(3) Emergency Plan:
   (a) The center shall have a written plan for handling emergencies, including, but not limited to,
   acute illness of a child or staff, floods, natural disasters (e.g. earthquake, etc.),
   man-caused
   events, such as violence at a child care facility and evacuation of the facility. The plan
   must
   include:
     (A) How the center will ensure that parents or the parents’ emergency
         contacts can be
         reached in person;
     (B) Designation of an alternate safe location in the event of evacuation;
     (C) How the center will inform parents where children will be located in
         the event of
         evacuation and how children will be reunited with their families;
     (D) An accessible file of emergency contact numbers for children and staff;
     (E) Designation of a staff member(s) to take the emergency contact numbers
         file to the
         evacuation site in the event of an evacuation;
     (F) Procedures to address the needs of individual children, including infants and
         toddlers,
         children with special needs, and children with chronic medical conditions;
     (G) An acceptable method to ensure that all children in attendance are accounted
         for;
     (H) Procedures in the event that children must shelter-in-place or if the
         child-care home
         must be locked-down so that no one can enter or leave; and
     (I) Procedures for maintaining continuity of child-care operations.
   (b) All staff shall be familiar with the emergency telephone numbers and
       emergency
       procedures.
   (c) Fire drills shall be practiced monthly. In addition, one other aspect of the emergency
       plan
       shall be practiced every other month.
       (A) The director shall keep a written record of the type, date, time, and
           duration of the
           practices.
(B) If a center has on-site swimming or is responsible for off-site swimming, the practices must include pool and swimming safety.
(d) Fire and other emergency exiting shall not be through a swimming pool area.
Oregon Early Learning Emergency Preparedness and Response Plan

Introduction

In Oregon, over 120,000 young children regularly attend child care, Head Start, preschool, after school care, or other early learning programs outside of their home. Over 7,000 facilities are licensed or regulated by the Early Learning Division to provide child care and early education services. This plan outlines roles and responsibilities of the Early Learning Division and partner organizations in providing support to early education providers and families affected by a disaster.

Between the years 2003 - 2017, Oregon had twelve major disaster declarations, and twenty-nine declarations for Fire Management Assistance Grants. Oregon is a state of great geographic diversity and experiences a wide range of hazards from coastal windstorms and flooding, to high desert fires and snow storms. The Early Learning Division is committed to strengthening partnerships for preparedness and post disaster recovery.

The Early Learning Division convened a planning group included representatives from the public, private and not-for-profit sectors; the full range of child care/early learning providers; local, state and tribal governments; local, state and tribal emergency management; state departments of Education, Human Services, Emergency Management and Public Health; Oregon AFSME labor; and urban and rural areas of the state. The diversity and commitment of planning group members immeasurably strengthened this plan.

1. Purpose:

This plan was drafted to formalize the manner in which the Oregon Early Learning Division addresses the needs of children in early care and education settings in the case of a disaster. This plan addresses children across the full continuum of care and includes, but is not limited to, children in programs authorized under the Child Care Development Block Grant Act of 2014 (CCDBG Act of 2014). The plan addresses the need for safe child care for the period before, during, and after a state of emergency declared by the Governor or a major disaster or emergency (as such terms are defined in section 102 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 US.C 5122).

This plan is required under the legislation cited above, and will be available to the Department of Human Services, Administration for Children and Families. This document offers guidance regarding child care centers, and family child care homes licensed or regulated by the Early Learning Division and strives to provide information relevant to all other early learning/child care programs in terms of recommendations and resources.

2. Scope

This plan applies to all licensed and regulated child care programs and includes but is not limited to receiving child care subsides under the CCDBG Act of 2014. It will be an annex to the Department of Education Continuity of Operations Plan which is currently being updated. It will also be connected to
the Department of Human Services (DHS) Continuity of Operations Plan as DHS administers the child
care subsidy program in Oregon. Finally, this plan will be provided to the Oregon Office of Emergency
Management to include with city, county, tribal and other plans to provide situational awareness in case
of a disaster.

3. Planning Assumptions

The planning team developed the following list of assumptions.

a) Reunification of families following a disaster is a critical issue of concern to child care providers,
emergency responders, the Early Learning Division, families and the state. Families need
adequate reunification plans, and these plans must be integrated with the disaster plans of all
facilities (child care facilities, schools, after-school programs) where children may be.

b) Increasing the percentage of families who have even simple reunification plans is a significant
challenge. Ensuring integration of these plans with the reunification plans of child care facilities
is a large-scale undertaking. Both are necessary for long term success of this plan.

c) Child care providers will be driven to reunite with their own families following a disaster. Given
this, any expectation that providers will be willing or able to provide care for an indefinite period
of time are unrealistic. However, in the case of a catastrophic Cascadia earthquake, alternative
care provided by government entities or the Red Cross may not be available for two weeks or
more. The planning group recognizes the tension between these two realities.

d) Any plan for how the Early Learning Division will deal with the continuum of child care during a
disaster must tackle the challenges of reunification as a core problem with many complexities.

e) Multiple entities need to coordinate information to avoid confusion and inaccuracies. Disaster
research consistently shows that such communication is the exception rather than the rule.
Systems to support such communication will need to be built.

f) There are starkly different challenges for child care providers in rural areas vs. urban areas in
Oregon. The Early Learning Division must develop a plan that accounts for these differences.

g) Different emergencies require different plans. Low impact disasters require a different approach
than high or catastrophic impact disasters. There will be thresholds or “triggers” for what
type/level of disaster results in what action by the Early Learning Division, for example to waive
a rule or requirement.

h) New resources available to child care facilities, state and local emergency management,
Department of Human Services/Oregon Health Authority, the Early Learning Division and other
partner organizations to coordinate and implement collaborative aspects of child care
emergency preparedness will be non-existent or very limited.

i) Resources and tools developed in connection with this plan will be useful to the extent that they
are user-friendly for the child care community and partners. Providing materials in languages
that are most appropriate for providers and the families they serve is a key aspect of being user-friendly.

j) Plans at all levels can only be expected to be helpful to the extent that they are practiced on an ongoing basis. This includes plans at the state, local, child care provider and family levels.

4. Coordination of Activities and Collaboration with other State Agencies

**Oregon Emergency Response System (OERS)** – the purpose of OERS is to coordinate and manage state resource in response to emergencies between all levels of government and the private sector. The Oregon Department of Education representative is Jeremy Wells - 503-947-5782

**Governor's Disaster Cabinet** provides recommendations to the Governor regarding statewide priorities, allocation of limited state emergency resources to help Oregon effectively respond to and recover from disasters. The Oregon Department of Education representative is Rick Crager - 503-947-5658

**Oregon's Children & Families Task Force** was created to ensure that children and families receive the care and attention they need during and after a disaster. Based on the information gathered during the Children & Families Task Force Workshop on May 17, 2018, the need to break down sector silos to more effectively address child safety in disasters has been identified as the initial planning priority. This priority will be addressed through the development of unaccompanied minor protocols, including a state-level child reunification plan, and the sharing of resources between Oregon and Tribal youth-serving organizations that will assist with planning for and responding to all children in disasters. As a result of the work of the planning group for this Early Learning Emergency Preparedness and Response Plan, a subgroup of the Task Force is forming to develop specific protocols and training as part of an ongoing implementation of a statewide preparedness plan for Early Learning entities.

**RAPTOR** – The State of Oregon initiated Real-time Assessment and Planning Tool for Oregon in 2010 to share information on a common operating picture as part of the US Department of Homeland Security's Virtual USA Northwest Pilot Program. RAPTOR enables users' access to live data in combination with traditional map layers to create a comprehensive picture anywhere, anytime. As a Web mapping application, users can display data from various resources into a single map. RAPTOR supports the state's Emergency Operations Plans by sharing information before, during and after an event. The Early Learning Division has access to and can contribute to the RAPTOR system. At any moment in time, the division has the ability to map and identify facilities affected by events and set into motion appropriate response assistance.

5. Coordination of Activities and Collaboration with local resource and referral organizations, the State resource and referral system, and the state Early Learning Council:

The Oregon Early Learning Council is the advisory body for early learning in Oregon. Members are appointed by the Governor. The child care resource and referral system is funded by the Early Learning Division. The local child care resource and referral programs support child care providers through training, technical assistance, quality improvement and referrals. These entities work closely with the Early Learning Hubs to coordinate services for children and families in regions across the state.
A survey to assess the current needs and challenges of child care providers related to disaster planning was undertaken as part of the planning group effort. A state-wide conference of child care providers sponsored by AFSCME provided the first venue for survey completion. Following the conference, the survey was emailed to all providers by the Early Learning Division. The planning group was able to utilize survey results in their planning efforts, as well as in prioritizing implementation activities.

One goal of the state planning group is to develop closer connections between local and state emergency management personnel and state and local child care entities. This will support implementation of the statewide Early Learning Emergency Preparedness and Response Plan. An example of this increased collaboration is the inclusion of Early Learning Division personnel in Oregon Prepared, the 2018 statewide emergency management conference. Six members of the planning group attended the conference.

6. Guidelines for Continuation of Child Care Subsidies and Services

The Department of Human Services conducts eligibility determination and issues payment for child care subsidies. The Continuation of Operations Plan for the agency (DHS COOP) outlines procedures for child care eligibility to immediately prioritize families with an emergent need and may automatically extend certification periods for the duration of the disruption. The Department of Human Services has processes in place to approve and issue payments manually until systems are back online.

The Oregon Department of Education’s Continuation of Operations Plan (ODE CCOP) addresses services provided through Early Learning Division Office of Child Care and describes the arrangements and procedures in place that will enable the agency to respond quickly to an emergency event and ensure continuous performance of critical business functions. Among the critical business functions addressed in the plan are background checks and enrollment in the Early Learning Division Central Background Registry, child care licensing and monitoring, child care facility complaint response and exceptions to child care rules.

Background checks – the plan is designed to have at least 50% of operations up within one week of an incident and at least 80% within two weeks. This is the maximum acceptable length of time that can elapse before the lack of this business function severely affects the public. Key processes and key dependencies are outlined in the COOP. In the case of catastrophic event, such as a Cascadia earthquake, timelines for restoration will depend on resumption of power, water and sewer, health care, cell service and other key systems.

Licensing child care facilities – the plan is based on the assumption that licensing staff would be able to resume licensing and monitoring within two weeks depending on the location and severity of the emergency event. Licensing staff members are located statewide and contingencies are in place to deploy specialists to other areas where necessary and possible, with alternative facility space with minimum business functions available.

Complaints – The recovery time objective for resuming the critical business function of accepting and assessing child care health and safety complaints is dependent on the severity of the emergency disruption. Generally, initial actions on complaints will take place within three days of receiving the complaint.
Rule exception requests – The recovery time objective for receiving and responding to rule exception request is one month. During a State of Emergency an emergency waiver may be granted. Facilities must be located in affected areas and unable to continue to provide services while maintaining compliance with child care facility rules.

7. Provision of Emergency and Temporary Child Care During A Disaster

During a declared State of Emergency, the Governor has authority to suspend the provisions of the Early Learning Division’s Office of Child Care rules. When the governor has signed a proclamation of a State of Emergency suspending the rules, facilities within the geographical area of the declared emergency may continue to provide child care services as directed by the proclamation. The Early Learning Division will facilitate requests and approvals for emergency rule waivers for registered or certified child care facilities by contacting a licensing specialist, email, and messenger or by calling the Emergency Operations line which is monitored only during emergencies.

Among the activities planned for the early learning subgroup of the Oregon Children and Families Task Force is to identify and map facilities throughout the state who accommodate emergency child care for use by first responders.

The Oregon Office of Emergency Management GIS system for situational awareness, RAPTOR, includes location information for all licensed and regulated child care providers in the state. During an emergency, local, city, state and tribal emergency managers may use RAPTOR for situational awareness in an impact zone.

8. Prioritized Listing of Critical Procedures and Functions
   A. Ensure the health and safety of providers and children in care
   B. Issue subsidy payments promptly to providers
   C. Ensure business continuity internally and externally
   D. Maintain recipient/provider confidence
   E. Provide support to licensing personnel and the field across the state.

9. AREAS OF CONCERN

   a) In planning, preparation and response, multiple entities need to coordinate information to be effective. Disaster research consistently shows that such communication is the exception rather than the rule. Systems to support such communication will need to be built. Differences among rural and urban communities will be especially important to account for when developing an effective communication strategy.

   b) A five-year old with short legs functions differently than a thirty-year old with long legs who functions differently than an eighty-year old with arthritic knees. How the specific individuals in any child care facility, children and adults, function must be considered in developing actionable plans. Accounting for the vast differences in functioning – mental, physical, emotional - across state, local, provider and family disaster planning is extremely difficult. The “whole community” approach is meant to address this difficulty. However, the
actual work of large scale collaboration across extremely diverse systems in order to ensure that the needs of all people are planned for requires long term commitment and significant resources to succeed. Taking only one example, translation services to ensure that materials are accessible in all of the languages community members speak is an expensive and time-consuming step.

c) Because of the threat of a Cascadia subduction zone earthquake in the region, the current standard of preparedness in Oregon (adopted by the Oregon Office of Emergency Management) is two weeks. This standard of preparedness is much higher than the traditional 72-hour goal. Fears and questions around impacts of this catastrophic earthquake can make it more difficult to get people to focus on and prepare for much more frequent disasters such as fire, floods, windstorms, etc. However, ignoring the biggest hazard threat to the region is neither possible or wise.

d) Key partners in these efforts will be the early learning/child care system, the Department of Human Services/Oregon Health authority, and state and local emergency management. All of these systems have very limited resources to cover the work they are responsible for. Without dedicated funds targeted at mitigation, preparation, response and recovery, time-intensive, collaborative approaches will be especially difficult to implement.

e) Training in key areas and exercising plans will be critical to the success of these efforts. Designing events to bring together partners from key systems will result in increased effectiveness of training and exercises. Collaborative events are, however, more challenging to implement.

f) Not all key partners have an internal emergency team or an assigned individual or group designated to coordinate emergency preparedness across organizations. Without a structure that allows such coordination, implementation across agencies is severely hampered.

g) Turn-over in leadership within any of the key partner organizations can significantly slow down progress. Trust and relationships develop over time, and collaboration is much more efficient when turn-over is minimal.

h) In an emergency, cognitive function is dramatically impacted. People who have not practiced their responses are unlikely to remember what they planned to do. If a person doesn’t already know an evacuation route from actually following it, they may not be able remember where it is, or where the plan is that details it, during a disaster. This is a critical area of concern since unwise reactions in an emergency can cause injuries or loss of life.
10. COMMUNICATION AND DISTRIBUTION

The communication and distribution list has been compiled to (1) assist all members of the planning group to access individuals and organizations relevant to child care emergency planning, preparation and response and (2) to ensure that all key local, state, federal and tribal emergency management and child care-related organizations are included in widely distributed materialsUpdates related to the implementation of this plan.

Early Learning Division Emergency Preparedness Resources for Families and Child Care
https://oregonearlylearning.com/emergency-preparedness/

Early Learning Division Office of Child Care 1-800-556-6616

Office of the Governor, State Resilience Officer – Mike Harryman mike.k.harryman@state.or.us

Administration for Children and Families Office of Child Care Region X - Agda Burchard, Program Specialist 206-615-2482 agda.burchard@acf.hhs.gov

Administration for Children and Families Regional Emergency Management Specialist Region X– Suzanne Everson Suzanne.everson@acf.hhs.gov

Region X FEMA lead – Ilyssa Plumer 425-487-4500 ilyssa.plumer@fema.dhs.gov

Oregon Department of Human Services – Direct Pay Unit phone number 800-699-9074

Oregon Department of Human Services Mass Care – Stan Thomas Program Manager, Occupational Health, Safety & Emergency Services 503-990-0528 stanton.e.thomas@state.or.us

Oregon Department of Human Services Foster Parent Disaster Planning – Anna Feigum 503-510-9361 Anna.feigum@dshsoha.state.or.us

Oregon Health Authority – Contact for Child Care related response: Kristen Darmody - Mobile voice/text: 971-888-3358 kristen.c.darmody@state.or.us

Office of Child Care Licensing 1-800-556-6616

Child Care Union AFSME - Anneliese Sheahan 503-508-2287 asheahan@oregonafscme.org

Oregon Office of Emergency Management – Andrew Phelps, Director 503-378-3933 andrew.phelps@state.or.us

Oregon Emergency Response System Council – Department of Education representative Jeremy Wells - 503-947-5782 jeremy.wells@state.or.us

Governor’s Disaster Council Department of Education Representative – Rick Crager 503-947-5658 rick.crager@state.or.us

<table>
<thead>
<tr>
<th>Counties Served</th>
<th>Phone Number</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Baker, Grant, Harney, Malheur, Morrow, Union, Umatilla, Wallowa</td>
<td>1-800-559-5878</td>
<td><a href="mailto:crrr@umchs.org">crrr@umchs.org</a></td>
</tr>
<tr>
<td>Clackamas</td>
<td>1-866-371-4373</td>
<td><a href="mailto:crrr@clackesd.k12.or.us">crrr@clackesd.k12.or.us</a></td>
</tr>
<tr>
<td>Clatsop, Tillamook, and Columbia</td>
<td>1-503-338-3369</td>
<td><a href="mailto:NWRegionalCCRR@nwresd.k12.or.us">NWRegionalCCRR@nwresd.k12.or.us</a></td>
</tr>
<tr>
<td>Coos and Curry</td>
<td>1-800-611-7555</td>
<td><a href="mailto:qualitychildcare@socc.edu">qualitychildcare@socc.edu</a></td>
</tr>
<tr>
<td>Deschutes, Crook, and Jefferson</td>
<td>1-888-298-2672</td>
<td><a href="mailto:cccr@neighborimpact.org">cccr@neighborimpact.org</a></td>
</tr>
<tr>
<td>Douglas, Klamath, Lake</td>
<td>1-440-7706</td>
<td><a href="mailto:ccpp@cgcc.edu">ccpp@cgcc.edu</a></td>
</tr>
<tr>
<td>Gilliam, Hood River, Sherman, and Wasco, Wheeler</td>
<td>1-800-755-1143</td>
<td></td>
</tr>
<tr>
<td>Jackson and Josephine</td>
<td>1-541-842-2610</td>
<td><a href="mailto:ccrn@soesd.k12.or.us">ccrn@soesd.k12.or.us</a></td>
</tr>
<tr>
<td>Lane</td>
<td>1-800-222-3290</td>
<td></td>
</tr>
<tr>
<td>Linn, Benton, Lincoln</td>
<td>1-800-845-1363</td>
<td><a href="mailto:connect@linnbenton.edu">connect@linnbenton.edu</a></td>
</tr>
<tr>
<td>Marion, Polk, and Yamhill</td>
<td>1-800-289-5533</td>
<td><a href="mailto:crrrweb@mwvcaa.org">crrrweb@mwvcaa.org</a></td>
</tr>
<tr>
<td>Multnomah</td>
<td>1-866-227-5529</td>
<td><a href="mailto:info@ccrr-mc.org">info@ccrr-mc.org</a></td>
</tr>
<tr>
<td>Washington</td>
<td>1-800-624-9516</td>
<td><a href="mailto:crrr@caowash.org">crrr@caowash.org</a></td>
</tr>
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# Early Learning Hubs

<table>
<thead>
<tr>
<th>Hub Name</th>
<th>Counties</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blue Mountain Early Learning Hub</td>
<td>Umatilla, Morrow and Union counties</td>
<td>Amy Hoffert 541-966-3165 <a href="mailto:amy.hoffert@imesd.k12.or.us">amy.hoffert@imesd.k12.or.us</a></td>
</tr>
<tr>
<td>Clackamas Early Learning Hub</td>
<td>Clackamas County</td>
<td>Chelsea Hamilton 503-367-9116 <a href="mailto:chamilton@clackamas.us">chamilton@clackamas.us</a></td>
</tr>
<tr>
<td>Early Learning Hub of Central Oregon</td>
<td>Deschutes, Jefferson and Crook counties</td>
<td>Brenda Comini 541-480-8993 <a href="mailto:brenda.comini@hdesd.org">brenda.comini@hdesd.org</a></td>
</tr>
<tr>
<td>Early Learning Hub of Linn, Benton &amp; Lincoln Counties</td>
<td>Linn, Benton and Lincoln counties</td>
<td>Kristi Collins 541-917-4908 <a href="mailto:collinsk@linnbenton.edu">collinsk@linnbenton.edu</a></td>
</tr>
<tr>
<td>Early Learning Multnomah</td>
<td>Multnomah County</td>
<td>Molly Day 503-226-9364 <a href="mailto:mollyd@unitedway-pdx.org">mollyd@unitedway-pdx.org</a></td>
</tr>
<tr>
<td>Early Learning Washington County</td>
<td>Washington County</td>
<td>Adam Freer 503-846-4491 <a href="mailto:adam_freer@co.washington.or.us">adam_freer@co.washington.or.us</a></td>
</tr>
<tr>
<td>Eastern Oregon Community Based Services Hub</td>
<td>Malheur, Baker and Wallowa counties</td>
<td>Kelly Poe 208-230-0648 <a href="mailto:kelly.poe@malesd.k12.or.us">kelly.poe@malesd.k12.or.us</a></td>
</tr>
<tr>
<td>Four Rivers Early Learning Hub</td>
<td>Hood River, Wasco, Sherman, Gilliam and Wheeler counties</td>
<td>Christa Rude 541-340-0438 <a href="mailto:christa.rude@cgesd.k12.or.us">christa.rude@cgesd.k12.or.us</a></td>
</tr>
<tr>
<td>Frontier Early Learning Hub</td>
<td>Grant and Harney counties</td>
<td>Donna Schnitker 541-573-6461 <a href="mailto:schnitkd@hearneyesd.k12.or.us">schnitkd@hearneyesd.k12.or.us</a></td>
</tr>
<tr>
<td>Lane Early Learning Alliance</td>
<td>Lane County</td>
<td>Bess Day 541-741-6000 x162 <a href="mailto:bday@unitedwaylane.org">bday@unitedwaylane.org</a></td>
</tr>
<tr>
<td>Marion &amp; Polk Early Learning Hub, Inc.</td>
<td>Marion and Polk counties</td>
<td>Lisa Harnisch 503-967-1185 <a href="mailto:lharnisch@earlylearninghub.org">lharnisch@earlylearninghub.org</a></td>
</tr>
<tr>
<td>Northwest Early Learning Hub</td>
<td>Tillamook, Columbia and Clatsop counties</td>
<td>Dorothy Spence 503-614-1682 <a href="mailto:dspence@nwresd.k12.or.us">dspence@nwresd.k12.or.us</a></td>
</tr>
<tr>
<td>South-Central Oregon Early Learning Hub</td>
<td>Douglas, Lake and Klamath counties</td>
<td>Gillian Wesenberg 541-440-4771 <a href="mailto:gillian.wesenberg@douglas.k12.or.us">gillian.wesenberg@douglas.k12.or.us</a></td>
</tr>
<tr>
<td>South Coast Regional Early Learning Hub</td>
<td>Coos and Curry counties</td>
<td>Heather Baumer 541 435-7080 x221 <a href="mailto:hbaumer.screl@orcca.us">hbaumer.screl@orcca.us</a></td>
</tr>
<tr>
<td>Southern Oregon Early Learning Services</td>
<td>Jackson and Josephine counties</td>
<td>Rene Brandon 541-858-6731 <a href="mailto:rene_branch@soesd.k12.or.us">rene_branch@soesd.k12.or.us</a></td>
</tr>
<tr>
<td>Yamhill Early Learning Hub</td>
<td>Yamhill County</td>
<td>Jenn Richter 503-376-7421 <a href="mailto:jrichter@yamhillco.org">jrichter@yamhillco.org</a></td>
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## APPENDICES

- Exercise and Scenario Guide
- Reunification pocket plan template
- Parent Emergency Preparedness Survey
- Child Care Disaster Survey and responses
- Emergency Preparation and Response Planning Group Roster
DATE: September 9, 2016

MEMO CODE: SP 55-2016, CACFP 26-2016, SFSP 18-2016

SUBJECT: Meal Service during Unanticipated School and Day Care Closures

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

The purpose of this memorandum is to clarify that meals may be served through the Summer Food Service Program (SFSP) or the National School Lunch Program (NSLP) Seamless Summer Option (SSO) during unanticipated school closures, including snow days, during the regular school year. For more detailed guidance regarding the operation of Child Nutrition Programs during emergency situations, see SP 46-2014, CACFP 12-2014, SFSP 18-2014, Disaster Response, May 19, 2014, http://www.fns.usda.gov/disaster-response-0.

Schools and day care programs may face unanticipated closures due to extreme weather events, natural disasters, major building repairs, court orders relating to school safety or other issues, labor-management disputes, or other similar causes. Unanticipated closures prevent students and children enrolled in child care from receiving the nutritious meals normally provided. The Food and Nutrition Service (FNS) encourages school food authorities (SFAs) participating in the NSLP and/or the School Breakfast Program, Child and Adult Care Food Program (CACFP) institutions, and SFSP sponsors to use the flexibilities described below to help ensure that students do not experience a lapse in food security when extreme weather or other events force area schools or day care programs to close.

Using the Summer Meal Programs

The SFSP regulations at 7 CFR 225.6(e)(1)(iii) specifically allow the service of meals during the school year when there are unanticipated school closures. This flexibility is extended to the SSO through SP 37-2015, 2015 Edition of Questions and Answers for the National School Lunch Program’s Seamless Summer Option, May 22, 2015, http://www.fns.usda.gov/2015-edition-qas-nslp%2E%28%2715s-seamless-summer-option.

During unanticipated closures of schools or day care programs, State agencies and Program operators may determine that providing meals through SFSP or SSO is a feasible option. FNS recommends that SFAs and sponsors indicate on their SFSP and SSO applications whether or not they intend to serve meals should unforeseen events occur. If sponsors serve meals during unanticipated school closures, these meals are reimbursed at the appropriate free rates.
When unanticipated school closures occur, State agencies may exempt existing sponsors and SFAs from submitting new applications to participate if the sponsor participated in SFSP at any time during the current year or in either of the prior two calendar years (7 CFR 225.6(c)(1)). In addition, sponsors applying for participation in the Program due to an unanticipated school closure are exempt from the application submission deadline (7 CFR 225.6(b)(1)). Area eligibility requirements still apply for service during unanticipated school closures, except in certain disaster situations (see SP 46-2014, CACFP 12-2014, SFSP 18-2014, Disaster Response. May 19, 2014, http://www.fns.usda.gov/disaster-response-0).

State agencies also may waive the requirement that, during unanticipated school closures, SFSP and SSO meals must be served at non-school sites. This would allow school sites to be used unless doing so would present a safety concern (7 CFR 225.6(d)(1)(iv)). For example, it is possible that schools could be closed due to snowy conditions in parking lots and on adjacent sidewalks in the early morning hours, but by lunchtime, the snow has been cleared allowing safe access to school buildings. Therefore, SFSP or SSO meals could be served once the conditions are safe for children to access the site.

### Using the Child and Adult Care Food Program

State agencies also may allow at-risk afterschool centers to continue serving meals and snacks as part of the At-Risk Afterschool Meals component of CACFP during unanticipated school closures (7 CFR 226.17a(b)(1)). On days when schools are closed, at-risk afterschool centers that normally offer a snack and supper after school may instead choose to offer either lunch and a snack, or breakfast and a snack. These meals and snacks would be reimbursed through CACFP at the free rate. For more information about operating the At-Risk Afterschool Meals component of CACFP, see http://www.fns.usda.gov/cacfp/afterschool-programs.

FNS appreciates the willingness of State agencies and Program operators to consider implementing the various options and flexibilities offered through the Federal Child Nutrition Programs to ensure that children receive the meals they need to remain healthy and active throughout the year.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should direct questions to the appropriate FNS Regional Office.

**Original Signed**

Angela Kline  
Director  
Policy and Program Development Division  
Child Nutrition Programs
DATE: May 19, 2014

MEMO CODE: SP 46-2014, CACFP 12-2014, SFSP 18-2014

SUBJECT: Disaster Response

TO: Regional Directors
Special Nutrition Programs
All Regions
State Directors
Child Nutrition Programs
All States

This memorandum supersedes SP 25-2012, CACFP 12-2012, SFSP 10-2012. Disaster Response and provides an overview of ways State agencies, school food authorities (SFAs) participating in the National School Lunch (NSLP) and School Breakfast Programs (SBP), institutions participating in the Child and Adult Care Food Program (CACFP), and sponsors participating in the Summer Food Service Program (SFSP) can respond to situations resulting from damage or disruptions due to natural disasters such as hurricanes, tornadoes, and floods as well as other exceptional emergency situations or man-made disasters. State agencies should review the avenues available to prepare and plan before a disaster strikes so responses can be as swift as possible.

ELIGIBILITY FOR FREE MEALS AND DISASTER BENEFITS

Children Experiencing Homelessness

Children residing in or evacuated from disaster areas may be determined homeless under the McKinney-Vento Homeless Assistance Act. These children are categorically (automatically) eligible for free meals in the Child Nutrition Programs (CNPs). A school district’s homeless coordinator makes a determination of homelessness and provides a list of all children determined homeless due to a disaster situation. The SFA, institution, or sponsor must certify these children for free meals.

In cases where a household from a designated disaster area moves in with another household, the homeless liaison may determine the displaced individuals homeless under the McKinney-Vento Homeless Assistance Act. Displaced children and adult participants in CACFP are automatically eligible for free meals in centers and tier I meals in family day care homes, even if they are temporarily residing with another family. The host family may include the displaced family members and any income provided to them when applying for free or reduced price meals.
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Institutions and sponsors that require eligibility information can receive certification of the participant’s homeless status from the agency that assisted with the evacuation or that is providing shelter. If the child is not residing in an emergency shelter, the institution should have an adult living with the child complete an income eligibility form indicating that the child is homeless. No further information is required to certify the child’s eligibility.

*Disaster Benefits from the Supplemental Nutrition Assistance Program (SNAP)*

Children in households receiving Disaster Supplemental Nutrition Assistance Program (D-SNAP) benefits are categorically eligible for free meals in the CNPs. Certification of these children may be accomplished through direct contact with the SNAP agency or by an application submitted by a household with a case number.

*Emergency Shelters in the Child and Adult Care Food Program*

Emergency shelters that provide temporary housing to displaced families are eligible to participate in CACFP. Where significant numbers of persons are being temporarily housed, State agencies may designate any appropriate facility as an emergency shelter, and may waive institution application requirements in these situations. When State agencies have designated a facility as an emergency shelter, all children through age 18 may receive up to three free meals (breakfast, lunch, and supper) each day.

An “appropriate facility” may include a school or an institution which, although it is not providing actual shelter, is nevertheless providing meals to displaced families who are being temporarily housed elsewhere, in locations that may not have the means to provide meal services to these temporary residents.

*Certification by School Officials*

School officials may submit applications on behalf of children they know to be homeless and therefore categorically eligible for free meals. See Part 3 of the Eligibility Manual for School Meals for additional information on this option.

*Duration of Eligibility*

Children certified for free or reduced price meal benefits because of a disaster situation are no longer temporarily approved because households are no longer required to report changes in income or household size. Their eligibility, including eligibility based on homeless status or receipt of D-SNAP benefits, remains in effect for the entire school year and up to 30 days in the next school year. CACFP participants remain eligible for free meal benefits for 12 months.
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Carry-Over of Previous Year’s Eligibility by SFAs

The 30-day carry-over of the previous year’s eligibility for school meals is based on operating days. If schools already in session were temporarily closed, or schools delayed opening at the beginning of the school year, the SFA determines the 30-day carry-over period using the number of days schools were actually operating. A child’s prior year free or reduced price eligibility continues until eligibility status for the current school year is established or upon the completion of 30 operating days, whichever is less.

For example, school began on Monday, August 29, 2014, and the foodservice was operating for the five days school was in session. Over the weekend, the school was damaged by hurricane-force winds and rain and was closed until September 19. If the school food service did not operate on any days during that time period because school was closed, the remaining 25 days of the carry-over period would start on September 19 and would end on October 21.

USING THE SUMMER FOOD SERVICE PROGRAM (SFSP) OR SEAMLESS SUMMER OPTION (SSO) IN DISASTER SITUATIONS

State agencies, SFAs, and sponsors may determine that operating SFSP or SSO sites would be useful when schools or day care facilities must remain closed due to disaster situations. SFSP regulations allow expedited approval of feeding sites during an emergency. Organizations with current agreements to operate the SFSP may be approved to open emergency feeding sites (7 CFR 225.6(c)).

State agencies should encourage sponsors to plan for emergency situations in advance to ensure a rapid response. State agencies should pre-approve sponsors to operate emergency feeding sites during unanticipated school closures during their initial application process. For more information on participation in SSO, please refer to the SSO questions and answers at: http://www.fns.usda.gov/sites/default/files/SP39-2014os.pdf

USING USDA FOODS IN DISASTERS

Please refer to the Food Distribution Program’s website for information about using and accounting for USDA Foods in disaster situations: http://www.fns.usda.gov/fd-disaster/food-distribution-disaster-assistance
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FLEXIBILITIES THAT REQUIRE STATE AGENCY OR FOOD AND NUTRITION SERVICE (FNS) APPROVAL

CNP policies are designed to allow flexibility and support continuation of meal benefits to participants in disaster areas. There are existing flexibilities in meal service requirements and administrative procedures that make it easier for States, SFAs, institutions, and sponsors to operate and respond to disaster situations.

Meal Component and Meal Service

Flexibility is allowed with regard to time of meal service and use of offer versus serve. These modifications may be made with State agency approval.

If emergency conditions exist that prevent schools, institutions, or sponsors from obtaining fluid milk, the State agency may allow service of meals without milk or with an alternate form of milk, such as canned or dry milk (7 CFR 210.10(d)(2)(i); 7 CFR 225.16(f)(6); 7 CFR 226.20(e)).

If changes to other meal component requirements are needed, SFAs, institutions, and sponsors should consult with their State agencies. For the school meals programs, 7 CFR 210.10 (m)(4) allows SFAs, with approval from FNS, to serve meals that do not meet the menu planning or meal pattern requirements in disaster situations. In CACFP, 7 CFR 226.20 (i) allows special variations in the food components of meals, with FNS approval.

Accountability and Verification Procedures

In disaster situations, the FNS Regional Offices (ROs) are authorized to allow State agencies, SFAs, institutions, and sponsors to submit claims beyond the 60/90-day requirement. Claims submitted outside of the 60/90-day requirement, as a result of a disaster, are not subject to the one-time exception for late submissions.

If SFAs, institutions, or sponsors need to reconstruct unsubmitted claims due to loss of current records, they must consult with their State agencies. State agencies may approve such requests in consultation with their FNS ROs.

When records required for review purposes, such as paid claims, approved applications and production records, are destroyed, SFAs, institutions, or sponsors should inform their State agencies of the circumstances and dates of the losses, and the types and approximate age of the records that were lost. State agencies should note the losses in their records for the purpose of any future administrative reviews and audits.
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SFAs, institutions, and sponsors that are operational, but unable to maintain normal accountability systems, including counting, claiming, and monitoring, must contact their State agencies regarding how to proceed. In these situations, waiver requests must be submitted to FNS for approval.

With regard to verification under NSLP, the State agency may approve deadline extensions from November 15 through December 15 (7 CFR 245.6a(b)(2)). Extensions beyond that date must be approved by FNS. In addition, FNS may approve alternatives for sample size and selection when the SFA has had a disaster (7 CFR 245.6a(c)(6)).

**CACFP, SFSP, and SSO Site Eligibility**

Based on the significant needs of each community, FNS ROs may waive the requirements under CACFP, SFSP, and SSO that sponsors document that each site is serving an area in which poor economic conditions exist (7 CFR 225.6(c)(2); 7 CFR 226.2 (tier I day care home)). These requirements may be waived for existing eligible sites located in the area damaged by a natural disaster that must relocate to areas that are not eligible based on school or census data.

Additionally, State agencies may waive the requirement that, during an unanticipated school closure, SFSP sites may not be located at school sites (7 CFR 225.6(d)(1)(iv)). Although schools may be closed, some school buildings may be unaffected by the disaster and may be approved as a location for emergency feeding.

**Other Exceptional Emergency Situations or Man-made Disasters**

Other exceptional emergency situations or man-made disasters, such as human pandemic or chemical plant explosions, may impact the ability of schools, institutions, and sponsors to continue normal program operations. In this circumstance, FNS may approve flexibilities to accommodate the needs of severely impacted areas. Flexibilities are provided on a case-by-case basis and will require justification from the requesting State agency. Changes to program operation or administration must be approved by FNS prior to implementation.

State agencies are asked to distribute this Memorandum to Program operators immediately. SFAs should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate FNS RO.

**Original Signed**

Cynthia Long
Deputy Administrator
Child Nutrition Programs