

AOE Testimony: Funding for School Lunches

Testimony To: Senate Committee on Agriculture
Respectfully Submitted by: Rosie Krueger, State Director of Child Nutrition Programs
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Vermont schools have been providing meals for distribution since the week of March 16. Every public school School Food Authority (SFA) in the state, as well as several independent school SFAs, have systems in place to offer at least 5 breakfasts and 5 lunches per week to children 18 and under using the federal child nutrition programs. Some are also offering weekend meals. Some SFAs are doing grab-and-go pick up, while others are using school buses to distribute meals to households. Many are offering both options. Almost every SFA is using the Summer Food Service Program (SFSP) to offer these meals, with the remaining few using the Seamless Summer Option (SSO). On 3/29, the USDA granted Vermont's waiver request to allow schools in all parts of the state to serve meals to all children 18 and under and claim all of these meals for federal reimbursement. That waiver was retroactive to 3/20, which allowed many schools who previously would have had to cover the cost of meals served to students who did not qualify as free and reduced to instead claim federal reimbursement for all meals served. Since the waiver was granted, those schools have begun to open up more locations and look to serve all children, not just their own students. Families can call 2-1-1 to find information about the nearest open meal site or distribution route.

Meals served in the SFSP must follow federal regulations for content, but the "meal pattern" for these meals is much simpler than during the school year. The federal reimbursement rates for most locations in the state are \$2.275 for breakfast and \$4.1525 for lunch, which is higher than the reimbursement rate during the school year. In Chittenden, Franklin and Grand Isle counties, the SFSP reimbursement rate is slightly lower if the meals are prepared by an outside entity (\$2.33/\$4.0875). Schools that offer an At-Risk After School Meals through the Child and Adult Care Food Program (CACFP) may provide a 3rd meal 5 days per week to any child 18 and under. There are about 70 schools in the state that offer this program, but not all have taken advantage of being able to offer the 3rd meal during COVID-19. The reimbursement rate for that program is \$3.6575 for supper. Schools may sell additional meals to adults, or a 3rd meal per day for children, as "catering" by charging their "adult meal rate" for those meals. This rate is set by the SFA to cover their costs, but is usually around \$5 for lunch.

Some SFAs are reporting they have additional capacity to prepare even more meals, while others do not. The system currently appears to be functioning well, although

some schools have reported that staff are tired from the extra effort required to prepare these meals, and there is concern about what to do if a kitchen needs to go off-line due to illness among staff. Kitchen staff are often among the lowest paid staff in the school building, and there is some concern about these staff members being required to report for hazardous work while other staff are able to shelter at home. The schools that are able to offer bus distribution are generally doing so in conjunction with busing staff or busing contractors. By most accounts, these relationships are working well. The AOE, in consultation with the Vermont Department of Health, has offered [significant guidance](#) on safe food production and distribution practices to prevent the spread of the virus among kitchen and distribution staff. In addition, the AOE is currently recommending that SFAs consider doing multi-day distributions and breaking kitchen staff up into small teams located in different kitchens or into separate shifts. SFAs may distribute up to one weeks' worth of meals at a time, with notification to the AOE.

The AOE is now developing guidance for next steps, should individual kitchens need to go off-line. This guidance is expected to be distributed the week of April 4th, and includes options for working with neighboring SFAs and procuring meals from catering companies or restaurants. In addition, several non-profit organizations that operate the SFSP or the CACFP during the school year are also offering meals through these programs, and there is some potential to bring on additional non-profits who have operated the SFSP in the past. The AOE has applied for a waiver of the "unitized" meal requirement to allow meals to be provided in bulk, rather than have each meal packaged separately. This would reduce staff labor by allowing, for example, a loaf of bread and a jar of peanut butter to be distributed, instead of a weeks' worth of sandwiches. That waiver has not yet been granted.

If production and distribution capacity within Vermont, or within a region of the state, were to completely fail, the AOE and the SFAs have the option of implementing the "Meals to You" program, which allows 5 breakfasts and 5 lunches per week to be mailed to students of area eligible schools who qualify for free and reduced meals. This program takes several weeks to implement, and the AOE views this as a last resort because many children who are being served now would not be eligible to receive these meals.

SFAs have reported that they are concerned about supply chain disruptions making meal production difficult. There was a brief shortage of milk during the week of 3/23, due to Hood briefly stopping school milk production under the mistaken understanding that schools had stopped producing meals when the school buildings closed. That has been resolved. The USDA has granted a nationwide waiver of the meal pattern requirements for SFSP, which will allow the AOE to approve individual SFA waivers of the meal pattern if the necessary components can't be sourced. However, because the SFSP meal pattern is so flexible, most ingredients can be subbed for another

item without a meal pattern waiver being necessary. Many SFAs are reporting difficulty sourcing packaging for the meals. The unitized meal waiver, if granted, would alleviate some packaging sourcing concerns.

The AOE's approach throughout has been to offer the maximum amount of flexibility allowed under federal regulations. The AOE has requested [many waivers](#) to reduce the regulatory burden on programs during this time, and will continue to submit additional waivers as the necessity becomes apparent. The early requirement through executive order that public schools consider and identify ways to feed their students during the closure has meant that Vermont is far ahead of other states in serving all of the children who rely on these programs. We are hearing of significant declines in meals counts in neighboring states. While we don't have meal counts for this time period yet, the major food service distributor reported that they sold 600 more cases of milk (50 servings/case) to schools during the week of 3/23 than in an average week prior to the closure.