Below are answers to common questions related to serving CACFP meals during COVID-19. Questions that are highlighted have either been added or updated. Click on a heading topic under the Table of Contents below to find information about a specific area. *(Updated 10/2021)*

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**Non-Congregate Feeding Waiver Questions: Providing Meals Off-site**

Agencies must submit a waiver request to DPI for approval prior to providing meals off-site.

*Submit a waiver request using the [CACFP Waiver Request Form](#) (distributing meals off-site).*

The intent of the Non-Congregate Feeding Waiver is to provide meals to participants when meals cannot be served onsite due to COVID-19 for example, the site is closed due to a COVID-19 outbreak or a site is offering a virtual learning option. The waiver is intended to provide temporary flexibility to child care centers or other participating programs and should not be used when regular program operations have resumed. DPI expects these waivers to be used only for the duration and the extent they are needed.

1. **Can a site supply meals to other family members (i.e., siblings, adults), and be reimbursed for these meals?**

   No. If your agency chooses to provide meals to families of enrolled participants (ex. parents, caregivers, siblings), the site may only claim meals supplied to the participant(s) enrolled in the agency program (ex. child care center, Head Start). Do not claim meals served to individuals not enrolled in the CACFP.

2. **When a site supplies meals off-site, are they required to offer meals to all participants, including infants?**

   Yes. If choosing to supply meals to enrolled participants off-site, sites must offer this accommodation for all enrolled participants. Sites cannot discriminate by offering to provide meals to some of their enrolled participants and not others. However, families may decline the site’s offer to provide meals for some of their participants.

   Also, if a family usually supplies infant formula and/or breast milk for their infant and the infant is only developmentally ready for formula and/or breast milk, the site is not obligated to supply formula for this infant’s meals.

3. **Can programs provide a combination of congregate (on-site) and non-congregate (off-site) meals?**

   Yes, when programs participate in the [nationwide waivers](#). See scenarios below.

   1. Programs may provide on-site meal services to participants in attendance and also arrange for off-site meal service (pick-up or delivery) for participants who are temporarily not in attendance. The
participants being served meals off-site must be those who normally would be in care but are not due to COVID-19 (i.e., in quarantine, parent’s exposure concerns, etc.).

2. Programs that have limited hours of operation due to COVID-19 may claim meals served to participants on-site while the site is open, and meals sent home with participants if the site closes prior to its normal time. For example, if a program closes early, before they typically serve a PM snack, the program may claim breakfast and lunch served while the site was open and PM snack sent home with the participants.
   • Programs must ensure the participant is not receiving the same meal/snack on-site and off-site. For example, a participant may not receive an on-site and off-site lunch on the same day. The program must also ensure it does not claim more than two meals and one snack, or two snacks and one meal per participant per day.

4. Can a site claim meals for infants serving only breast milk and/or parent-supplied formula at home?
   No.

5. UPDATED 10/2021 What are the requirements for initiating home meal delivery for a household?
   Programs must obtain written consent from households of enrolled participants (this could include email or other electronic means) that the household wants to receive delivered meals. In addition, programs should confirm the household’s current contact information to ensure meals are delivered to the correct location.

   If an outside organization will be providing meal delivery, the CACFP agency must contact the households of enrolled children and adult participants and notify them that their contact information will be shared with other organizations involved with meal delivery. The CACFP agency must receive written consent from the household to release contact information. Once consent is received, the information may be shared with the outside organization. It is critical that agencies protect the confidentiality of participants and their households throughout this process.

6. What documentation must sites keep for meals served off-site (besides completing the waiver)?
   Sites must keep menus, production records, and meal counts of meals/snacks served to enrolled participants. When providing multiple meals/snacks or multiple days of meals/snacks at one time, keep required documents for each meal/snack on each date.

   If your agency has multiple sites you must document meal counts of meals served by site. The monthly claim is still submitted the same way as when serving meals on-site, which is by site.

7. Must agencies have an “And Justice for All” (AJFA) poster when distributing meals?
   The AJFA poster must be prominently displayed in all facilities and locations that distribute meals. If printed AJFA posters are not available for display, paper copies may be used. Meals delivered from stationary vans or buses should display the AJFA poster. For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed.
   • And Justice For All Poster: may be printed on 8 ½” x 11” paper for temporary use.

8. How many meals can be distributed at one time and how can a site supply multiple days of meals to participants?
   Meals may be provided up to one week at a time. When distributing multiple meals consider:
   • Whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
• Providing foods that require only minimal preparation (i.e., food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.)

Meals may be distributed in the following ways:
• Unitized: each meal component for each meal is portioned out for each participant  OR
• Non-unitized: bulk items are provided for a specified number of meals. The site must provide the following:
  - Foods including all required meal components in the minimum amounts for each meal being claimed;
  - A menu for each meal with directions indicating which items are to be used for each meal and the portion sizes; and
  - Instructions on preparation and food safety.

Refer to Providing Multiple Meals at a Time During the COVID-19 Pandemic for tips.

9. Can meals be provided and claimed outside of the program’s normal operation?

No. Programs cannot provide and claim meals outside of normal operation. This applies even when a program is participating in the non-congregate and meal service time waivers. For example, if a program is licensed for Monday through Friday, meals cannot be claimed for Saturdays and Sundays. This also includes meals served during planned closures, including holidays. This information applies to child care and head start facilities, outside of school hours sites and adult care programs. At-Risk programs refer to question #31 below.

10. Does the participant need to be present for home meal delivery?

No. As long as the agency has obtained the household’s written consent to deliver meals and has verified the current address, the participant does not need to be present at the time of delivery. If the meals are shelf stable, no one needs be present, as long as the address has been verified. Consider State and local food safety requirements and best practices.

11. Can meals be claimed if prepared, but the participant or the family does not pick up the meal?

No. Meals may only be claimed for enrolled participants when they are actually provided to or picked up by the family.

12. What food safety practices must be followed when serving foods that are not shelf-stable off-site (i.e., delivering to homes or providing meals for pick up)?

When storing meals for pick up and/or transferring to families, containers for cold food shall be capable of maintaining the temperature at or below 41°F and containers for hot food shall be capable of maintaining the temperature at or above 150°F. Food delivery vehicles shall be equipped with clean containers or cabinets to store food while in transit.

Provide instructions to families for their storage and preparation of meals. This includes storing food below 41°F (or kept frozen below 0°F, if applicable) and heating food to an internal temperature of 165°F.

• Refer to the Food Safety Tips for more information.

If there is a food safety issue when delivering meals, the agency should reconsider its methods of meal delivery. If the required foods and beverages to meet the meal pattern are not delivered due to food safety concerns, then meals served to participants cannot be claimed.
13. What types of foods may be sent home to families?

A variety of different types of foods may be sent home (i.e., fresh, frozen, canned, etc.) as long as the foods are 1) creditable to the meal pattern, and 2) the site includes clear cooking, storage, and food safety instructions with the meals. When sending meals home, please note the following:

- Raw animal-based food items (raw chicken, raw eggs, raw beef, etc.) should not be sent home to families.
- Store-bought combination foods (e.g., precooked chicken nuggets) and frozen entrees like frozen lasagna, macaroni and cheese, and other pre-made dinners are not creditable unless they have a Child Nutrition (CN) label or the manufacturer’s product formulation statement for crediting information.
- For food safety information to include with the foods, refer to question #7.

14. How must meal counts be recorded for programs serving meals off-site?

Record meal counts in the following ways. If your program is:

- Open and serving meals on-site: Total number of meals served to enrolled participants recorded at the time of service.
- Serving meals on-site and off-site: Compile totals together for each meal/snack
  - On-site: Total number of meals served to enrolled participants recorded at the time of service
  - Off-site: Maintain a roster with the names of enrolled participants and record a meal count for each meal/snack for each day of that week. Programs cannot compile all counts for each meal/snack for the entire week on one day.
- Distributing meals off-site only: Maintain a roster with the names of enrolled participants and record each meal/snack when distributed. Programs cannot compile all counts for each meal/snack for the entire week on one day.

15. Are programs required to serve meals pre-plated instead of family style to reduce the spread of COVID-19?

The CACFP requires programs to follow sanitation and safety guidance issued by State and local health authorities on measures to be taken to reduce COVID-19 exposure. The Department of Children and Families (DCF) provides guidance on this topic. Refer to the Safe Meals and Snack Time section of Guidelines for the Prevention, Investigation, and Control of COVID-19 Outbreaks in Child Care Settings (on DCF’s COVID-19 webpage: Child Care Information for Providers), which recommends not serving family style meals and not sharing utensils/serving tools.

When serving foods pre-plated, an adult must individually serve each component in at least the minimum serving size on the plate and in the cup for each participant receiving a meal. Refer to the Meal Service Styles handout for information on pre-plated meals.

16. Should I use disposable plates, cups, and silverware to serve meals?

Programs are not required, but may use disposable plates, cups, and silverware. If used, the cost to purchase these items is an allowable expense (non-food/kitchen supplies) to the CACFP, if approved in the budget.

If your program is using reusable plates, cups, and silverware, you must follow DCF sanitation requirements when cleaning and sanitizing dishes. Contact your licensor with further sanitation questions.
Meal Pattern Waiver Questions

Agencies must submit a waiver request to DPI for approval of one or more of the following requirements:
(1) That at least one grain serving per day must be whole grain rich,
(2) That the crediting of grains by ounce equivalents must be fully implemented by October 1, 2021, and
(3) That low-fat (1%) milk must be unflavored (Only participants 6 years and older may be served flavored milk).

Submit a waiver request using the Meal Pattern Flexibility Waiver Request Form.

The waiver may only be utilized when safe access to meals cannot be provided and/or food cannot be obtained for CACFP participants. DPI expects this waiver to be used only for the duration and the extent they are needed.

17. What options are available on meeting the requirement of at least one grain serving per day must be whole grain rich (WGR)?

Below are options for how programs can meet the requirement to serve at least one WGR item per day.
- Serve other WGR items that are available (ex. bread, tortillas, crackers (Wheat Thins, Triscuits, Goldfish, etc.), rice cakes, English muffins, bagels, cereal, oatmeal, quinoa, pasta, brown rice, wild rice, etc.).
- Make homemade WGR items like bread or muffins with whole wheat flour. There are standardized recipes on the Child Nutrition Recipe Box website. Click on “Search Recipes” and type in “muffins.” That will bring up WGR recipes for the CACFP including one for Breakfast Muffins and a WGR Dinner Roll.

18. What resources are available to assist with implementation of crediting grains by ounce equivalents?

The DPI provided training on this topic and there is a recording of the webinar. Additional resources on implementation for grains by ounce equivalents can be found on the Ounce Equivalents for Grains webpage. Other resources have been updated to reflect these changes. Refer to Guidance Memorandum 12: Meal Requirements.

19. UPDATED 10/2021 Are sites required to accommodate special dietary needs (SDN) during COVID-19?

Yes, the requirement to meet special dietary needs for participants with disabilities is not waived and programs are still required to accommodate meals. When planning a non-congregate meal service, state agencies and program operators should consider how individuals who require meal modifications will be identified and served.

20. Can sites serve non-creditable foods in place of creditable foods since some foods that are normally served cannot be purchased or are limited?

No. Sites cannot serve non-creditable foods (i.e., grain-based desserts, chips, etc.) in place of creditable foods. During this public health emergency, it is even more important that sites serve healthy meals and stay as close to the nutritional guidelines as possible. Refer to questions 17 and 23 for ideas of how to meet the meal pattern requirements when some items cannot be purchased.

21. Are sites still required to provide a variety of foods on menus during COVID-19?

No. There are no federal requirements to rotate menu items; however, it is recommended to serve a variety of foods to the extent possible.
22. **UPDATED 10/2021** If an agency chooses to supply meals to all family members of enrolled children, can the Meal Pattern Waiver be used if the agency cannot find enough food for the entire family?

   No. The waiver cannot be used when an agency cannot find enough food or CACFP food components for an entire family. The waiver may only be utilized when safe access to meals cannot be provided and/or food cannot be obtained for CACFP participants. Serving meals to an entire family is outside of the CACFP and cannot be a reason cited for unavailability of foods. The site may only claim meals supplied to the participant(s) enrolled in the program (ex. child care center, Head Start). Meals served to individuals not enrolled in the CACFP must not be claimed.

23. What if stores are limiting certain items (e.g., store limits on products, lack of proteins/meat, accessing cleaning and disinfecting products, etc.)?

   The current meal pattern waiver only applies to specific CACFP requirements outlined in the nationwide waiver. For any food items or supplies being limited by a store, it is suggested to reach out to grocery store owners and managers to make them aware of your needs. Check out the [Connecting with Your Local Grocery Store](#) handout for talking points and tips to use when talking with your local grocer. If you are still unable to obtain required meal components, contact your assigned consultant.

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**Monitoring for Sponsoring Organizations (More than one site)**

24. **UPDATED 10/2021** Can programs complete preapproval reviews and monitoring visits off-site (e.g., as desk audits)?

   Yes, preapproval reviews for new facilities are still required, however, sponsoring organizations may conduct preapproval reviews off-site through a desk audit. Monitoring visits may be completed off-site to minimize exposure to COVID-19.

25. When completing monitoring off-site, are sponsoring organizations required to meet the other monitoring requirements outlined in Guidance Memorandum 5?

   As of 10/1/21, all monitoring requirements listed below (and in GM 5) must be met:
   - Review facilities 3 times per year
   - 2 of 3 reviews must be unannounced
   - One unannounced review must include a meal observation
   - Review of a new facility in first 4 weeks
   - No more than 6 months between reviews

26. How should programs document off-site monitoring visits?

   Document the off-site monitoring visits using the sponsor’s regular site/monitoring visit form, such as the [CACFP Site Review Form](#) found under GM 5 or an alternate form that has been pre-approved by DPI. Complete the questions to the best of the monitor’s ability for the circumstances. Include a notation the off-site visit was completed due to COVID-19. See [COVID 19: Guidance for Completing CACFP Off-Site Monitoring](#) for more information.
At-Risk Afterschool Programs

At-Risk Afterschool Programs must only operate and claim under the CACFP during the school year.

School Food Authorities (SFAs) and community organizations are encouraged to coordinate site locations under the CACFP At-Risk to prevent duplication.

27. **NEW 10/2021** For CACFP At-Risk Afterschool Programs that are providing on-site care to participants attending school virtually due to COVID-19, what meals may be served?

Per CACFP regulations, when school is in session, a CACFP at-risk meal and/or snack must be served after the participant’s school day. Schools that are operating virtually in any capacity are considered to be in session; therefore, the afterschool program would need to plan their meal service around the time of the virtual school day. Only a meal and/or snack served after the virtual school day is over would be reimbursable.

28. **NEW 10/2021** For CACFP At-Risk Afterschool Programs that are providing meals off-site due to COVID-19, what meals may be served?

Up to one meal and one snack may be claimed depending on what the agency is approved for in their CACFP contract. This meal and/or snack may be distributed before the end of the school day (i.e., delivering to homes or providing meals for pick up). The CACFP At Risk Afterschool Program must complete and submit the Waiver for Off-Site Meals request prior to providing meals off-site.

29. Are CACFP At-Risk Afterschool Programs required to provide an enrichment activity when providing non-congregate meals?

Yes. At-Risk Afterschool Programs providing non-congregate meals must provide an education or enrichment activity for each day the meal/snack is served. Although participants are not required to take part in or complete the activity in order to receive an afterschool meal or snack, an activity must be offered. When meals are served using the off-site meals waivers, activities may be conducted virtually or in other non-congregate ways. However, activities must include options that are accessible to all participants, including when they do not have access to the required technology for virtual options. Below are ideas for education or enrichment activities:

- Activity ideas for participants without internet access or electronic devices may include books, activity packets, or coloring sheets.
- Virtual or other non-congregate ideas include offering online homework assistance, activity packets, electronic games and books, or other e-learning activities for participants to complete at home. Team Nutrition offers a variety of online games, books, and nutrition education activities: [Digital Nutrition Resources](#). Another resource for virtual enrichment activities is [No Kid Hungry](#).

30. Are CACFP At-Risk Afterschool Programs required to maintain attendance records when providing non-congregate meals?

CACFP At-Risk afterschool programs who choose to provide non-congregate meals must continue to maintain daily attendance records as required by CACFP regulations. This includes daily attendance rosters, sign-in sheets or, with state agency approval, other methods which result in accurate recording of daily attendance. When children participate virtually, flexibility in using other methods to track attendance may be needed and must be discussed with your consultant prior to implementing. At-risk programs must still maintain daily meal counts for non-congregate meals too (see question 14).
31. **NEW 10/2021** Are take-home weekend meals allowed in the CACFP At-Risk Afterschool Program?

Yes, if the At-Risk afterschool programs normal operation includes weekends and is approved for weekend operation in the program’s CACFP contract. The program must provide weekend enrichment activities, either in person or virtually, on the weekend days for which meals are served. Programs must follow the maximum of one snack and one meal per participant per day if weekend meals are served.

32. **UPDATED 10/2021** Can a School Food Authority (SFA) that participates in both SSO and CACFP At-Risk Afterschool Program provide meals and snacks through SSO and At-Risk to each participant? Do the programs have to be operated at the same site or different sites? Can participants pick up multiple meals at once?

An SFA approved for both SSO and CACFP At-Risk afterschool programs, can operate them at the same or at different sites. The SFA may allow participants to pick up multiple meals from each Program at one time. However, the maximum number of meals that may be offered to each participant may not exceed the number of meals allowed by each Program.

- Under SSO, up to two meals or one meal and one snack, per participant, per day, in any combination except lunch and supper, are allowed.
- Under CACFP At-Risk afterschool programs, up to one snack and one meal per participant per day are allowed.

For example, a participant could potentially receive a breakfast/lunch under SSO and a supper/snack under CACFP At-Risk afterschool program each day. If the SFA is operating both SSO and CACFP At-Risk afterschool program at the same site and all meals for both Programs are picked up at the same time, the SFA must keep accurate meal counts and claim only the meals served for that specific Program.

The State agency may approve a plan that includes pick-up of meals for multiple days, up to one week at a time. Agencies serving meals off-site must elect to participate in the off-site meal waivers. Refer to the CACFP COVID-19 Information webpage to learn how to apply for the waivers for each Program.

33. **NEW 10/2021** May CACFP At-risk Afterschool Programs providing extended care during the day (both school hours and afterschool hours) claim reimbursement for a breakfast and/or lunch served in addition to the one meal and one snack allowed for at-risk?

No. Agencies that are only approved to operate under the CACFP At-risk afterschool program may not claim reimbursement for meals that exceed their Program meal limitation of one meal and one snack per participant, per day.

34. **NEW 10/2021** Does the [Nationwide Waiver of Area Eligibility](Child Nutrition Response #93) exempt At Risk Afterschool programs from completing the Health & Safety documents if the site is not licensed?

No. Non-licensed At-Risk Afterschool sites must meet the Health and Safety requirements.

If the site is operating in a school that participates in the NSLP/SBP, either administered by the school district or an outside organization (i.e., YMCA or Boys & Girls Club), health and safety standards are not required. However, outside organizations operating in a school must complete the [Group Child Care License Exemption](form).
35. **UPDATED 10/2021** Can a program on the CACFP get meals from a sponsor participating on Summer Seamless Option (SSO)?

Effective at the beginning of school year 2021-2022, child care centers participating in the CACFP must remain in CACFP and cannot receive meals through the SSO program operated by School Food Authorities (SFA) or other approved sponsors.

36. **NEW 10/2021** May children that are unable to attend a child care center due to a closure participate in SSO sites operating through June 30, 2022?

Yes, if the meal feeding site is operating as an open site. Open sites may feed all children ages 18 and under.

### Claims Processing and Reimbursement Questions

37. **Will additional CACFP funding be available?**

Additional funding is available to program operators based on the Food and Nutrition Service (FNS) published guidance for the Child Nutrition Program Emergency Operational Costs Program. Under this authority, FNS is offering a one-time payment of additional funds to state agencies administering the CACFP to provide to eligible program operators with additional reimbursements for emergency operating costs they incurred during the public health emergency. These payments have been distributed to eligible programs.

38. **Will there be any disruptions in CACFP reimbursement?**

There is no change to the DPI claim processing and payment schedule.

39. **If a site closed in the middle of the month, can the claim be submitted before the month has ended?**

No. You cannot submit claims until after the month has ended.

40. **Can sites provide meals to families of enrolled participants (ex. parents, caregivers, non-enrolled siblings) and other adults in the community if they pay for the meal?**

If the agency has the capacity to provide meals to adults or other non-enrolled individuals, they may do so but cannot claim for those meals. The site may elect to either charge for these meals or use non-CACFP funds to pay for those meals.

41. **Can sites be reimbursed for more than two meals and one snack or two snacks and one meal per participant per day during COVID-19?**

The maximum number of meals or snacks that can be claimed for Federal reimbursement, per participant, per day is the same as under regular CACFP operation:

- **Child and Adult Care Programs:** Up to two meals and one snack, or two snacks and one meal, per participant per day;
• At-Risk Afterschool Meals Component: Up to one meal and one snack, per participant per day;
• Emergency Shelters: Up to three meals, per resident 18 years and younger, per day

42. Can sites be reimbursed for meals served to participants over the age of 12 years?
Child care sites can only claim meals for participants through age 12 years, unless they have a disability that is supported by valid documentation (school’s IEP). At-Risk Afterschool Sites can claim meals for participants 18 years and younger. Emergency Shelters can claim meals for participants under age 25.

43. Can sites be reimbursed for meals not approved within their CACFP contract?
No. Meals must be approved within the CACFP contract prior to being claimed for reimbursement. The CACFP contract can be updated to add additional meals. Contact your assigned consultant for further information.

44. Can I claim all participants as free during the COVID-19 public health emergency?
No. Child care centers, outside of school hours centers, and adult care centers must categorize their participants as free, reduced, or non-needy based on their complete and valid Household Size Income Statements.

45. Can I include all of my claim totals for meals/snacks under one site, even though my program is a Sponsoring Organization (more than one site)?
No. Sponsoring Organizations must complete the claim by site even when the organization is serving or distributing meals to all participants from all sites at one location or delivering meals to multiple locations. This includes enrollment (HSIR), days of service, ADA, meal counts, and claim edit checks.

46. May Child Nutrition Program operators that have received a loan through the Paycheck Protection Program (PPP), made available through the Small Business Administration (SBA) and qualified lending partners, use SFSP or CACFP Program reimbursement funds received from DPI to pay back a PPP loan?
Congress authorized the Paycheck Protection Program (PPP) through the CARES Act and Consolidated Appropriations Act, 2021 to help businesses facing extenuating circumstances due to the COVID-19 pandemic to cover their payroll expenses. Some sponsors have used PPP funds to pay for Child Nutrition Program labor expenses.

Under certain circumstances, a PPP loan may be forgiven.

• **If the PPP loan is forgiven:** Any Child Nutrition Program expenses paid for using those forgiven PPP funds may not be claimed using Child Nutrition Program funds since they have already been paid with another source of Federal funding.

• **If the PPP loan is not forgiven:** Child Nutrition Program funds may only be used to repay that portion of the loan which was used to cover allowable Child Nutrition Program expenses. This is consistent with existing guidance outlined in FNS Instruction 796-2 Rev. 4 (refer to heading titled *Costs Funded From Other Sources and Under Recovery of Costs*). Program operators using Child Nutrition Program funds to repay any portion of a PPP loan must fully document such repayments, be able to demonstrate that funds were properly allocated, and that such repayments were limited to the portion of the loan that was used to cover allowable expenses under the Child Nutrition Programs. In most circumstances, FNS anticipates that the same payroll cost allocation used by the program operator under normal procedures will continue to apply when considering PPP repayments, though exceptions may occur.
However, please note that interest due in connection with a PPP or other loan repayment is not an allowable cost and may not be paid using Federal Child Nutrition Program funds, per requirements at 2 CFR 200.449(a). Program operators are further reminded that Child Nutrition Program funds may only be used to pay for allowable Child Nutrition Program expenses. For any portion of a PPP loan that was used to pay for non-Program expenses, Child Nutrition Program funds may not be used for repayment.