Emerging Strategies and Tactics for Meal Service During School Closures Related to the Coronavirus

This document was last updated on 3/31/2020 and will continue to be updated.

For background information on program options for serving meals during school closures related to the coronavirus, including guidance related to nationwide waivers, see this FAQ.

Always communicate with and receive approval from your state agency prior to implementing non-congregate meal service or any new strategy in order to ensure compliance and reimbursement.

State agencies are likely to be very busy at this time. We encourage partners to offer to support their state agency, which will allow for a coordinated response and consistent messaging.

State Agencies

- Inform your USDA regional office that you elect to opt in to current nationwide waivers:
  - Congregate meal service across all child nutrition programs (National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, Summer Food Service Program and Seamless Summer Option).
  - Meal service time requirements across all child nutrition programs.
  - Enrichment programming requirements in the NSLP Afterschool Snack Program and CACFP A-Risk Afterschool Meals component.
  - Meal pattern requirements across all child nutrition programs.
  - Requirement for children to be present for meal pick-up.
  - Community Eligibility Provision (CEP) deadline extensions.
  - On-site monitoring, reviews, and site visits.

- Work collaboratively with program operators to develop practical guidelines for ensuring integrity when distributing meals to parents on behalf of their children, such as easily accessible forms of documentation that parents could show. Or, defer to operators to develop their own plans.

- Submit requests to USDA for additional waivers from federal requirements as needed, such as administrative or record keeping requirements or area eligibility requirements for SFSP, SSO, and CACFP At-Risk Afterschool Meals.
  - More than 30 states have already been approved for waivers from the area eligibility requirement for open sites in the SFSP and SSO.

- Share as soon as possible any information regarding the status of waiver requests sent to the USDA.

- Share with all program operators any guidance and procedures related to submitting waiver requests, application updates and/or plans for implementing waivers.
Consider systems and procedures that would make it as simple as possible for as many operators to take advantage of needed waivers.

Aside from the meal pattern waiver, which explicitly requires a case-by-case review and approval, the USDA has not required states to approve individual waiver requests in advance of their use.

- Consider holding regular conference calls for program operators to hear updates, share information, and support coordination.
- Post information about waivers and waiver request procedures in a central place on your website if possible so that operators do not have to rely on seeing and saving email communications.
- Facilitate communication and coordination among school food authorities and non-profit sponsoring organizations to maximize reach and support for families while minimizing duplicative services.
- Work with partner organizations to promote approved meal distribution sites.
  - Share data to populate maps or other tools, like state or local 211 or 411 service or No Kid Hungry’s texting hotline (Text ‘FOOD’ or ‘COMIDA’ to 877-877).
- Work with your peers who administer SNAP in your state to develop and submit a plan for adopting and implementing Pandemic EBT (P-EBT) for students affected by school closures by five or more days.

**Staffing & Meal Preparation**

- **At this time, all health, safety, and sanitation requirements apply.**
- Develop a plan for communicating with staff during school closures.
  - Consider holding a nightly conference call for all staff working each day to address concerns and continue improving operations for the next day.
- Assess staff ability to work during school closures. Some staff may not be available if they need to care for children dismissed from school, if they are part of a high-risk group, or if they need to care for someone in a high-risk group (e.g. persons over age 60 and person with pre-existing health conditions).
  - Allow staff who are not able to work on site to provide support remotely when feasible. Tasks could include supporting outreach and communications, coordinating with partners, responding to inquiries, managing a meal pre-order system, and for school staff, contacting families to arrange home deliveries.
- Create employee carpools to ease a transportation issue. Mass transit should still be available for essential workers but may be running less frequently.
- Consider soliciting help from other employees within your organization who may not otherwise have work, such as bus drivers, afterschool activity providers, or coaches.
• Consider soliciting help from volunteers to support tasks like counting or bagging packaged items, especially if these tasks can be done from a central kitchen where the need for background checks may be mitigated.

• If short-staffed, particularly for long periods of time during extended closures, look into hiring restaurant or food service employees who may be experiencing lost work or hours.

• If current kitchens or vendors are unable to meet demands, consider other food service management companies that may have capacity due to school closures as well as private restaurants or caterers that may be able to support efforts.
  o The USDA said in COVID-19: Child Nutrition Program Response #4 that non-competitive proposals are permitted during emergency situations.
  o Communicate with your state agency to confirm appropriate procurement procedures and documentation in this situation.

• Maintain staff safety as a top priority:
  o Ensure that staff understand the importance of not coming to work while sick or under self-quarantine due to possible exposure.
    ▪ Remind staff that they may still transmit COVID-19 without or before developing symptoms, which can take up to 14 days from the time of exposure to the coronavirus that causes COVID-19.
  o Encourage frequent handwashing for at least 20 seconds each time. Allow staff to take needed time for handwashing after sneezing or touching their phone or face. Refer to the Centers for Disease Control for guidance and resources.
  o Regularly sanitize hard surfaces, especially high-tough surfaces like door knobs and surfaces in high-traffic areas.
  o Allow staff to stay distanced during meal preparation to the greatest extent possible by spacing out work stations and limiting how many people need to access shared spaces like storage areas or equipment like refrigerators.

Meal & Menu Options

• At this time, all meal pattern requirements apply to each child nutrition program unless your request for a waiver is approved in advance.
  o Communicate with your state agency if you experience difficulty sourcing any meal components. State agencies have been directed to consider waiver requests when there are issues of supply and availability.

• Options include, and may be a mix of:
  o Hot meals
  o Cooked meals served cooled along with instructions for reheating
  o Cold meals
  o Shelf-stable meals
• Providing meal ingredients or groceries would **not** count as reimbursable meals. Unless approved by your state agency, assume that meals must be complete and unitized.

• Post or send home food safety instructions for storing meals or meal components.

• If your state agency has opted into the nationwide waiver of meal service time restrictions and allows sites to provide more than one meal or snack at the same time, consider serving a hot meal along with a cold or shelf-stable breakfast for the next day.

**Meal Distribution**

• Where possible, find known and trusted staff members to support meal distribution.
  - For schools, this may include cafeteria workers who serve kids during the regular school year, bus drivers, principals, school secretaries, coaches, and when and where available, teachers or teachers’ aides.
  - For community locations, this may include afterschool programming staff, librarians, faith leaders, or other trusted community members.

• If permitted by your state agency, consider distributing meals for more than one day at one time to minimize exposure and ease transportation barriers families may face.
  - The USDA permits delivery of meals for up to one week at a time through SFSP or SSO (see **Q5**).
  - If this requires too much storage or staff capacity, consider establishing different pick up or delivery days for different groups, such as families with last names A-E on Monday, last names F-J on Tuesday, etc.

• Consider methods that limit crowds and allow for adequate social distancing (i.e. six feet of space between individuals). These include:
  - Drive-through or curb-side pick-up.
    - If possible, ask families to open their trunk from inside their vehicle and place the meal in the trunk rather than hand it directly to them.
    - Or, place meals on a table and then have families pull forward to collect the meal from the table rather than handing off the meal.
  - Mobile routes or delivery along school bus routes, which may minimize the number of people coming to each distribution point. This may also be easier for families and children with transportation challenges.
    - Consider utilizing a known schedule for bus routes, such as a late start school day schedule.

• If significant numbers of kids or families will access a meal distribution site without a vehicle, develop a plan for keeping workers and families at least six feet apart:
  - Put traffic cones, tape, or chalk marks on the ground to show how far apart groups should wait.
  - Place meals on a table and have each family approach the table to collect them, or use a serving tray to pass meals to families.
o Take meal counts at a distance.

o If necessary to limit crowds, lengthen the amount of time for meal pick-up or establish staggered meal service times or days, such as families with last names A-E on Monday, last names F-J on Tuesday, etc.

o For staff comfort, consider setting up a table just inside the door of a building and serving meals across the table through the open door, rather than requiring everyone to be outside.

- School food authorities may be able to deliver to homes with state agency approval.
  
o Home delivery requires written consent from the parent or family to be obtained by the school. Consent may be provided electronically.

  o Meals may be delivered to all children within an eligible area. If a school is not area-eligible, meals may be delivered to enrolled students who are eligible for free or reduced-price school meals. All students attending CEP, Provision 2, or Provision 3 schools are eligible for delivered meals.

  o In order to work with another organization to provide delivery, the school must obtain written consent from the parent or family to share their contact information.

  o Schools working with a private vendor for delivery must have a signed memorandum of understanding regarding confidentiality of student data.

  o With approval and necessary waivers on time restrictions, meals for multiple days (up to one week) may be delivered at one time once the number of eligible children in the house has been verified and daily maximums are kept (i.e. no more than one breakfast and one lunch per child per day).

  o For more information, see the USDA’s guidance at https://www.fns.usda.gov/sfsp/covid-19-meal-delivery.

**Record Keeping**

- **Unless otherwise directed by your state agency, all usual record keeping requirements apply to each child nutrition program**, including attendance for CACFP operators as well as menus and meal count records for all programs.

- Under most usual circumstances and for most SFSP or SSO sites types, it is **not** required to record names for attendance or meal counts.

  o Doing so **may** be necessary as part of your plan with your state agency for:

    ▪ Distributing more than one meal at a time (e.g. a breakfast for the next day or lunches for several days at a time);

    ▪ Distributing a meal to an adult without a child present; or

    ▪ Serving meals at a site that does not qualify as area-eligible such that it cannot offer free meals to all children ages 18 and under.

  o If names are collected, children must **not** be overtly identified as eligible for free or reduced-price school meals.
If staff new to working on child nutrition programs, volunteers, or other community partners are assisting with meal delivery, ensure that they receive training on properly documenting meals served for claiming purposes.

Schools’ usual systems for recording meal counts, such PIN number entry or swiping student IDs, may be helpful and allowable. If children or their parents are touching a PIN pad or other terminal, have a plan for sanitizing it between uses.

**Communication**

- Post clear and up-to-date information on the website for the sponsoring organization or school food authority as well as each meal distribution site, where available.
  - Include information like how many meals will be distributed at once, whether children need to be present, or if a child does not need to be present, what information or documentation is needed to verify that the adult is the parent or guardian of an eligible child.
- For schools, consider using text message or robocall services to reach parents.
- Use social media to promote the availability of meals and share updates.
- Provide information to the local news media to help promote the availability of meals and sources of information for details and updates.
- Post clear signage and information at sites to help children and families locate the exact place and procedures for meal pick-up.
  - Consider large banners or sandwich board signs to direct people to open sites.
  - As needed, post multiple signs with arrows directing families to right location, or use sidewalk chalk or tape.

**Partnerships and Additional Services**

- Partner with another sponsor or school so that one organization provides breakfast and lunch through SFSP or SSO and the other provides a supper and snack through CACFP At-Risk Afterschool. USDA guidelines allow multiple organizations to operate out of one location during emergencies.
- Work with a food bank or pantry to distribute groceries or other household supplies to parents and families during the same time as meals are being distributed.
  - This may be particularly helpful as an alternative if adults request meals on behalf of their children without having the needed documentation or verification that they have an eligible child at home.
- Post or provide information about other resources or support services that may be available in your community, or provide the number for the National Hunger Hotline: 1-866-3 HUNGRY and 1-877-8 HAMBRE (1-866-348-6479 and 1-877-842-6273).
  - The hotline refers people in need of emergency food assistance to food pantries, government programs, and other organizations.