



# To-Go Meals Guidance

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August 29, 2023



# Agenda

- ACL's proposed update to the OAA - Title IIIC
- Current guidance for OCNP To-Go meals
- Considerations for accommodating To-Go meals
- Q & A

# ACL's Proposed Update to the OAA

- ACL announced proposed update to the Older Americans Act (OAA) regulations.
  - First substantial update to the OAA since 1988.
  - Comment period ended August 15<sup>th</sup>.
- Proposed update addresses "Grab and Go" meals.
  - Proposed language to allow for continuation of "grab and go" meals provided under the Congregate Meals program.



# ACL's Proposed Update to the OAA - Title III C-1

## Congregate Meals (C-1)

- Meals are consumed while congregating virtually or in-person, except where:
  - If included as part of an approved State Plan and Area Plan or amendment and to complement the congregate program, shelf stable, pick-up, carry-out, drive-through or similar meals may be provided under Title III C-1;
  - Not to exceed 20% of the funds expended by a AAA or SUA under Title III C-1;
  - Provided to complement the Title III C-1 program:
    - During disaster or emergency situation
    - To older individuals with an occasional need
    - To older individuals with a regular need based on an individualized assessment

# ACL's Proposed Update to the OAA - Title III C-2

## Home-Delivered Meals (C-2)

- Meals are consumed at an individual's residence or otherwise outside of a congregate setting.
- May be provided via home delivery, pick-up, carry-out, drive-through, or other service.
- Eligibility considerations may include:
  - ability to leave home unassisted
  - ability to shop for and prepare nutritious meals
  - degree of disability
  - social and economic need
- Providers may encourage participants to attend congregate meal sites and other health and wellness activities, based on a person-centered approach and local service availability.

# Current Guidance for OCNP To-Go Meals

- Current guidance stands until OAA is officially updated and CDA policies regarding To-Go meals are updated.
- Our goals today:
  - Inform – Provide the intent, definitions, and guidelines for To-Go meals
  - Empower – Support AAAs in making decisions about specific scenarios.
  - Simplify – So AAAs can easily determine what is a C-1 meal vs a C-2 meal.



# Intent for To-Go Meals

Offering To-Go meals allows for the continuation of an effective service delivery model utilized during the pandemic.

The intent for To-Go meals post-pandemic is to:

- ✓ Complement, but not take the place of, in-person dining at the Congregate Meal Program
- ✓ Align with a person-centered model of service
  - Promote choice in dining environment, service style, meal content
  - Tailor service delivery to individual's needs and preferences
  - Treat individuals with dignity and respect

# Application of To-Go Meals

## **Clients unable to attend in-person dining**

- Uncomfortable dining in a group setting
- Works during mealtime

## **Clients who have a need for extra meals**

- Identified at high nutritional risk on Determine Checklist
- Identified risk of food insecurity

## **Client preference**

- Attends senior center activity and requests meal to-go
- Preference for combination of dine-in and To-Go meals

## **Anticipated need for emergency meals**

- Weather-related emergency
- Fire season



# Current Guidance - Definitions

The definitions of C-1 and C-2 are the foundation for current guidance for To-Go meals.

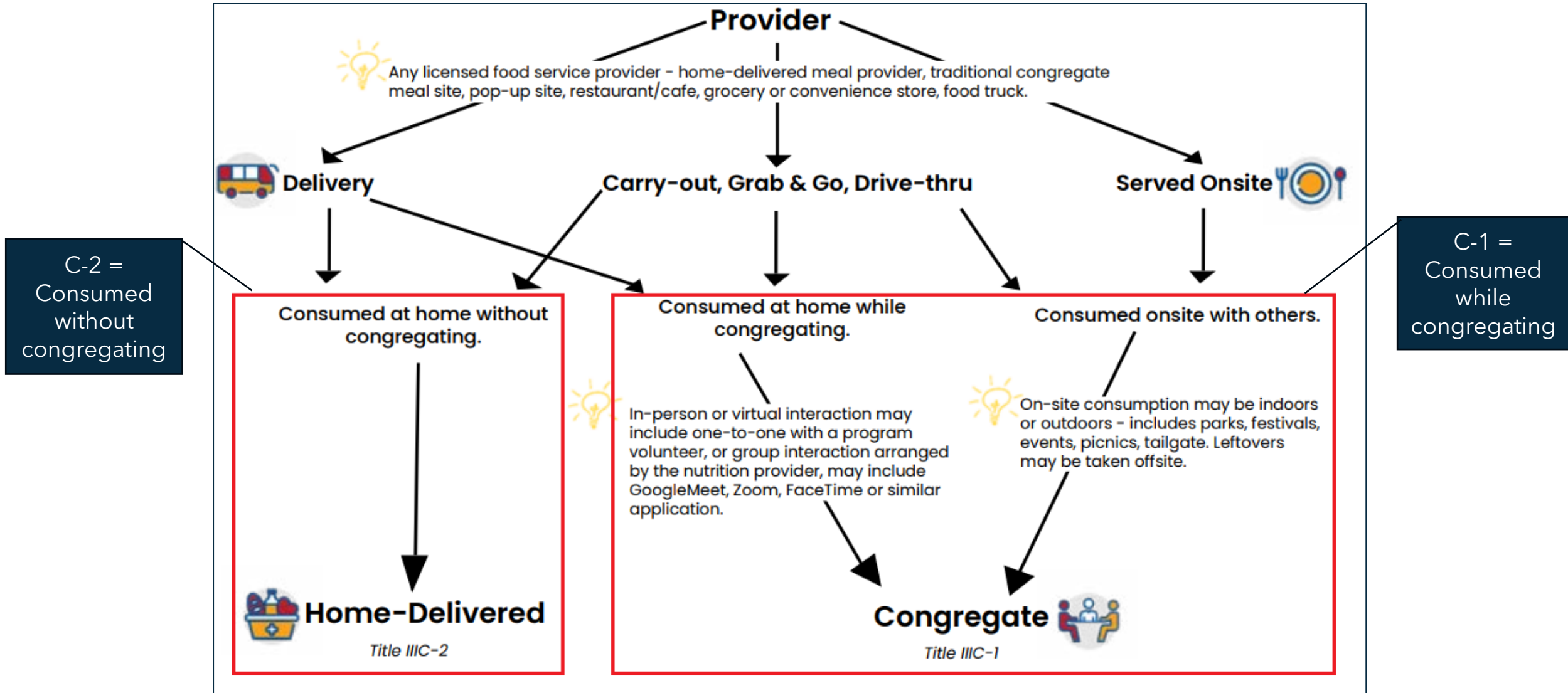
## **Congregate Meal:**

- A meal provided by a qualified nutrition project provider to a qualified individual in a *congregate or group setting*.

## **Home-Delivered Meal:**

- A meal provided to a qualified individual in his/her place of residence.

# Title III C-1/C-2 Service Delivery Decision Tree



# Current Guidance: C-1

## C-1 Criteria

- Meal consumed in a congregate setting

**OR**

- Consumed offsite with in-person or virtual congregating with the meal

## Examples

- C-1 meal consumed...
- in congregate setting (senior center, park, restaurants, etc.)
  - offsite and live virtual event is provided at mealtime
  - offsite with phone call with program volunteer at mealtime

## Requirements

- Virtual activity is a live event arranged by the provider (e.g., group chat, nutrition education, virtual tour)
- A virtual activity is provided for each C-1 To-Go meal
- Provider is no longer required to track client confirmation of intent to join virtual activity

# Common Questions: C-1

**1. Is a virtual activity required with each To-Go meal for the meal to be considered C-1?**

Yes, the provider must provide a virtual activity for each C-1 meal since the definition of a C-1 meal is “a meal provided ... in a congregate or group setting”. Meals without a virtual activity are considered C-2 meals.

**2. Can a list of virtual programs be provided to clients instead of offering a live virtual activity?**

Providing a list of virtual programs would not meet the C-1 requirement for congregating during the meal. A virtual activity would need to be a live event arranged by the provider.

**3. Would a To-Go meal be considered C-1 if there was interaction between client and staff/volunteer, such as a wellness check or nutrition education, at the time of meal pick up?**

Although these types of interactions are important and beneficial, social interaction before or after a meal is not what makes it a C-1 meal - congregating while eating makes it a C-1 meal.



# Current Guidance: C-2

## Criteria

- To-Go meal is consumed offsite without in-person or virtual congregating

## Example

- Client picks up meal and there is not a live virtual activity arranged by the provider.

## Requirements

- If meal is picked up,
- initial assessment may be done with the client in person at the time of meal pick up or via telephone
  - quarterly eligibility reassessments may be done with the client in person at the time of meal pick up or via telephone

# Common Questions: C-2

**1. How can a client who is not homebound be eligible for C-2 To-Go meals?**

"Homebound" is not an eligibility requirement for C-2 meals. Per AP Contract, individuals who are *"Frail as defined by 22 CCR 7119, homebound by reason of illness or disability, or otherwise isolated"* are eligible for C-2 meals. "Otherwise isolated" may be interpreted as not comfortable dining in a group setting.

**2. When completing the initial assessment for C-2 clients who pick up To-Go meals, how are ADLs/IADLs addressed?**

Since To-Go meal clients are eligible for C-2 meals by reason of "otherwise isolated", they may not need assistance with ADLs/IADLs. It is acceptable to mark "1- Independent" for clients who do not need assistance with ADLs/IADLs.

**3. What information is required for the quarterly eligibility reassessments for clients who pick-up To-Go meals?**

Since the purpose of the quarterly check is to reassess eligibility for C-2 meals, it can be as simple as documenting eligibility reason and asking if the client is able to attend in-person dining.



# Current Guidance: Combination C-1 and C-2

## Criteria

- Clients receive both C-1 and C-2 meals

## Examples

- Client dines at C-1 site several days per week and takes To-Go meal once per week (no virtual activity provided).
- Client dines at C-1 site daily and receives extra To-Go meals for the weekend.

## Requirements

- Register client in the program they participate in the majority of the time.
- Count each meal according to if they are C-1 or C-2 based on definitions.

# Common Questions: Combination C-1 and C-2

1. **If a C-1 client also receives C-2 meals, are the C-2 assessment and quarterly eligibility reassessments required?**

If the client is primarily a C-1 client, they should be registered as a C-1 client (using C-1 intake form). Quarterly eligibility reassessments would not be applicable.

2. **How do we categorize clients and meals in a rural site that provides one congregate meal and four frozen To-Go meals per week and does not provide virtual activities?**

Each client should be registered as a C-2 client since the majority of meals are consumed offsite without congregating. Meals are reported as one C-1 meal and four C-2 meals.

3. **How do we report meals if client picks up two To-Go meals and only one virtual activity is provided per week?**

Since only one virtual activity is offered, meals in this scenario are reported as one C-1 meal and one C-2 meal.





# Considerations for Accommodating To-Go Meals

- Request for Proposals/Contracts/Amendments
  - Flexibility for C-1 providers to serve C-2 meals and receive C-2 funds
  - Scope of work for serving C-2 clients, including C-2 assessments and quarterly eligibility reassessments
- Transfers
  - Submit transfer requests between IIB and IIC via budget revision or amendment through 1/15/24.
  - Transfer requests >30% between IIB and IIC and >40% between C-1 and C-2 are reviewed and approved by finance and program teams.
  - If transfers not an option, consider other funds.
  - Contact [finance@aging.ca.gov](mailto:finance@aging.ca.gov) with any questions.





# Questions?





### Contact Information:

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### Resource:

[Older Californians Nutrition Program](#)

