

Policy Guidance for School Food Authorities (SFAs) to Serve Meals in the 2020-21 School Year: Coronavirus (COVID-19) Recovery Period

(Updated Feb. 16, 2021)

The Office of the State Superintendent of Education (OSSE) issues this guidance to school food authorities (SFAs) in the District of Columbia to ensure students have continued access to meals throughout the 2020-21 school year. The following guidance should be used as an operational resource for serving meals upon the reopening of schools in the 2020-21 school year. It should be used in conjunction with OSSE's Healthy and Safety Guidance for Schools: COVID-19 Recovery Period and Frequently Asked Questions to ensure meals are provided in the safest way possible. Changes to this guidance since the last version are highlighted in yellow.

For more information on the District of Columbia Government's response to coronavirus (COVID-19), please visit <u>coronavirus.dc.gov</u>. The Center for Disease Control's most recent, supplemental guidance for schools can be accessed here.

Applicable Meal Programs: School Breakfast Program (SBP), National School Lunch Program (NSLP), Afterschool Snack Program (ASSP), Fresh Fruit and Vegetable Program (FFVP), Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP), Seamless Summer Option (SSO)

Effective Date: July 1, 2020 - June 30, 2021. Please note that not all information included in this guidance extends through June 30, 2021. When an earlier date applies, it is stated.

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Reimbursable Meal Programs

OSSE urges every SFA to explore all options for serving meals on school operating days and nonoperating days, and to customize meal operations to provide continuous access to meals for students.

SFAs may operate the SBP, NSLP, SSO and/or the SFSP through June 30, 2021. SFAs may also operate the ASSP and/or the at-risk afterschool component of CACFP concurrently with any of the previously mentioned programs. SFAs may operate SFSP or SSO at some schools, and SBP and NSLP at others as long as they effectively manage each program. Meals <u>must</u> follow the applicable meal pattern (unless a waiver has been approved, additional details below) and <u>must</u> be served and claimed at the appropriate student eligibility status including free, reduced, or paid, or Community Eligibility Provision (CEP) status, when applicable. Table 1 identifies when child nutrition program can be utilized to serve reimbursable meals.

Table 1. Reimbursable Meal Programs and Meals Served by Times of Operation

Times of Operation	Reimbursable Meal Programs	Meals that can be Served
Operational School Days	School Breakfast Program (SBP)	Breakfast
Includes in-person and	National School Lunch Program (NSLP)	Lunch
distance learning	Afterschool Snack Program (ASSP) Afterschool, provided there is an activity offered	Snack

	At-Risk Child and Adult Care Food Program (CACFP) Afterschool, provided there is an activity offered Summer Food Service Program (SFSP) Allowable through June 30, 2021 Seamless Summer Option (SSO) Allowable through June 30, 2021	One meal (breakfast, lunch, or supper) and one snack (AM or PM) • Up to two meals each day • Meals may be any combination of breakfast, lunch, AM or PM snack, or supper, EXCEPT for lunch and supper
Non-Operational School Days Professional development days Breaks during the school year Weekends	At-Risk Child and Adult Care Food Program (CACFP) Activities must be offered	One meal (breakfast, lunch, or supper) and one snack (AM or PM)
 May – September for traditional school calendars Non-Operating days including weekends 		
 Unanticipated School Closures Resulting from emergencies (e.g., hurricane; note: distance learning due to COVID-19 is NOT an eligible emergency after June 30, 2020) October – April 	Summer Food Service Program (SFSP) Seamless Summer Option (SSO)	 Up to two meals each day Meals may be any combination of breakfast, lunch, AM or PM snack, or supper, EXCEPT for lunch and
Student Vacations for Year-Round Schools ONLY • SFSP: 15 days or more • SSO: 10 days or more		supper
*See Non-Operational School Days and Summer above for meal options during student vacations for traditional school year programs		

Site Types

Within the SFSP and SSO, SFAs have the option to operate different site types. An SFA may choose the site type based on the mode of instructional delivery (such as in-person, distance learning, or hybrid); the health, safety, and space constraints at sites; other feeding options available to children who are not enrolled in school; and resources and capabilities. Each allowable site type is described below. Site types must be applied for within each program application and approved by OSSE.

Traditionally, the SFSP and SSO site types below require sites to be determined as area eligible, meaning that they serve a population in which at least 50 percent of students qualify for free and reduced-price

meals. Meals served at these sites are reimbursed for at the free rates. In DC, all but 14 DCPS sites are area eligible. In the 2020-21 school year, the area eligibility requirement can be waived upon request. To request a waiver to the area eligibility requirement, reach out to your program specialist.

- Open: Meals <u>must</u> be available to any child in the community under age 18.
- **Open Restricted:** An open site may be classified as restricted if an SFA chooses to restrict or limit the site's attendance for reasons of security, safety, or control.
- Closed Enrolled: SFAs operating SFSP or SSO during the regular school year during COVID-19 may operate closed enrolled sites that limit participation to only students enrolled at the school site. SFAs must provide an explanation of why they want to operate a closed enrolled site.
- Mobile: A mobile feeding site operates like an open feeding site. Each stop on the mobile
 feeding route is considered its own site and must complete a site-level application within the
 SFAs programmatic application.
- Camps: Sites offer regularly scheduled food service along with organized activities for enrolled campers. Camp sites must collect and maintain individual income applications. Meals served at these sites are reimbursed at the free rates only for meals served to students eligible for free or reduced-price meals. Camps may serve up to three meals per day to each enrolled child through any of the following combinations.
 - Breakfast, lunch, and supper;
 - Two full meals and one snack;
 - Two snacks and one full meal.

Waivers and Flexibilities

USDA has issued waivers and provided flexibilities to support access to nutritious meals while minimizing potential exposure to COVID-19. A full list of USDA memos can be found here. Table 2 below provides an overview of waivers applicable to serving meals in the 2020-21 school year and is followed by additional detailed guidance.

Table 2. USDA Meal Waivers Applicable to the 2020-21 School Year

Waiver	Regulation	What is Waived	Programs	Expiration Date
Non-congregate Feeding – SBP, NSLP, CACFP Non-congregate Feeding – SFSP/SSO	participants consume meals on-site in the	Allows for consumption of meals off-site and outside of group settings. Further, this allows for serving models like grab-n-go, curbside pickup, mobile/bus routes, and home delivery. Allows for after-school enrichment activities to be conducted virtually or in other non-congregate ways.	SBP NSLP ASSP CACFP SFSP SSO	June 30, 2021
Meal Service Times – SBP, NSLP, CACFP Meal Service Times – SFSP, SSO	Requires meals be	Provides flexibility for serving times. Allows for serving multiple meals at one time including multiple days' worth of meals. The combination of the non-congregate feeding waiver and the meal service time waiver allows for bulk items to be served. SFAs must still establish meal service or delivery times.	SBP NSLP ASSP CACFP SFSP SSO	June 30, 2021

Parent/ Guardian Meal Pick-up — SBP, NSLP CACFP Parent/ Guardian Meal Pick-up - SFSP/ SSO	Require that meals must be served to eligible children.	Allows for distributing meals to adults without a child present. SFAs must ensure integrity and have a system to verify that adults have eligible children.	SBP NSLP ASSP CACFP FFVP SFSP SSO	June 30, 2021
Meal Pattern Flexibility — SBP, NSLP, CACFP Meal Pattern Flexibility — SFSP/SSO	Require that meals follow a prescribed meal pattern.	With OSSE approval, allows SFAs to claim for reimbursement even if a meal does not meet all meal pattern requirements or include all meal components. Waivers granted on a caseby-case basis.	SBP NSLP ASSP CACFP SFSP SSO	June 30, 2021
Offer Versus Serve (OVS) Flexibility for Senior High Schools	Require that offer versus serve be implemented in all high schools.	Eliminates the requirement for high schools to implement OVS. This is intended to make it easier for schools to serve pre-plated meals in the classroom if needed or to offer multi-day meal kits to students engaged in distance learning.	NSLP	June 30, 2021
School Meals Programs Onsite Monitoring Requirements	Requires SFAs with more than one school to conduct on-site lunch reviews and on- site breakfast reviews annually by Feb. 1.	The onsite monitoring requirements have been waived. SFAs should, but are not required to, continue monitoring program activities off-site, through desk audits, to the maximum extent possible.	SBP NSLP	June 30, 2021
FFVP Alternate Site	Requires FFVP to be served at approved elementary school sites.	Allows for FFVP to be distributed at an approved alternate site if the elementary school site is not open for meal service.	FFVP	June 30, 2021

Waiver and Flexibility Guidance

The following sections provide additional detail about meal service under these waivers and flexibilities.

Electing the Use of Waivers

SFAs <u>must</u> elect the use of each waiver they want to utilize and receive approval from OSSE prior to implementation. The waiver request form for the SBP, NSLP, ASSP, FFVP, CACFP, and SSO can be found <u>here</u>. Instructions for completing and submitting the waiver request form are included within the form. SFAs that have submitted waivers for the SBP, NSLP, and ASSP and want to apply those waivers to the SSO do not need to reapply.

SFAs <u>must</u> elect the use of each SFSP waiver they want to utilize and receive approval from OSSE prior to implementation. The SFSP waiver request form can be found here at SFSP Waiver Registration. Contact SFSP Coordinator Shaneka King at <u>Shaneka.King1@dc.gov</u> with questions regarding the SFSP waivers.

Meal Service

On-Site

To the extent feasible, schools should allow students to eat outdoors or in their classrooms, while maintaining social distance (at least 6 feet apart) to the maximum extent feasible, rather than mixing in the cafeteria. If not possible, then stagger trips to the cafeteria by class and/or divide outdoor eating area by class, cleaning and sanitizing between groups. If students are picking up meals from the cafeteria to bring outdoors or to their classroom, also stagger trips to the cafeteria by class. Utilize these breakfast in the classroom and grab and go to the classroom resources to plan for operationalizing meals in the classroom.

On-Site and Distance Learning

OSSE strongly encourages meals be offered in non-congregate settings. Non-congregate means that meals may be taken away from the site and consumed elsewhere, allowing for social distancing; often referred to as "grab and go." Schools may choose to elect the non-congregate waiver for each meal type, or for all meals. When electing the non-congregate waiver, schools <u>must</u> offer the same meals to every enrolled student whether they attend through distance learning or in-person. For example, if the non-congregate waiver is elected for both breakfast and lunch, and those meals are available to students attending school in person, breakfast and lunch <u>must</u> be available to students in distance learning. Menus for each may vary.

Meal Service Times

SFAs can establish meal times and service lengths that best support access to nutritious meals while minimizing potential exposure to COVID-19. Meals can be served outside of required breakfast, lunch, snack, and supper serving times. OSSE encourages SFAs to serve multiple meals (and multiple days' worth of meals) at once to students who are not on-site daily, to make the pick-up and potential conflict with remote instructional time less onerous.

Afterschool NSLP Snack & CACFP Supper Program Activities

To be eligible to serve the afterschool snack or supper program, the after-school care program <u>must</u> provide children with regularly scheduled educational or enrichment activities in a supervised environment. SFAs that elect to use the non-congregate and parent pick-up waivers may conduct education or enrichment activities virtually, or in other non-congregate ways. The after-school care program <u>must</u> offer education or enrichment activities, but children are not required to participate in or complete the activity in order to receive an afterschool snack.

Program operators may consider offering online homework assistance, activity packets, electronic games and books, or other e-learning activities for children to partake in at home. For example, Team Nutrition offers a variety of online games, books, and nutrition education activities for children.

Multiple Days' Worth of Meals

Utilizing a combination of SBP, NSLP and CACFP, or through operation of the SFSP or SSO, SFAs may provide up to seven days' worth of meals at one time. Examples of how meals can be provided to students with schedules that are a combination of in-person and distance learning, or all distance learning are provided in Table 3.

SFAs operating a five-day school week may provide up to five days' worth of reimbursable SBP and NSLP meals at a time. SFAs also participating in the CACFP and offering activities on the weekend may provide up to seven days' worth of meals at a time. There are many other combinations of in-person and distance learning schedules that students could use, and meal distribution plans should be customized to meet students' needs. When determining a meal distribution plan, SFAs should take into consideration the ability of students and families to travel for meal distribution and their ability to carry meals home.

Table 3. Examples of Serving and Distributing Meals by Schedule

Example Schedule	Meals Served	Distribution Method
Any combination of in-person, hybrid, or distance learning schedules. For example: Student is distance learning 5 days a week; OR Student is on-site 2 days a week, and distance learning 3 days a week	Operational & Non-Operational Days/Weekends 7 Breakfast (SFSP or SSO)* 7 Lunch (SFSP or SSO)* *Allowable through June 30, 2021	Monday: Student or parent/guardian picks up 3 days' worth of meals (6 meals in total) Thursday: Student or parent/guardian picks up 4 days' worth of meals (8 meals in total)
Student is on-site Monday & Tuesday Student is distance learning Wednesday – Friday Activities are offered after school, and Saturday – Sunday (can be offered in a virtual or noncongregate setting) (A similar meal distribution could be implemented for students distance learning Monday – Wednesday and onsite Thursday and Friday.)	Operational & Non-Operational Days/Weekends 7 Breakfast (SFSP or SSO)* 7 Lunch (SFSP or SSO)* 7 Supper (CACFP) *Allowable through June 30, 2021	 Monday: Breakfast and lunch served in the classroom Supper served grab-and-go to take home Tuesday: Breakfast and lunch served in the classroom Supper served grab-and-go to take home Student or parent/guardian picks up 5 days' worth of meals for remaining days (15 meals in total)
 Student is distance learning 5 days a week Activities are offered after school (can be offered in a virtual or non- congregate setting) 	Operational Days	Monday: • Student or parent/guardian picks up 3 days' worth of meals (9 meals in total) Thursday: • Student or parent/guardian picks up 2 days' worth of meals (6 meals in total)

Food safety (see below) is of utmost importance. When distributing more than one day's worth of meals at a time, SFAs should use the Centers for Disease Control and Prevention guidance for storing leftovers when planning their menu. SFAs <u>must</u> provide information on how long each menu item can remain in

the refrigerator and continue to be safe for consumption. SFAs should provide students with the menu for the week and guidance on cold food handling, and holding and reheating, to ensure all students are following proper food safety procedures. Menus should ensure that the food will last until the day planned for consumption, or be replaced with a shelf-stable-item. Meals that are not consumed before the last day they can safely be eaten should be discarded.

Bulk Items

When providing multiple meals at one time, SFAs may provide bulk items so long as individual meals are easily identifiable as a reimbursable meal. All or some items may be provided in bulk.

When implementing such a delivery mechanism, program operators must:

- include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- ensure that food items are clearly identifiable as making up reimbursable meals; and
- provide menus with directions indicating which items are to be used for each meal and the portion sizes.

When implementing such a delivery mechanism, program operators **should** consider the following:

- whether households have access to needed appliances (e.g., refrigerator, stove, microwave)
 when providing food that requires refrigeration or further preparation, such as reheating; and
- only minimal preparation is required (e.g., recipes that do not require chopping, mixing, baking).

Parent/Guardian Pick-up

Meals may be distributed to a parent or guardian to take home to their children without the children being present if certain processes are followed. SFAs <u>must</u> have a plan in place to ensure accurate accountability and verify that adults have eligible children. Plans <u>must</u> include a process to ensure that meals are distributed only to parents or guardians of eligible children and <u>must</u> ensure that duplicate meals are not distributed. When approved by a student, parent, or guardian, a proxy may pick up meals. SFAs should have a plan in place to ensure proxies are approved by a student, parent, or guardian of an eligible student.

Home Delivery

If the SFA determines there is a need and it is logistically feasible to deliver meals directly to homes, it may do so with OSSE approval. SFAs <u>must</u> first obtain written consent from households of eligible children (consent can be obtained through email or other electronic means) that the household wants to receive delivered meals. SFAs should confirm the household's current contact information and the number of eligible children in the household to ensure the correct number of meals are delivered to the correct location.

SFAs <u>must</u> protect the confidentiality of students and their households throughout this process. The National School Lunch Act (NSLA) and the Family Educational Rights and Privacy Act (FERPA) do not authorize the release of household contact information for children without first obtaining the written consent of the child's parent or guardian. The SFA <u>must</u> be the entity that makes the first contact about meal delivery with the households of eligible children and must notify the household if contact information will be shared with an external organization, for example, a local nonprofit that will provide

meal delivery. Once the SFA receives written consent from the parent or guardian to release contact information, the SFA may share the information with other organizations involved with meal delivery. The written consent must: (1) specify the records that may be disclosed; (2) state the purpose of the disclosure; and (3) identify the party or class of parties to whom the disclosure may be made.

If the SFA is using a private vendor, they <u>must</u> have a memorandum of understanding (MOU) with the vendor concerning the confidentiality requirements under the regulations implementing the NSLA. The MOU should include information such as what will be disclosed, how the information will be used, how the information will be protected from unauthorized uses and disclosures, and penalties for unauthorized disclosure. The SFA <u>must</u> ensure data are handled appropriately at all times and by all organizations involved with meal delivery to safeguard household confidentiality.

Meal Pattern

OSSE strongly encourages SFAs to maintain and meet the nutrition standards for each program to the greatest extent possible.

As a result of an April 13, 2020 court decision, school meal patterns <u>must</u> return to the requirements of the 2012 final rule, Nutrition Standards in the National School Lunch and School Breakfast Programs. Federally, changes to whole grains, milk, and sodium levels are impacted. The <u>DC Healthy Schools Act nutrition standards</u> already include the standards for whole grains and milk, so SFAs in DC should only be impacted by the requirement to meet <u>sodium target 2 weekly sodium levels</u>. Previously, SFAs only had to meet sodium level 1 weekly sodium levels. If an SFA cannot meet the sodium target 2 weekly sodium levels, send <u>this notification</u> to your program specialist, who will update the waiver request form on your behalf, and a waiver will be approved for the 2020-21 school year. SFAs must plan to meet sodium target 2 weekly sodium levels in the 2021-22 school year.

Additionally, if there are targeted and justified plans to support access to nutritious meals while minimizing potential exposure to COVID-19, OSSE may approve a request to waive the requirement that meals meet meal pattern requirements. Waiver requests should be specific to each meal component and will be approved on a case-by-case basis. Meal pattern waivers may be approved for the duration of an SFAs educational plan. SFAs should revise their meal pattern waiver if and when their educational plans change. Examples of approved meal pattern waivers are included below:

- **NSLP vegetable subgroups:** When shelf-stable only meals are being provided, the dark green vegetable subgroup may be waived as shelf-stable items in this subgroup may require more extensive preparation and cooking than students and households are able to provide.
- **Milk:** When shelf-stable only meals are being provided and shelf-stable milk is inaccessible, the milk component may be waived.
- **NSLP age/grade group requirements:** SFAs are encouraged to use the overlap between the requirements in the different age/grade groups to offer a single menu to multiple grade groups without the use of a meal pattern waiver. If an SFA requests to serve the same lunch meal to pre-K-12, OSSE recommends the following options:
 - Grade 9-12 meal pattern be followed with accommodations made for meals served to preschool students, accounting for choking hazards.
 - Grades K-5 or 6-8 meal pattern be followed, with the addition of a half cup of fruit or vegetable offered to students in grades 9-12. Accommodations made for meals served to preschool students, accounting for choking hazards.

OSSE may now waive the requirement that two or more varieties of milk are offered in the SBP and NSLP, in addition to the existing option to waive this requirement in the SSO.

Program operators are not relieved of their obligation to provide meal modifications for participants with disabilities and must adhere to all special dietary needs that have been submitted by a state-recognized medical authority. Recognized medical authorities are physicians, physician assistants, nurse practitioners, or other professionals specified by the state agency. Program operators should consider how individuals who require meal modifications will be identified and served.

Detailed information on shelf-stable foods, those that can be stored at room temperature for an extended period of time, can be found here. Shelf-stable milk may be used as needed. Other shelf-stable items include, but are not limited to, applesauce, sun butter, crackers, granola, dried meats and fruits, and juice. More information for crediting shelf-stable meat, poultry and seafood products can be found here.

Pre-K Meal Pattern

As a reminder, pre-kindergarten students must be served the pre-K meal pattern unless they are comingled with older students during meal service.

Water

Schools are generally required to make potable water available to students where meals are served during the meal service. Schools <u>must</u> ensure adherence to <u>OSSE's health and safety guidance</u> surrounding the use of water fountains and bottled water. During the 2020-21 school year, the following applies:

- When meals are served in the **cafeteria**, potable water <u>must</u> be made available during the meal service.
- When **breakfast** is **served** in **the classroom**, schools are encouraged, but not required to make potable water available during meal service.
- When lunch is served in the classroom, schools <u>must</u> make potable water available during meal service.
- Schools are not required to make potable water available during meal service when meals will be consumed outside of the school, including in grab and go and home delivery models.

Food Service Management Company (FSMC) 21-Day Menus

For new contracts entered into in the 2020-21 school year, SFAs and FSMCs must follow the 21-day cycle menu for the first 21 operational days of the school year submitted as part of the Request for Proposal (RPF). If SFAs and their FSMCs require changes to the menu to meet modified school meal service methods due to safety concerns, SFAs <u>must</u> review and approve all menu changes, notify OSSE regarding planned modifications, and submit changes to OSSE for review and approval prior to implementation. If necessary, SFAs may also request a meal pattern waiver.

Fresh Fruit and Vegetable Program (FFVP)

SFAs currently participating in FFVP may operate FFVP beginning with the first instructional day of the 2020-21 school year and serve both students in the school building and those distance learning. SFAs operating FFVP may:

- Serve to students in a non-congregate setting (including home delivery).
- Serve FFVP at a time the operators deem appropriate, including outside of a regular school day.
- Provide FFVP alongside other child nutrition program meals (for example SFSP, SSO, or NSLP).
- Provide multiple days' worth of FFVP foods at one time when the school is providing multiple
 days' worth of meals at a time. The FFVP serving for a week must reflect what would be served
 to a student during the school week.
- Provide FFVP to any child attending an elementary school that is operating an open meal site.
- Provide FFVP to all children in the household regardless of age when provided via home delivery along with SFSP/SSO meals.
- Donate fresh produce if it cannot be used and would need to otherwise be disposed.

Waivers are not necessary to utilize these flexibilities and can begin immediately.

In addition to the flexibilities above, DC has been approved for two FFVP specific waivers, detailed below. Both statewide waivers are in effect through June 30, 2021. Upon waiver approval, SFAs may:

- 1. Allow FFVP foods to be picked up by a parent or guardian without a student being present; and
- 2. Allow FFVP foods to be served at alternate non-elementary school sites if the elementary school building is closed or alternate instructional models are being provided.

Schools may request reallocation of unobligated, unexpended FFVP funds from elementary schools to other participating FFVP schools (or those participating via the second waiver above). For example, elementary schools A, B, and C participate in FFVP. Schools B and C suspend their foodservice due to the public health emergency. School A can request a reallocation of unobligated FFVP funds from school B and C to school A. School A will now offer FFVP to students from schools A, B, and C.

To request use of these waivers or a reallocation of funds for FFVP, email Kimberly Thompson.

While elementary schools operating FFVP are encouraged to provide a nutrition education lesson with the FFVP service, OSSE recognizes that a nutrition education lesson may not be possible during this public health emergency or recovery period. Therefore, providing nutrition education lessons with the FFVP is encouraged, but not required. A variety of free nutrition education materials are available online. OSSE recommends the following:

- USDA Food Fact Cards
- USDA Fruit & Vegetables Galore: Helping Kids Eat More
- USDA Nutrition Education Materials

Local partners, such as community-based organizations, health departments, and the USDA Extension Service, are also good sources for nutrition education and promotional materials that may be used in the program.

Food Handler Requirements

SFAs serving meals from their school must have a certified food protection manager on site with a district-issued food protection manager identification (ID) card. SFAs operating home delivery do not need a food protection manager present during the delivery.

Counting and Claiming

The following section provides additional detail about taking proper accountability and claiming reimbursable meals. Reference OSSE's <u>Accountability and Collection Procedures</u> for details on proper point of service (POS). Meals are reimbursable at the federal and local reimbursement rates. While meals may be provided using the waivers and flexibilities described, there are no additional funds provided for utilizing the waivers.

SFSP and SSO

Program staff may simply keep a count of all meals served to track and claim meals by type. Program staff may focus on quickly providing meals at meal sites instead of spending time confirming individual student enrollment and eligibility status. Meals may be recorded using a <u>daily meal count form</u>. If multiple days' worth of meals are distributed, meals should be accounted for on the day they intend to be consumed. Meals cannot be claimed for reimbursement on a day prior to the distribution of the meal.

If an SFA planned to serve meals through the SBP and/or NSLP at the start of the school year, they may claim those meals under SFSP or SSO instead (provided their application is updated and approved). These meals can be reimbursed at the free SFSP or SSO rates. However, any student who paid for their meals must receive a refund for their meal payments.

School Meal Programs (SBP, NSLP, ASSP)

Since meal service through the SFSP and SSO are now allowable through June 2021, very few SFAs will be operating these traditional school meal programs. The guidance below still applies for those operating the programs, but OSSE encourages SFAs to reach out to their program specialist to determine if switching to SFSP or SSO operations may be more advantageous.

Accountability processes for providing meals to students attending non-provision schools <u>must</u> include a system to record the number of free, reduced-price, and paid meals served. This is often recorded using student personal identification numbers (PIN) numbers or student rosters.

Accountability processes for providing meals to students attending schools participating in the Community Eligibility Provision (CEP) may include tallying the total number of reimbursable meals served, without accounting for student eligibility. Meals are then multiplied by a CEP eligibility rate when claiming for reimbursement. Meals served at CEP schools are often recorded using a <u>daily meal count form</u>.

When serving meals in a non-congregate setting to students engaged in distance learning, including the use of parent-pickup, OSSE encourages SFAs to consider the following distribution methods. Implementing any or a combination of these distribution methods will reduce the distance students and families need to travel to receive meals, increase access to meals, and possibly reduce the number of

school's families must visit to receive meals for multiple children. Each distribution method, along with considerations for each, is described in further detail below.

Table 4. School Meal Programs Distribution Methods

Distribution Method	Recommended For		
Allowing students to pick up meals at ANY site within the SFA, not just the school in which they are enrolled.	 Multi-site SFAs SFAs that utilize CEP SFA-wide (at all schools within the SFA) Those with students who travel across wards to attend school 		
Allowing students to pick up meals within a GROUP of sites within the SFA, not just the school in which they are enrolled.	 Multi-site SFAs SFAs that have a combination of CEP and non-provision schools Those with students who travel across wards to attend school 		
Allowing students to pick up meals at partner SFAs, not just the SFA in which they are enrolled.	 Single and multi-site SFAs Those with students who travel across wards to attend school 		

School Meal Programs Alternate Distribution Methods

POS and Claiming

SFAs <u>must</u> establish internal POS protocols to ensure meals are being picked up by students (or parents/guardians) enrolled within the SFA (or partner SFAs if applicable), and that duplicate meals are not served. POS must be taken at the point of distribution. If multiple days' worth of meals are distributed, meals should be accounted for on the day they intend to be consumed. Meals cannot be claimed for reimbursement on a day prior to the distribution of the meal. POS protocols <u>must</u> be reviewed often, and no less than monthly, to assess accuracy.

SFAs <u>must</u> also establish internal processes to ensure that the number of meals served across all sites does not exceed students in attendance at all sites. Attendance guidance for the 2020-21 school year can be found <u>here</u>.

SFAs may decide whether to claim meals at the site at which they are distributed, or at the site in which the student is enrolled. One method should be chosen to maintain consistency. Either way, meals <u>must</u> be claimed at the proper eligibility rate, regardless of which location they are distributed. Meals served to students enrolled in a CEP school must be claimed at the school's CEP eligibility rate. Meals served to students at non-CEP schools must be claimed at the appropriate free, reduced-price, or paid eligibility.

Updates and revisions to internal processes should be made as often as necessary. Examples of processes for each alternate distribution method are included below.

Meal pick-up at any site within the SFA

SFAs may allow students to pick up meals at any site within their SFA, provided that meals are accounted for and claimed properly. This method can be used by all SFAs with multiple sites but is highly recommend for those utilizing CEP in all schools.

Example POS and claiming procedures:

- OSSE School District allows students (or parent/guardians) to pick up meals at any site within the SFA.
- At the POS, the student (or parent/guardian) confirms enrollment in the SFA, and that they have not yet received meals for the days they are picking up for.
- Meals are distributed.
- Meals are accounted for. If multiple days' worth of meals are picked up at one time, meals are accounted for on the day in which they are intended to be consumed.
 - SFAs that utilize CEP at all sites take accountability on a daily meal count form.
 - O SFAs that have non-CEP sites take accountability by student PIN or roster.
- At the end of each week, edit checks are reviewed to ensure the number of each type of meal served daily does not exceed the number of students in attendance daily. For example, if 100 students are in attendance on a particular day, no more than 100 breakfast meals and 100 lunch meals can be reimbursed for that day.
- Edit checks are utilized to consolidate meals served, complete, and submit the monthly claim for reimbursement.

Meal pick-up at a group of sites within the SFA

Alternatively, SFAs may allow students to pick up meals at a group of pre-determined sites within their SFA, provided that meals are accounted for and claimed properly. This method can be used by all SFAs with multiple sites but is highly recommended for those with both CEP and non-provision schools if allowing students to pick up meals at all sites produces accountability challenges.

Meal pick-up at any partner SFA

SFAs may allow students to pick up meals at any site within their SFA or partner SFAs, provided that meals are accounted for and claimed properly. This method can be used by all SFAs but is highly recommend for those with students traveling to the school location from other parts of the city. This method requires extensive coordination between SFAs. SFAs <u>must</u> enter a Memorandum of Understanding (MOU) including the confidentiality requirements under the regulations implementing the NSLA. This distribution method should only be advertised to families once all details of the partnership have been confirmed between the participating SFAs.

Example POS and claiming procedures:

- 1. School A, School B, and School C enter a MOU, allowing students (or parent/guardians) to pick up meals at any site within the three SFAs.
- 2. At the POS, the student (or parent/guardian) confirms enrollment in one of the SFAs, and that they have not yet received meals for the days' they are picking up for.
- 3. Meals are distributed.
- 4. Meals are accounted for by student PIN or roster. If multiple days' worth of meals are picked up at one time, meals are accounted for on the day in which they are intended to be consumed.
- 5. Partner SFAs share POS documentation for meals served to students enrolled in other SFAs.
- 6. POS documentation is incorporated into edit checks.
- 7. At the end of each week, each SFA reviews their own edit checks to ensure the number of each type of meal served daily does not exceed the number of students in attendance daily. For example, if 100 students are in attendance on a particular day, no more than 100 breakfast meals and 100 lunch meals could be served that day.
- 8. Edit checks are utilized to consolidate meals served, complete, and submit the monthly claim for reimbursement. Each SFA only claims meals served to students enrolled in their SFA.

Program Monitoring

SSO

SFAs operating the SSO <u>must</u> complete one self-monitoring review for each site operating the SSO. If onsite monitoring is not possible, SFAs may conduct these on-site monitoring reviews offsite through a desk audit. SFAs can use the SSO site review form found here, or develop their own monitoring form.

SFSP

Monitoring requirements for SFSP are as follows. SFAs can use the SFSP site review form found <u>here</u>. Site reviews can be completed virtually or in-person.

- Sites that participated in SFSP prior to August 2020 <u>must</u> receive one site review between November 2020 and March 2021.
- New SFAs that joined SFSP between August and November of 2020 <u>must</u> complete one site review for each site before Jan. 29, 2021.
- New sites added to SFSP after November 2020 <u>must</u> receive one site review within the first four weeks of operation.

School Meal Programs

Annually, SFAs with more than one school must conduct on-site lunch program reviews for each school, and on-site breakfast program reviews for at least half of the schools by Feb. 1. The onsite monitoring requirements have not been waived for the 2020-21 school year, but the due date has been extended through the end of the school year. SFAs with more than one school must monitor all lunch programs and at least half of breakfast programs by the end of the 2020-21 school year. If on-site monitoring is not possible, SFAs may conduct these on-site monitoring reviews offsite through a desk audit. The review forms can be found here.

The afterschool snack program <u>must</u> be reviewed within the first four weeks of operation, and again within six months. The afterschool snack monitoring form can be found <u>here</u>. To ensure program integrity through the 2020-21 school year, SFAs <u>must</u> plan to conduct these required program reviews. SFAs may conduct these monitoring reviews offsite through a desk audit.

Student Eligibility

Free and Reduced-price Meal (FARM) applications

Annually, children and families who attend schools that participate in the NSLP and do not attend CEP schools should submit a meal benefit application (commonly known as FARM application) to determine if those students qualify for free or reduced-priced meals. Regardless of their FARM status, students can receive a meal at an open, free meal site, but being identified as FARM-eligible is critical for eligibility to Pandemic Electronic Benefit Transfer (P-EBT) and other programs. Many families have experienced a loss in earnings and have not considered applying for FARM because their children are not attending school in person. Broad and targeted outreach is needed to reach all eligible families. OSSE strongly encourages non-CEP schools to engage families and households that are not on the direct certification list to collect and process FARM applications as soon as possible. Of note, COVID-related stimulus payments do not count as income for determining FARM eligibility for the NSLP or SBP and does not need to be included in FARM applications. Similarly, COVID-related stimulus payments do not count as income for CACFP and do not need to be included in the income section of the meal eligibility form.

Eligibility carryover

The free and reduced-price eligibility carryover period is paused during SFSP/SSO operations. Eligibility carryover allows children to maintain their prior school year eligibility status for up to 30 operating days into the next school year. Schools that do not operate under the NSLP or SBP in the 2020-21 school year may begin the 30-day eligibility carryover if they transition to NSLP/SBP. This transition may occur midyear in the 2020-21 school year, or could occur in the 2021-22 school year. This includes schools that had been operating NSLP/SBP at the start of the school year, but retroactively claimed any NSLP/SBP meals as SFSP/SSO meals. Schools that had a limited number of NSLP/SBP operating days at the start of the 2020-21 school year must deduct any days where NSLP or SBP meals were served and claimed from the 30-day eligibility carryover period. These schools may resume the remainder of the eligibility carryover period if they transition back to NSLP/SBP. Additional guidance on eligibility carryover will be provided prior to the 2021-22 school year.

Verification

All LEAs that collected school meal applications during the 2020-21 school year are required to conduct verification of eligibility for free and reduced-price meals through applications. The sample size used for verification should be based on the number of applications on file as of Oct. 1, 2020. Although schools may have transitioned to SFSP/SSO operations, because school meal applications were used to establish eligibility for P-EBT, verification is still necessary and required. The verification deadline has been extended to Feb. 28, 2021. SFAs have the discretion to complete verification ahead of this deadline if they have the administrative capability to do so.

Title I

USDA and the US Department of Education are coordinating on the best ways to provide timely information to stakeholders regarding how changes in meal program operations affect Title I, similar to how they have before in prior instances (such as the implementation of CEP). The effects of school meal program changes on Title I will primarily be for the 2021-22 school year. USDA encourages stakeholders with questions to contact OSSE at Con.App@dc.gov or ED at OESE.titlei-a@ed.gov.

Food Safety Guidance

The recommendations presented below are to be used in conjunction with OSSE's <u>Health and Safety Guidance for Schools: COVID-19 Recovery Period</u> and <u>Frequently Asked Questions</u>, <u>DC Health's Phase Two Guidance for Food Distribution</u>, all relevant Mayor's Orders, and all other local and federal food safety guidelines. OSSE encourages utilizing new resources (found in the K-12 Schools section of the webpage) released in January 2021 including a <u>PPE Requirement for School Staff</u> one-pager that includes requirements for food service staff.

Food Service Employees

- Foodservice staff <u>must</u> adhere to all relevant provisions in <u>OSSE's Health and Safety Guidance for Schools: COVID-19 Recovery Period</u> and <u>CDC's Guidance for School Nutrition Professionals</u> including but not limited to physical (social) distancing, face coverings, and hand hygiene.
- Per Mayor's Order 2020-080 and OSSE's Health and Safety Guidance for Schools: COVID-19 Recovery Period, staff must wear a face covering at all times.
- Staff must wear gloves whenever handling food products and change gloves and wash hands when changing activities.
- Foodservice staff must follow all PPE requirements in Appendix B of <u>OSSE's Health and Safety</u> <u>Guidance for Schools: COVID-19 Recovery Period</u>, and as required per food safety regulation or requirements.
- Key times to wash hands include:
 - Before and after work shifts;
 - Before and after work breaks;
 - After going to the bathroom;
 - Before eating or preparing food;
 - o Before putting on and after taking off disposable gloves when preparing food
 - After blowing one's nose, coughing, or sneezing;
 - Before and after putting on, touching, or removing cloth face coverings or touching one's face; and
 - When entering and exiting a classroom or between activities.

A Healthy Food Service Environment

- Schools <u>must</u> adhere to all relevant provisions in <u>OSSE's Health and Safety Guidance for Schools:</u>
 <u>COVID-19 Recovery Period</u> and <u>CDC's Guidance for School Nutrition Professionals</u> including but not limited to physical (social) distancing, face coverings, and hand hygiene.
- Students must wash hands before and after eating, and may not share utensils, cups, or plates.
- Institute measures to physically separate and increase distance between employees, volunteers, other coworkers, students, and their families, such as:
 - Plan menus, production, and food preparation schedules to allow employees to maintain the recommended physical (social) distance of 6 feet while working when possible.

- Use tape to mark 6-foot workstations (boxes or stripes on the floor) in the kitchen, food service, and food delivery points where interactions with students or their families occur, if possible.
- Stagger shifts, start times, and break times as much as possible.
- Inform and remind third-party delivery drivers and any suppliers about social distancing, face covering, and hand hygiene requirements.
- Tables and chairs must be cleaned and sanitized before and after each meal.
- Routinely clean, sanitize, and disinfect surfaces and objects that are frequently touched such as kitchen countertops, cafeteria and service tables, door handles, carts, and trays.
- Conduct frequent cleaning of entrances, rest areas, and other common areas, focusing on surfaces and objects that are touched by multiple people.

Meal Distribution

- To the extent feasible, allow students to eat lunch and breakfast outdoors or in their classrooms rather than mixing in the cafeteria. If not possible, then stagger lunch by class and/or divide outdoor eating area by class ensuring that students remain at least 6 feet apart in food service lines and at tables while eating. Clean and sanitize between groups.
- Schools must prepackage meals, including silverware, napkins, and seasonings, or serve meals individually plated while ensuring the safety of students with food allergies.
- To the extent feasible, if schools are providing grab-and-go meals to families, schools should implement a plan for curbside pickup of meals or contactless delivery service (if possible) to minimize contacts with students and their families, when possible.
- No food preparation booths or sampling of food.
- Ensure food products are protected from contamination by limiting student contact.
- Cease use of any food or beverage self-service stations, such as hot bars and salad bars, not including whole product. Grab and go meals that are not shelf stable should be placed in a refrigerator within two hours and stored under 41 degrees Fahrenheit. Foods should be reheated to 165 degrees Fahrenheit before consumption. Additional reheating instructions can be found here. Foods that are known as "shelf-stable" can be stored at room temperature for an extended period of time (e.g., cereal, graham crackers, raisins).

Meal Service

- Ensure students do not share food or utensils. This helps prevent the spread of COVID-19 for all students and helps ensure the safety of <u>children with food allergies</u>.
- Use disposable food service items (e.g., utensils, dishes). If disposable items are not feasible or
 desirable, ensure that all non-disposable food service items are handled with gloves and washed
 with dish soap and hot water or in a dishwasher. Individuals should wash their hands after removing
 their gloves or after directly handling used food service items.
- If food is offered at any event, have pre-packaged boxes or bags for each attendee instead of a buffet or family-style meal.

- Students may bring lunches from home. Keep each student's belongings such as lunches separated from others' and in individually labeled containers, cubbies, or areas. Communication with families about cleaning items brought from home is recommended.
- Schools must ensure adherence to students' 504 plans and Anaphylaxis Action Plans, including ensuring that students are not exposed to foods to which they are allergic.

Serving Fresh Produce

There are many ways schools can safely serve fresh produce as a part of their meal programs. Food safety for fresh produce and strategies for offering a variety of fresh fruits and vegetables are listed below. See the Fresh Fruit and Vegetable Program (FFVP) section for additional guidance specific to that program.

Fresh Produce Safety

- Currently there is no evidence to support transmission of COVID-19 associated with food, including fresh produce.
- CDC guidance recommends rinsing fruits and vegetables under running tap water, including those with skins and rinds that are not eaten (e.g., oranges). Scrub firm produce, such as apples or potatoes, with a clean produce brush.
- Serve produce that is evenly colored and firm all the way around.
- For general food safety recommendations, see the Food Safety Guidance section of this document.

On-site Service

- Individually package or pre-plate prepared produce like orange wedges or chopped peppers.
- Check the DoD Fresh catalog for pre-packaged items such as sliced apples and baby carrots.
- Pre-portion and package servings of popular produce items like cherry tomatoes and strawberries.
- Find information on nutrition, storage, and handling for a variety of produce at the <u>Produce for Better Health Foundation</u> website.

Meals for Students Engaged in Distance Learning

- If providing meals for multiple days, send a menu indicating to eat fresh produce before frozen or shelf-stable items.
- Whole hand-fruit, like apples and pears, are easy to transport and do not require additional preparation once at home.
- Preserve meal quality. Provide pre-made salads with dressings packed separately from the salad greens or sandwich vegetables packed separately from the bread with instructions for how to prepare the salad or sandwich at home.

Procuring Local Food

Local food is especially important when national and global food systems are disrupted by large-scale events like a public health emergency. Buying from local growers and processors not only supports our regionally economy, it also helps schools have reliable access to local produce, dairy, and proteins. See below for recommendations for procuring local food during COVID-19.

- Use OSSE's <u>Choose What's in Season poster</u> to determine which local food are in season throughout the year.
- Review OSSE's <u>Is That Local? resource</u> for guidance on what is considered "local" and "unprocessed" per the Healthy Schools Act of 2010.
- Find contact information for regional growers that have sold locally grown and processed products to DC schools on the <u>Locally Grown and Unprocessed Food Item Tracking Log.</u>
- Search for local growers and processors in the DC region by using the resources listed in OSSE's Strawberries & Salad Greens Day Resource Packet for Schools.
- Reach out to your distributors for help in sourcing local food items.
- Order local produce through the DoD Fresh Fruits and Vegetable Program.
- Review your FSMC or vendor contract for requirements related to local procurement or farm to school practices.
- Guidance for safely incorporating school garden produce into your meal program is available through OSSE's School Garden Program.
- Implement a "Meatless Mondays" campaign or any equivalent meatless day program.
- For more information about procuring local food during COVID-19, see this resource from the National Farm to School Network.

Formal Contract Procurement

Food Service Management Companies (FSMC), Vended Meal, and Emergency Contracts <u>USDA's Nationwide waiver of FSMC duration in the NSLP and SFSP extension</u> allows SFAs and SFSP sponsors to extend contracts with existing FSMCs that would not otherwise be eligible for extension through the 2021-22 school year or June 30, 2022, whichever is later.

Due to the need to secure contracts without delay, SFAs and SFSP sponsors with FSMC contracts expiring in the 2020-21 school year may use the emergency noncompetitive proposal procurement method to negotiate a new one-year contract for the 2021-22 school year. To ensure program integrity moving forward, contracts resulting from such noncompetitive proposals may not exercise renewal options.

Vended meal contracts have no explicit federal regulatory limit on renewals; therefore, this federal waiver extension is not necessary for vended meal contracts. OSSE grants authority to SFAs and SFSP sponsors to extend contracts with existing vended meal providers that would otherwise not be eligible for extension through the 2021-22 school year or June 30, 2022. Such extensions must be documented, such as with a signed option year renewal.

SFAs and SFSP sponsors not required to follow District of Columbia procurement rules (including public charter schools and participating private schools) may move forward utilizing this waiver extension.

Conversely, District agencies operating as SFAs or SFSP sponsors (DC Public Schools, Department of Youth Rehabilitation Services, and Department of Parks Recreation) are required to follow District regulations, which generally limit the length of procurements to five years. (27 DCMR 2000.1; 5E DCMR 3710.1). These SFAs and SFSP sponsors should consult with their procurement officer prior to utilizing any waiver extension authorized by USDA's policy guidance.

Local Wellness Policies

Local education agencies (LEAs) that adopted Local Wellness Policies (LWPs) in 2017 were required to complete a triennial assessment of their LWP by June 30, 2020. USDA established a nationwide waiver to support schools unable to complete the triennial assessment by June 30, 2020 due to school closures as a result of coronavirus (COVID-19). All LEAs that accepted the waiver have a new due date for assessment of June 30, 2021.

ivegulation	What is Waived	Programs	Expiration Date
the state agency eir acceptance of a lear extension for leting the Local less Policy triennial	Allows LEAs to postpone completion of their Local Wellness Policy triennial assessment for one calendar year, and requires that the submission in 2021 include a description detailing how participation in the waiver assisted the LEA in providing improved services to its	NSLP SFSP	June 30, 2021
	res that LEAs the state agency eir acceptance of a ear extension for leting the Local less Policy triennial sment	Allows LEAs to postpone completion of their Local Wellness Policy triennial assessment for one calendar year, and requires that the submission in 2021 include a description detailing how participation in the waiver assisted the LEA in providing improved services to its	res that LEAs The state agency It is acceptance of a lear extension for leting the Local less Policy triennial

USDA did not extend the June 30, 2020 deadline for LEAs to notify OSSE of their intention to implement the LWP waiver flexibilities. OSSE encourages all LEAs that did not utilize the one-year waiver to complete the triennial assessment as soon as possible. This is the first triennial assessment that LEAs have been required to submit, and OSSE stands ready to support LEAs with their submissions. Under normal circumstances, deficiencies including the triennial assessment must be addressed through corrective action to bring LEAs into compliance.

Any LEAs with questions, concerns or seeking additional information and support with triennial submissions may contact OSSE.SchoolHealth@dc.gov citing "Triennial Assessment" in the subject line.

Program Applications

SFAs <u>must</u> submit NSLP applications (inclusive of the SBP, ASSP, and SSO) for the 2020-21 school year via <u>Orchard</u>. Applications were due Aug. 31, 2020. If an application has not yet been submitted it should be submitted ASAP. Instructions for how to complete the application can be found <u>here</u>. Additional details specific to the 2020-21 school year are included below:

- If sites are not actively serving meals, the site should be updated to "inactive" status including corresponding dates and reasons. If a site is "inactive", it must be updated to "active" prior to resuming meal service.
 - SFAs can make this change under Site Management → Site Information → General Tab
- SFAs can amend applications and elect to participate in SSO if it was not originally elected.
 - Instructions on how to complete the SSO application can be found in Chapter 12, Lesson
 3 of the NSLP Application 2020-21: Self-Guided Resource

SFAs that participated in SFSP during summer 2020 may resume SFSP operations for Fall 2020 by updating their SFSP application in Orchard and the SFSP Waiver Registration. The updated application must include current information including meal service sites and meal operations details. The waiver registration must reflect the waiver options that will be utilized during fall 2020. All SFSP meal site operations must conclude no later than Dec. 31, 2020. Contact SFSP Coordinator Shaneka King at Shaneka.King1@dc.gov, for assistance with SFSP.

Civil Rights

The And Justice For All (AJFA) poster must be prominently displayed in all facilities and locations that distribute program benefits or administer services. Due to COVID-19, if printed 2019 AJFA posters are not available for display, <u>paper copies</u> may be substituted as necessary, including the use of the 2015 AJFA poster, if new (2019) posters have not been received. Meals delivered from stationary vans or buses should display the AJFA poster. For vehicles making door-to-door deliveries at homes and businesses, the AJFA poster does not need to be displayed.

In situations where students are eating meals in the classroom rather than the cafeteria, schools do not need to display an AJFA poster in every classroom. It is not feasible or cost-effective to require that each classroom in a school display an AJFA poster. Instead, schools can display posters in prominent locations throughout the school, such as a bulletin board in the main building entrance, the school office, or another area frequently visited by parents and children.

If you have any further questions or concerns, please reach out to <u>OSSE's nutrition programs team</u> for more information or visit the <u>OSSE nutrition page</u>.