



Emerging Strategies for Child Nutrition Program State Agencies to Support Meal Service During the Coronavirus

This document was last updated on 4/30/2020 and will continue to be updated.

Current Nationwide Waivers

Inform your USDA regional office that you elect to be subject to all 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 (extended to September 30 for SFSP and SSO).
- Enrichment programming requirements in the NSLP Afterschool Snack Program and CACFP At-Risk Afterschool Meals component.
- Meal pattern requirements across all child nutrition programs (extended to May 31).
- Requirement for children to be present for meal pick-up.
- Community Eligibility Provision (CEP) deadline extensions.
- On-site monitoring, reviews, and site visits as well as monitoring requirements for the CACFP.
- Claim submission deadline extension for January and February 2020.
- Previously rescinded nationwide SFSP waivers:
 - First week site visits
 - Area eligibility in lieu of individual applications for closed enrolled sites
 - Offer versus serve (OVS)
- Deadline to complete triennial local wellness policy compliance assessment.
- Contract duration limits for food service management company contracts set to expire on or around June 30, 2020.
- Unanticipated school closure operation limitations in SFSP or SSO.

Additionally, collaborate 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. Consult our [FAQ on P-EBT](#) for more information.

Additional Waivers

Submit requests to your USDA regional office for additional waivers from federal requirements where nationwide waivers are not available.

- States have already requested and been approved for waivers from the area eligibility requirement for open sites in the SFSP and SSO.
- Other state-requested waivers include:
 - Extensions on deadlines for claims for reimbursement for March 2020 and beyond, other reporting requirements, appeals, etc.
 - The requirement that for-profit child care centers participating in the CACFP may only submit a claim for reimbursement in months where at least 25 percent of their enrolled children eligible for free or reduced-price meals. This may be a challenge as centers transition to providing care only for essential workers.
 - The area eligibility requirement for CACFP At-Risk Afterschool Meals sites.

Waiver and Guidance Implementation

- Share with program operators as soon as possible any information regarding nationwide waivers and the status of waiver requests sent to the USDA.
 - Post information about both pending and approved waiver requests on your website.
 - Share [USDA Q&A guidance](#) on implementation of the waivers, specifically highlighting valuable information for program operators:
 - Operators may provide some items in bulk rather than serving fully unitized meals only.
 - CACFP operators may distribute meals for more than one day at a time.
 - CACFP operators may implement direct home delivery.
 - Sponsors may operate SFSP or SSO at the same time as CACFP At-Risk Afterschool as long as different meals are served.
 - Operators may continue providing meals through SFSP or SSO on or for scheduled non-school days during the broader school closure, even if those days are not considered postponed or cancelled.
 - Weekend meals are reimbursable through SFSP or SSO during school closures.
 - Work collaboratively with program operators to develop practical guidelines for ensuring integrity when distributing meals to parents on behalf of their children, such as:
 - Allowing parents to show some form of documentation, but providing multiple options that are easily accessible, including digital options, like an email from their child's school, a student ID card, or a report card; or
 - Asking parents to name which school or child care center their child attends; or
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- Emailing a code to parents to use when picking up meals on their child’s behalf; or
- Posting signs to notify families that meals are only for children ages 18 and under; or
- Defer to operators to develop their own plans based on their knowledge of the community.
- Share with all program operators any guidance and procedures related to submitting waiver requests, application updates and/or plans for implementing 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 systems and procedures that would make it as simple as possible for as many operators to take advantage of needed waivers. For example, rather than individually reviewing and confirming emails, create a dedicated email address for waiver notifications that sends an auto-response acknowledging receipt.
- Post information about waiver request and implementation procedures in a central place on your website if possible so that operators do not have to rely on seeing and saving email communications.

Communication and Promotion

- Host regular conference calls or webinars for program operators to hear updates, share information, and support coordination.
 - Follow up with a recording, notes, and/or links to where relevant information is posted on your website.
- Facilitate communication and coordination among school food authorities and non-profit sponsoring organizations to maximize reach and support for families while minimizing duplicative services.
- Share information on relevant state legislation, like the availability of state funding to supplement the federal reimbursement rate or to pay for school buses to deliver meals.
- 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).
 - If interested in sharing site data with No Kid Hungry, contact Emily Pia at epia@strength.org.

Staff Safety and Contingency Planning

- Urge operators to take safety precautions seriously, both for their staff and for the public, when planning for meal preparation and distribution.
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- See [Emergency Planning and Staff Safety Tips](#) for ideas.
- Advise operators to develop back-up plans should staff members test positive for COVID-19 and their locations need to be shut down.
 - If possible, identify operators and/or vendors with untapped capacity who could step in should a sponsor or school division need to cease operations.
 - If needed, solicit help from No Kid Hungry or another anti-hunger organization in your state to help identify operators or vendors who can help fill gaps.
- Urge operators to develop a plan for rapid communication should staff members test positive for COVID-19 and operations change.

Summer and Future Planning

- Encourage school districts to run direct certification reports frequently in order to maximize identified student percentages for the Community Eligibility Provision for School Year 2020-2021.
- Encourage program operators to assess their finances and communicate proactively if they will need to reduce staffing or meal service operations so that other operators may be identified to fill gaps.
- Urge program operators to provide advance notice to you and to families if they intend to close an underutilized site so that those families can be referred to other sites or resources.
- Determine whether usual SFSP/SSO application deadlines need to be adjusted.
 - Per COVID-19 Child Nutrition Response #21, the federal application deadline of June 15 has been waived, and unanticipated school closure operations may continue through June 30, 2020 in order to allow more time to process applications.
- Develop plans for approving returning SFSP/SSO sponsors and new sponsors.
- Transition required training to online platforms or webinars.
- Communicate proactively about summer plans and deadlines with organizations currently providing meals through SFSP or SSO, sponsors from last summer, and prospective sponsors and the general public.
- Reach out proactively to schools in order to assess their intention to continue operating over the summer break so that non-profit organizations have time to plan to scale up as needed.
- Urge SFSP and SSO sponsors to plan for both scenarios of current waivers being extended and current waivers expiring on June 30, 2020.

