

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

Continuity of Operations (COOP) Planning for Education Agencies:

Ensuring Continuity of Feeding and Food Distribution During Prolonged Absences, Dismissals, and Closures

COOP PLANNING – AN OVERVIEW

For schools, COOP planning means preparing to support the whole school community in the event of **short- and long-term student and staff absences, school dismissals, and/or school closures**. The COOP plan — contained in what is known as an “annex” within a school emergency operations plan (EOP) — will describe how a school or district will work to provide for the **continuation of essential services during prolonged absences caused by emergencies** (e.g., an infectious disease outbreak, natural disaster, or power outage). A critical component of a school system’s COOP planning is the continuation of feeding and food distribution in response to planned and unplanned disruptions for individual students, staff, and the whole school community. Examples of disruptions include prolonged individual absences and broader school dismissals and school closures.

As outlined in the [Guide for Developing High-Quality School Emergency Operations Plan \(School Guide\)](#), the [COOP Annex](#) aligns and is integrated with the EOP, and the goal of a COOP Annex is to help the school do the following:

- Promote health and safety;
- Outline mitigation strategies that aim to “[eliminate or reduce the loss of life and property damage by lessening the impact of an event or emergency](#)”; and
- Strive to maintain mission-oriented activities, including feeding and food distribution for the whole school community in the context of **day-to-day operational disruptions**.

Effective COOP planning for schools is done in collaboration with community partners, since school systems often play key roles in community preparedness plans, especially response and recovery initiatives. As a part of coronavirus disease 2019 (COVID-19)¹ planning, it is recommended that school planning teams create or update their COOP annexes.

As education agencies across the country work in collaboration with their community partners to provide essential support and mass care services in response to the COVID-19 pandemic,

¹ According to the U.S. Centers for Disease Control and Prevention (CDC), this novel coronavirus is named “SARS-CoV-2,” while the disease it causes is named “coronavirus disease 2019”. (Available at <https://www.cdc.gov/coronavirus/2019-ncov/summary.html>, last accessed March 9, 2020.)



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Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

feeding and food distribution remains a top priority for the whole school community. There are a variety of challenges that schools and school districts face as they work to ensure COOP, while also following social distancing guidelines and taking steps to protect essential staff.

The U.S. Department of Education's (ED) Office of Safe and Supportive Schools and its Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center have identified various effective state models that consider alternative and adaptable distribution methods such as integration of traditional models, like use of the school bus, use of private community partners, and more. We have used those models and our research to identify common challenges, as well as a list of recommendations to support state education agencies (SEAs) and local education agencies (LEAs) as they work to ensure continuity of feeding and food distribution.

RECOMMENDATIONS TO SUPPORT CONTINUITY OF FEEDING AND FOOD DISTRIBUTION

The *School Guide*) and [The Role of Districts in Developing High-Quality School Emergency Operations Plans](#) — issued jointly by ED and the U.S. Departments of Justice, Homeland Security (DHS), and Health and Human Services — both recommend that goals, objectives, and courses of action specific to ensuring food safety and continuity of feeding and food distribution be included within functional annexes drafted for inclusion as a part of school EOPs. (Access an [online course](#) and [specialized training package](#) specific to the development of a general Food Contamination Annex via the REMS TA Center Website.)

The REMS TA Center recommends that SEAs and LEAs work in collaboration with their school nutrition coordinators, public health partners, and other key stakeholders to first create a planning and assessment tool that outlines a clear plan to adjust school nutrition programs in response to the COVID-19 pandemic. For support, we have outlined a list of recommendations that is not exhaustive but offers considerations for planning teams as they develop and revise school nutrition planning and assessment tools and Food Contamination Annexes as a part of overall EOP planning.

Continuity of Feeding and Food Distribution Action Items

The recommendations outlined on the following pages are designed to support those working on the SEA or LEA level, emergency management level, and school safety agency level as they work to develop and continually revise related school nutrition planning and assessment tools and Food Contamination Annexes as a part of a comprehensive EOP and overall emergency management planning. It is important to remember that access to location-specific, accurate,



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Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

and timely information will provide further support in adjusting policies and procedures to ensure protection, prevention, mitigation, response, and recovery around this topic.

- ✓ **Create a plan to adjust school nutrition programs based on U.S. Department of Agriculture (USDA) authorizations, programs, and waivers.**
 - Local education authorities (such as school superintendents and school boards) have applied approaches from the USDA’s summer feeding programs and been “encouraged to ensure that the needs of low-income children are met during extended school dismissals.” (View a list of waivers on the last page of this fact sheet.)
 - Create a guidance document and checklists for school food sponsors and others responsible for implementing summer feeding programs and other programs under the USDA. (See a [Sample Flow Chart](#) and [Guidance Document](#) from the Wisconsin Department of Public Instruction.)
 - Work with neighboring institutions of higher education (IHEs), school districts, and other community partners to create collaborative feeding systems and/or to access financial support for rural, insular, and other schools that may not be eligible under Federal programs. (Learn about the [Emergency Meals-to-You \(eMTY\) program](#) that is administered by the USDA in collaboration with the Baylor University Collaborative on Hunger and Poverty.)
- ✓ **Design strategies to avoid food distribution in settings where people might gather in a group or crowd.**
 - **Walk-up, drive-thru, or curbside distribution.** Offer “grab-and-go” bagged lunches and meals via pick-up at designated distribution centers. SEAs and LEAs may also consider drive-thru or curbside distribution methods based on the availability of personal protective equipment (PPE) and recommendations from local public health partners. Some school districts are creating systems that allow community members to place online orders for pick-up via walk-up, drive thru, or curbside distribution. (See how Grand Islands Public Schools in Nebraska [share sample images of what meal bags look like and contain](#) via their Website.) Consider also including recommendations to safely clean food once families and caregivers arrive home on Websites, social media profiles, and more.
 - **Mobile or bus route delivery.** Deliver meals to centralized locations using a school bus and/or school van. Some states are opting to lift bidding requirements for school districts that do not own or operate their own buses to ensure they can easily contract private support for the distribution of school meals.
 - **Direct home delivery.** In some localities, direct delivery to homes may be a better option based on a variety of factors, including local transmission rates and guidelines around social distancing that require stay-at-home orders, as well as proximity of

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

- students and families to designated distribution centers and their access to personal and public transportation to those sites.
- ✓ **Determine what supplemental resources, tools, and services may be required to ensure the seamless and safe operation of feeding and food distribution sites.**
 - Develop a Web page on the SEA and/or LEA site that offers key information for staff and families, including information on where distribution centers are located, the USDA [National School Lunch Program \(NSLP\)](#) application requirements, general safety guidelines around feeding and distribution, and more. Processes and programs may vary from school district to school district, so it is important to provide information that is as local as possible. (See how the Georgia Department of Education created individual [pages for each school district](#), while the Pennsylvania Department of Education provides information based on [school county](#).) Many states have also created [interactive meal-finder applications](#) that provide GPS-based information on feeding programs hosted by SEAs, LEAs, and other community partners.
 - Hire security staff to work at distribution centers to help ensure that social distancing guidelines remain in place and are followed by staff and visitors. Existing essential staff may also be recruited to serve in this role if funding is not available to hire security staff.
 - Offer extended pick-up times and adjusted schedules to accommodate the whole school community, including students with parents or caregivers who are serving as essential workers in their locality.
 - ✓ **Consult with local health officials to determine strategies for modifying food service offerings to the whole community.**
 - Work with local health officials to determine strategies for providing meals to residents with COVID-19 or who are being monitored because of contact with persons with COVID-19.
 - Ensure that school nutrition and school safety/security/emergency management representatives from the SEA are a part of the state Emergency Operations Center.
 - Stay on top of industry news and trends to ensure that your team has the latest information to support modifications to food service offerings.
 - Federal agency partners are updating their news pages daily with new press releases to share information with school partners and others.
 - Visit the REMS TA Center [Home page](#), [Coronavirus Web page](#), and follow us on [Twitter](#) to get daily updates. The [School Nutrition Association \(SNA\) SmartBrief](#) provides a daily snapshot of school nutrition–related news.
 - ✓ **Ensure any staff hired to support food services receive necessary training to protect themselves and those they serve from the spread of COVID-19.**

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

- Work with your local and state partners to develop and revise training to ensure essential staff members supporting this essential service understand not only their role but also the importance of protective, preventative, and mitigative measures.
- Consult Federal partners' resources for support as well. The USDA worked in collaboration with the Institute of Child Nutrition to develop a [COVID-19 resources page](#), which includes links to resources that address how to safely distribute food to meet social distancing guidelines. The REMS TA Center has created a suite of resources specific to food safety, including an [online course](#), [specialized training package](#), [publication](#), and [Community of Practice \(CoP\) Forum](#). These resources include Webinars with state and Federal partners on this topic, including a 2020 Webinar on [Ensuring Feeding and Food Distribution During COVID-19](#) and a 2018 Webinar on [Food Safety and Emergencies](#). We also recommend that you read the [Supporting Schools in Creating Plans to Ensure and Sustain Food Safety](#), an ED Homeroom Blog post that features a REMS TA Center interview with leaders from ED and the USDA.
- ✓ **Lead a messaging campaign about the importance of the child nutrition program as an essential service in order to create pressure to get staff, supplies, and the like that are needed.**
 - Change marquees and signs in front of schools to say “thank you” to school nutrition staff and volunteers in order to keep them motivated.
 - Create hashtag campaigns via social media to promote information-sharing and to build the resilience of essential staff. (The Georgia Department of Education created the [#KeepGAFed hashtag](#) to encourage LEAs to post about efforts to provide meals to students.)
- ✓ **Use School Resource Officers (SROs) as essential support staff who provide cross-cutting functions.**
 - Hire SROs to join transportation staff during the delivery of meals, and train them to conduct welfare checks on families as a part of that process.
 - Create a system that allows staff and families to safely exchange instructional materials while also delivering meals.
- ✓ **Conduct recurring meetings with key partners on the topic of mass feeding to measure growth and changes over time.**
 - Include public health partners, school administrators, school safety staff, school nutrition staff, school transportation staff, the state superintendent and school district superintendents, and others who will play a key role in providing support, when possible, as this will help maximize whole school community access to meals and prevent duplication of services.

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

- Conduct Webinars and other required trainings in virtual formats. This may require that SEAs work now to transfer existing live trainings to virtual formats.
- ✓ **Work with your human resources department and school nutrition program partners to determine whether it is necessary to develop guidelines that ensure whole school community integrity as a part of the food distribution process.**
 - Determine whether parents and caregivers will be required to show documentation; if they are, provide multiple options to ensure accessibility. (For example, a student ID card could be sufficient in the event a parent or caregiver does not have a state-issued identification card.)
 - Consider creating codes to supplement phone and online meal orders and pick-up services.
 - Create signage individual schools can duplicate that details information about the age requirements for meal distribution.
- ✓ **Create a contingency plan in the event essential staff supporting feeding and food distribution test positive and/or a distribution center has to be shut down.**
 - This is where work and cultivated relationships with community partners is so important. It is never too late to develop agreements with neighboring school districts and IHEs, community organizations, and private vendors who can provide additional capacity support in this area. Memoranda of Understanding and Agreement, as well as Mutual Aid Agreements, are great tools that can be used to create clear parameters and to ensure that mitigative measures are in place. Learn more about agreements via the REMS TA Center's [Developing and Enhancing Memoranda of Understanding \(MOUs\) With Your Community Partners Specialized Training Package](#).
- ✓ **Sustain school nutrition programs for as long as possible.**
 - Work with the whole community (including community partners) to create a long-term plan to ensure that kids get fed, particularly in cases where localities cannot continue operating their school nutrition programs.
 - Schools in rural communities and in other school communities where staff and community capacity levels are typically low are experiencing extreme fatigue, and SEAs should consider how increased capacity can be supplemented with support from state, local, and community partners.

Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

COMMON CHALLENGES IDENTIFIED BY STATE PARTNERS

The number of children who now qualify for free or reduced-price school meals in your state and locality may increase due to the economic impact COVID-19 is having on families across the country. In many instances, there is fear among essential staff, including school nutrition and transportation staff, and others stepping in to fill capacity gaps. As a result, school systems are struggling to build a sense of safety or put in place effective safety measures. Find a list of some of the common challenges identified by state partners below.

- **Screening Essential Staff.** SEAs and LEAs have questions regarding how to screen essential staff who play a key role in ensuring continuity of feeding and food distribution. Also, in some school districts, a large majority of essential staff fall into the age group at high risk for exposure to and vulnerabilities resulting from COVID-19 infection.
- **Redesigning Food Distribution Methods.** There is a need to continually redesign food distribution methods, which is traditionally done in a centralized fashion (families going to the school or a distribution center in the community), as workers and families feel unsafe based on social distancing guidelines and stay-at-home orders.
- **Adjusting Food Preparation Methods.** Schools are concerned about whether there is a need to adjust food preparation methods and ensure access to PPE (e.g., masks, gloves, protective glass/plastic screens) to prevent contamination and exposure to COVID-19.
- **Understanding Federal Programs and Waivers.** SEAs and LEAs have questions about the availability of Federal waivers that they can obtain as they work to integrate the use of existing programs and grant activities that support capacity building on various levels.
- **Ensuring Compliance with Local, State, and Federal Programs.** SEAs and LEAs are working to develop and to integrate the use of existing systems that can support them in tracking expenditures, purchases, and activities conducted to ensure COOP in response to COVID-19 as they work to ensure compliance with Federal, state, and local grant programs.

FEDERAL RESOURCES TO SUPPORT CONTINUITY OF FEEDING AND FOOD DISTRIBUTION

A countrywide situational assessment has taught us that the intensity of transmission rates varies according to geographic location, which is why coordination with state and local public health officials and other community partners is so vital. However, the Federal government has released a variety of resources to support critical workers and schools in understanding the exposure risk to COVID-19 and in developing new standard operating procedures to work to protect the whole school community. Research from the CDC tells us that the risk of an



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Preparing for and Responding to COVID-19

employee transmitting COVID-19 to another is dependent on distance between employees, the duration of the exposure, and the effectiveness of employee hygiene practices and sanitation. Social distancing by itself cannot prevent the spread of the virus. Effective hygiene practices are extremely critical in all settings, but particularly food facilities, where frequent and proper hand-washing and routine cleaning of all surfaces is already a standard.

Resources for Food Nutrition Staff

The USDA notes that food safety practices under normal operations and emergency operations should remain the same. Through their Food and Nutrition Services (FNS), the USDA offers a variety of food safety resources as provided below:

- For schools and child care in general: <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/index.html>.
- For critical workers, including food workers: <https://www.cdc.gov/coronavirus/2019-ncov/community/critical-workers/implementing-safety-practices.html>.
- General food safety resources: <https://www.fns.usda.gov/ofs/food-safety-resources>.

The U.S. Food and Drug Administration recommends that food production/processing facilities conduct an evaluation to identify and implement changes to practices and operations that work to increase employee separation, as social distancing to the full 6 feet may not always be possible in some food facilities. Along with their general [Food Safety and Coronavirus Web Page](#), they offer the following resources that can support SEAs and LEAs with this topic:

- [Best Practices on Safe Food Handling and Employee Health in Retail Food Settings During COVID-19 Pandemic](#) addresses key considerations for how foods offered at retail can be prepared safely and delivered to the public, as well as key best practices for employee health and personal hygiene, cleaning, and sanitizing.
- [Summary of Best Practices for Retail Food Stores, Restaurants, and Food Pick-Up/Delivery Services During the COVID-19 Pandemic](#) offers at-a-glance information on how to Be Healthy, Be Clean; Clean & Disinfect; Social Distance; and Pick-Up & Delivery.
- [What You Need to Know: Food and COVID-19](#) is a public service announcement about food safety and supply for people and animals during COVID-19.

Federal Authorizations and Programs

The Federal government has authorized the use of a variety of programs, waivers, and flexibilities to support SEAs and LEAs, in collaboration with community partners, with their efforts to ensure continuity of feeding and food distribution. While the USDA administers the NSLP and related food safety, security, and emergency management programs, ED and USDA



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Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

have a long history of collaborating, because SEAs, LEAs, and their school communities are grantees and beneficiaries. While both agencies share a common goal of facilitating the safe and healthy development of children and youth across school communities and the communities they serve, the agencies and their many offices work together on a number of topics to help keep school communities safe and healthy before, during, and after possible emergencies.

During emergencies, these collaborations are further enhanced by additional, inter-related, Federal collaboration and consideration, because schools are a focal point within the community as well as a key service for the community. For example, the CDC has continually issued guidance developed in collaboration with ED to support education agencies and their partners. The DHS Cybersecurity and Infrastructure Security Agency issued guidance, [Identifying Critical Infrastructure During COVID-19](#), to support state, local, and industry partners in identifying the critical infrastructure sectors and the essential workers. Thus, “promoting the ability of such workers to continue to work during periods of community restriction, access management, social distancing, or closure orders/directives is crucial to community resilience and continuity of essential functions.” Both food assistance employees and educators are identified as essential service providers. The Federal Emergency Management Agency (FEMA) leads the coordination and collaboration initiatives for emergency services and related functions, such as Mass Care, which addresses food services.

In April 2020, ED announced the creation of an Elementary and Secondary School Emergency Relief Fund (ESSER Fund) through the Coronavirus Aid, Relief, and Economic Security (CARES) Act to support continuity of teaching and learning for K-12 education agencies disrupted by COVID-19. ESSER funding is available specifically to SEAs and LEAs, and leaders will be allowed flexible use of funding to support their immediate and longer-term needs. Through the CARES Act, an additional \$8.8 billion has been authorized for child nutrition programs to cover COVID-19 associated costs. This is available through September 30, 2021. School districts may use a portion of their funds to determine how to provide meals to eligible students.

USDA Child Nutrition Programs

The USDA has been instrumental in facilitating this process for SEAs and LEAs as they have issued multiple waivers addressing the many inter-related processes and characteristics of this type of initiative. Since the outset of the COVID-19 outbreak, the USDA has provided states with broad flexibilities to ensure the continuation of meal service during COVID-19–related school closures. The USDA is committed to using all the options available to us to help people get the food they need. Through its FNS, they are using the programs outlined below to serve program participants countrywide. To learn more about FNS and their response to COVID-19,



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Preparing for and Responding to COVID-19

visit www.fns.usda.gov/coronavirus and follow them on Twitter at [@USDANutrition](https://twitter.com/USDANutrition). Resources on their site are outlined by state.

- [Unexpected School Closures](#): In the early days of the pandemic response, FNS provided guidance and flexibility regarding where and how school meals could be served during closures.
- [Pandemic EBT](#): FNS is allowing states to provide benefits (like the Supplemental Nutrition Assistance Program or “food stamps”) to children who normally receive free or reduced-price school meals.
- [Nationwide Meal Times Waiver](#): FNS has provided waivers to education agencies to allow meals to be served to kids outside traditional times to maximize flexibility for meal pick-up.
- [Nationwide Non-congregate Feeding Waiver](#): FNS is allowing meals to be served in non-group settings to support social distancing.
- [Nationwide Afterschool Activity Waiver](#): FNS paused requirements for enrichment activities to accompany afterschool meals and snacks.
- [Nationwide Meal Pattern Waiver](#): FNS is giving states the flexibility to serve meals that do not meet meal pattern requirements, when needed.
- [Nationwide Parent/Guardian Meal Pick-Up Waiver](#): FNS is allowing parents/guardians to pick-up meals and bring them home to their children.
- [Nationwide Community Eligibility Provision \(CEP\) Data Waiver](#): FNS is extending CEP election, notification, reporting, and deadlines for school year 2020–21.
- [Nationwide Waivers of Child Nutrition Monitoring](#): FNS extended certain administrative deadlines related to CEP because of school closures.

FEMA Public Assistance Grant Program

After a presidential emergency declaration, FEMA can assist applicants (state, local, and Tribal governments and certain Private Nonprofit entities) with response and recovery efforts. Generally, FEMA connects school systems with their state and local partners to begin the process prior to the school system submitting an application using the [Request for Public Assistance form](#) through its [FEMA Grants Portal](#) for expedited processing. As schools work with their emergency management partner, they discuss prospective projects to be formulated and consider allowable uses of funds, hastening the process and increasing the quality of support.

- Information on How to Apply for Public Assistance
 - [COVID-19 Pandemic: Public Assistance Simplified Application Fact Sheet](#)



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Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center

Preparing for and Responding to COVID-19

- Guidance on COVID-19 Activities Eligible for Public Assistance Reimbursement
 - [COVID-19 Pandemic: Eligible Emergency Protective Measures Fact Sheet](#)
 - On April 11, 2020, FEMA [issued a new policy](#) that addresses the purchase and distribution of food eligible for Public Assistance funding under emergency and major disaster declarations for the COVID-19 pandemic.