



## Frequently Asked Emergency Management Questions For Aging Services Professionals at the State and Local Levels

### 1. Can a meal site move to a temporary food facility such as a firehouse, church, parks and recreation, etc. in case of emergency?

Yes. The State Unit on Aging (SUA) and Area Agency on Aging (AAA) should ensure current policy and procedures address procedures for moving a nutrition site in case of emergencies. Older Americans Act (OAA) provides guidance on the types of structures permitted as a meal site. Program providers should work with local health authorities to assure that their requirements (for example, an application and inspection) for temporary food facilities are met. If the meals meet the requirements for meals served through the OAA, they can be counted for Nutrition Services Incentive Program (NSIP) and Title 3 funding.

*For reference: OAA SEC. 339. NUTRITION A State that establishes and operates a nutrition project under this chapter shall—(2) ensure that the project—(A) provides meals that—(F) comply with applicable provisions of State or local laws regarding the safe and sanitary handling of food, equipment, and supplies used in the storage, preparation, service, and delivery of meals to an older individual.*

### 2. Could a meal site shut down and offer meals at another meal site location?

Yes, if a nutrition program (i.e. a provider that serves numerous meal sites within a geographic area) has to close down a site on a particular day for an emergency, they may move the meal site to another location within their jurisdiction. They may do so provided there is an open meal site that day within their catchment area that can accommodate the additional participants. If the meal site is a distance from the original location, transportation should be provided to ensure seniors can attend the alternative meal site location. If transportation is not an option due to the magnitude of the emergency, then other options should be explored such as setting up a temporary food facility or encouraging program participants to consume available shelf stable/ emergency meals.



**3. When are providers allowed to distribute emergency meals to program participants for planned weather related emergencies?**

The OAA does not address this issue. States and programs can determine for themselves the best time to distribute emergency meals. It is generally good practice to have them in the participant's home prior to when service interruptions are anticipated to occur. Program participants should be informed about the use of these meals, and these meals should be consumed within one year or according to expiration dates. All meals should be date labeled.

**4. When do providers count the emergency meals delivered to program participants?**

The OAA does not address this issue, however it is recommended that the meal would be counted when it is delivered.

**5. A nutrition provider has a fire at their facility and they lost some food inventory. In this example scenario, would the US Department of Agriculture (USDA) assist in providing reimbursement for NSIP commodities that are lost?**

No. However, USDA does provides supplemental nutrition assistance in response to numerous types of emergencies and disasters including, but not limited to hurricanes, tornadoes, severe storms, and flooding. To qualify, these emergencies must be Presidential declared emergencies. Money to buy and replenish food stocks used in emergencies comes from special funds that are available to the Secretary of Agriculture for food purchases. For more information, contact the USDA Food and Nutrition Service Public Information Staff at 703-305-2281, or by mail at 3101 Park Center Drive, Room 819, Alexandria, Virginia 22302. Information on Disaster Response programs is also available on the USDA website at [USDA Natural Disaster Assistance](#).

If the SUA has additional nutrition funds, they may use their funds to replace food that meets NSIP criteria. Facilities where foods are stored will carry insurance for fires, flooding, etc. so the nutrition provider should refer to its insurance policy to determine if the value of the donated foods would be covered in this instance.



**6. If a congregate nutrition provider has an emergency and they use shelf-stable meals, can those meals be counted as NSIP meals?**

Yes, in emergency situations only (remember: the purpose of congregate nutrition program includes socialization), these meals can be counted as NSIP (assuming, of course, that the shelf-stable meals are domestically produced and program participants meet NSIP requirements). A provider cannot, on a routine basis, count shelf-stable meals as NSIP meals. A prudent program administrator would count the meal when it is served.

**7. If a nutrition provider wants to send a congregate meal home with a senior, can it be counted as an OAA Title III C-1(congregate meal money) meal?**

No, you can't count it as an OAA Title III C-1 meal if you are sending a meal home. Meals consumed at home cannot be part of a C-1 site program. If the emergency has limited the participants' ability to attend a meal site, shelf-stable may be your best option. The provider may count shelf-stable meals as NSIP meals (assuming, of course, that both the shelf-stable meals and the program participants meet NSIP requirements). The shelf-stable meals can be counted when they are delivered.

**8. Are any accommodations ever made by the Administration for Community Living (ACL) for a state regarding NSIP funding for disasters (i.e. NSIP funding for next year will likely decrease as a result of emergencies)?**

NSIP reimbursement is based on the previous year's meals served, so it is possible that you may see a funding decrease as a result of your emergency. If a state reports a decrease greater than 10%, they are required to submit a variance explanation. The variance explanation briefly describes the cause for the decrease.

To limit the impact of serving fewer meals, a nutrition provider may deliver shelf-stable meals to Title III C program clients to be consumed on those days when service may be disrupted. In the event of an emergency where Title III C program participants consume their shelf-stable meals, the nutrition provider may deliver shelf-stable meals to replenish those consumed during the emergency event. Then the provider may count those replenishment shelf-stable meals as NSIP meals (assuming, of course, that both the shelf-stable meals and



the program participants meet NSIP requirements). The shelf-stable meals can be counted when they are delivered, as it would not be possible to know when the meals actually are consumed.

**9. Can the Title III C meal be served outside of the lunch hour to accommodate the additional logistics that may arise as a result of the emergency?**

Yes. The OAA does not address specific implementation issues. It is the responsibility of the SUA to develop regulations, policies, procedures, guidance and technical assistance to address program administration. The OAA requires that AAA consult with local service providers to decide the best time of service considering the local need for lunch, dinner or even breakfast programming. This is the case even without an emergency.