**Emergency Feeding Program Framework**

**Internal Control Plan**

***Emergency Feeding Program* Framework**

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# EMERGENCY FEEDING PROGRAM FRAMEWORK

## Situation

**Insert background information here regarding the need for the emergency feeding program, the purpose of the program, the entities covered by the program and the expected duration of the feeding program.**

**Example:**

Since the onset of the COVID-19 pandemic in the United States, many states have issued Executive Orders requiring residents to stay home or at their place of residence. These EOs have further stated that the supply chain must continue, and residents must have access to such necessities as food, prescriptions, and health care.

The purpose of the Emergency Feeding Program is to ensure X state citizens over the age of 65 who have been exposed to or contracted COVID-19, but do not need hospitalization, or are high-risk with underlying health conditions have regular access to prepared meals. Extending wrap-around services to this at-risk population will reduce the amount of people that will need to be in non-congregate shelters while fulfilling the mission of taking care of the most vulnerable population during this pandemic.

These individuals are not eligible for public nutrition programs, such as the Supplemental Nutrition Assistance Program (SNAP) or Home Delivered Meals. They are also unable to prepare meals or do not have access to food resources, as a result of self- isolation and abiding by EO #. Furthermore, these individuals do not have a family or community support system to provide consistent access to food resources or prepare meals on their behalf.

There are 5.7 million x state citizens over the age of 65, with 100,000 living alone. Of that population of individuals, 10,000 are state citizens over the age of 65 received congregate or meal delivered meals through the Older Americans Act prior to issuance of the stay at home orders.

## Purpose

**Insert Purpose here. Include activities covered in FEMA approval letter that are eligible for PA funding. Activities covered are those which are found in the Emergency Feeding Program approval letters.**

**Example:**

The purpose of this emergency feeding program is to ensure that older and high- risk X state citizens, as specified, are connected to local restaurants to ensure they are getting prepared meals as they are under the state Stay-at-Home order. This multi-agency plan developed by the X state Governor’s Office of Emergency Services, the X state Health and Human Services, and the X state Department of Aging will serve as an integrated strategy that leverages available federal, state, and local resources.

## Scope

**Insert scope of the action here. Include information such as: administering authority within the state, local program administrators, etc. Also include duties of those administrators and how funds will be utilized.**

**Example:**

The authority to administer this program on behalf of the State of X will exist primarily with x entity. The State Administrator, will allocate funds on a regional basis to local program implementers. A local program implementer can be any of the following local jurisdictions, either independently or as a coordinated effort, as determined by the department: the local Area Agency on Aging (AAA), the local government’s Aging & Adult services, a county office of emergency services, or a municipality.

In addition to the allocation of funds with the local program implementers, the state administrator may execute, as necessary, contracts with delivery platform network for distribution services and manage or assist with consistent reporting values across jurisdictions.

The State Administrator will ensure that the emergency feeding program executes the following:

* Serve nutritionally appropriate and balanced meals to eligible participants.
* Ensure the utilization of and support of existing local restaurant operations.
* Ensure program compliance with Federal procurement [standards](https://www.fema.gov/news-release/2020/03/20/procurement-under-grants-under-exigent-or-emergency-circumstances) and FEMA Public Assistance procurement [requirements](https://www.fema.gov/procurement-disaster-assistance-team).

## Planning Assumptions

**Insert any planning assumptions here. Planning assumptions include items such as expected costs of meals and delivery, cost share breakdown, eligibility verification methods, data capture requirements, etc.**

**Example:**

* The capacity of local AAA and jurisdiction to serve this population varies widely. The State Administrator should be prepared to put appropriate program support mechanisms in place as needed.
* Costs will be limited to $66 for three (3) meals, inclusive of delivery and reasonable administrative costs. This is based on an average of the U.S General Services Administration per diem rates for x state as follows: $16 for breakfast, $17 for lunch, $28 for dinner, and incidental expenses of $5.
* Program cost breakdown is as follows: 75% FEMA share, 15% state share, and 5% local share.
* The total cost for the first 14 days of FEMA’s approval is $ 123,456 dollars.
* Our estimate total costs if we extend the program another 16 days will be $ 123,456 dollars.
* Individual participation eligibility verification can be completed over the phone and can be obtained through self-certification, similar to other eligibility verification for disaster programs.
* Individuals providing delivery of meals must complete a background check to ensure safety of participants.
* Recent state investments in local 2-1-1 operations will allow for this to be a major entry point for seniors and individuals at-risk seeking access to nutritionally appropriate meals.
* Local program implementers must capture the minimum data elements:
  + Name
  + Address
  + Telephone number (where available)
  + Meals delivered, delivery date, and total count
  + Date of Birth
  + Participant eligibility information
  + Participant food sensitivities, such as allergens

## Operational Considerations

**Insert operational considerations here. Operational considerations could include selection process for local implementers (including demonstrated ability to collaborate with local governmental jurisdictions and outreach programs), implementation strategy for work flow, determination of eligibility guidelines for participants, restaurant selection criteria, nutritional guidelines for meals, delivery strategies, etc.**

**Example:**

Local program implementers will be selected based on program experience as well as ability to scale meal delivery operations and workforce and to coordinate with county emergency operations. Local program providers will, either directly or through contracted services as approved by state’s Department of Aging:

* Enroll eligible older citizens through a self-certification process;
* Select participating local restaurants; and
* Establish delivery services through delivery platform network or another workforce.

Local program providers must demonstrate collaboration with local governmental jurisdiction (i.e., County, City or Tribes), given need for scale, essential personnel, and connection to emergency-operations of government. Local funds will be allocated to local program implementers with existing population-based formula for Older Americans Act.

Other operational considerations include the following:

* Participant Promotion & Outreach
  + Local 211, CBOs, AAA/Local Government, State COVID19 Web & Info Line
* Participant Eligibility
  + Must be 65 or older, have underline health risks either mental or physical high-risk, or other individuals defined by the CDC[[1]](#footnote-1).
  + High-risk includes those who are COVID-19 positive or COVID-19 exposed as documented by a public health official or medical professional or individuals with an underlying condition.
  + Must live alone or with one other program-eligible adult.
  + Must not be currently receiving assistance from other federal nutrition assistance programs and receive no more than $74,940 in income for a household of one (1) and $101,460 for a household of two (2), this equates to 600% of the federal poverty limit.
  + Must affirm an inability to prepare or obtain meals
* Restaurant Selection
  + Locally determined
  + Criteria includes ability to meet volume, ability to meet nutritional standards, and cultural needs.
  + 100% of meals must be provided by a restaurant not currently participating in a state or federal meal service program.
  + Local program implementer executes purchase order or contract for fixed order of meals.
* Meal requirements
  + A maximum of three, per day, per participant.
  + Breakfast low in sodium, no sugary drinks (<24 calories /8 oz. and of fruit juice, must be only 100 percent fruit juice allowed); and
  + Lunch and dinner a piece of fresh fruit or vegetable on each dish, and low in sodium, no sugary drinks (<24 calories /8 oz. and of fruit juice, must be only 100 percent fruit juice allowed).
* Cost
  + All claimed costs must be necessary and reasonable in order to respond to the COVID-19 Public Health Emergency and are subject to standard program eligibility and other Federal Requirements, including the prevailing cost-share for the respective declaration.
* Delivery
  + Locally determined
  + Options include restaurant workers, a delivery platform network, AAA/local government workforce, or volunteer.
  + Individuals must be subject to a background check to ensure safety of participants.

## Timeline

**Insert a timeline for emergency feeding operations here. This should include expected funds allocation dates, FEMA approved timeline for emergency feeding services, etc. Include a list of short term and long term tasks to complete work detailed above.**

**Example:**

The State Administrator will approve and allocate funds to local program administrators no later than April 24, 2020. FEMA approval is limited to costs associated with providing emergency feeding services through May 10, 2020, unless the public health need end sooner or an extension is granted by FEMA. The State, on behalf of itself and participating Tribal or local governments, must obtain FEMA’s approval for any time extensions. While it is anticipated that, upon successful program execution, the State will request an extension, there is no guarantee it will be granted.

### Short-Term Tasks

* Evaluate capacity amongst each AAA for local program administration based on current service network capacity and performance, number of meals provided, and existing collaborative efforts with other jurisdictions.
* Evaluate the need for a state-wide availability of a delivery option, i.e., delivery network provider, for areas where this resource is unavailable.
* Determine best mechanism to ensure uniform and consistent reporting values across local programs and appropriate public assistance expenditures.

### Long-Term Tasks

* Receive regular situational awareness briefings from all executed program efforts.
* Establish needs assessment process to support local program operations.
* Identify necessary variables to determine re-assessment and justification for continuing COVID-19-related emergency feeding services assuming the public health emergency persists beyond May 10, 2020.

### Anticipation of Requesting a Time Extension

If you are anticipating a request for an extension of the program after the current approval expires, FEMA will require documentation that supports an ongoing need per FEMA Policy FP 104-010-03, *Coronavirus (COVID-19) Pandemic: Purchase and Distribution of Food Eligible For Public Assistance*, dated April 11, 2020.  In this regard, please note that this documentation must include the following data (broken down by local jurisdictions participating in the State-managed EFP):

* Number of individuals that were receiving meal support (at peak);
* Number of individuals that are continuing to receive meal support and number of meals that have been provided per individual;
* Number of individuals that are 65 and over that are receiving meal support and average length of time that they have been receiving meal support;
* Number of individuals who are otherwise at high risk (as defined by the CDC) for COVID-19, such as those undergoing cancer treatment or dialysis and people with severe obesity or kidney disease, or other conditions that are receiving meal support and average length of time that they have been receiving meal support;
* Number of individuals that are COVID-19 positive, or have been exposed to COVID-19 and receiving meal support; and
* Average cost per eligible recipient of meal support.
* Documentation of the lack of other State or local resources to fill the need including, but not limited to food banks, PNPs, State funding sources, and additional federal resources, including ones that may be available under the multiple Congressional Supplemental Funding Bills known as the CARES Act, or any other additional resources made available at the time of your request.

1. http[s://w](http://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-)ww.[cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-](http://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-) at-higher-risk.html [↑](#footnote-ref-1)