



Policy Updates Related to Coronavirus (COVID-19): Early Child Care and Before and After Care Facilities Meal Provision Guidance (Updated May 20, 2020)

Applicable Meals Programs: Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP)

Background

As a part of the District's response to the coronavirus (COVID-19) outbreak in the United States, the Office of the State Superintendent of Education (OSSE) is modifying, updating and re-circulating certain policies.

Scope

This document contains details and policies specifically relating to the **provision of meals to children** by early learning providers and before- and after-care facilities.

Effective Date

This policy took effect May 20, 2020 and will remain in effect until further notice. This policy supersedes the OSSE policy on this topic released on April 27, 2020.

Policy Guidance

In the event of temporary or prolonged closures of early learning programs, early learning providers are not required to feed children. However, the United States Department of Agriculture (USDA) and OSSE encourage early learning providers to consider opportunities to connect children and families with healthy, low or no cost food options.

1) *Child and Adult Care Food Program (CACFP)*

USDA has issued several waivers to support meal service during times of temporary or prolonged closure of CACFP facilities during this national emergency. **Under this guidance, early learning providers and before- and after-care facilities that are currently approved to participate in the CACFP program may be reimbursed for meals served during closures of their facilities.**

CACFP sponsors wishing to serve meals during periods of facility closures should contact their CACFP specialist to receive guidance on updating their 2020 Program application and completing a CACFP Emergency Meals Plan.

2) *Summer Food Service Program*

States are eligible to operate a version of the Summer Food Service Program (SFSP) specifically for natural disasters, pandemics and building closures.

Early learning providers that participated in the SFSP in summer 2019 and 2018 *may* be eligible to participate and be reimbursed for continued meal service if their SFSP sponsor applies and is approved to serve meals during temporary or prolonged closures.

Providers who participated in SFSP in the summer of 2019 and are interested in this opportunity should contact their SFSP sponsor.

3) Refer Families to Approved Meal Service Sites

As meal service operators and sites are approved to serve meals in the event of unanticipated school or early learning program closures, OSSE and our District agency partners will post online lists of locations approved for meal service. Early learning providers are encouraged to share this information with families. Children 18 and younger can receive meals at the locations listed on <https://coronavirus.dc.gov/food>.

Early learning providers may also serve meals without reimbursement from USDA or OSSE, should they have sufficient funding and capacity to do so. Given the risk of transmission of infectious disease in group settings, early learning providers wishing to serve such meals are strongly encouraged to do so in a non-congregate setting (e.g., via grab-and-go).

Questions and Answers

Q1. What happens if schools are closed but my center is open?

A: Centers currently participating in CACFP may continue to operate as usual as long as they are open and receive USDA reimbursement.

Q2. What happens if my center AND schools are closed?

A. If a center and schools are closed, options for providing meals include (1) serving meals in my center in a non-congregate setting with reimbursement from CACFP; (2) referring families to meal service sites across the District; and (3) partnering with an approved SFSP sponsor.

A CACFP site that is closed during the pandemic may become an SFSP site under an SFSP sponsor that has been approved by the State agency. If the sponsor intends to operate the site as an open site and serve the community at large, the site must be located in an eligible area, unless the State agency has approval to waive the area eligibility requirement and has approved the site to operate under the waiver. SFSP sites may only operate during the regular school year in cases of unanticipated school closures, or during breaks for schools operating on a continuous calendar.

Q3. How can my facility apply to implement CACFP waiver options, such as serving non-congregate meals or allowing parent meal pickup?

A. Facilities can elect to implement waiver options by completing the COVID-19 Related Waiver Registration. To receive the waiver registration, contact your assigned CACFP specialist.

Q4. If my center is closed and I am not able to serve non-congregate meals, how do I identify nearby meal service sites to refer my families?

A. Meal locations for children age 18 and younger are listed on <https://coronavirus.dc.gov/food>.

Facilities Operating Under CACFPQ5. Can CACFP sponsoring organizations add new centers and facilities during the COVID-19 emergency?

A: Yes. Sponsoring organizations can add new centers and day care homes that are providing care during the coronavirus pandemic. Before doing so, sponsoring organizations must complete all aspects of the CACFP site application and approval process. Sponsors should consider whether they have the capacity to add centers and facilities based on their systems and other resources, such as the availability of inspections and licensing

Q6. May sponsoring organizations conduct pre-approval reviews off-site for new CACFP centers and day care homes during the coronavirus pandemic?

A: Yes. While sponsoring organizations are still required to conduct pre-approval reviews for new institutions and facilities, FNS granted nationwide waivers of *onsite* monitoring of new facilities for sponsoring organizations. Sponsoring organizations may conduct pre-approval reviews off-site through a desk audi

Q7. Can CACFP sites that remain open implement the non-congregate (grab-and-go meals) and meal time nationwide waivers?

A: Yes. Day care homes and centers that are still open can provide meal service on site to participants in attendance. They can also arrange meal service pick-ups and/or provide meal delivery for participants temporarily not in attendance. **[New] This waiver is in effect through Aug. 31, 2020.**

If the CACFP operator determines there is a need, and it is logistically feasible to implement these options, it can do so for all or part of its participants. Please note that as indicated in SP 14-2020, Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3 (<https://www.fns.usda.gov/cn/covid19/meal-service-during-novel-coronavirus-outbreaks-qas>), CACFP operators may provide meal delivery only to enrolled children and adult participants, due to confidentiality and logistical requirements.

Facilities can elect to implement waiver options by completing the COVID-19 Related Waiver Registration. To receive the waiver registration, contact your assigned CACFP specialist.

Q8. My afterschool/child care facility participates in the CACFP At-Risk. Can I continue to serve meals if my location is closed?

A: Yes. Your facility can serve meals to children age 18 and younger in a non-congregate setting using grab-and-go meals. Your facility is eligible to provide up to one meal and one snack per day per child. According to a recently issued USDA waiver, your facility is not required to offer an enrichment activity. Facilities can elect to implement waiver options by completing the COVID-19 Related Waiver Registration. To receive the waiver registration, contact your assigned CACFP specialist.

Q9. Do CACFP at-risk afterschool centers that are closed and serving meals need to maintain daily attendance records?

A. No. At-risk programs that are closed and serving non-congregate meals do not need to maintain daily attendance records. Facilities must have a plan to maintain accountability and program integrity. This includes putting in place processes to ensure that meals are provided for eligible children, and that they do not distribute duplicate meals.

Q10. Do CACFP child development facilities that are closed and serving meals need to maintain daily attendance records?

A. Yes. CACFP child development facilities that are closed and serving non-congregate meals may only claim meals served to enrolled children. These facilities must continue their standard CACFP attendance and meal counting procedures by maintaining attendance records and by-name meal counts.

Q11. Are facilities serving non-congregate meals required to adhere to CACFP requirements that limit how long a meal service can last and how much time must lapse between different meals?

A. No. Facilities can establish meal times and service lengths that best support non-congregate meal service in a manner that maintains health and safety standards. Facilities can elect to implement waiver options by completing the COVID-19 Related Waiver Registration. To receive the waiver registration, contact your assigned CACFP specialist. **[New] This waiver is in effect through Aug. 31, 2020.**

Q12. Are facilities serving non-congregate meals required to serve meals at pre-approved meal times?

A. Yes. Facilities must serve meals consistent with the start and end times on the program application.

Q13. Who is eligible to receive non-congregate meals from my closed child care facility?

A. All enrolled infants, toddlers, and children may receive meals from the facility. All enrolled children must have a valid and current Income Eligibility Statement on file if the provider intends to claim the children as “free,” “reduced” or “paid” on the monthly claim for reimbursement.

Q14. Do the meals have to meet the meal pattern standards for required components and minimum serving sizes?

A. OSSE strongly encourages and expects institutions to maintain and meet the nutrition standards for each program to the greatest extent possible. If an institution experiences difficulty meeting the meal pattern due to disruptions in the availability of food products resulting from unprecedented impacts of COVID-19, OSSE may waive the requirement that meals meet meal pattern requirements.

Facilities can elect to implement this waiver option by completing the [COVID-19 Related Waiver Registration](#). To receive the waiver registration, contact your assigned CACFP specialist. **[New] Approvals to waive meal pattern requirements remain in effect until June 30, 2020 or the expiration of the federally-declared public health emergency, whichever is earlier.**

Q15. Will meal pattern waivers affect a program operator’s responsibility to make meal modifications for participants with disabilities?

A. During this public health emergency, program operators are not relieved of their obligation to provide meal modifications for participants with disabilities. When planning a non-congregate meal service, program operators should consider how individuals who require meal modifications will be identified and served.

Q16. May more than one day’s worth of meals be distributed at a time under CACFP?

A. Yes. CACFP Institutions may serve up to seven days' worth of meals at a time. One day's worth of meals includes two meals and one snack or two snacks and one meal. Facilities can elect to implement waiver options by completing the [COVID-19 Related Waiver Registration](#). To receive the waiver registration, contact your assigned CACFP specialist. Food safety is of utmost importance, specifically if multiple days' worth of meals are provided. Please reference food safety information in question 31.

Q17. May CACFP operators deliver meals directly to the homes of children or adult participants?

A. Due to confidentiality and logistical requirements, only CACFP operators that provide care for enrolled children and adult participants are allowed to deliver meals directly to the homes of children and adult participants. Facilities that operate only the CACFP At-Risk program may not deliver meals to homes.

If a CACFP operator determines there is a need, and it is logistically feasible to deliver meals directly to homes, it may do so with State agency approval and adherence to all federal confidentiality requirements.

Only meals delivered to enrolled children or adult participants will be reimbursable. Delivery could be completed by mail or delivery service, or hand-delivered by CACFP staff, volunteers, community organizations, or others. Operators should consider their capacity to execute such an approach effectively, including meeting State or local food safety requirements. Operators can elect to implement waiver options by completing the [COVID-19 Related Waiver Registration](#). To receive the waiver registration, contact your assigned CACFP specialist.

Q18. What funding is available for meal delivery?

A. While related expenses, such as postage or delivery service fees, would be considered an allowable administrative cost under the CACFP, there is no additional reimbursement for home delivery or mobile meal delivery. Delivery costs can be paid with non-program funds such as state or local funds, or private donations.

Q19. What are the requirements for initiating home meal delivery for a household?

A. CACFP operators must obtain written consent from households of enrolled children (this could be obtained by email or other electronic means) that the household wants to receive delivered meals. CACFP operators should confirm the household's current contact information to ensure meals are delivered to the correct location.

CACFP operators must protect the confidentiality of children and their households throughout this process. The National School Lunch Act and the Family Educational Rights and Privacy Act (FERPA) do not authorize the release of household contact information for children without first obtaining the written consent of the child's parent or guardian. The first contact about meal delivery with the households of enrolled children, and adult participants, must be made by the CACFP operator. The CACFP operator must notify the household if contact information will be shared with an external organization, for example, a local non-profit that will provide meal delivery. Once the CACFP operator receives written consent from the parent or guardian to release contact information, the information may be shared with other organizations involved with meal delivery.

Q20. Do home-delivered meals need to be shelf-stable?

A. No. The type of meal offered will depend on the resources and capacity of the CACFP operator. Those that are able to prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets state or local food safety requirements may do so.

Q21. Does the child or adult participant need to be present for home meal delivery?

A. No. As long as the CACFP operator has obtained the household's written consent to deliver meals and has verified the current address, the child or adult 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. Please consider

state and local food safety requirements and best practices.

Q22. May CACFP operators provide food items in bulk, either through pick up or home delivery?

A: Yes. CACFP operators may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal.

When implementing such a delivery mechanism, CACFP operators **must** consider the following:

- include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- ensure that food items are clearly identifiable as making up reimbursable meals; and
- provide menus with directions indicating which items are to be used for each meal and the portion sizes;

When implementing such a delivery mechanism, CACFP operators **should** consider the following:

- whether households have access to needed appliances (e.g., refrigerator, stove, microwave) when providing food that requires refrigeration or further preparation, such as reheating; and
- only minimal preparation (e.g., recipes that do not require chopping, mixing, baking) is required.

Facilities can elect to implement this waiver option by completing the [COVID-19 Related Waiver Registration](#). To receive the waiver registration, contact your CACFP specialist.

Q23. Can Head Start programs deliver meals to children enrolled in the home-based program option?

A: No. Head Start programs may only distribute meals to children who were already receiving meals through CACFP or the National School Lunch Program (NSLP). Under the non-congregate waiver, these meals can be provided through a State-approved meal distribution method.

Head Start children who do not normally receive meals under CACFP or NSLP, such as children in the Head Start/Early Head Start home-based program option, can utilize open SFSP or NSLP Seamless Summer Option (SSO) sites in their community to get meals. Meal locations for children age 18 and younger are listed on <https://coronavirus.dc.gov/food>.

Q24. Are there additional food safety measures that should be followed?

A: Yes. All food regardless of delivery or service method should follow proper handling, storing, and heating procedures. Cold food should be delivered below 40 degrees and hot food above 140 degrees. If the item is shelf-stable, it can be delivered at room temperature. See below for additional information regarding food safety.

Q25. If a child care center or day care home continues to provide CACFP meals and snacks during the COVID-19 pandemic, can the facility also be approved to operate as an SFSP site?

A: Yes. CACFP institutions that have developed a separate food service program for children who are not enrolled in their day care homes or centers may be approved to participate as an SFSP site under an SFSP sponsor that has been approved by OSSE.

The CACFP institution must meet SFSP eligibility criteria, ensure that the same children are not served meals in both programs, and keep separate records for each program. To operate as an open SFSP site, the facility must be located in an “area in which poor economic conditions exist,” as defined at 7 CFR 225.2 of SFSP regulations. SFSP sites may only operate during the regular school year in cases of unanticipated school closures, or during breaks for schools operating on a continuous calendar.

Facilities Operating Under Their SFSP Sponsor

*Additional information is available for SFA SFSP sponsors in OSSE's "Policy Updates Related to COVID-19: Current Sponsors of the Summer Food Service Program Meal Provision Guidance"

Q26. If approved by OSSE, what meals can a SFSP sponsor serve?

A. SFSP sponsors can serve up to two meals per day, including breakfast, lunch, supper and an AM or PM snack. Any additional meals will be not reimbursed by the USDA.

Q27. Is a sponsor allowed to operate the SFSP and CACFP At-Risk programs at the same time?

A. Yes. If an institution has an approved application for the SFSP and CACFP At-Risk programs on file with OSSE then the sponsor can provide the same group of children with meals through both programs. For example, a sponsor may serve a breakfast and lunch through SFSP and a supper and snack through CACFP At-Risk.

Q28. Are facilities required to adhere to SFSP requirements that limit how long a meal service can last and how much time must lapse between different meals?

A. No. Facilities can establish meal times and service lengths that best support non-congregate meal service in a manner that maintains health and safety standards. **[New] This waiver is in effect through Aug. 31, 2020.**

Q29. Are facilities required to serve meals at pre-approved meal times?

A. Yes. Facilities must serve meals consistent with the start and end times on the program application.

Q30. Who is eligible to receive meals at approved SFSP locations?

A. Children age 18 and younger are eligible to receive meals at these locations.

For All Facilities

Q31. Do children need to be present to receive a meal served through SFSP or CACFP?

A: No. Meals may be distributed to a parent or guardian to take home to their children. Sponsors must have a plan in place to ensure accurate accountability and program integrity. Plans must include the following:

- A process to ensure that meals are distributed only to parents or guardians of **children age 18 and younger** (*applicable to sponsors operating At-Risk CACFP*)
- A process to ensure that meals are distributed only to parents or guardians of **enrolled children** (*applicable to CACFP full-day child care centers, Family Day Care Homes*)
- A process to ensure that meals are distributed only to parents or guardians of **children age 18 and younger as well as persons over 18 with disabilities as defined in the regulations**; (*applicable to sponsors operating SFSP*)
- A process to ensure that duplicate meals are not distributed to any child.

SFSP and CACFP sponsors must submit their plan when electing to implement the parent pickup waiver by completing the COVID-19 Related Waiver Registration. **[New] This waiver is in effect through Aug. 31, 2020.**

Q32. What health-related considerations should be taken into consideration for all meal programs?

A. Early learning providers, schools, and sponsors should review the guidance provided by the USDA, the Centers for Disease Control and Prevention, and DC Health on proper sanitation and cleaning protocols in response to the COVID-19 virus. In general, to limit additional exposure in the event of a large scale closure,

meal service sites should create a plan to provide meals quickly to children through a grab-and-go style service method and discourage children from congregating at these locations.

Early learning providers that are considering closing must coordinate with OSSE, DOH and DME related to further specific local public health guidance.

For more information, please visit <https://www.fns.usda.gov/disaster/pandemic>.

For resources and additional information on the District of Columbia Government's response to coronavirus (COVID-19), please visit coronavirus.dc.gov.

Q33. Do you need to have "And Justice for All" (AJFA) posters on mobile routes for COVID-19 meal distribution?

A: For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed. The AJFA poster must be prominently displayed in all facilities and locations that distribute program benefits or administer services. Due to COVID-19, if printed 2019 AJFA posters are not available for display, [paper copies](#) may be substituted as necessary, including the use of the 2015 AJFA poster as needed. Meals delivered from stationary vans or buses should display the AJFA poster.

Q34: Where can I get information about other central food distribution locations?

A: Information about food distribution locations can be found at <https://coronavirus.dc.gov/food>. This resource will be updated regularly, so please check back frequently. Information can be found for each program as follows:

- ❑ [\[New\] Pandemic EBT \(P-EBT\)](#)
- ❑ [Meal Delivery for Seniors](#)
- ❑ [Supplemental Nutrition Assistance Program \(SNAP\) and Temporary Assistance for Needy Families \(TANF\)](#)
- ❑ [Women, Infants, and Children](#)

USDA has issued a number of guidance documents recently that extend the waivers for a number of Child Nutrition Programs. The table below identifies the date that select subjects of Child Nutrition Programs are in effect until.

Table 1. Dates Waivers Are In Effect Until for USDA Child Nutrition Program for Select Subjects

USDA Programs	Waiver Subject	Waiver in Effect Until
Child and Adult Care Food Program (CACFP)	Non-congregate feeding	August 31, 2020
	Parent Pick-up	August 31, 2020
	Meal Pattern	June 30, 2020
	Meal Times	August 31, 2020
	Monitoring	June 30, 2020
Seamless Summer Option (SSO)	Non-congregate feeding	August 31, 2020
	Parent Pick-up	August 31, 2020
	Meal Pattern	June 30, 2020

	Meal Times	September 30, 2020
Fresh Fruit and Vegetable Program (FFVP)	FFVP	June 30, 2020
	Parent Pick-up	June 30, 2020
Summer Food Service Program (SFSP)	Non-congregate feeding	August 31, 2020
	Parent Pick-up	August 31, 2020
	Meal Pattern	June 30, 2020
	Meal Times	September 30, 2020
	Monitoring	June 30, 2020
	Closed Enrolled	September 30, 2020
	First Week Site Visit	September 30, 2020

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