



## QUESTIONS & ANSWERS

From the Meals on Wheels America Town Hall on March 17, 2020

March 31, 2020

### **Can temporary permission be given to allow congregate meals to be served in non-congregate settings in lieu of centers closing?**

Yes, [ACL has provided FAQs and Tip sheets](#) to help in this area.

### **Are FedEx, UPS, ride-share, and other delivery methods options for delivery to supplement paid staff and/or volunteer drivers? If so, can we use emergency funds to cover them?**

Yes, flexibility is encouraged, especially during these times.

### **Is ACL in contact with the leading nutrition companies to ascertain their current supply of shelf-stable or frozen meals and share this information with local nutrition programs?**

ACL has reached out to a number of leading nutrition companies, as well as FEMA, for initial discussions.

### **Since it is a national emergency, will some nutrition requirements be waived? For instance, I am concerned about shelf-stable meals not being approved for C1 funding because of Nutrition standards.**

Under current Older Americans Act legislation, ACL cannot waive C nutrition specific requirements. However, early guidance was provided by ACL on ways to accomplish serving seniors within regulations. Furthermore, more legislation and guidance will be given as the emergency continues. Also, significant amounts of funding and flexibility are being provided to permit the purchase of shelf-stable meals through the supplemental/emergency appropriations.

### **Are Meals on Wheels programs an essential service under the Presidential emergency declaration?**

The determination of which programs are classified as “essential services” is a state and local decision made in consultation with the State Emergency Management Agency and the Governor’s office.

### **How can local programs access funds set aside for emergency food assistance to seniors and will these dollars be restricted?**

Supplemental/emergency appropriations are being provided to each State Unit on Aging for allocation to local nutrition service providers. If this is referring to FEMA or USDA, this is a state or local determination.

### **Will the existing voluntary contribution policy remain in effect even if client is converted from congregate to home-delivered?**

Under the Older Americans Act for both C1 and C2, voluntary contributions are encouraged, and the law indicates that it should be done in a non-coercive manner. It is state/local decision on how to implement this.

### **How will ACL monitor to avoid price gouging whether for shelf stable or frozen meals or for new home-delivered meal clients?**

The Aging and Disability Networks, with whom ACL works closely, are in a good position to provide ACL with that type of information. We encourage reporting of such instances which can be passed on to the Attorney General.

### **How do we ensure the Meal on Wheels Program continues through this period of increased health concern/social distancing?**

Your plan may need to be altered and updated throughout this changing crisis. ACL has and will continue to work with the Nutrition Resource Center to provide FAQs and Tip Sheets to help you during this time. Also the practices and experiences from other states and communities can be listed on the Listserv from the Nutrition Resource Center to provide information and ideas for you to consider.

### **Some meal providers are hesitant to let individuals take the meal home. For those who do not want to go into the congregate site to eat, can they take the meal home whether hot, frozen, or shelf-stable without penalty (financial or otherwise) to the program?**

At this point, most states have required social distancing. All meals served outside of a congregate site can be counted as home-delivered meals. In fact, we are seeing quite a few innovative approaches, including “grab and go” and “drive-through” meals being provided for consumption at home.

### **How will a congregate meal client be billed for home-delivered meals?**

The program is not an entitlement, and it is also not a means-tested program. Participants are given the **opportunity to voluntarily contribute** toward the cost of the meals, but they cannot be denied service because they cannot or will not contribute. Local projects can encourage contributions as long as it is done in a non-coercive manner.

### **Does the Presidential emergency order allow the National Guard to assist in activities like meal delivery across the nation, as was done in New Rochelle, NY?**

It is our understanding that state governors choose to activate the National Guard. You should work with your State Emergency Management Agency and your governor’s office to ensure they are aware of the needs for your local program.

### **Who are the largest suppliers of shelf stable meals that ACL has a relationship with—will ACL work with other government agencies and the military to ensure an adequate supply?**

HHS is working in close coordination with FEMA to provide sufficient meal supplies across the Nation.

**ACL is working with the national nutrition services organizations, n4a, and ADvancing States as well as with FEMA and USDA to explore the capacities of meals suppliers to assist the aging services network during this crisis. Senior nutrition programs will have increased costs around safety/prevention (buying supplies, protective materials, etc.)—how should this be billed for reimbursement?**

If the supplies, protective materials, and equipment are purchased to provide direct service, these costs are allowable costs to the service for the federal grant.

However, contracts and grant agreements with different providers vary throughout the Nation, so providers should contact their AAA(s) or SUA to discuss options for reimbursement of these increased costs. During these engagements, nutrition program personnel could discuss a change in reimbursement rates, or change in expenses allowed to be reimbursed from the contract or grant, etc.

**Is there going to be a mechanism to reimburse for waste due to unplanned closures and unpredictable serving levels?**

ACL recommends rotating products to ensure the freshest will be available last. For example, shelf-stable meals have a long lifespan, so the first meals purchased should be the first ones provided to older adults in our communities. That also allows meal providers to maximize preparedness for the long-term. For information on the lifespan of frozen meals, please contact your State or local Health Department, or the [USDA's website](#) for further guidance.

Additionally, the FDA has a website that addresses food waste and how to maintain food safety. It is located at <https://www.fda.gov/food/consumers/how-cut-food-waste-and-maintain-food-safety>. Another federal resource is an application called the FoodKeeper, which helps people understand food and beverage storage. It will help people maximize the freshness and quality of their food items. This app can be accessed at <https://www.foodsafety.gov/keep-food-safe/foodkeeper-app>.

**Does the federal government have a food-sourcing back-up plan if we have the funds but cannot source the food we need?**

ACL is having conversations with other Federal agencies and others to advocate for senior meals. It is critical that state and locals also continue to address this as well.