Memorandum

To: Institutions Participating in the Child and Adult Care Food Program
Sponsors of the Summer Food Service Program

From: Arnette Cowan, Head
Special Nutrition Programs

Subject: Transitioning from the Summer Food Service Program to Child and Adult Care Food Program At-risk Afterschool Meals

This memorandum highlights flexibilities available to Summer Food Service Program (SFSP) sponsors transitioning into the At-risk Afterschool Meals component of the Child and Adult Care Food Program (CACFP) during the school year. Many existing SFSP sites are well-positioned to offer afterschool meals during the school year through CACFP. Both organizations and communities benefit when meals are offered to children in low-income communities year-round. Organizations benefit from having the ability to hire year-round staff, a continuous flow of reimbursements providing additional financial stability, and recognition in the community as a stable source of services. Communities benefit by having a partner that provides year-round nutrition services for children and brings increased Federal funds into the local economy.

Applications
In an effort to streamline participation in CACFP, the Food and Nutrition Service (FNS) is waiving some application requirements for SFSP sponsors in good standing that wish to apply to participate in CACFP for the first time. Sponsors considered in good standing are those that are not currently seriously deficient in their operation of the SFSP. Additionally, FNS is eliminating duplicative application requirements.

Each new CACFP institution is required to meet the performance standards outlined in 7 CFR §226.6(b)(1). Because SFSP sponsors are already familiar with operating a Child Nutrition Program, they are not required to provide documentation that they have practices in place to ensure that the meal service, recordkeeping, and
other Program requirements are performed properly. Successful operation of SFSP provides evidence of this
performance standard.

Management plans are not required as part of the CACFP application unless the institution intends to sponsor
more than one facility. In addition, at-risk centers should be afforded latitude with regard to budgets. FNS has
previously noted that, although a budget is a necessary element of determining the viability of a Program
applicant, the level of budgetary detail requested should be commensurate with the size and scope of the
applicant.

CACFP sponsoring organizations are required to provide documentation indicating that they meet their State’s
criteria for ensuring delivery of benefits to otherwise unserved facilities or participants. Because States already
have a priority system in place for selecting SFSP sponsors to eliminate an overlap in service, States generally
need not require existing SFSP sponsors applying to participate in CACFP to provide any further
documentation of providing benefits to unserved facilities or participants.

The following are required for participation in SFSP and therefore are not required to be produced as part of the
CACFP application process:

- **Confirmation of Area Eligibility of Centers**: SFSP sites that establish area eligibility through the use of
  school data may use their area eligibility determination for SFSP and CACFP afterschool meals for a
  period of five years. There is no need to re-establish area eligibility for CACFP.

  However, because area eligibility for CACFP At-risk Afterschool Meals must be based on school data, SFSP sites that established eligibility using Census data or based on income eligibility forms must
  provide additional documentation indicating that they are area eligible based on school data.

- **Non-discrimination Statement**: SFSP sponsors are not required to resubmit a non-discrimination policy
  statement to participate in the CACFP. Additionally, if the media release submitted for SFSP indicated
  that the sponsor offers year-round meal services, an additional media release is not required.

- **Health and Safety Inspections**: Where the State or local health and safety inspection standards for at-
  risk afterschool centers and SFSP feeding sites are the same, CACFP State agencies may accept
  documentation of a current inspection obtained by a sponsor for SFSP.

- **Documentation of Tax-exempt Status**: Private nonprofit organizations are not required to resubmit
documentation of tax exempt status for CACFP when such documentation was submitted for purposes
of participation in SFSP.

**Agreements**
State agencies that administer more than one USDA Child Nutrition Program are required to enter into a single
agreement with school food authorities (SFAs) with respect to the operation of any combination of the Child
Nutrition Programs [7 CFR §225.6(e)]. State agencies are also strongly encouraged to enter into a single
agreement with other sponsors operating more than one Child Nutrition Program. Therefore, if the same State
agency administers both CACFP and SFSP, SFSP sponsors interested in offering afterschool meals through
CACFP during the school year are required only to sign an addendum to the existing SFSP agreement. In States
where CACFP and SFSP are administered by different State agencies, the sponsors must submit applications to,
and enter into an agreement with both State agencies. However, the State agencies are encouraged to work
together to share information and streamline the application and agreement process.
**Training**

Sponsors that participate in SFSP are familiar with operating a USDA Child Nutrition Program and should not be required to attend training prior to submitting a CACFP application. Similarly, members of the food service staff who receive meal service training under the SFSP are not required to attend separate CACFP training on meal services.

However, sponsor administrative staff must be informed about Program requirements and attend the necessary training. CACFP State agencies may offer targeted training on the at-risk component of CACFP during SFSP trainings to eliminate the need for the sponsor’s administrative staff to attend a separate CACFP training.

**Monitoring Requirements**

CACFP sponsors must conduct pre-approval visits to each center to discuss Program benefits and requirements and ensure that the facility is capable of providing the proposed meal service. State agencies may waive the requirement for pre-approval visits for centers that operated as SFSP sites.

Sponsors that operate SFSP and CACFP at-risk meals are not required to monitor their sites following the SFSP requirements and then monitor those same sites again following the CACFP requirements during the school year. Instead, such sponsors may follow the CACFP monitoring schedule year-round. If sponsors choose to follow the CACFP monitoring schedule year-round, one of the three annual reviews must occur during the summer, review for SFSP requirements, include the review of a meal service, and be unannounced; two reviews must occur during the school year, review for CACFP requirements, at least one must include the review of a meal service, and at least one must be unannounced.

**Financial Management**

A sponsor’s excess funds from either CACFP or SFSP may be used in its operation of other Child Nutrition Programs. Therefore, if at the end of the summer a sponsor has excess reimbursement from its operation of SFSP, those funds may be used for allowable costs in its operation of CACFP.

If you have questions, please contact your regional consultant.

c: SNP Staff