

# Child Nutrition Programs

**Updated information appears in Red.**

**Document Updated on April 1, 2020 at 2:19 PM**

One of Ohio's highest priorities during the ordered school-building closure period, which seeks to diminish the spread of the coronavirus (COVID-19), is to ensure that students receive nutritious meals. This is fundamental to supporting the whole child. We recognize this will be challenging, but we are already heartened and encouraged by the way in which the education community and food service operations are stepping up to meet the needs of students.

To achieve this goal, the Ohio Department of Education has developed this technical assistance document to help schools think through important child nutrition opportunities. This information will help ensure the most successful outcomes.

**Schools should file the specified applications as quickly as possible to ensure the smoothest transition to alternate food service operations during the ordered school building closure. This process will not take much time.**

## Ohio's Stay at Home Order

On March 22, 2020, a [Stay at Home Order](#) was issued by Dr. Amy Acton, director of the Ohio Department of Health. This order generally requires Ohioans to stay at home. However, certain people are exempt from the order and allowed to leave their homes or places of residence to participate in certain essential businesses and operations. Section 12(o) of the order specifies that one of these essential businesses and operations includes schools and other entities that typically provide food service to children. The order allows schools and other entities to continue to provide food services on a pickup or take away basis only, and food is not permitted to be eaten at the site at which it is provided or any other gathering site. Please note that Child and Adult Care Food Program (CACFP) sponsors are included as "other entities" and permitted to continue meal service on a pickup or take away basis.

This provision of the "Stay at Home" order also allows home and bus stop meal deliveries to continue for emergency feeding plans during the ordered school-building closure period. All educational institutions, including child nutrition program sponsors, should ensure social distancing of six feet per person is maintained to the greatest extent possible.

## U.S. Department of Agriculture (USDA) Nationwide Waivers

The USDA issued three nationwide waivers regarding child nutrition programs on March 21, 2020, effective through June 30, 2020, or upon expiration of the federally declared public health emergency, whichever is earlier.

1. [Non-congregate Feeding National Waiver](#) – This waiver allows National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program sponsors to serve non-congregate meals. **Schools that opt to serve meals during the ordered school-building closure period must complete the [Feeding Children During Coronavirus \(COVID-19\) Related Unanticipated School Closures Application](#). Child and Adult Care Food Program sponsors that are no longer allowed to provide child or adult care services during the ordered closure period but opt to serve non-congregate meals during the closure period must complete the [Child and Adult Care Food Program Feeding Children Using Non-Congregate Meal Service During Coronavirus \(COVID-19\) Related Public Health Emergency Application](#).**

**Please check back for updates to this document frequently.**

2. [Meal Times Nationwide Waiver](#) – This waiver suspends meal-time requirements and restrictions, allowing sponsors to provide multiple meals, such as breakfast and lunch, at the same time, for up to one week for the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program.
3. [After-school Activity Waiver](#) – This waiver applies to after-school snacks in the National School Lunch Program and after-school at-risk program meals and snacks in the Child and Adult Care Food Program and waives the requirement for meal service in a structured and supervised setting with an educational or enrichment activity.
4. [Meal Pattern Waiver](#) – This waiver permits the state agency to waive specific meal pattern requirements as needed to support access to nutritious meals when certain foods are not available due to the coronavirus. Sponsors experiencing difficulties providing all meal components due to a food shortage must submit a [Food Shortages During Coronavirus \(COVID-19\) Related Unanticipated School Closures Application](#).
5. [Parent and Guardian Meal Pickup Waiver](#) – This waiver allows parents and guardians to pick up meals for their children. The Ohio [Parent, Guardian or Agency Meal Pickup Without Children Present policy](#) provides additional information and guidance for sponsors to make a good faith effort to ensure food is being picked up for children.
6. [Community Eligibility Provision \(CEP\) Waiver](#) – This waiver extends Community Eligibility Provision deadlines for the 2020-2021 school year.
7. [Child Nutrition Monitoring Waivers](#) – These waivers apply to on-site monitoring requirements in the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program and Summer Food Service Program.
8. [Area Eligibility Waiver](#) – This waiver permits school food authorities in good standing to operate open sites under either the Seamless Summer Option or Summer Food Service Program. The Ohio Department of Education is developing guidance for this waiver and will publish the guidance in the immediate future.

## School or District Closure

During the ordered school-building closure period, all closed schools may continue to receive reimbursement for meals served during the closure by following the simple steps described in this document. Schools can apply to participate in the Seamless Summer Option (SSO) or the Summer Food Service Program (SFSP) to continue serving meals during the ordered school-building closure period.

### **Schools that have student enrollments of 50 percent or more free or reduced-price or that are Community Eligibility Provision (CEP) schools**

Schools with 50 percent or more free or reduced-price enrolled students participating in Community Eligibility Provision (CEP) or area eligible based on [census data](#) may offer meals to students and count and claim meals served under the Seamless Summer Option (SSO) or the Summer Food Service Program (SFSP). Reference the [Summer Food Service Program versus Seamless Summer Option comparison chart](#) for more information.

### **Schools with less than 50 percent free or reduced-price enrolled students**

Schools that do **not** have at least 50 percent free or reduced-price enrolled students must operate as a closed enrolled site under the Seamless Summer Option (SSO) or the Summer Food Service Program (SFSP). Schools operating as a closed enrolled site must maintain a roster for students receiving meals to track eligibility and aim to serve free and reduced-price enrolled students during the ordered school-building closure period.

Schools with less than 50 percent free or reduced-price enrolled students operating as a closed enrolled site are permitted to claim all meals served to free and reduced-price enrolled students, as well as the same proportion of meals served to students who normally pay full price for meals. For example, if a school served 210 breakfast meals and 100 of the meals (47.6%) were served to students categorized as free and reduced, the school may claim 100 (47.6%) meals for children ineligible for free reimbursement. The remaining 10 (4.8%) meals are not eligible for meal reimbursement.

**Note: Schools should not turn away students.** *At the present time, reimbursement requests through the normal procedures should include all meals served to free and reduced-price enrolled students and the same proportion of meals served to students that normally pay full price for meals as described in the above paragraph. Reimbursement requests should not include meals that are not eligible for meal reimbursement based on the above guidelines. We have initiated a waiver request to allow reimbursement for such meals.*

## Schools providing online instruction

Schools that still are providing instruction through alternate means (including online or other remote approaches) during the ordered school-building closure are permitted to operate and claim reimbursement under the National School Lunch Program or School Breakfast Program, as they would normally, or participate in the Seamless Summer Option or Summer Food Service Program. Schools that are completely closed and not providing instruction through alternate means — no online or other remote educational approaches — **may not** continue to participate under the National School Lunch Program and School Breakfast Program and **must** operate under the Seamless Summer Option or Summer Food Service Program.

## Child and Adult Care Food Program (CACFP) Operations

Child and Adult Care Food Program sponsors have two options: 1) If the locations in which they normally serve food are closed and food service ceases, they may shift to serving non-congregate meals; or 2) They may seek to obtain approval to operate under temporary pandemic child care center licenses and continue to serve congregate meals. These options are discussed further below.

### Closed Child and Adult Care Food Program (CACFP) sponsors opting to serve non-congregate meals

Child and Adult Care Food Program sponsors for which the locations where they normally serve food are closed but want to continue serving non-congregate meals may serve and claim under the Child and Adult Care Food Program and must serve meals in non-congregate settings. Of these programs, those operating as centers or family day care homes may feed only enrolled children; they may not serve non-enrolled children (that is, they may not operate as open sites). After-school at-risk sites may continue to operate as open sites and serve any child. For after-school at-risk sites, the on-site enrichment activity requirement is waived.

Child and Adult Care Food Program sponsors must continue to follow meal pattern requirements for reimbursable meals and maintain the required documentation.

### Child and Adult Care Food Program (CACFP) sponsors opting to serve meals while operating under temporary pandemic child care center licenses

Child and Adult Care Food Program sponsors for which the location where they normally operate continues to operate under a temporary pandemic child care license may continue to serve congregate meals under the Child and Adult Care Food Program. Be advised of the restrictions on group numbers in the pandemic child care programs. The limit is six children and one adult per room and sharing communal space is not advised. (The rule for pandemic child care programs are available [here](#).)

For the March and April 2020 claims for reimbursement, any program operating in a location with a temporary pandemic child care center license can enter the free, reduced, paid and enrolled children counts based on its center's free, reduced, paid and enrolled children counts PRIOR to the temporary pandemic child care center license period. Upon expiration of the temporary pandemic child care center license and when resuming normal operations, the program will resume its free, reduced, paid and enrollment count collection processes per Child and Adult Care Food Program requirements.

Child and Adult Care Food Program sponsors must continue to follow meal pattern requirements for reimbursable meals and maintain the required documentation. If a Child and Adult Care Food Program sponsor experiences difficulties providing all the meal components due to food shortages, the sponsor should work with the Ohio Department of Education to discuss options.

## Steps for Operating Effectively During the Ordered-School Building Closure Period

### Step 1: Request waiver to serve meals during the ordered school-building closure period

Schools that opt to serve meals during the ordered school-building closure period must complete the [Feeding Children During Coronavirus \(COVID-19\) Related Unanticipated School Closures Application](#). When completing the application, schools must provide information about participating sites, dates of closure and meal service, meal distribution methods used, methods to serve free and reduced-price students, methods for communicating meal availability with families and how schools will conduct program oversight.

Upon approval from the Ohio Department of Education, the school must choose to operate under the Seamless Summer Option or the Summer Food Service Program. Then, schools will work with their assigned education program specialist to complete the application.

### Step 2: Complete Either the Seamless Summer Option Application or the Summer Food Program Application

#### Seamless Summer Option Application

Schools that opt to serve meals through the Seamless Summer Option during the ordered school-building closure period must list the sites participating in the Seamless Summer Option in the waiver request. Upon approval, the school can complete the application in the [Claims Reimbursement and Reporting System \(CRRS\)](#) School Nutrition Program module in the 2019-2020 Application Packet.

- Once in the application packet, click **Seamless Summer Option** under **Site Applications**. Make sure to fully complete each site application.
- In the periods of operation section, document the meal service start date and anticipated date by which meal service will end. A revised application may be submitted to amend this date as needed.
- Enter the number of serving days anticipated for March and April in the top boxes and the estimated number of students served daily in the bottom boxes.
- Make sure you save each screen and check certification boxes as needed. Schools must **Save** then **Finish** the Seamless Summer Option site application then click **Submit**.

### Summer Food Service Program Application

Schools that opt to serve meals through the Summer Food Service Program during the ordered school-building closure period must complete the application in the [Claims Reimbursement and Reporting System \(CRRS\)](#). It is important to complete the application in the following order. Most of the information submitted last year has pre-populated into the fiscal year 2020 application. Be sure to save each screen and check certification boxes as needed.

1. Sponsor Application
2. Management Plan
3. Food Production Facility List (even if self-prep)
4. Site Applications
5. Budget Detail: Complete after all sites have been entered and submitted error free
6. Checklist Summary for sponsors and sites (supporting documents)
7. Submit completed application packet for approval

## Process Required for Child and Adult Care Food Program Sponsors to Serve Meals During the Ordered Day Care Closure Period

### Request a waiver to serve meals during the day care closure period

Child and Adult Care Food Program sponsors that are no longer allowed to provide child or adult care services during the ordered day care closure period but opt to serve non-congregate meals during the closure period must complete the Child and Adult Care Food Program [Feeding Children Using Non-Congregate Meal Service During Coronavirus \(COVID-19\) Related Public Health Emergency Application](#). When completing the application, Child and Adult Care Food Program sponsors must provide information about the following:

- Participating Child and Adult Care Food Program sites;
- Non-congregate feeding start date;
- Meal distribution methods used;
- Methods for communicating meal availability with families; and
- How Child and Adult Care Food Program sponsors will conduct program oversight.

Each Child and Adult Care Food Program sponsor also must upload a list of sites offering non-congregate meals to its Claims Reimbursement and Reporting System (CRRS) Application Packet under “**Checklist.**”

Child and Adult Care Food Program sponsors with temporary pandemic child care center licenses do not need to submit any additional documentation and should continue to operate the Child and Adult Care Food Program as normal.

### Meal Pattern Requirements

Meals must meet the regular menu planning requirements of the [Summer Food Service Program](#) or [Seamless Summer Option](#), which follows the National School Lunch Program (NSLP) menu planning. 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 foods also may be used. (Note: If a school encounters a situation where it runs out of an item that prevents the achievement of a unitized meal, it should immediately contact the Ohio Department of Education to notify of the situation, but then continue to serve meals.)

Child and Adult Care Food Program meals must meet the regular menu **planning requirements unless the sponsor is experiencing a food shortage. Sponsors experiencing difficulties providing all the meal components due to a food shortage must submit a Food Shortages During Coronavirus (COVID-19) Related Unanticipated School Closures Application.** Upon receipt, the assigned education program specialist will work with the sponsor on meal pattern flexibilities.

## Non-Congregate Feeding Options

Schools choosing to feed students can use non-congregate feeding options during the ordered school-building closure period. Non-congregate feeding sites are those where the meal is consumed offsite. The following options are available to schools:

- Meal distribution at a school site
- Meals delivered to set locations in neighborhoods
- Volunteers delivering meals to households
- Meal distribution at a community location
- Other methods as identified (including by mail)

Child and Adult Care Food Program sponsors no longer providing child care **or adult day care** but choosing to continue feeding children can use non-congregate feeding options. Non-congregate feeding sites are those where the meal is provided for off-site consumption. The following options are available to Child and Adult Care Food Program sponsors:

- Meal distribution at the Child and Adult Care Food Program site;
- Volunteers delivering meals to households.

If schools or Child and Adult Care Food Program sponsors deliver meals to households, they must:

1. Seek approval from the local or county health department for the school's chosen mode of delivery.
2. Ensure that volunteers or non-food service employees sign an appropriate non-disclosure form to protect private information about eligible students and households.
3. In cases where volunteers or non-food service employees are used to provide home-meal delivery, obtain the consent of the household for information about the family's free and reduced meal status being shared with delivery personnel to facilitate service of meals to the children. (This is an important privacy protection.)

Multi-Day Distribution: Schools are permitted to deliver up to one week of meals at a time. In the Seamless Summer Option or Summer Food Service Program application, the school food authority must detail to the Office of Integrated Student Supports its multi-day distribution approach.

Requirements for Mailing: If a school decides to mail shelf-stable, reimbursable meals to households, postage would be an allowable cost using food service funds.

Collaboration with Local Health Department: Schools and Child and Adult Care Food Program sponsors are encouraged to work with their local or county health department to determine the safest non-congregate feeding option for their district.

Shelf-Stable Foods: To further ensure food safety, schools and Child and Adult Care Food Program sponsors may choose to select shelf-stable foods that meet the meal components including shelf-stable milk.

## Meal Pickup Without Children Present

Parents, guardians or agencies are permitted to pick up non-congregate meals without children present. Child nutrition program sponsors should make a good faith effort to ensure food is being picked up for children when allowing meal pickup without children present. The Ohio [Parent, Guardian or Agency Meal Pickup Without Children Present policy](#) provides additional information and guidance.



## School Bus Safety and Emergency Service

During the coronavirus-related ordered school-building closure, many schools are transporting meals to students using school buses and school transportation vehicles. Some schools have expressed concerns for the safety of their personnel while transporting these meals.

The Ohio State Highway Patrol is providing an optional service and will partner with those schools that request assistance to provide safety and emergency services. Troopers will report to the schools to ensure meals are safely loaded on transportation vehicles and follow buses during delivery of the meals. This partnership will provide safety to transportation staff, our communities and the students receiving meals. All Ohio State Highway Patrol services will be dependent on personnel availability.

Any school that would like assistance from the Ohio State Highway Patrol should send an email to [ADFLDOPSLCS@dps.ohio.gov](mailto:ADFLDOPSLCS@dps.ohio.gov) with its meal plan, times, pickup location and number of routes. The school will be notified by email of the availability of a trooper and the local post contact information.

## Claims for Reimbursement for the National School Lunch and School Breakfast Programs

### Reimbursement claims for meals served before the ordered school-building closure:

School meals served prior to the unanticipated ordered school-building closure period under the National School Lunch Program (NSLP) and School Breakfast Program (SBP) must follow the Child Nutrition Program's [claim deadline requirements](#). Claims for reimbursement are submitted through the [Claims Reimbursement and Reporting System \(CRRS\)](#).

### Reimbursement claims for meals served during the ordered school-building closure:

Reimbursement claims for meals served during the ordered school-building closure are submitted in the CRRS under the program the school selected to operate during the closure. If a school opts to serve under the Seamless Summer Option (SSO), claims are submitted in the CRRS School Nutrition Program module. If a school opts to serve under the Summer Food Service Program (SFSP), claims are submitted in the CRRS Summer Food Service Program module.

Log in to the [CRRS](#) and select the School Nutrition Program for the Seamless Summer Option or Summer Food Service Program module.

- Click the **Claims** section and then select **Claim – SSO or Claim – SFSP**. This displays the Claim Year Summary screen.
- Select the **Claim Month** to display the Claim Month Details screen.
- Select the site, enter all claim information then click **Save and Finish**.
- Click **Continue**, check **Certification** box and then **Submit for Payment** and **Finished**.

Schools may not submit a claim for a month that does not have an approved application packet in effect. If you cannot access claims for a specific month, check that the application packet is approved for that month. If your application packet is approved and you still are unable to submit a claim, contact your assigned education program specialist.

## Submitting the March 2020 claim for reimbursement for schools operating the Seamless Summer Option

Schools serving meals under the Seamless Summer Option in March as a result of the ordered school-building closure must submit two claims for reimbursement — one for meals served *before* the ordered school-building closure and one for meals served *during* the ordered school-building closure. All claims for reimbursement are submitted in the [Claims Reimbursement and Reporting System](#). Claims for meals served *prior* to the ordered school-building closure (March 1-15) are entered in the **Claims** module as normal, select **Claim – SNP**. Claims for meals served under the Seamless Summer Option *during* the ordered school-building closure (March 16-31) are entered in the School Nutrition Program module in the **Claims** module, select **Claim – SSO**.

Child nutrition program sponsors participating in multi-day distribution must claim the meals served based on the day the child is intended to consume the meals. Per normal business practice, a school cannot claim more than one meal per meal type per day for any child. For example, if a school distributes five days of breakfasts and lunches on March 30 for meals the week of March 30-April 3, the school will claim two breakfasts and lunches in March and claim three breakfasts and lunches in April.

## Submitting the March 2020 claim for reimbursement for schools operating the Summer Food Service Program

Schools serving meals under the Summer Food Service Program in March as a result of the ordered school-building closure must submit two claims for reimbursement — one for meals served *before* the ordered school-building closure and one for meals served *during* the ordered school-building closure. All claims for reimbursement are submitted in the [Claims Reimbursement and Reporting System](#). Claims for meals served *prior* to the ordered school-building closure (March 1-15) are entered in the School Nutrition Program module **Claims** section as normal, select **Claim – SNP**. Claims for meals served under the Summer Food Service Program *during* the ordered school-building closure (March 16-31) are entered in the Summer Food Service Program module in the **Claims** section, select **Claim – SFSP**.

Child nutrition program sponsors participating in multi-day distribution must claim the meals served based on the day the child is intended to consume the meals. Per normal business practice, a school cannot claim more than one meal per meal type per day for any child. For example, if a school distributes five days of breakfasts and lunches on March 30 for meals the week of March 30-April 3, the school will claim two breakfasts and lunches in March and claim three breakfasts and lunches in April.

## Claims for Reimbursement for the Child and Adult Care Food Program

Reimbursement claims for meals served by Child and Adult Care Food Program sponsors before and during the ordered period of child care closure must follow the Child Nutrition Program's claim deadline requirements. Claims for reimbursement are submitted through the [Claims Reimbursement and Reporting System \(CRRS\)](#).

Child and Adult Care Food Program sponsors operating on temporary pandemic child care center licenses must continue to follow claims deadline requirements and submit claims for reimbursement through the Claims Reimbursement and Reporting System (CRRS).

## Other Considerations for Schools Participating in USDA Foods Program

Canceling scheduled food supply deliveries from state warehouses to schools: Schools participating in the USDA Foods Program are permitted to cancel scheduled deliveries of USDA Foods. For direct deliveries from the state-contracted warehouse, please contact [Christine Farmer](#) or [Justin Chapman](#) with the scheduled delivery date and location. Schools must notify the Ohio Department of Education by 12 p.m. the day before the scheduled delivery.



Changing Delivery Locations: Schools may also change delivery locations to accommodate delivery location closures. Schools may opt to consolidate orders to one delivery location if needed. For direct deliveries from the state-contracted warehouse, please contact [Christine Farmer](#) or [Justin Chapman](#) with the new delivery location and dates of operation.

Co-Operative Purchasing Groups: Schools that receive USDA Foods through a co-operative purchasing group (co-op) must work with their co-op administrator to modify deliveries.

1. Department of Defense Fresh Fruit and Vegetable Program Participants: Schools that participate in the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program must contact Premier Produce One directly to cancel or modify orders. Contact [Casey Bauer](#) at Premier Produce One.

Expiration Dates: For all USDA Foods, schools should note the expiration dates of all products and take steps to use or dispose of perishable food inventories before the expiration date. Schools may contact manufacturers to verify a product's expiration date. If a school cannot use products prior to the expiration date, the school may donate those items to charitable organizations such as a food bank. Keep a record of any donated or disposed items.

## Procurement of Goods and Service

Under 7 CFR 200.320(f)(2), the declared national emergency due to coronavirus (COVID-19) allows the use of emergency contracts (procurement by noncompetitive proposals). Sponsors should attempt competitive procurement to the greatest extent possible and document when noncompetitive procurement was conducted.

## Schools Opting Not to Serve Meals

Schools and districts should make all decisions in the best interest of the health and safety of students and the community. Local school districts have the discretion to serve meals during the ordered school-building closure period; however, schools and community organizations are encouraged to ensure that the needs of low-income children are met during extended school dismissals. Schools should communicate and work with local community partners and organizations to identify ways to serve children during a school closure.

## Additional School Nutrition Food Program Waivers Being Requested

**Waiver for an Extension of the 60-day Claim Deadline:** The Ohio Department of Education filed a waiver with the USDA that would permit the Ohio Department of Education to consider claims for reimbursement submitted late specifically due to coronavirus-related circumstances outside the control of the sponsor and thus not subject to one-time exception requirements. The Ohio Department of Education seeks authority to process and pay these claims for reimbursement without prior approval from USDA Food and Nutrition Services and has requested approval for an extension of the 60-day claim deadline for all child nutrition programs.

**Waiver for Meal Pattern Flexibility in the Seamless Summer Option:** The Ohio Department of Education filed a waiver with the USDA that would allow school food authorities operating the Seamless Summer Option to follow either the Summer Food Service Program or the Seamless Summer Option meal pattern requirements.

## Please check back for updates to this document frequently.

For more information and questions, contact: [Child.Nutrition@education.ohio.gov](mailto:Child.Nutrition@education.ohio.gov) or contact your Education Program Specialist.