

Preparation & Reminders in Child Nutrition Programs

School Year 2021-2022

Program Integrity

State Agencies (SA) have the responsibility of ensuring program integrity at the School Food Authority (SFA) level. This is monitored through the Administrative Review process, technical assistance, reporting, and record keeping.

LEAs and SFAs bear responsibility of being good stewards of the federal money that goes into their programs.

The State Agency (CNU) has the responsibility of monitoring program operations in school districts to assure that program integrity is not being compromised.

- Meal patterns
- Correct counting and claiming of reimbursable meals

COM-22-020: 2021-2022 COVID-19 Guidance for Schools

Food Service and School Meals:

Given the very low risk of transmission from surfaces and shared objects, there is no need to limit food service approaches to single use items and packaged meals. Schools should still establish procedures that maximize physical distance as much as possible when students are moving through the food service line and while eating (especially indoors). Using additional spaces outside of the cafeteria for mealtime seating, such as classrooms, the gymnasium, or outdoor seating, can help facilitate distance.

CNU-21-027- Student Eligibility and eSchool Rollover for SY 2021-2022

DESE recommends that districts rollover the student's eligibility status from SY 2020-21 into SY 2021-22.

Districts should be aware, however, that eligibility for free or reduced student meals is used to determine a student's eligibility to receive Pandemic-Electronic Benefit Transfer (P-EBT). For this reason, schools must make meal applications available to certify children for pandemic meal benefits and to qualify newly eligible children for SY 2021-22 and summer 2022 P-EBT benefits. Applications collected for SY 2021-22 are subject to verification.

DESE will monitor enrollment and eligibility data for each school as well as statewide data to determine if there are significant changes that would necessitate policy considerations regarding funding or school accountability ratings.

Districts must take the following action:

- continue to make meal applications available to families that wish to apply; and notify families of their new status (use letters but include a statement that meals will be provided to students at no charge this school year.
- process direct certification matches after receiving notification of each statewide match.
- Conduct verification on new meal applications.

CNU-22-001 Paid Lunch Equity for Child Nutrition Programs

The Paid Lunch Equity (PLE) tool is used to determine the weighted average price of a paid lunch or the amount of non-federal funds that must be put into the non-profit food service account.

School Food Authority (SFA) having a negative balance in the nonprofit school food service account as of December 31, 2020, will be required to complete the United States Department of Agriculture (USDA) PLE Tool.

School districts with a zero or positive balance are exempt from this requirement but need to retain the APSCN Detailed Revenue Report for period 6/21 (December) showing the balance.

To determine the weighted average price of paid lunches, October for the previous year has historically been used. Schools will use October paid lunch data from 2019 since no paid meals were served during October 2020.

All districts must complete the google form that is embedded in the Commissioner's memo.

Retain copies of all documents for audit purposes.

CNU-21-TBD Reimbursement Rates & Non-Reimbursable Meal Prices

Each year USDA determines the per meal rate of reimbursement for each meal and snack served to students.

For the 2021-2022 school year, district that have opted to do so, may serve meals under NSLP/SBP program and claim the meals at the SFSP higher rate. At this time, all districts in the state of Arkansas have completed the necessary waivers to allow this option.

NSLP/SBP Rates	Breakfast	Severe Need	Lunch	Safety Net	Afterschool Snack
Free		2.35	3.66	3.68	1.00
Reduced		2.05	3.26	3.28	.50
Paid		.33	.35	.37	.09
SFSP Rates	\$2.46	n/a	\$4.31	n/a	n/a

Note that the SPSP reimbursement rates are higher than the NSLP and SBP rates. With SFSP, additional PBR, safety net and severe need do not apply. However, the rates are still higher.

Pricing Non-reimbursable Meals

It is important that federal reimbursement does not subsidize meals that are not reimbursable.

Recommendations for pricing are:

The amount of free reimbursement + the additional 7¢ + the value of USDA donated food

$$3.68^* + .07 + .26 = \$4.01/\text{meal}$$

*The free rate used in this calculation is the Safety Net Rate for the NSLP

Meals included in this are adult meals and second meals to students.

Act 1070 a.k.a House Bill 1783

How does this Act 1070 effect Child Nutrition Programs?

The SMART Snack rules still apply. This did not change any program or any program monitoring the is conducted by DESE CNU.

The times that vending machines may be available remains the same.

The food items available in vending machines remain the same.

The times that vending machines are turned on remains the same.

Act 1070, continued

Monitoring of vending machines will remain the same.

Administrative Review findings

Corrective Action

Withholding payments if corrective action is not submitted to DESE, CNU

CNU-21-TBD Questions and Answers

- **I mark off numbers on a form - is this considered “tick marks”? Will this be allowed?**
No. Tick marks and tally marks are not allowed for SY 2021-2022. In order to maintain program integrity and reduce the number of errors in claiming meals for reimbursement, CNU will require a point of service meal count where the student is identified **by name** at the point a meal is served. Examples of allowed counting and claiming include rosters of computerized point of service meal counts (card scanners, number entry, thumb scanning...etc). Tally marks or numeral meal counts not tied to an individual student are not allowed. CNU recommends using point of sale/service software systems when available.
- **When must we stop using “tick marks”?**
The expectation to complete meal counts where a student is identified by name at the point a meal is served must begin no later than the first day of school in the 2021-2022 regular school year.

USDA Policy Memo SP 15-2021



United States Department of Agriculture

Food and
Nutrition
Service

DATE: June 11, 2021

Braddock
Metro Center

MEMO CODE: SP 15-2021, CACFP 13-2021, SFSP 08-2021

1320
Braddock
Place
Alexandria
VA 22314

SUBJECT: Questions and Answers for Child Nutrition Program Operations in School Year 2021-2022

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Issuing Agency/Office:	FNS/Child Nutrition Programs
Title of Document:	Questions and Answers for Child Nutrition Program Operations in School Year 2021-2022
Document ID:	
Z-RIN:	
Date of Issuance:	June 11, 2021
Replaces:	N/A
Summary:	(1) This memorandum provides clarification on questions related to Child Nutrition Program operations during School Year 2021-2022. (2) This memorandum provides Q&As related to the Nationwide Waivers released for School Year 2021-2022 and applies to State agencies administering, and local organizations operating, the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and the National

USDA Policy Memo SP 16-2021



United States Department of Agriculture

Food and
Nutrition
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Braddock
Metro Center

1320
Braddock
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DATE: July 14, 2021

MEMO CODE: SP 16-2021, CACFP 14-2021

SUBJECT: Previously Issued Questions and Answers Relating to Operation of the Child Nutrition Programs: Updated for School Year 2021-2022

TO: Regional Directors
Special Nutrition Programs
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Replaces:	N/A
Summary:	(1) This memorandum provides clarification on questions related to Child Nutrition Program operations during School Year 2021-2022. (2) This memorandum provides updates to Q&As previously released in Calendar Year 2020 and applies to State agencies administering, and local organizations operating, the National

CNU-21-TBD Child Nutrition Paycheck Protection Program Loans

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 to cover their payroll expenses. Some sponsors have used PPP funds to pay for Child Nutrition Program (CNP) labor expenses. Under certain circumstances, a PPP loan may be forgiven.

- If the PPP loan is forgiven: Any CNP expenses paid for using those forgiven PPP funds may not be claimed using CNP funds since they have already been paid with another source of Federal funding.
- If the PPP loan is not forgiven: CNP funds may only be used to repay that portion of the loan which was used to cover allowable CNP expenses. For any portion of a PPP loan that was used to pay for non-Program expenses, CNP funds may not be used for repayment.

CNU-21-TBD Civil Rights Compliance in Child Nutrition Programs

Q) Is the Nondiscrimination Statement required on informational materials and websites?

A) Yes.

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

A) No, districts should consider how individuals who require meal modifications are accommodated.

Q) For SY 2021-2022, some schools are considering providing meals in the classroom rather than the cafeteria. In those situations, do the schools need to display an And Justice for All poster in every classroom?

A) No. It is not feasible or cost-effective to require that each classroom in a school display an And Justice for All Poster. Instead, schools can display posters in prominent locations throughout the school, such as a bulletin board in the main building entrance, the school office, or another area frequently visited by parents/guardians and children.

Q) Are States required to provide free language assistance?

A) Yes. This includes interpreting and translating critical documents as needed.

CNU-21-TBD Questions and Answers; Meal Service Operations

Can SFAs operate closed enrolled sites and limit enrollment to their own students?

Yes, SFAs operating SSO during the regular school year may decide to operate closed enrolled sites that limit participation to only students enrolled at the school site. The SFA must take a point of service meal count where every student is identified **by name** at the point a meal is served. This includes enrolled on-site and virtual students.

CNU-21-TBD Questions and Answers; Meal Service Operations

Can SFAs operate open or restricted open sites?

Yes, SFA operating SSO during the regular school year may decide to operate as an open site in which any student 18 and under can receive a meal. **The SFA must take a point of service meal count where every student is identified by name at the point a meal is served.**

SFAs also have the option to operate as a restricted open site. These sites allow meal service to enrolled students and preapproved students in the district and/or community. **The SFA must take a point of service meal count where every student is identified by name at the point a meal is served.** Documentation with an explanation of why the SFA is restricting attendance on the basis of security, safety, or control must be kept on file.

CNU-21-TBD Questions and Answers; Meal Service Operations

May students pick up meals at any school within a SFA, or are they required to pick up meals only at the school they attend?

SFAs that implement the Nationwide Waiver to Allow Non-Congregate Meal Service for SY 2021-2022, may permit students to pick up meals at any school within the SFA. SFAs that have elected to implement the Nationwide Parent Pick-up Waiver, may permit parents and guardians to pick up meals for their children at any school within the SFA.

SFAs may also designate one school to be the pick-up site for all virtual meals.

Virtual Meals - SY 2021-22

- Are meals allowed to be served for reimbursement?
 - Yes - for students on a virtual track.
 - Yes - for on-site students sent home to quarantine.
 - No - for students that have went home sick and are considered absent; not receiving instruction.
- How many days of meals are allowed in a meal pack?
 - A maximum of 5 days of meals may be disbursed at one time.
- Do these meals have to meet the meal pattern, including grade grouping requirements?
 - Yes.
- Can we count these students using tally marks?
 - No, The SFA must take a point of service meal count where every student is identified **by name** at the point a meal is served.

CNU-21-TBD Questions and Answers; Meal Service Operations

Can schools operating under the Nationwide Waiver to Allow Non-Congregate Meal Service in SY 2021-2022 through SSO deliver meals directly to students' homes?

Yes. If an 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.

CNU-21-TBD Questions and Answers; Meal Service Operations

If schools schedule a shortened school week, e.g., have classes on Monday – Thursday, may they provide meals for the students to take home for Friday through NSLP/SBP?

Schools may not provide meals on non-instructional days under the NSLP/SBP if they operate under a shortened week, for example where one day of the week is not a “day of operation” that includes school instruction. A “day of operation” that includes school instruction shall mean a day in which classes are in session for all enrolled students.

SFAs operating a 4 day week can serve meals to students on scheduled “days of operation” that include instruction. Scheduled days are considered those days that are part of the regular school year and include all students. On days that do not include all students, meals cannot be served for reimbursement under NSLP/SBP and by extension SSO.

CNU-21-TBD Questions and Answers; Meal Service Operations

May SFAs operating SSO in SY 2021-2022 serve weekend and holiday meals through the SSO?

No. Consistent with supporting a transition back to more traditional school year operations, SFAs may not provide weekend or holiday meals through the SSO when school is in session during the regular school year in SY 2021-2022.

As a reminder, meals may be offered through the [Arkansas DHS Special Nutrition Program](#) which offers CACFP at-risk afterschool meal programs during the school year on days when schools are not in session.

CNU-21-TBD Questions and Answers; Meal Service Operations

May schools operating SSO during the school year sell a la carte food items and beverages?

Yes, schools, may sell a la carte foods and beverages as long as they continue to meet the competitive foods (Smart Snacks) requirements and follow the [Arkansas DESE Rules Governing Nutrition and Physical Activity Standards and Body Mass Index for Age Assessment Protocols in Arkansas Public Schools, October 2020](#), sections 8.00 and 9.00.

CNU-21-TBD Questions and Answers; Water

Are schools required to provide potable water to students eating lunch at school when lunch is served in the classroom?

Yes. Schools are generally required to make potable water available to students during meal service times where meals are served, including in the classroom.

CNU-21-TBD Questions and Answers; Water

Are schools required to provide potable water to students eating breakfast at school when breakfast is served in the classroom?

No. Consistent with SBP regulations for potable water, while water must be made available when breakfast is served in the cafeteria, schools are not required to make water available when breakfast is served outside of the cafeteria. Schools are encouraged to make potable water available in all meal service locations as safety permits.

CNU-21-TBD Questions and Answers; Water

Are schools required to provide potable water to students who are learning virtually due to COVID-19 and who are not eating lunch at school?

No. The requirement that schools make potable water available to students where lunch is served during the meal service assumes that lunch will be consumed onsite.

CNU-21-TBD Questions and Answers; Afterschool Snack

Can the NSLP afterschool snack service operate simultaneously with SSO?

Yes. The NSLP afterschool snack service, which operates during the regular school year, may operate simultaneously with the SSO under the Nationwide Waiver to Allow the Seamless Summer Option through School Year 2021-2022.

CNU-21-TBD Questions and Answers; Afterschool Snack

Who is eligible to receive afterschool snack?

- 1) Students attending instruction on-site must consume afterschool snack on-site accompanied by an enrichment component. This program may only be administered after the school day has ended. If SFAs are interested in serving snacks during the school day, they must be approved to serve during an expanded learning time. 'Expanded learning time' is a common term used in the education arena to describe schools or school districts that add significantly more school time for academic and enrichment opportunities to improve student achievement.
- 2) Snacks may be packed with breakfast and lunch for students that are attending instruction virtually. The education enrichment component has not been waived; therefore, students must be assigned an additional enrichment activity when the snack is being provided.

FIN-22-008: Child Nutrition Emergency Operating Costs Reimbursement

Section 722 of the Consolidated Appropriations Act, 2021 offers additional funds to State Agencies administering the National School Lunch Program (NSLP) and School Breakfast Program (SBP) to provide local operators of those programs with additional reimbursements for emergency operating costs they incurred during the public health emergency.

Local operators administering the school meal program shall receive these funds for estimated shortfalls incurred during the months of March – June 2020.

These funds should be receipted into fund 8056 using revenue code 45556.

All funds are being disbursed upfront and must be liquidated by **January 31, 2022**.

Pandemic EBT (P-EBT) related to SY 2020-2021

**Arkansas P-EBT Client Assistance
Call Center
833-316-2421
Monday – Friday 9 am – 9 pm**

Administrative Review & Procurement Review 21-22

Plans and Information to come.

Claims

17 Districts still have not approved June claims.

If you are from one of those 17 districts, please complete ASAP.

No one can enter JULY until all districts have approved JUNE.

CND will receive an email from Sheila Chastain when July claims are open for submission with instructions on how to proceed.

USDA Questions: Supply Chain

If anyone has had a disruption with supply chain, please contact your Area Specialist at CNU.

Examples of supply chain issues:

- 1% white milk is unavailable
- Truck driver shortages
- Multiple product shortages

Save the Date - Digital Learning:

September 2: 1 - 4pm

October 7: 1 - 4pm

February: TBD

March: TBD

April: TBD