



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

(Updated Sept. 8, 2020)

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 coronavirus.dc.gov. 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.**

Table of Contents

Reimbursable Meal Programs.....	2
Unanticipated School Closures	2
Table 1. Reimbursable Meal Programs and Meals Served by Times of Operation	2
Waivers and Flexibilities.....	4
Table 2. USDA Meal Waivers Applicable to the 2020-21 School Year	4
Waiver and Flexibility Guidance	5
Electing the Use of Waivers	5
Meal Service.....	5
Table 3. Examples of Serving and Distributing Meals by Schedule	6
Fresh Fruit and Vegetable Program (FFVP)	10
Counting and Claiming.....	11

SFSP and SSO.....	11
School Meal Programs (SBP, NSLP, ASSP)	11
Table 4. School Meal Programs Distribution Methods	12
School Meal Programs Alternate Distribution Methods	12
Program Monitoring	14
Food Safety Guidance	14
Serving Fresh Produce	16
Procuring Local Food.....	17
Local Wellness Policies	18
Program Applications.....	18
Civil Rights.....	19

Reimbursable Meal Programs

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

SFAs should use the SBP, NSLP, ASSP and CACFP to serve meals during the 2020-21 school year, regardless of whether students are physically in school or engaged in distance learning. SFAs may use the SFSP or SSO to serve meals through Dec. 31, 2020 only, or until funding runs out, per USDA. Should it be required that the SFSP and SSO options be terminated prior to Dec. 31, 2020, OSSE will inform program participants as soon as we are made aware. Meals must follow the applicable meal pattern (unless a waiver has been approved, additional details below) and must be served and claimed at the appropriate student eligibility status including free, reduced, or paid, or Community Eligibility Provision (CEP) status, when applicable.

Unanticipated School Closures

Prior to June 30, 2020, the United States Department of Agriculture (USDA) considered transitions to distance learning due to COVID-19 as unanticipated school closures and allowed for meals to be served at open feeding sites via the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO). As of July 1, 2020, USDA no longer considers distance learning due to COVID-19 as an unanticipated school closure. If a change in circumstance causes planned instruction (virtual and/or in-person) to cease completely, an unanticipated school closure has occurred, and SSO or SFSP may be operated. 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
	School Breakfast Program (SBP)	Breakfast

Operational School Days <ul style="list-style-type: none"> Includes in-person and distance learning 	National School Lunch Program (NSLP)	Lunch
	Afterschool Snack Program (ASSP) <i>Afterschool, provided there is an activity offered</i>	Snack
	At-Risk Child and Adult Care Food Program (CACFP) <i>Afterschool, provided there is an activity offered</i>	One meal (breakfast, lunch, or supper) and one snack (AM or PM)
	Summer Food Service Program (SFSP) <i>Only allowable through Dec. 31, 2020</i>	<ul style="list-style-type: none"> 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
	Seamless Summer Option (SSO) <i>Only allowable through Dec. 31, 2020</i>	
Non-Operational School Days <ul style="list-style-type: none"> Professional development days Breaks during the school year Weekends 	At-Risk Child and Adult Care Food Program (CACFP) <i>Activities must be offered</i>	One meal (breakfast, lunch, or supper) and one snack (AM or PM)
Summer <ul style="list-style-type: none"> May – September for traditional school calendars Allowable through Dec. 31, 2020 Non-Operating days including weekends 	Summer Food Service Program (SFSP) Seamless Summer Option (SSO)	<ul style="list-style-type: none"> 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
Unanticipated School Closures <ul style="list-style-type: none"> Resulting from emergencies (e.g., hurricane; note: virtual or distance learning due to COVID-19 is NOT an eligible emergency after June 30, 2020) October – April 		
Student Vacations for Year-Round Schools ONLY <ul style="list-style-type: none"> SFSP: 15 days or more SSO: 10 days or more <p><i>*See Non-Operational School Days and Summer above for meal options during student vacations for traditional school year programs</i></p>		

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 (6/30/21)	Requires that participants consume meals on-site in the child nutrition programs.	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	June 30, 2021
Non-congregate Feeding (12/31/20)			SFSP SSO	Dec. 31, 2020
Meal Service Time Flexibility (6/30/21)	Requires meals be served at specific times.	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	June 30, 2021
Meal Service Time Flexibility (12/31/20)			SFSP SSO	Dec. 31, 2020
Parent/ Guardian Meal Pick-up (6/30/21)	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	June 30, 2021
Parent/ Guardian Meal Pick-up (12/31/20)			SFSP SSO	Dec. 31, 2020
Meal Pattern Flexibility (6/30/21)	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 case-by-case basis.	SBP NSLP ASSP CACFP	June 30, 2021
Meal Pattern Flexibility (12/31/20)			SFSP SSO	Dec. 31, 2020

Offer Versus Serve (OVS) Flexibility for Senior High Schools	Require that offer versus serve be implemented in all senior 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 by Feb. 1 annually.	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 must 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 [here](#). 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 must 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 Shaneka.King1@dc.gov with questions regarding the SFSP waivers.

Meal Service

On-Site

To the extent feasible, schools should allow students to eat in their classrooms 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 to their classroom, also stagger trips to the cafeteria by class.

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. We also often refer to this as “grab and go.” Utilize these [breakfast in the classroom](#) and [grab and go to the classroom](#) resources to plan for operationalizing meals in the classroom.

Meal Service Times

SFAs can establish meal times and service lengths that best support streamlined 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 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 **must** 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 **must** 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
<p>Any combination of in-person, hybrid, or virtual learning schedules. For example:</p> <ul style="list-style-type: none"> Student is distance learning 5 days a week; OR Student is on-site 2 days a week, and distance learning 3 days a week 	<p>Operational & Non-Operational Days/Weekends</p> <ul style="list-style-type: none"> 7 Breakfast (SFSP or SSO)* 7 Lunch (SFSP or SSO)* <p>*Only allowable through Dec. 31, 2020</p>	<p>Monday:</p> <ul style="list-style-type: none"> Student or parent/guardian picks up three days’ worth of meals (6 meals in total) <p>Thursday:</p> <ul style="list-style-type: none"> Student or parent/guardian picks up four days’ worth of meals (8 meals in total)
<ul style="list-style-type: none"> Student is on-site Monday & Tuesday 	<p>Operational Days</p> <ul style="list-style-type: none"> 5 Breakfast (SBP) 5 Lunch (NSLP) 	<p>Monday:</p> <ul style="list-style-type: none"> Breakfast and lunch served in the classroom

<ul style="list-style-type: none"> • Student is distance learning Wednesday – Friday • Activities are offered after school, and Saturday – Sunday (can be offered in a virtual or non-congregate setting) <p><i>(A similar meal distribution could be implemented for students distance learning Monday – Wednesday and on-site Thursday and Friday.)</i></p>	<ul style="list-style-type: none"> • 5 Supper (CACFP) <p>Non-Operational Days/Weekend</p> <ul style="list-style-type: none"> • 2 Lunch (CACFP) • 2 Snack (CACFP) 	<ul style="list-style-type: none"> • Supper served grab-and-go to take home <p>Tuesday:</p> <ul style="list-style-type: none"> • Breakfast and lunch served in the classroom • Supper served grab-and-go to take home • Student or parent/guardian picks up three days’ worth of meals for remaining operational days (9 meals in total) <p>Friday:</p> <ul style="list-style-type: none"> • Student or parent/guardian picks up two days’ worth of weekend meals (4 meals in total)
<ul style="list-style-type: none"> • Student is distance learning 5 days a week • Activities are offered after school (can be offered in a virtual or non-congregate setting) 	<p>Operational Days</p> <ul style="list-style-type: none"> • 5 Breakfast (SBP) • 5 Lunch (NSLP) • 5 Snack (ASSP) 	<p>Monday:</p> <ul style="list-style-type: none"> • Student or parent/guardian picks up three days’ worth of meals (9 meals in total) <p>Thursday:</p> <ul style="list-style-type: none"> • Student or parent/guardian picks up two 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 must 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 as 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 must have a plan in place to ensure accurate accountability and verify that adults have eligible children. Plans must include a process to ensure that meals are distributed only to parents or guardians of eligible children and must 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 must 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 must 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 must 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 must 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 must ensure data is 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 must 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 [DC Healthy Schools Act nutrition standards](#) already include the standards for whole grains and milk, so SFAs in DC should only be impacted by the requirement to meet [sodium target 2 weekly sodium levels](#). 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 [this notification](#) 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 SFA's 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.

Please note, OSSE can only waive the requirement that two or more varieties of milk are offered for the SSO. OSSE does not have the authority to waive this requirement for the NSLP.

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 co-mingled 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 must ensure adherence to [OSSE's health and safety guidance](#) 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 must 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 must 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 (RFP). If SFAs and their FSMCs require changes to the menu to meet modified school meal service methods due to safety concerns, SFAs must 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 during the 2020-21 school year and serve both students in the school building and those distance learning. Once approved, SFAs utilizing the non-congregate feeding and meal service time waivers detailed above to distribute meals, may also utilize these waivers to serve the FFVP. For example, with approved waivers, SFAs can provide fresh fruits and vegetables to students engaged in distance learning in non-congregate settings, including grab and go and home delivery.

In addition to the non-congregate feeding and meal service time waivers, DC has been approved for two FFVP specific waivers, detailed below. Both statewide waivers are in effect through June 30, 2021 and SFAs may begin distributing FFVP foods on the first instructional day of the 2020-21 school year. To request use of these waivers for FFVP, email [Kimberly Thompson](#). 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.

With approved waivers, elementary schools providing multiple days' worth of meals at one time may also provide multiple servings of FFVP foods at one time. For example, sites may permit children to pick up a week's worth of FFVP fruits and vegetables or sites may permit a week's worth of FFVP to be delivered to a children's place of residence. As a reminder, students must be enrolled in a school operating the FFVP to participate in the program.

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 service

provided in a distance learning environment. Therefore, providing nutrition education lessons with the FFVP is encouraged, but not required for students engaged in distance learning. 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 [Accountability and Collection Procedures](#) 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 [daily meal count form](#). 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.

School Meal Programs (SBP, NSLP, ASSP)

Accountability processes for providing meals to students attending non-provision schools must 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 [daily meal count form](#).

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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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.	<ul style="list-style-type: none"> 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 must 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 must be reviewed often, and no less than monthly, to assess accuracy.

SFAs must 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 [here](#).

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 must 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.
 - 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 must 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 must complete one self-monitoring review for each site operating the SSO. If an on-site 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.

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 been waived for the 2020-21 school year. SFAs should, but are not required to, continue monitoring program activities off-site, through desk audits, to the maximum extent possible. The review forms can be found [here](#).

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

Food Safety Guidance

- The recommendations presented below are to be used in conjunction with OSSE's [Health and Safety Guidance for Schools: COVID-19 Recovery Period](#) and [Frequently Asked Questions, DC Health's Phase Two Guidance for Food Distribution](#), all relevant Mayor's Orders, and all other local and federal food safety guidelines.

Food Service Employees

- Foodservice staff must adhere to all relevant provisions in [OSSE's Health and Safety Guidance](#) and [CDC's Guidance for School Nutrition Professionals](#) including but not limited to physical (social) distancing, face coverings (face masks), and hand hygiene.
- Per [Mayor's Order 2020-080](#) and [OSSE's Health and Safety Guidance for Schools](#), 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 [OSSE's Health and Safety Guidance for Schools](#), 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 using the restroom
 - Before eating or preparing food
 - Before putting on and after taking off disposable gloves when preparing food
 - After touching objects with bare hands which have been handled by other staff, customers or visitors, such as tables, trays, carts, racks, dishes, cups, utensils, bags, coolers, totes, and trash
 - After blowing their nose, coughing, or sneezing; and
 - After putting on, touching, or removing cloth face coverings.

A Healthy Food Service Environment

- Schools must adhere to all relevant provisions in [OSSE's Health and Safety Guidance](#) and [CDC's Guidance for School Nutrition Professionals](#) including but not limited to physical (social) distancing, face coverings (face masks), 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 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 the 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, employee break rooms, 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 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, cleaning and sanitizing between groups.
- Prepackage meals, including silverware, napkins, and seasonings, or serve meals individually plated while ensuring the safety of children with food allergies.
- 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.
- Minimize bare hand contact with any food products.
- 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

- 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 [Produce for Better Health Foundation](#) 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 [Choose What's in Season poster](#) to determine which local food are in season throughout the year.
- Review OSSE's [Is That Local? resource](#) 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 [Locally Grown and Unprocessed Food Item Tracking Log](#).
- 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.

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.

Waiver	Regulation	What is Waived	Programs	Expiration Date
Local School Wellness Policy Triennial Assessments	Requires that LEAs notify the state agency of their acceptance of a one year extension for completing the Local Wellness Policy triennial assessment	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 community	NSLP SFSP	June 30, 2021

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 must submit NSLP applications (inclusive of the SBP, ASSP, and SSO) for the 2020-21 school year via [Orchard](#). 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 [here](#). 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, [paper copies](#) 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 [OSSE's nutrition programs team](#) for more information or visit the [OSSE nutrition page](#).