



Providing Bulk Foods During the COVID-19 Pandemic

Questions and Answers for Child Nutrition Program Operators

For additional COVID-19 Guidance, please visit the California Department of Education (CDE) COVID-19 Guidance in the Child Nutrition Programs (CNP) web page at <https://www.cde.ca.gov/ls/nu/cnpcovid19guidance.asp>

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

Yes. CNP Operators may provide eligible participants with meals for up to one operational 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 bulk to assist with storage and other operational challenges. This may require additional math to calculate how much of a component is needed for each participant. 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 (1 cup) of milk needed (3 children x 2 meals [1 cup per meal] x 5 days = 30 cups. A gallon of milk is equal to 16 half pints, so 2 gallons is enough to meet the minimum requirement of 30 cups). For assistance with additional calculations, see also the bulk milk distribution chart.

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

CNP Operators should provide each household with:



- A menu and 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 CDE fact sheet, Safe Food Handling Practices (PDF) at <https://www.cde.ca.gov/ls/nu/documents/foodsafetyfactsheet.pdf>, or contact your local environment health agency.
- A discard date for food that is not consumed.
- A list of ingredients and allergens should be available upon request.

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 using the flexibilities provided through the noncongregate feeding and meal service time waivers may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal.

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 (MPW) for a specific meal pattern requirements. For information on how to apply for a MPW, email the CDE MPW Team at SNPMPW@cde.ca.gov.
- **Must** ensure that food items are clearly identifiable as composing reimbursable meals.
- Consider whether households have access to refrigeration, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating.
- Ensure that foods are ready-to-eat, or only minimal preparation is required, and that food is not provided as recipe ingredients which 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?

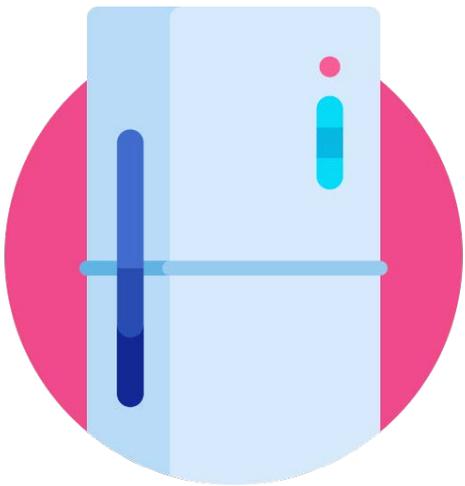


Examples of items that CNP Operators can provide in bulk include cartons of yogurt, gallons of milk, large bags of baby carrots, containers of hummus, canned fruit, and blocks of cheese. Because CNP Operators receive reimbursement to prepare and serve meals, items that require cooking, rather than just reheating, are not allowable. Examples of **unallowable bulk foods** include raw poultry and bags of uncooked rice and pasta.

Question 7—Can the CNP Operator provide participants frozen food items (e.g., precooked chicken nuggets) that need to be reheated, and/or shelf-stable foods (e.g., instant oatmeal) that require the addition of hot water, as part of reimbursable meals?

Yes, if the food items 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 MPW).

CNP Operators should follow the food safety guidance listed below and provide the CDE Safe Food Handling Practices fact sheet (PDF) at <https://www.cde.ca.gov/ls/nu/documents/foodsafetyfactsheet.pdf> to CNP participants when bulk meals are provided.



- Provide frozen foods only if they are labeled as “fully cooked,” “precooked,” or “ready-to-eat” on the manufacturer’s packaging. CNP Operators **may not** distribute any uncooked animal-based 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, the CDE suggests 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 seven days after 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)

Number of Children	Gallon (16 Cups)	½ Gallon (8 Cups)	½ Pint (1 Cup)	Total Volume
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)

Number of Children	Gallon (16 Cups)	½ Gallon (8 Cups)	½ Pint (1 Cup)	Total Volume
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)

Number of Children	Gallon (16 Cups)	½ Gallon (8 Cups)	½ Pint (1 Cup)	Total Volume
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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