

Child Nutrition Weekly Update

Q&A Regarding Meals Available to Students during School Closures as a Result of an H1N1 (Swine) Flu Outbreak

Schools participating in the National School Lunch and/or School Breakfast Programs may be closed following declaration of a public health emergency under section 319 of the Public Health Service Act. For children enrolled in those closed schools, reimbursable meals may be offered by schools under a modified Summer Food Service Program (SFSP) or Seamless Summer Option (SSO), as set forth in USDA Policy Memorandum SP 31-2009. The following website may be a valuable resource for Child Nutrition Administrators to keep informed about strategies used by school districts to prepare for the H1N1 (Swine) Flu Outbreak:



<http://www.flu.gov/plan/school/toolkit.html>

The questions and answers included in this week's *Child Nutrition Weekly Update* provide additional information regarding how SFAs may operate a modified SSO in order to assist economically disadvantaged children during such school closures. **The modified SSO is authorized for H1N1- related school closures only; it is not authorized for any other purpose.**

For questions concerning the operation of the SFSP, please contact Cynthia Ervin, SFSP Coordinator, with the NC Department of Health and Human Services at Cynthia.Ervin@ncmail.net as she may provide more specific requirements relative to the SFSP.

To affirm the commitment of USDA and USDE to providing meals to economically disadvantaged students during an H1N1-related school closure, please read the attached letter from Secretaries of Agriculture and Education. Many of our economically disadvantaged students rely on meals served at school as their primary source of food. Hopefully, there will be no school closures, but if schools do close due to the H1N1 flu outbreak, it is good to know there are provisions for the Child Nutrition Program to be able to provide a "safety net" for many of these children who depend upon us.

Questions & Answers

QUESTION 1: Which requirements for operating the SSO are waived for H1N1-related school closures?

Answer: State agencies may waive the requirement for meals to be served and consumed in a congregate setting to support social distancing measures necessary during these outbreaks. State Agencies may also waive any pre-operational training and monitoring requirements.

QUESTION 2: What entities are eligible to operate the SSO during H1N1-related school closures?

Answer: Any School Food Authority (SFA) eligible to operate the SSO and which enters into an agreement with the State agency to operate the SSO when schools are closed due to an H1N1 outbreak may participate. The agreement with the State agency must be amended to address specific conditions under which the SFA will operate the SSO in the event of possible school closures in the coming year. These agreements should be submitted to the State at the same time waiver requests are submitted. (see #3 below)



QUESTION 3: How does an SFA or community organization initiate participation in the SSO H1N1 program?

Answer: The SFA must submit an amended Agreement to the State Agency (SA) prior to operating the flexible SSO. Please see #7 for information on what information should be included in the waiver request. In order to assure a prompt response to school closings, SFAs are encouraged to prepare and submit and Agreement amendment to the State Agency and to enroll their schools in the SSO Component of the Child Nutrition Technology System.

QUESTION 4: Who is eligible to receive meals under the flexible SSO?

Answer: Eligible children are all children age 18 and under in a household where, at least, one child in the household is enrolled in the closed school.

QUESTION 5: How will SSO site eligibility requirements apply to H1N1 meal service? Must all schools served be in low-income areas?

Answer: The primary goal of meal service offered during the H1N1-related school closure is to address the loss of school meals for the low-income children enrolled in the closed schools. In general, SSO site eligibility requirements apply, with modifications to address the unique circumstances of these school closings. In the case of a school closure, the determination of site eligibility is based not on the location of the site, but rather on the closed school's population. For closed schools with 50 percent or more of their enrolled students certified eligible for free or reduced price meals, SFAs may develop meal distribution methods in which meals are available to all families with children enrolled in that school, with a focus on serving low-income children. For closed schools with less than 50 percent free or reduced price enrollment, meal distribution must more directly target the households of enrolled children who are eligible for free or reduced-price meals. Schools should use current free/reduced price certification information or, if necessary depending on the timing of the school closures, immediate prior year eligibility certifications to determine the percentage of students enrolled in the school that are eligible for free/reduced price meals.

QUESTION 6: What distribution methods are envisioned for H1N1 meal service, and what logistical issues must be considered?

Answer: Meal distribution methods will be determined by the SFA and approved by the SA; approved distribution methods will include pick-up or delivery models in order to meet the need for social distancing during an H1N1 outbreak. Distribution methods should focus on targeting a closed school's low-income children. The logistical issues are numerous and further support the need for Child Nutrition Administrators to begin coordinating with School Administrators immediately.

QUESTION 7: What details of SSO operation must be included in the Agreement amendment? (Note: a Sample Agreement amendment will be provided in next week's *Child Nutrition Weekly Update*.)

Answer: The Agreement amendment must define how the SFA will operate the SSO during an H1N1-related closure. At a minimum, the Agreement amendment will include:

- Name of school(s) covered by waiver request
- At what point after the declaration of public health emergency and school closure would the meal service start;
- What meal distribution method(s) the institution will use and how the program will be operated to target the children in the closed schools;
- How the meal distribution will target low-income children (note meal service is not limited to children who are certified for free or reduced price meals);
- Methods for communicating with households; and

- How the SFA will ensure proper operation of the program including meal content, meal counts, food safety, oversight, etc;

All Agreement amendments will be subject to SA approval. Once approved, SFAs must notify the SA before they activate Agreement amendment. The Agreement amendment will receive final approval once all schools, designated by the SFA to participate in the modified SSO, are successfully enrolled in the SSO Component of the Child Nutrition Technology System. (Note: Instructions for enrolling schools in the SSO Component of the Child Nutrition Technology System will be provided in next week's *Child Nutrition Weekly Update*.)

QUESTION 8: Can meals be provided to siblings who may not be in school or who do not attend the closed school?

Answer: Yes, if a household has a child enrolled in the closed school, all children age 18 and under in that household may be served.

QUESTION 9: Can a parent/caregiver of a child enrolled in the closed school pick up meals for their children?

Answer: Yes, as long as the meal distribution site has a way to verify that the adult picking up meals has an enrolled child in the closed school, this would be permissible. This arrangement must be described in the Agreement amendment.

QUESTION 10: How many meals per child may be offered each day? Can meals be distributed for more than one day?

Answer: The maximum number of meals that may be offered remains the same as under the SSO: up to two meals or one meal and one snack, per child, per day, in any combination except lunch and supper. Under special circumstances, the State agency may approve a distribution approach that includes meals for multiple days should this option be required. The SFA must carefully consider the capacity of the school to execute such an approach effectively, including meeting all food safety requirements. Should the SFA propose a distribution plan for multiple days, the details of this plan, including the SFA's plan for ensuring the safety, must be included in the Agreement amendment.

QUESTION 11: At what rates will the meals be reimbursed?

Answer: Programs operating under the SSO will be reimbursed at the applicable free meal rate for school meal programs.

QUESTION 12: What are the requirements for the meals?

Answer: The meals must meet the regular menu planning requirements of the SSO. SFAs may find it easier to use food based menu planning and provide the maximum portion size, rather than trying to provide meals based on the various ages of the children served. 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.

QUESTION 13: When operating an H1N1 program, what types of expenses may be paid from the non-profit Child Nutrition Program account?

Answer: Schools may pay any allowable cost from the non-profit Child Nutrition Program account including any equipment or supplies that may be needed to hold and distribute meals, costs related to meal distribution, and staff wages to prepare and distribute meals. Please remember that meal reimbursements will be provided on a per meal basis. No additional Federal funds will be provided for this effort.

If you or other School Administrators have additional questions concerning the operation of the SSO during H1N1-related school closures, please submit them to Lynn Hoggard at lhoggard@dpi.state.nc.us and the section will answer your questions in future *Child Nutrition Weekly Updates*.

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