



MEAL SERVICE OPTIONS FOR SCHOOL YEAR 20-21

This resource reflects nationwide waivers and guidance available as of 8/21/2020. This document will continue to be updated as new guidance comes out.

In addition to reviewing possible school schedule models, this resource includes:

- [Possible Meal Service Models](#)
- [Limitations and Considerations for Possible Meal Service Models](#)
- [Child Nutrition Program Waivers Available for School Year 2020-2021](#)
- [Waivers Not Currently Available to Support Child Nutrition Programs](#)
- [Potential Challenges Under Current Waivers](#)

Possible School Schedule Models

Before discussing meal service models, it is important to first understand the context in which those meals might be served. In reviewing various plans for school schedules and operations in the fall, several potential models have emerged for districts to consider:

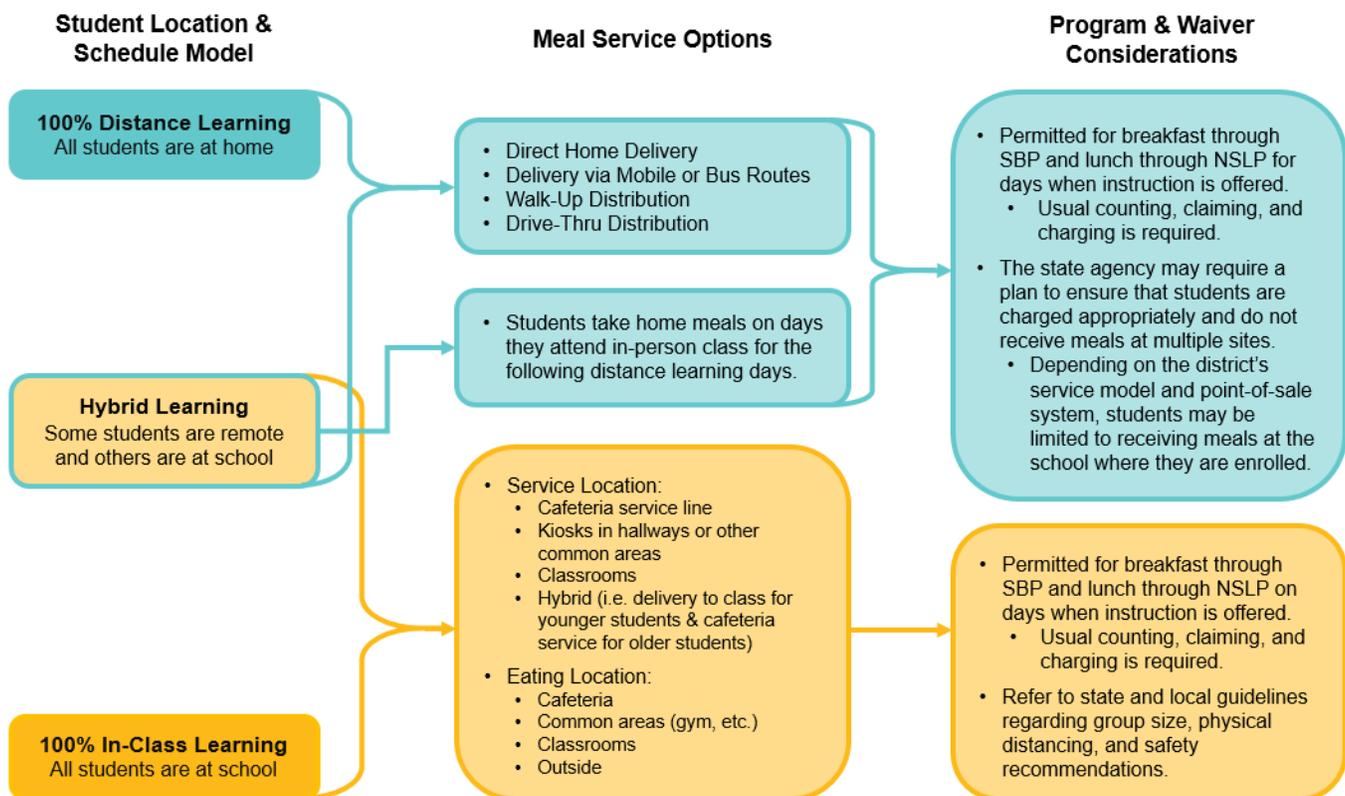
100% Distance Learning	All students learn remotely full-time.
Hybrid Learning	Grade-Level Return Younger students return to school while older students continue distance learning, or vice versa.
	Targeted Return Certain students return to school (e.g. English language learners, students with Individualized Education Programs or IEPs, children of essential workers, etc.) while others learn remotely.
	Alternating Schedule Groups return to school for in-class learning part of the time and then switch off with distance learners. This could be every other day or week, mornings vs. afternoons, or M/W/F one week with T/Th the next.
100% In-Class Learning	All students return to school full-time with enhanced cleaning and distancing protocols.

Each model offers pros and cons and requires additional considerations. For example, in-class learning may come with added costs, especially in crowded school buildings. These districts may also want to be prepared to adopt another model should an outbreak occur within a school or cases in the community surge. Alternating schedules give more students an opportunity for in-person learning while reducing the number of students in school buildings or riding school buses at any one time, but families must navigate a variable schedule. For a targeted return, how schools prioritize who returns to in-class learning may be based on equity considerations or other risk factors, or it could be based on household needs and preferences.

In all cases, district leaders must consult state and local education and health guidelines to determine what is allowable in their area under current conditions. Additionally, they must consult critical stakeholders within the district, including teachers, parents, the school nutrition director, business and operations officials, including those overseeing transportation and custodial staff, and community partners, such as those who provide afterschool programming or care for children of essential workers.

Possible Meal Service Models

For each school schedule model, there are a few options for meal service models.



Limitations and Considerations for Possible Meal Service Models

The school nutrition staff may be limited by several factors beyond just the school schedule. These include:

- **Federal program requirements and available waivers:** Following the applicable rules is critical to ensuring that meals receive federal reimbursements, which is essential to the financial viability of the school nutrition department.
- **School nutrition staff and kitchen capacity:** Preparing meals for students in school as well as meals to distribute or send home to distance learners could require additional staff and/or careful timing and orchestration of tasks. Likewise, packaging or plating meals and serving meals outside of the cafeteria will require additional labor.
- **Equipment, packaging, and technology:**
 - Models like delivering to classrooms or serving from kiosks in common areas may require new equipment such as carts and cooler bags.
 - Outdoor meal distribution during the winter may require tents or heaters.
 - Bags, boxes, or other packaging for in-class meals or take-home meals are an additional cost.

Federal requirements limit school meals and snacks through the National School Lunch Program (NSLP) and School Breakfast Program (SBP) to days when instruction is offered, whether in person or virtually. **If a school has a four-day school week with no instruction offered on the fifth day, meals cannot be served through NSLP or SBP.** The Child and Adult Care Food Program (CACFP) At-Risk Afterschool Meals component may be an option if program requirements can be met. Contact your state education agency for guidance on what qualifies as a day of instruction during virtual learning.

- It may be difficult to offer an acceptable variety of menu items that maintain quality when packaged and delivered.
- Schools distributing meals via drive thru or walk-up as well as schools serving from hallway kiosks may need wireless systems.
- **Transportation:** Delivering meals is an added cost that few school nutrition departments could cover. There may be added challenges if buses are busy transporting students and cannot deliver meals.
- **Teaching staff:** Teachers may not be willing or able to distribute meals within classrooms, maintain the required records, and where necessary, handle charging students who are not eligible for free meals.

Child Nutrition Program Waivers Available for School Year 2020-2021

The USDA has issued or extended several waivers for the **National School Lunch Program (NSLP)**, **School Breakfast Program (SBP)**, and **Child and Adult Care Food Program (CACFP)** that are effective through June 30, 2021 unless otherwise noted below. Waivers for the NSLP apply to the **NSLP Seamless Summer Option (SSO)**.

- **Congregate Meal Service Requirement**
 - This allows students to eat meals off-site and outside of group settings.
- **Meal Service Time Requirements**
 - This allows schools to serve meals whenever it works for the school, including extending service times to accommodate social distancing.
 - Combined with the congregate waiver, this allows schools to:
 - Provide students who are at school for in-person learning with meals to take home for alternating virtual learning days.
 - Distribute meals for multiple days of virtual instruction at one time.
- **Parent or Guardian Meal Pick-Up**
 - For schools distributing meals to distance learners, this allows parents or guardians to pick up meals without their child present.
- **Meal Pattern Flexibility**
 - This allows schools to serve meals and receive federal reimbursement, even if supply chain disruptions prevent them from meeting all meal requirements. School districts must receive approval from their state agency to use this waiver.
- **Offer Versus Serve (OVS) Requirement for High School**
 - This allows high schools to serve bagged, boxed, or pre-plated meals that contain all required components instead of allowing students the option to decline certain items.
 - Schools may continue to implement OVS if they have the capacity to do so safely and correctly, such as incorporating an online ordering system where students can choose their meal components ahead of time. This may reduce food costs and waste.
- **On-Site Monitoring**
 - For school nutrition departments and state agencies administering the school meals programs, all monitoring activities may be conducted off-site through desk audits and other means.
 - For **Summer Food Service Program (SFSP)** and **CACFP** sponsors and state agencies, all monitoring activities may be conducted off-site through desk audits and other means through September 30, 2021.
 - No other element of usual monitoring requirements have been waived.

Additionally, state agencies may submit other waiver requests. As an example, several states have requested and received **waivers** on behalf of school food authorities that had elected Provision 2 last school year and need flexibility in how their claiming percentages are determined.

Child Nutrition Program Waivers Not Currently Available

- **Summer Food Service Program Waivers**

- All waivers related to SFSP currently expire on September 30, 2020. Additionally, SFSP becomes unavailable once school resumes.
- Other than the on-site monitoring waiver, the waivers granted so far for SY2020-2021 do not apply to SFSP. No prior waivers for SFSP (such as area eligibility waivers) will be in effect for the school year. This means that only SSO, *not* SFSP, is available should schools need to close and switch over from school meals to summer meals programs.

The non-congregate waiver for NSLP, SBP, and CACFP stated that planned building closures, whether partial or full, do not count as unanticipated school closures, meaning that **schools and sponsors cannot continue using SFSP or SSO to serve meals once schools reopen for SY2020-2021**, even if schools remain fully remote.

- **Unanticipated School Closure Operations**

- Per [USDA guidance](#), summer meals can only be utilized during unanticipated school closures if no instruction is being provided. If virtual instruction is provided, it is not considered a closure. Furthermore, delaying the start of the school year is not considered an unanticipated closure.
- The option to operate summer meals programs during an unanticipated school closure is available from October through April, so a waiver would be necessary to utilize the summer programs during unanticipated closures that may occur after the school year begins but before October 1, 2020.
- A waiver is necessary in order for schools to operate as SFSP or SSO sites during unanticipated school closures.

- **Afterschool Activity Requirement Waiver for Afterschool Meals and Snacks**

- Without this waiver, sites that serve afterschool meals and snacks are still required to provide enrichment or educational activities on any day that meals are served.
 - Unless the school qualifies as [extended day or expanded learning time](#), the school day does **not** count as enrichment.
- According to [USDA guidance](#), though, virtual programs or take-home activities like enrichment packets **can** fulfill the programming requirement. The activities must be offered to all children who receive meals, but children do not have to participate in order to receive a meal.

Potential Challenges Under Current Waivers

Based on the waivers currently available for SY2020-2021, schools will generally be required to transition back to NSLP and SBP for school lunch and breakfast once the school year begins. This brings up many considerations and challenges for school nutrition departments. Below are a list of challenges, with options for solutions. If you have an innovative work-around for these challenges, please email us at bestpractices@strength.org. We'd love to hear from you!

- **Challenge:** Schools that are not serving universal free meals, whether through the [Community Eligibility Provision \(CEP\)](#) or Provision 2, need to resume counting by name and charging based on fee category (free, reduced-price, or paid meals). Additional considerations related to this include:
 - Avoiding the overt identification of children eligible for free meals may be challenging under many distribution models. Consider implementing counting and claiming measures such as bar codes or student numbers, rather than color coded meal tickets or separating free and reduced students from paid students when receiving meals.
 - Schools distributing meals to distance learners may need to navigate different payments for siblings in the same household if one attends a school covered by CEP but the other does not, or

- if different grade levels have different pricing structures. Communicating clearly with families both in advance and on site can help to mitigate confusion.
- If districts are consolidating students from multiple schools into one building (for example, multiple elementary schools learning within the high school, or all special needs students within a high school building), different payment structures may be a challenge. Consider whether it is possible to streamline or simplify the fee structure for students learning in the same building.
 - *Challenge:* Schools will not be able to continue distributing meals to all children and may only serve meals to students enrolled in the district. This means children or younger siblings who are not yet in school as well as those who attend private or charter schools or are exclusively homeschooled will not be eligible to receive meals. However, districts could share eligibility information and claim meals for students enrolled in other districts. This can help in areas where schools of different grade levels are operated by separate districts.
 - *Challenge:* Districts that do not have the technology or capacity to track students across schools in real time may be required by their state agency to limit schools to serving only their own students. This could be burdensome for parents with children of different ages enrolled in different schools if they have to drive around to multiple schools in order to get meals for their children. Work with your state agency and technology vendor to develop a system that works for children and families in your district.
 - *Challenge:* The school meal patterns with different requirements for age/grade groups could make it more challenging to distribute meals or meal kits to distance learners as well as serve students if multiple grades are consolidated and served within one building. If trying to accommodate different age/grade groups would limit students' access to meals, consider applying for a meal pattern waiver, per the recommendation in Question #10 in the recent [USDA guidance memo](#).
 - *Challenge:* For schools or districts only planning to offer four days of instruction per week, they will not be able to serve meals through NSLP or SBP on the fifth day. Work with your district and state education to determine what counts as a day of instruction. If the fifth day cannot count, consider providing meals through CACFP At-Risk Afterschool along with virtual or take-home enrichment activities.
 - *Challenge:* There will be a more limited role for community partners to support meal service as compared to the immediate response to the pandemic and over the summer when they could fill gaps in service or step in when outbreaks forced school nutrition departments to stop. Without the option to operate SFSP, they will be limited to providing meals through CACFP At-Risk Afterschool when activities are available. However, this is still an important role, especially since CACFP At-Risk allows sites to distribute meals to all children, without needing to be enrolled in the school or district, as long as activities are available.

For more information and resources on back-to-school planning, the Community Eligibility Provision (CEP) and emergency response, visit the No Kid Hungry Center for Best Practices website: bestpractices.nokidhungry.org.

