MEAL SERVICE OPTIONS FOR SCHOOL YEAR 20-21

This reflects nationwide waivers and guidance as of 9/15/2020. It will continue to be updated as needed.

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

- **Possible Meal Service Models**
- **Program Options and Considerations**
- **Child Nutrition Program Waivers Available for School Year 2020-2021**
- **Waivers Not Currently Available to Support Child Nutrition Programs**
- **Limitations and Considerations for Possible Meal Service Models**
- **Potential Challenges Under Current Waivers**

Possible School Schedule Models

Before discussing child nutrition program options and meal service models, it is important to first understand the context in which those meals might be served. Several potential models have emerged that districts may implement, whether they select one for the entire school year or shift between them:

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.
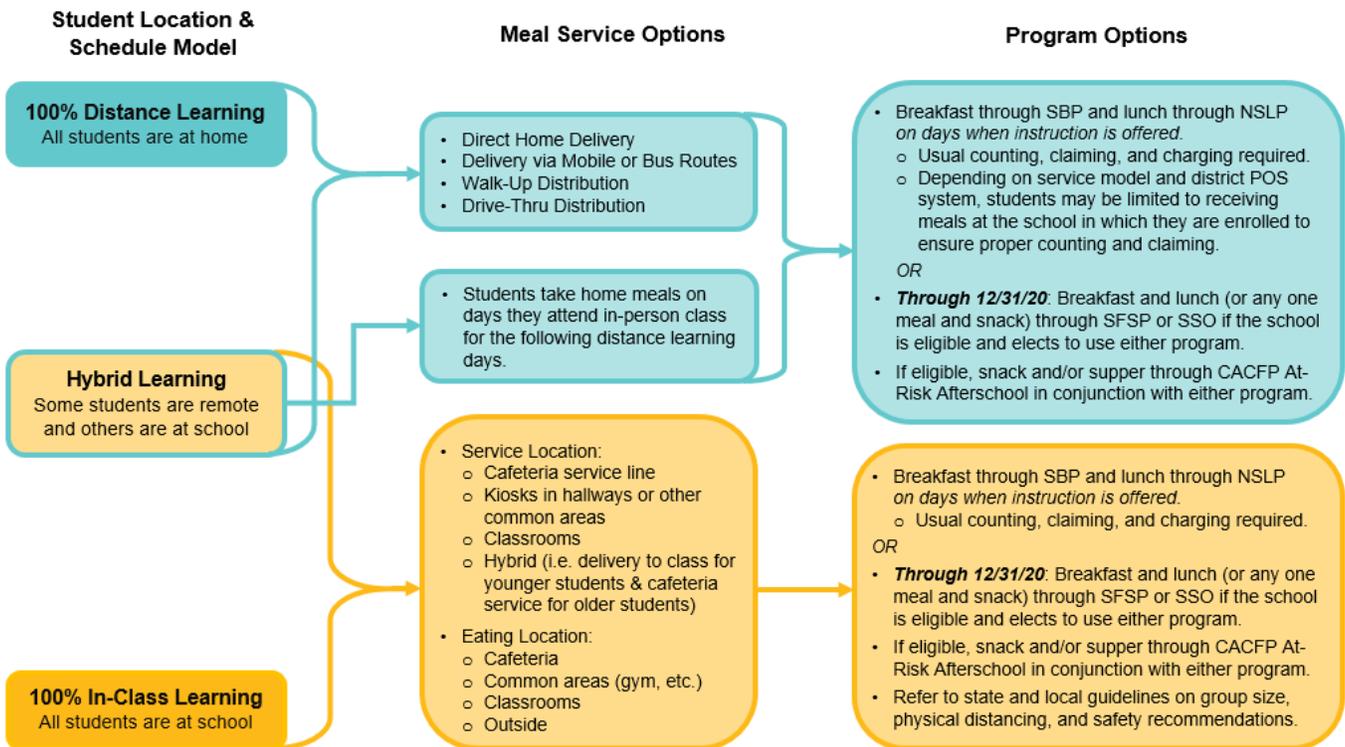
Program Options and Considerations

As usual, school food authorities (SFAs) and schools may serve meals through the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Several waivers, detailed in the next section, are available to help adapt operations to current safety needs and schedule models. However, the usual counting, claiming, and if applicable, charging requirements still apply to these programs, which limits them to students enrolled in the SFA. This is discussed in greater detail in the last section on potential challenges.

As of August 31, 2020, the USDA will give SFAs the option to serve meals through the NSLP Seamless Summer Option (SSO) or Summer Food Service Program (SFSP) during the school year. There are also waivers available to support current safety needs and schedule models.

Additionally, SFAs are permitted, where eligible, to operate the Child and Adult Care Food Program (CACFP) At-Risk Afterschool Meals component in conjunction with either the school meals programs or SFSO or SSO. Non-profit sponsoring organizations also have the option to utilize the SFSP on its own or in conjunction with CACFP At-Risk Afterschool.

> Federal requirements limit school meals and snacks through the NSLP and 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**. Meals could be served through SFSP or SSO regardless of instructional time if the school is eligible and has elected to use the summer meals programs. For schools serving through the school meals programs, the CACFP At-Risk Afterschool Meals component may be an option for the "fifth day" if program requirements can be met, such as area eligibility and providing enrichment activities. Contact your state education agency for guidance on what qualifies as a day of instruction during virtual learning.

SFAs may operate the school meals programs at some schools and either the SFSP or SSO at others according to each school's eligibility and needs. The SFA does **not** need to choose one or the other for all schools.

Schools that started before August 31 and were already serving meals through the school meals programs may switch to either the SSO or SFSP, whether now or later.

Schools starting in September may be able to begin the year serving through SSO or SFSP, or they may start with the school meals programs and then switch later if desired.

> According to COVID-19 Child Nutrition Response #57 and Q&A memo SP 25-2020, meals served through the school meals programs prior to August 31 may instead be claimed and reimbursed through the summer meals programs as long as any students who paid for meals are refunded. Meals served through SFSP prior to receiving written approval may also be reimbursed.

For any SFA wishing to serve through the SSO or SFSP, check with the state agency for the procedure. You may need to submit an application and receive approval, especially if you have not operated SSO or SFSP in the past. Other states may only request notification before starting, although the application may need to be completed or updated by a certain date. At a minimum, the state agency will need updated information on sites and operations.

The summer meals programs include the options for different site types, with these two being most common:

- **Open sites** serve any child age 18 or under on a first-come, first-served basis. Qualifying as an open site usually requires area eligibility, or being within the service area of a school where at least half of students are eligible for free or reduced price meals. There is also an option to use census data. A waiver provides some flexibility on this requirement, but the new guidelines vary by state. A school providing meals as an open site would permit serving meals to students' younger siblings, children not yet in school, and students enrolled in other schools or districts, such as those who attend charter schools.
- **Closed enrolled sites** serve only a pre-identified group of children. Qualifying as a closed enrolled site typically requires the collection of individual income eligibility applications from enrolled children; at least half must be eligible for free or reduced-price school meals in order for the site to serve free meals to all children. A waiver provides some flexibility on this requirement if the site is located in an eligible area.
  - o Typically, summer schools are not permitted to be closed enrolled sites in the summer meals programs. They must either serve children in the community as open sites or serve meals to students only through NSLP. It is unclear how this will be interpreted for this school year and whether schools will be permitted to operate as closed enrolled sites in the SFSP or SSO.

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. On August 31, 2020 the USDA extended waivers for the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO). These are listed and linked separately below due to the earlier expiration date of December 31, 2020.

NSLP, SBP, and CACFP Waivers – Through June 30, 2021

- **Congregate Meal Service Requirement**
  - o This allows students to eat meals off-site and outside of group settings.
- **Meal Service Time Requirements**
  - o This allows schools to serve meals whenever it works for the school, including extending service times to accommodate social distancing.

- o   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**
  - o   For schools distributing meals to distance learners, this allows parents or guardians to pick up meals without their child present.
- **Meal Pattern Flexibility**
  - o   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**
  - o   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.
  - o   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.

SFSP and SSO Waivers – Through December 31, 2020

- **Option to Utilize the SFSP or SSO During the School Year**
  - o   This provides SFAs with the option to utilize either the SFSP or SSO to serve meals, regardless of school calendar or operating status. SFAs are not required to utilize this option, and they may choose to utilize either SFSP or SSO at some schools but the school programs at others.
  - o   This also permits non-profit sponsoring organizations to utilize the SFSP to serve meals, as confirmed by Q&A memo SFSP 14-2020/SP25-2020.
  - o   This permits operators to distribute meals to all children ages 18 and under regardless of school enrollment.
- **Congregate Meal Service Requirement**
  - o   This allows students to eat meals off-site and outside of group settings.
- **Meal Service Time Requirements**
  - o   This allows sites to serve meals whenever works best, including extending service times to accommodate social distancing.
  - o   Combined with the congregate waiver, this allows sites 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 at one time.
- **Parent or Guardian Meal Pick-Up**
  - o   For schools distributing meals to distance learners, this allows parents or guardians to pick up meals without their child present.
- **Meal Pattern Flexibility**
  - o   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 Flexibility for Non-Profit SFSP Sponsors**
  - o   This gives non-profit sponsors the option to utilize Offer Versus Serve (OVS).
  - o   It provides guidelines for implementing OVS if the sponsor has the capacity to safely do so.

- **Area Eligibility**
  - This allows open site locations that do not meet the usual area eligibility threshold of being within a school attendance zone or census block group where at least half of students are eligible for free or reduced-price meals.
  - States may amend their area eligibility waiver plan to include new areas as necessary in order to provide benefits to areas determined to be in need.

- **Option for Area Eligibility for Closed Enrolled Sites**
  - This allows closed enrolled sites the option to utilize area eligibility in order to determine eligibility to offer free meals.

- **First Week Site Visit**
  - Waives the requirement for sponsors to visit sites during their first week of operation if those sites participated successfully in the summer meals programs during the prior year or participate successfully in either the NSLP or CACFP.

Monitoring Waivers

- **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 through June 30, 2021.
  - 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. Several states have also received waivers allowing alternate sites for the Fresh Fruit and Vegetable Program (FFVP) and allowing parents or guardians to pick up produce served through the FFVP.

Child Nutrition Program Waivers Not Currently Available

- **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.

- **Area Eligibility for CACFP At-Risk Afterschool**
  - Sites may be eligible for SFSP or SSO under a state's area eligibility waiver, but area eligibility requirements still apply to CACFP At-Risk Afterschool: the site must be within the attendance zone of a public school where at least half of students are eligible for free or reduced-price meals.
  - This waiver has not been available at any point during the COVID-19 response.

- **Unanticipated School Closure Operations**

  Note: these guidelines and restrictions will only be a concern after the current summer meals waivers expire on December 31, 2020. Until then, SFAs have the option to utilize the summer meals programs regardless of the school calendar or operating status.

  - The non-congregate waiver for NSLP, SBP and CACFP states that planned building closures, whether full or partial, do not count as unanticipated closures.
  - Additionally, 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.
  - A waiver is necessary in order for schools to operate as SFSP or SSO sites during unanticipated school closures.

Limitations and Considerations for Possible Meal Service Models

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

- 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.
  - It may be difficult to offer an acceptable variety of menu items that maintain quality when packaged and delivered.
  - Schools providing meals through the school meals programs outside the cafeteria may need wireless systems in order to accurately count, claim, and charge students for meals.
- 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.

Potential Challenges Under Current Waivers

Despite the recent waiver extensions and option to utilize the summer meals programs, there are still 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!

For Schools Continuing to Operate Under the School Meals Programs

- *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.

- o 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.
  - o 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.
  - o Districts may 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.
  - o If eligible, consider serving meals through the SFSP or SSO. If not, equip sites to refer families to the closest open summer meals sites or other resources. Tools like No Kid Hungry's texting hotline (text "food" or "comida" to 877-877) can help.
- *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.
  - o 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.
  - o 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.
  - o If the fifth day cannot count, consider providing meals through CACFP At-Risk Afterschool along with virtual or take-home enrichment activities. Area eligibility requirements apply.
  - o Or, take advantage of the option to serve meals through SFSP or SSO since meals may be served seven days per week regarding of school calendar or operating status.

For Schools Operating Under the Summer Meals Programs
- *Challenge*: Messaging the transition back to the summer meals programs may be confusing for families if the school year has already begun through the school meals programs, or if some schools will operate under the school meals programs and others under the summer meals programs.
  - o Provide clear and thorough information through all school communication channels (e.g. social media, emails, text messaging, robocalls, websites, on-site posters, etc.) about what is permitted and which schools are offering which meal options.
- *Challenge*: Some school nutrition departments may have trouble getting timely district approval to switch programs, especially if there are concerns that the USDA could run out of funding.

- o Emphasize the financial benefits and administrative ease of operating through the summer meals programs, including the higher reimbursement through SFSP and elimination of the risk of unpaid meal debt.
  - o Provide the most recent USDA Q&A guidance, which notes that the USDA will provide advance notice if funding for the summer meals waivers is projected to run out before December 31 and will reimburse meals up to the end date announced in advance.
- *Challenge:* With meal charges not tied to returning income eligibility forms, it may be more challenging to persuade families to return them. This may be problematic in districts that rely on free or reduced-price eligibility for other benefits, like free or reduced-price fees for other services or activities. It may also be challenging when schools have to switch back to the school meals programs.
  - o Emphasize the many benefits of completing and returning the form. Depending on your state or district, that could mean more state education funding, reduced athletics fees, or free technology.

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.

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