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Older Adults Program Branch

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To-Go Meals Guidance Webinar

Q & A

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General

1. Will the presentation be sent out after the webinar?

The webinar recording and slides are now available on the Older Californians Nutrition Program (OCNP) webpage under [Resources for the OCNP](#).

2. Is there a consideration to allocating funding as “Title IIIC funding” rather than separating into C-1 and C-2? The 20% limit for C-1 To-Go meals will be difficult to manage.

Allocating C-1 and C-2 into one IIIC bucket has been suggested to the Administration for Community Living (ACL). It is a decision that would be made at the federal level.

Regarding the 20% limit for Congregate (C-1) meals without congregating, this is ACL’s *proposed* language for the update to the Older Americans Act (OAA). Note that this language is not finalized. Current guidance (both federal and state) stands for now.

C-1/C-2 Requirements

3. What if a contractor provides the same number of C-1 and C-2 To-Go meals weekly to a client? What should be their primary program?

If the client participates in both the C-1 and C-2 programs equally, it is up to the AAA to provide guidance on whether the client should be registered as a C-1 or a C-2 client since the decision could go either way.

4. Can a third party, such as a family caregiver, pick up meals for a homebound C-2 client? For example, sometimes providers do not have enough drivers, or have drivers who won’t travel certain roads.

The current definition of the C-2 program is “a meal provided to a qualified individual in his/her place of residence”. If an AAA or provider is not able to provide C-2 home-delivered meals to a homebound eligible client due to staffing or inability to deliver to a certain area, an alternative may include arranging for a caregiver to pick up the meals and deliver them to the client. Note that the initial assessment as well as quarterly eligibility reassessments every other quarter would need to be conducted with the client in the home following California Code of Regulations [\(CCR\) 7638.3\(a\)\(2\),\(4\)](#) Requirements for Home-Delivered Meal Services.

5. If emergency shelf-stable meals are distributed to C-1 clients, must there be a virtual activity provided in order to qualify as C-1 meals?

It is not a requirement to provide virtual activities with shelf-stable emergency meals, but the meals would need to be funded and reported as C-2 meals. If virtual activities are provided to accompany the meals, then they would be C-1 meals.

6. For To-Go meals, does there need to be a set menu, or could they all be Chef's Choice as long as they meet meal requirements?

To-Go meals need to meet the same requirements as other C-1/C-2 meals as per [CCR 7638.5](#). Meals must be planned 4 weeks in advance, be analyzed by an RD for compliance (which requires that specific foods are listed on the menu), and be posted for clients. Chef's Choice meals that do not meet these requirements would not be allowable.

Virtual Activities

7. Does the virtual activity need to be provided by the C-1 provider for the meal to be counted as a C-1 meal?

A virtual activity needs to be provided by the provider for all the To-Go meals that day to be considered C-1 meals.

8. When do the virtual requirements need to be implemented?

Virtual activity requirements for C-1 meals have been in place with PM 23-05, [Appendix A](#). The only requirement that has changed is that providers are no longer required to track confirmation of clients' intent to join the virtual activity, although it is encouraged. The provider only needs to provide a live virtual activity for the To-Go meals for that day to be considered C-1 meals.

9. Does there still need to be tracking for clients who are saying they will participate in To-Go meals with virtual activities?

The provider is no longer required to track confirmation of clients' intent to join the virtual activity, although it is encouraged. The provider only needs to provide a live virtual activity for the To-Go meals for that day to be considered C-1 meals.

10. Since providers are no longer required to track clients' confirmation of intent to join a virtual activity, should activities still be tracked when provided? If so, how should that information be documented?

Although providers are no longer required to track confirmation of clients' intent to join a virtual activity, providers should track and maintain records of all virtual activities provided. Records should include the date, time and virtual activity provided; however, there are no specified tracking requirements.

11. Does the virtual activity need to be provided at the same time as mealtime/distribution or is it acceptable as long as the activity occurs the same day?

The intent is that C-1 meals include congregating during mealtime. We know that it is not always possible due to variance in pick-up time vs when clients may choose to eat their meal but, ideally, strive to offer virtual activities near a standard mealtime.

12. Does the virtual event need to be provided by the nutrition provider or can the AAA host the event?

If the AAA is hosting a live virtual event, providers can work with the AAA on scheduling, notifying participants of the virtual activity information (e.g., date, time, weblinks, phone number, etc.), and facilitating the event such as providing introductions and closing the event.

13. Is there a length of time the virtual sessions need to be?

There is no time requirement for live virtual activities. For example, they can be 10 minutes or one hour. Both are acceptable.

14. Is a movie showing appropriate for a virtual activity?

Any type of virtual congregating arranged by the provider where participants are engaging in a virtual activity together, such as watching a movie, is an appropriate activity.

15. It would be helpful to have a list of the virtual activities being offered. Would it be possible to share what AAAs and providers are offering?

Two resources utilized by AAAs include [Loop](#) and [Well Connected](#). With both of these resources it's important to note that providing clients with a list of virtual activities to join on their own does not meet the requirement for a C-1 meal. The provider needs to arrange a live virtual activity where C-1 clients can "congregate" while eating their meal.

YouTube offers a variety of travel and nature videos and live cams which can be shared using "Screen Share" in a virtual platform (Zoom, etc.).

16. If there is a virtual activity like LOOP, could agencies use C-1 funding to provide the activity for C-1 To-Go clients?

It is allowable to use Title C-1 funding, or supplemental funding sources for C-1, for expenses related to virtual activities since the virtual activities fulfill the congregating aspect of the program.

17. We are assuming C-1 participants have access to virtual media. What obligation does the nutrition provider have to provide/confirm that?

Providers are not responsible to ensure that all clients have internet access; however, it is a best practice to assist clients with internet access if feasible. Surveys might be a good way to find out what technological resources your clients have and what accommodation(s) your clients may need. Consider resources such as Digital Connections if available in your planning and service area.

Data Reporting

18. Is data for To-Go meals entered into CARS or are meals reported separately?

If the meals are Title IIIC-funded, they would be reported as C-1 or C-2 meals in CARS. If the meals are funded through Nutrition Modernization funds or other supplemental funds, they would be reported as C-1 or C-2 meals in the Online Data Reporting Tool (ODRT). Meals are not further categorized in CARS or the ODRT into C-1 To-Go and C-2 To-Go, however, that would be useful data to collect if you are able to do so.

19. Are ARPA-funded C-1 and C-2 meals reported ODRT or CARS?

Meals that are ARPA-funded, or funded by other supplemental funding sources, are reported in the ODRT.