

Disaster Feeding Guidance for School Food Authorities Using USDA Foods

The Connecticut State Department of Education (CSDE) administers the Food Distribution Program (FDP), which coordinates the distribution of U.S. Department of Agriculture (USDA) Foods to Connecticut schools and institutions. This document helps school food authorities (SFAs) understand the steps to take before, during and after a disaster response situation, and how to successfully assist with disaster feeding response operations using USDA Foods.



Before the Disaster

Before disasters occur, food service directors (FSDs) can take steps to ensure they are included in their community's disaster response team and are briefed on their role if the SFA is needed as a congregate feeding site. The strategies below help FSDs prepare for disaster response.

- Create an emergency/disaster contact list with important names and home and cell contact numbers. This should include:
 - FSD's immediate supervisor, e.g., business manager, principal or superintendent;
 - Connecticut FDP staff;
 - county/city emergency assistance coordinator; and
 - local disaster feeding coordinator.
- Contact your local [Community Emergency Response Team \(CERT\)](#) and request that the FSD or designee participates in any planning meetings or calls.
- Work with the CERT to identify any sources of USDA Foods in the community, including school meals, the Child and Adult Care Food Program (CACFP) and The Emergency Food Assistance Program (TEFAP).
- Create an agreement to outline how the SFA would be involved in any disaster feeding operations.
- Share any information or plans with the Connecticut FDP, as they will be needed to support any disaster response at the local level.
- Make a presentation to the CERT in your community that details how the school food service department can assist with congregate feeding.

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When a Disaster Hits

Notification to assist with disaster feeding

FSDs may be notified by the Connecticut FDP or the local disaster feeding organization that their school has been selected as a congregate feeding site for disaster response. While the disaster response plan may designate a school as an approved response site, it is not always possible to know ahead of time exactly where disaster feeding will be needed most.

The use of USDA Foods for congregate disaster feeding does not require USDA approval if USDA Foods originate from the state where the disaster occurred. **The FSD must notify the Connecticut FDP as soon as possible about any disaster feeding activity at their site.** If an emergency occurs on the weekend, the FSD should contact the Connecticut FDP as soon as possible on the next business day.

Role of disaster organizations in school kitchens

FSDs should do everything possible to assist the Red Cross or other emergency feeding organizations to provide congregate meals to disaster survivors, and make USDA Foods available for feeding activities. If using a school kitchen or a central kitchen will help the Red Cross to provide congregate meals to affected survivors, FSDs should provide use of that facility. A SFA may also help coordinate their food service staff to volunteer, since they are familiar with the kitchen facility and equipment operation.

A school building does not have to be a designated disaster shelter for emergency feeding organizations to request its kitchen facilities to prepare congregate meals. The Red Cross has successfully worked with local school food service personnel to prepare disaster meals even when the meals were served elsewhere.

SFAs should never give the Red Cross or other disaster organizations authority to take USDA Foods out of the schools on their own. Only the SFA has authority to distribute and use USDA Foods from their inventory. Additionally, FSDs should request identification or other documentation to ensure that any individuals requesting USDA Foods are legitimate emergency feeding organization workers.

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Additional food requests for disaster situations

In addition to the USDA Foods inventory provided by SFAs, disaster organizations may request food assistance from the Connecticut FDP. The Connecticut FDP will notify the USDA Regional Office of the types and quantities of food needed for emergency response. The Connecticut FDP will contact SFAs in the affected areas to provide additional guidance about the process for handling any additional inventory.

In the case of emergency response, SFAs should provide disaster feeding organizations access to all USDA Foods available including school meals, the CACFP and TEFAP. SFAs should work with the Connecticut FDP to help the Red Cross access any available USDA Foods.

Person “in charge” of the kitchen in a disaster response

When disaster strikes, the timeliness of feeding survivors is crucial. FSDs or designees should work cooperatively and professionally with the Red Cross or other disaster organizations to provide food and assistance as needed. The question of who is ultimately in charge of managing kitchen operations depends on the state’s agreement with the Red Cross or the designated emergency feeding agency.

The Red Cross is responsible for providing congregate meals in disaster situations and is permitted to use USDA Foods. SFAs are expected to assist the Red Cross or other emergency response organizations, but there are no defined guidelines for who will have full kitchen responsibility in this situation. It is up to the FSD to make this determination.

The FSD can provide the Red Cross with full management authority over emergency kitchen operations or choose to share management responsibilities since the operation is being conducted in their kitchen. The senior on-site Red Cross official and the local FSD would have equal status and should come to an agreement about kitchen management responsibilities that allows them to work cooperatively to ensure effective management of the kitchen and use of USDA Foods.

Disaster feeding menu planning

Traditionally, the Red Cross will create menus, submit requests for specific foods, and track meals served and USDA Foods usage. It may be helpful for SFAs to be involved in the menu planning process and share their breakfast and lunch menus, since the available on-site inventory will likely support these menus. The FSD or designee is ultimately responsible for ensuring that USDA Foods usage and congregate feeding records are maintained appropriately, as the FSD will be responsible for submitting these documents after the disaster.

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Using USDA further processed end-products in disaster feeding

SFAs can use USDA Foods further processed end-products in disaster feeding, but only the portion of USDA Foods in the finished end-product is eligible for reimbursement. The remaining cost of the processed product may be reimbursed by the local Office of Emergency Management (OEM). Like other products used, SFAs should closely track the further processed end-products used in disaster feeding, to submit appropriate documentation for reimbursement.

Disaster recordkeeping in “single inventory” management systems

Special documentation is required when a school recipient agency (RA) that practices “single inventory” management (commingling of purchased and USDA Foods) uses foods for disaster feeding, and requests USDA Foods replacement. The SFA should assist the Connecticut FDP with the necessary documentation. The Connecticut FDP must document that either:

- the foods used for the disaster were USDA Foods; or
- the SFA received the same types of USDA Foods as those foods used in the disaster feeding during the year preceding the onset of the disaster feeding.

Disaster meal counting and claiming

The USDA FDP regulations require that disaster organizations distribute USDA Foods only to recipients who are eligible to receive them. However, if RAs serve meals containing USDA Foods to persons other than those who are eligible, the number of these individuals must be less than the number of eligible individuals. For example, volunteers and servers may eat prepared meals if they do not outnumber the disaster survivors. Any volunteer meals served should be included in the total meal count.

USDA Foods disaster recordkeeping

Recordkeeping is a standard practice for SFAs, including production, service and inventory records. It is important to keep a separate record of the USDA Foods used in a disaster response to ensure that replacement or entitlement reimbursement can occur, if federal funding is available. USDA Foods will need the following information to process a reimbursement request:

- description of the disaster situation;
- number of people affected;
- period of time for congregate feeding;
- quantity and types of food used; and
- number and location of feeding sites.

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Disaster meal clean up responsibilities

Typically, the organization operating the feeding facilities would be responsible for clean up after service. However, another agency or organization could be responsible for maintenance of disaster shelters and feeding sites if there is a written disaster response agreement. It may be helpful for SFAs to work with their CERT to better understand the plan and the SFAs responsibilities during the event.

After the Disaster

Replacement of commercial and USDA Foods used in a disaster response

- **USDA Foods:** SFAs should work with the Connecticut FDP to submit appropriate documentation of the disaster response service and USDA Foods usage. The Connecticut FDP or USDA Regional Office is required to submit a [FNS-292A](#) form online to request USDA Foods product replacement or reimbursement within 45 days after the end of the disaster assistance, or later if justification exists to waive the 45-day requirement. If the disaster has a “Presidential Disaster Declaration,” the USDA can replace product or reimburse the value of the USDA Foods. If the disaster, emergency, or situation of distress does not have a Presidential declaration, the USDA will attempt to reimburse the Connecticut FDP for the value of the USDA Foods used, if funds are available. The Connecticut FDP is responsible for transferring the disaster reimbursement to the SFA USDA Foods account or replacing the product. Reimbursement for USDA Foods is guaranteed for Presidentially declared disasters and emergencies, but is not guaranteed for situations of distress, disasters or emergencies that do not have a Presidential declaration.
- **CASH or CLOC schools:** If the SFA receives USDA assistance in the form of Cash in Lieu of Commodities (CASH) or Commodity Letter of Credit (CLOC), and participated in state authorized disaster congregate feeding, the SFA will be required to provide the Connecticut FDP with purchasing receipts/invoices for the food used for disaster feeding. This is similar to the current program requirements for participation in CASH or CLOC.
- **Bulk USDA Foods for further processing:** If the SFA decides to use products that contain bulk USDA Foods, only the portion of USDA Foods in the finished end-product is eligible for USDA reimbursement. Documentation of the total bulk USDA Foods used for finished end-products is provided in the National Processors Summary End Product Data Schedule, available from the Connecticut FDP. The remaining cost of the processed product can possibly be claimed for reimbursement by submitting a request to the local OEM who works directly with the FEMA and can submit a claim on behalf of the SFA.

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- **Non-USDA Foods:** For Presidentially declared emergencies or disasters, SFAs can apply for reimbursement of the value of foods by submitting a request to their local OEM. The local OEM works directly with the FEMA and can submit a reimbursement claim on the SFAs behalf. In some situations of distress, the SFA may be able to set up a per-meal-rate for the Red Cross, subtracting out the value of the USDA Foods.

Disaster nonfood supply reimbursement

The FEMA should reimburse 75 percent of the cost of nonfood supplies used in a Presidentially Declared Disaster. Otherwise, reimbursement is expected to come from the state. If any shopping is required for supplies such as paper products and utensils, the Red Cross normally brings or orders them to a disaster site or will place a request order through the FEMA to bulk purchase supplies. The Red Cross or the FEMA might ask the state or SFA if they have such supplies available for use. Reimbursement for these supplies would come from the Red Cross or the FEMA.

Compensation for SFA overtime in a disaster response

If the disaster has a Presidential declaration, the FEMA will pay 75 percent of the directly related disaster overtime and the state must cover the other 25 percent. In disaster situations without a Presidential declaration, reimbursement should be sought from the state. If the SFA's employees are not working on a voluntary basis, labor hours and wages directly related to the disaster response must be recorded to submit for reimbursement to the local OEM. The local OEM can file a claim for payment of hours worked to the FEMA. The remaining portion should be submitted to the Connecticut FDP.

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Resources

Disaster Feeding Guidance (CSDE's Food Distribution Program (USDA Foods) webpage):

<https://portal.ct.gov/SDE/Nutrition/Food-Distribution-Program-USDA-Foods/Documents#DisasterFeedingGuidance>

Fact Sheet: USDA Foods During Disaster (USDA):

<https://www.fns.usda.gov/disaster/usda-foods-during-disaster>

USDA Foods Program Disaster Manual (USDA):

<https://www.fns.usda.gov/usda-foods/program-disaster-manual>

Webinar: Use of USDA Foods in Disasters (USDA):

<https://www.fns.usda.gov/usda-foods/use-usda-foods-disasters>

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For information on the Connecticut Food Distribution Program (FDP), visit the CSDE's [Food Distribution Program \(USDA Foods\)](#) webpage or contact the [FDP program staff](#) at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/FDP/Disaster_Feeding_Guidance_SFAs_Using_USDA_Foods.pdf.

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1. mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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