This policy and procedure template is not guidance nor legal advice provided by the Nutrition and Aging Resource Center or the Administration for Community Living.

<Name of Agency>

Nutrition Services  
Sample Grab-and-Go Meal Policy

< Additional agency information>

<Date created/last updated>  
  
<Agency disclaimer, if applicable>

Grab-and-go meals are allowable as an Older Americans Act Title III-C service type. The sample policies below will help you determine when grab-and-go meals qualify for Title III-C1 (congregate) vs. Title III-C2 (home-delivered) funding.

It should be noted that C1 meals have a demonstrated [positive impact](https://acl.gov/sites/default/files/programs/2017-07/AoA_outcomesevaluation_final.pdf) on clients’ nutritional health, socialization, and health and well-being. Therefore, as appropriate, C2 clients may be actively encouraged or required to attend C1 meals.

# Gathering client information

Participant intake information must be collected at initial sign-up or within two weeks of the start of service for all C1 and C2 clients, including those receiving grab-and-go meals. Intake information must include all [required State Performance Report elements](https://acl.gov/senior-nutrition/grantee-reporting).

* 1. C1 and C2 clients
     1. Client characteristics (e.g., age, sex)
     2. Whether they live alone
     3. Rurality
     4. Low-Income status
     5. Nutrition Screening Initiative (DETERMINE checklist)
  2. C2 clients (and C1 clients who may potentially use C2 services)
     1. Activities of daily living (ADLs)
     2. Instrumental activities of daily living (IADLs)
  3. Additional information
     1. Prioritizing criteria
     2. Items related to the need for a meal and/or special meal needs
     3. Existing supports and needs for additional supports/services

# Title III-C1 Meals

Grab-and-go meals that include in-person, phone, or virtual interaction, as described below, qualify as C1 meals and are funded with C1 funds.

* 1. If Consumed On Site:
     1. The meal is served with the intention that it will be consumed on-site.
     2. Examples: Dining may occur indoors (restaurants, grocery stores, etc.) or outdoors (parks, picnics, food trucks, festivals, tailgate parties, etc.)
     3. At least a portion of the meal is consumed in a congregate setting. Policies can be developed or adapted to allow clients to take their leftovers when they leave the congregate site.
  2. If Consumed Off-site:
     1. Meal is picked up by the client (or their agent) or delivered to the client.
     2. In-person, phone, or virtual interaction is included with the intention for a provider meal to be consumed during the interaction, such as:
        1. Online or phone gathering scheduled by the nutrition provider, such as nutrition education, virtual games, or group chat that **offer live interaction** with participants and are intended to accompany a meal.
        2. One-on-one interaction during the meals, arranged by the nutrition provider. It may be completed via telephone, virtual platform, or in person.
  3. Registering Clients for Virtual or Telephone Congregate Meal Attendance
     1. The service provider is not responsible for ensuring that clients attend the virtual or phone congregate meal, although that is encouraged; they are only responsible for tracking confirmation of planned attendance.
     2. Client sign-up for meals is a recommended opportunity to confirm that the client intends to participate in the virtual or phone congregate meal.
     3. The meal is considered a C1 meal if the client confirms their intent to join the virtual or phone activity. Otherwise, it is considered a C2 meal.
     4. If a person signs up for but regularly does not attend virtual or phone congregate meals, the provider should contact the participant to determine what barriers exist to provide any appropriate additional services or assistance.

# Title III-C2 Meals

Grab-and-go meals consumed offsite without in-person, telephone, or virtual interaction during the meal are considered C2 meals and are funded with C2 funds.

* 1. Criteria for C2 Meals
     1. Meal is picked up by the client (or their agent) or delivered by the provider to the client.
     2. In-person, telephone, or virtual interaction with the meal is declined, not appropriate, or unavailable.
     3. Providers may require initial or periodic in-person C1 attendance or institute similar policies, which are intended to encourage or facilitate C1 participation.
  2. Eligibility  
     To receive C2 grab-and-go meals, clients must meet at least one of the following C2 eligibility requirements:
     + 1. Frail
       2. Homebound because of illness or disability
       3. Otherwise isolated
  3. Prioritization  
     Providers unable to serve all clients eligible for the C2 program must have a wait list and a prioritization policy and procedure in alignment with state unit on aging (SUA) policy.

# Assessments

* 1. Initial Assessments
     1. Must be completed within three months of service initiation.
     2. Include screening for health risks, identification of unmet social and economic needs, referrals to community-based supports, etc.
     3. May be completed in-person (for example, if meals are picked up), virtually, or via telephone.
     4. Must be conducted in the home if meals are home-delivered by the provider.
  2. Reassessments
     1. Must be performed quarterly.
     2. May be completed in-person (for example, if meals are picked up) or via telephone.
     3. Must be conducted in the home if meals are home-delivered by the provider.

# Reporting

* 1. C1
     1. Grab-and-go meals must include in-person, telephone, or virtual attendance at a congregate meal gathering to be counted as C1.
     2. For virtual and phone participation, each meal must have a corresponding client confirmation of intent to attend virtually. For example, if five meals are provided and the client confirms one virtual congregate meal attendance, only one meal may be considered C1; the other four are C2 meals.
  2. C2
     1. Grab-and-go meals that are consumed offsite without in-person or virtual interaction during the meal.

# Contract Considerations

Area Agencies on Aging (AAAs) may consider expanding contracts to allow providers to serve clients receiving C1 and C2 meals. This approach maximizes person-centered service delivery as client needs, preferences, and circumstances may change over time.

Consider the following for new contracts or as amendments to current contracts:

* 1. C1 providers may serve C2 grab-and-go meals.
  2. C1 providers may be paid with C2 funds for C2 meals provided.
  3. C1 providers who provide C2 grab-and-go meals conduct intake, initial assessments, and reassessments as described above.

# Funding Transfers

AAAs may submit a request to the SUA to transfer federal or state funds.

* 1. For Transfers Between C1 and C2:
     1. Up to 40% of OAA funds received can be transferred.
     2. Requests for > 40% require justification and will be reviewed by fiscal and program teams for consideration.
  2. For Transfers Between Titles III-B and III-C:
     1. Up to 30% of OAA funds received can be transferred.
     2. Requests for > 30% require justification and will be reviewed by fiscal and program teams for consideration.