

Guide to Ensuring Children Have Access to Nutritious Meals During COVID-19 School Closures

Advocates, school districts, out-of-school time program providers, and community partners have an important role to play in mitigating the impact on families who rely on school meals to keep hunger at bay during COVID-19 school closures. Partners can leverage federal resources, such as the summer nutrition programs, school meals programs, afterschool nutrition programs, and Pandemic Electronic Benefit Transfer (P-EBT), to ensure students have access to the nutrition they need during this time.

FRAC has created this guide to share the options available to school districts and community partners to serve meals, answer commonly asked questions, and share best practices. Schools and nonprofit sponsors should consult with their <u>State child nutrition agency</u> prior to serving meals in order to ensure that the meals are eligible to be reimbursed. *This guide is based on information available as of April 20, 2020. FRAC will continue to update this document as things evolve.*

I. Opportunities to Provide Meals Through the Child Nutrition Programs II. Nationwide and State Waivers to Ensure Access to Meals III. Best Practices to Serve Meals During School Closures IV. Pandemic EBT (P-EBT)

Ensuring Children Have Access to Nutrition (COVID-19) | FRAC | April 21, 2020 $\ensuremath{\mathbb{C}}$ | 1

I. Opportunities to Provide Meals Through the Child Nutrition Programs

Summer Nutrition Programs

The Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO) through the National School Lunch Program (NSLP) are available to provide meals during unanticipated school closures. Schools and other summer food sponsors (which can include local government agencies and private nonprofit organizations) should consider providing meals. There is room to expedite approving sites. Meals can be provided to all children at sites in areas where 50 percent or more of students are eligible for free or reduced-price meals (using either census or school data), and the U.S. Department of Agriculture (USDA) has granted waivers to some states to provide meals at sites that do not meet the 50 percent requirements. If a location is **not** area eligible, schools are still able to participate if they more directly target households with children who are eligible for free or reduced-price meals.

- **SFSP** is available for schools, local government agencies, and private nonprofit organizations to feed children during unexpected school closures. All non-school sponsors must serve meals through SFSP.
- **SSO** is another option for schools that operate NSLP. SSO operates similar to SFSP, but with less administrative work because the school is not switching to a different child nutrition program. For example, meals are claimed through the same process as they would be for school meals. Schools continue using the same meal pattern used during the school year. Schools that use SSO also are reimbursed at the school lunch and breakfast free reimbursement rates, which are slightly lower than SFSP. Find the current reimbursement rates for SFSP and SSO <u>here.</u>

Things for School Districts to Consider When Choosing Between SFSP and SSO

If schools have not previously operated the Summer Nutrition Programs but want to start serving meals during school closures, they should consider applying through SSO. As SSO operates through NSLP and is aligned with normal school year operations, it is more likely that schools will be able to be approved quickly and begin providing meals.

If schools have operated either SFSP or SSO previously, and have an existing agreement with the State agency, they should consider implementing the same program during school closures.

School Breakfast Program (SBP) and NSLP

An additional option for schools is to provide meals through NSLP and SBP if the school district considers schools to be open (even if the building is closed). Schools claim and are reimbursed for meals based on the eligibility status of the individual student. USDA issued a nationwide non-congregate waiver for NSLP and SBP, but other NSLP and SBP requirements would still apply. As with all of the child nutrition programs, State agencies can request additional waivers to ensure access to meals through NSLP and SBP. See question #9.

Child and Adult Care Food Program (CACFP) At-Risk Afterschool Meal Program

Sponsors and sites participating in CACFP may continue service during school closures. With State agency approval, sites that normally offer a snack and supper after school through the CACFP At-Risk Afterschool Meal Program may instead choose to offer either lunch and a snack, or breakfast and a snack. These meals and snacks are reimbursed through CACFP at the free rate. Child care centers and homes that remain open —or those that reopen to become emergency child care centers for essential workers — may continue to provide two meals and a snack.

Operating Multiple Programs Simultaneously

USDA has provided guidance that sponsors may operate both SFSP/SSO and the CACFP At-Risk Afterschool Meal Program at the same time during unanticipated school closures. The two programs have to be serving different meals and not exceed the number of meals and snacks allowed per child, per day, per program. Additionally, sponsors can work together to provide three meals and a snack per day at one site through SFSP/SSO and the CACFP At-Risk Afterschool Meal Program. For example, a school district may be able to provide breakfast and lunch, and a community sponsor would provide a supper and snack through CACFP.

II. Nationwide and State Waivers to Ensure Access to Meals

To provide meals in a way that supports social distancing and addresses the urgent crisis, schools and sponsors will need to use waivers to meet the nutritional needs of the children in their communities. The Families First Coronavirus Response Act gave USDA-FNS the authority to issue nationwide waivers that states can opt into. Prior to implementing any of the waivers, school districts and community organizations should receive approval from their State agency in order to ensure that the meals served will be reimbursed. Unless otherwise noted, all of the nationwide waivers listed below are in effect until June 30, 2020.

- **Non-Congregate Feeding:** Allows meals to be provided outside of a congregate feeding setting. Meals can be distributed at a site where families pick up the meals, as well as be delivered to children's homes. USDA has provided additional guidance on meal delivery. The state child nutrition agency needs to sign off on the distribution model. The waiver applies to SBP, NSLP, SFSP, and CACFP.
- **Meal Service Times:** Provides flexibility to the meal service time requirements. The waiver applies to SBP, NSLP, SFSP, and CACFP.
- Activity Requirement in the Afterschool Nutrition Programs: Eliminates the requirement to provide educational or enrichment activities when providing snacks through NSLP or meals and snacks through the CACFP At-Risk Afterschool Meal Program.

- **Parents and Guardians to Pick Up Meals for Children:** State agencies are required to create a plan that ensures accountability and program integrity. The waiver applies to SBP, NSLP, SFSP, and CACFP.
- **Meal Pattern Flexibility in the Child Nutrition Programs:** Waives the requirements to serve meals that meet the meal pattern requirements. While the waiver is available to all states, program sponsors must submit requests to their State agency for approval that demonstrate disruptions to the availability of food products. The waiver applies to SBP, NSLP, SFSP, and CACFP.
- Monitoring Requirements for School Food Authorities (SFA) and State Agencies in the School Meals Programs: Waives for all SFA and State agencies the requirement that monitoring must be conducted on-site. SFAs and State agencies should continue monitoring activities remotely.
- Monitoring Requirements for Sponsoring Organizations and State Agencies in SFSP: Waives for all sponsors and State agencies the requirement that SFSP monitoring be conducted on-site. This includes new sponsor, annual, and pre-approval reviews. Sponsors and State agencies should continue monitoring activities remotely.
- Monitoring Requirements for Sponsors and State Agencies in CACFP: Reduces the number of site reviews CACFP sponsors must conduct from three to two; reduces the number of unannounced site reviews from three to one; waives the requirement that at least one site review must be conducted during meal service; and waives the requirement that no more than six months passes between site reviews. Waives the requirement for State agencies that CACFP monitoring be conducted on-site. Sponsors and State agencies should continue monitoring activities remotely.

These nationwide waivers offer important opportunities to ensure access to meals during this crisis, but additional nationwide waivers may be needed to ensure equal treatment for children across the nation and to reduce the administrative work that is required in order for State agencies to submit waivers and for USDA to approve waivers state by state. For example, most states have received an area eligibility waiver for the Summer Nutrition Programs, but there is variation within these waivers and low-income children in the other states do not have this access. If USDA has not issued a nationwide waiver to overcome a barrier to meal access that a State agency identifies, it can apply for a state waiver, and advocates, schools, program operators, and sponsors should encourage their State agencies to apply for waivers that are needed to support access to meals.

III. Best Practices to Serve Meals During School Closures

School districts and key community stakeholders, such as summer food and CACFP sponsors, food banks, meals on wheels, food pantries, and others experienced in implementing feeding programs or in organized meal delivery and distribution, should work together to develop a plan to ensure that children's nutritional needs are met during school closures. Effective programs should maintain safety and social distancing. Some best practices are included in the following list:

- Provide multiple meals at the same time to reduce the number of times a family has to pick up meals or that meals have to be delivered to children's homes. This can help some programs reduce their costs and better support social distancing. The State agency may approve a distribution approach that includes providing meals for multiple days, up to one week at a time. This option is now available for all programs: NSLP, SFSP, SSO, CACFP. <u>See question #15</u>.
- Allow parents or guardians to pick up meals without their children being present to limit the number of people at a site.
- Distribute and collect free and reduced-price meal applications at sites and/or share information about online applications.

- Offer meals during spring break, weekends, and holidays so there is no pause in access to meals for struggling families. <u>See question #22</u>.
- Deliver meals using school buses and their regular delivery routes so families can pick up meals at their regular bus stops. Make sure to clearly communicate with families well in advance the delivery times and procedures.
- Deliver meals directly to children's homes. School districts, SFSP sponsors, and CACFP operators can deliver meals directly to homes (mail, delivery service, or hand-delivered) with State agency approval. There is no additional federal funding for meal delivery beyond the federal per meal reimbursement. Schools, SFSP sponsors, and CACFP operators must first obtain written consent from households of eligible children (this can be through email or another electronic method) that they want to receive delivered meals. The student does not need to be present at the time of delivery. See <u>USDA's Q&A on SFSP/SSO meal delivery</u>, and <u>questions 9–13</u> in another USDA Q&A.
- Set up meal sites strategically throughout the community and offer as flexible hours as possible. Sites can include schools, parks, and bus stops, and can offer meals through "grab and go" and drive-thru models. This enables maximum access to food-insecure families while also improving social distancing.

Tips for "Grab and Go" Sites

- Carefully choose the distribution location, potentially outside. Avoid locations that are hard to find or require people to wait close together in enclosed spaces.
- Post clear signage, including where to park, where to pick up the meals, and any social distancing measures you want people to take.
- Set up the site to require as little personal interaction as possible, and maximize space between staff and recipients (should be at

least 6 feet apart), and reduce the number of items that multiple people will touch.

• Ask family groups in line to keep a 6-foot buffer from each other. Tape lines on the floor to show 6 feet of distance.

Tips for Drive-Thru Sites

- Choose the location of the pickup site to accommodate vehicles and ensure social distancing (bus drop-offs and car lanes can be a great option at school sites).
- Set up the site so families can take the meals without leaving their vehicles (drive-up tables, staff put meals in the backseat or trunk).
- Include clear signage to direct vehicles where to go and what to expect.

Spotlight on Model Programs

- **Kenowa Hills Public Schools (MI)** is delivering meals daily during the weekday on school bus routes to all children 18 and under, and to young adults with disabilities up to the age of 26. Any student or parent on behalf of their child can grab a meal at the bus stop.
- **Richmond County Public Schools (GA)** is continually evaluating and adjusting its program to meet the needs of families. In addition to having "grab and go" sites, the district has begun a yellow bus service to deliver meals to certain neighborhoods during a two-hour lunchtime window. Families can meet the bus at the end of their driveway. The school district allows parents to pick up the meal, even if the child is not present.
- Seattle Public Schools (WA), in addition to providing "grab and go" meals during the week at its 26 school sites, is also partnering

with area food bank volunteers to provide weekend food bags for students and their parents. All families in need can pick up weekend bags during the week at any of the school sites when they grab a meal.

- **Cincinnati Public Schools (OH)** has 24 "hubs" where the district provides two days of meals to families on Mondays and Wednesdays, and a breakfast and lunch on Fridays. It has called on school representatives, resource coordinators, and community groups to partner and set up tables stocked with additional supplies, such as hygiene kits, educational items, and additional food, to provide more support to families at its hubs. <u>Click here for the letter</u> the school district sent to the community, addressing volunteer requests and donations.
- Indy Parks and Recreation (IN) is serving a variety of meal options breakfast and lunch, lunch and snack, and just dinner across all of its family recreation centers in Indianapolis. In addition to city buildings, Indy Parks and Recreation is serving meals at apartment complexes. Sandwiches also are being provided to parents at meal pick-up.
- **The YMCA of Centre County (PA)** is providing meals and snacks at over 20 meal sites across the county, including Ys, schools, and fire stations. It is supplementing its SFSP program with donations from grocery stores, community members, farmers, universities, and restaurants, The Y also is partnering with local tow trucks to help transport meals.

For more examples of model programs, see <u>FRAC's Summary of School</u> <u>Districts and Program Providers' Efforts to Serve Meals During School</u> <u>Closings</u>.

Training and Safety Resources

- <u>Lunch Assist's Emergency Meal Service Toolkit and Template</u> <u>Resources for School Nutrition Professionals</u>
- <u>Institute of Child Nutrition's Resources to Prevent the Spread of the</u> <u>Coronavirus</u>
- <u>Austin ISD's COVID-19 Safety Plan</u>
- <u>Austin ISD's COVID-19 Curb Side Service Training Video</u>
- <u>Austin ISD's COVID-19 Bus Stop Service Training Video</u>

Communications

Streamline messaging to let families know about the availability of meals. Schools should clearly communicate information to families about where and when meals are available: when schools first close, and continue consistently throughout the entire school closure. Successful communication channels include the school's website, robocalls and robotexts, an email listserv that includes families, social media, public service announcements, and local media. If educators are connecting with students through virtual learning, ask them to share information about meals and sites during their sessions and in communications with students. Make your office number a "meal helpline" so that families can call and ask questions about ensuring their access to meals and avoid confusion. These methods also can be used for sharing information on additional resources (e.g., SNAP, P-EBT, community programs, learning resources) that can help struggling families during this time:

- FRAC's Map of COVID-19 State Websites and Meal Sites;
- Baltimore City's Free Meals Site; and
- Michigan Department of Education's Meal Map.

For more communications ideas, see <u>School Nutrition Association's</u> webinar on Tips for Effective Communication with Your Community <u>During COVID-19 School Closures</u>.

IV. P-EBT

The Families First Coronavirus Response Act created the P-EBT program, an important opportunity to provide nutritional resources to families who are losing access to free or reduced-price school meals due to school closures. P-EBT provides households an EBT card with the value of the free school breakfast and lunch reimbursement rates for the days that schools are closed. Schools must close for at least five consecutive days in order for families to receive a P-EBT card.

Eligible households include those whose children are certified to receive free or reduced-price school meals and children who attend schools that offer free school meals to all students through community eligibility or Provision 2.

For a state to provide P-EBT benefits to households, the state's SNAP and Child Nutrition Agency must submit a joint plan to USDA that describes how they will operate P-EBT. The Act gives USDA the authority to allow state child nutrition agencies and school nutrition departments to release information to SNAP administrators in order to implement P-EBT.

Urge your State agencies to create a comprehensive plan to implement P-EBT. See <u>Pandemic EBT: A Critical Opportunity for States</u> for more information.

Additional Resources

- <u>USDA Q&A #3: Child Nutrition Program Meal Service during Novel</u> <u>Coronavirus Outbreaks</u>
- <u>USDA Q&A: Child Nutrition Program Meal Service during COVID-19</u> <u>Outbreaks</u>
- <u>USDA Q&A: COVID-19 SFSP and SSO Meal Delivery Using Existing</u> <u>Authority</u>
- USDA-FNS Response to COVID-19 webpage
- <u>USDA's Meals 4 Kids Map</u> to locate sites serving meals nationwide.