

## **Guidance on Non-Congregate Feeding for Child and Adult Day Care During Closure due to a Novel Coronavirus Outbreak**

### **Background**

This guidance is issued pursuant to Governor Scott's directive of a closure period of pre-k through 12 schools and state regulated child care programs in the State of Vermont from March 18, 2020 through April 6, 2020.

USDA issued a nationwide non-congregate feeding waiver on March 20, 2020, to allow child and adult day care centers who are closed to continue to provide meals and snacks to participants using the Child and Adult Care Food Program (CACFP). While the Child Nutrition Programs has requested that USDA waive some meal pattern and monitoring requirements in the CACFP, as of March 21, 2020, none of these waivers has been granted. As a result, all program requirements for the CACFP remain in effect, other than the requirements for non-congregate feeding and enrichment activities in the At-risk After School Meals Program.

### **Purpose**

As a result of the USDA waiver on non-congregate feeding, child care centers, adult day care centers, and at-risk afterschool meals programs may implement the CACFP during COVID-19 in a variety of scenarios. The following guidance is intended to help child care centers, adult day care centers, and at-risk afterschool meals programs plan for multiple scenarios.

### **When a CACFP Sponsor Is Operating to Provide Care for Children of Essential Workers**

Child care centers that are open and providing care to children for Essential Persons during COVID-19 can still serve and claim meals and snacks through the CACFP, as long as the institution currently participates in the CACFP. If new children are enrolled, enrollment and income forms must be on file prior to claiming meals and snacks for these children. If the center is having difficulty following program regulations as a result of COVID-19, please [contact Child Nutrition Programs](#) to request assistance.

Child care centers that are still operational and providing care for Essential Persons, may request from the State agency to implement non-congregate feeding to continue providing meals and snacks for the regularly enrolled children that are not able to continue receiving care during COVID-19. Centers who are continuing to operate to serve essential workers and who also wish to offer non-congregate feeding to serve their regularly enrolled children may operate both options. For instructions on how to provide non-congregate meals to regularly enrolled children, see "[When a Child or Adult Day Care Center is Closed](#)" below.

### **When a Child Care, Adult Day Care Center, or CACFP At-Risk Program is Closed**

Under normal circumstances, when the child care or adult day care center or CACFP At-Risk Program is not in session and the center does not consider the day to be an "operational day," the CACFP may not operate. However, USDA issued a nationwide non-congregate feeding

waiver on March 20, 2020 to allow child and adult day care centers who are closed to continue to provide meals and snacks to participants using the CACFP. USDA has further waived the requirement that enrichment activities take place in the At-Risk After School Meals Program during this time period.

To use CACFP during a center closure, the institution must have an approved CACFP program agreement and application on file with the state. If you currently participate in the CACFP, you already have an approved CACFP program agreement and application on file with the state.

Institutions participating in CACFP who wish to take advantage of the non-congregate feeding waiver must email [Rebecca Cochran](#) on the Child Nutrition Programs team to request the use of non-congregate feeding and must indicate whether grab-and-go, household distribution, or both will be used. Rebecca Cochran will reply back to confirm that the permission to use non-congregate feeding is granted. In addition, the Sponsor must modify their CACFP application packet and resubmit it for approval. Please see [these instructions for how to modify your application packet](#) to accommodate non-congregate feeding due to COVID-19.

## **Alternative Options for Children 18 and under to Continue Receiving Meals during a Center Closure**

207 Vermont Schools are considered Area Eligible. These schools may operate an open meal site to provide meals to any child age 18 and under, at no cost, and all meals served are claimed at the free reimbursement rate. If a child care center has closed and cannot continue to provide meal services to the children enrolled in that child care center, the households can go to an open summer meals site and receive meals for children residing in that household. In addition, if households of enrolled children in care centers have older siblings, we suggest the household reach out to the local school district to receive meals for these siblings. Even if implementing non-congregate feeding, the child care center may only provide meals and snacks to the children enrolled in the center. Households can find their nearest open site by calling 2-1-1 or contacting their local school. We strongly suggest sharing this resource with your households.

## **SFA Sponsors of the At-Risk Afterschool Meals Program**

USDA has further waived the requirement that educational or enrichment activities take place during the At-Risk After School Meals Program during this time period. This means that School Food Authority (SFA) Sponsors of the At-risk Afterschool Meals Program who are already implementing Summer Food Service Program (SFSP)/Seamless Summer Option (SSO) during unanticipated school closure could continue to offer an additional meal and/or snack in the At-Risk Afterschool Meals Program, as long as the same meals are not served on both programs. Schools who currently operate CACFP At-Risk and are using SFSP/SSO to provide meals during the unanticipated closure may operate both programs and use SFSP/SSO to provide Breakfast and Lunch, and CACFP At-Risk to provide Supper and/or Snack. Sponsors may not claim the same meal (for example, lunch and lunch) in both programs. Please be aware that weekend meals in the CACFP are only allowed if the Sponsor regularly operates the CACFP on weekends. This may mean that a school can offer three meals and a snack per day Monday-Friday using both the CACFP and the SFSP/SSO but can only offer two meals per day for Saturday and Sunday using the SFSP/SSO.

## Non-SFA Sponsors of the At-Risk Afterschool Meals Program

USDA has further waived the requirement that educational or enrichment activities take place during the At-Risk After School Meals Program during this time period. Non-SFA Sponsors of the At-Risk Afterschool Meals Program who would like to continue to offer children enrolled in the Program a meal and/or a snack should follow the instructions in [When a Child Care or Adult Day Care Center is Closed](#) to implement this option.

## Adult Day Sponsors of the CACFP

While the nationwide waivers issued by USDA on March 20, 2020 do not specifically mention Adult Day Centers, Child Nutrition Programs is interpreting this flexibility to apply to Adult Day Centers participating in the as well as Child Care Centers. Adult Day Centers participating in the CACFP should follow the instructions in [When a Child Care or Adult Day Care Center is Closed](#) to implement this option.

## Family Child Care Homes under DCH Sponsors

USDA has not issued guidance around whether the non-congregate feeding waiver is applicable to family child care homes. At this time, registered family child care homes in Vermont may not implement non-congregate feeding for enrolled children. If the family child care home is still operational, providing care to children of Essential Workers, they may continue to serve and claim meals and snacks served to enrolled children under CACFP. If new children are enrolled, enrollment and income forms must be on file prior to claiming meals and snacks for these children. Additional guidance on this topic may be issued at a later date.

## General Requirements for Non-Congregate Feeding in the CACFP

The following guidelines must be followed when implementing this option.

- Follow normal counting and claiming methods. If the Sponsor claims by eligibility percentages, a count is taken when a meal or snack is received and does not need to be taken by participant name. If the Sponsor claims by participant eligibility, a count by name must be taken. All meals and snacks will be reimbursed using the CACFP reimbursement rates based on the free, reduced, or paid status.
- Meals must still be counted at the point of service. This means that either a food service staff member, trained staff member, or volunteer must check off or indicate a meal was provided to a participant. Counting meals prepared or meals not served is not an acceptable counting method. Point of Service Meal Counts must be taken at the time of pick-up when meals are offered for pick-up/grab-and-go and at the time of delivery when meals are delivered directly to households.
- All meals and snacks must be unitized. A unitized meal or snack must include all the required components for the meal type in the minimum quantities specified by the meal pattern. This includes the delivery of **required milk type and/or infant formula** with these meals and snacks. Family style meal service would not be an allowable meal service method to use in these circumstances. The Sponsor must make an application adjustment to change the meal service type within the site application if their current

meal service method is not unitized. The application will need to be saved and re-submitted for approval.

- Follow the [CACFP Meal Pattern](#). All meals and snacks served must still meet meal pattern requirements. Please notify Rebecca Cochran if you are having difficulty following the meal pattern to request further guidance.
- The Sponsor may distribute multiple meals at one time. All Sponsors utilizing the non-congregate feeding option may distribute one days' worth of meals and snacks at a time (up to one breakfast, one lunch, and one snack). If the Sponsor would like to distribute multiple days' worth of meals and snacks at one time, they must let the State agency know via email what their plan is to ensure that the number of meals will be limited to the number allowed (i.e., 5 breakfast, 5 lunches, and 5 snacks per child per 5-day period). The Sponsor may only deliver meals for multiple days, up to one week at a time.
- At this time, weekend meals are only permitted if the center regularly operates the CACFP on weekend days.
- The Sponsor must ensure food safety concerns are addressed by labeling perishable items with an expiration date. When meals are delivered, or multiple meals are provided at one time, they should be made up of non-perishable items, or packed with ice or an ice substitute.
- The Sponsors must follow the [Vermont Food Code](#) and any additional requirements implemented by the Vermont Department of Health to limit the spread of disease.
- The USDA "And Justice For All" non-discrimination poster should be posted at distribution locations. Additional posters may be requested from Vermont Child Nutrition Programs.
- All other requirements for CACFP under [7 CFR 226.6](#) remain in effect.

## **Logistics of Grab-and-Go Non-Congregate Feeding**

For some Sponsors, it may make more sense to have participants pick-up meals at the center location. Here are some tips for setting this up successfully:

- Carefully choose the distribution location. This may be the center lobby, or even outside. Avoid locations that will be difficult to find or require people to wait close together in enclosed spaces.
- Post clear signage, including where to park, where to pick-up the meals, and any special social distancing measures that you are asking people to take.
- Set up the site to require as little personal interaction as possible, maximize space between staff and recipients (aim for at least 6'), and reduce the number of items that multiple people will touch.
- If it is not possible to keep a 6' distance between staff and recipients, provide staff who will be handing meals to recipients with Personal Protective Equipment (PPE) and training on how to avoid exposing themselves or others.
- Try to have household groups in line keep 6' buffer from each other. Tape lines on floor to show 6' distance.

- Make sure alcohol-based hand sanitizer is available for customers to use, especially if there is no soap and water.
- Be sure to clean and sanitize any objects or surfaces individuals may touch, including restroom surfaces, menus, condiments, etc.
- Regularly [sanitize](#) door handles and other high touch areas.
- Operate the site at set hours, as described in your site application.

## Logistics of Home Delivery

Sponsors have asked whether they may deliver meals to enrolled participants directly, by using staff or volunteers. This is not a method that USDA has provided any guidance on at this time for CACFP, so this guidance may change as a result of future USDA guidance. Below are the general guidelines to follow when distributing meals to households:

- Sponsors must first obtain written consent from households of enrolled children or older adults (this could include email or other electronic means) that the household wants to receive delivered meals. Provide a number or email address that households may call to request a delivery. In addition, Sponsors should confirm the household's current contact information and the number of eligible children or older adults to ensure the correct number of meals are delivered to the correct location.
- The Sponsor could offer home delivery upon request from the household. This could be in conjunction with a grab-and-go site, or as the only method of distribution. Record the number of participants that meals and snacks are provided for.
- If it is not possible to keep a 6' distance between delivery personnel and recipients, provide delivery personnel who will be providing meals to recipients with Personal Protective Equipment (PPE) if available and training on how to avoid exposing themselves or others.
- If offering perishable items, use hot boxes or coolers to keep hot foods hot and cold foods cold. Regularly take temperatures to ensure foods are maintained at the correct temperature.
- Volunteers or community resources might be used to provide home delivery services. Record any volunteer hours worked and volunteer miles driven for possible later federal or state funding claims.
- To ensure that meals are consumed by children enrolled in the center's program, when meals are delivered, they should include a notice that the meals are intended for consumption of the children enrolled in the center's program. This notice should also include the full [USDA non-discrimination statement](#).