# SNP Memo #2019-2020-32

[](http://www.doe.virginia.gov/administrators/index.shtml)  
**COMMONWEALTH of VIRGINIA   
Department of Education**

DATE: March 11, 2020

TO: Directors, Supervisors, and Contact Persons Addressed

FROM: Sandra C. Curwood, PhD, RDN, ***Sand*y**

Seth Benton, Food Distribution Manager, VDACS

## SUBJECT: Coronavirus (COVID-19): Meal Options for Feeding Students

This memo outlines the options for providing student meals in the event of an unanticipated school closure due to COVID-19. Unanticipated closures prevent children from receiving educational instruction and the nutritious meals that they would normally receive.

Regulations found at 7 CFR 225.6(d)(1)(iv) provide guidance on using the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO) to feed children during unanticipated closures. The Virginia Department of Education (VDOE) applied and was approved for a statewide waiver that allows schools to serve as a SFSP or SSO site during an unanticipated closure.

### Information on Non-congregate Feeding

Additionally, VDOE applied for a waiver from USDA to approve SFSP and SSO sponsors for non-congregate feeding due to the COVID-19. In the interest of expediency, VDOE is providing the waiver form as Attachment A to this memo, in the event the waiver request to USDA is approved.

If an unanticipated school closure occurs due to COVID-19, sponsors (School Food Authorities and non-school sponsors), may use the SFSP or SSO to provide meals. The sponsor is required to submit or have a SFSP or SSO application in SNPWeb. If the sponsor is considering non-congregate feeding, a waiver must be submitted to VDOE. It is not mandatory that schools provide meals during an unanticipated closure due to COVID-19 but are encouraged to ensure the needs of children are met during extended school dismissals.

### Process for Feeding During a COVID-19 Related Closure

1. Planning for a school related closure is essential. When developing your written plan and procedures, remember to collaborate with your community partners. Considerations when developing your plan:

* Name of school(s)/site(s) covered by the waiver request;
* Following school closure when will the meal service begin;
* The meal distribution method(s) you will use to target children from the schools that are closed;
* If the school does not have 50 percent or more free or reduced-price eligible children, how will meal distribution target low-income children;
* Methods for communicating with families;
* How you will ensure proper operation of the program including the meal pattern, meal counts, food safety oversight, etc.; and
* How you will accommodate children with documented special needs.

1. Sponsors must revise their application in SNPWeb to enter all potential sites and email their assigned specialist. Sites must be entered and approved before the sponsor begins providing meals.
2. Sponsors must complete *Attachment A, Waiver for Sponsors to Provide Meals in Non-Congregate Settings*. This form details how sponsors will operate during the school closure.
3. Email your assigned specialist to let them know that your application and waiver have been submitted.
4. VDOE approval is required before serving meals.

### Important Information Related to Feeding During COVID-19 Closures

* **Targeted Audience**: The targeted children for these meals are those that attend schools that have been closed due to COVID-19. However, in eligible areas, meals may be served to all children 18 and under in the household if at least one child attends the closed school.
* **Schools Greater than 50 Percent Free or Reduced**: 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. There should be a focus on serving low-income children.
* **Less than 50 Percent Free or Reduced**: For closed schools with less than 50 percent free or reduced price enrollment, meal distribution methods must more directly target the households of enrolled children who are eligible for free or reduced-price meals. Schools should use current free and reduced-price certification information.
* **Number of Meals per Day**: The maximum number of meals that may be offered is up to two meals or one meal and one snack, per child, per day, in any combination except lunch and supper.
* **Multiple Meals:** Meals may be distributed for multiple days if approved. The sponsor must have the capacity and document the process on the waiver form. This must include meeting food safety requirements.
* **Meal Counts**: Separate meal counts and records must be maintained for meals served under a COVID-19 waiver.
* **Meal Requirements**: Meals must meet the regular menu planning requirements of the SFSP or SSO. **Offer vs. Serve will not apply and all meals must be unitized**. A complete reimbursable meal that meets all requirements of the menu planning methods must be served. Milk must be included in the unitized meal. Shelf-stable milk may be used. If milk or other meal components become unavailable, VODE will work with sponsors to approve additional flexibilities.

### Other Flexibilities that Require State Agency Approval

To best meet the needs of areas were schools are closed due to COVID-19, certain meal flexibilities in SFSP and SSO are allowed with VDOE approval. The VDOE can provide approval with regard to time of meal service. If there are emergency conditions that prevent sponsors from obtaining fluid milk, VDOE may allow service of meals without milk or with an alternate form of milk. If other changes to meal components or menu planning are needed due to limited resources, VDOE will work with the sponsors to make additional waiver requests. Based on the needs of each community, **USDA** may waive requirements that SFSP and SSO sites must serve areas in which poor economic conditions exist. Sites may be approved in areas that are otherwise not eligible.

### USDA Foods in Disasters

The use of USDA Foods in a disaster situation is allowed. Any food donated by USDA to public schools may be used in disaster feeding. Recognizing the emergency and the need to feed people, school food service management and other outlets must cooperate fully to make the USDA Foods available to groups involved in disaster feeding activities. Accurate records must be kept by the SFAs of all food provided or used for disaster feeding purposes. USDA also has a Foods Program Disaster Manual available on the [FNS website](https://www.fns.usda.gov/disaster/disaster-assistance). The website has a new reference for pandemic planning.

Additional information will be provided as it becomes available. If you have any questions, please contact the specialist assigned to your region, [SNPPolicy@doe.virginia.gov](mailto:SNPPolicy@doe.virginia.gov) , or email [Sandra.Curwood@doe.virginia.gov](mailto:Sandra.Curwood@doe.virginia.gov). If you have questions regarding USDA Foods, please contact Seth Benton at 804-786-0532.

SCC/BDB/cc

**Attachment**

1. Waiver for Sponsors to Provide Meals in Non-Congregate Settings