

GUIDANCE ON NON-CONGREGATE FEEDING DURING SCHOOL CLOSURE OR DISMISSAL DUE TO A NOVEL CORONAVIRUS OUTBREAK

AOE Continuity of Education Plan Guidance 1

March 16, 2020

Issued by the Vermont Agency of Education pursuant to the Governor's Directive of March 15, 2020



Background

This guidance is issued pursuant to Governor Scott's directive to Vermont's public supervisory unions and school districts (SU/SDs) and independent schools. This directive requires Vermont schools to dismiss by end of day on March 17, 2020 will last through April 6, 2020 -- but may very well be extended for a longer period.

Governor Scott's directive will task local districts with three key components to support the State response:

- Food and special needs services for children;
- Collaborating with the state to provide childcare options for healthcare workers and others essential to the response; and
- Systems for ensuring maintenance of education during the initial dismissal; and a continuing education plan if schools are dismissed for an extended period.

To prepare for the potential for an extended dismissal, each district must have a Continuity of Education Plan that includes:

- Meal service for those who need it;
- Services for children with disabilities and special needs;
- Working with the state to provide district-based options that meet the childcare needs of healthcare workers and other Vermonters essential to the response (EMS, Fire, LEO, National Guard personnel, etc.);
- Ensuring children have trackable work to do when schools are dismissed Tuesday; and Remote learning plan that prepares for schools to be closed for a longer period.

Under the Governor's directive, schools will remain operational for administrators, teachers and staff to sustain essential services and to plan and implement continuity of education through remote learning. The Vermont Department of Health has provided "social distancing" guidance that districts should use to ensure a healthy workplace.

Purpose

School Food Authorities (SFAs) may implement non-congregate feeding in a variety of scenarios. The following guidance is intended to help SFAs plan for the following scenarios:

[When a School Building is Closed but Still Operational \(School Dismissal\)](#)

[When School Is Closed – Use of SFSP/SSO](#)

[Logistics of Drive Through Grab-and-Go Non-Congregate Feeding](#)

[Logistics of Walk In Grab-and-Go Non-Congregate Feeding](#)

[Logistics of Home Delivery](#)

[Adult meals and other meals outside of federal child nutrition programs](#)

When a School Building is Closed but Still Operational (School Dismissal)

Meals can still be served and claimed through the National School Lunch Program (NSLP)/School Breakfast Program (SBP) if the school food authority considers the day to be a “day of operation” (7 CFR 210.7(c)). So if instructional activities are continuing to take place (via remote learning or other means), the SFA may continue to serve and claim meals under these programs. Congregate feeding is not a requirement of these programs. The SFA may also consider using the SFSP/SSO with the non-congregate feeding waiver, as these programs have a simpler meal pattern and a better rate of reimbursement. See [When School Is Closed – Use of SFSP/SSO](#) to decide which option to use. If the SFA decides that they qualify to continue using the NSLP/SBP and would prefer this method, do the following:

- At your convenience, please [notify Vermont Child Nutrition Programs](#) that you plan to use this option. We may advise you to make some changes to your site applications, however a new application is not required and you do not need to wait for state approval to use this option.
- Follow normal counting and claiming methods. Unless the school is operating Provision 2 or CEP, the names of the students who take a meal must be recorded. If paper rosters are used, ensure that these rosters do not include students’ free and reduced status. Meals will be reimbursed using the NSLP/SBP reimbursement rates based on the free, reduced, or paid status of the student who was served the meal.
- Meals must still be counted at the point of service. This means that either a food service staff member or a trained staff member or volunteer must check off or otherwise indicate when a student takes a meal. Counting meals prepared or meals not served is not an acceptable counting method.
- All meals must be unitized. A unitized meal must include all of the required components for the meal type. A unitized meal is considered “Serve.” “Offer vs. Serve” should not be used. If the school is stopping their use of Offer vs. Serve, we request that the SFA update the school’s site application to indicate that “Serve” will be the method. The SFA should make this application adjustment at their convenience, and will need to save and re-submit the application for re-approval.
- Milk choice is still required with a unitized meal. This can be accomplished in the following ways:
 - Offer meals packaged with at least 2 types of milk and allow students to select their meal;
 - Offer at least two types of milk in a crate or cooler that the students can choose from at the time they select their meal;
 - Allow students to pre-order their milk type.
- The National School Lunch Program and School Breakfast Program meal patterns should continue to be followed. Please notify [Vermont Child Nutrition Programs](#) if you are having difficulty following the meal pattern to request further guidance.
- Proper Food safety practices should be followed. Non-perishable foods are recommended, unless the meals are meant to be consumed immediately upon distribution, or the SFA has identified a way to keep hot foods hot and cold foods cold. If perishable foods are served, they should be dated with an expiration date/time.

- Please continue to follow all food safety requirements in the [Vermont Food Code](#). HACCP-based Food Safety Plans may need to be adjusted to include new procedures.
- Production records, temperature logs and other program paperwork should continue to be maintained.
- The “And Justice for All” non-discrimination poster should be posted in each area where the students receive meals. Additional posters can be requested by contacting [Child Nutrition Programs](#). These posters should be posted as soon as is practical, but lack of posters should not stop the school from implementing this service model.
- 2 meals per day (Breakfast and Lunch) may be distributed at one time, as if you were distributing sack meals for a field trip.

When a School Building is Closed and School is not in Session (School Closure)

When school is not in session and the SFA does not consider the day to be an “operational day,” the school meals programs may not operate. This includes the National School Lunch Program, School Breakfast Program, Fresh Fruit and Vegetable Program and NSLP Afterschool Snack Service. Instead, schools may utilize the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) to serve meals to students during an unanticipated school closure. Schools experiencing a dismissal (above) may also choose to use this option. **Vermont has received a waiver from the USDA on March 13, 2020 to allow for the use of non-congregate feeding in SFSP/SSO.** Vermont received a waiver from the USDA on February 21, 2020 to allow SFSP/SSO operation at school locations during an unanticipated closure.

To use SFSP, the school food authority must have an approved SFSP program agreement and application on file with the state. Summer 2020 applications are open already, so SFAs are strongly encouraged to preemptively begin submitting these applications even before a closure is announced. Schools who have not previously participated in the SFSP may still submit an application.

SSO doesn’t have a separate program agreement, it is covered under the School Meals Programs Permanent Agreement. To use this option, the SFA must amend the school meals site application to add SSO and save and re-submit the school meals application packet. A school does not need to have previously participated in SSO to use this option.

Schools who wish to take advantage of the non-congregate waiver must [email Jamie Curley or Ailynne Adams on the Child Nutrition Programs team](#) to say that they plan to use non-congregate feeding and should indicate whether they plan to do grab-and-go, household distribution, or both. A Child Nutrition Programs staff member will reply back to confirm that the permission to use non-congregate feeding is granted.

Choosing between SFSP/SSO

The Vermont Agency of Education generally recommends SFSP as the best option for most schools. The reimbursement rates for SFSP are slightly higher, and the meal pattern is simpler. However, the application process for SSO is faster, as it only requires an adjustment to the school nutrition programs site application packet to add this program, and does not require a

separate application packet and program agreement. If you are unsure of which option to select, contact [Child Nutrition Programs](#) to discuss your options.

Area Eligible Schools

[207 Vermont Schools are considered Area Eligible](#). For these schools, meals may be provided at no cost to all children age 18 and under, and all meals served are claimed at the free reimbursement rate. The number of meals provided to children should be counted, but the names of children receiving the meals do not need to be recorded.

Non-Area Eligible Schools

[114 Vermont schools are not considered Area Eligible](#). These schools may operate the SFSP as “a non-residential camp.” For these schools, meals may only be provided to students of the school. These meals should be claimed based on the free and reduced status of the student who was provided the meal. If 50% or more of the students who access the meals are eligible for free and reduced meals, the site may change to a closed-enrolled in non-needy area. In this case, all of the meals may be reimbursed at the free rate. Pending further guidance from USDA, Child Nutrition Programs will allow application packets to be adjusted based on whether or not the site hits the 50% threshold when meals are served.

USDA guidance in this area has been somewhat confusing. If a school is not area eligible and is attempting to qualify as a closed-enrolled site, USDA is requiring schools to target the availability of meals to free and reduced students, but not overtly identify these students.

USDA has not discussed claiming students by status as a non-residential camp as an option for non-area eligible sites in an unexpected closure, however Vermont Child Nutrition Programs thinks this is allowable based on how the programs operate during the summer. Schools in this situation should be aware that there is some possibility that if 50% or more of the students who eat are not free and reduced, no meals may not be claimed. In that case, the school would need to identify other funds – including general funds, donations, or some other source of funds – to cover the cost of meals served.

Another option for non-area eligible schools to consider is looking for another site in their community that qualifies based on census data, and conducting distribution as an area-eligible site from that location. These locations might be libraries, churches, community centers, or other locations. In addition, non-school non-profits who have sponsored the SFSP in a prior year may be eligible to operate area eligible sites in this situation, if the school is unable to. Contact [Child Nutrition Programs](#) to discuss your options.

We will provide updated guidance on this issue as soon as USDA issues clear guidance to the state.

General Requirements for Non-Congregate Feeding in the SFSP/SSO

Regardless of whether the site is area-eligible or not area-eligible, please follow these guidelines when implementing this option.

- Point of Service Meal Counts must be taken at the time of pick-up when meals are offered for pick-up/grab-and-go and at the time of delivery when meals are delivered.
- The Sponsor may distribute multiple meals at one time. All sponsors utilizing the non-congregate feeding option may distribute one days' worth of meals at a time (one breakfast and either one lunch or one supper). If the sponsor would like to distribute multiple days' worth of meals at one time, they must let the state agency know via email what their plan is to ensure that the number of meals will be limited to the number allowed (i.e., 5 breakfasts and 5 lunches per child per 5-day period).
- The sponsor must ensure food safety concerns are addressed by labeling perishable items with an expiration date. When meals are delivered, or if multiple meals are provided at one time, they should be made up of non-perishable items, or packed with ice or an ice substitute.
- Follow the [SFSP Meal Pattern](#) if using SFSP, or the [NSLP/SBP meal pattern](#) if using SSO.
- Sponsors must follow the [Vermont Food Code](#) and any additional requirements implemented by the Vermont Department of Health to limit the spread of disease.
- If collecting money for adult meals, implement cash management procedures for proper handling of the money, as well as avoiding handling of food and money by the same person without washing or disinfecting hands or using clean gloves.
- The USDA "And Justice For All" non-discrimination poster should be posted at distribution points. Additional posters may be requested from Vermont Child Nutrition Programs. Lack of a poster should not prevent sponsors from operating a site.
- All other requirements for the SFSP and SSO will remain in effect. Please review the [Administration Guide for the Summer Food Service Program](#) and the [Comparison of Programs SFSP/NSLP/Seamless Option](#) for more information.

Logistics of Drive Through Grab-and-Go Non-Congregate Feeding

For many Vermont schools, setting up the grab-and-go meal pick up as a drive through pick up site may make the most sense. Here are some tips for setting this up successfully:

- Carefully choose the location of the pickup site to accommodate vehicles and ensure social distancing. Bus drop off areas are often the best location on the school campus.
- Set up the site so that recipients can take the meals without leaving their vehicles.
- Include clear signage that directs vehicles where to go and tells recipients what to expect
- Operate the site at set hours, as described in your site application.
- Do not have recipients sign in with a shared pen. Instead, have a staff member sign people in if names need to be collected (closed-enrolled site) or numbers of children need to be counted (area eligible site).
- Unless it is possible to provide a 6' distance between staff and recipients, provide workers who will be handing meals to recipients with Personal Protective Equipment (PPE) if available and training on how to avoid exposing themselves or others.

- Local fire departments or other groups may be available to help with directing traffic or staffing distribution sites. Reach out to your local organizations first. If you need additional help, call 1-800-347-0488 and describe the resource need.

Logistics of Walk In Grab-and-Go Non-Congregate Feeding

For some Vermont schools, it may make more sense to have children pick up meals at a walk-up location. Here are some tips for setting this up successfully:

- Carefully choose the distribution location. This may be in the cafeteria, school lobby, or even outside. Avoid locations that will be difficult to find or require people to wait close together in enclosed spaces.
- Post clear signage, including where to park, where to pick up the meals, and any special social distancing measures that you are asking people to take.
- Set up the site to require as little personal interaction as possible, maximize space between staff and recipients (aim for at least 6'), and reduce the number of items that multiple people will touch.
- If it is not possible to keep a 6' distance between staff and recipients, provide staff who will be handing meals to recipients with Personal Protective Equipment (PPE) if available and training on how to avoid exposing themselves or others.
- Try to have family groups in line keep 6' buffer from each other. Tape lines on floor to show 6' distance.
- Make sure alcohol-based hand sanitizer is available for customers to use, especially if there is no soap and water
- Be sure to clean and sanitize any objects or surfaces customers may touch, including restroom surfaces, menus, condiments, etc.
- Regularly [sanitize](#) door handles and other high touch areas.
- Do not have recipients sign in with a shared pen. Instead, have a staff member sign people in if names need to be collected (closed-enrolled site) or numbers of children need to be counted (area eligible site).
- Operate the site at set hours, as described in your site application.
- Local fire departments or other groups may be available to help with directing traffic or staffing distribution sites. Reach out to your local organizations first. If you need additional help, call 1-800-347-0488 and describe the resource need.

Logistics of Home Delivery

Some schools have asked whether they may deliver meals to students directly, either using bus routes or volunteers. This is not a method that USDA has provided any guidance on at this point, however the Agency of Education believes it is allowable. If this guidance changes, we will provide an update immediately. Here are some tips to consider:

- The school could offer home delivery upon request. This could be in conjunction with a Grab-and-Go site, or as the only method of distribution. Provide a number or email

address that parents and children may call to request a delivery. Record the number of children that meals are provided for. If the school is not area eligible, record the names of the students to whom meals were provided.

- The school could use school bus routes to distribute meals at set bus stops. Record the number of children that meals are provided for. If the school is not area eligible, record the names of the students to whom meals were provided. Notify families of the time they should expect the bus at their stop.
- If it is not possible to keep a 6' distance between delivery personnel and recipients, provide delivery personnel who will be providing meals to recipients with Personal Protective Equipment (PPE) if available and training on how to avoid exposing themselves or others.
- If offering perishable items, use hot boxes or coolers to keep hot foods hot and cold foods cold. Regularly take temperatures to ensure foods are maintained at the correct temperature.
- Volunteers or community resources might be used to provide home delivery services. Record any volunteer hours worked and volunteer miles driven for possible later federal or state funding claims.
- To ensure that meals are consumed by children, when meals are delivered, they should include a notice that the meals are intended for consumption only by children age 18 and under. This notice should also include the full [USDA non-discrimination statement](#).

Adult meals and other meals outside of federal child nutrition programs

If you are unable or do not want to follow the requirements of the federal child nutrition programs, your school meals program may still sell meals and consider it “catering.” Each school food authority should have an adult meal rate set already. You can charge that rate for the meal, as long as it fully covers the cost to produce that meal. You can either charge individuals for the meal, or you can see if a community organization or other source of funds is available to pay for the meals. Non-profit school food service account funds may not be used to cover the cost of the adult meals. If you are offering meals to students through one of the child nutrition programs above, you may also decide to make meals available to parents and other adults at the same time by charging the adult meal rate for these meals. You should keep a tally of adult meals sold for later record-keeping.