TN Department of **Education**

SCHOOL NUTRITION

SCHOOL REOPENING TOOLKIT: NUTRITION

Through school closures, summer breaks, and re-opening, school nutrition programming remains a crucial support to students and families by providing meal services in normal and uncertain times. Districts should build on the experiences of the spring school closures in 2020 to inform strategies on how to ensure continuity of meal services through new and evolving contexts. This toolkit provides an overview for district leaders and local school nutrition directors on strategies and considerations to approach re-opening of schools, exploring alternative nutrition operations, and capturing the best practices from the spring closures. As districts map out goals for what school will look like in the upcoming academic year, these resources may be used to inform decisions related to how school nutrition may continue to meet student needs in a variety of settings, especially when students are unable to get to meals. As always, the department remains committed to seeking additional supports and flexibilities from the U.S. Department of Agriculture in the form of guidance and waivers. If any questions arise on allowable practices or potentially required waivers to implement a strategy, please contact your regional nutrition consultant for guidance and support.

All information in the document is non-regulatory guidance issued for general informational purposes only. This document is not intended to constitute legal advice. Because local school board policy and unique facts make dramatic differences in analyzing any situation, the Tennessee Department of Education advises each school district to consult with the local school board attorney for specific legal advice regarding the impact of the COVID-19 pandemic on school operations.

II. Checklist

☐ *Close-Out Seamless Summer Option (SSO) Operations*

Operating under the SSO program, along with additional waivers, school food authorities (SFAs) will need to close out programming, including:

- o Determine end date of SSO meal service.
- o Communicate to staff and families (see below).
- o Identify staff needed and relocate any shifted equipment or equipment used for meal delivery back to original sites.
- o Conduct inventory of supplies and equipment to validate sites have resources that may have been used elsewhere during SSO operations.
- o Ensure all appropriate SSO claims have been submitted in the allocated time period for claims within the Tennessee: Meals, Accounting, and Claiming (TMAC) system. [Once school resumes, all claims will be submitted under National School Lunch Program (NSLP).]
- o Review financials to identify any issues or concerns that have been uncovered during COVID-19 and to address all concerns with appropriate parties. This should be done prior to transitioning back to normal National School Lunch Program (NSLP) and School Breakfast Program (SBP) operations.

☐ *Communicate with Families*

Assuming standard NSLP meal service resumes and waivers expire, nutrition programs should communicate the end of specific flexibilities afforded under the SSO program and waivers due to the COVID-19 outbreak. This should include an emphasis on encouraging families to apply for meal benefits as many household incomes will have been impacted during this period.

- o Develop and disseminate clear communication points, at the earliest possible date, to include:
    - o End date of SSO service and beginning date of NSLP service
    - o Key program changes between SSO and NSLP (including that some families may have been receiving meals at no cost that will not be eligible to do so under NSLP without a meals benefit application signaling eligibility)
    - o Meal offerings by location
    - o Information on meal benefit applications, including general eligibility requirements
    - o Points of contact to assist with questions and meal benefits applications
- o Use SSO meal service delivery and other communication strategies (including the same used to communicate SSO services being launched) to message changes in service.
- o Provide additional supports on meal benefits applications, including phone support options and in-person supports as available at school sites to assist families in completing forms.

☐ **Revise, Refine, and Launch NSLP Services**

While school food authorities (SFAs) should complete the same annual preparation and opening steps as in any other year, local nutrition teams should do so while considering any program revisions or refinements needed to relaunch NSLP services with additional emphasis on health and safety (see sections V & VI for more context):

- o **Review and Refine NSLP Plans:** Review Section V of this document and consider health and safety contexts as you review and revise your plan for distributing school nutrition program (SNP) and consider the following steps in light of any potential changes to distribution model. *If considering an alternate school schedule in district, consider SBP and NSLP distribution for students who are engaging in remote learning. Leverage regional nutrition consultants to brainstorm approaches and regulatory considerations, including needed waivers.*

- o **Check-in with Staff:** Contact nutrition staff members to check-in on status to begin work with the launch of NSLP services. The SFA should validate staff's intent to return, and make any needed additional hires to resume services with the start of the school year.

- o **Check-in with Vendors and Suppliers:** Contact representatives of any vendors/suppliers used in the nutrition program. The unexpected closures may have impacted supply chains or availability of certain services, and it will be important to account for any of these changes prior to the start of standard operations.

- o **Plan Meals Accordingly:** In alignment with any implications identified above, adjust as needed in developing the meal cycle.

- o **Administrative Reviews (AR) & Procurement Reviews (PR):** If an SFA was slated to have either an AR or PR conducted during the unexpected closure period, please note guidance will be provided by regional consultants on when the reviews will be rescheduled.

- o **Plan for Potential Future School Closure:** As you plan for the coming year, build in contingencies to allow for quick adjustments to distribution model depending on local health conditions and school building closures (see Section VI for considerations). Consider codifying the steps taken during the 2019-20 school year to ensure continuity of services as a road map on strategies to utilize again and those in need of improvement.

III. Best Practices

Provide Meal Benefit Applications at Multiple Opportunities

SFAs are encouraged to provide applications to families for free and reduced price meal benefits on numerous occasions to promote the service. As the economic conditions have shifted due to the novel coronavirus, more families may now qualify for benefits. A family can submit a new application at any time during the school year. SFAs should consider multiple avenues for families to access these applications, such as:

- o Use the meal delivery services under SSO as an opportunity to attach meal benefit applications to meals already being delivered;
- o Make applications available online and at front office of each school site;
- o Ensure nutrition staff or other team member is present in office or via phone to assist families in completing the application.

Check-in with Suppliers and Vendors

As conditions return to normal, there may still be disruptions in the supply chain and/or delivery schedules. SFAs may need to adapt cycle menus to meet any changes in food or product availability. This is not limited to food supplies, as the availability of cleaning supplies and paper goods have also been stressed during the coronavirus outbreak. Some services may be procured outside of the nutrition program (e.g. custodial services) but have implications on the programs ability to relaunch. To ensure that meal services may resume standard operations, nutrition directors should be in contact with both suppliers/vendors and other district operations on which they rely to provide services.

IV. Recommended Schedules and Procedures

Overall, each SFA will need to review finances, staffing, and any operational concerns, contact appropriate stakeholders for needed follow up. All SFAs will need to advertise free and reduced price meal applications to parents and guardians. Each SFA will need to ensure all SSO claims have been submitted during the school closures and will need to transition into normal NSLP and SBP operations as schools re-open. Please refer to Section V of this document for more detailed safety guidelines regarding schedules and procedures for implementing preventative measures upon reopening. Please refer to Section VI of this document for more detailed guidelines regarding schedules and procedures in the event of future school closure.

Close-Out Seamless Summer Option (SSO) Operations

Operating under the SSO program, along with additional waivers, school food authorities (SFAs) will need to close out programming, including:

Action Items	Complete
Determine end date of SSO meal service.	
Communicate to staff and families (see below).	
Identify staff needed and relocate any shifted equipment or equipment used for meal delivery back to original sites.	
Conduct inventory of supplies and equipment to validate sites have resources that may have been used elsewhere during SSO operations.	
Ensure all appropriate SSO claims have been submitted in the allocated time period for claims within the TMAC system. (Once school resumes, all claims will be submitted under NSLP.)	
Review financials to identify any issues or concerns that have been uncovered during COVID-19 and to address all concerns with appropriate parties. This should be done prior to transitioning back to normal NSLP and SBP operations.	

Communicate with Families

As standard NSLP meal service resumes and waivers expire, nutrition programs should communicate the end of specific flexibilities afforded under the SSO program and waivers due to COVID-19.

Action Items	Complete

Develop key communication points to include:
   o End date of SSO service and beginning date of NSLP service
   o Key program changes between SSO and NSLP (including that some families may have been receiving meals at no cost that will not be eligible to do so under NSLP without a meals benefit application signaling eligibility)
   o Meal offerings by location
   o Information on meal benefit applications
   o Points of contact to assist with questions and meal benefits applications	

Use SSO meal service delivery and other communication strategies (including the same used to communicate SSO services being launched) to message any changes.	
Provide additional supports on meal benefits applications, including phone options and in-person supports at school sites to assist families in completing forms.	

Launch NSLP Services

While SFAs should complete the same annual launch process steps as in any other year, local nutrition teams should also prepare for standard NSLP operations by reviewing the following:

Action Items	Complete
Check-in with Staff: Contact nutrition staff members to check-in on status to begin work with the launch of NSLP services. The SFA should validate staff's intent to return and make any needed hires to resume services by the start of the school year.	
Check-in with Vendors and Suppliers: Contact representatives of any vendors or suppliers used in the nutrition program. The closures may have impacted supply chains or availability of certain services, and it will be important to account for any of these changes prior to the start of standard operations. For commodities and DOD Produce, contact the Tennessee Department of Agriculture/delivery contractor and advise of changes to usage, delivery times, and delivery locations.	
Plan Meals Accordingly: In alignment with any implications identified above, adjust as needed in developing the meal cycle.	
Administrative Reviews (AR) & Procurement Reviews (PR): If an SFA was slated to have either an AR or PR conducted during the unexpected closure period, please note guidance will be provided by regional consultants on when the reviews will be rescheduled.	

V. Safety Guidelines for Re-opening

SFAs should ensure appropriate standard operating procedures (SOP) are in place to address the guidelines below regarding preventative measures upon re-opening school nutrition programs. Please refer to Section VII of this document for more detail regarding things to consider for various re-opening scenarios.

- The Centers for Disease Control (CDC) recommends limiting exposure to large groups of people. Use spacing strategies to create a six-foot distance between people. Consider altering the staffing schedules and physical workspace to accommodate distancing. This could involve staff members working at different workstations. It could involve innovative meal delivery systems when providing meals to children.
- Avoid one-on-one contact with individuals (hugs, handshakes, high fives, etc.).
- Ensure nutrition program employees are trained on any district expectations related to daily health screenings and that employees showing symptoms of COVID-19 are directed to immediately be tested and to self-isolate for the recommended 14 day period. Districts should establish protocols in collaboration with the health departments to set guidance on when a staff member may return to work.
- Maintain social distancing during meal service or meal delivery.
    - Meals served on-site should be placed on a counter or tray line for quick pick up.
    - Meals for curb-side pick-up should be placed on a table or placed in the trunk of the vehicle to minimize person-to-person contact.
    - Limit social interactions to speed up service and minimize contact time.
- Comply with all policies for reporting notifiable illnesses to administrative personnel and/or public health departments.
- Cross-train program staff to perform essential activities in the event of key absences or emergency situations.
- Reinforce and closely monitor personal hygiene practices.
    - Wash hands properly and frequently. Many diseases and conditions are spread by not washing hands with soap and clean, running water. Refer to the Hand Washing SOP
    - Apply the "no bare hand contact" rule. Wear single-use food gloves when handling ready-to-eat foods. As a best practice, wear single-use gloves when handling or delivering all foods.
    - As a best practice, wear a disposable apron when handling or delivering foods.
    - Strongly reinforce health and hygiene activities. Refer to the Personal Hygiene SOP.
    - Avoid touching eyes, nose, or mouth.
    - Follow appropriate coughing and sneezing etiquette. Cough or sneeze using a disposable tissue or elbow, followed by proper handwashing at all times.

- Allow only program staff, custodial staff, and approved volunteers to enter program areas.
- Routinely clean and disinfect high-touch nonfood-contact surfaces, such as door handles, light switches, phones, keyboards, tray slides, etc. Disinfectants are chemical products that destroy or inactivate germs.
  - Use properly diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and/or EPA-registered disinfectants.
  - Disinfecting solutions can be transferred to the spray bottle for easier application to areas that need to be disinfected.
  - Allow the disinfectant to remain in contact with the surface for the appropriate amount of time. Follow manufacturer's instructions for contact time.
  - Diluted household bleach disinfecting solutions can be used if appropriate for the surface. Prepare by mixing 1/3 cup bleach per gallon of warm water, wearing glove and eye protections and mixing in a well-ventilated area. Contact time for a chlorine bleach solution is about 5 minutes.
- Clean and sanitize food contact surfaces before and after each use. See the <u>Cleaning and Sanitizing Food Contact Surfaces SOP</u>.
- Handle program wastes properly.
- Discontinue use of share table options temporarily (e.g. practices of collecting unconsumed food and beverage items to reduce waste and encourage consumption of food served).
- Consider alternative serving methods and logistics entailed for alternative schedules and rolling closures.
  - Serve all or some meals and snacks in the classroom.
    - Students could take meals from cafeteria to classroom.
    - Develop meal counting procedures for meals served outside of the cafeteria. Procedures will depend on eligibility determinations – CEP, Provision 2, or Free/Reduced/Paid status.
  - Alternate between meal service in classroom and cafeteria – by grade, classroom, hallway, A/B schedule. All students should have an opportunity for a dining room experience.
  - Teachers take meal orders in classroom and send order to the kitchen via email, Google Docs, SharePoint, etc.
  - Students could pick up meals at building entrances or security checkpoints.
  - Longer meal service times will be required for any meals served in the cafeteria to promote social distancing protocols.
  - Offer Versus Serve (OVS) must be considered for grades 9-12 for lunch.
    - Seek an OVS waiver for grades 9-12.
  - Lunch in the Classroom can be implemented in grades k-8 without OVS.
  - The 3-7-day meal pattern should be used for long and short weeks.

- o If an SFA is considering school to be in session and wishes to continue offering National School Lunch Program (NSLP) and School Breakfast Program (SBP) during such building closures, *the SFA may **request** an NSLP and SBP waiver* which would allow schools to offer non-congregate meals when school buildings are closed, but children continue to attend classes online. In this situation, schools would continue to claim and be reimbursed for meals based on the eligibility status of the individual student. All other NSLP and SBP requirements would apply.
  - o Consider limiting the sale of second meals and a la carte items to the cafeteria – no sales when meals are served in the classroom.
- As part of overall emergency preparedness, maintain an updated contact list of key partners at the state and local levels.
- Keep staff, customers, parents, and other stakeholders informed with current and reliable information.
- Work in cooperation with school administration and media to communicate importance of preventative measures, such as handwashing, for all school staff and students.

VI. Safety Guidelines for Potential Future School Closures

In the interest of public health, agencies could make decisions that affect normal program operations. During a pandemic, school closures may be ordered by local, county or state health officials. Schools are not required to provide meal service during school closures, but willingness to continue meal service operations ensures children receive nutritious meals during a public health crisis. Schools should review their implementation of the emergency feeding programs from the spring of 2020 to codify and leverage the strategies that worked well and determine improvements in areas that presented challenges. SFAs should take into consideration recommendations and guidelines listed below and should ensure appropriate SOPs are in place regarding safe meal service in the event that schools should close.

- Defer to federal, state, and local agency protocol and guidance during crisis situations. Agencies are able to assist when conditions disrupt the day-to-day routine on a large scale. Agencies can work with schools in collaborative efforts to maintain a safe food supply and keep program staff safe.
- If available, seek waivers that allow meal flexibilities.
  - o Check with the state agency for a non-congregate waiver that allow for serving bulk foods.

- o Schools may send meals for Same-Day Service and Multi-Day Service with an approved USDA waiver. For meals designated for additional days, a school could send shelf-stable, individually packaged foods that meet USDA's meal pattern requirements or send ready-to-eat foods.
- Codify pre-emptive plan for meal service during emergency periods should closures occur.
  - o Determine service methods that can be used, such as grab and go, curb-side pick-up, and/or meal delivery systems. Remember meals must be prepared in advance and ready to eat off-site.
  - o Plan service locations. Meals may be served in unconventional places, such as parking lots, bus routes, multi-purpose rooms, libraries, parks, etc.
  - o Determine meal accountability procedures.
  - o Identify ways to communicate meal availability.
  - o As part of social distancing measures, the number of people arriving at one time to pick up a meal should be staggered, and social interactions limited.
  - o Strongly reinforce that staff should avoid touching their face (mouth, nose, eyes) during preparation and service of meals.
  - o Plan for proper hand hygiene for the type of service planned.
  - o For remote sites with no working sink, provide hand hygiene capabilities using a portable handwashing station. A portable handwashing station can be set up using a thermal container, soap, paper towels, and a discard bucket.
- The type of meal offered will depend on the resources and capacity of the site. Those sites, that are able to prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets state or local food safety requirements, may do so. Home-delivered meals still have to meet all meal pattern requirements for the designated program. If emergency conditions prevent a school from obtaining a certain food product, such as milk, the state agency may approve the service of meals without the required menu item during the emergency period.
- Meals served must comply with relevant requirements, including documented accommodation requests for children with special dietary needs (e.g. food allergies). Communicate with families in need of special dietary accommodations to make plans for when and where they can obtain special meals.
- Purchase and keep on hand, sufficient quantities of:
  - o Chemicals used to make a sanitizing solution
  - o Disinfectant approved for use in a foodservice facility
  - o Single-use food gloves in several sizes
  - o Disposable service ware suitable for unconventional delivery systems
  - o Shelf-stable foods
  - o Face coverings/masks

- Production records must be completed for each meal.
- Document food safety training provided to newly hired staff and volunteers. Reinforce food safe practices for all program personnel and volunteers.
- Implement and communicate food safety rules as they apply to the planned meal service style.
  - Meals provided to children must be ready-to-eat. Frozen food items in packaging marked "fully cooked" may meet this definition but may only be served if accompanied by the manufacturer's preparation instructions and clear instructions that the food must be consumed or refrigerated within 2 hours.
  - Adapt cycle menus to meet any changes in food or product availability. This is not limited to food supplies, as the availability of cleaning supplies and paper goods have also been stressed during the coronavirus outbreak.
  - Install plexiglass barriers at the point of sale.
  - Procure additional Personal Protective Equipment (PPE).
  - Procure additional carts, bags, and containers to serve lunch in classroom, if necessary.
  - Consider the possibility for equipment shortages if lunch in classroom is implemented.
  - Consider the possibility of additional dumpsters due to increased use of disposable trays, cups, utensils, etc.
  - Revise delivery schedules and locations, and ensure appropriate receiving procedures.
  - Potentially hazardous foods must be held at proper temperatures or have time controls applied when serving reimbursable meals in unconventional ways.
  - If Time as a Public Health Control is used for a cold potentially hazardous food, the food shall have an initial temperature of 41ºF or less when removed from cold holding. The food must be served to the customer or discarded within 4 hours.
  - If Time as a Public Health Control is used for a hot potentially hazardous food, the food shall be cooked to a proper internal temperature and have an internal temperature of 135ºF or greater when removed from hot holding. The food must be served to the customer or discarded within 4 hours. Do not assume households have the means to properly cool food.
  - Refer to the SOP, "Time as a Public Health Control", for more information on using time as the control measure instead of temperature to limit bacteria growth in potentially hazardous foods.
  - Label items packaged on site and made available for self-service with appropriate ingredient information to protect the health and safety of children who experience allergic reactions to specific foods.
  - As a best practice, communicate appropriate food safety actions for customer handling of menu items. For example, milk served as part of a reimbursable meal should be held cold until time of service or delivery and include instructions for consuming the milk within 2 hours. Milk or cold items designated for another day, should include

instructions for storing the milk under refrigeration in the household. A label template is provided here:

Keep Foods Safe – Same Day Service	Keep Foods Safe – Multiple Day Service
Hot foods should be kept hot. Consume hot foods within 2 hours.	Hot foods should be kept hot. Consume hot foods within 2 hours.
Cold foods should be kept cold. Consume or refrigerate cold foods within 2 hours.	Cold foods should be kept cold. Consume or refrigerate cold foods within 2 hours.
Discard leftover foods within 2 days.	

Refer to Section VII for possible scenarios for additional considerations based on state or local board of education plans for returning to school after a closure.

VII. Additional Considerations upon Return to School After a Closure, or Closing After Re-opening

Additional Considerations
- Finances
    - SFAs should check their finances and see if there are any issues or concerns that have been uncovered during COVID-19 and address all concerns with appropriate parties. This should be done prior to transitioning back to normal NSLP and SBP operations.
    - Use correct revenue coding (Chart of Accounts) for each program – NSLP, SBP, Commodities, Seamless Summer Option, etc.
    - Due to unprecedented events and financial strains during the public health emergency, local funds may be needed in order to support the school nutrition program.
- Communication
    - Follow school district policies to communicate changes in school nutrition operations.
    - During the public health emergency, meal benefits have been available to many students that may not usually have access to free meals. As school returns, it will be important to communicate to families that all meals may not be available at no cost to all children.

o More families may now qualify for benefits than prior to public health emergency due to changes in the economy. Remind families that they can submit a new application for free or reduced-price meals at any time during the school year.

- Compliance
  o SFAs should reach out to their regional consultants if there was an Administrative Review or Procurement Review scheduled during the unanticipated school closure due to the public health emergency. The state agency will work with SFA to reschedule that review.
  o Submit all reports and claims for reimbursement to the state agency as required.

- Personnel
  o Create A/B staffing schedules - promotes distancing of employees and limits the total number of employees in the workspace at a given time.
  o Consider the use of temporary employees.
  o Discuss hourly pay, benefits, etc. with district human resources officer.
  o Determine protocols should a nutrition staff member be diagnosed with COVID-19 as it relates to operations and communications, both internally and to the broader school community, including families.

- Transportation
  o Discuss the possibility of bus routes in combination with emergency feeding/SSO operations.
  o Discuss the district transportation plan with administration.
    ▪ Will buses run outside the required transportation area for each school?
    ▪ Will students go directly to the cafeteria or classroom after drop-off?

- Food Safety
  o Revise SFA and site Food Safety Plan to include SOPs for meal service in classroom, additional meal service procedures in the cafeteria, social distancing and PPE during meal prep and delivery, and receiving and storage.
    ▪ ICN Resources
  o Mark serving floor for distancing.
  o No self-service.
  o No salad bars.
  o Install plexiglass barriers at the point of sale.

- Eligibility
  o More families may now qualify for benefits than prior to outbreak of the public health emergency due to changes in the economy. Remind families that they can submit a new application for free or reduced-price meals at any time during the school year.

- Waivers
  o Refer to USDA and State Agency Guidance.

- Programming
    - Seamless Summer Option
        - The NSLP/SBP and SSO cannot operate simultaneously.
        - Operate SSO during school closures.
    - After School Snack Program
        - Students could take a snack home if educational/enrichment requirement is waived for After School Snacks.
    - Fresh Fruit & Vegetable Program
        - Operates as normal in Pre-K-6.
- Department of Human Services (DHS)
    - Encourage operation of At-Risk After School Supper Program through DHS.
    - Area Eligibility applies.

VIII. Resource List

- **NSLP Start-Up Forms**
  Startup Documents
  Series of documents and forms for the launch of NSLP each year.

- **Regional Consultant Contact Information**
  Regional Nutrition Consultant List
  Regional consultant information per district.

- **Free and Reduced-Price Application Instructions**
  Meal Benefits SFA Application Instructions
  Instructions for SFAs to provide families for how to apply to for free and reduce-price meal benefits.

- **Prototype Free & Reduced-Price Meal Application**
  Sample Application
  Prototype application for families to use to apply for free and reduced-price meal benefits.

- **School Nutrition Resources**
  https://www.tn.gov/education/snp-resources.html

CDC Recommendations and Guidance

Use the links below to access additional information from the CDC regarding school-related topics.

- [CDC Fact Sheet for School Nutrition Professionals](#)
- [CDC Guidance for Schools](#)
- Guidance for Cleaning and Disinfecting
  - [General Guidance](#) (Including Schools)
  - [Cleaning & Disinfecting](#)
- [Business and Employer Guidance](#)