



Food and
Nutrition
Service

DATE: October 20, 2020
MEMO CODE: SP 02-2021, CACFP 02-2021, SFSP 02-2021

Braddock
Metro Center

SUBJECT: Reporting of COVID-19 Public Health Emergency Data for Forms FNS-10, FNS-44, and FNS-418¹

1320
Braddock
Place
Alexandria
VA 22314

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:	Reporting of COVID-19 Public Health Emergency Data for Forms FNS-10, FNS-44, and FNS-418
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Summary:	This memorandum is updating the instructions for the remarks section of the FNS-10, FNS-44, and FNS-418 and makes slight modifications to requested information. This collection will capture information on COVID related operations in response to the requirements of the Families First Coronavirus Response Act. This document instructs State agencies to report the number of sites operating during the COVID-19 pandemic by applicable Child Nutrition Program.
Disclaimer:	The contents of this guidance document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

The Federally-declared public health emergency due to COVID-19 created an unprecedented challenge to providing healthful meals to children who normally participate in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and the Child and Adult Care Food Program (CACFP). Through a series of waivers, NSLP/SBP, and CACFP local Program operators were able to continue their mission to provide healthful meals to eligible children using combinations of the flexibilities provided for under NSLP/SBP, CACFP, the NSLP Seamless Summer Option (SSO), and the Summer Food Service Program (SFSP) (Programs).

¹ Pursuant to the Congressional Review Act (5 U.S.C. §801 et seq.), the Office of Information and Regulatory Affairs designated this waiver as *not major*, as defined by 5 U.S.C. § 804(2).

The Food and Nutrition Service (FNS) is asking States to continue to report a small number of additional data elements via their routine monthly data reporting on the FNS-10, FNS-44, and FNS-418 Forms. The reporting process will remain the same which directed States to provide this information through the Food Program Reporting System (FPRS) remarks fields on the specified FNS forms². This memorandum provides instructions for States to continue with this reporting and makes slight modifications to requested information.

State agency staff should report the additional data elements in the FPRS remarks fields on both the 30-day and 90-day reports for each of the Programs (except for July 2020 and August 30-day reports since the deadline has passed reports). The 30-day reports may contain *actual* and *estimated* amounts for additional data elements. The 90-day reports must contain only *actual* amounts for additional data elements.

FNS requests that States implement a few key reporting adjustments to this additional collection for SY 2020-2021:

- 1) **FNS-10: report sites operating under the SSO waiver at school locations and sites located in non-school locations separately.** SSO non-school sites are sites that are sponsored by an SFA but that are not physically located at a school site. The SSO data should continue to be reported on the FNS-10. The number of schools operating traditional NSLP and/or SBP should also be reported.
- 2) **FNS-418: report sites operating under the SFSP waiver at school locations and sites located in non-school locations separately.**
- 3) **FNS-44: Report the number of at-risk centers operating under the *Nationwide Waiver of Area Eligibility in the Child and Adult Care Food Program At-Risk Afterschool Care Component*.** The rest of the FNS-44 data elements remain the same.

Sites that operate more than one type of meal service across the requested data elements should be reported in each applicable field.

Because the remarks fields are unstructured, it is important to make sure that labels for each data element are used consistently across all States. As such, please use the template language below with each entry in the remarks fields. If there are issues with using any/all of this exact language, please ensure all data points are labeled appropriately for FNS to be able to determine what each reported figure represents. The specific data points are listed here, by form. The breakout requested data below is all that is needed. Please refrain from reporting additional information.

² https://fns.usda.gov/sites/default/files/resource-files/SP16_CACFP10_SFSP09-2020s.pdf

Data Requests by Form:

FNS – 10 REMARKS FIELD:

“NSLP/SBP sites offering traditional service _____”

“SSO school sites under Covid-19 waivers _____”

“SSO non-school sites under Covid-19 waivers _____”

FNS – 44 REMARKS FIELD:

Number of center-based sites that

“Center-based sites that offered childcare _____”

“Center-based sites that offered meals only _____”

“Number of center-based sites that offered at-risk meals under the area eligibility waiver _____”

Number of home-based sites that

“Home-based sites that offered childcare _____”

“Home-based sites that offered meals only _____”

FNS 418 REMARKS FIELD:

“Number of school sites under Covid-19 waivers _____”

“Number of school non-sites under Covid-19 waivers _____”

Please also note that States should continue to report meal data as usual on the respective data forms.

FNS appreciates the exceptional effort of State agencies and local Program operators working to meet the nutritional needs of participants during a challenging time. State agencies should direct questions to the appropriate FNS Regional Office.

Sincerely,

Original Signed

Sarah E. Smith-Holmes
Director, Program Monitoring
and Operational Support Division
Child Nutrition Division

Original Signed

Lisa Greenwood
Director, Budget Division
Office of Financial Management