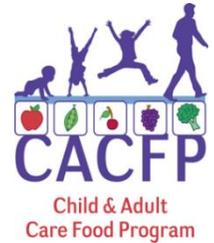




North Carolina Department of Health and Human Services
Division of Public Health, Women and Children's Health
Child and Adult Care Food Program



COVID-19 Frequently Asked Questions

Last Updated: April 2, 2020

CHILD CARE LICENSING REQUIREMENTS

Question

If a parent needs school age care and the child is not currently enrolled in a nearby childcare program, is the program allowed to accept children if doing so causes them to go over their license capacity?

Example: home provider cannot care for more than 5 preschoolers and 3 school aged children.

Answer

This is a question for the Institution's local licensing representatives.

FOOD SHORTAGES

Question

Childcare facilities are experiencing shortages in specific meal pattern food components, including skim or fat milk, whole grains, and more. What should Institutions do?

Answer

Institutions are encouraged to provide what they can and document what they cannot purchase due to shortages. The State agency has been granted flexibly to support the provision of meals, with or without milk, in emergency situations. When emergency conditions prevent an Institution or facility normally having a supply of milk from temporarily obtaining milk deliveries, the State agency may approve the service of breakfast, lunches, or suppers without milk during the emergency period.

Additionally, a nationwide waiver to allow meal pattern flexibility in the Child Nutrition Programs was issued on March 25, 2020. See information below regarding available waivers.

[NEW] Question

[Institution] has a surplus of food that was purchased to feed children that will expire at some point. What should [Institution] do? Is the loss reimbursable? Can the food be donated? If so, to who?

Answer

Institutions should contact their local foodbank to see if they can use the inventory of food. CACFP reimbursement is based on meals times rates, so you will not be reimbursed for that loss.

[NEW] Question

The Institution is currently closed. However, there is an apartment complex that has a grab and go site down the street. The Institution wants to contribute food to the apartment complex, is that allowable and reimbursable?

Answer

The Institution should contact the local foodbank to see if their inventory is needed. However, CACFP reimbursement continues to be based on the number of meals served times the reimbursement rate.

INSTITUTION MONITORING REQUIREMENTS

Question

What are the parameters or requirements of a desk review? How does an Institution conduct a desk review?

Answer

The State agency put out guidance on Friday, March 20, 2020² about how to conduct a desk review in lieu of on-site monitoring. The written procedures are available at <https://www.nutritionnc.com/snp/forms.htm> under CACFP Forms Fiscal Year 2020.

[UPDATED] Question

Does a desk review count as one of the two non-meal service reviews?

Answer

A desk review may count for one of the two required monitoring visits that do not require a meal service observation. If the Institution has applied for the Sponsoring Organization Monitoring waiver, Sponsoring Organizations are required to:

- Conduct two monitoring visits this fiscal year;
- For the Sponsor's current review year, only one of the two visits are required to be unannounced;
- The requirement of on-site meal service observation has been waived;
- The time between monitoring visits may exceed six months; and
- Sponsors may conduct desk reviews in lieu of on-site pre-operational visits and the first four week visit.

[UPDATED] Question

Are Institutions able to skip pre-operational visits for newly licensed facilities and conduct training over the phone?

Answer

Institutions may conduct the pre-operational visit and first four week visits as desk reviews.

[NEW] Question

If facilities are closed, do sponsors get any flexibility in conducting desk reviews?

Answer

USDA issued guidance on Friday, March 27, 2020 allowing Sponsoring Organizations the following flexibilities:

- FNS waives the requirement at 7 CFR 226.16(d)(4)(iii) that sponsoring organizations review each CACFP facility three times each year. **For a sponsor's current review year, CACFP sponsors may conduct two reviews of their CACFP facilities.**
- FNS waives the requirement at 7 CFR 226.16(d)(4)(iii)(A) that at least two of the three reviews must be unannounced. **For a sponsor's current review year, only one CACFP facility review is required to be unannounced.**
- FNS waives the requirement at 7 CFR 226.16(d)(4)(iii)(B) that at least one unannounced review must include observation of a meal service.
- FNS waives the requirement at 7 CFR 226.16(d)(4)(iii)(D) that not more than six months may elapse between reviews.
- FNS does not waive the requirement at CFR 226.16(d)(4)(iii)(C) that at least one review must be made during each new facility's first four weeks of Program operations but **allows sponsoring organizations to review new CACFP facilities as a desk audit.**

RECORDKEEPING

Question

Should Institutions continue completing meal counts and turning in menus during this time?

Answer

Yes, providers should continue to comply with all recordkeeping requirements. Institutions should document when certain meal components are not available due to food shortages.

[NEW] Question

The [Institution] is closed but they are doing a grab and go meal, using the meal count reporting tool. Is the [Institution] to use the meal count by name?

Answer

Yes, meals should be recorded at the point of service by name.

[NEW] Question

[Institution] is currently closed for regular children. The childcare is open for first responders. Is all of the required paperwork needed to get reimbursed for the meals served?

Answer

Yes, newly enrolled children will need income eligibility applications and enrollment forms in order for their meals to be reimbursable.

[NEW] Question

Head start programs serve children up to 12 years of age. Can [Institution] serve children up to 12 years of age if they are not part of the Institution?

Answer

The children would need to have enrollment forms in order to be claimed for reimbursement. Head start children are categorically eligible for free meals so income eligibility applications are not required.

[NEW] Question

Are staff meals reimbursable?

Answer

The meals are not reimbursable, but the cost of ingredients used to make staff meals may be included in the Institution's cost documentation.

[NEW] Question

If Institutions pack three meals for the week, do they need to provide menus for parents to take home?

Answer

Yes, menus need to be maintained to support claims for reimbursement. Menus should also be sent home with non-congregate meals, along with any reheating or storage instructions.

[NEW] Question

Please clarify: if Institutions are using the (weekly) meal reporting form, are typical/agency forms for recordkeeping required as well? Is that (weekly) form printable once completed? Is that form sufficient for reimbursement?

Answer

No, the weekly meal count report allows the State agency to report back to the Governor's office, the Emergency Operations Center team, and federal partners at USDA to help identify gaps in service across the state as well as learn how well our efforts at feeding kids are going.

Institutions need to continue to keep point of service meals count by name and daily attendance records for their monthly claims for reimbursement.

[NEW] Question

If two programs have lower enrollment than usual, can they be combined into one facility? How do they document enrollment?

Answer

If combining the centers won't put the center over their licensed capacity, this is allowed. The Institution would need to have the transferred children's families complete new income eligibility applications and enrollment forms. If an Institution is combining sponsored facilities, they must let their regional consultant know so that the change can be made in NCCARES.

[NEW] Question

[Institution] has been approached by a partner agency trying to find meals for their senior clients. The facility is not currently sponsored and may just be a temporary facility during this current Covid-19 crisis.

[Institution] realizes that income eligibility would still be factor but would [Institution] be able to add this facility as a temporary facility to provide meals for these seniors, without requesting the normal set of documentation or would [Institution] need to add them on our application as a new facility and gather the necessary documents?

Answer

Eligibility requirements for participants in the adult day care center program still apply. Eligibility requirements may be found at <https://fns-prod.azureedge.net/sites/default/files/CACFPAdult%20DayCareHandbook.pdf>. CACFP is meant to supplement existing food service programs, so that would be a determining factor in whether the facility could be added to the sponsorship.

Sponsors must collect all required records to add a new facility. Pre-operational and first four week visits are still required as well, although they may be conducted as desk reviews.

[NEW] Question

[Institution] is on the food program. Because the local school system is not using all the meals they prepare for their students, a considerable amount of meals are left over. Can [Institution] utilize the school program food program and get our meals from them for our children?

Answer

Yes, but those meals may not be claimed for reimbursement since the center is required to provide all components or all but one component for meals to be claimed.

TRAINING

Question

What is the plan of action for the CACFP as far as trainings for this fiscal year? Can Institutions conduct virtual training for their centers and homes?

Answer

It is too early to waive certain program requirements for the fiscal year. Institutions would need to revise their training plans to tell the State agency how they are going to document required training, address questions, assess understanding, and follow-up with poor performers.

WAIVER REQUESTS

[UPDATED] Question

[INSTITUTION] has received notification from the Office of Head Start regarding flexibility in providing meals and snacks during center closures. Head Start and Early Head Start programs may provide meals and snacks to children during center closures. The U.S. Department of Agriculture (USDA) has waived its group setting meal requirement for closed schools and authorized special flexibilities for many states. Could the State agency provide us with additional guidance regarding these waivers and how the meals and snacks are to be distributed to children?

Answer

No waivers were approved for the Child and Adult Day Care Food Program (CACFP) until Wednesday, March 18, 2020 when the President signed HR6201, the Families First Coronavirus Response Act. Any flexibilities available prior to the bill signing were for the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO) under the National School Lunch Program (NSLP).

The State agency has implemented the following flexibility:

- **Fluid Milk Requirement:** when emergency conditions prevent an Institution or facility normally having a supply of milk from temporarily obtaining milk deliveries, the State agency is approving the service of breakfasts, lunches, or suppers without milk during the emergency period.

[Seven nationwide waivers](#) were included under the Families First Coronavirus Response Act:

- Nationwide waiver of congregate feeding requirement through June 30, 2020 or upon expiration of the federally declared public health emergency
- Nationwide waiver of meal service times requirement through June 30, 2020, or upon expiration of the federally declared public health emergency, including suspension of meal service times

- Nationwide waiver of the activity requirement in At-Risk Afterschool Meals (ARAM) program through June 30, 2020 or upon expiration of the federally declared public health emergency
- Nationwide waiver to allow meal pattern flexibility in the Child and Adult Care Food Program. The waiver is in effect until April 30, 2020 or until expiration of the federally declared public health emergency, whichever is earlier
- Nationwide waiver to allow parents and guardians to pick up meals for their children. The waiver is in effect until June 30, 2020 or until expiration of the federally declared public health emergency
- Nationwide waiver to waive on-site monitoring for sponsoring organizations and additional monitoring flexibilities. The waiver is in effect until June 30, 2020 or until expiration of the federally declared public health emergency
- Nationwide waiver of 60-day claim reporting requirement for January 2020 and February 2020. Deadlines for these two claim months are extended for 30 calendar days from their original required date of submission.

In order to request to utilize any of the above waivers, please complete this [WAIVER REQUEST FORM](#).

The State agency has request guidance from the Southeast Regional Office (SERO) of Food and Nutrition Service (FNS), USDA on how to operationalize the nationwide waivers. No guidance has been provided to date.

The State agency has [requested the following waivers](#) (none of which are approved as of March 24, 2020):

- Waiver of Requirement for Sponsoring Organizations to Disburse Funds within 5 Days
- Waiver to Classify all CACFP Participants as Categorically Eligible for Free Meals

[UPDATED] Question

Can Institutions provide shelf-stable lunches and/or breakfasts for five days at the beginning of the week? Can at-risk afterschool meals (ARAM) programs provide meals on weekends as well?

Answer

The State agency has requested guidance from the Southeast Regional Office (SERO) of Food and Nutrition Service (FNS), USDA on how to operationalize the non-congregate feeding waiver, including how many meals may be distributed through a grab and go or delivery set up.

As of now, the limit is 5 days of meals and/or snacks distributed at one time.

At-Risk Afterschool Meals (ARAM) programs may serve up to one main meal and a supplement or two supplements during the week and on the weekends. **CACFP and the Summer Food Service Program (SFSP)/Seamless Summer Option (SSO) MAY be operated at a site simultaneously with State agency approval. Additional guidance on this is forthcoming.**

Questions about the CACFP, including ARAM, should be directed to Karen Lainez Rubi of the Special Nutrition Programs office at the Department of Health and Human Services at karen.lainezrubi@dhhs.nc.gov.

Questions about After School Snack Program under the National School Lunch Program should be directed to Karla Wheeler at the Department of Public Instruction at karla.wheeler@dpi.nc.gov.

Questions about the Summer Food Service Program and/or the Seamless Summer Option should be directed to Cynthia Ervin at the Department of Public Instruction at Cynthia.ervin@dpi.nc.gov.

Question

Can Institutions serve meals using drive-up service for families to take the meals back to their home? Institutions are still open for working families, but other families have been asking if they can get the usual meals and not be in official attendance?

Answer

Yes, Institutions may serve grab and go meals to enrolled participants not in attendance. Institutions should continue to document point of service meal counts.

Question

Can this be extended to the larger community for all children 1-18?

Answer

Grab and go meals may not be extended to the larger community unless the children enroll in the child care program (typically limited to ages 12 and younger) through the CACFP. The larger community 0-18 should be directed to a Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) in the area.

[NEW] Question

Is CACFP allowing Institutions to be reimbursed for continuation wages and salaries paid to nutrition workers who under are paid 100% with CACFP funds. Many federal agencies, such as Head Start, are expecting Institutions to pay the wages of workers at the amount they normally make. If so, how do Institutions seek that reimbursement?

Answer

CACFP reimbursement is based on the number of meals served times the reimbursement rate. If meals are being served, a portion of that reimbursement may be used for operational/administrative labor.

[NEW] Question

Are sponsors required to fill out a waiver for facilities who were not able to meet the meal pattern due to milk shortage? Or are they covered by the email sent out offering the Immediate Availability of CACFP Flexibilities.

Answer

No, if the only component missing is milk, the meals are covered by the fluid milk flexibility.

[NEW] Question

Are the waivers effective the date of the waiver or the date of approval?

Answer

The waivers are effective from the date of waiver issuance by USDA.

[NEW] Question

Where do Institutions apply for the waivers?

Answer

In order to request to utilize any of the waivers, please complete this **WAIVER REQUEST FORM**.

[NEW] Question

If Institutions do not have any disruptions in service, do they have to complete waiver forms?

Answer

No.

[NEW] Question

Is there a time lapse for approving waivers?

Answer

State agency staff are approving most waivers within 48 hours if the requests are complete and provide sufficient information.

[NEW] Question

If the Institution contacts parents and makes grab and go bags and the parents don't come, can the Institution claim the meals if the meals are not picked up?

Answer

No, CACFP reimbursement continues to be based on the number of meals served to participants times the reimbursement rates.

[NEW] Question

If waivers are not needed and [Institution] submits our reimbursement, will the reimbursement be delayed?

Answer

The State agency has 45 days to pay an Institution's reimbursement once submitted. However, the State agency does not anticipate delays in reimbursement at this time.

[NEW] Question

What documentation is needed to justify milk not being served at meals and snacks?

Answer

Institutions do not need to do anything to justify not serving milk during the COVID-19 pandemic. The State agency notified Institutions of the ability to exercise the flexibility to serve meals and snacks without fluid milk if fluid milk is not available. Menus should note that milk was not served.

[NEW] Question

Can Institutions provide meals that need to be refrigerated or do meals have to be shelf stable?

Answer

No guidance has been issued to require meals and snacks served in a non-congregate setting be shelf stable at this time.

[NEW] Question

To submit a waiver, does the Institution copy it to letterhead and get a signature from an authorized representative?

Answer

No, Institutions should complete the WAIVER REQUEST FORM.

[NEW] Question

Do grab and go meals have to be cooked?

Answer

No guidance has been issued to require meals and snacks served in a non-congregate setting be cooked at this time. However, USDA has emphasized maintaining appeal and nutrition content of meals and snacks during this time to the extent practicable. Sending home raw ingredients may also make preparation of a meal or snack for one participant difficult for a family.

[NEW] Question

Can Institutions send cans of beans or vegetables in the grab and go?

Answer

Institutions need to be able to demonstrate that meals and snacks served during this time meet minimum portion size requirements. If the can is intended to be used for several days' worth of lunches, that information must be documented appropriately. The menu should reflect several days' worth of beans or vegetables (based on whatever components are being given out). USDA has emphasized maintaining appeal and nutrition content of meals and snacks during this time to the extent practicable. Sending home ingredients may also make preparation of a meal or snack for one participant difficult for a family.

[NEW] Question

Does the non-congregate meal waiver limit a center or home to providing picked up meals to only 'one day at a time'? Can a provider give out meals for two or three days at a time? What is the limit?

Answer

The State agency has not received any written guidance from USDA as to a limit on the number of grab and go or delivery meals that can be given out at one time. The State agency has limited distribution to five days' worth of meals at one time to ensure food safety is maintained.

[NEW] Question

Are the waivers valid for Adult Day Care shelf-stable food boxes?

Answer

Yes, if the adult day care applies for the non-congregate feeding waiver and the meal service times waiver.

[NEW] Question

Does the non-congregate feeding waiver apply to family day care homes? Does this mean that a parent/guardian can come to the day care home that their child is enrolled in and pick up meals/plates (Grab and Go) that are prepared and take them home and feed the children? Can the provider get reimbursed for that meal?

Answer

Yes, if approved for the non-congregate feeding waiver, the parent/guardian waiver, and the meal service times waiver, the parent or guardian may pick up meals and snacks for their child and the provider may claim those meals for reimbursement.

[NEW] Question

Will there be guidance on whether or not all providers are paid at the Tier 1 rate?

Answer

The State agency has not received any communications or guidance regarding Tier I reimbursement to date.

[NEW] Question

Infant families rely on formula. Is there any way Institutions could provide formula, infant cereal, the infant meal pattern for families while they are at home?

Answer

The State agency is seeking guidance from USDA about the allowability of grab and go infant meals. Until that guidance is received the State agency's position is that, if an Institution can document how the infant meal pattern is being met for that enrolled participant, the meal(s) can be provided, documented and claimed.