

# Questions and Answers on Regulatory and Operational Guidance for Reopening School Meal Service in Fall 2020

Pursuant to the Families First Coronavirus Response Act (FFCRA), and based on the exceptional circumstances of the current COVID-19 public health emergency, the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) granted five nationwide waivers to help minimize potential exposure to the novel coronavirus, and ensure access to school meals during school year (SY) 2020-21. These flexibilities were announced on June 25, 2020.

Currently, the Connecticut State Department of Education (CSDE) is awaiting further guidance and clarification from the USDA on implementing the SY 2020-21 nationwide waivers, including guidance on providing meal service after August 31, 2020, and up until the beginning of SY 2020-21. In the meantime, the CSDE is issuing the questions and answers below to help school nutrition directors and staff prepare for meal service that maintains social distancing as schools reopen during the COVID-19 pandemic. This information may be subject to change based on the USDA's release of additional guidance, policies, and nationwide waivers; laws created by the Connecticut General Assembly; Executive Orders issued by Governor Lamont; guidance from the Centers for Disease Control and Prevention (CDC); or changes to public health data. The CSDE will continue to update this document and reissue as necessary.

The CSDE understands that it is not easy to change meal service operations and implement new policies to comply with new health and safety standards, and existing program integrity regulations. The CSDE will continue to provide support as schools work through these challenges to ensure that Connecticut students have access to high quality, nutritious school meals the upcoming school year.



## 1. What are the USDA nationwide waivers for SY 2020-21?

On June 25, 2020, the USDA announced five nationwide waivers for school year (SY) 2020-21, including four extensions and one new waiver.

- **Non-congregate feeding (extension):** COVID-19 Child Nutrition Response #33: [Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs – Extension 2](#)
- **Meal service time (extension):** COVID-19 Child Nutrition Response #34: [Nationwide Waiver to Allow Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program – Extension 2](#)
- **Parent/guardian pickup (extension):** COVID-19 Child Nutrition Response #35: [Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children – Extension 2](#)

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- **Meal pattern flexibility (extension):** COVID-19 Child Nutrition Response #36: [Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs – Extension 4](#)
- **Offer versus serve (new):** COVID-19 Child Nutrition Response #36: [Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in the National School Lunch Program for School Year 2020-2021](#)

These waivers remain in effect through **June 30, 2021**.

**2. Will all meals continue be served at no charge and claimed at the free rate during SY 2020-21?**

No. Starting on the first day of the academic school year, all school meals must be served and claimed through the National School Lunch Program (NSLP) and School Breakfast Program (SBP). SBP and NSLP sponsors must have a local meal charge policy in place. Meals must be served and claimed based on individual student eligibility (free, reduced, and paid), with the exception of schools participating in the Community Eligibility Provision (CEP). The nationwide non-congregate meal service waiver (see question 1) indicates a return to the NSLP and SBP during SY 2020-21.

**3. If the school district does not begin the academic year until after August 31, 2020, can current sponsors still provide meals through SFSP and SSO?**

The CSDE is awaiting further guidance from USDA on meal service after August 31, 2020, and up until the academic SY 2020-21 begins. The flexibilities created by the nationwide waivers were originally aligned with the time period when most school districts begin the academic school year. However, due to COVID-19, many school districts have delayed the start date of SY 2020-21. Therefore, USDA has indicated that additional guidance in this area is forthcoming.

**4. What is the status of the SSO and SFSP for SY 2020-21?**

During SY 2020-21, only meals served during **unanticipated** school closures may be claimed under the SSO or SFSP. The non-congregate meal service nationwide waiver (see question 1) indicates that planned full or partial building closures are **not** considered unanticipated school closures. Therefore, meals served to students while school is in session during SY 2020-21 (either full in-person learning, full remote learning, or a hybrid model) cannot be claimed through the SSO or SFSP.

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**5. What meal service models can be used during SY 2020-21 to address the health and safety concerns created by COVID-19?**

The following are examples of meal service model options that may work for schools: meals in the classroom (recommended by the Centers for Disease Control and Prevention (CDC)); socially distant cafeterias; and alternative meal consumption locations such as hallways or outside (weather permitting). For additional guidance, refer to the CSDE's [COVID-19 Resources for Families and Educators 2020-2021 School Year Guidance](#).

**6. How will schools adhere to meal service times for SY 2020-21?**

The USDA regulations for the NSLP (7 CFR 210.10(l)) and SBP (7 CFR 220.8(l)), state that Child Nutrition Program meals must follow meal service time requirements. To support safer access to nutritious meals, the USDA waived this requirement nationwide for the duration of SY 2020-21 (see question 1). This allows flexibility for meals served in school and to remote learners.

Connecticut General Statutes (C.G.S.) [Section 10-221o](#) mandates that each local and regional board of education requires each school under its jurisdiction to offer all full-day students a daily lunch period of not less than 20 minutes. For additional guidance, refer to [CSDE Circular Letter C-9: Federal and State Requirements for Provision and Timeframe of Daily Lunch Period for Students](#) and [CSDE Operational Memorandum No. 10-19: Requirements for Lunch Periods in the NSLP](#).

**7. Can districts/schools choose to provide lunches for take home (i.e., grab and go) on scheduled half-days?**

Yes. If it is a scheduled half-day districts/schools have the option of either serving lunches at school or allowing students to take home lunches.

Note: The CSDE strongly encourages LEAs to offer lunch to students on half-days and early dismissal days. Providing lunch to students on half-days and early dismissal days ensures that students have access to a healthy mid-day meal. This is especially critical for low-income students, who may not have access to a complete healthy meal in the evening. Serving reimbursable lunches on these days also generates additional revenue for the school nutrition program.

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## Meal Service Operations for Remote Learners

### 8. Will non-congregate meal service continue for SY 2020-21?

Yes. The USDA waived congregate meal requirements to ensure appropriate safety measures for providing meals during SY 2020-21. However, effective with the beginning of the SY 2020-21 academic year, meals will be served and claimed through the NSLP and SBP during planned full in-person, partial in-person, or full building closures in response to COVID-19.

### 9. Are sponsors required to request approval to provide non-congregate meals?

Yes. Sponsors must submit the appropriate waiver request documentation to the CSDE. The CSDE will issue additional guidance and information for sponsors on this process prior to the start of SY 2020-21.

### 10. Can sponsors claim reimbursement for meals distributed to remote learners?

To distribute and claim meals for remote learners, either for one day or for multiple days' worth of meals at a time, the sponsor must submit and receive authorization from the CSDE for the following two waiver applications: 1) non-congregate feeding; and 2) meal service time (see question 1). The CSDE will issue additional guidance and information for sponsors on the waiver application process prior to the start of SY 2020-21.

### 11. Are parents and guardians allowed to pick up meals for all enrolled children in the household during SY 2020-21?

Yes. The USDA's nationwide waiver (see question 1) allows authorized sponsors serving non-congregate meals during COVID-19-related operations to distribute meals to a parent or guardian to take home to their children who are participating in the district's remote learning program. **Meals served through SBP and NSLP may be provided only for students in the household who are currently enrolled in the school district.** These meals must be tracked accordingly. For guidance on meal counting and claiming, visit the CSDE's [Meal Counting and Claiming for School Nutrition Programs](#) webpage.

Sponsors must maintain program accountability and integrity when allowing parent/guardian pickup. This includes implementing processes to ensure that meals are distributed only to parents or guardians of eligible children who are enrolled in the school district, and duplicate meals are not distributed to any child.

Sponsors must submit a waiver application to the CSDE to allow parents and/or guardians to pick-up meals on behalf of remote learners enrolled in the school district. The CSDE will issue additional guidance and information for sponsors on the waiver process prior to the start of SY 2020-21.

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**12. If a full remote learning plan is in place at any point during SY 2020-21, can meals be claimed through SSO or SFSP as an unanticipated school closure?**

No. The SSO and SFSP can operate only during the summer months when school is not in session or during unanticipated school closures. Pursuant to the non-congregate nationwide waiver issued on June 25, 2020, all planned full or partial school closures are not considered to be unanticipated school closures for SY 2020-21. Full and partially remote learning plans have been developed by each school district ahead of the school year. Therefore, regardless of the potential for the Governor to mandate a statewide school closure due to a resurgence in COVID-19 during SY 2020-21, meals will continue to be served and claimed through the SBP and NSLP.

**13. Can sponsors allow neighbors or others to pick-up meals on behalf of remote learners that they are not the parent/guardian of during SY 2020-21?**

No. The USDA waiver allowing parents and/or guardians to pick-up meals on behalf of the children in their household does not extend beyond parents and/or guardians.

**14. Will grab-and-go meal sites be “open sites” allowing any student from any school district to receive a meal?**

No. The concept of “open sites” exists only under the SSO and SFSP, and Connecticut’s area eligibility waiver expires on August 31, 2020. All meals served, whether to in-school or remote learners (e.g., grab-and-go, curbside pickup, and home delivery) during SY 2020-21 must be served only to students currently enrolled in the district and claimed appropriately.

**15. Does every school need a grab-and-go meal service operation for all remote learners?**

All children enrolled in schools that participate in SBP and/or NSLP must be offered school meals. Sponsors must have a system in place to ensure that meals for remote learners are counted and claimed accurately through the appropriate NSLP school (site) claim in the CSDE’s Online Application and Claiming System for Child Nutrition Programs (CNP System). Sponsors must claim meals for students at the school where the student is currently enrolled, even if that is not where the meals are distributed. Meals must be offered to all enrolled children regardless of their eligibility for free, reduced-price, or paid meals.

School districts may choose to operate a grab-and-go meal service at every school. Alternatively, districts may centralize grab-and-go meal service to a select number of school sites within a district or at community sites, such as a community center or library. If alternate non-school locations are being used to distribute meals to remote learners, districts should contact their local health department to determine if there are any additional food safety requirements. Districts are also strongly encouraged to work with their administration regarding any additional liability issues with providing meals at non-school locations.

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Sponsors must adhere to point-of-service (POS) meal counting and claiming integrity to ensure that only the allowable number of daily meals are served to students. Meals must be claimed based on individual student eligibility (free, reduced, and paid). For guidance on meal counting and claiming, visit the CSDE's [Meal Counting and Claiming for School Nutrition Programs](#) webpage.

### **16. Can sponsors distribute meals to remote learners outside of in-building academic hours?**

Yes. Sponsors are encouraged to provide meals for remote learners during times that create as much accessibility to meals for remote learners as possible.

### **17. Will multiple grab-and-go meals be allowed to continue for SY 2020-21?**

Yes. The USDA's extension of the non-congregate and mealtime waivers (see question 1) allows for authorized sponsors to provide multiple meals to go for remote learners. Meals may be provided during the school day, or at the end of the day as the student leaves to go home. Sponsors must ensure that grab-and-go meals comply with the requirements for food safety and reimbursable meals.

- Grab-and-go meals must comply with food safety practices, state and local food safety requirements, and best practices regarding temperature control of meals.
- Depending on how multiple meals are distributed, sponsors may need to provide households with menus and directions to indicate which food items and portion sizes should be used for each meal. Sponsors should also consider including other appropriate instructions, such as food preparation and food safety instructions, especially the appropriate temperatures for safely reheating foods.
- Students should not eat grab-and-go meals on the bus. Sponsors should work with their school administration to ensure this message is communicated to students, families, and staff.

### **18. What is the maximum number of daily/weekly meals allowed through NSLP/SBP for SY 2020-21?**

For the NSLP, sponsors may serve up to three approved meals/snack each day (breakfast, lunch, and/or snack). The maximum number of days per week must correlate with the number of school days that schools are in session (full in-person learning, full remote learning, or a hybrid model) per week. Sponsors cannot serve and claim meals for days when schools are not regularly in session, such as weekends and holidays. As a reminder, in order for schools to claim and receive federal reimbursement for snacks served in the ASP, the sponsor's participation must be approved by the CSDE. For more information on the ASP, visit the CSDE's [Afterschool Snack Program](#) webpage.

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### **19. Can sponsors provide snacks to remote learners through the Afterschool Snack Program (ASP) of the NSLP, or meals and snacks through the CACFP At-Risk Afterschool Meals Program?**

Yes. The nationwide non-congregate waiver (see question 1) pertains to the ASP and CACFP at-risk afterschool meals and snacks. Sponsors can provide snacks to in-person learners. However, the USDA's, Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs (March 20, 2020) was **not** extended through SY 2020-21. Therefore, all snacks and CACFP At-Risk Afterschool Meals must be served in an eligible, structured, and supervised environment with an educational or enrichment purpose. The CSDE is awaiting further guidance from the USDA on how to provide snacks and CACFP At-Risk Afterschool Meals to remote learners for this purpose.

### **Additional Meal Service Considerations**

### **20. Will there be any meal pattern flexibilities for SY 2020-21?**

Yes. The USDA issued a nationwide waiver (see question 1), suspending the regulatory requirements of the NSLP (7 CFR 210.10(b) and (c)) and SBP (7 CFR 220.8(b) and (c)), which state that NSLP and SBP meals must meet meal pattern requirements. Sponsors must submit a waiver application to the CSDE and the request must be approved by the CSDE prior to implementation. Requests should be targeted and justified based on plans to support access to nutritious meals while minimizing potential exposures to COVID-19. The CSDE will issue additional guidance and information for sponsors on the waiver application process prior to the start of SY 2020-21. The USDA strongly encourages sponsors, to the extent possible, to maintain and meet the meal patterns for each program.

### **21. May we provide shelf-stable meals?**

Yes. Sponsors may serve shelf-stable meals that meet the meal pattern requirements.

### **22. Are sponsors required to accommodate documented special dietary needs?**

Yes. Federal regulations require all sponsors of Child Nutrition Programs to make substitutions to the standard meal requirements for participants whose disability restricts their diet. For specific guidance on the requirements for meal modifications in the school nutrition programs, refer to the CSDE's guide, *Accommodating Special Diets in School Nutrition Programs*, and visit the CSDE's [Special Diets in School Nutrition Programs](#) webpage.



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### **23. How will offer versus serve (OVS) be implemented?**

Under the Richard B. Russell National School Lunch Act at 42 USC 1758(a)(3) and the NSLP regulations (7 CFR 210.10(e)), OVS must be implemented in high schools. However, to support safe access to nutritious meals during the COVID-19 public health emergency, the USDA's nationwide OVS waiver suspends the OVS requirement for SY 2020-21 (see question 1). This waiver enables high schools to offer students complete meals for in-school, delivery, or for pickup meal services. Sponsors must submit a waiver application to the CSDE. The CSDE will issue additional guidance and information for sponsors on the waiver process prior to the start of SY 2020-21.

### **24. Is an “And Justice for All” poster required in each classroom where meals are being consumed?**

The poster must be visible to all students for at least one offered meal. Usually, this means that if the school offers breakfast in the classroom, and serves lunch in a centralized location, the poster is required only in the centralized location (cafeteria), as long as the same students have access to both lunch and breakfast.

If all students pick up meals from the cafeteria and bring them back to the classroom for consumption, the poster is required only in the cafeteria where meals are picked up. For SY 2020-21, if all meals are brought to the classroom, and it is not feasible to install a poster in each classroom due to the exceptional circumstances of this public health emergency, then a poster should be placed in all entryways of the site, visible to all persons who enter the building. A poster must be visible for remote learners and/or parents/guardians picking up grab-and-go meals.



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For more information, visit the CSDE's [Operation of Child Nutrition Programs during Coronavirus \(COVID-19\) Outbreaks](#) webpage, or contact the [school nutrition programs staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at [https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/QA\\_Meal\\_Service\\_Reopening\\_SNP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/COVID-19/QA_Meal_Service_Reopening_SNP.pdf).

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