

HACCP-Based Standard Operating Procedure (SOP)

School Meal Service Procedures During a COVID-19 Pandemic

PURPOSE: To prepare for pandemic incidents involving child nutrition program staff and child nutrition program services.

SCOPE: This procedure should be implemented to safely and properly respond to pandemic incidents, some of which may involve school closures.

KEY WORDS: Pandemic, virus, infectious, school closures.

INFORMATIONAL PREFACE:

Viral illness can spread from person to person through small droplets from the nose or mouth which are spread when an infected person coughs or exhales. These droplets land on surfaces and can survive for hours and even days on some surfaces. The virus can be transferred to other people when they touch the contaminated surface, then touch their eyes, nose, or mouth. The virus can also be transferred when people breathe in droplets from a person with a viral infection who coughs, sneezes or exhales droplets.

When infection spreads rapidly in people across a very large region, it is considered a pandemic. Preventative measures may be taken on global, national, state, and local levels to protect public health and safety.

GENERAL INSTRUCTIONS:

Emergency preparedness is all about being ready to manage the unexpected and keep everyone safe.

During a viral pandemic...

1. Follow recommended guidance from the Centers for Disease Control for a viral pandemic. [What School Nutrition Professionals and Volunteers at Schools Need to Know about COVID-19²](#) and [CDC's Specific Considerations for Schools³](#).
2. Limit exposure to large groups of people. Use spacing strategies to create a six-foot distance between people. This could involve staff members working at different workstations. It could involve innovative meal delivery systems when providing meals to children.
3. Avoid one-on-one contact with individuals (hugs, handshakes, high fives, etc.).
4. Staff and students should stay home if they have a fever, tested positive for COVID-19, been in contact with someone diagnosed with COVID-19 or are showing other symptoms. Staff and students who have recently had close contact with a person with COVID-19 symptoms should stay home and monitor their health.
5. Utilize an [Employee Health Agreement SOP specific for COVID-19⁴](#) for documenting employees will follow recommended procedures for working only if in good health.
6. CDC's criteria can help inform when employees should return to work: [if they have been sick with COVID-19 and if they have recently had close contact with a person with COVID-19](#)
7. Consider conducting daily health checks (i.e. taking temperatures) on staff and students.

- Check employees daily for illness, including a screening for illness symptoms and the taking/recording of employee's temperature before their shift begins using an [employee health form](#)⁵.
- Employees who appear to be ill upon arrival to work or become sick during the day should be sent home immediately.
- Recommend scheduling employees to the same shift and not shifting employees between shifts to minimize spread in the event that an employee is diagnosed with COVID-19.
- Consider temporarily assigning employees at high risk for serious illness due to COVID-19 to duties that limit their exposure to the public. High risk refers to older adults, pregnant women, and those with compromised immune systems or underlying medical problems.
- Instruct staff, as much as possible, to keep a 6-foot distance between both themselves and customers.

Maintain a Healthy Work Environment

Institute measures to physically separate and increase distance between employees, volunteers, other coworkers, students, and their families, such as:

- Plan menus, production, and food preparation schedules to allow employees to maintain the recommended physical distance of 6 feet while working when possible.
 - Use tape to mark 6-foot workstations (boxes or stripes on the floor) in the kitchen, food service, and food delivery points where interactions with students or their families occur, if possible.
 - Place posters that encourage staying home when sick, cough and sneeze etiquette, and good hand hygiene in the school, at entrances, and where they are likely to be seen.
 - Provide employees with access to soap, clean running water, paper towels for drying their hands, and provide alcohol-based hand sanitizers containing at least 60% alcohol at stations around the establishment for use by both workers and customers.
 - Provide tissues and no-touch disposal receptacles for use by employees, volunteers and customers.
 - Clean, sanitize, and disinfect frequently touched surfaces often. If the surfaces are visibly dirty, clean them prior to disinfecting. To disinfect, use products that meet Environmental Protection Agency's (EPA) criteria for use against SARS-CoV-2^{external icon}, diluted household bleach solutions prepared according to the manufacturer's label for disinfection, or alcohol solutions with at least 70% alcohol, and are appropriate for the surface. Follow manufacturer's directions for use.
 - Conduct frequent cleaning of entrances, employee break rooms, rest areas, and other common areas, focusing on surfaces and objects that are touched by multiple people.
 - Provide disposable disinfectant wipes, cleaners, or sprays that are effective against SARS-CoV-2, the virus that causes COVID-19 and other viruses; so employees can wipe down frequently touched surfaces such as food service work areas in kitchens, cafeterias, door handles, tables, and countertops, and in outside distribution areas.
 - Follow all applicable local, state, and federal regulations and public health agency guidelines.
8. Maintain physical distancing during meal service or meal delivery. Utilize [signage \(sample signs on pages 36-52\)](#)⁶ in communicating physical distancing. Implement a plan for contactless delivery service such as:

Developed June 16, 2020, revised July 7, 2020

- a. Meals served on site should be placed on a counter or tray line for quick pick up.
 - b. Meals for curbside pick-up should be placed on a table to minimize person-to-person contact.
 - c. Limit social interactions to speed up service and minimize contact time.
9. Comply with all policies for reporting notifiable illnesses to administrative personnel and/or public health departments.
10. Cross-train program staff to perform essential activities in the event of key absences or emergency situations. Develop a back-up plan with community partners for serving meals if staff become sick.
11. Reinforce and closely monitor personal hygiene and hand hygiene practices.
- a. Wash hands properly and frequently. Many diseases and conditions are spread by not washing hands with soap and clean, running water. Refer to the [ICN's SOP on Washing Hands](#)⁷.
 - b. 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.
 - c. As a best practice, wear a disposable apron when handling or delivering foods.
 - d. Wear a [cloth face covering or mask](#)⁸ (not a medical personal protective equipment) when handling, preparing, serving, or delivering foods.
 - e. Strongly reinforce health and hygiene activities. Refer to the [ICN's Personal Hygiene SOP](#)⁹.
12. Avoid touching eyes, nose, or mouth. Follow appropriate coughing and sneezing etiquette. Cough or sneeze using a disposable tissue or elbow, followed by hand sanitizer or hand washing properly at all times.
13. Allow only program staff, custodial staff, and approved volunteers to enter program areas.
14. Routinely clean and disinfect **high-touch nonfood-contact surfaces**, such as door handles, light switches, phones, keyboards, tray slides, etc. Disinfecting works by using chemicals to kill germs on surfaces. Disinfectants are chemical products that destroy or inactivate germs. Refer to the [CDC Guidance for Cleaning and Disinfecting for public spaces, workplaces, businesses, schools and homes](#)¹⁰.
- a. Use properly diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and/or EPA-registered disinfectants.
 - b. Disinfecting solutions can be transferred to the spray bottle for easier application to areas that need to be disinfected.
 - c. Allow the disinfectant to remain in contact with the surface for the appropriate amount of time. Follow manufacturer's instructions for contact time.
 - d. Diluted household bleach disinfecting solutions can be used if appropriate for the surface. Prepare by mixing 1/3rd 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.
15. Clean and sanitize **food contact surfaces** before and after each use. Refer to the [ICN's SOP on Cleaning and Sanitizing Food Contact Surfaces](#)¹¹. [If using chlorine bleach, use a minimum of one teaspoon \(65 parts per million\) up to a maximum of one tablespoon \(200 parts per million\) chlorine bleach per gallon of water for sanitizing food contact surfaces](#)¹².
16. Handle program waste properly.
17. Discontinue use of share table options temporarily.
18. Discontinue self-service food bars and salad bars. [Refer to FDA guidance on self-service food buffets such as salad bars](#)¹³ – a summary of this resource is provided below:

As an extra precaution to help avoid the transmission of COVID-19 through surface contact, we recommend frequent washing and sanitizing of all food contact surfaces and utensils. Food-service workers also must practice frequent hand washing and glove changes before and after preparing food. Include frequent cleaning and sanitizing of counters and condiment containers. Consumers should wash their hands after using serving utensils. In communities with sustained transmission of COVID-19, state and local health authorities have implemented social-distancing measures which discourage or prohibit dining in congregate settings. *We also recommend discontinuing self-service buffets and salad bars until these measures are lifted.*

19. As part of overall emergency preparedness, appoint a Pandemic Coordinator, and maintain close communication with the local county sanitarian. Keep an updated contact list of key partners at the State and local levels.
20. Keep staff, customers, and other stakeholders informed with current and reliable information.
21. Work in cooperation with school administration and media to communicate importance of preventative measures, such as handwashing, for all school staff and students.

INSTRUCTIONS INVOLVING 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; the school board or the Governor. Since many children rely on school meals for proper nutrition, alternative meal program operations may be implemented. School Food Authorities (SFAs) are not required to serve meals when schools are closed for an emergency. USDA may offer meal program flexibilities which will be communicated to SFAs by Montana Office of Public Instruction School Nutrition Programs (MT OPI SNP).

1. Defer to Federal, State, and Local agency protocol and guidance during crisis situations. Agencies can assist when conditions disrupt the day-to-day routine on a large scale. Agencies can work with Sponsors in collaborative efforts to maintain a safe food supply and keep program staff safe.
2. MT OPI SNP will communicate availability of waivers for meal program flexibilities. If available and needed, apply for applicable waivers. Sponsors 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.
3. The USDA may allow for non-congregate meal service during a viral pandemic. SFAs will be notified by MT OPI SNP if this is an option. If allowed, plan for the use of **non-congregate meal service** during the emergency period. Utilize the [Emergency Meal Service Toolkit](#)¹⁴ from [LunchAssist](#)¹⁵
 - a. Determine service methods that can be used, such as grab and go, curbside pick-up, and/or meal delivery systems using bus routes or home delivery options.
 - b. Plan service locations. Meals may be served in unconventional places, such as parking lots, bus loops, multi-purpose rooms, libraries, parks, etc.
 - c. Determine meal accountability procedures. Meal count documentation and records must be maintained for meals served under USDA meal programs, including the Summer Food Service Program (SFSP) for unanticipated school closures.
 - d. Identify ways to communicate meal availability.
 - e. 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.

- f. Strongly reinforce that staff should cover their face with a cloth mask during preparation and service of meals.
 - g. Plan for proper hand hygiene for the type of service planned.
 - h. 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 with potable water, soap, paper towels, and a discard bucket. Employees should sanitize their hands regularly with hand sanitizer during the meal service period.
4. 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 must meet all meal pattern requirements for the designated program. If emergency conditions prevent a sponsor from obtaining a certain food product, such as milk, communicate the issue to MT OPI SNP.
5. Meals served must still comply with relevant civil rights requirements, including documented requests to accommodate children with special dietary needs. Communicate with families in need of special dietary accommodations to make plans for when and where they can obtain special meals.
6. Purchase and keep on hand sufficient quantities of...
 - a. Chemicals used to make a sanitizing solution
 - b. Disinfectant approved for use in a foodservice facility
 - c. Single-use food gloves in several sizes
 - d. Disposable service ware suitable for unconventional delivery systems
 - e. Shelf-stable foods
7. Communicate food safety rules as they apply to the planned meal service style.
 - a. Meals provided to children must be ready-to-eat or precooked/ready to reheat at home. Cooked potentially hazardous hot foods must be cooked to proper internal temperatures before service.
 - For example, do not send home portions of frozen raw chicken nuggets with instructions for preparing the food at home. Instead, properly cook the chicken nuggets, making them a ready-to-eat food. The chicken nuggets could be delivered hot, or the chicken nuggets could be cooled within standards and sent to the household to reheat, if reheating is desired. Precooked, processed or made from scratch menu items may be included with cooking instructions/food safety guidance provided with the meal(s).
 - b. Potentially hazardous foods must be held at proper temperatures or have time controls applied when serving reimbursable meals in unconventional ways.
 - c. If Time as a Public Health Control is used for a cold potentially hazardous food, the food shall have an initial temperature of 41°F or less when removed from cold holding. The food must be served to the customer or discarded within 4 hours.
 - d. 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 135°F or greater when removed from hot holding. The food must be served to the customer or discarded within 4 hours. Refer to [ICN's SOP on Using Time as a Public Health Control to Limit Bacteria Growth in Potentially Hazardous Foods](#)¹⁶ for more information on using time as the control measure instead of temperature.

- e. 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.
 - f. 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.
 - g. Templates of sample food safety/customer handling labels for grab and go meals are provided from the Kansas Department of Education Kan-Eat (KSDE) COVID-19, [Child Nutrition & Wellness](#)¹⁷ and from [LunchAssist](#)¹⁸.
8. Sponsors may send meals for Same-Day Service and Multi-Day Service.
9. Production records must be completed for each meal.
10. Provide food safety training to newly hired staff and volunteers. Reinforce food safe practices for all program personnel and volunteers.

INSTRUCTIONS FOR SCHOOLS USING A MIXTURE OF CONGREGATE and NON-CONGREGATE FEEDING METHODS DURING AN EMERGENCY:

1. Depending on available waivers, determine which USDA Child Feeding Program you will be participating in. Schools may be able to operate the SFSP during *unanticipated school closures*. Contact your regional specialist to confirm which meal programs you can operate during an unanticipated school closure.
2. Follow the counting and claiming procedures for the respective program.
3. Follow the meal pattern for each system. For SFSP, meals must be unitized (no Offer vs. Serve). For SBP and NSLP, Offer vs. Serve is optional. Meals may be served in the lunchroom, the classrooms, and/or via grab and go.
4. The [School Food Service Safety Precautions](#)⁵ resource from [LunchAssist](#)¹⁵ provides food safety guidelines and best practices for both congregate feeding (when schools reopen) and non-congregate feeding.

REOPENING SCHOOLS AFTER AN EMERGENCY:

Follow the [Montana School Safety Advisory Committee Guidance on School Re-Entry](#)¹⁹ for Phase 1, Phase 2 and Phase 3 and the [Reopening Montana Schools Guidance](#)²⁰.

Based upon the most recent [CDC Considerations for Schools \(released May 19, 2020\)](#)³

Please note, these CDC Considerations are recommendations; not requirements. Consult with your local registered sanitarian to develop an approved plan for your individual school sites.

- Have children bring their own meals as feasible, or serve individually plated meals in classrooms instead of in a communal dining hall or cafeteria, while ensuring the [safety of children with food allergies](#).
- Use disposable food service items (e.g., utensils, dishes). If disposable items are not feasible or desirable, ensure that all non-disposable food service items are handled with gloves and washed in a solution of warm soapy water, rinsed and sanitized or in a dishwasher that also sanitizes (chemical or temperature).

Developed June 16, 2020, revised July 7, 2020

- Individuals should [wash their hands](#) after removing their gloves or after directly handling used food service items.
- If food is offered at any event, have pre-packaged boxes or bags for each attendee instead of a buffet or family-style meal. Avoid sharing food and utensils and ensure the [safety of children with food allergies](#).

School Readiness Plans for Remote, In-person and Blended Meal Service Systems

Schools should develop a readiness plan to address three possible meal service scenarios.

Scenario #1: [Remote \(grab and go\) meal service](#) – students are off campus

Scenario #2: In person meal service – students are on campus

Scenario #2 A - [Meals delivered to the classroom and eaten in the classroom](#)

Scenario #2 B - [Students pick up meal in the cafeteria, return to the classroom to eat](#)

Scenario #2 C - [Students get meal and eat their meal in the cafeteria](#)

Scenario #3: [Blended](#) – a combination of any/all of the above scenarios

MONITORING:

A supervisor will ensure that at least one on-duty staff person is designated to implement this SOP during a viral pandemic incident.

A supervisor will exclude nutrition program employees in accordance with State health directives.

CORRECTIVE ACTION:

A supervisor or other designated employee will retrain and/or provide proper direction to staff and volunteers in application of this SOP during a viral pandemic incident.

VERIFICATION and RECORD KEEPING:

The supervisor or other designated employee will review this SOP annually and include it as part of the site's Emergency Preparedness Plan.

Date Implemented: _____ **By:** _____

Date Reviewed: _____ **By:** _____

Date Revised: _____ **By:** _____

Resources and References

1. The [Viral Pandemic Response SOP](#) was originally developed by Kansas Department of Education, School Nutrition Programs
2. [What School Nutrition Professionals and Volunteers at Schools Need to Know about COVID-19](#), Centers for Disease Control, updated 4/30/20
3. [Coronavirus COVID-19 Specific Considerations for Schools](#), Centers for Disease Control, updated 5/19/20
4. [Employee Health Agreement SOP specific for COVID-19](#), Montana Department of Public Health and Human Services
5. Sample [employee health form](#) from [LunchAssist's School Food Service Safety Precautions Toolkit](#)
6. Sample social distancing signage from [LunchAssist's School Food Service Safety Precautions Toolkit](#)
7. Institute of Child Nutrition [Standard Operating Procedure on Washing Hands](#)
8. [Important Information about Cloth Face Coverings](#) from the Centers of Disease Control
9. Institute of Child Nutrition [Standard Operating Procedure on Personal Hygiene](#)
10. [CDC Guidance for Cleaning and Disinfecting for public spaces, workplaces, businesses, schools and homes](#)
11. Institute of Child Nutrition [Standard Operating Procedure on Cleaning and Sanitizing Food Contact Surfaces](#)
12. [Guidelines for the Use of Chlorine Bleach as a Sanitizer in Food Processing Operations](#), Oklahoma State University
13. [Food and Drug Administration Guidance on how to handle self-service food buffets such as salad bars in a retail setting related to COVID-19](#). Posted 3/17/20.
14. and 15. [Emergency Meal Service Toolkit](#) from [LunchAssist](#)
16. Institute of Child Nutrition [Standard Operating Procedure on Using Time as a Public Health Control to Limit Bacteria Growth in Potentially Hazardous Food](#)
17. [Sample food safety/customer handling labels for grab and go meals](#) from the Kansas Department of Education Kan-Eat (KSDE) COVID-19, Child Nutrition & Wellness
18. [Sample food safety/customer handling labels for grab and go meals](#) from LunchAssist

19. [Montana School Safety Advisory Committee Guidance on School Re-Entry](#), information as of 4/29/20
20. [Reopening Montana Schools Guidance](#), MT OPI, 7/2/20

Developed June 16, 2020, revised July 7, 2020, by Montana OPI School Nutrition Programs and Montana Team Nutrition. The [Viral Pandemic Response SOP](#)¹ was originally developed by Kansas Department of Education, School Nutrition Programs. This resource was based upon Kansas' SOP and existing resources including Centers for Disease Control, Food and Drug Administration, Institute of Child Nutrition, LunchAssist, and Montana Department of Health and Human Services.

The USDA is an equal opportunity provider and employer.

This project was funded using U.S. Department of Agriculture grant funds.