

Home Delivery Guidance During COVID-19 Response

New as of 4.15.20 – Updated 4/22/20

Background

This document includes industry guidance and best practices for direct to client food delivery. It also contains legal advice and member contract requirements pertaining to home delivery service of donated and purchased food during COVID-19 response. During this time, food banks may be fielding questions about potential partnerships from new and emerging prospects (such as hospitality, retail, or other food delivery companies) and we want to provide guidance as members explore partnership opportunities.

These recommendations may be used if:

- 1) a food bank is delivering to clients' homes as part of a route or Mobile Pantry;
- 2) agency staff or volunteer drivers are making deliveries; and
- 3) in partnership with a 3rd party meal delivery/grocery delivery partner.

At this time, guidance is being provided for the following scenario only:

- Delivery of shelf-stable items that do not require temperature control devices; and
- Donated and purchased food only.

Future guidance* will examine considerations for use of other food sources such as government commodities and/or products requiring temperature control. *Those considerations are listed at the end of this document.*

Please check with your state and local regulatory agencies to ensure there are not any additional requirements that are applicable.

Operations | Shelf-Stable Food Home Delivery

1. Determine Shelf-Stable Products to be Provided (Donated & Purchased)

- a. **Define what will be offered.** Food banks / agencies may vary food options made available for home deliveries. Offering the same pre-packaged, shelf-stable food to everyone is simplest and from a food safety perspective, the safest. However, customized menus may be developed for targeted audiences such as individuals with health conditions such as allergies or specific dietary requirements (e.g., low sodium, diabetic). The amount of food provided may also vary based upon family size.

2. Client Set Up

- a. **Identify the target population for the deliveries.** Food banks directly reach out to targeted populations or work with local agencies who perform the outreach.
- b. **Enroll clients** by contacting them and recording the following information:
 - i. Obtaining client's consent – written or verbal with date/time logged – that client is sharing their address and other personal information for home delivery purposes.
 - ii. Food preferences including any allergies or other dietary restrictions
 - iii. Contact information (address, phone number, and email), and
 - iv. Helpful notes for drivers (e.g., hard of hearing, limited mobility, leave food at front desk, etc.).

During the enrollment:

- v. Review delivery instructions: Confirm that shelf-stable food can be left at their door during the scheduled window.
- vi. For a no/low-touch distribution options, the client should stay inside and avoid contact with the driver.
- vii. If placing reminder calls for deliveries, ask permission to leave a voicemail or send text messages.

If working with a third-party food delivery service, you must ensure that client safety and privacy are a priority in your program design. Legal counsel recommended that you will want to create an agreement with a third-party delivery provider for a specific period of time that outlines client privacy and confidentiality. You will also want to ensure that tracking data is collected in the preferred format (e.g., .csv) for the agreement's intent – food assistance delivery.

- c. **Provide enrollment confirmation.** A good practice is to provide clients with confirmation of their order and a way to opt-out if needed. Text message services, call services, or email may be used. Example food bank services include Simple Texting, Five9, RingCentral, Google Voice, textit.in, and Twilio.
- d. **Provide distribution reminders.** The day before, be sure to remind recipients their food is coming via a phone call or text message. Include the time/window that food should arrive.

3. Pickup Location & Delivery Schedule

- a. **Designate the pick-up location** where drivers collect the food to deliver to homes. It could be the food bank warehouse, a designated agency, a Mobile Pantry, or a large drive-thru distribution site. *Remember that all applicable food handling, storage, and transportation regulations must be followed at every phase of this distribution process.* When deciding, consider the location's convenience (e.g., agencies may be closer to homes), limiting the number of food handoffs and handling of the food (e.g., the pick-up location is where the food boxes/bags are packed), and ability for ample space to accommodate social distancing (open space and drive-thrus).
- b. **Delivery window and frequency limits.** In order to communicate clearly with recipients, it is recommended that you set a consistent delivery window (e.g., Saturdays between 11 AM and 1 PM), and determine how often a client will receive food (e.g., every other week, monthly). Clear delivery windows will help ensure that clients are prepared to bring the food inside.
- c. **Define your driver intake process.** When recruiting volunteer drivers, require them to sign your standard volunteer waiver and adhere COVID-19 social distancing and personal hygiene standards.
- d. **Driver food safety training (see suggested resource section) is recommended.** Agencies are required to have safe food handling trained staff/volunteers.

Driver Preparedness

4. Routes

- e. **Group deliveries by proximity.** The number of deliveries may depend upon distances, traffic conditions, and weather.
- f. **Print or transmit routes.** Transmit list of delivery addresses and notes to third-party food delivery service and identify routes that can be filled by a single vehicle.

5. Product Matched to Drivers

- a. **Stage deliveries for pick-up.** Arrange the orders by route at the pick-up location in advance of driver arrival. Upon driver arrival, identify which route the driver will take, then load their vehicle with the orders corresponding to that route.
- b. **Tracking product is essential.** Food banks and agencies will need to ensure there is documentation to show who had control of product (traceability and food defense requirements) from the time it left the food bank or agency until it arrived with the client. A third-party driver must also be able to track the movement of the food and document control of possession.
- c. **Ensure drivers have proper equipment.** Drivers should have appropriate personal protective equipment (clean gloves and face mask/covering). Driver will be given a list of contact information for the recipients on their route, and instructions for interaction and what to do if a client is not home. Drivers should also have the contact information of the food bank or agency for questions or issues. Provide handwashing station at pick-up site and other personal protection equipment you normally provide drivers.
- d. **Conduct daily vehicle sanitation inspections** and keep appropriate records for all food transportation vehicles. All food transportation areas (e.g. trunks, backseats, cargo areas, or truck beds) should be clean and empty (i.e. free of all other objects, debris, packages, personal effects, etc.). Maintain daily vehicle sanitation inspection records for all vehicles (food bank, agency, 3rd party delivery operations).
- e. **Provide drivers with identifier.** Drivers should carry personal identification, a food bank or agency name tag, a letter as an essential business/volunteer, and/or window placards to provide identification if needed.

Client Delivery

6. Arrive at Pickup Location & Load Vehicle

- a. **Park** in the area designated for drivers.
- b. **Follow health and personal hygiene protocols.** Drivers must be in good health and not be experiencing any symptoms consistent with COVID-19. Drivers should wear **clean** masks or face covering and **new, disposable gloves provided at the pickup site after proper handwashing has occurred**, and follow social distancing procedures.
- c. **Load** food boxes into vehicle.
- d. **Confirm** route provided.

7. Deliver Orders

- a. **Driver will deliver** food to each address and ensure each order is matched to the address provided.
- b. **For a low/no touch distribution, drivers can leave orders** outside doors and ring the bell / knock on door to let the recipient know the food has arrived. Drivers should wait for a confirmation that the recipient is home. If available, a text message should be sent to confirm delivery has been made. If driver does not receive confirmation, driver will call the recipient. Alternatively, driver can place the order outside the door, knock, and then call the recipient from their car to confirm delivery was made. Many recipients may live in the same building / complex so drivers should consider bringing a cart to be able to deliver multiple orders to different floors.
- c. **For clients who do not indicate they are present** and are unable to be reached via phone/text, the driver may leave **non-perishable** product outside their door or at the place indicated in instructions. It is recommended that a picture is taken of the nonperishable product at the delivery point.

- i. If any clients in the delivery route do not indicate they are present, the driver should contact the food bank/agency for guidance on the final destination of the product. Food banks will attempt to locate the nearest available agency/program partner or make other arrangements.

Additional References and Guidance

Food Safety, Defense, and Traceability

- **Route records:** Remember to maintain delivery route records (location, time of drop off, received by) and to keep any 3rd party delivery records on file.
- **Client guidance:** A recommended practice is to include a flyer with the bags/boxes that encourage recipients to discard exterior packaging and wash their hands before and after unpacking the food, etc. You can include contact information for recipients to contact with food bank with any concerns or questions.
- **Training:** ServSafe has created a free, ten-minute food safety training video specifically for the COVID-19 environment, but includes general food safety principles as well – [visit this link](#) and select “ServSafe Delivery: COVID-19 Precautions.” Additional resources for driver food safety training: <https://nutritionandaging.org/food-safety-on-the-go/>
- **FDA Guidance:** Guidance from FDA FSMA’s final rule regarding transportation outlines that all product must be protected from possible physical, biological, or chemical contaminants. As such, product being transported in truck beds or uncovered trailers should have a covering – hard shell or a tarp, as examples.
- **Additional Guidance:** Guidance from the Conference for Food Protection with a report focused on home delivery: Direct-to-Consumer and Third-Party Delivery Service Food Delivery: http://www.foodprotect.org/issues/packets/2020Packet/attachments/III_004_content_c.pdf
- **Good Samaritan Act:** The Federal Bill Emerson Good Samaritan Food Donation Act was signed to encourage the donation of food and grocery products to non-profit organizations for distribution to individuals in need. This law reminds us that gross negligence is defined as "voluntary and conscious conduct by a person with knowledge (at the time of conduct) that the conduct is likely to be harmful to the health or well-being of another person." <https://www.law.cornell.edu/uscode/text/42/1791>

Recruiting and Screening Drivers

- **Screening:** It is important to make sure drivers are healthy and not experiencing any potential symptoms of COVID-19. Guidance on screening food workers/volunteer can be found [here](#).
- **Proxies:** Food banks/agencies might also consider recruiting clients who are driving to distributions and asking them if they have neighbors/friends in need for whom they could serve as a proxy and take food.

Driver and Client Health & Safety

Please follow the latest CDC guidelines for COVID-19 to ensure the safety of drivers, clients, food bank and agency staff, and volunteers.

- **What to do if you are sick:** <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>
 - **Guidance for businesses and employers:** <https://www.cdc.gov/coronavirus/2019-ncov/community/guidance-business-response.html>
 - **Cleaning your facility:** https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fcoronavirus%2F2019-ncov%2Fprepare%2Fdisinfecting-building-facility.html
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Future Considerations

*Guidance for client/home deliveries for additional food types such as government commodities and temperature-controlled and perishable products including refrigerated and frozen are being developed. Below are initial considerations to evaluate as you consider adding these types of products to home/client delivery programs.

*Considerations for Delivering Government Commodities

Federal commodities, such as food provided through The Emergency Food Assistance Program (TEFAP) or the Commodity Supplemental Food Program (CSFP) must be distributed under specific state and federal regulations. Food banks who do not ensure these requirements are met would be subject to a non-compliance decision by state or federal agencies on compliance audits. Before any federal commodities are delivered by third party entities, food banks must ensure this is in compliance with the state agency overseeing the program. Questions may be directed to Feeding America's government relations team or to your member engagement director.

Feeding America understands that particular vulnerable populations like seniors could need home delivery options during the pandemic, and that home delivery of food provided through the Commodity Supplemental Food Program (CSFP) could be something food banks want to consider.

There are specific considerations that should be carefully weighed before doing so.

1. Ensuring federal regulations allow for a third party to delivery CSFP foods to participants homes. Currently, the regulations do not specifically mention home delivery by third party companies, but there are federal program requirements that we believe USDA will need to provide guidance on before this can be recommended:
 - Proxies are allowed to sign for a recipient, however that proxy must be known by the recipient.
 - The food must be handed to the correct recipient or their specified proxy, food cannot be left on a doorstep unattended.
 - Signatures must be obtained on site from the recipient or a designated proxy.
 - Recipients must be at 130 percent of the federal level.
 - Must ensure drivers take CSFP food packages to the correct, eligible recipient households.
 - Federal regulations mandate that a designated distribution site must be established.
 - Frequency of distribution (bimonthly or monthly) is determined by the state.
2. Is this allowed by the state agency overseeing CSFP? Has the state provided specific guidance in the state plan to allow for this delivery model? Has the state granted a waiver to allow for this delivery?

*Considerations for Delivering Temperature Controlled Products (Refrigerated/Frozen):

If a food bank is considering home delivery of temperature-controlled products, remember that there are Local/State/Federal food safety requirements which must be adhered to for the safe delivery of temperature controlled for safety foods.

- **Temperature Control:** If a refrigerated vehicle will not be in use, the driver must have an insulated bag, thermal blanket, or cooler with ice packs to store product. Product should be completely insulated.
- The food bank/agency must ensure that the food is at a safe temperature of 41°F or less for refrigerated foods and frozen foods must be kept in a frozen state throughout delivery.
- Temperature sensitive food should be stored in a box or bag that is able to be sealed with tape or sticker to deter any tampering.
- Driver food safety training (see suggested resource section) is required. Agencies are required to have safe food handling trained staff/volunteers
- Drivers must store food away from any personal items (such as drinks, medication, children, their own groceries or food, etc.).
- Chemicals including auto care products and household cleaning products (glass cleaner, upholstery cleaner, disinfecting wipes) must not be stored near food items.
- Pets are not allowed in the vehicle while making deliveries.
- If multiple deliveries are made, the vehicle must be locked during the delivery. (Food defense recommendation)
- For clients who do not indicate they are present, perishable product must be returned to the vehicle and placed back in the active or passive cooling equipment. Record any failed deliveries and report back to food bank/agency before continuing to the next stop.
 - A possible step could be to divide any perishable items among the remaining client deliveries. Any agency or program receiving perishable food from these routes should be reminded to check the temperatures of all product they receive and note the time of reception. Any products that are outside of safe receiving temperatures should be discarded.