

Old Capitol Building
PO Box 47200
Olympia, WA 98504-7200



Washington Office of Superintendent of
PUBLIC INSTRUCTION
Chris Reykdal, Superintendent

k12.wa.us

July 31, 2020

Action Required

Due date: N/A

Informational

BULLETIN NO. 059-20 CNS

TO: Educational Service District Superintendents
School District Superintendents
School District Business Managers

FROM: Chris Reykdal, Superintendent of Public Instruction

RE: School Nutrition Programs Guide to Returning to School

CONTACT: Leanne Eko, RD, SNS – Director of Child Nutrition Services
360-725-0410, leanne.eko@k12.wa.us

PURPOSE/BACKGROUND

OSPI released the [Reopening Washington Schools 2020: District Planning Guide](#), which provided recommendations and guidance for school districts as they plan for the reopening of schools. This bulletin provides additional details regarding school meals and school reopening.

Many students rely on school meals to meet their nutritional needs. In addition, the economic impact of COVID-19 has resulted in more families needing assistance. The intent and purpose of U.S. Department of Agriculture (USDA) Child Nutrition Programs to ensure access to meals for students in need. Meal service is expected to continue whether instruction is happening in-person or remotely.

USDA WAIVERS

Many of the rules and regulations of the USDA Child Nutrition Programs (CNP) do not transfer well to a COVID-19 environment. In the Spring of 2020 during the initial pandemic outbreak, schools were required to close. This unexpected school closure allowed for the operation of the Summer Food Service Program (SFSP) under the Emergency School Closure Guidelines. Operation of SFSP, along with multiple USDA nationwide waivers, allowed schools to provide meals to all children ages 0 to 18 years at all sites distributing meals. There was no requirement to obtain or track individual student names or eligibility categories.

For school year 2020-21, although the typical school day model may look significantly different, schools will be "open". Therefore, USDA is requiring schools to operate School Meal Programs. The most significant difference from Spring 2020 will be the requirement to complete by name and category (free/reduced-price/paid) meal counts. Meals provided to students must be accurately documented and charged to the appropriate accounts. We encourage district administration and food service staff work closely together to develop meal distribution plans that meet the needs of students and families, while following federal requirements.

We encourage district administration and food service staff to work closely together to form meal service distribution plans that meet the needs of students and families, while following federal requirements.

Nationwide Waivers

USDA has issued the following nationwide waivers for school year 2020-21:

- Non-Congregate Feeding
- Meal Service Time Flexibility
- Meal Pattern Flexibility (approved on a case-by-case basis)
- Parent/Guardian Meal Pick-up
- Offer Versus Serve Flexibility

Non-Congregate Feeding:

This waiver allows meals to be taken off site, allowing for distribution of grab and go meals.

Meal Service Time Flexibility:

This waiver allows schools to offer multiple meals at one time. Please note: Unlike the SFSP, school meals are intended for a five-day week. Weekend meals may not be claimed.

Parent/Guardian Meal Pick-up:

Similar to meals provided this spring, meals may be picked up by a parent or guardian. However, due to the by name meal counts required by school meal programs, identification and student information will need to be obtained and verified at the time of meal pick-up.

Meal Pattern Flexibility:

This waiver allows meals to be served that do not meet the NSLP/SBP meal pattern. This waiver requires districts to submit individual requests describing the flexibility needed and justification. OSPI CNS is putting a process in place to assist districts in outlining and submitting their meal pattern flexibility needs as part of a meal distribution plan.

Offer Versus Serve (OVS) Flexibility:

This waiver removes the requirement to provide meals in an OVS model for high school students allowing for distribution of pre-packed ready to go meals. Offer vs. Serve is not required in grades K-8.

State-Specific Waivers

States have the option to request individual waivers specific to their state. OSPI Child Nutrition Services (CNS) continues to monitor the waivers issued nationwide and determine if and what state waivers may be needed to support program operators. Waivers currently under consideration include:

Potable Water:

This waiver would remove the requirement for students to have access to water during meal service. While we encourage student access to water, we understand the need to decrease the number of touchpoints in schools.

Fresh Fruit and Vegetable Program (FFVP) Waivers:

These waivers would align FFVP requirements to match distribution methods being used to deliver meals.

We continue to share your concerns regarding meal distribution that includes by name meal counts with USDA. Depending on USDA or federal actions taken, we will consider waiver requests to support districts including options such as Universal Free Meals or operation of the SFSP.

SCHEDULING CONCEPTS AND MEAL DISTRIBUTION MODELS

Split or Rotating Schedules

Split or rotating schedules may entail different configurations of groups of students on campus, on campus some days and remote learning on other days. Off campus, remote learning is considered an "operational day" and meals may be offered to students.

Remote Learning

Schools must have a plan in place for total remote learning if school buildings are closed. This plan should include meal service and meal distribution in a grab and go or delivery model.

DEPARTMENT OF HEALTH REQUIREMENTS AND GUIDELINES

The Washington State Department of Health (DOH), in collaboration with the Office of the Governor and OSPI, has provided the rules and guidance for student and staff health and safety.

Schools must follow DOH requirements and guidelines, including the following:

- Physical Distancing/Reducing Touchpoints
- Face Coverings and Masks
- Sanitizing and Disinfecting

See pages 24-26 of the [Reopening Washington Schools 2020: District Planning Guide](#) for district wide information. Information specific to food service includes the following areas:

Meals

- Limit gatherings and potential mixing of classes or groups in the cafeteria or other communal spaces.
- Stagger mealtimes in lunchroom or dining hall. Arrange the flow of students to reduce crowding such as at handwashing sinks, food vending areas, etc.
- Individually plate food for each student. The staff (not students) should handle utensils and serve food to reduce the spread of germs.

Masks

- Face coverings and masks are important tools in preventing the spread of COVID-19. Requirements for face coverings for employees is governed by Washington State Department of Labor & Industries (L&I) regulations and is tied to the task the worker is performing.
- Tasks performed by kitchen workers are identified as medium risk, requiring **disposable face masks**. Additional information can be found in the [Which Mask for Which Task](#) publication.

Sanitizing and Disinfecting Before and After Meal Service

Schools should update infection control plans to reflect what is known about COVID-19. While school food service has Standard Operating Procedures in place for cleaning and sanitizing, COVID-19 requires *disinfecting* of surfaces between students. Some disinfectants are **not** compatible with food service locations or require rinsing. Carefully read and follow label directions and work closely with your district's Facility Director to identify and procure appropriate disinfecting products.

INFORMATION AND ASSISTANCE

OSPI Child Nutrition Services continues to host weekly webinars for school food service staff. Email [Samantha Brueske](#), Training and Communications Specialist, to be added to the invite list. A ***School Nutrition Programs Guide to Returning to School*** with additional details and best practices is also being prepared and will be distributed soon.

For questions regarding this bulletin, please contact Liz Beechler, School Meal Programs Supervisor, at 360-725-0440 or email [Liz Beechler](#), National School Lunch Program Supervisor. The OSPI TTY number is 360-664-3631.

This bulletin is also available on the [Bulletins](#) page of the OSPI website.

Jamila B. Thomas
Chief of Staff

T.J. Kelly
Assistant Superintendent
Financial Resources

Leanne Eko, RD, SNS
Director
Child Nutrition Services

CR:al

Assurance Statement

The Sponsor hereby agrees that it will comply with: i. Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d et seq.); ii. Title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.); iii. Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794); iv. Age Discrimination Act of

1975 (42 U.S.C. 6101 et seq.); v. Title II and Title III of the Americans with Disabilities Act (ADA) of 1990 as amended by the ADA Amendment Act of 2008 (42 U.S.C. 12131-12189); vi. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." (August 11, 2000); vii. All provisions required by the implementing regulations of the Department of Agriculture (USDA) (7 CFR Part 15 et seq.); viii. Department of Justice Enforcement Guidelines (28 CFR Parts 35, 42 and 50.3); ix. Food and Nutrition Service (FNS) directives and guidelines to the effect that, no person shall, on the grounds of race, color, national origin, sex, age, or disability, be excluded from participation in, be denied the benefits

of, or otherwise be subject to discrimination under any program or activity for which the Program applicant receives Federal financial assistance from USDA; and hereby gives assurance that it will immediately take measures necessary to effectuate this Agreement. x. The USDA non-discrimination statement that in accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs).

This assurance is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants, and loans of Federal funds, reimbursable expenditures, grant, or donation of Federal property and interest in property, the detail of Federal personnel, the sale and lease of, and the permission to use Federal property or interest in such property or the furnishing of services without consideration or at a nominal consideration, or at a consideration that is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be served by such sale, lease, or furnishing of services to the recipient, or any improvements made with Federal financial assistance extended to the Program applicant by USDA. This includes any Federal agreement, arrangement, or other contract that has as one of its purposes the provision of cash assistance for the purchase of food, and cash assistance for purchase or rental of food service equipment or any other financial assistance extended in reliance on the representations and agreements made in this assurance.

By accepting this assurance, the Sponsor agrees to compile data, maintain records, and submit records and reports as required, to permit effective enforcement of nondiscrimination laws and permit authorized USDA personnel during hours of program operation to review and copy such records, books, and accounts, access such facilities and interview such personnel as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, the Department of Agriculture, FNS, shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the Sponsor, its successors, transferees and assignees as long as it receives assistance or retains possession of any assistance from USDA.

OSPI provides equal access to all programs and services without discrimination based on sex, race, creed, religion, color, national origin, age, honorably discharged veteran or military status, sexual orientation, gender expression, gender identity, disability, or the use of a trained dog guide or service animal by a person with a disability. Questions and complaints of alleged discrimination should be directed to the Equity and Civil Rights Director at 360-725-6162/TTY: 360-664-3631; or P.O. Box 47200, Olympia, WA 98504-7200; or equity@k12.wa.us.