

## Questions and Answers for Home Delivery of Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meals during School Year (SY) 2020-21

To implement home delivery, school food authority (SFA) SFSP and SSO sponsors must submit this completed waiver application to the Connecticut State Department of Education (CSDE). The application must demonstrate that the sponsor will meet the requirements for:

- operating “Open” (area eligible) sites where any child ages 18 and younger can receive meals regardless of if the child is a resident or attends school in the district.
- obtaining prior written consent from parents or guardians for meal delivery.
- protecting the confidentiality of students and their households during meal delivery.

For specific information, see the CSDE’s application form, [Application for Providing Home Delivery for Summer Food Service Program or Seamless Summer Option Meals during School Year 2020-21](#).

If approved by the CSDE, the waiver remains in effect until **June 30, 2021**.



The questions and answers below provide guidance on the requirements for home delivery during SY 2020-21.

### 1. **Can schools that have been approved for non-congregate feeding through the SFSP or SSO deliver meals directly to students’ homes?**

Yes. If the SFA determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with CSDE approval, adherence to all federal confidentiality requirements, and with all necessary federal waiver approvals. Waiver approvals include the: 1) Non-congregate Feeding waiver, 2) Meal Service Time waiver, 3) Parent/Guardian Pickup Waiver, and 4) Area Eligibility waiver (unless the entire community is Area Eligible). Note that more information regarding submitting these waivers will be forthcoming.

Delivery could be completed by mail or delivery service, or hand-delivered by school staff, volunteers, community organizations, or others. Due to student confidentiality and logistical requirements, this option is available **only** to SFA sponsors of **school sites**. SFA sponsors electing to deliver meals must have meal service and distribution sites operating as “Open” prior to providing household meal delivery. SFA sponsors must also meet the requirements to establish meal service times as required by [7 CFR 225.6\(c\)\(2\)\(i\)\(B\) and \(c\)\(3\)\(i\)\(A\)](#). A SFA’s delivery plan with designated times for distribution, when approved by the CSDE, would fulfill the requirements to establish meal service times.

## Questions and Answers for Home Delivery of SFSP and SSO Meals during School Year 2020-21

### 2. **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 SFSP or SSO. Delivery costs could also be paid with non-program funds such as state or local funds, or private donations.

### 3. **Who is eligible to receive home-delivered meals under SFSP and SSO?**

SFA sponsors operating sites authorized for area eligibility may deliver meals to all children 18 years old and younger in their service area.

### 4. **What are the requirements for initiating home meal delivery for a household?**

Schools must first obtain written consent from households of eligible children that the household wants to receive delivered meals. Written consent could include e-mail or other electronic means. In addition, schools should confirm the household's current contact information and the number of eligible children in the household to ensure the correct number of meals are delivered to the correct location.

It is critical that schools protect the confidentiality of students and their households throughout this process. The National School Lunch Act (NSLA) 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 school must be the entity that makes the first contact about meal delivery with the households of eligible children, and must notify the household if contact information will be shared with an external organization, for example, a local non-profit that will provide meal delivery. Once the school receives written consent from the parent or guardian to release contact information, the school may share the information with other organizations involved with meal delivery.

If the school is using a private or public non-profit vendor or any other entity to deliver meals, the regulations implementing the NSLA require the school to have a memorandum of understanding (MOU) with the vendor or third party concerning the confidentiality requirements. The MOU should include information such as what will be disclosed, how the information will be used, how the information will be protected from unauthorized uses and disclosures, and penalties for unauthorized disclosure. For further requirements, see [7 CFR 225.15\(k\)\(1\)-\(2\)](#). To safeguard household confidentiality, the school must ensure data is handled appropriately at all times and by all organizations involved with meal delivery.

## Questions and Answers for Home Delivery of SFSP and SSO Meals during School Year 2020-21

**5. How many home-delivered meals per child may be delivered at one time?**

The maximum number of meals that may be offered to each child remains the same as required by the SFSP or SSO. Sponsors may provide up to two meals, or one meal and one snack, per child per day, in any combination except lunch and supper. The CSDE may approve a distribution approach that includes meals for multiple days, up to one week at a time. The USDA indicates that state agencies should consider the capacity of the SFA to execute such an approach effectively, including meeting state or local food safety requirements.

**6. Do home-delivered meals need to be shelf-stable?**

No. The type of meal offered will depend on the resources and capacity of the site. Sponsors that are able to 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. Home-delivered meals must still meet all meal pattern requirements of the SFSP or SSO unless the CSDE approves a meal pattern waiver request.

**7. Does the child need to be present for home meal delivery?**

No. The student does not need to be present at the time of delivery if the sponsor has: 1) an approved waiver for non-congregate meal service; 2) obtained the household's written consent to deliver meals; and 3) verified the current address. If the meals are shelf-stable, no one need be present, as long as the address has been verified. Sponsors should consider food safety practices, state and local food safety requirements, and best practices regarding temperature control of meals.

**8. If a household has children in multiple schools, can the schools coordinate to provide one home delivery for all children in the household?**

Yes. To the extent feasible, SFAs or schools are encouraged to coordinate their deliveries to make the best use of their resources.

## Questions and Answers for Home Delivery of SFSP and SSO Meals during School Year 2020-21



For more information, visit the CSDE's [Operation of Child Nutrition Programs during Coronavirus \(COVID-19\) Outbreaks](#) webpage or contact the [CACFP staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at [https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/Home\\_Delivery\\_Q&A\\_CSDE.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/Home_Delivery_Q&A_CSDE.pdf).

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

The Connecticut State Department of Education is committed to a policy of equal opportunity/affirmative action for all qualified persons. The Connecticut Department of Education does not discriminate in any employment practice, education program, or educational activity on the basis of age, ancestry, color, criminal record (in state employment and licensing), gender identity or expression, genetic information, intellectual disability, learning disability, marital status, mental disability (past or present), national origin, physical disability (including blindness), race, religious creed, retaliation for previously opposed discrimination or coercion, sex (pregnancy or sexual harassment), sexual orientation, veteran status or workplace hazards to reproductive systems, unless there is a bona fide occupational qualification excluding persons in any of the aforementioned protected classes.

Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Levy Gillespie, Equal Employment Opportunity Director/Americans with Disabilities Coordinator (ADA), Connecticut State Department of Education, 450 Columbus Boulevard, Suite 505, Hartford, CT 06103, 860-807-2071, [levy.gillespie@ct.gov](mailto:levy.gillespie@ct.gov).