

**To:** National School Lunch Program School Food Authorities (SFAs) and Summer Food Service Program (SFSP) Sponsors Serving Meals During the Ordered School-Building Closure

**From:** Brigette Hires, Child Nutrition Program Manager  
Office of Integrated Student Supports

**Date:** April 2, 2020

**Re:** Area Eligibility During the COVID-19 Outbreak

**Purpose:** This policy provides guidance to a) National School Lunch Program (NSLP) School Food Authorities operating under the Seamless Summer Option (SSO) or b) Summer Food Service Program (SFSP) sponsors about expanding area eligibility during the coronavirus (COVID-19) meal distribution process.

**Overview:** Under the Richard B. Russell National School Lunch Act section 13(a)(1)(A) and program regulations at 7 CFR 225.2, 225.6(c)(2)(i)(G), 225.6(c)(3)(i)(B), 225.6(d)(1)(i), 225.14(c)(3) and 225.16(b)(4), sponsors are required to conduct regularly scheduled food service for children from areas in which poor economic conditions exist. The act and cited regulations envision program operators maintaining children's access to nutritious meals during the summer months and supporting families experiencing financial hardship. However, the U.S. Department of Agriculture (USDA) Food and Nutrition Service recognizes that during the current public health emergency, households in areas that do not meet the criteria of poor economic conditions may be facing financial hardship.

In keeping with the goal of maintaining children's access to nutritious meals during the coronavirus pandemic, on March 28, 2020, the USDA issued to the Ohio Department of Education a waiver related to the restrictions of site eligibility requirements. This waiver, effective March 18, 2020, allows Summer Food Service Program and Seamless Summer Option sponsors in good standing to operate open sites in areas approved by the Ohio Department Education.

**Policy:** Pursuant to the waiver, during the COVID-19 outbreak, the Ohio Department of Education has determined that School Food Authority and Summer Food Service Program sites with 30 percent or more enrolled students eligible for free and reduced-price meals or located in a [Census Block Group or Census Tract](#) in which 30 percent or more of the children are eligible for free or reduced-price meals may operate as open sites. As open sites, all meals served to children ages 1-18 may be claimed and reimbursed at the free rate.

Area eligibility is determined by data provided in the [October 2019 Data for Free and Reduced-Price Meals](#). The Ohio Department of Education will notify School Food Authorities operating at sites with 30-50 percent of enrolled students eligible for free or reduced-price meals of the new area eligibility qualification.

To operate an open site, School Food Authorities and Summer Food Service Program Sponsors must complete one of the following steps:

- School Food Authorities and Summer Food Service Program sponsors currently serving meals as closed enrolled sites (limited to serving only free and reduced-price eligible children) that want to change to open sites must revise their Site Applications in the [Claims Reimbursement and Reporting System](#) (CRRS).
- School Food Authorities currently not serving meals but that wish to serve meals during the ordered school-building closure must complete the [Feeding Children During Coronavirus \(COVID-19\) Related Unanticipated School Closures](#) application and fully complete and submit the Seamless Summer Option or Summer Food Service Program application in [CRRS](#).
- Summer Food Service Program sponsors currently not serving meals but that wish to serve meals during the ordered school-building closure must fully complete and submit the Summer Food Service Program application in [CRRS](#).

Additional area eligibility may be determined based on coronavirus-related economic hardship. School Food Authorities and Summer Food Service Program sponsors will be notified in the upcoming weeks if they are eligible to operate as open sites due to economic hardship.

**Duration:** This policy is effective immediately and remains in effect until June 30, 2020, or until expiration of the federally declared public health emergency, whichever is earlier.