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 11/2020*)

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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.
To submit a waiver request, go to: [https://forms.gle/XVioT6iMHW8QpWKv9](https://forms.gle/XVioT6iMHW8QpWKv9)

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 enrolled 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. **NEW 11/2020 Can programs provide a combination of congregate and non-congregate meals?**

   Yes, when programs participate in the nationwide waivers. See scenarios below.

   1. Programs may provide congregate meal services to participants in attendance and also arrange for non-congregate meal service (pick-up or delivery) for participants who are 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 center is open and meals sent home with participants if the center 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 center 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.

Refer to question #39 in the Claims Processing and Reimbursement section for how to compile and submit claims when providing meals on-site and off-site.

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

5. What are the requirements for initiating home meal delivery for a household?
   Agencies 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, agencies should confirm the household’s current contact information to ensure meals are delivered to the correct location. 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 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
   - 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. **UPDATED 11/2020** 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 #2 below.

For a potential option for meals served during the times outside your program’s normal operation, contact your local school district.

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 to be present, as long as the address has been verified. Consider State and local food safety requirements and best practices. Check out Shelf-Stable Menu Item Ideas.

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 40°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:
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- 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 entrées 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. If children enrolled at the childcare site are receiving off-site meals from another agency’s meal program, may the childcare site send the same meals home to these enrolled children and claim them for reimbursement?

No, the childcare site should not send home and claim for the same meals supplied by another agency’s meal program. This is considered “double claiming” of meals within the Child Nutrition Programs. If other meal programs are serving participants within your community, ask the families if your enrolled children are receiving meals by home delivery or pick-up from another program. If they are, the childcare may offer to provide meals as an alternate choice, but the family must decide between the two, either meals from the childcare or the other agency.

15. 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.

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**Serving Meals Onsite**

16. 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 [DCF #19: Updated guidance on child care centers providing care during COVID-19](https://www.dcf.idaho.gov), which states to not serve family style meals and to not share utensils or 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](https://www.dcf.idaho.gov) handout for information on pre-plated meals.
17. 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 when serving a specific meal component(s) is disrupting safe access to nutritious meals and/or when foods are temporarily unavailable due to supply shortages. To submit a waiver request, go to: [https://forms.gle/4Hurq1cFxAvEh3Si6](https://forms.gle/4Hurq1cFxAvEh3Si6)

18. Are sites required to accommodate special dietary needs (SDN) during COVID-19?

Yes, the requirement to meet special dietary needs for children with disabilities is not waived and you are still required to accommodate the meals.

19. 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.

20. 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.

21. 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.

22. What if the local grocery store is limiting certain items (e.g., store limits on products, lack of proteins/meat, accessing cleaning and disinfecting products, etc.)?

It is suggested to reach out to grocery store owners and managers locally to build a relationship. If a grocery store owner or manager is aware of your needs, they may be in a better position to help. 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, complete the meal pattern waiver request (link provided above).
23. Can programs complete monitoring visits off-site (e.g. as desk audits)?
   Yes, monitoring visits may be completed off-site to minimize exposure to COVID-19.

24. When completing monitoring off-site, are sponsoring organizations required to meet the other monitoring requirements outlined in Guidance Memorandum 5?
   Yes, all other monitoring requirements outlined below (and in GM 5) must be met:
   - Sponsor must 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

25. How should programs document off-site monitoring visits?
   Document the off-site monitoring visits using the sponsor’s regular site/monitor visit form, such as the CACFP Monitoring 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.

At-Risk Afterschool Programs

26. **UPDATED 11/2020** Can At-Risk Afterschool Programs claim meals for participants in virtual learning?
   Yes. At-Risk programs are allowed to serve after school snacks and suppers on days schools are open for instruction (in person and/or virtual learning). Along with serving meals after school, at-risk programs may serve one meal (breakfast, lunch, or supper) and one snack per day on weekends or holidays as documented and approved in the CACFP contract.

   USDA extended multiple Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) waivers through June 30, 2021. Breakfast and lunch meals on school days can be provided through the SFSP, SSO or School Breakfast Program (SBP) and the National School Lunch Program (NSLP). If you are a SFSP sponsor and wish to serve meals during this period you will need to update your SFSP contract. Agencies and local schools will need to work together to maintain program integrity to ensure that duplicate meals are not served and claimed. Visit the Emergency Summer Meals COVID-19 Information webpage for more information.

27. **UPDATED 11/2020** Are At-Risk Afterschool Programs required to provide an enrichment activity when providing non-congregate meals?
   Yes. At-Risk 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 non-congregate and parent pick-up 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.

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

At-risk afterschool programs who choose to provide non-congregate meals only need to maintain daily attendance records for participants who physically attend the program (sign-in sheets or, with state agency approval, other methods which result in accurate recording of daily attendance). At-risk programs that do not have participants actually in attendance do not need to maintain daily attendance records. However, the program must maintain accountability and program integrity, including processes to ensure meals are provided to participants, and that they do not receive duplicate meals from other child nutrition programs (i.e. NSLP, SBP). At-risk programs must still maintain daily meal counts (see question #14).

29. May school age children who attend a child care center during virtual school time get meals from a school or other agency that participates in NSLP, SFSP, SSO, or SBP?

Yes, however, if the school is providing and claiming meals served to the enrolled school-agers participating in virtual school at the center, those meals cannot be claimed under the CACFP. Also, child care sites cannot serve and claim the same meals to school-age children receiving meals through the school or other agency participating in NSLP/SFSP/SSO/SBP. This is considered “double claiming” of meals within the Child Nutrition Programs.

30. **UPDATED 11/2020** Can a program on the CACFP get meals from a sponsor participating on SFSP/SSO?

Yes, if the SFSP/SSO sponsor has the capacity to provide meals. The CACFP program must:

- Inform families about participation in the SFSP/SSO and confirm that the family is not receiving meals from another SSO/SFSP site. Provide a statement of certification to the SFSP/SSO sponsor.
- Discuss the plan for receiving meals under SFSP/SSO with the assigned CACFP consultant, including who will provide the infant meals. The SSO/SFSP sponsor must provide accommodations for children with disabilities who attend the center.
- Ensure all meals provided by the SFSP/SSO meet CACFP Meal Pattern requirements for all participants, including infants.

The CACFP program cannot claim meals provided by SFSP/SSO (ex. breakfast and lunch). However, the CACFP program may provide and claim the following:

- Meals/snacks not provided by the SFSP/SSO sponsor (ex. PM snack)
- Infant meals, if not provided by the SFSP/SSO sponsor
- Meals/snacks not provided by the SFSP/SSO sponsor during closures due to COVID-19 or planned breaks, such as spring break

Completing an agreement between the CACFP program and SFSP/SSO sponsor is recommended to indicate who will provide infant meals/snacks and meals during closures. The agreement should also confirm that the SFSP/SSO sponsor will provide accommodations for children with disabilities. The agreement should outline dates the SFSP/SSO sponsor is unable to provide meals. The CACFP program must maintain any provided support documentation on file for meals provided by the SFSP/SSO sponsor.
31. Will additional funding be available to cover costs when reimbursement decreases due to a decrease in enrollment and claimed meals?

No. The only funding that is available is through the normal claim reimbursement received from the submission of the number of meals served to eligible participants.

32. Will there be any disruptions in CACFP reimbursement?

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

33. 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.

34. 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.

35. 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

36. 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 and Emergency shelters can claim meals for participants 18 years and younger.

37. 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.

38. 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.
39. How do I complete the CACFP claim when serving meals on-site and off-site, or off-site only?
   Refer to the COVID-19 CACFP Claims for specific instructions.

40. 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.

41. Should all enrolled participants be included in the enrollment data (F, R, N)?
   It depends on the program’s enrollment policy and if meals are served on-site, off-site, or a combination of both. Refer to the COVID-19 CACFP Claims for specific instructions.