



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

Questions and Answers Related to COVID-19: LEA Meal Provision

Background

As a part of the District of Columbia's response to the coronavirus (COVID-19) outbreak in the United States, the Office of the State Superintendent of Education (OSSE) modified, updated and re-circulated certain policies through the [Policy Updates Related to COVID-19: LEA Meal Provision Guidance](#) document. Following the release of this guidance, OSSE received questions from local education agencies (LEAs) and school food authorities (SFAs) related to meal provision.

Purpose

To answer questions from, and support detailed policy guidance to, LEAs and SFAs about meal provision during unanticipated school closures due to coronavirus (COVID-19).

General Guidance

Q1: Where can I learn more about the DC state of emergency declaration?

A: On Wednesday, March 11, 2020, Mayor Muriel Bowser declared both a state of emergency and a public health emergency. On Friday, March 20, 2020, Mayor Muriel Bowser issued Mayor's Order 2020-050: Extensions of Public Emergency and Public Health Emergency: Coronavirus (COVID-19). For more information about this declaration, you can view the full Declaration of Public Emergency [here](#).

Q2: Where can I learn more about District essential services that will continue operating? For example, is Metro still offering Kids Ride Free services?

A: The District government wants residents to know that it will continue to deliver essential services and keep the majority of its systems and services operating. View a list of available services and what is open on the DC coronavirus website at coronavirus.dc.gov/page/whats-open.

General Meal Provision Guidance

Q3: Where can I get information about central food distribution locations other than at LEAs?

A: Information about food distribution locations can be found at <https://coronavirus.dc.gov/food>. This resource will be updated regularly, so please check back frequently.

Q4: Where can I find current information about LEAs providing meals, including supper, and the location of those sites?

A: Information about LEA meal location sites is posted on <https://coronavirus.dc.gov/food>. The information will be updated regularly and include new meal sites, so please check back frequently.

Program Options – Seamless Summer Option (SSO) and Summer Food Service Program (SFSP)

Q5: How can an SFA serve meals during unanticipated school closures?

A: SFAs have two options to serve meals during unanticipated school closures.

1. SFAs may serve and be reimbursed for meals through the Seamless Summer Option of the National School Lunch Program (NSLP). See the [SSO Quick Reference Guide](#) to amend an application.
2. The six SFAs approved to serve meals in 2019 through the Summer Food Service Program may serve and be reimbursed for meals by amending their current application. See the [SFSP Quick Reference Guide](#) to amend an application. SFAs without a 2019 approved SFSP application may complete a 2020 SFSP application.

Q6: Can 2019 SFSP sponsors serve at additional sites that were not included in the original application?

A: Possibly. Please reach out to [OSSE's SFSP Program Coordinator](#) for further guidance.

Q7: Can we offer meals under the standard National School Lunch Program (NSLP) during periods of school closure?

A: No. Meals cannot be served under the standard NSLP during periods of school closure.

Q8: Can SFAs and sponsors operate SFSP or SSO programs if the school facilities are closed but remote instruction is provided?

A: Yes. If the building is closed and students cannot attend their physical school location for classes, SFAs and sponsors may operate SFSP or SSO programs as permitted under program requirements even when remote instruction is provided.

Q9: Do SFAs and sponsors have to operate open sites or can they operate a closed site?

A: Closed sites have specific requirements and may be considered upon request. Please reach out to an [OSSE nutrition program specialist](#) to discuss this option further.

Q10: My SFA plans to operate at only some of our sites. Is it allowable for students who attend schools without an open site to be redirected to the open sites?

A: Yes. We encourage SFAs to direct children to sites serving meals.

Meals:

Q11: Can meals be served on the weekends and receive USDA reimbursement?

A: No, meals cannot be served on the weekends and receive USDA reimbursement.

Q12: Are meals served through SFSP and SSO required to follow the NSLP meal pattern?

A: OSSE strongly encourages SFAs and sponsors to maintain and meet the nutrition standards for each program to the greatest extent possible. If there are specific and justified reasons the meal pattern cannot be met based on disruptions to the availability of food products resulting from unprecedented impacts of COVID-19, OSSE may waive the requirement that meals meet meal pattern requirements.

In order for OSSE to waive meal pattern requirements, SFAs and sponsors must amend and re-submit their SFSP or SSO applications. Amended applications must include the specific food component that cannot be met, including justification. OSSE may approve requests on a case by case basis. Approvals to waive meal pattern requirements remain in effect until April 30, 2020 or the expiration of the federally declared public health emergency, whichever is earlier.

Q13: What can SFAs and sponsors operating open and restricted open sites do if they have difficulty implementing the age/grade/group requirements?

A: Consult with their [OSSE nutrition program specialist](#) regarding possible accommodations.

Accommodations:

- May include using a single age/grade group meeting the minimum meal pattern requirements for the most common age/grade group attending the site.
- Must possess a reasonable justification for the need to deviate from age/grade group requirement.
- May only apply to open and restricted open sites where meals are served to all children in the community on a first-come/first-served basis.

Q14: What can I do to provide meals that meet the meal pattern and are shelf-stable?

A: 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 in the USDA policy memo [SP 21-2019 Crediting Shelf-Stable, Dried and Semi-Dried Meat, Poultry, and Seafood Products in the Child Nutrition Programs](#).

Q15: Can SFAs and sponsors serve more than one meal type and/or more than a day's worth of meals at a time?

A: SFAs and sponsors can serve and be reimbursed for serving up to two meals each day. Meals can be any combination of breakfast, lunch, AM or PM snack, or supper, EXCEPT for lunch and supper.

Additionally, SFAs and sponsors may provide up to seven days' worth of meals at one time. For example, if a site is serving breakfast and lunch, a student may pick up seven days' worth of breakfasts and seven days' worth of lunches, totaling 14 meals, at one time. SFAs and sponsors

wishing to revise their distribution method must update their SFSP or SSO application to reflect their new distribution. Food safety is of utmost importance, specifically if multiple days' worth of meals are provided. Please reference the food safety section below.

Q16: Do children need to be present to receive a meal from these programs? What about children who are symptomatic or under quarantine?

A: Per USDA regulation, children *do* need to be present to receive a meal at a SFSP or SSO site. To make this requirement less onerous, SFAs and sponsors may provide multiple meals in one visit – specifically, they may serve up to two meals each day, and OSSE has offered flexibility to provide and be reimbursed for up to seven days' worth of meals at once. Additionally, meals may be provided through home delivery. Please see the question below specific to home delivery for additional details.

If additional flexibilities surrounding a child being present are provided by USDA, OSSE will provide additional information as quickly as possible.

Q17: Many meal sites are from 10 a.m.–2 p.m., which overlaps with the timing of distance learning offered by many LEAs. Is there an opportunity to consider other times of day to have schools prioritize serving?

A: SFAs and sponsors can establish meal times and service lengths that best support non-congregate meal service in a manner that maintains health and safety standards. USDA's waiver released on March 20, 2020, allows meals to be served outside of required breakfast, lunch, supper, and snack serving times. SFAs and sponsors must update their application in Orchard to reflect new pick-up schedules or delivery plans with designated times for distribution.

We are aware that many schools are serving meals during this 10 a.m.-2 p.m. period and we encourage SFAs and sponsors to serve multiple meals (and multiple days of meals) at once to make the pick-up and potential conflict with remote instructional time less onerous.

Q18: Will meals served under SFSP and SSO during unanticipated closures related to coronavirus (COVID-19) be eligible for HSA reimbursement?

A: Yes. Breakfast and lunch meals served under SFSP and SSO are eligible for HSA reimbursement. The HSA reimbursement rate is \$0.20 for each breakfast served and \$0.10 for each lunch served. Due to the unique challenges and administrative burden posed, the \$0.05 reimbursement for locally grown and unprocessed foods will not be available during the unanticipated closures related to the coronavirus (COVID-19) response.

[Home Delivery](#)

Q19: Can schools that have been approved for non-congregate feeding through SFSP or SSO deliver meals directly to students' homes?

A: Yes. 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 desiring to deliver meals to students'

homes must update their SFSP or SSO application to reflect this new distribution method and contact their [OSSE nutrition program specialist](#) for approval. See [USDA's Q&A](#) released on March 17, 2020 and additional questions below for requirements surrounding the delivery of meals.

Q20: Can SFSP sponsors other than SFAs deliver meals to students' homes?

A: No. This option is only available to SFA sponsors of school sites due to student confidentiality and logistical requirements.

Q21: What must an SFA do before starting meal delivery at a student's home?

A: 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.

It is critical that SFAs 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 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.

Q22: How many home-delivered meals per child may be delivered at once?

A: The maximum number of meals that may be provided to each child per day remains the same as under SFSP or SSO, i.e., up to two meals, or one meal and one snack, in any combination except lunch and supper. OSSE has approved service of up to seven days' worth of meals at one time.

Q23: Do home-delivered meals need to be shelf-stable?

A: No. The type of meal offered will depend on the resources and capacity of the site. Those who can prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets food safety requirements may do so. Home-delivered meals have to meet all meal pattern requirements of the SFSP or SSO.

Q24: Does the child need to be present for home meal delivery?

A: No. As long as the school has obtained the household's written consent to deliver meals and has verified the current address, the student does not need to be present at the time of delivery. If the meals are shelf-stable, no one needs to be present, as long as the address has been verified. Please consider food safety requirements and best practices.

Q25: Who can schools deliver meals to under an open SFSP and SSO site?

A: Schools operating an open SFSP or SSO site may deliver meals to all children in their eligible area.

Q26: If a household has children in multiple schools, can the schools coordinate to provide one home delivery for all children in the household?

A: Yes. To the extent feasible, SFAs or schools are encouraged to coordinate their deliveries to make the best use of their resources.

Q27: Are there additional food safety measures that should be followed?

A: Yes. All food regardless of delivery or service method should follow proper handling, storing, and heating procedures. Cold food should be delivered below 40 degrees and hot food above 140 degrees. If the item is shelf-stable, it can be delivered at room temperature. See below for additional information regarding food safety.

Food Safety

Q28: What food safety guidance should be followed?

A: While USDA is not aware of any reports at this time of human illnesses that suggest COVID-19 can be transmitted by food or food packaging, it is always important to follow [proper hygiene practices](#) (i.e., wash hands and surfaces often, separate raw meat from other foods, cook to the right temperature, and refrigerate foods promptly) and [food safety practices](#) when handling or preparing foods.

Grab and go meals that are not consumed on-site 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).

Q29: Is there additional guidance for sites that are giving out seven days' worth of meals at a time or providing home delivery?

A: SFAs and sponsors should use the Centers for Disease Control and Prevention (CDC) guidance for storing leftovers when planning their menu. Menus should ensure that the food will last for seven days or be replaced with a [shelf-stable item](#). More information for crediting shelf-stable meat, poultry and seafood products can be found in this [USDA policy memo](#). 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. SFAs must inform students on how long each menu item can remain in the refrigerator and continue to be safe for consumption. Meals that are not consumed before the last day they can be safely stored in the refrigerator should be discarded.

Q30: Can USDA Foods be included in meals served during unanticipated school closings?

A: Yes. USDA Foods, including DoD Fresh, can be included in reimbursable meals served through SSO and SFSP during unanticipated school closings.

Applications

Q31: I applied for lunch only when I applied for SSO. Can I go back and amend to add breakfast?

A: Yes. SFAs can amend their SSO or SFSP application to include an additional meal type and make other updates as necessary.

Tracking Meals

Q32: How should SFAs and sponsors track meals served to students under the SSO or SFSP? What are the reporting requirements?

A: SFAs and sponsors must track meals on a daily basis either manually or via an electronic point of service (POS) system. These meals must be identified as being served during an unanticipated school closure under each program. Meal tracking must be inclusive of the site name, date of service, meal type(s), and number of meals served. Meal types should be tracked separately. OSSE encourages use of the template [meal count form](#).

Claiming Meals

Q33: Will SFAs have to submit a separate claim for SSO?

A: Yes. An SSO claim will need to be submitted separately from the NSLP claim. Additional guidance will be provided specific to SSO claims for reimbursement. Standard 2020 SFSP applications should be submitted.

Q34: How do I determine which rate to claim meals under when using SSO?

A: All students may be claimed as "free" under SSO.

Q35: How do I complete edit checks within the claim?

A: Edit checks are NOT a required component of the SSO or SFSP claim for reimbursement. SFAs and sponsors must ensure that meals claimed for reimbursement reflect the number of meals served. Daily point of service documents must support the claim for reimbursement.