



COVID-19 Considerations for Reopening Schools

July 27, 2020

Food Service Operations – Waivers for USDA School Meal Programs

The Kentucky Department of Education released “[COVID-19 Considerations for Reopening Schools: Food Service Operations for USDA School Meal Programs](#)” on June 22, 2020. That guidance was focused on developing a food service plan inside school buildings and developing ancillary plans in the event the U.S. Department of Agriculture (USDA) extended waivers to allow feeding enrolled students who are participating in virtual learning.

On June 25, 2020, the USDA released nationwide waivers for the upcoming 2020-2021 school year. This additional guidance is being distributed to assist with planning to provide meals to enrolled eligible students who are participating in USDA school meal programs and may be learning virtually for all or a portion of the upcoming school year due to the COVID-19 pandemic.

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Meal Service Nationwide Waivers

The USDA issued nationwide waivers of program requirements in response to COVID-19 for school year 2020-2021. These waivers provide flexibility to select regulatory program requirements of the National School Lunch (NSLP) and School Breakfast (SBP) programs which



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will enable schools to provide meals to enrolled students receiving virtual instruction due to COVID-19 on non-traditional instruction days (NTI).

Non-Congregate Feeding Waiver

The [Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs - Extension #2](#) waives the requirements stated in the National School Lunch Act for NSLP and SBP meals to be served in a congregate setting and consumed by the participants on site. This waiver allows for schools to serve meals to their enrolled students who are receiving virtual instruction due to COVID-19 on NTI days.

Meal Times Waiver

The [Nationwide Waiver to Allow Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program - Extension #2](#) waives the regulatory requirements for the breakfast and lunch meal service times outlined in [7 CFR 210](#) and [7 CFR 220](#). This waiver allows for breakfast and lunch to be served outside of the stated time period requirements, enabling schools to provide multiple meals at a time to enrolled students who are receiving virtual instruction due to COVID-19 on NTI days.

- Schools are required to notify the Kentucky Division of School and Community Nutrition of their desire to implement the above waivers.
- Use [this Google doc](#) to apply for the waivers.

Program Integrity Requirements

The waivers provide schools with the flexibility to serve meals to their enrolled students outside of the traditional school setting. The waivers do not allow schools to serve those meals through community feeding program models as was allowed at the beginning of the pandemic in the spring of 2020. Unless specifically addressed in guidance, the program requirements of the National School Lunch and Breakfast programs apply to the meals served to enrolled students receiving virtual instruction due to COVID-19 on NTI days.

- All enrolled students receiving virtual instruction due to COVID-19 on NTI days must be provided the same access to school meals.
 - Regardless of the eligibility status of the student, schools operating under the waivers must provide access to the school meal program for all enrolled students receiving virtual instruction due to COVID-19 on NTI days.
 - For example, it would not be acceptable to only provide meals to free status students in order to avoid having to receive payments for meals from reduced-price and paid students.
 - Enrolled students cannot be required to receive meals. The prohibition of requiring students to take meals in the NSLP and SBP under normal program operations also applies to meals provided to enrolled students receiving virtual instruction due to COVID-19 on NTI days.

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- School Food Authorities (SFAs) will need to implement a system in which all enrolled students will have access to meals regardless of their eligibility status.
 - Processes for the payment of meals for reduced-price and paid status students will need to be implemented and communicated to households.
 - SFAs will need to develop processes to communicate to households.
- Maximum number of meals per child that may be served:
 - 2 meals – 1 breakfast and 1 lunch per NTI day for each enrolled child – may be provided.
 - Multiple meals for multiple NTI days may be provided at one time.
 - Reimbursable meals with all required components must be provided.
 - Schools may provide a unitized breakfast and a unitized lunch for each child.
 - Meals are considered unitized when meal components are provided and packaged in amounts for a single meal. For example, a unitized “grab-n - go” bagged breakfast for K-6 may include: 8 fluid ounces (1 cup) milk, 1-ounce equivalent cereal, 1-ounce equivalent cheese stick and 1 cup fruit.
 - Schools may provide bulk food items when providing meals for multiple children and/or multiple days.
 - Bulk food packages contain an amount of food that is more than what is required at a single meal under the NSLP or SBP meal pattern. A bulk food item may provide food to be eaten at more than one meal or for more than one child. For example, a quart of milk provides four 1-cup servings.
 - Bulk meals provided to households should include information describing how the bulk food items contribute to the planned menu for each child, each day, and instructions for portioning food items at mealtimes. For example, the instructions provided would communicate that the quart of milk has been provided in order to serve 8 fluid ounces (1 cup) of milk with each meal for each child.
 - Meal Counting and Claiming Requirements
 - Traditional schools claim the meals served to their enrolled students according to the individual eligibility status of the student receiving the meals.
 - Community Eligibility Provision schools claim the meals served to their enrolled students by applying their approved claiming percentages for the total number of meals served for each type of meal service.
 - Meals are counted for claiming at the time they are distributed and are recorded in the school’s records as “served” for the day or days in which the meals were provided.



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- For example, AAA School sends 2 days of breakfast and lunch meals home with Ann B. (example student) on Sept. 15 for consumption on NTI days scheduled on the 16th and 17th. AAA School would record in their meal count records that Ann B. received 1 breakfast meal and 1 lunch meal on the 16th and 1 breakfast meal and 1 lunch meal on the 17th at the time she is provided the meals on the 15th.
 - Districts utilizing central locations for meal distribution in which meals are distributed to students from multiple schools must have a system in place to count the meals served to the individual students at their enrolled school.
- Menu and Production Record Requirements
 - Menus must be planned for the appropriate age/grade group served.
 - Program operators must continue to provide reasonable modifications to program meals to accommodate children with disabilities.
 - Production records must be maintained with all required production record documentation.
 - When multiple days of meals are provided at the same time, the production and menu records for the length of time provided must show all meals for the days provided, amounts provided and meal component crediting information.
 - Production records must indicate the total number of meals produced and served.
 - Program operators must keep menu documentation such as labels, recipes, and manufacturer specifications in accordance with program regulations.

Meal Service Models

There are multiple meal service models that schools can operate when using both the non-congregate and meal service time waivers.

Meal Pick-Up Services

Meals are picked up at the school and taken home by a parent/guardian (waiver approval required when children are not present) or provided directly to the student.

- Schools must have a method to count meals by individual student, collect payments when applicable and include internal control processes that would prevent duplicate meals being provided.
- Schools should use meal distribution strategies that maintain social distancing and avoid the formation of groups or tight lines. Best practices include a “drive-through” style meal pick-up or staggered pick-up times.



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- Food safety and sanitation standard operating procedures (SOPs) for cleaning and sanitizing surfaces, handwashing, employee health, etc., should be followed by all staff distributing meals.
- Parents or guardians and students should be reminded not to come to meal distribution sites if they are sick.

Parent or Guardian Pick-Up Waiver

The [Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children - Extension #2](#) waives the meal-counting requirement that meals must be served directly to an eligible child as part of a point-of-service meal count for students who are receiving virtual instruction due to COVID-19 on NTI days. This waiver allows schools to count meals for reimbursement when they are picked up by a parent or guardian of an enrolled student regardless of whether the student is present.

- Schools are required to request approval for use of this waiver. SCN will review and approve procedures to ensure compliance.
- Schools must:
 - Provide a description of how it will be ensured that meals are provided to an enrolled student’s parent or guardian picking up the meal.
 - Provide a description of the meal-counting process used to ensure that duplicated meals are not provided.
- Access to the waiver request form can be found [here](#).

| Guiding Questions for Meal Pick-Up Services |
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| How will parents or guardians identify themselves and their association with an enrolled student? |
| How will the school communicate to households the process for identification at the time of pick up? |
| How will students, parents or guardians communicate to the school food service department that they wish to participate in program meal service? |
| Will multiple meals be provided? Will meals be unitized or bulk food provided? |

Sending Meals Home with Students

Schools provide meals to students during an in-person instruction day to take home for consumption the following day or days during NTI.

- Schools must have a method to count meals by individual student, collect payments when applicable and include internal control processes that would prevent duplicate meals being provided.
- Program operators must take food safety into consideration when planning menus that would be transported home by students.



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| Guiding Questions for Sending Home Meals with Students |
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| How will students, parents or guardians communicate to the school food service department that they wish to participate in program meal service? |
| How will meals be distributed to students to take home, keeping in mind food safety considerations when necessary? |
| Will multiple meals be provided? Will meals be unitized or bulk food provided? |
| How will meal counts be taken that ensure each student's meal is recorded to ensure that duplicate meals are not distributed? |

Meal Delivery Services

Schools use their school buses on their normal bus routes to deliver meals and serve at bus stops or delivered directly to households.

- Delivering meals directly to households require schools to obtain written permission from the household prior to delivering meals.
- Processes to count the meals served to individual students must be implemented and marked when the meals are provided.

| Guiding Questions for Meal Delivery Services |
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| How will students, parents or guardians communicate to the school food service department that they wish to participate in program meal service? |
| How will meal counts be taken that ensure each student's meal is recorded to ensure that duplicate meals are not distributed? |
| How will meals be distributed, keeping in mind food safety considerations when necessary? |
| Will meals be delivered to a common bus stop location or will meals be taken to individual households (requires parent permission)? |

Additional Waivers

Waivers unrelated to the service and timing of meals have been issued to provide further program flexibility for schools.

Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools

The [Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in the National School Lunch program for School Year 2020-2021](#) waives the requirement for schools to utilize offer versus serve in the service of meals to students in the 9-12 age/grade group. This waiver allows schools to unitize meals that are served to high school-age students.

- Schools are required to notify the Kentucky Division of School and Community Nutrition of their desire to implement this waiver.



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- Access to the waiver request form can be found [here](#).

Meal Pattern Flexibility Waiver

The [Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs - Extension #4](#) allows state agencies to approve schools to serve meals that do not meet meal pattern requirements due to COVID-19.

- Schools are required to notify the Kentucky Division of School and Community Nutrition of their desire to implement this waiver.
- Schools can complete an online waiver request in order to be approved to utilize this nationwide waiver. Schools will be required to provide rationale for the request. The Division of School and Community Nutrition will review and approve to ensure compliance.
 - Schools will describe details for the meal pattern component they are requesting to be waived.
- The [Non-Congregate Feeding, Meal Service Time Flexibility, & OVS Flexibility for Senior High Schools waiver](#) is available online.

Additional Resources

The following additional resources are available for program operators:

- School Nutrition Association – [Member Resources: Coronavirus Disease](#)
- School Nutrition Association – [“COVID-19 Thought Starters on Reopening Schools for SY 2020-21”](#)
- Institute of Child Nutrition – [Food Safety Resources](#)

(COMMS: tm_jg)