COVID-19 Guidance for School Nutrition Program Operations

Purpose
Vermont schools have requested specific guidance for school meals programs during the COVID-19 outbreak. The below guidance is a compilation of best practices. Each school is unique, and not all suggestions will make sense in each situation. Use common sense when determining which measures to take for your school(s). The below is intended to be a starting point, and will be updated with additional best practices. The memo discusses options for feeding students when school is in session, when instruction is still occurring by the building is closed, and when school is closed. The Vermont Department of Health has also released COVID-19 Guidance for Food and Lodging Businesses, which you may find helpful. Please contact the Vermont Child Nutrition Programs to discuss unique situations.

When School Is In Session
When schools are in session, school food authorities should continue to operate the school meals programs. However, these programs can take the following additional steps.

Families Facing Economic Hardship
Schools should remind households that if they are facing economic hardship as a result of COVID-19 that they can submit a new free and reduced meal application. Families may apply for school meals at any point in the school year, based on their most current income.

Best Practices for Safe Meal Service
Schools can consider taking the following steps to reduce the risk of transmission during meal service.

- Congregate feeding is not a requirement for the National School Lunch Program and School Breakfast Program, so schools may consider offering an alternative meal service such as grab-and-go unitized meals, or meals in the classroom.
  - If the school currently offers “offer vs. serve” meal service, they should amend their online site application with the state to indicate that they are offering “serve” instead, if unitized meals will be provided. If site applications are modified, they must be resubmitted and approved by Child Nutrition Programs.
  - Milk choice is still a requirement when meals are unitized.
- Alter self-service deli stations and salad bars to have food service staff build sandwiches and salads instead of students.
- Consider ways that salad bars and fruit/veggie bars can be altered:
  - Pre-portion items on the salad bar;

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Use commercial pre-packaged fruits and vegetables such as fruit cups, bagged carrots, and individually portioned dried cranberries and raisins.

- Use single-use squares of parchment paper instead of tongs for serving pizza or other self-serve items.
- Pre-portion condiments to replace bulk condiment dispensers.
- Add a barrier for individual fresh fruit with edible peels (i.e. apples, pears), such as a portion cup, cellophane or baggie. Fruit with inedible peels (i.e. oranges and bananas) do not need to be wrapped.

Please note that none of these steps are required, and schools should use common sense in identifying the steps that are the best fit for their unique situation.

**Food Service Sanitation**

Schools can consider taking the following steps to reduce the risk of transmission.

Increase the frequency of sanitization of the following items:

- Student pin pads
- Student ID cards used for lunch counting, if students hand them in
- Self-service tongs and utensils
- Lunch tables
- Counter tops
- Bulk condiment dispensers

- Have a staff member enter student pin codes on behalf of students, rather than having students enter their own codes.
- If students are not currently given an opportunity to wash hands before and after meals, consider adding handwashing time into the schedule.
- Place hand sanitizer dispensers in the cafeteria.
- All normal food safety required practices in the Vermont Food Code should continue to be followed. Now is a good time to do a self-audit to ensure that these practices are being followed. Key areas to check include:
  - Correct dishwasher temperatures for sanitization
  - Employee handwashing
  - Cleaning and sanitizing surfaces
  - Procedures for employees to calling in sick or doing non-food related duties when sick
  - Utensil distribution
  - Tongs in fruit bowls and other self-service areas

**Employee Health & Substitute Coverage**

Ensure that school food service staff understand that they should call in sick if they are feeling ill and make a plan to provide staff coverage if employees call-in sick so that no employee feels pressure to come to work when sick. This plan could involve pulling food service employees from other schools within the Supervisory Union/School District, or even working together with
nearby Supervisory Unions. If many employees are ill, the Supervisory Union/School District could consider consolidation food service production in one centralized kitchen and then transporting the meals to schools. Follow proper food safety practices for keeping hot foods hot and cold foods cold when transporting meals.

Consider whether employees have paid sick leave available. Telework is unlikely to be an option for most food service staff, however some responsibilities, such as paperwork, ordering, training or menu planning could potentially be conducted via telework.

Ensure that substitutes have food safety training. Free web-based food safety training is available at any time from the Institute for Child Nutrition. Child Nutrition Programs also recommends these very basic training videos on hygiene, temperature control and sanitization from Iowa State University Cooperative Extension.

Schools using food service management companies should discuss employee sick leave plans and policies with their management company.

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

Meals can still be served and claimed through the National School Lunch Program/School Breakfast Program if instructional activities are continuing to take place.

- Follow normal counting and claiming methods (claim by student status, unless operating CEP or Provision 2).
- Grab-and-go/Sack meals are allowed.

If individual students are quarantined, but school is still in operation, schools may consider delivering meals to students at their homes or offering grab-and-go meals at drop locations. Please contact the Child Nutrition Programs for further guidance and required permissions if you intend to do this.

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

When school is not in session, the school meals programs may not operate. This includes the National School Lunch Program, School Breakfast Program, Fresh Fruit and Vegetable Grant 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 unexpected school closure. To use this option, the school food authority must have an approved SFSP or SSO program agreement and application on file with the state. Summer 2020 applications are open already, so SFAs are encouraged to preemptively begin submitting these applications.

Please contact Child Nutrition Programs for more information on implementing the SFSP or SSO. Child Nutrition Programs has some ability to approve applications in emergency situations without all of the information required for normal summer operation. Vermont has already received a waiver to allow meals to be served through the SFSP or SSO during unexpected school closures either at the school, or at another location within the community.
**Congregate Feeding Requirement**

Both the SFSP and SSO include a congregate feeding requirement. Children must receive and eat their meals in the same location and cannot take the meals off-site. State Agencies may apply to USDA for a waiver of this requirement. The Vermont Agency of Education is in the process of applying for such a waiver, but it has not yet been granted. Until the waiver is granted, non-congregate meals are not qualified for federal reimbursement.

**At-Risk After School Meals in the CACFP**

At-Risk After School Meals in the CACFP may continue to be offered during an unexpected school closure, and the meal times may be adjusted. However, this program does require that an enrichment activity take place for the program to be offered and includes a congregate feeding requirement. Schools currently participating in this program should contact Child Nutrition Programs to discuss their options.

**Use of USDA Foods**

USDA Foods may be used to produce meals for non-congregate feeding of children and adults in presidentially declared disasters or emergencies and situations of distress, with permission from USDA. Foods will be replaced or reimbursed in a presidentially declared disaster and may be replaced if funds allow in a situation of distress. If the SFA would like to use USDA Foods in this way, they should notify Child Nutrition Programs and we will request permission from USDA. The SFA should track the quantity and type of foods used, number of persons served, and number of days that foods were used. More information on using USDA Foods in an emergency situation can be found at on the USDA website.

**Donation of Unused Foods**

If prepared meals or perishable foods (milk, produce) are not able to be used by the food service program as a result of an unplanned school closure, School Food Authorities are reminded that they may donate these foods to a 501(c)3 nonprofit, or to another child nutrition program. Unused foods may not be provided directly to individuals. SFAs are encouraged to plan ahead and determine which child nutrition program or 501(c)3 non-profit could take foods that the program us unable to use as a result of an unexpected school closure.