



Below are answers to common questions related to the CACFP 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: Distributing Meals Off-site** (Questions 1-19)

Includes Meal Service Time Flexibility and Parent Pick-up of Meals Waivers

#### **1. Do providers need to submit a waiver request to distribute meals off-site to their enrolled children?**

Yes. Providers must submit a waiver request to distribute meals off-site to their enrolled children.

Starting October 1, 2020, **providers who previously submitted waiver requests will need to re-submit them** to continue distributing meals off-site to their enrolled children. Furthermore, starting October 1, 2020, provider waiver requests for distributing meals off-site must include a waiver request for the *Meal Service Time Flexibility Waiver* as well as the *Parent Pick-up of Meals Waiver* if families are picking up meals at the provider's home.

- The *Meal Service Time Flexibility Waiver* allows meals distributed off-site to be served outside of their regular meal times AND allows providers to distribute multiple meals at one time. Providers must submit this waiver request along with their waiver request to distribute meals off-site; these two waivers go together.
- The *Parent Pick-up of Meals Waiver* allows providers to distribute meals off-site through pick-up by family members on behalf of their enrolled children. Providers must submit this waiver request when they will be distributing meals off-site through pick-up methods, along with their requests for meal service time flexibility and distributing meals off-site; these three waivers go together.

#### **2. **Updated 11/2020** Can a provider claim meals distributed off-site outside of their normal operation (i.e. additional meal types, days, etc.)?**

**No.** Providers may only claim meals distributed off-site for their normal operation (*as indicated on their regulation for hours of care.*)

Examples:

- If licensed to operate only Monday through Friday, the provider cannot claim meals distributed off-site for Saturday and Sunday. This includes planned closures, i.e. during holidays.
- If the provider does not normally serve a meal type to children in care, for example supper, they must not claim suppers distributed off-site.

**FDCH sponsors must notify providers currently approved to claim meals distributed off-site outside of their normal operation that they are no longer permitted to claim these meals.**



**For questions 3-8, children normally in care are those who would be in attendance had it not been for COVID-19.**

**3. *New 11/2020* Can providers claim meals served by a combination of on-site and off-site methods?**

Yes. Providers must be approved to distribute meals off-site by submitting a waiver request to their sponsor. See scenarios below.

- Providers may claim meals served on-site to children in attendance as well as meals distributed off-site (by pick-up or delivery) to children who **normally would be in care**, but are not due to COVID-19 (i.e. in quarantine, parent's exposure concerns, etc.)
- Providers who have limited their hours of operation due to COVID-19 may claim meals served on-site while they are open and meals sent home with children that would have been typically served had they not been closed. For example, if the provider closes early, before they typically serve a PM snack, they may claim breakfast and lunch served while in care and PM snack sent home with the children.
  - Providers must ensure the children do not receive the same meal/snack on-site and off-site. For example, a child may not receive an on-site and off-site lunch on the same day.

**4. *Updated 11/2020* Can sponsors reimburse for meals exceeding the provider's capacity when they are distributing some or all of these meals off-site?**

Yes. However, the children 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. Since the children being served meals off-site are not under the provider's license or certificate, the number of meals claimed could go over their regulation's capacity, but should not be excessive.

**5. Can a provider enroll new children while their daycare is closed for distributing off-site meals to them?**

No. New children cannot be enrolled only for the sake of distributing off-site meals to them.

**6. Can a provider supply off-site meals to other family members, like siblings and adults, and be reimbursed for these meals?**

No. If a provider chooses to supply meals to other household members of their enrolled children (ex. parents, caregivers, siblings), the provider may **only claim meals supplied to their enrolled children normally in care**.

The provider must not claim meals served to any other individuals than their enrolled children.

**7. When a provider is supplying meals to their enrolled children off-site, are they required to offer off-site meals to all of their enrolled children, including for infants?**

Yes. Providers must offer to supply meals off-site for all of their enrolled children **who would normally be in care**. Providers cannot discriminate by offering to provide meals to some children and not others. However, families may decline the provider's offer to supply meals for their children.

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 provider is not obligated to supply formula for this infant's meals.

**8. Can providers supply meals off-site to their enrolled children **normally in care** regardless whether their parents are working from home or are home due to lay-off as a result of COVID-19?**

Yes. The employment status of the children's families does not impact their eligibility to receive off-site meals.



**9. Can a site claim meals for infants serving only breast milk and/or parent-supplied formula at home?**

No.

**10. Can a provider claim for meals served to her own children when serving meals to her other non-residential enrolled children off-site?**

Yes. If the provider's own children are Tier 1 eligible, she can claim their meals if she is supplying the same meals to other non-residential enrolled children off-site. This rule is not different for serving on-site and off-site meals.

**11. Can a provider claim her own children's meals if her childcare is closed and the parents of her non-residential enrolled children declined her offer to supply meals off-site?**

No. If meals are not served to other non-residential children (either off-site or on-site), she cannot claim for her own children's meals.

**12. Can the provider claim for meals if prepared, but not picked up by the enrolled children's family?**

No. The provider may only claim meals for enrolled children when they are actually provided to or picked-up by the family.

**13. What are the requirements for initiating home meal delivery for a household?**

Providers must obtain written consent from their enrolled children's family that they want to receive delivered meals (this could include email or other electronic means). In addition, providers should confirm that they have the family's current contact information (*home address*) to ensure meals are delivered to the correct location. It is critical that providers protect the confidentiality of their enrolled children and their families throughout this process.

**14. Do the enrolled children need to be present for home meal delivery?**

No. As long as the provider has obtained the family's written consent to deliver meals and has verified their current address, the enrolled children do 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 current address has been verified. Providers should consider State and local food safety requirements and best practices. Check out [Shelf-Stable Menu Item](#) Ideas.

**15. How many meals can be distributed at one time and how can a provider supply multiple days of meals to children?**

Meals may be provided **up to one week at a time**. When distributing multiple meals, providers must 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 child **OR**
- **Non-unitized:** bulk items supplied for a specified number of meals. Providers 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 for which items to use 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.



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

The provider must take steps to keep cold foods at or below 40°F and hot foods at or above 150°F while storing meals for pick-up and/or transferring meals to families. This includes while in the vehicle for transporting meals to the enrolled children's homes (either when delivered by provider or during the ride home if the family picks up the meals).

Providers must also give instructions to families on how to store and prepare the meals. This includes storing food below 41°F (or kept frozen below 0°F, if applicable) and on heating food to an internal temperature of 165°F. Refer to the [Food Safety Tips](#) for more information.

If a provider has food safety concerns about sending meals home, they should reassess their options for supplying the meals, foods on the menu, storage method, delivery versus pick-up, etc. If the required foods and beverages to meet the meal pattern are not served to the enrolled children due to food safety concerns, the meals cannot be claimed.

### 17. 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 provider includes clear cooking, storage, and food safety instructions with the meals. Providers should consider the following:

- Because raw animal-based food items, such as raw chicken, raw eggs, raw beef, etc. are high risk for cross-contamination and causing food-borne illness, **it is strongly advised to not send them home to families.**
- Store-bought combination foods (e.g. precooked chicken nuggets) and 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 #14.

### 18. What type of documentation do providers need to keep for serving meals off-site (besides submitting a waiver request)?

Providers must continue recording menus and meal counts of meals/snacks served to each enrolled child. When providing multiple meals/snacks or multiple days of meals/snacks at one time, they must keep these required records for each date.

### 19. Other Meal Programs:

**If the provider's enrolled children are receiving meals from another agency's meal program, may they send the same meals home to these enrolled children and claim them for reimbursement?**

No. The provider must 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 children in the provider's area, request that providers ask the families if their enrolled children are receiving meals from another program.

If they are, the provider may offer to supply meals as an alternate choice, but the family must decide between the two, either to receive meals from their provider or the other agency.

*School districts and other agencies operating meal programs during COVID-19 may be authorized to provide meals off-site (home delivery or pick-up) to all children enrolled in their schools/programs, plus their siblings and other children living in the household.*



**Providing Meals On-site Questions** (Question 20-21)

**20. Updated 11/2020 Other Meal Programs:**

Can a provider receive meals from another meal program to serve their enrolled children while in care? *Examples include schools or community organizations currently offering free meals through their participation in the Summer Seamless Option (SSO) or Summer Food Service Program (SFSP).*

**Yes,** if the SFSP/SSO agency has the capacity to provide these meals. The provider must:

- Discuss with their FDCH sponsor the meals they would like to receive from the SFSP/SSO agency, including who will be providing meals for their infants. *The SSO/SFSP agency must provide meals to accommodate the provider's enrolled children who have disability-related special dietary needs.*
- Inform families about the meals they will be receiving from the SFSP/SSO agency and confirm with each of them that they are not receiving meals from another SSO/SFSP agency. *(May be done just one time.)* Provide certification to the SFSP/SSO agency that they have made these confirmations.
- Ensure all meals *(including infant meals)* received from the SFSP/SSO agency meet the CACFP Meal Pattern requirements.

The provider cannot claim meals received from the SFSP/SSO agency (ex. breakfast and lunch).

The provider may only claim for their own prepared meals:

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

Completing an agreement between the provider and SFSP/SSO agency is recommended to detail who will provide which meals/snacks, including infant meals. The agreement should outline dates the SFSP/SSO agency is unable to supply meals. It should also specify the SFSP/SSO agency will supply meals that accommodate the provider's enrolled children who have disability-related special dietary needs.

**21. Are providers required to serve meals pre-plated style instead of family-style in order to reduce the spread of COVID-19?**

The CACFP requires providers to follow sanitation and safety guidance issued by State and local health authorities on measures to be taken for reducing COVID-19 exposure. The Department of Children and Families (DCF) provides guidance on this specific topic. Refer to [DCF #19: Updated guidance on child care centers providing care during COVID-19](#), which states not to serve family style meals and to not share 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 child receiving a meal. Refer to [Meal Service Styles: CACFP Requirements](#) for more information on serving pre-plated meals.



### **Meal Pattern Waiver Questions** (Questions 22-28)

Providers must submit a waiver request to their sponsor 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.

**22. Do providers need to submit a waiver request each time they experience unsafe access to or unavailability of a meal component they previously received approval for?**

No. Once the FDCH sponsor has approved a provider's waiver request for a meal component, the provider does not have to submit another waiver request for that same component when experiencing recurrences.

**23. Can the FDCH sponsors approve waiver requests for all meal components at the same time in anticipation of potential unsafe access to or unavailability of foods?**

No. Meal pattern flexibility waivers can only be approved for component(s) of which a provider is currently experiencing issues, and not in anticipation of potential unsafe access to or shortages of multiple components. Additional waiver request(s) will have to be submitted if the provider experiences supply disruptions of foods that credit towards a new meal component(s).

**24. Are providers required to accommodate special dietary needs (SDN) during COVID-19?**

Yes. Providers must still accommodate children with disability-related SDN. USDA does not have the authority to waive this requirement.

**25. Can providers 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.

**26. Are providers 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.

**27. If a provider chooses to supply meals to all family members of their enrolled children, can the Meal Pattern Waiver be used if the provider cannot find enough food for the entire family?**

No. The waiver cannot be used when a provider cannot find enough food to meet the required meal components for serving meals to their enrolled children's entire family. Supplying meals to an entire family is outside the CACFP and cannot be a reason cited for unavailability of foods.

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

Providers are encouraged to reach out to grocery store owners and managers locally to build a relationship. If a grocery store owner or manager is aware of the provider's needs, they may be in a better position to help.

The [Connecting with Your Local Grocery Store](#) handout provides talking points/tips with local grocers.

If providers are still unable to obtain required meal components, they must submit a meal pattern waiver request to their sponsor for approval.



### **Monitoring Questions** (Questions 29-34)

The [DPI Guidance for Completing CACFP FDCH Off-Site Monitoring](#) summarizes the monitoring requirements for FFY 2021. Use this guide for direction on review components, documentation, and discretion within staff monitoring policies and procedures.

**29. When completing home visits by off-site methods, how should the 5-day reconciliation be completed if the provider's childcare were closed and they are serving meals off-site? (DCF attendance records are not required when the provider's operation is closed.)**

Reconcile the provider's meal counts to childcare attendance records by selecting the most recent 5-consecutive day period when the provider was still open and caring for her enrolled children.

**30. Is there flexibility in how monitors complete unannounced off-site home visits?**

Yes. Use DPI's guidance provided within the [DPI Guidance for Completing CACFP FDCH Off-Site Monitoring](#) handout for setting ground rules on what comprises an unannounced visit.

**31. How should FDCH sponsors monitor providers who are using the Non-congregate Feeding and Meal Pattern Flexibility waivers?**

USDA has not issued guidance on how to monitor providers who are using these waivers. The following provides suggestions for monitoring these providers;

- For providers approved for the meal pattern flexibility waiver, check their menus for whether they are consistent with their approved waiver.
- For providers approved for the Non-congregate Feeding waiver:
  - Monitor claims for abnormal patterns (i.e. large # of newly enrolled children, substantial increase in reimbursement)
  - During home visits, assess reasonableness based on the provider's explanation of their process for distributing meals off-site.

*Examples of questions to discuss: how are meals distributed; which kids receive off-site meals; are multiple meals distributed at one time, if so how many; are meals unitized or bulk foods; are meals reasonable for preparation and sanitation; are menus/instructions on storage, preparation, and portions sizes given; are they recording meal counts correctly; obtaining written consent from families receiving delivered meals, etc.)*

If detecting abnormal claiming patterns or have concerns during home visits, review support records, such as:

- Families' written requests/address confirmations for receiving delivered meals
- Provider's plan for meal pick-up
- Check-off sheets of children who have received meals
- Provider's menus to verify that meals claimed seem realistic for off-site distribution  
*(If in question, the sponsor could request more information, like the provider's storage, preparation, and serving instructions being given out with meals to families.)*
- Household contacts

**32. What if the FDCH sponsor falls below the monitoring ratio requirements based on the monitoring ratio information submitted within their FFY 2021 contract renewal?**

FDCH sponsors should not submit updated monitoring ratio information within their FFY 2021 contract unless the time studies supporting the updates were completed prior to COVID-19.



**33. Should staff be completing time studies to document time spent on monitoring tasks while COVID-19 restrictions have limited monitoring activity?**

No. Time study information completed during COVID-19 will most likely not accurately represent the amount of time spent on monitoring tasks during normal operations. Sponsors should hold off completing any time studies until after monitoring activity resumes to a more normal level.

**34. Do FDCH sponsors need to upload their policies and procedures for implementing COVID-19 related changes into the contract for FFY2021?**

No. DPI staff will review these policies and procedures during the administrative reviews that will be completed during FFY 2021 and 2022. However, if the sponsor would like DPI's feedback or technical assistance on their policies and procedures, they may request for input from their assigned consultant.

### **Provider Claims/Reimbursement** (Questions 35-41)

**35. Can providers be reimbursed for more than two meals and one snack or two snacks and one meal per child per day during COVID-19?**

No. The maximum number of meals or snacks that can be claimed for Federal reimbursement per child per day remains the same as under regular CACFP operation.

**36. Can providers be reimbursed for meals served to children over the age of 12 years?**

No. Only children through 12 years can be claimed, **unless** they have a disability that is supported by valid documentation (school's IEP).

**37. What documentation is required from a provider serving meals outside of their regulation limits, in order for the sponsor to pay the provider for these claimed meals?**

Providers must have approved exception requests from their regulators which grant permission to care for these children. They must submit copies of these approved exception requests to their sponsor in order to receive CACFP payment for these children's meals.

**38. New 11/2020 Can a Tier 2 provider be eligible as Tier 1 based on one month's worth of income during COVID-19 due to lower income, even if it doesn't reflect their average yearly income?**

Yes. A Tier 2 provider may submit a completed *Household Size-Income Statement for Establishing Provider's Tier 1 Status* reporting one month's worth of income for re-determination. They must still submit support documentation of their income for verification.

**39. Updated 11/2020 Can a Tier 1 provider (based on census/school data) qualify their own children for meals based on the prior month's income even if it does not reflect their average yearly income?**

Yes. The provider may submit a completed *Household Size-Income Statement for Provider's Own/Residential Foster Children* reporting one month's worth of income for determining whether their own children are eligible.





## FDCH Sponsor CACFP COVID-19 Questions and Answers

40. **Updated 11/2020** Can sponsors inform providers of their re-tiering options when they or the families of their enrolled children may be experiencing changes in household income and/or size during the COVID-19 crisis, which may now qualify them, their own children, or the families of their enrolled children for Tier 1 meal rates?

Yes. Sponsors may inform providers of re-tiering options at any time, as long as no one is singled out or targeted individually.

Providers and families of children enrolled with Tier 2 providers who have experienced reduced income due to COVID-19 may submit a completed *Household Size-Income Statement* reporting one month's worth of income, even if it does not reflect their average yearly income, for re-determining tier eligibility for Tier 1 meal rates.

Household Size-Income Statement determinations are valid for 12 months from the Household Size-Income Statement's Effective Month of Determination.

41. **Will there be any disruptions in CACFP meal reimbursement for provider payments?**

There is currently no change to the DPI claim processing and payment schedule. FDCH Sponsors must continue to pay meal reimbursement claims to providers within 5 days of receiving the funds from DPI.

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### Sponsor Claims/Reimbursement (Questions 42-44)

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42. **Will DPI submit a waiver request to USDA for increasing the 10% limit carryover of administrative funds?**

Yes.

43. **Can FDCH sponsors have an extension to the August 31, 2020, deadline for submitting FFY 2020 budget amendments?**

Sponsors must contact Cari Muggenburg at DPI to request for an extension to the August 31, 2020 deadline for submitting FFY 2020 budget amendments.

44. **Will funds be available to cover FDCH sponsors' administrative costs when administrative reimbursement goes down due to a decrease in submitted claims?**

DPI will continue to pay administrative reimbursement based on the number of **claiming** homes unless we receive additional information from USDA that state otherwise.