**School Nutrition Program Meal Service**

**during Coronavirus (COVID-19) Unanticipated School Closures**

**Questions and Answers**

Effective immediately, Summer Food Service (SFSP) and Seamless summer Option (SSO) SFAs and Sponsors, in good standing, may be approved to provide meals during unanticipated school closure due to the novel Coronavirus (COVID-19) in a non-congregate setting. If you have questions that are specific to your SFA or Sponsoring organization, please contact the Summer Nutrition Program Consultant or Zone Consultant/Specialist that serves your area.

1. **Which regulatory requirements for SFSP and SSO operations may be waived for COVID-19-related operations?**

The United States Department of Agriculture, Food and Nutrition Services (FNS) has waived the requirement at 7 CFR 225.6(e)(15) that meals be served and consumed in a congregate setting, in order to support any social distancing requested by Federal, State, or local authorities.

1. **How does an SFA or Sponsor receive approval to operate during COVID-19 conditions?**

The SFA/Sponsor must first complete the electronic [Non-Congregate Meal Service Waiver Request](https://forms.office.com/Pages/ResponsePage.aspx?id=YZyehLvwg026X0tTN2ZM9-LQXK0LusBJrwrHgrPX1bVUN0IzWkxSNFNaNDVTS1FWUTZLNjVNTTAzWi4u). An electronic response will be provided by the NCDPI as quickly as possible to confirm approval of the waiver request. The SFA/Sponsor will be required to amend the annual agreement to participate in the federally assisted school nutrition programs within sixty (60) days of the approval of the waiver. The agreement amendment template is attached for your convenience.

NCDPI is unable to approve waiver requests that would duplicate meal service (more than one organization serving the same children, the same meals, etc.). Coordinated communication within various community organizations that provide emergency food assistance proposed to serve is critical.

1. **Is it mandatory that meals be provided during a school closure?**

No. However, SFAs/Sponsors are encouraged to support the needs of economically disadvantaged children for whom there may be limited access to food during extended periods of school closure.

1. **Who is eligible to receive meals when school is closed due to the Coronavirus (COVID-19)?**

The SFSP/SSO COVID-19 waiver targets children who attend schools that have been closed due to the Coronavirus. However, in eligible areas, meals may be served to all children eighteen (18) and under in the household if at least one (1) child attends the school that has been closed. For example, if a childcare center that participates in the CACFP is located in the area of a school that has closed, studentsenrolled in that center are eligible for meals provided to children attending the school that was closed.It is important to coordinate with other community to support the food and nutrition needs of children within the community.

1. **How do SFSP/SSO site eligibility requirements apply to COVID-19 meal service? Are all school/sites required to be in area eligible locations?**

For schools affected by the Coronavirus (COVID-19) by unanticipated school closure where 50 percent (50%) or more of their enrolled students are certified as eligible for free or reduced-price meals, SFAs/Sponsors may develop meal distribution methods in which meals are available to all children enrolled in that school, with a focus on serving low income children.

For schools affected by the Coronavirus (COVID-19) by unanticipated school closure with less than 50 percent (50%) of students are certified as eligible for free or reduced-price meal benefits, meal distribution methods must more directly target households of enrolled children who are eligible for free or reduced-price meals. SFAs/Sponsors shall use current free/reduced-price certification information to target low income students.

1. **Can an eligible SFA/Sponsor serve meals at sites that were not previously approved for the SSO/SFSP?**

The eligible SFA/Sponsor may serve meals at sites that were not previously approved to operate the SSO/SFSP if the site meets the eligibility requirements as indicated in question 5. SFAs/Sponsors should email their Summer Nutrition Program Reginal Consultant with a list of new sites to be added to the site application list.

1. **How many meals per child may be offered each day? May supper be provided. Can meals be distributed for more than one day? What days of the week can meals be served?**

The maximum number of meals that may be offered remains the same as under the SFSP or SSO: up to two (2) meals, or one (1) meal and one (1) snack, per child, per day, in any combination except lunch and supper for open or closed enrolled sites. SFAs/Sponsors may serve breakfast, lunch, snack or supper in any combination except lunch and supper.

NCDPI may approve a distribution approach that includes meals for multiple days for up to seven (7) days per week. NCDPI will consider the capacity of the SFAs/Sponsors to execute such an approach effectively, including meeting food safety requirements. Such distribution requires prior approval, in writing, of the NCDPI.

1. **What distribution methods are envisioned for Coronavirus (COVID-19) meal service, and what logistical issues should be considered?**

We anticipate meal distribution methods will involve pick up or delivery models in order to meet the need for social distancing during the Coronavirus (COVID-19) unanticipated school closures. All delivery methods should be documented in the SFA’s/Sponsor’s [Non-Congregate Meal Service Waiver Request](https://forms.office.com/Pages/ResponsePage.aspx?id=YZyehLvwg026X0tTN2ZM9-LQXK0LusBJrwrHgrPX1bVUN0IzWkxSNFNaNDVTS1FWUTZLNjVNTTAzWi4u) and should focus on targeting a closed school’s low-income children. Please remember to use the school’s certification data for schools where fewer than fifty percent (50%) of students are eligible for free or reduced-price meals. SFAs/Sponsors should work with stakeholders at the local level to determine the most effective distribution methods to serve the children. Such options may include using a vehicle to deliver meals based on the usual bus route, drive-thru windowsor stations, and other options that support the service safe and wholesome reimbursable meals to students.

1. **Can a parent/caregiver/sibling of a child enrolled in the closed school pick up meals for their children?**

Yes, as long as the meal distribution site has a way to verify that the person picking up meals has an enrolled child/sibling in the closed school, this would be permissible. This arrangement should be described in the SFA/Sponsor’s [Non-Congregate Meal Service Waiver Request](https://forms.office.com/Pages/ResponsePage.aspx?id=YZyehLvwg026X0tTN2ZM9-LQXK0LusBJrwrHgrPX1bVUN0IzWkxSNFNaNDVTS1FWUTZLNjVNTTAzWi4u)**.**

1. **How can a school with less than 50 percent (50%) free and reduced-price eligibility target economically disadvantaged children without overtly identifying those children as eligible for free or reduced-price meals?**

This will depend in large part on how SFAs/Sponsors intend to provide meals. The waiver request should describe their method of meal distribution. For example, meal distribution sites might be located in areas that are easily accessible to low-income children while avoiding identification of individual children as low income.

1. **What are the requirements for the meals?**

The meals must meet the regular menu planning requirements of the SFSP or SSO. Offer versus serve (OVS) will not apply and all meals must be unitized, meaning a complete reimbursable meal that meets the requirements of the menu planning method used, including milk, must be distributed. Shelf-stable milk may be used. USDA commodity foods may also be used. If availability of milk or other meal components becomes an issue, contact the summer nutrition consultant Zone Consultant/Specialist assigned to your area. The NCDPI will work with USDA for possible waivers or other flexibilities.

1. **Are SFAs/Sponsors required to accommodate documented special needs?**

Yes. Strategies to address students’ special dietary needs should be addressed in the SFA’s/Sponsor’s waiver request. SFAs/Sponsors must utilize the medical statement for meal modifications. The documents collected as a regular process in the NSLP or SFSP may be used.

1. **What are some suggested solutions for staffing sites during the Coronavirus (COVID-19) school closure?**

SFAs/Sponsors are encouraged to collaborate with a variety of school, civic, governmental and community organizations for help with serving eligible children. Some suggestions include Police and Fire Departments, hunger solution organizations, teachers, parents, high schoolers and other volunteers. Basic food safety instructions and precautions should be provided to anyone who will assist with meal delivery. (See Question 13.)

1. **With the potential for school nutrition staff shortages, and the need for students to be fed, can other staff assist with prepping and serving meals? Volunteers, teachers, etc.?**

Yes, according to the Food Code, **"Employee"** means the PERMIT HOLDER, PERSON IN CHARGE, FOOD EMPLOYEE, PERSON having supervisory or management duties, PERSON on the payroll, family member, volunteer, PERSON performing work under contractual agreement, or other PERSON working in a FOOD ESTABLISHMENT. It is prudent for the Person-in-Charge (PIC) to use the HACCP Plan new employee checklist or some other training tool with any volunteer employee to ensure some level of basic food safety instruction.

1. **Will there be any separate reporting requirements for meals served to children under the SFSP/SSO COVID-19 waiver or will the standard meal count reporting procedures apply?**

Separate meal counts and records must be maintained for meals served under a Coronavirus (COVID-19) waiver. Prior to submitting the claim for reimbursement, SFAs/Sponsors must submit site application in the School Nutrition Technology System (SNTS) and obtain approval. The SFA/Sponsor shall file claims for reimbursement for meals served in the SNTS no later than the 10th day of the month following the month in which the meals were served.

1. **Can the LEA use yellow school buses to deliver meals to students during unanticipated closure?**

Yes, LEAs may choose to use yellow school buses to deliver meals to students during periods of unanticipated school closure. Please coordinate with your Superintendent and Transportation Director to ensure compliance with laws that govern the use of yellow buses which are located at:

<https://www4.ncleg.net/enactedlegislation/statutes/html/byarticle/chapter_115c/article_17.html>

For your convenience, the following information is provided:

**G.S. 115C-242**

(6)        School buses owned by a local board of education may be used for emergency management purposes in any state of disaster or local state of emergency declared under Chapter 166A of the General Statutes.

**Executive Order 116** declares such a state of emergency under Chapter 166A of the General Statutes throughout the state and, as such, yellow school buses may be used to manage this emergency. One such possible use may be the distribution of nutrition assistance to students during a school closure or to students which are receiving instruction in an alternative setting due to the emergency. Another could be the strategic placement of buses to provide wifi hotspots for students needing internet access in order to access web-based educational opportunities. Emergency management use is not limited to these particular scenarios.

It is imperative to comply with the following:

1. The bus driver / monitor / assistant must be an employee of the county or city administrative unit and the driver be paid or authorized to be paid by that administrative unit; and
2. The LEA/ driver must be operating in accordance with the provisions of 115C-242.

 **As a reminder, Executive Order 116 does not waive CDL licensing requirements.**

**This document will be updated to reflect questions from SFAs/Sponsors as needed to ensure all are as well-informed as possible. Please submit your questions to:** Cynthia Ervin, School Nutrition Program Manager via e-mail at Cynthia.Ervin@dpi.nc.gov **.**