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations* <u>through School Year 2020-2021</u> to safely serve nutritious meals during COVID-19. Similarly, RCCIs may benefit from the additional flexibilities provided by SFSP during COVID-19.

RCCIs meet the definition of a school [42 USC § 1760(d)(5), 7 CFR 210.2 (School)] and public or nonprofit private SFAs are eligible to sponsor SFSP/SSO (7 CFR 225.14 (b)(1)). Additionally, the <u>Nationwide Waiver</u> to Allow Summer Food Service Program and Seamless Summer Option Operations through School Year 2020-2021 states that SFAs may choose to serve meals through the SFSP or SSO, or may opt to participate under the School Meals Programs. Therefore, the <u>Nationwide Waiver to Allow Summer Food</u> Service Program and Seamless Summer Option Operations through School Year 2020-2021 may apply to SFAs responsible for meal service at an RCCI.

SFAs providing meal service at RCCIs were not explicitly authorized to operate the SFSP/SSO under the flexibilities offered during school year (SY) 2019-2020; because, due to their residential nature, RCCIs were able to continue to serve children onsite. The flexibility was offered to traditional schools due to disruptions in onsite instructions. During SY 2019-2020, SFAs were able to participate in SFSP because the school closures were considered an unanticipated school closure. Because RCCIs were not closed, but continued to provide meals to children housed onsite, they were not considered *operating* under an unanticipated school closure. However, for SY 2020-2021, FNS is extending the summer program due to COVID-19, this allows all SFAs to consider operating the SFSP or SSO.

Can SFSP sponsors continue serving children after September 30, 2020 during the public health emergency? If so, what are the requirements?

SFSP sponsors currently approved to serve meals under traditional SFSP are permitted to extend their operations until June 30, 2021. Sponsors who wish to continue serving meals through December 31, 2020 only must complete the requirements listed in the instructions for <u>Extending SFSP Operations</u> <u>through December 31, 2020</u>. However, sponsors who wish to continue serving meals through June 30, 2021 must also complete the requirements listed in the instructions for <u>Extending SFSP Operations</u> through June 30, 2021 that were disseminated via email to SFSP sponsors. Reference the <u>Nationwide</u> <u>Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through School Year 2020-2021- Extension</u>.

Can the At-Risk Afterschool Meals Component of the CACFP operate simultaneously with the SFSP/SSO?

Yes. The At-Risk Afterschool Meals Component of the CACFP, which operates during the regular school year, may operate simultaneously with the SFSP/SSO. However, the maximum number of meal(s) and/or snack(s) allowed for each Child Nutrition Program (e.g., SFSP; CACFP; SSO; NSLP) cannot be exceeded.

Can a School Food Authority (SFA) serve meals through the NSLP and/or SBP between the beginning of the school year 2020-2021 through June 30, 2021 and claim those meals under SFSP?

Yes, if an SFA is approved to extend summer operations under waiver <u>Response 59</u>, meals served in the NSLP and SBP through the school year 2020-2021 may be claimed under the SFSP. In addition, reimbursement for these meals may be claimed at the free rate. However, any student who paid for their meals must receive a refund for their meal payments.

Can a School Food Authority (SFA), approved to serve meals until June 30, 2021 under waiver <u>Response 59</u> serve meals on the weekends and serve children up to 18 years of age, regardless of whether the children are enrolled in the SFA?

Approved open sites must serve all children who request a meal from those sites. SFAs may elect to operate closed enrolled sites that serve only enrolled students. All SFSP sponsors are encouraged to tailor their operations to the needs of the community. Pursuant to SFSP regulations, meals may be offered on weekends and holidays. Note: the continuation of waiver <u>Response #59</u>, <u>Nationwide Waiver</u> to Allow Summer Food Service Program and Seamless Summer Option Operations through School Year 2020-20 2- Extension is contingent on the availability of funds.

Can SFSP sponsors claim meals prior to their approval?

Yes. On September 11, 2020, FNS issued a nationwide waiver to allow state agencies to reimburse Summer Food Service Program (SFSP) sponsors for meals served prior to the sponsor receiving notification that the sponsor or site was approved for participation in the program. <u>Click here</u> to access the notification. Sponsors who would like to utilize this waiver must update their FY 2020 SFSP site application(s) in GA ATLAS to reflect changes (e.g., new operating dates, mealtimes). Once changes are made, sponsors must complete Attachment Q–Sponsor Update Form, and send the completed form to their assigned Business Operations Specialist. <u>Click here</u> to access Attachment Q–Sponsor Update Form. **Note:** Sponsors are only eligible for reimbursement for meals actually served. Supporting documentation for all meals served must be maintained on file.

When distributing multiple meals for the entire week, can we distribute a half-gallon or a larger container of milk instead of multiple 8-fluid ounces (fl. oz.) cartons of milk?

Please reference the <u>Summer Food Service Program: Providing Multiple Meals at a Time During the</u> <u>Coronavirus (COVID-19) Pandemic</u> resource document located on our website under the COVID-19 Resources section. The document states that, "Under state-approved non-congregate feeding and mealtime waivers, program operators may provide bulk food items that contribute to multiple meals for children. Program operators can provide menus and instructions with the foods to communicate to children and their parents or guardians how to portion and serve foods at mealtime. For example, the program operator could provide a half-gallon of milk, instead of multiple 8-fluid ounces (fl. oz.) cartons of milk, along with a menu showing that an 8 fl. oz. (1 cup) serving of milk is part of each breakfast and lunch meal." Therefore, providing milk in larger containers would be acceptable if approved for a noncongregate and mealtime waiver. Documentation must be maintained that shows the total amount of milk needed for the number of meals served was purchased and available.

On the last day before expiration of the waiver to allow non-congregate feeding, can an SFSP sponsor serve multiple meals that would extend beyond the expiration of the waiver? For example, on December 31, 2020 can the sponsor deliver meals that are intended to be consumed on January 1-4? The state agency would not be able to approve a distribution approach that includes a sponsor claiming non-congregate meals intended for consumption after December 31, 2020 or after the duration of summer operations, whichever is earlier, the date that *COVID-19: Child Nutrition Response #22 Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs – EXTENSION* expires.

Can closed enrolled sites use area eligibility instead of collecting income eligibility statements?

Yes, the closed-enrolled eligibility waiver allows sponsors to use area eligibility instead of collecting income eligibility statements. This waiver is in effect until December 31, 2020. However, camps are not

closed enrolled sites. They cannot use area eligibility in lieu of collecting income eligibility statements. Camps are required to collect income eligibility statements, and meals are reimbursed only for children who qualify for free and reduced priced meals.

Can SFSP sponsors continue serving children after September 30, 2020 during the public health emergency? If so, what are the requirements?

SFSP sponsors currently approved to serve meals under traditional SFSP are permitted to extend their operations until December 31, 2020. Sponsors who wish to continue serving meals through December 31, 2020 must complete the requirements listed in the *Instructions for Extending SFSP Operations through December 31, 2020*. The instructions can be found <u>here</u>. Also reference the newly released USDA <u>Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option</u> <u>Operations through December 31, 2020</u>.

Which Child Nutrition Programs may school food authorities (SFAs) and sponsors operate during the waiver period?

SFAs may operate the National School Lunch Program (NSLP) and the School Breakfast Program (SBP), the Seamless Summer Option (SSO) and/or the Summer Food Service Program. SFSP sponsors who are <u>not</u> SFAs may operate the SFSP. All sponsors may also operate the At-Risk Afterschool Meals Component of the CACFP concurrently with the SFSP.

Can the At-Risk Afterschool Meals Component of the CACFP operate simultaneously with the SFSP/SSO?

Yes. The At-Risk Afterschool Meals Component of the CACFP, which operates during the regular school year, may operate simultaneously with the SFSP/SSO. However, the maximum number of meal(s) and/or snack(s) allowed for each Child Nutrition Program (e.g., SFSP; CACFP; SSO; NSLP) cannot exceed two (2) meals and one (1) snack or one (1) meal and two (2) snacks per child, per day. Sponsors who wish to continue serving meals through December 31, 2020 must complete the requirements listed in the *Instructions for Extending SFSP Operations through December 31, 2020.* The instructions can be found here. Also reference the newly released USDA *Questions and Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020.*

May SFSP sponsors amend their applications to reflect continuation of operations through December

31, 2020? Or should they submit a new application to determine which sites can operate SFSP? The state agency has discretion regarding the process used to extend SFSP applications. SFSP sponsors currently approved to serve meals under traditional SFSP are permitted to extend their operations until December 31, 2020. Sponsors who wish to continue serving meals through December 31, 2020 must complete the requirements listed in the *Instructions for Extending SFSP Operations through December 31, 2020.* The instructions can be found here. Also reference the *Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 31, 2020.*

Can a School Food Authority (SFA) serve meals through the NSLP and/or SBP between the beginning of the school year 2020-2021 through December 31, 2020 and claim those meals under SFSP?

Yes, if an SFA is approved to extend summer operations under waiver <u>Response #56</u>, meals served in the NSLP and SBP from the beginning of the school year 2020-2021 until December 31, 2020 may be claimed under the SFSP. In addition, reimbursement for these meals may be claimed at the free rate. However, any student who paid for their meals must receive a refund for their meal payments.

Can a School Food Authority (SFA), approved to serve meals until December 31, 2020 under waiver <u>Response #56</u>, serve meals on the weekends and serve children up to 18 years of age, regardless of whether the children are enrolled in the SFA?

Approved open sites must serve all children who request a meal from those sites. SFAs may elect to operate closed enrolled sites that serve only enrolled students. All SFSP sponsors are encouraged to tailor their operations to the needs of the community. Pursuant to SFSP regulations, meals may be offered on weekends and holidays. Note: the continuation of waiver Response #56, <u>Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 31, 2020</u> is contingent on the availability of funds.

May a state agency approve a school food authority (SFA) to operate SFSP/SSO at some schools and NSLP/SBP at other schools?

There is no federal requirement that an SFA can only be approved to operate one (1) Child Nutrition Program in all schools with the SFA. State agencies may approve SFAs to operate different Child Nutrition Programs based on the needs of each school. FNS strongly encourages state agencies and SFAs to provide the flexibility needed to meet varying school circumstances. State agencies may choose <u>not</u> to approve SFAs to operate different Child Nutrition Programs at their individual schools if operational impediments exist that would prevent them from effectively managing such arrangements.

On the last day before expiration of the waiver to allow non-congregate feeding, can a SFSP sponsor serve multiple meals that would extend beyond the expiration of the waiver? For example, on September 30, can the sponsor deliver meals that are intended to be consumed on October 1-4? The State agency would not be able to approve a distribution approach that includes a sponsor claiming non-congregate meals intended for consumption after September 30, 2020 or after the duration of summer operations, whichever is earlier, the date that *COVID-19: Child Nutrition Response #22 Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs – EXTENSION* expires.

Can closed enrolled sites use area eligibility instead of collecting income eligibility statements?

Yes, the closed-enrolled eligibility waiver allows sponsors to use area eligibility instead of collecting income eligibility statements. This waiver is in effect until September 30, 2020. However, camps are not closed enrolled sites. They cannot use area eligibility in lieu of collecting income eligibility statements. Camps are required to collect income eligibility statements, and meals are only reimbursed for children who qualify for free and reduced priced meals.

The executive order issued by Governor Kemp allows child care facilities to increase the number of people allowed in a single classroom from 25 to 50. Does that requirement also apply to SFSP sites? Unless six feet of distance can be maintained at all times, according to the executive order effective June 11, 2020, SFSP meal sites may operate in groups up to 50 including staff.

How can I operate a feeding site that complies with the Governor and local executive orders regarding social distancing?

Below are suggestions that may comply with the Governor's executive order effective June 11, 2020 to allow gatherings up to 50 individuals unless six feet of distance is always maintained. However, sponsors and sites should ensure they review and comply with any local orders that may be in place.

Organizations are solely responsible for interpreting all orders to ensure you can operate and are not violating any jurisdiction's requirements. DECAL offers limited guidance below; however, DECAL's interpretations are the department's alone and shall not be used as the only criteria to determine if a program should maintain or cease operations.

- Allow the children to walk up to the food counter one at a time
- Utilize the non-congregate waiver, and let the children pick up a meal and take it home
- Allow the children and their parent/guardians to enter the building and pick up meals in groups of 50 or less
- Limit number of staff working in the kitchen at the same time
- Clean surfaces that are frequently touched including shared countertops, kitchen areas, and doorknobs

If an SFA or SFSP sponsor with an FSMC contract is closed and not serving meals, can the FSMC continue to charge maintenance fees?

Maintenance fees, using a 'meals x rate' price, are not eligible for payment when program meals are not served. Other maintenance fee payment provisions that may exist are subject to state or local legal counsel review and feedback for compliance with federal, state, and local procurement standards.

If an SFA and SFSP sponsor would like a change to meal service (e.g., begin weekend meal service) which is not captured in an existing FSMC contract, is this a material change to an FSMC?

Contract modifications are subject to a cost or price analysis found in 2 CFR 200.323(a). The non-federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. Once the cost or price analysis is obtained, the SFA or state agency legal counsel may determine if the change is material. State agency review and approval of such amendments is required prior to execution. 7 CFR 210.19(a)(5)

Alternatively, during COVID-19 operations, SFAs and SFSP sponsors may also use the micro-purchase method in 2 CFR 200.320(a) or non-competitive proposals as explained in 2 CFR 200.320(f)(2) to obtain the additional goods and services needed to offer weekend meal services. When using the micro-purchase method, SFAs and SFSP sponsors are reminded that while price quotes are not required, prices must be reasonable and purchases equitably distributed among qualified suppliers. To ensure program integrity moving forward, contracts resulting from non-competitive proposals may not exercise renewal options. All costs must be necessary, reasonable, and allocable to be paid using federal funds (2 CFR 200.403).

SFAs and SFSP sponsors with FSMC contracts are having to purchase different items to accommodate grab and go. For the contracts that are fixed-priced, should the cost of the paper products be included, or should they bill the school or sponsor for those additional products?

Billing of additional costs depends on what costs are included in the existing fixed-price contract. Additional costs amending an SFA-FSMC contract in excess of the Simplified Acquisition Threshold will be subject to 2 CFR 200.323(a), which requires a cost or price analysis in excess of the Simplified Acquisition Threshold, and 7 CFR 210.19(a)(5), which requires state agency review and approval of amendments prior to execution [7 CFR 210.19(a)(5)].

During the COVID-19 operations, SFAs and SFSP sponsors may use the micro-purchase method in 2 CFR 200.320(a) or a non-competitive proposal as explained in 2 CFR 200.320(f)(2) to obtain the additional goods. SFAs and SFSP sponsors may obtain additional services using these same procurement methods if

applicable. To ensure program integrity moving forward, contracts resulting from non-competitive proposals may not exercise renewal options. All costs must be necessary, reasonable, and allocable to be paid using federal funds (2 CFR 200.403). When using the micro-purchase method, SFAs and SFSP sponsors are reminded that while price quotes are not required, prices must be reasonable and purchases equitably distributed among qualified suppliers. Amending contracts executed using non-competitive proposals in 2 CFR 200.320(f)(2) must follow 2 CFR 200.323(a) as applicable, and as noted above, obtain state agency prior review and approval prior to execution.

Can SFAs or SFSP sponsors extend contracts with food distributors and milk, dairy, and other suppliers with contract duration periods ending on or around June 30, 2020?

Program operators seeking to extend supplier contracts expiring on or before June 30, 2020, will need to consult state and local procurement standards to determine if contract extensions are allowable. If contracts expire, however, federal regulations allow program operators to use a non-competitive proposal in 2 CFR 200.320(f)(2) to negotiate one-year contracts given the public health emergency.

For SFAs and non-SFA (community organization) sponsors serving non-congregate meals via home meal delivery models that utilize bus routes or mobile meal routes, should each stop be considered a SFSP site? Do they have to adhere to site requirements for a mobile meal service?

No. When performing home delivery of SFSP meals for a COVID-19 food service, even though the meals may be delivered via a school bus route or a mobile meal route normally used for SFSP congregate meal service in the summer months, each home would not be considered a site. Therefore, the SFSP site requirements, including site approval by the state agency, do not apply. Instead, the SFSP sponsor should ensure that the operation adheres to requirements for home meal delivery in *COVID-19 SFSP and Seamless Summer Option Meal Delivery Using Existing Authority*, March 9, 2020. For more information, click here.

Do the other nationwide waivers continue to apply once the transition is made to traditional SFSP/SSO?

Yes. The policy flexibilities offered by the collective nationwide waivers for COVID-19 operations continue to apply after program operators transition to traditional SFSP or SSO operations. FNS will continue to assess conditions and will consider extending the nationwide waivers if the need for policy flexibilities continues.

Can schools that have been approved for non-congregate feeding through SFSP or SSO deliver meals directly to students' homes? Also, may SFSP sponsors who are not school food authorities (SFAs) also serve non-congregate meals via meal delivery?

Yes. SFSP sponsors and School Food Authorities (SFAs) may serve non-congregate meals via meal delivery. If an SFA and SFSP sponsor determines there is a need, and it is logistically feasible to deliver meals directly to homes, it may do so with state agency approval, adherence to all federal confidentiality requirements, and with all necessary federal waiver approvals (including an approval for non-congregate feeding). Delivery could be accomplished by mail or delivery service, or hand delivered by school staff, volunteers, community organizations, or others.

Sponsors who are not working in coordination with an SFA will not have access to school rosters of eligible children. For that reason, these sponsors must develop a method of notifying households in an area-eligible community that SFSP meals are available to all children who request them. These sponsors must also develop a method for households to provide written consent to initiate meal delivery, to

confirm the household's current contact information and delivery location, and to confirm the number of children in the household who need meals. Households also must have a way of notifying the sponsor of the need for individual substitutions due to medical or other special dietary needs.

All other requirements for meal delivery in *COVID-19 Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meal Delivery Using Existing Authority, Questions and Answers* apply. For complete information, <u>click here</u>.

Will SFSP training sessions still be offered during this time?

Web-based training sessions housed in GA ATLAS are still available. All SFSP sessions conducted via webinar will still be offered, i.e., Memo Monday, Procurement Readiness, Budget Readiness, SFSP, and Recordkeeping 101. To view past Memo Monday sessions, visit our <u>webpage</u>. All SFSP Orientation and Program Training sessions have been conducted for FY 2020.

Are new SFSP sponsors allowed to utilize waivers in the SFSP?

Once a new sponsor's full application has been approved, they are eligible to utilize the waivers after the sponsor receives waiver approval from DECAL.

What is a noncompetitive procurement?

Noncompetitive procurement is a contract awarded without any competition. Noncompetitive contracts do not include sole source contracts or contracts awarded under noncompetitive negotiation, both of which require negotiation. Noncompetitive contracts may be used when the public exigency or emergency for the requirement will permit a delay in competitive solicitation.

If my summer sites won't serve meals this year, for example, on a college campus that won't be open, will I have to attend new sponsor training next summer?

Yes, your organization would be required to attend two-day new sponsor training in the year that you would like to participate again. All sponsoring organizations that don't participate in SFSP for a summer season are required to attend two-day new sponsor training to resume their participation. New policies, guidance, or updates to federal regulations are issued throughout the year, and we want to ensure you are up to date on the current requirements.

With the current COVID-19 pandemic, why are we required to get a permit for the kitchen in the name of our organization when the kitchen we are renting for the SFSP already has permit? Can we waive this requirement in a time like this, so we can serve our community?

The requirement for the food service permit is a Department of Public Health requirement. The regulations require that we adhere to all the local health and sanitation requirements applicable to our state. As it stands, DPH requires that the food service permit is required if an organization is self-prepping their meals, and the permit must be in the name of that organization. If sponsors desire an exception to the permit requirement, they should contact their local health department.

How can I operate an SFSP feeding site that complies with the Governor's and local executive orders regarding social distancing?

Below are suggestions that help comply with the Governor's executive order that limits groups to 10 or fewer individuals who always maintain at least six feet between individuals. Sponsors and sites should also review and comply with any local orders that may be in place. As private businesses, sponsors are solely responsible for interpreting all orders to ensure the site is able to operate and not violate any

jurisdiction's requirements. DECAL offers the following guidance; however, DECAL's interpretations are the department's alone and should not be the only criteria considered when determining whether to maintain operations or to cease operations.

- Have the children walk up to the food counter one at a time
- Utilize the non-congregate waiver, and let the children pick up a meal and take it home
- Allow the children and their parent/guardians to enter the building and pick up meals in groups of 10 or less
- Limit number of staff working in the kitchen together
- Clean surfaces that are frequently touched including shared countertops, kitchen areas, and doorknobs

Can schools that have been approved for non-congregate feeding through SFSP or SSO deliver meals directly to students' homes?

If a School Food Authority (SFA) determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with state agency approval, adherence to all federal confidentiality requirements, and with all necessary federal waiver approvals (including an approval for non-congregate feeding). Delivery could be accomplished by mail or delivery service, or hand delivered by school staff, volunteers, community organizations, or others. **This option is available to SFA sponsors of school sites only** due to student confidentiality and logistical requirements. Non-SFA sponsors are encouraged to work with local SFAs where possible.

FOR BOTH CACFP & SFSP

Do you need to have "And Justice for All" (AJFA) posters on mobile routes for COVID-19 meal distribution?

The AJFA poster must be prominently displayed in all facilities and locations that distribute program benefits or administer services. Due to COVID-19, if printed AJFA posters are not available for display, paper copies may be substituted as necessary, including use of the 2015 AJFA poster, if new (2019) posters have not been received. Meals delivered from stationary vans or buses should display the AJFA poster. For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed.

Will I be able to continue to offer grab and go or mobile meals this summer?

Yes, sponsors who have been approved to use the non-congregate waiver will be allowed to offer grab and go or mobile meals. The meal time and non-congregate waiver also allows you to distribute multiple meals for the entire week.

**Reference the Waiver Chart under the Additional Resources for Nutrition Programs section to view all waiver effective dates. **

How do I submit a waiver request?

Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any new requests for waivers must be completed through an online Waiver Participation Form in the new USDA Waivers Module in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under COVID-19 Resources; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the Training and Technical Assistance webpage and the GA ATLAS Waiver Guide can be

found under COVID-19 Resources in the Nutrition Waivers – Waiver Request Forms section. NOTE: If you have already submitted and have been approved to use a waiver, you do not have to submit the request again. Once your waiver form(s) is/are submitted, allow DECAL adequate time to process the information and respond with either an approval or denial of each request. Approved nationwide waivers include those for meal time, meal patterns, non-congregate feeding, parent pick-up, monitoring requirements, FSMC contract and area eligibility.

For general questions about the waiver process, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA Mailbox at <u>NutritionTA@decal.ga.gov</u>.

Due to COVID-19 and social distancing, can Child Nutrition Program (CNP) operators provide online training to Program staff?

Yes, if onsite training is **not** conducted due to social distancing, program operators may conduct online training via webinar or provide staff and/or sponsored sites with training materials via other methods, such as email. If Internet access is unavailable, staff and/or sponsored sites may pick up hard-copies of training materials. Training materials may include, but are not limited to:

- PowerPoint presentations
- CACFP/SFSP Handbooks (Independent Child Care Center CACFP; At-Risk Afterschool Meals Handbook; SFSP Administrative Guide)
- CACFP/SFSP policies/memos
- Assessment (optional)

Program operators must collect and maintain documentation to verify that all staff and/or sponsored sites have been trained. If written signatures are **not** obtained on sign-in sheets, the program operator may request an email confirmation from staff and/or sponsored sites to certify that training materials were received and reviewed. Or the program operator may create and disseminate an assessment to staff and/or sponsored sites to complete and return to verify training completion. In summary, the following documentation must be maintained.

- Training Agenda
- A list of staff members who received training materials
- Date training materials were disseminated
- How training materials were disseminated (webinar; web-based; email; hard-copy)
- Printed email from staff to certify that training has been received and reviewed **or** a completed, printed assessment from staff

Contact your assigned Technical Assistance Coordinator or the Nutrition TA mailbox at **NutritionTA@decal.ga.gov** with any further questions/concerns.

Name	Title	Phone	Email	Region
LaKisha Robinson	TA Coordinator	(478) 314-2806	LaKisha.Robinson@decal.ga.gov	Southeast
Deidrea Thompson	TA Coordinator	(866) 370-3203	Deidrea.Thompson@decal.ga.gov	East
Victoria Carden	TA Coordinator	(470) 532-0873	Victoria.Carden@decal.ga.gov	Southwest
Nkem ljeh	TA Coordinator	(404) 973-4099	Nkem.ljeh@decal.ga.gov	North/NW

Tanya Coleman TA Coordinator	(470) 373-7826	Tanya.Coleman@decal.ga.gov	Metro West	
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The Nutrition Division asks all institutions to submit CACFP and/or SFSP documents electronically via email or uploaded in GA ATLAS. If information is uploaded in GA ATLAS, notify your assigned Application Specialist or Business Operations Representative.

For CACFP/SFSP Applications, contact:

Institutions 0 (zero) - G Paula Lawrence, Application Specialist 404-463-2111 Paula.lawrence@decal.ga.gov

Institutions H-P Sherika Blount, Application Specialist 404-656-6411 <u>Shericka.blount@decal.ga.gov</u>

Institutions Q-Z Kenya Taylor, Application Specialist 404-463-4040 Kenya.Taylor@decal.ga.gov

What are the procurement standards that apply when the non-competitive proposal method in 2 CFR 200.320(f) is used?

A non-competitive proposal follows the same requirements as a competitive proposal, except a noncompetitive proposal can be obtained from one (1) source. The requirements include all procurement standards in 2 CFR 200.317-326 and all program requirements in 7 CFR 210, 225 and 226 applicable to goods and services procured.

Work performed under a non-competitively procured contract is specifically related to the exigent or emergency circumstance in effect at the time of procurement. This is because the exception to competitive procurement is available only while the exigent or emergency circumstances exists. If program operators award a non-competitive contract, as soon as the exigent or emergency circumstances cease to exist, they must immediately begin competitively procuring similar goods and services to transition to a competitively procured contract. NOTE: Each non-competitive procurement method used requires a separate justification to address threats to life, improved property, and public health and safety.

Do I need to complete the meal pattern waiver if I am having a problem finding milk?

Yes. Institutions or sponsors who cannot provide certain meal components due to a food shortage need to request a waiver and document the shortage of that meal component. Institutions or sponsors may be able to claim the meal without the required meal component if they have an approved meal pattern waiver for the component not served. **NOTE:** Beginning July 1, 2021, the meal pattern flexibility waiver for CACFP will only waive the following three [3] meal pattern requirements. All other meal pattern requirements will remain in effect.

- 1. At least one [1] serving per day, across all eating occasions, must be whole grain rich.
- 2. The crediting of grains by ounce equivalents must be fully implemented by October 1, 2021.

3. Low-fat milk (1 percent) must be unflavored.

For more information regarding this waiver, select <u>Response #91</u>.

Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any <u>new</u> requests for waivers must be completed through an online Waiver Participation Form in the new USDA Waivers Module in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under <u>COVID-19 Resources</u>; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the <u>Training and Technical Assistance webpage</u> and the <u>GA ATLAS Waiver Guide</u> can be found under <u>COVID-19 Resources</u> in the *Nutrition Waivers – Waiver Request Forms* section. **NOTE: If you have already submitted and have been approved to utilize a waiver, you do not have to submit the request again.** For general questions about the waiver, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA Mailbox at <u>NutritionTA@decal.ga.gov</u>.

waiver effective dates. **

Will there be leniency with meal pattern compliance due to food shortages?

With waiver approval, the requirement to serve meals that meet the meal pattern requirements is waived during the public health emergency. Institutions or sponsors who cannot provide certain meal components due to a food shortage may request a waiver and document the shortage of that meal component. Institutions or sponsors may be able to claim the meal without the required meal component if they have an approved meal pattern waiver for the component not served. **NOTE:** Beginning July 1, 2021, the meal pattern flexibility waiver for CACFP will only waive the following three [3] meal pattern requirements. All other meal pattern requirements will remain in effect.

- 1. At least one [1] serving per day, across all eating occasions, must be whole grain rich.
- 2. The crediting of grains by ounce equivalents must be fully implemented by October 1, 2021.
- 3. Low-fat milk (1 percent) must be unflavored.

For more information regarding this waiver, select <u>Response #91</u>.

Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any <u>new</u> requests for waivers must be completed through an online Waiver Participation Form in the new **USDA Waivers Module** in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under <u>COVID-19 Resources</u>; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the <u>Training and Technical Assistance webpage</u> and the <u>GA ATLAS Waiver Guide</u> can be found under <u>COVID-19 Resources</u> in the *Nutrition Waivers – Waiver Request Forms* section. **NOTE: If you have already submitted and have been approved to utilize a waiver, you do not have to submit the request again.** For general questions about the waiver, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA Mailbox at <u>NutritionTA@decal.ga.gov</u>.

Reference the Waiver Chart under the Additional Resources for Nutrition Programs section to view all waiver effective dates.

Are we required to follow the standard mealtime requirements during COVID-19?

With waiver approval, the requirement that meals must follow meal service time requirements is waived during the public health emergency. This waiver waives the requirement that a certain amount of time must lapse between meal services and the requirement that the meal service be limited to a certain amount of time. However, the waiver still requires sponsors to establish a meal service time. Keep your application current with meal service times. DECAL must know your actual meal service times so that DECAL reviewers will know what time meal services will begin and end.

** Reference the Waiver Chart at the end of this FAQ document to view all waiver effective dates. The chart is under the *Additional Resources for Nutrition Programs* section.**

Do I need to apply for the waivers, or can I automatically use them?

While DECAL has opted to participate in several USDA waivers, sponsors must request and receive approval to use the waivers. This applies to waivers used in the CACFP and SFSP. **NOTE:** Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any <u>new</u> requests for waivers must be completed through an online Waiver Participation Form in the new **USDA Waivers Module** in GA ATLAS. Operators will still be required to complete the applicable Waiver Request Form located on DECAL's website under <u>COVID-19 Resources</u>; however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. A Memo Monday recording on how to use this new feature can be found on the <u>Training and Technical Assistance webpage</u>, and the <u>GA ATLAS Waiver Guide</u> can be found under <u>COVID-19 Resources</u> in the *Nutrition Waivers – Waiver Request Forms* section. **NOTE: If you have already submitted and have been approved to utilize a waiver, you do not have to submit the request again.**

For general questions about the waiver, contact Tammie Baldwin at <u>Tammie.Baldwin@decal.ga.gov</u> or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA mailbox at <u>NutritionTA@decal.ga.gov</u>.

What documentation must be collected, submitted, and maintained for home meal delivery?

To ensure program compliance, DECAL must verify that actual meals are delivered to households. Therefore, CNP operators must collect the following information for home meal delivery. Operators must also attest to this information when completing the <u>Combined Waiver Request Form</u> for home meal delivery.

- Written consent from households of eligible children and/or adult participants that the household wants to receive delivered meals
- The number of children/adults being served
- The household's current contact information (address)

Sponsors are required to submit and upload the household's current contact information into GA ATLAS *Attachment List* section via a list or an Excel spreadsheet. The documentation must also be maintained on file and made available upon review. NOTE: Sponsors are required to notify households that their contact information will be shared with DECAL. Additionally, if a household does not want to share their contact information with DECAL, then the home delivery household/address would not be eligible for reimbursement. In that case, refer the household to a non-congregate (grab and go) meal site in their area. Ensure that the households you serve are aware of safeguard measures that your organization has in place to preserve their confidentiality. For more information on other requirements for meal delivery click on *Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meal Delivery Using Existing Authority, Questions and Answers*.

May a Child Nutrition Program operator donate leftover food or milk to a CACFP day care home provider?

Section 9(1) of the Richard B. Russell National School Lunch Act allows leftover foods to be donated to eligible local food banks or other charitable organizations. This includes any food bank or charitable organization that is exempt from tax under section 501(c)(3) of the Internal Revenue Code of 1986 {26 U.S.C § 501(c)(3)}. Therefore, if the CACFP day care home provider has 501(c)(3 status, they are eligible to receive donations from other Child Nutrition Program operators.

SP 11-2012, CACFP 05-2012, SFSP 07-2012 Guidance on the Food Donation Program in Child Nutrition

<u>Programs</u> encourages schools, CACFP institutions, and SFSP sponsors to maximize using leftover food before discarding it. The memo allows leftover foods to be used in subsequent Child Nutrition Program meal services or transferred to other meal sites. However, Child Nutrition Program operators must check state and local food safety requirements before transferring or donating leftover food and milk. If a school, CACFP institution, or SFSP sponsor has leftover food on a frequent basis, menu planning and production practices should be adjusted to reduce leftovers. For more information, see <u>Questions and</u> <u>Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless</u> <u>Summer Option Operations during School Year 2020-2021 – Q&A #4</u>.

Do stimulus payments or the weekly unemployment insurance payments provided through the CARES Act and Consolidated Appropriations Act, 2021 count as income when determining eligibility for Child Nutrition Programs?

COVID-19-related stimulus payments do not count as income for determining free and reduced-price eligibility for the National School Lunch Program (NSLP) or School Breakfast Program (SBP) or eligibility for tier I reimbursement for CACFP. Because these payments are tax rebates, they "shall not be taken into account as resources for a period of 12 months from receipt, for purposes of determining the eligibility of such individuals (or any other individual) for benefits or assistance (or the amount or extent of benefits or assistance) under any federal program or under any state or local program financed in whole or in part with Federal funds" (<u>26 U.S. C ode § 6409</u>). The <u>IRS</u> also clarifies that these specific coronavirus payments will not affect income for purposes of determining eligibility of federal government assistance or benefit programs.

However, the weekly COVID-related supplemental unemployment benefits provided through the CARES Act and Consolidated Appropriations Act, 2021 <u>do count</u> as income for means-tested benefits (other than Medicaid and the Children's Health Insurance Program), including free and reduced-price meals (<u>U.S. Senate Committee on Finance FAQ</u>). Food and Nutrition Service <u>Income Eligibility Guidelines</u> also indicate that unemployment benefits must be counted as income. For more information, see <u>Questions</u> and <u>Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless</u> <u>Summer Option Operations during School Year 2020-2021 – Q&A #4</u>.

May Child Nutrition Program operators who have received a loan through the Paycheck Protection Program (PPP) from the Small Business Administration and qualified lending partners use SFSP or CACFP program funds received from the state (Child Nutrition Program federal funds) to pay back a PPP loan?

Congress authorized the Paycheck Protection Program (PPP) through the CARES Act and Consolidated Appropriations Act, 2021 to help businesses facing extenuating circumstances, due to the COVID-19

pandemic, cover their payroll expenses. Some sponsors have used PPP funds to pay for Child Nutrition Program labor expenses.

Under certain circumstances, a PPP loan may be forgiven.

- If the PPP loan is forgiven: <u>Any Child Nutrition Program expenses paid for using those forgiven</u> <u>PPP funds</u> may not be claimed using Child Nutrition Program funds since they have *already* been paid with another source of federal funding.
- If the PPP loan is <u>not</u> forgiven: Child Nutrition Program funds may only be used to repay that portion of the loan that was used to cover allowable Child Nutrition Program expenses. This is consistent with existing guidance outlined in the <u>FNS Instruction 796-2 Rev. 4</u> (refer to the heading titled, *Cost Funded from Other Sources and Under Recovery of Cost*). Program operators using Child Nutrition Program funds to repay any portion of a PPP loan must fully document such repayments, be able to demonstrate that funds were properly allocated, and that such repayments were limited to the portion of the loan that was used to cover allowable expenses under Child Nutrition Programs. In most circumstances, FNS anticipates that the same payroll cost allocation used by the program operator under normal procedures will continue to apply when considering PPP repayments, though exceptions may occur.

However, note that interest due in connection with a PPP or other loan repayment is <u>not</u> an allowable cost and may not be paid using federal Child Nutrition Program funds, per requirements at 2 CFR 200.449(a). Program operators are further reminded that Child Nutrition Program funds may only be used to pay for allowable Child Nutrition Program expenses. For any portion of a PPP loan that was used to pay for non-Program expenses, Child Nutrition Programs funds may <u>not</u> be used for repayment. See <u>Questions and Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and</u> <u>Seamless Summer Option Operations during School Year 2020-2021 – Q&A #4</u>.

The Monitoring Nationwide Waivers ask state agencies and local operators to continue monitoring activities of program operations offsite to the maximum extent practicable. Which portions of the review could a state agency conduct offsite?

During the public health emergency, state agencies and sponsoring organizations should review to the best of their ability all elements of program operations that would normally be reviewed onsite. This includes all the review elements found in 7 CFR 226.16(d)(4)(i) for CACFP and 7 CFR 225.15 for SFSP. Offsite monitoring through a desk review can be conducted by reviewing records that have been emailed, faxed, or delivered. In situations where direct observation normally occurs, such as observation of meal service, point of service, health and safety, alternative observation can be conducted virtually by using video and/or photos of meal service. Sponsoring organizations may also conduct interviews with program staff and participants via phone or video conference to verify information in photos.

When using technology such as a video or photos, sponsoring organizations should follow any federal and state laws related to technology use and privacy. Information that contains Personally Identifiable Information (PII), such as applications or eligibility status, should be protected. Information shared by programs should be password protected or sent via other secure methods to ensure privacy. For more information on offsite monitoring strategies and documentation, refer to the applicable *Child Nutrition Programs Offsite Monitoring Fact Sheets* posted on the DECAL website under <u>COVID-19 Resources</u>.

What is necessary to amend budgets to get approval for disinfectants, etc. when these products become more readily available?

Due to the current situation, cleaning supplies such as disinfectants would be considered necessary and reasonable costs. If an institution would like to charge these costs, the ATLAS Budget Detail (Non-food supplies budget category) must be revised if any of the following factors apply:

- A new cost is incurred that wasn't previously approved in the budget.
- A line item increases or decreases by 20% or more. A line item is defined as the function level, Operating and Administrative and/or the Program level CACFP and SFSP. If a change impacts either level by 20% or more, a budget revision is required.
- When allocation methodologies change due to changes within the organization resulting in an increase or decrease of 20% or more.
- A new cost item will be incurred that requires prior or specific prior approval or special consideration (i.e., formal procurement)
- When an approved specific prior written approval item's actual cost is found to be more than the actual approved amount.
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- A new cost item will be incurred that requires prior or specific prior approval or special consideration (i.e., formal procurement).
- When an approved specific prior written approval item's actual cost is found to be more than the actual approved amount.
- Costs that exceed established maximums are unallowable, and the 20% rule does not apply when established maximums are breached.

Once the budget revision is completed, notify the Budget Compliance Supervisor at <u>Shonda.Franklin@decal.ga.gov</u>

Are we required to follow the standard mealtime requirements during COVID-19?

With waiver approval, the requirement that meals must follow meal service time requirements is waived during the public health emergency. This waiver waives the requirement that a certain amount of time must lapse between meal services and the requirement that the meal service be limited to a certain amount of time. However, the waiver still requires sponsors to establish a meal service time. Keep your application current with meal service times. DECAL must know your actual meal service times so that DECAL reviewers will know what time meal services will begin and end.

Meal Times Waiver is in effect until December 31, 2020 for SFSP and June 30, 2021 for CACFP

What resources or policy guidance is available relating to the Coronavirus?

To date, the following guidance was posted to the DECAL website:

- Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks, March 13, 2020
- Centers for Disease Control and Prevention
 - o http://www.cdc.gov/flu/freeresources/index.htm
 - o <u>https://www.cdc.gov/coronavirus/2019-ncov/specific-groups/children-faq.html</u>
 - o https://www.cdc.gov/coronavirus/2019-ncov/downloads/2019-ncov-factsheet.pdf
- Georgia Department of Public Health
 - o http://dph.georgia.gov/influenza-what-you-need-know
 - o https://dph.georgia.gov/coronavirus-disease-2019-covid-19-outbreak

Am I able to donate leftover perishable food items to my children during the public health emergency?

Currently, DECAL is not aware of any flexibility allowing excess food (specifically perishable food items) purchased for the CACFP or SFSP to be donated to program participants in the wake of unforeseen circumstances such as Coronavirus.

Because of unforeseen circumstances, occasionally there will be leftover food. All alternatives permitted by program regulations and state and local health and sanitation codes should be exhausted before discarding food. Options may include using leftovers in subsequent meal services, offering "sharing tables," or transferring food to other sites. (See attached: Donation of Leftover Foods from School Cafeterias, June 11, 1996). Where it is not feasible to reuse leftovers, excess food may be donated to a non-profit organization, such as a community food bank, homeless shelter, or other nonprofit charitable organizations. See:

https://fns-prod.azureedge.net/sites/default/files/cn/SP11_CACFP05_SFSP07-2012os.pdf

When do the waivers end?

All of the waivers are located on the <u>COVID-19 resources page</u>. Click on the document to see the end date for each waiver. A convenient chart that includes the waiver duration and description is available in the <u>ADDITIONAL RESOURCES FOR NUTRITION PROGRAMS</u> section of this document.

What food items may be provided in bulk when providing multiple meals at a time during COVID-19? The following food items may be provided in bulk.

- Foods that normally credit towards reimbursable meals under the CACFP or SFSP.
- Foods that are recognizable as a meal component in a reimbursable meal.
- Foods that do not require much preparation or the addition of other ingredients (aside from water) before eating.

Can frozen, bulk foods be provided when serving multiple meals at a time during COVID-19?

Yes. Frozen foods, which require minimal preparation other than heating, may be provided as part of meals if they meet meal pattern requirements. Providing foods in a frozen state may present a safe way to offer perishable foods for consumption later in the week (e.g., four or five days after distribution).

What documentation is required when providing multiple meals at a time during COVID-19?

When providing multiple meals at a time, program operators must continue to maintain documentation and menu records that show the served meal components and quantities for each age group. Program operators must keep supporting menu documentation, such as labels, recipes, and manufacturer specifications in accordance with program regulations.

Are we required to provide meal accommodations when providing bulk food items and/or providing multiple meals at a time during COVID-19?

Program operators must continue to provide reasonable modifications to program meals or the meal service to accommodate children with disabilities.

What should program operators consider when deciding how many days of meals to provide at a time during COVID-19?

Program operators should consider the following when deciding how many days of meals to provide at a time.

- How long foods may be safely stored before eating?
- How long foods can be stored before food quality suffers?
- Participants' access to refrigeration and freezer space for the amounts of food and milk provided.
- Food storage space at the child care site and on meal delivery vehicles (such as buses or food trucks).
- Whether fewer pick-up days and times will decrease access to meals for some children.

Can children, or in CACFP, adult participants, pick up multiple meals at the same time?

Yes. Under the Meal Service Times Flexibility waiver, program operators are not required to serve meals at a certain time, or to allow a certain amount of time to elapse between meals. Therefore, program operators participating under this waiver and the Non-Congregate Feeding waiver may allow children or adult participants to pick up multiple meals at one time, up to one week at a time. The maximum number of meals that may be served and claimed for federal reimbursement per child or adult participant per day remains the same; however, the state agency may approve a distribution approach that allows children or adult participants to pick up meals to pick up meals for multiple days, up to one week at a time. Program operators must continue to maintain documentation and menu records that show the served meal components and quantities for each age group. Program operators must keep supporting menu documentation, such as labels, recipes, and manufacturer specifications in accordance with program regulations.

Is the purchase of personal protective equipment or other supplies to prevent or reduce the spread of COVID-19 an allowable cost?

Yes. Personal protective equipment (e.g., gloves and face masks) and cleaning and sanitary supplies are allowable costs during the current public health emergency, provided that such purchases are made in support of child nutrition program operations. All purchases must continue to meet the required criteria of being reasonable, necessary, and allocable (refer to 2 CFR 200.404 and 200.405).

May funds from the nonprofit food service account be used to purchase bottled water (as an alternative to water fountains and other onsite options) for non-congregate meals served during the public health emergency?

Yes. The purchase of potable, bottled water to supplement meals served in non-congregate settings is an allowable cost. For more information, click on the following policy memorandums: <u>Water Availability</u> <u>in CACFP</u> and <u>Resources for Making Potable Water Available in Schools and Child Care Facilities</u>. State and local agencies should remember that milk is expected to be served as part of each reimbursable meal, and potable water may not be provided as a substitute for milk.

May local program operators pay staff salaries using funds from the nonprofit food service account when employees are unable to work due to mandatory closures related to the current public health emergency? Is compensation in the form of hazard pay for employees who are still working also allowable?

Yes, but only when such employee absences are covered under the local program operator's written Compensation Plan or established personnel policies. FNS has determined that local program operators with such policies may continue to pay out salaries and benefits to their employees during mandatory closures due to COVID-19, which qualify as an "authorized absence from the job" for affected employees in accordance with the requirements of 2 CFR 200.431(b). These payments must be consistent with the program operator's Compensation Plan of paying salaries (under unexpected or extraordinary circumstances) from all funding sources, federal and non-federal, and must be fully allocable. Compensation in the form of hazard pay for employees continuing to work is further considered an allowable cost, provided that such compensation is similarly permissible under the program operator's Compensation Plan, and the hazard pay in question is reasonable.

Any of these covered personnel costs may be charged retroactively to the date on which mandated staff absences and/or work that occurred when the hazardous conditions related to COVID-19 began. Program operators may draft or update their Compensation Plan to include leave, salaries, and benefits during unexpected and extraordinary circumstances if it is not already in place. Any new or updated policies to the Compensation Plan must also be fully in accordance with the requirements of 2 CFR, and consistent in their payment of salaries and benefits regardless of the funding sources used/available, both federal and non-federal (as described above).

How should SFAs, institutions, or other grantees treat non-refundable costs for events and activities that were cancelled due to COVID-19 closures and social distancing protocols?

If an institution or other child nutrition program grantee had expended funds for an approved and otherwise allowable program cost (e.g., travel, meeting registration, supplies) for an event or activity that was cancelled due to COVID-19 closures, and those costs were not refunded by the vendor, the grantee may charge those costs to their program. Grantees should keep records of the original expense, and their attempt to obtain refunds. Grantees should also ensure that any materials of value, such as travel vouchers, supplies, materials, etc., that can be repurposed or used later, are used for the operation of the child nutrition program or a related activity. This flexibility applies only to costs incurred before the expiration of OMB Memo, M-20-17, *Administrative Relief for Recipients and Applicants of Federal Assistance Directly Impacted by the Novel Coronavirus, Due to the Loss of Operations*.

Can neighborhood representatives or community members pick up meals on behalf of various households?

No. Only the actual parent or guardian of the eligible child may pick up meals. Sponsors requesting to utilize the parent pick up waiver will be required to demonstrate that controls are in place to ensure that only parents or guardians pick up meals for eligible children and adults and that they are not receiving duplicate meals.

Can Head Start programs serve meals during the public health emergency?

Head Start locations may continue to participate in the CACFP in the summer but will need to update their site applications to reflect the new operating dates and notify their Business Operations Representative of the change. Alternatively, Head Start locations may serve meals under an existing

SFSP sponsor. There are several waivers that are now available for SFSP and CACFP. Head Start Programs currently participating in the CACFP can notify DECAL if they wish to participate in the waivers. For additional information, contact <u>Leslie.Truman@decal.ga.gov</u>.

Will the meal reimbursement rate increase, given the fact that food costs have increased dramatically?

We are not aware of any changes in the meal reimbursement rates. If the rates do change, we will communicate that information to you as soon we receive it.

How do I keep my meal sites safe?

We know you are taking every precaution to protect the employees, volunteers and families at your meal sites. If, however, you learn that an individual at your meal site (be it a child, parent, or staff member) becomes ill and tests positive for COVID-19, follow the procedures below immediately:

- *cease* the meal service
- report the case to your local health department
- contact your application specialist or Leslie Truman at 404.657.1779
- quarantine the area and persons impacted for 14 days

If you need additional guidance, visit the CDC website here.

For portions of the review where direct observation is normally required, what alternatives may states and locals use to complete reviews offsite?

In situations where direct observation normally occurs, such as observation of meal preparation, meal pattern components, verification of attendance, and food safety issues, examples of alternatives include state and local program operators conducting alternative observation using video or photos and/or pictures of meal preparation and meal service. States may also conduct interviews with staff and program participants via telephone or video conference to verify information in photos.

Is the Nondiscrimination Statement required on informational materials and websites?

States must comply with their obligation to include the required Nondiscrimination Statement (NDS) on all printed and electronic program materials made available to applicants, participants, and potentially eligible persons for public information, public education, or public distribution. This includes, but is not limited to, information pertaining to eligibility, benefits, services, the location of local facilities or service delivery points, and hours of service.

If the size of the material is too small to include the full statement, the material must, at a minimum, include the following statement in print in the same font size as the main text: "This institution is an equal opportunity provider." On websites, the Nondiscrimination Statement (NDS) or a link to it, must be included on the home page of the program information.

Can children, or in CACFP, adult participants pick up multiple meals at the same time?

Yes. Under the Meal Service Times Flexibility waiver, program operators are not required to serve meals at a certain time or to allow a certain amount of time to elapse between meals. Therefore, program operators participating under this waiver and the Non-Congregate Feeding waiver may allow children or adult participants to pick up multiple meals at one time, up to one week at a time. The maximum number of meals that may be served and claimed for federal reimbursement per child or adult participant per day remains the same; however, the state agency may approve a distribution approach

that allows children or adult participants to pick up meals for multiple days, up to one week at a time. Program operators are also required to maintain accurate meal counts by program and submit claims by program.

If a CACFP site closes as a result of the coronavirus pandemic, can it become an SFSP site and offer meals? What if schools in the area have or have not closed?

A CACFP site that is closed during the pandemic may become an SFSP site under an SFSP sponsor that has been approved by the DECAL. If the sponsor intends to operate the site as an open site and serve the community at large, the site must be in an eligible area, unless the state agency has approval to waive the area eligibility requirement and has approved the site to operate under the waiver. SFSP sites may only operate during the regular school year in cases of unanticipated school closures, or during breaks for schools operating on a continuous calendar. If schools in an area are open, meals would be served under the National School Lunch and School Breakfast Programs, and SFSP would not be an option.

If a child care center or day care home continues to provide CACFP meals and snacks during the COVID-19 pandemic, can the facility also be approved to operate as an SFSP site?

Yes. CACFP institutions that have developed a separate food service program for children who are not enrolled in their day care homes or centers may be approved to participate as an SFSP site under an SFSP sponsor that has been approved by the DECAL. The CACFP institution must meet SFSP eligibility criteria, ensure that the same children are not served meals in both programs, and keep separate records for each program. To operate as an open SFSP site, the facility must be in an "area in which poor economic conditions exist," as defined at 7 CFR 225.2 of SFSP regulations, unless the state agency is approved to grant waivers of the restrictions on site eligibility. SFSP sites may only operate during the regular school year in cases of unanticipated school closures, or during breaks for schools operating on a continuous calendar. If schools in an area are open, meals would be served under the National School Lunch and School Breakfast Programs, and SFSP would not be an option.

Will racial and ethnic data be collected if it is not provided by applicants during telephone interviews and online systems?

For current households, states may use existing school meal enrollment applications. For new applications, states are encouraged to use information from other State Education Agencies, or from other household public assistance benefits received such as the Supplemental Nutrition Assistance Program (SNAP).

Will meal pattern waivers affect a program operator's responsibility to make meal modifications for participants with disabilities?

During this public health emergency, states and program operators are not relieved of their obligation to provide meal modifications for participants with disabilities. When planning a non-congregate meal service, state agencies and program operators should consider how individuals who require meal modifications will be identified and served.

May program operators provide non-congregate meals at different locations that were not previously approved by the state agency?

No. The state agency must approve all locations for distribution of meals.

Under the current nationwide waivers allowing non-congregate feeding and no meal time restrictions due to COVID-19, may Child Nutrition Program operators provide food items in bulk, either through pick up or home delivery, without additional waivers?

Under current statutory and regulatory authority and in conjunction with recent COVID-19 waivers allowing non-congregate feeding and no meal time restrictions when providing multiple meals at one time, program operators may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal. When implementing such a delivery mechanism, program operators:

- Must include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- Must ensure that food items are clearly identifiable as making up reimbursable meals;
- Are strongly encouraged to provide menus with directions indicating which items are to be used for each meal and the portion sizes;
- Should consider if households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Should ensure that only minimal preparation is required, i.e., that food provided as ingredients for recipes does not require chopping, mixing, baking, etc.

Additionally, pursuant to 7 CFR 226.6(i)(11), state agencies may approve requested flexibilities for unitized meals prepared by food service management companies or delivered to CACFP outside-school-hours care centers.

What is the maximum number of program meals and snacks that can be claimed for federal reimbursement each day?

The maximum number of meals or snacks that can be claimed for federal reimbursement, per child or adult participant, per day, varies by program:

- NSLP: Up to one lunch per child per day;
- NSLP Afterschool Snack Service: Up to one snack per child per day;
- NSLP Seamless Summer Option: Up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper;
- SBP: Up to one breakfast per child per day;
- CACFP Child and Adult Care: Up to two meals and one snack, or two snacks and one meal, per child or adult participant per day;
- CACFP At-Risk Afterschool Meals Component: Up to one meal and one snack, per child per day;
- CACFP Emergency Shelters: Up to three meals, per resident 18 years and younger, per day; or
- SFSP: Up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper.

Some program operators participate in multiple programs. For example, under typical circumstances, in one day, a program operator may serve a child breakfast through SBP, lunch through NSLP, and supper and snack through CACFP At-Risk. Under the waivers, a child may still participate in more than one program, but in no circumstances shall a child receive more than the number of meals allowed in each program for which they are eligible. Operators must also ensure children do not receive duplicates of the same meal.

Can we provide hot supper meals at mobile sites? They would be set up so that children come through a line and pick up a to-go plate.

Summer food sponsors have the option of providing hot supper meals at mobile sites using to-go containers. CACFP providers/institutions now have the option of offering congregate feeding so you also provide meals in a "take out" container through a mobile site or supper. Ensure that your application always reflects your current operations.

Is it allowable to freeze milk and use it after the expiration date?

Although unopened milk is safely stored in the freezer at 0°F for up to three months, freezing milk is not recommended. Freezing milk, specifically high fat milk (whole milk), causes changes that will deteriorate the texture, preventing it from being used as fluid milk. Additionally, the CACFP Crediting Handbook provides guidance that foods past the expiration date are not creditable. Therefore, if the milk expires, the milk will need to be discarded even if it has been frozen.

What is an example of a non-congregate setting?

There are different variations. Some facilities provide meals packaged in a to-go box at their existing site that has already been approved. It's a complete unitized meal that the child picks up and takes home. This is also appropriate when serving meals to adults. Another option would be to provide meals at the door so that no one enters the facility.

Is there a list of approved vendors able to provide meals and/or individual food items during the emergency?

DECAL Nutrition Services currently does not have an "approved" list of vendors. However, following is a link to vendors and supplier currently serving our program providers. http://decal.ga.gov/documents/attachments/CACFP_SFSP_WebVendorList.pdf

Will claims be processed as usual or will they be delayed?

We don't anticipate any delays in claims processing. Continue to adhere to the claim's submission requirements, and you will be paid according to the regular schedule.

How do I add sites to my SFSP or CACFP application? Do we fax Add a Site packages to the DECAL Nutrition office?

Submit your emergency feeding sites to your business operations representative. Approving additional sites is a priority, so our Nutrition staff will process sites as quickly as possible. There are several options to submit information. You may email your business operations representative with the add a site information or you may upload it to ATLAS and alert your business ops specialist by sending them a notification email.

Do we have authorization to pay food service staff double time, such as cooks, when they come in to prepare meals?

We have not received specific guidance from the USDA on this topic; however, any CACFP institution should adhere to its approved budgeted amounts and compensation plan.

If we are experiencing a milk shortage, what beverage alternative can we serve?

When experiencing a shortage of cow's milk, non-dairy alternatives may be used. However, alternatives must be nutritionally equivalent to cow's milk. Requiring non-dairy alternatives to be nutritionally equivalent to cow's milk ensures children receive vital nutrients needed for growth and development. Alternatives served to children ages 1-5 must be unflavored due to the higher sugar content of flavored varieties.

Acceptable non-dairy or cow's milk alternatives include:

- Low-fat or fat-free lactose-reduced, buttermilk and acidified milk
- Goat milk, sheep milk, buffalo milk (must be pasteurized)
- Soy milk (calcium and vitamin D fortified)

<u>Unacceptable</u> non-dairy or cow's milk alternatives include:

(These are examples and do not represent a comprehensive list.)

- Juice
- Almond milk
- Rice milk
- Almond milk "plus"
- Cashew milk
- Coconut milk
- Water
- Hemp milk
- Oat milk
- Whole grain drink
- Flax milk
- Calcium-fortified orange juice

Yogurt may not be substituted for fluid milk for children of any age. This is because milk provides a wealth of nutrients growing children need, such as vitamin A and D, and comparable quantities of these nutrients are not currently found in commercially available yogurts.

If cow's milk and acceptable non-dairy alternatives on the above acceptable list are served, no special approvals or waivers are required. However, if cow's milk or acceptable non-dairy alternatives are not available, and you are a CACFP or SFSP participant, you may contact DECAL to discuss a waiver of the milk requirement. Approvals would be based on a reasonable and justified need (e.g., public health emergency).

Governor Kemp has ordered many state employees to work from home to prevent the spread of the Coronavirus. Does DECAL plan to close their offices? If so, what is the best way to submit CACFP and/or SFSP documents to the team?

Currently, DECAL does not plan to close our offices although many DECAL employees are teleworking to ensure greater social distancing. Regardless, DECAL including the Nutrition Services division is conducting business as usual.

For CACFP/SFSP Add-a-Site Packages or Sponsor Updates, contact:

Institutions 0 (zero) - G Temika Moore, Business Operations Representative 404-463-1494 Temika.moore@decal.ga.gov

Institutions H-P Kenya Taylor, Business Operations Representative 404-463-4040

Kenya.taylor@decal.ga.gov

Institutions Q-Z Edith Pierre, Business Operations Representative 404-463-8314 Edith.pierre@decal.ga.gov

Are sponsors and institutions required to follow proper procurement procedures during an emergency?

Emergency purchases are defined as situations when the welfare of life, property, or the continuation of vital programs are in jeopardy and require immediate, on-the-spot purchases. Emergency purchases can be issued when there is limited time to purchase in the regular manner since the item or service is needed immediately. During an emergency, purchase, micro-purchase, and small purchase procedures are acceptable. Sponsors and institutions must have a process in place to document written quotes received via telephone and keep invoices and receipts on file. Contact DECAL if emergency purchases exceed formal procurement threshold limits.

See http://decal.ga.gov/documents/attachments/ProcurementManual.pdf

What is necessary to amend budgets to get approval for disinfectants, etc. when these products become more readily available?

Due to the current situation, cleaning supplies such as disinfectants would be considered necessary and reasonable costs. If an institution would like to charge these costs, the ATLAS Budget Detail (Non-food supplies budget category) must be revised if any of the following factors apply:

- A new cost is incurred that wasn't previously approved in the budget
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- A new cost item will be incurred that requires prior or specific prior approval or special consideration (i.e., formal procurement)
- When an approved specific prior written approval item's actual cost is found to be more than the actual approved amount
- Costs that exceed established maximums are unallowable, and the 20% rule does not apply when established maximums are breached.

Once the budget revision is completed, notify the Budget Compliance Specialist at <u>Tremachel.Johnson@decal.ga.gov</u>

ADDITIONAL RESOURCES FOR NUTRITION PROGRAMS

DECAL Participation of Nationwide Waivers Due to COVID-19

Pursuant to the COVID-19 Child Nutrition Response Act (the Act) (H.R. 6201, Title II), and based on the exceptional circumstances of this public health emergency, USDA's Food and Nutrition Service (FNS) established several nationwide waivers to support access to nutritious meals while minimizing potential exposure to the coronavirus.

Consistent with section 2202(a)(2) of the Act, while these waivers apply automatically to all states that elect to use them and without further application, state agencies must first inform their FNS Regional Office if they elect to be subject to the waiver(s).

The following table lists all waivers that DECAL has elected to utilize and has communicated to USDA's Southeast Regional Office (SERO).

Organizations that wish to use any of the waivers in the table must first notify Leslie Truman at Leslie.Truman@decal.ga.gov.

Waiver Type	Applicable	Brief Description of Waiver
	Program(s)	(For full details, please refer to the actual waiver memo)
Activity Requirement in At-Risk Afterschool	CACFP	The requirement that at-risk afterschool care centers/sites serve afterschool meals and snacks in a structured and supervised environment, with an educational or enrichment activity is waived during the public health emergency. **Waiver expired on June 30, 2020**
Waiver of Monitoring Requirements for CACFP Sponsoring Organizations	CACFP	 For sponsors only – CACFP monitoring requirements are waived as follows: (1) sponsors may conduct two reviews of their CACFP facilities; (2) only one CACFP facility review is required to be unannounced; (3) FNS waives that at least one unannounced review must include observation of a meal service; (4) FNS waives the requirement that not more than six months may elapse between reviews; and (5) allows sponsors to review new CACFP facilities as a desk audit. **Waiver expired on August 31, 2020**
(60) Day Reporting Requirements for January and February 2020 Claims	CACFP & SFSP	The requirement to submit claims for reimbursement no more than 60 days after the last day of the month has been waived for claims covering operations during the months of January and February 2020. **Waiver is no longer in effect**
Area Eligibility in the Afterschool Programs and for Family Day Care Homes Providers	CACFP	 (1) This waiver allows schools and at-risk afterschool care centers, regardless of their location, to claim all NSLP Afterschool Snack Service and CACFP At-Risk Afterschool Program meals and snacks at the free rate. This waiver also allows day care homes participating in the CACFP to claim all meals served to enrolled children at the Tier 1 rate, regardless of their location. (2) This waiver applies to State agencies administering, and local organizations operating, the NSLP and the CACFP. **Waiver effective until June 30, 2022**
Meal Pattern Flexibilities	CACFP	The requirement to serve meals that meet the meal pattern requirements is waived during the public health emergency. **Waiver is no longer in effect **
Specific Meal Pattern Flexibilities	CACFP	 Under this waiver, CACFP operators in States that elect to be subject to this waiver may serve meals that do not meet specified meal pattern requirements during the public health emergency due to COVID-19. (2) This waiver applies to State agencies administering and local organizations operating the CACFP.

		 FNS is establishing a waiver for all states of the following CACFP requirements: That at least one serving per day, across all eating occasions, must be whole grain rich. That the crediting of grains by ounce equivalents must be fully implemented by October 1, 2021. That low-fat milk (1 percent) must be unflavored. **Waiver <u>effective</u> until June 30, 2022**
Meal Time Waiver	CACFP	The requirement that meals must follow meal service time requirements is waived during the public health emergency. **Waiver <u>extended</u> until June 30, 2022**
Non-congregate Feeding	CACFP	The requirement that meals be served in a congregate setting and must be consumed by participants on site is waived during the public health emergency. **Waiver <u>extended</u> until June 30, 2022**
Parent Pick-Up	CACFP	Under this waiver, program operators in a state with an approved waiver allowing non-congregate meal distribution during COVID-19 related operations may distribute meals to a parent or guardian to take home to their eligible children. **Waiver <u>extended</u> until June 30, 2022**
Waiver of Onsite Monitoring Requirements for CACFP Sponsoring Organizations	CACFP	For sponsors only – FNS waives, for all CACFP sponsoring, that CACFP monitoring requirements included at 7 CFR 226.16(d)(4)(iii) be conducted onsite. **Waiver <u>extended</u> until 30 days after the public health emergency**
Waiver to Allow Reimbursement for Meals and Snacks Served to Young Adults	CACFP	 This waiver allows emergency shelters to claim reimbursement for meals and snacks served to individuals under the age of 25. Reimbursement at the free rate can be claimed for: All reimbursable meals and snacks served to young adults ages 18-24, who reside in an emergency shelter participating in CACFP under section 17(t) of the NSLA; and All reimbursable meals and snacks served to young adults ages 18-24, who receive services from an emergency shelter participating in CACFP as an at-risk center under 17(r) of the NSLA. ** Waiver in effect until the COVID-19 public health emergency is lifted**
Waiver to Extend Unanticipated School Closure Operations	SFSP	This waiver delays transition from SFSP operations during unanticipated school closures associated with COVID-19 to traditional SFSP operations. **Waiver expired on June 30, 2020**
Waiver to Allow Reimbursement for Meals Served Prior to Approval	SFSP	The requirement that reimbursement shall not be paid for meals served at a site before the sponsor has received written notification that the site has been approved for participation in the Program is waived during the public health emergency. **Waiver <u>extended</u> until June 30, 2021**
Waiver to Extend the SFSP Operations	SFSP	This waiver allows the Summer Food Service Program to continue operation through June 30, 2021. **Waiver is no longer in effect**

Meal Pattern Flexibilities	SFSP	The requirement to serve meals that meet the meal pattern requirements is waived during the public health emergency. **Waiver is no longer in effect**
Meal Time Waiver	SFSP	The requirement that meals must follow meal service time requirements is waived during the public health emergency. **Waiver <u>extended</u> until September 30, 2021**
Non-congregate Feeding	SFSP	The requirement that meals be served in a congregate setting and must be consumed by participants on site is waived during the public health emergency. **Waiver <u>extended</u> until September 30, 2021**
Waiver of Onsite Monitoring Requirements for SFSP Sponsoring Organizations	SFSP	For sponsors only – FNS waives that SFSP monitoring requirements included at 7 CFR 225.15(d) be conducted on site. **Waiver <u>extended</u> until September 30, 2021**
Parent Pick-Up	SFSP	Under this waiver, program operators in a state with an approved waiver allowing non-congregate meal distribution during COVID-19 related operations may distribute meals to a parent or guardian to take home to their eligible children. **Waiver <u>extended</u> until September 30, 2021**
Closed Enrolled Site Eligibility	SFSP	Under this waiver, for all states, SFSP and National School Lunch Program Seamless Summer Option (SSO) closed enrolled sites during the COVID-19 public health emergency may determine site eligibility through area eligibility without collecting income eligibility applications. **Waiver <u>extended</u> until September 30, 2021**
First Week Site Visits	SFSP	 (1) FNS waives, for all states, the requirement that SFSP sponsors are required to visit each of their sites at least once during the first week of operation. (2) This waiver applies to state agencies administering and local organizations that have operated the SFSP successfully in the previous year, and SFSP sponsors in good standing that have successfully participated in the CACFP or the National School Lunch Program (NSLP). **Waiver extended until September 30, 2021**
Waiver of Food Service Management Contract Duration	SFSP	This waives, for all state agencies, school food authorities, and SFSP sponsors the food service management company contracts duration requirements at 7 CFF 210.16(d) and 225.6(h)(7). FSMC contracts that may expire by or around June 30, 2021, may be extended through school year 2021-2022 (June 30, 2022). To ensure program integrity during this time, extended FSMC contracts are limited to one-year only. **Waiver is no longer in effect**
Waiver to Extend Area Eligibility for Open Sites	SFSP	FNS waives, for all states, the requirement that SFSP sponsors are required to operate open sites in <i>"areas in which poor economic conditions exist."</i> **Waiver <u>extended</u> until September 30, 2021**
Waiver to Allow Sponsors that Successful Participated in 2019 to Operate as Experienced Sponsors in 2021	SFSP	(1) FNS allows state agencies to use the streamlined experienced sponsor application and approval process for returning sponsors that successfully participated in the SFSP in FY 2019, but not in FY 2020 due to COVID-19. (2) This waiver applies to state agencies administering the SFSP and local organizations that have operated

the SFSP successfully in FY 2019. (3) This waiver relates to 7 CFR
225.2 and 225.7(d)(1)(i).
Waiver <u>extended</u> until September 30, 2021

Transitional Menu Planning Tool

<u>Click here</u> to access the Transitional Menu Planning Tool. The Texas Department of Agriculture developed this great tool for menu planning during COVID. Written for schools, this can also help Child Nutrition Program (CNP) operators as they consider menu and service needs. Start planning now to be prepared for the fall. Service style may change but your menus and products can stay the same. By planning a quality, transitional menu now, you will be prepared for any service style.

The USDA Food and Nutrition Service has released two new Team Nutrition resources that address meal service flexibilities during the coronavirus public health emergency. Regional offices and state agencies are encouraged to share these resources with Child Nutrition Program operators. Both resources are available for download from the Team Nutrition website.

- Child Nutrition Program Meal Service During COVID-19: Best Practices for Parent Pick Up https://www.fns.usda.gov/tn/child-nutrition-program-meal-service-during-covid-19
- Feeding Kids When Schools Are Closed Due to Coronavirus (COVID-19) https://www.fns.usda.gov/resource/feeding-kids-when-schools-are-closed

<u>Click here</u> to access the Nutrition Services Emergency Feeding Vendor Resource List. This resource provides a list of vendors that offer essential supplies including Personal Protective Equipment (PPE), food service, disposable food items and more.

As we practice social distancing and self-quarantine, finding activities and things to do with young children can be challenging. Following are gardening, cooking, and other outdoor activities/resources for families and providers.

- Go to <u>Farm to ECE Resources for At-home Activities</u> for children's books, songs, and free curriculum related to gardening, food, and nutrition.
- Go to <u>Tree Exploration Activity</u> for a specific outdoor activity.
- Go to Gardening and Cooking Songs, Books, and Tips for Families for fun Farm to ECE activities.

Serving Meals in CACFP During COVID-19

Helpful Guide for Meal Planning Alternatives

Use the "Serving Meals in the CACFP during COVID-19" resource to help in menu planning during COVID-19. Whatever challenges you are facing, we recognize that meals served during the pandemic will look different than normal with unique challenges arising. This resource may help in determining alternate meal components during times of food shortage.

FoodCorps Resources to Support Remote Education

FoodCorps shares their <u>COVID-19 Resource Page</u> which includes access to hands-on <u>lessons</u> that are best suited to do with kids at home.

<u>Click here</u> to explore the Captain Planet Foundation's recommended resources for learning at home. Our current situation highlights now, more than ever, the importance of kids understanding how to connect with nature, how to grow their own food, how to build their agency for problem solving, and how to be

an empathetic global citizen. Captain Planet Foundation has pulled together a curated guide of free or low-cost resources for K-12 students to continue learning and explore their environment including live cooking classes with Chef Asata Reid, Life Chef and founder of Feed the People.

Resources for Farm to School and Farm to Early Care and Education

<u>Click here</u> to explore the National Farm to School Network's resources related to COVID-19 that are relevant to the farm to school and farm to early care and education community.

About Head Start and Early Head Start Programs

Excerpted from <a>ECLKC.ohs.acf.hhs.gov

What about wages & benefits for Head Start and Early Head Start staff?

The Office of Head Start (OHS) is directing programs to continue to pay wages and provide benefits for staff unable to report to work during center closures necessary to address COVID-19. This additional emergency response flexibility is important to ensure critical grants management activities can continue during closures. It will help ensure staff are ready and able to return to work as soon as it is possible to resume operations. This flexibility remains in effect through April 30, 2020 unless further extended by OHS.

What can Head Start programs do to support families?

During center closures, employees should continue to engage families and to deliver services to the extent possible, remotely. As for meals, see the prior referenced section on CACFP flexibilities. Head Start and Early Head Start programs may provide meals and snacks to children during center closures.

- Programs could assemble bags of food, including formula for enrolled infants, and deliver them to homes in agency school buses or other agency vehicles. Families could come out to collect the bags or they could be delivered to the door.
- Food could be assembled, and families could pick it up at a center or other location. Care should be taken to avoid large groups and prevent anyone who is sick from coming to collect food. This could include a "drive-through" station in areas where families have cars.
- Programs could check with local schools, churches, or other community organizations to see if there are partnership opportunities to increase the efficiency of food distribution.

FOR FAMILIES: Regarding CAPS

Will CAPS continue to pay my provider if my child is absent?

If your provider is still open, and your child does not attend the program, or if your provider is temporarily closed, CAPS will continue to pay your provider if your child attended at least once since March 1, 2020.

I'm having trouble getting ahold of the documentation needed for my renewal because my work, educational institution, or child care provider is closed. How will this impact my scholarship? If you are having difficulties obtaining adequate documentation for your renewal, let your Family Support Consultant know, and they will work with you to identify how to ensure that COVID-19 related disruptions will not impact your scholarship.

If my provider is closed or if I choose not to send my child to my provider at this time, will I lose my CAPS scholarship?

No, you will not lose your CAPS scholarship if your child care provider is temporarily closed or if you choose to keep your child home. However, if your CAPS scholarship is due for its annual redetermination, you must complete your renewal application on Georgia Gateway (<u>www.gateway.ga.gov</u>) and submit your verification documentation (if available) before the end date of your CAPS scholarship. If you fail to renew your CAPS scholarship, your case may be closed, and you will need to reapply.

Do I still have to pay my provider if my child is absent or if my provider is closed?

If your CAPS scholarship does not cover your child's total tuition, and you usually pay your provider the difference, your provider may expect you to continue to pay that difference. Talk to your provider about their payment expectations for COVID-19 related absences or closures.

Will CAPS continue to pay my provider if my child is absent?

If your provider is still open, and your child does not attend the program, or if your provider is closed, CAPS will continue to pay your provider if your child attended at least once since March 1, 2020.

My child care provider is still open, but I'm concerned that it's not safe for my child to attend the program. How can I be sure that my child is safe at this time?

DECAL is committed to the health and safety of your child. To maintain safe environments during COVID-19, we are asking our providers to take several precautions, including:

- Using proper handwashing techniques
- Frequently cleaning and disinfecting surfaces
- Having sick children and employees stay home
- Limiting classrooms to 10 individuals or less
- Adjusting pick-up and drop-off procedures to encourage social distancing

How do I sign my child in and out of their program while meeting CAPS attendance requirements?

During the COVID-19 crisis, we're waiving CAPS requirement that families sign their child in and out of their program. However, it is essential that your provider knows when your child is dropped off and picked up, so they can know who is in their building during the day. You should drop off and pick up your child with a staff member at the door, and the staff member can sign your child in and out for you. Follow alternate arrival and departure procedures your provider has put in place to adhere to social distancing.

Is CAPS currently accepting new applicants?

Yes, CAPS is currently accepting new applicants. However, applicants must continue to meet our established eligibility requirements. Information on our eligibility requirements is available at caps.decal.ga.gov. Families may apply online at <u>www.gateway.ga.gov</u>.

How do I know if my child care provider or local school system is closed?

Contact your provider or local school system to verify closure. Local news stations will often list school closures. You can also visit <u>www.gadoe.org</u> for information on school closures.

If my local school system closes, can my child go to my child care provider?

If the child care provider is open, has space, and an active scholarship for your child, and the Department of Public Health or your local health department hasn't contacted you and instructed you to isolate at home, your child can attend that program.

What are my options for child care assistance if my child care program is closed, and I need child care to go to work or school?

When you arrange alternative child care for your child(ren), you must submit a *provider change request* as a case change on Georgia Gateway at <u>https://gateway.ga.gov</u>. The alternative provider must be approved to participate in the CAPS program.

If I have a CAPS scholarship, and I am instructed to isolate my child for 14 days, and my child doesn't attend the CAPS child care program, am I still required to pay the CAPS weekly assessed fee?

The family is responsible for paying the family fee to the child care provider if any child is in care; however, you should check with your child care provider about their payment policy when children are absent.

Am I responsible to pay my weekly assessed fee if I am on a temporary layoff because of an employer work stoppage?

You can report a change to your case through Georgia Gateway at <u>https://gateway.ga.gov</u> informing CAPS that you have experienced a temporary layoff. Your family fee may be reduced based on your change in income.

How will my application, renewal, or case change be handled if the due date occurs while CAPS offices are closed?

CAPS will work diligently to complete all applications, renewals, and change requests as quickly as possible. If State offices are closed, or staffing is limited, there could be some delays. Thank you for your patience as we process your application, renewal, or change request.

How would a state office closure impact my renewal that is due?

Renewals are not be impacted at this time because CAPS staff will be available to process renewals remotely. You can help in this process by uploading copies or by using your cell phone to take pictures of your documents and uploading them to Gateway at <u>https://gateway.ga.gov</u>.

How can I submit my renewal application and verification documentation if my local DFCS office is closed?

Families can use their phone or computer to apply for benefits and upload verification documents by taking a picture of their application and documents and uploading them to Gateway at https://gateway.ga.gov.

If I have a CAPS scholarship and my child care provider is not open for business, can I take my child to another child care provider?

Yes, you may take your child to any child care provider who may participate in the CAPS program. If you take your child(ren) to another provider, you must submit a *provider change request* as a case change on Georgia Gateway at <u>https://gateway.ga.gov</u>.

What is the best way to contact CAPS if I have questions related to my CAPS scholarships and/or any adverse actions taken on my case?

CAPS can be contacted by calling 1-833-4GA-CAPS or sending us communication by clicking the "Contact Us" link on our website <u>https://caps.decal.ga.gov</u>.

FOR FAMILIES: General Questions

How can families find the meal sites located in their area or community?

DECAL is getting the word out about where families can find meals for kids during school closures. We're collecting updates from our sponsoring organizations across the state and posting them <u>here</u>. Share the link with your friends to help spread the news that there are opportunities around Georgia for kids to get a healthy meal. Check back often for updates. The USDA's <u>"Meals for Kids" interactive map</u> also directs people to local sites where kids can get free meals. The map will be refreshed and published weekly, as is the normal cycle over the summer. The map is available in English and Spanish at <u>www.fns.usda.gov/meals4kids</u>.

My child is currently not attending child care, but my provider is still charging a weekly fee to hold her spot. Are they allowed to do that?

Tuition and fee agreements are between you and your child care provider and are outlined in the provider's policies and procedures that should be discussed when you enrolled your child. Fees charged during absences should be covered in the program's policies and procedures.

I usually have access to my child's classroom at any time. Can I still expect that?

To reduce the risk of exposure, child care programs now have the option to restrict families' access to parts of the program's facility. Specifically, families may be asked to stop at the front door of the facility or the door of the classroom.

Governor Brian Kemp issued an Executive Order that bans all gatherings of more than 10 people unless the group can always maintain spacing of at least six feet between people. What does this mean for child care programs?

Obviously, caregivers in a child care program must be near the children entrusted to their care. Because child care providers cannot always maintain six feet of distance between people, group sizes must be no more than 10 people, including staff, to follow the order. This means that children in care should be in classrooms in child care learning centers and family child care learning homes with no more than 10 people, including their caregivers.

My child care program usually takes children on field trips when school is not in session. Will they cancel previously scheduled field trips?

To ensure the safety of children, families, staff, and communities, all scheduled field trips should be canceled through April 6, 2020.

My child care provider is doing health checks at drop off every morning. Are they allowed to do that? Some child care providers are doing health checks as children arrive each morning. These health checks could include taking the temperature of each child and adult who enters the building and asking questions about whether the child, or anyone the child has been exposed to, is experiencing fever or cold symptoms. This is just another way to protect the health of your child.

My child's school is closed. Are there any activities we can do at home to help my child continue to learn?

Yes. There are lots of great online resources for home learning activities. Visit our GELDS resource page at: <u>http://gelds.decal.ga.gov/Resources.aspx</u> for a list of activities and resources. Family Connection Partnership has also created a list of family resources and digital learning activities. Go to: <u>https://gafcp.org/coronavirus/</u>.

What can my child and I do to stop the spread of COVID-19?

- Stay home if possible
- Wash your hands often with soap and warm water for at least 20 seconds. If soap and water are not available, use an alcohol-based hand sanitizer.
- Avoid touching your eyes, nose, and mouth with unwashed hands.
- Cover your cough or sneeze with a tissue; then dispose of the tissue in the trash.
- Stay home if you are sick.
- Avoid close contact with people who are sick.
- Get a flu shot.
- Clean and disinfect frequently touched objects and surfaces.

What should I do if my child exhibits symptoms?

Contact your primary care physician's office or your local public health department.

Are there any resources for supporting learning at home while child care and Pre-K programs are closed?

Below are resources by age group. Additional resources will be added as they are developed.

All Ages

• 49 Fun Physical Activities https://activeforlife.com/49-fun-physical-activities-to-do-with-kids-aged-2-to-4/

Toddlers:

- Everyday learning activities for toddlers and three year olds <u>https://www.parents.com/toddlers-preschoolers/development/intellectual/everyday-toddler-lessons/?</u>
- Fun, simple activities to engage your toddler and three year old in learning <u>https://thisreadingmama.com/simple-toddler-activities/</u>
- Fun art, science, math and literacy activities for toddlers and threes https://talkingisteaching.org/
- Great ideas to keep your toddlers busy and learning <u>https://busytoddler.com/category/activities/</u>
- Tons of simple and fun activities to encourage literacy and school readiness <u>https://www.vroom.org/</u>
- 20 learning activities for toddlers and threes that use items easily available around the house <u>https://www.powerfulmothering.com/20-easy-learning-activities-for-toddlers/</u>

Preschool (3 & 4 year olds):

• 25 Indoor Play Activities from a Preschool Teacher

https://www.parentmap.com/article/25-indoor-play-activities-from-a-preschoolteacher

• 20 Indoor Activities besides TV https://theartofsimple.net/20-indoor-activities-for-kids-besides-tv/