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COVID-19 Response: Feeding Mississippi Children During School Closure

April 20, 2020

Across the country, states have needed to use school closures and remote learning as strategies for reducing the spread of COVID-19. On April 14, 2020, Mississippi leaders announced that children would stay home from their school facilities for the rest of the academic year.¹ Extended school closures make it difficult to meet children's nutritional needs: students who rely on free and reduced-price meals from the National School Lunch Program (NSLP) and School Breakfast Program (SBP) lose their best source of daily nutrition. About 74% of Mississippi public school students qualify for free or reduced-price meals;² the change could thus negatively impact over 344,000 school-age children and their families.³

There are, however, ways for policymakers, schools, and community organizations to ensure that Mississippi children's nutritional needs are met during this time. This fact sheet outlines opportunities to ensure the availability of adequate meals for low-income children in Mississippi.

Pandemic EBT (P-EBT)

Pandemic EBT (P-EBT), or P-SNAP, authorizes states during pandemics to issue Supplemental Nutrition Assistance Program (SNAP) EBT cards with the value of school breakfast and lunch reimbursements to households whose children would have received free or reduced-priced school meals at school.⁴ P-EBT thus provides families with additional funds to buy nutritious food for their children, avoiding the complications of operating school meal service sites or arranging for delivery of school meals.

In order to participate in P-EBT, states must elect to participate in the program and submit plans to USDA for approval. USDA has issued guidance on state plans.⁵ Several states, including North Carolina, have already been approved for P-EBT during the COVID-19 pandemic.⁶ At the time of this document's writing, Mississippi has not submitted a state plan for P-EBT, and the Mississippi Department of Human Services (MDHS) website does not indicate an intention to do so. By not taking advantage of P-EBT, Mississippi is missing an opportunity to efficiently provide nutrition assistance to the families without easy access to school-meal sites.

- **Mississippi, through MDHS, should opt to participate in P-EBT and submit a state plan to the Food and Nutrition Service of USDA as soon as possible.**

Summer Food Service Program (SFSP)

The Mississippi Department of Education (MDE) Office of Child Nutrition (OCN) oversees NSLP and SBP in Mississippi.⁷ In response to school closures, OCN received approval from USDA to allow Mississippi schools to register to operate the Summer Food Service Program (SFSP), in which meals may be served to students by

school food providers, non-profit organizations, and community organizations.⁸ All schools in Mississippi are eligible, but not required, to serve meals through SFSP during COVID-19 closures.⁹

Although the program is usually limited to school-sites with at least 50% of students enrolled in free or reduced-price lunch, Mississippi received a waiver to administer the program in other schools as well.¹⁰ A school with less than 50% of students enrolled in free or reduced-price lunch must receive approval from OCN to operate this program and must target economically disadvantaged children in its distribution plan.¹¹ Only schools are authorized to operate SFSP under this waiver; other types of sponsor organizations (e.g., non-profits) are limited to serving areas that meet the 50% enrollment threshold.

- **Families can find meal sites on the website www.schoolmealfinder.com or by texting “FOOD” or “COMIDA” to 877-877. OCN also keeps a list of schools serving meals on its website: www.mdek12.org/OCN.**
- **Schools should apply to OCN to provide food to Mississippi children through SFSP during the COVID-19 closures.¹²**

Seamless Summer Option (SSO)

In the summer, schools may generally choose to participate in either SFSP or the Seamless Summer Option (SSO).¹³ SSO offers schools that participate in NSLP during the school year a “streamlined approach” with reduced paperwork for the summer by using the same meal service rules and regulations as NSLP.¹⁴ Unlike SFSP, SSO may only be administered by schools that already run NSLP and/or SBP during the year and not by non-profits or other community organizations.¹⁵ Although other states have done so,¹⁶ Mississippi OCN did not activate the Seamless Summer Option for MS schools and has instead restricted schools to using SFSP because the meal reimbursement rates are higher.¹⁷

Despite SFSP’s advantages, schools may find it easier to transition to SSO due to its similarity to NSLP. The extra administrative burdens of SFSP could be discouraging schools from running meal-service programs, thus leaving some families without a local option for feeding their children.

- **To reach more children across the state, OCN should authorize schools to participate in the Seamless Summer Option during COVID-19 closures.**

Meal Delivery

Schools operating a meal service during COVID-19 can, in addition to providing grab-and-go meals, offer delivery to students’ homes.¹⁸ In either situation, schools can provide up to two meals a day and distribute a week’s worth of meals at a time, with OCN approval.¹⁹ Schools may deliver to children who are in “area eligible” locations (an area where at least 50% of the children are eligible for free or reduced-price meals) or who are individually deemed eligible for free or reduced-price meals.²⁰ Only school food authority sponsors can apply to administer this delivery option due to confidentiality concerns.²¹ Schools may contract with outside organizations to provide delivery services, but must receive written consent from a recipient household before sharing any contact information and, in the case of a private vendor, enter into a memorandum of understanding regarding the confidentiality requirements.²²

OCN has released guidance providing that schools can use delivery models other than grab-and-go for their SFSP programs, as long as those schools fill out an additional form along with their SFSP participation application.²³ Schools may use private vehicles or coordinate with their Local Educational Agency to use school buses to deliver home meals.²⁴ Unfortunately, transportation costs are largely non-reimbursable with SFSP funds.²⁵

- **School Food Authorities should apply to OCN to implement home delivery as part of their SFSP operations.**

- **Community organizations and private donors should support meal-delivery services through volunteers, resources, and additional funds.**

Some Mississippi school districts may also be eligible to participate in the new Emergency Meals-to-You (EMTY) program. EMTY is a collaboration between Baylor University and USDA that provides weekday breakfasts and lunches to students who are eligible for free or reduced-price meals but cannot receive those meals due to emergency school closures.²⁶ EMTY mails 10 shelf-stable breakfasts and lunches every two weeks directly to students' homes while schools are closed due to COVID-19.

School districts must apply and be accepted into the EMTY program before individual families can enroll. EMTY is available to all states,²⁷ but Mississippi school districts have not yet utilized the program.²⁸ To participate, a school district must participate in NSLP, have at least 50% of their students eligible for free or reduced-price meals, have announced closure of at least four weeks, and be designated as "rural" by USDA.²⁹ School districts must fill out an online application on the Meals-to-You Website and email their application OCN.³⁰

- **Eligible Mississippi school districts should immediately apply for the EMTY program so their students can enroll and have these meals delivered to their homes.**
- **OCN should provide an agency point of contact to help facilitate and coordinate EMTY applications for Mississippi school districts.**³¹

Parent Pick-up

Because it may be unsafe or impractical to bring children along with parents to pick up school meals at SFSP sites, during COVID-19 states may allow parents to pick up meals without their children present.³² Mississippi is permitting SFSP sites to use this option if they first submit an implementation plan and receive approval from OCN.³³ OCN has released a sample plan that school districts can modify and submit.³⁴ Implementing parent pick-up will increase the feasibility of using the SFSP grab-and-go meal distribution model, and thus encourage greater participation in SFSP.

- **School districts and other SFSP sponsor organizations should use OCN's sample plan to develop their own parent pick-up program plan to submit to OCN for approval.**

Additional Resources

- **Schools can apply for GENYOUth's "COVID-19 Emergency School Nutrition Funding" program to receive a grant of up to \$3000 to support expenses for meal distribution and delivery during COVID-19: covid-19.genyouthnow.org.**
- **The USDA Food and Nutrition Service website "FNS Response to COVID-19" provides up-to-date guidance on available programs and waivers for Child Nutrition Programs: fns.usda.gov/disaster/pandemic/covid-19.**
- **The organization No Kid Hungry is providing emergency grant funding and additional resources to support schools and community groups feeding children out of school: nokidhungry.org/coronavirus.**

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ENDNOTES

- ¹ See *Updates and Information in Response to COVID-19 (Coronavirus)*, MISS. DEP'T OF EDUC. (last visited Apr. 19, 2020), <https://www.mdek12.org/COVID19>.
- ² See Kayleigh Skinner et al., *Interactive Map: With School Closures, Where Can Children Eat for Free?*, MISS. TODAY (Mar. 24, 2020), <https://mississippitoday.org/2020/03/24/interactive-map-with-school-closures-where-can-children-eat-for-free/>.
- ³ Estimate based on free and reduced-price lunch qualification rate multiplied by total pre-k-12 enrollment. See *Enrollment by Grade, 2019-2020*, MISS. DEP'T OF EDUC. (last visited Apr. 20, 2020), <https://newreports.mdek12.org/>.
- ⁴ Families First Coronavirus Response Act, P.L. 116-127 (2020) § 1101
- ⁵ U.S. DEP'T OF AGRIC. FOOD & NUTRITION SERV., STATE PLAN FOR PANDEMIC EBT (P-EBT) (Mar. 20, 2020), <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAP-CN-COVID-PEBTGuidance.pdf>.
- ⁶ See *State Guidance on Coronavirus Pandemic EBT (P-EBT)*, U.S. DEP'T OF AGRIC. FOOD & NUTRITION SERV. (last visited Apr. 19, 2020), <https://www.fns.usda.gov/snap/state-guidance-coronavirus-pandemic-ebt-pebt>.
- ⁷ See *Child Nutrition*, MISS. DEP'T OF EDUC. (last visited Apr. 16, 2020), <https://www.mdek12.org/OCN>.
- ⁸ See Scott Clements, *Coronavirus School Closure Meals Announcement*, MISS. DEP'T OF EDUC. (Mar. 14, 2020), <https://www.mdek12.org/sites/default/files/documents/OCN/covid-19-school-closures-meal-announcement-03142020.pdf>.
- ⁹ *School Nutrition Program Meal Service during Coronavirus (COVID-19) Unanticipated School Closures Question and Answers*, MISS. DEP'T OF EDUC (last visited Apr. 19, 2020) [hereinafter OCN Q&A], https://www.mdek12.org/sites/default/files/documents/OCN/ocn_covid_q-a_2.pdf.
- ¹⁰ See *Child Nutrition Program State Waiver Request – Area Eligibility Pursuant to 7 CFR 225.2, 225.6, and 225.14*, U.S. DEP'T OF AGRIC. (Mar. 28, 2020), <https://fns-prod.azureedge.net/sites/default/files/resource-files/MS-CN-COV-AreaEligibility-Approval.pdf>.
- ¹¹ See OCN Q&A, *supra* note 9.
- ¹² See *Summer Food Service Program Application Instructions*, MISS. DEP'T OF EDUC. (updated Apr. 19, 2020), <https://www.mdek12.org/sites/default/files/documents/OCN/site-applications-complete-r3302020-f.pdf>.
- ¹³ See *An Opportunity for Schools*, U.S. DEP'T OF AGRIC. (last visited Apr. 19, 2020), <https://www.fns.usda.gov/school-meals/opportunity-schools>.
- ¹⁴ See *id.*; see also *Seamless Summer Option (SSO)*, CA. DEP'T OF AGRIC. (last visited Apr. 19, 2020), <https://www.cde.ca.gov/ls/nu/sn/ssfo.asp>.
- ¹⁵ See *Comparison of Programs SFSP/NSLP/Seamless Option*, U.S. DEP'T OF AGRIC. (Jan. 22, 2015), https://fns-prod.azureedge.net/sites/default/files/SFSP_SeamlessComparisonChart.pdf
- ¹⁶ See, e.g., *Area Eligibility Waiver Approval (Delaware)*, U.S. DEP'T OF AGRIC. (Apr. 6, 2020), <https://fns-prod.azureedge.net/sites/default/files/resource-files/DE-CN-COV-AreaEligibility-Approval.pdf>; see also *Area Eligibility Waiver Approval (California)*, U.S. DEP'T OF AGRIC. (Mar. 30, 2020), <https://fns-prod.azureedge.net/sites/default/files/resource-files/CA-CN-COV-AreaEligibility-Approval.pdf>.
- ¹⁷ See Scott Clements, *USDA Waivers, School Closures, and Child Nutrition Funding*, MISS. DEP'T OF EDUC. (Mar. 27, 2020), <https://www.mdek12.org/sites/default/files/documents/OCN/memo-sfsp-funding-during-school-closures-3272020.pdf>.
- ¹⁸ See *COVID-19 Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Meal Delivery Using Existing Authority*, U.S. DEP'T OF AGRIC. FOOD & NUTRITION SERV. (Mar. 17, 2020) [hereinafter Meal Delivery Using Existing Authority], <https://www.fns.usda.gov/sfsp/covid-19-meal-delivery>.
- ¹⁹ See *id.*; see also OCN Q&A, *supra* note 9.
- ²⁰ See Meal Delivery Using Existing Authority, *supra* note 18; see also 7 C.F.R. §225.2.
- ²¹ *Id.*
- ²² *Id.*
- ²³ See OCN Q&A, *supra* note 9.
- ²⁴ *Id.*
- ²⁵ *Id.*
- ²⁶ See *Emergency Meals-to-You Application*, MEALS TO YOU (last visited Apr. 16, 2020), <https://mealstoyou.org/emergency-meals-to-you-application/>; see also *Meals-to-You Frequently Asked Questions (FAQs)*, MEALS TO YOU (last visited Apr. 16, 2020), <https://mealstoyou.org/emtyfaqs/>.
- ²⁷ See *Information & Application for School Districts*, MEALS TO YOU (last visited Apr. 19, 2020), <https://mealstoyou.org/emergency-meals-to-you-school-districts/>.
- ²⁸ See *Emergency Meals-to-You School Districts*, MEALS TO YOU (last visited Apr. 19, 2020), <https://mealstoyou.org/emergency-meals-to-you-school-districts-2/>.
- ²⁹ See *Information & Application for School Districts*, *supra* note 27.
- ³⁰ See *id.*
- ³¹ See *id.*
- ³² See *COVID-19 Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children*, U.S. DEP'T OF AGRIC. (Apr. 14, 2020), <https://www.fns.usda.gov/cn/covid-19/parents-and-guardians-waiver>.
- ³³ See Scott Clements, *Implementing New Waivers Memo*, MISS. DEP'T. OF EDUC. (Apr. 13, 2020), <https://www.mdek12.org/sites/default/files/documents/OCN/implementing-new-waivers-patternflex-parentpickup-04132020-covid-19.pdf>.
- ³⁴ Scott Clements, *Parent Pick-Up Waiver Guidance*, MISS. DEP'T OF EDUC. (Apr. 16, 2020), <https://www.mdek12.org/sites/default/files/documents/OCN/parent-pick-up-waiver-guidance-04162020-memo.pdf>.