

March 15, 2021

Secretary Miguel Cardona
U.S. Department of Education
400 Maryland Avenue SW
Washington, DC 20202

RE: Recommendations for the second volume of the ED COVID-19 Handbook

Dear Secretary Cardona:

We, the undersigned organizations, commend the U.S. Department of Education (ED) for identifying school nutrition, regardless of the educational setting, as a key strategy for addressing the extraordinary disruption to children's health, educational, and emotional wellbeing that has been a result of the pandemic.

The meals provided during the school day and during the out-of-school time hours have always been a vital source of support for families from low-income backgrounds, and are even more critical as the pandemic has increased the number of families facing hunger. As we know, students from low-income backgrounds and students of color have been disproportionately impacted by COVID-19 and were more likely to experience food insecurity or live in a food desert prior to the onset of the pandemic. Therefore, school nutrition will serve not only as an important lever for increasing and sustaining student engagement during this time, but also a critical, long-standing opportunity to increase education equity.

As students begin to safely return to the classroom and to afterschool and summer programs, it is essential that schools maximize participation in the school and out-of-school time meal programs to ensure children have the nutrition they need to thrive. To that end, we make the following recommendations for your consideration:

Ensure Access to School Breakfast

Research shows that the School Breakfast Program is essential to combatting childhood hunger and supporting children's health, learning, and development. COVID-19 has drastically impacted participation in this important program: in April 2020, the first full month of the pandemic, 50 million fewer breakfasts were served and 396,000 fewer children were reached compared to April 2019.

The best practices that have been driving increased participation during normal times — offering breakfast at no charge to all students and serving meals through breakfast after the bell service models — continue to be important during the pandemic as schools have been able to offer free breakfast and lunch at no charge to all students through the Summer Nutrition Programs, and breakfast in the classroom can help support social distancing as school buildings have reopened.

We ask that the new handbook encourages schools to utilize models which move breakfast out of the cafeteria as a strategy to increase participation while also supporting ongoing social distancing best practices. Suggested language below:

- **Increase Participation by Moving Breakfast After the Bell**
As students begin to return to in-classroom instruction, it is critical to consider what changes schools can make to their school meal operations to protect students and staff while also expanding access to school breakfast. Schools can use innovative delivery models, such

as delivering breakfast (and lunch) to the classroom and “grab and go,” to serve breakfasts and lunches to students during this time. These service models make participation convenient by taking meals out of the cafeteria and serving it in places where children can easily access the meal, such as in classrooms or hallway kiosks. They also can help limit the extent that students mix with each other and with students from other classes or grades.

Schools should consider the implementation of the following models to safely and effectively distribute meals during COVID-19:

- **Breakfast in the Classroom (BIC):** School nutrition staff packs breakfasts into coolers or insulated bags to be transported to each classroom by school nutrition staff, designated students, or volunteers.
- **Grab and Go:** School nutrition staff packs breakfast meals in bags to be picked up from the cafeteria or kiosks in the hallway on the way to class. “Grab and go” is a great option for schools that may find it difficult to deliver meals directly to the classroom or that prefer food service staff to manage the counting and claiming of meals.

Resources

- [Use Innovative Delivery Service Models to Serve Meals as Schools Reopen](#)
- [Making Breakfast Part of the School Day](#)
- [Partners for Breakfast in the Classroom - Dining Guide for Meals in the Classroom](#)

Incorporate Meals into Summer and Afterschool Programs

Out-of-school time programming was hit hard by COVID-related closures. These programs will be critical to overcoming the unfinished instruction experienced by far too many children and disproportionately impacting children who are low-income, Black and Latinx. As school-based summer and afterschool programs begin to slowly reopen and increase capacity, it is critical that these programs consider providing meals through the Summer and Afterschool Nutrition Programs if not already doing so. The meals provided through the Summer and Afterschool Nutrition Programs can help draw more students into afterschool and summer programs that keep them safe, learning, and well-nourished in the hours after the school day has ended and during the summer months. The significant new funding for afterschool and summer programming in the American Rescue Plan Act of 2021 also provides an important opportunity to link meals with new federally funded out-of-school time programs.

We recommend that the new handbook encourages schools to connect all summer and afterschool programs, clubs, and activities to the Summer and Afterschool Nutrition Programs. Suggested language below:

- **Link All Afterschool and Summer Programs to Federally Funded Meals**
The Afterschool and Summer Nutrition Programs provide funding to serve meals to children alongside educational and enrichment programming, helping to reduce childhood hunger in low-income communities and support the establishment and sustainability of afterschool and summer programs. As schools begin to reopen out-of-school time programs, school nutrition departments should consider implementing the Summer and Afterschool Nutrition Programs to better support students while also increasing the amount of federal child nutrition funding supporting the school district.

Resources

- [The Afterschool Meal Program Fact Sheet](#)
- [The Summer Meal Program Fact Sheet](#)

Maximize USDA Nationwide Waivers and Flexibilities

To support access to school meals during the pandemic, the U.S. Department of Agriculture (USDA) issued in March 2020 — and has since extended through September 30, 2021 — key nationwide waivers which allow for meals to be served safely during the pandemic, including allowing meals to be served through the Summer Nutrition Programs in place of the traditional school meals programs; allowing meals to be taken home and for parents or guardians to pick up meals for their children; and for multiple days' worth of meals to be distributed at one time. In addition, USDA waived the requirement that summer and afterschool meal sites must be located in an area in which at least half of the children are eligible for free or reduced-price school meals. This allows schools to offer breakfast, lunch, supper, and snack to all children at no charge.

We recommend that the guidance encourages schools to evaluate current operations and adjust as needed to fully utilize the waivers and flexibilities currently available. Suggested language below:

- **Maximize USDA Nationwide Waivers and Flexibilities**
As a result of extended nationwide waivers, school districts have new opportunities to adapt and adjust operations to provide meals to children in a variety of ways that minimize contact. Schools should connect with their state child nutrition agency to plan for summer 2021 operations as well as determine if they can make additional changes to their meal service operations to support greater access to nutritious meals. These may include:
 - Providing meals on weekends and over school holidays;
 - Serving multiple days' worth of meals at one time that families are able to take home;
 - Operating in areas that might not have been eligible before COVID-19;
 - Expanding the number sites providing meals; and
 - Addressing transportation barriers for children who are learning remotely by delivering meals to children houses or utilizing existing bus routes to distribute meals.

Resources

- [USDA Child Nutrition Waivers](#)
- [Serving Meals on Weekends and Holidays During COVID-19](#)
- [Providing Multiple Meals at a Time During the Coronavirus \(COVID-19\) Pandemic](#)
- [Feeding Kids When School Is Closed](#)

Thank you for the opportunity to share our thoughts, recommended language, and supporting resources for the second volume of the ED COVID-19 Handbook.

Sincerely,

Food Research and Action Center (FRAC)
The Education Trust
Share Our Strength
Education Reform Now