



# Providing Bulk Foods During the COVID-19 Pandemic

## Questions and Answers for Child Nutrition Program Operators

For additional COVID-19 Guidance, please visit the School and Child and Adult Day Care Meals COVID-19 guidance web page at <https://www.cde.ca.gov/ls/he/hn/schoolmeals.asp>

### Question 1—Can we provide multiple days' worth of meals at once to households?

Yes. Child Nutrition Program (CNP) Operators may provide eligible children or adults in day care with meals for up to one week at a time.

### Question 2—Can we provide food in bulk (e.g., providing a gallon of milk instead of individual cartons)?

Yes. CNP Operators are permitted to provide components in a bulk "grocery-style" to assist with storage and other operational challenges. This may require additional math to calculate how much of a component is needed for a household. For example, for the milk component, if a household has 3 children picking up both breakfast and lunch meals for 5 days, calculate the number of half pints of milk needed ( $3 \text{ children} \times 2 \text{ meals} \times 5 \text{ days} = 30 \text{ cups}$ ). A gallon of milk is equal to 16 half pints, so 2 gallons is enough to meet the minimum requirement of 30 cups).

### Question 3—What documentation should accompany the bag(s) of bulk food?

CNP Operators should provide each household with:

- A menu for each of the meals with a list of ingredients in each food (include any allergens).
- Directions indicating which items should be used for each meal and the planned serving sizes of each food.
- Instructions on storage and preparation in accordance with food safety principles. For guidance on food safety, reference the California Department of Education (CDE) fact sheet for handling food safely. Please go to Safe Food Handling Practices (PDF) at <https://www.cde.ca.gov/ls/nu/documents/foodsafetyfactsheet.pdf> to download and view the fact sheet or contact your local environment health agency.
- A discard date for food that is not consumed.



**Question 4—Do we need a waiver to provide food in bulk?**

No. According to the U.S. Department of Agriculture Memorandum SP 13-2020, CACFP 07-2020, SFSP 06-2020, CNP Nationwide Waivers: Questions and Answers (PDF) available at <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP13-2020s-a.pdf>, CNP Operators with approved noncongregate feeding and meal service time waivers may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal.

Exception: CNP Operators using the Summer Seamless Option meal pattern that cannot obtain multiple types of milk in bulk form may request a meal pattern requirements waiver by completing the online Meal Pattern Waiver Application at <https://surveys2.cde.ca.gov/go/mealpatterncovidwaivers.asp>.

CNP Operators may email [CNPMealPatternWaiver@cde.ca.gov](mailto:CNPMealPatternWaiver@cde.ca.gov) with additional questions regarding meal pattern requirements.

**Question 5—When implementing bulk foods as a delivery mechanism, what factors should be considered?**

**CNP Operators:**

- **Must** include the required food components in at least the minimum amounts for each reimbursable meal being claimed, unless the CNP Operator has an approved meal pattern waiver for specific component(s).
- **Must** ensure that food items are clearly identifiable as making up reimbursable meals.
- Consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating.
- Ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.
- Employ a system to document how food was distributed.

**Question 6—What are examples of bulk items that we can send home?**



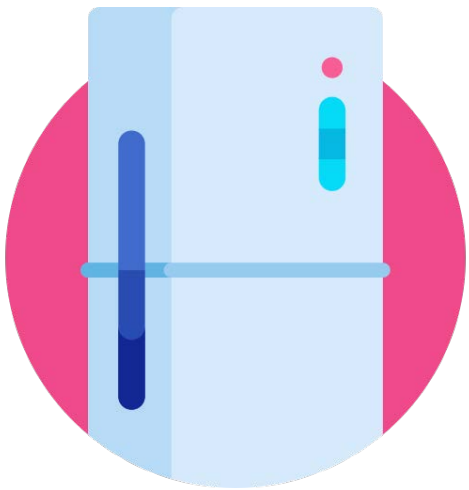
Examples of items that CNP Operators can provide in bulk include bags of rice and pasta, loaves of bread, jars of peanut butter, boxes of chicken nuggets, blocks of cheese or bags of shredded cheese, containers of hummus, gallons of milk, broccoli heads, bags of lettuce, bags of baby carrots, and canned fruit.

**Question 7—Can the CNP Operator package and distribute frozen food items (e.g., precooked chicken nuggets) that need to be reheated and/or shelf-stable foods that need to be cooked at home (e.g., dry pasta) as part of the reimbursable meals?**

Yes, if specific measures are taken. These food items must meet the applicable CNP meal pattern requirements in order to be served as part of the reimbursable meal, unless the CNP Operator has an approved meal pattern waiver, and should be accompanied by the documentation listed in question #4 above.

CNP Operators should include the food safety guidance listed below and the CDE Safe Food Handling Practices fact sheet (PDF) at

<https://www.cde.ca.gov/ls/nu/documents/foodsafetyfactsheet.pdf>.



- Provide frozen foods only if they are labeled as “fully cooked,” “precooked,” or “ready-to-eat” on the manufacturer’s packaging. CNP Operators should not distribute any raw animal-based time/temperature control for safety food items, such as raw chicken, raw eggs, raw beef, etc.
- Place food into food grade bags or packaging.
- Include a copy of ingredient lists (including any allergens).
- Provide reheating and cooking instructions. Since many households may be using the microwave, we suggest simplifying those instructions by stating: **Heat all parts of the food to a temperature of at least 165 degrees Fahrenheit.**
- Provide storage instructions, clearly identifying the menu items requiring immediate refrigeration or freezing. Instruct households to discard all refrigerated foods after seven days of receiving it.

**Question 8—Can we provide hot, ready-to-eat meals to households?**

Yes. Hot food should be provided only if it is intended to be consumed upon receipt. Instruct households to consume hot foods within two hours of receipt or one hour if the room temperature is above 90 degrees Fahrenheit.

**Bulk Milk Distribution Chart**

**5-Day Distribution  
(Breakfast and Lunch)**

<b>Number of Children</b>	<b>Gallon (16 Cups)</b>	<b>½ Gallon (8 Cups)</b>	<b>½ Pint (1 Cup)</b>	<b>Total Volume</b>
5	3	0	2	50 Cups
4	2	1	0	40 Cups
3	1	1	6	30 Cups
2	1	0	4	20 Cups
1	0	1	2	10 Cups

**Bulk Milk Distribution Chart**

**3-Day Distribution  
(Breakfast and Lunch)**

<b>Number of Children</b>	<b>Gallon (16 Cups)</b>	<b>½ Gallon (8 Cups)</b>	<b>½ Pint (1 Cup)</b>	<b>Total Volume</b>
5	1	1	6	30 Cups
4	1	1	0	24 Cups
3	1	0	2	18 Cups
2	0	1	4	12 Cups
1	0	0	6	6 Cups

**Bulk Distribution Chart**

**2-Day Distribution  
(Breakfast and Lunch)**

<b>Number of Children</b>	<b>Gallon (16 Cups)</b>	<b>½ Gallon (8 Cups)</b>	<b>½ Pint (1 Cup)</b>	<b>Total Volume</b>
5	1	0	4	20 Cups
4	1	0	0	16 Cups
3	0	1	4	12 Cups
2	0	1	0	8 Cups
1	0	0	4	4 Cups

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