



Public Health  
HEALTH AND HUMAN SERVICES


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### Memorandum

To: Institutions Participating in the Child and Adult Care Food Program  
From: Arnette Cowan, Head   
Special Nutrition Programs  
Subject: Using Federal Funds to Support FoodCorps Service Members

This memorandum clarifies how state agencies and school food authorities can use federal funds to support FoodCorps service members. Serving alongside educators and community leaders, FoodCorps is a nationwide team of AmeriCorps service members that partner with schools to provide food and nutrition education, hands-on activities like gardening and cooking, and support for serving local products in Child Nutrition Programs (CNPs). FoodCorps is partially funded by AmeriCorps which is operated by the Corporation for National and Community Service (CNCS).

When FoodCorps service members are placed with a host organization, such as a school district or a state agency, the host organization is asked to pay a program service fee directly to FoodCorps to support the service member. There has been some concern about using federal funds like non-profit food service account (NPFSA) or state administrative expense (SAE) funds to pay this fee. This concern arose, in large part, due to indications in FoodCorps supporting documentation that any federal funds used to pay this fee must be eligible to match another federal grant. While some specific federal funding sources may be eligible for use as match, most Federal funds, including all Child Nutrition funds, cannot be used as a match for another federal program that has a match requirement (2CFR 215.23). Subsequent discussions with FoodCorps' have clarified that their agreement with AmeriCorps under which their activities in schools are conducted



does not have a matching requirement. On this basis we have determined that using NPFSA or SAE funds to pay for the FoodCorps service fee is allowable.

SAE funds are a source of nondiscretionary funding authorized under 7 CFR Part 235 for costs incurred in the State-level administration of the CNPs in accordance with an approved SAE Plan [7 CFR 235.5(b)]. SAE reallocation is a formal process by which State agencies may annually request additional SAE funds above their initial authorized funding level, or return funds that they do not need. State administrative funds (SAF) is nondiscretionary funding authorized under 7 CFR Part 225 for costs incurred in the State-level administration of the SFSP and in accordance with the State agency's Program management and administrative plan (MAP) [7 CFR 225.4]. Upon evaluation, funding adjustments may be made to reflect changes in Program participation.

Both SAE and SAF are allocated to state agencies annually and may be used to support statewide administration of CNPs. Allowable uses for SAE funds and SAF include, but are not limited to: State-level salaries and benefits; travel expenses; and costs associated with providing training and technical assistance to school food authorities (SFAs), institutions and sponsors. SAF and SAE (initially allocated or reallocated) may be used to support the program service fee for a FoodCorps service member as long as the service member is supporting state-level programming. If a portion of the member's work is dedicated to specific school districts, SAE funds may only be used to support the portion of work that the service member is doing to support statewide activities. Please see SP 28-2015, *Questions and Answers Regarding the Use of State Administrative Expense (SAE) Funds and State Administrative Funds (SAF) for Farm to School Related Expenses*, for more information on using these funds.

The incorporation of local food and agricultural education into the child nutrition programs can play an important role in creating and promoting a healthy environment. There is a well-established and growing public interest in supporting local and regional food systems and FoodCorps supports program operators in purchasing these foods and incorporating agriculture-based curriculum and activities. The addition of local foods can improve meal variety and quality and including agricultural education can both help to increase and maintain participation in CNPs.

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 established a Farm to School Program at the Department of Agriculture (USDA) to increase the availability of local foods in schools and institutions. FNS continues to provide grants, research and technical

assistance to implement farm to school efforts that improve access to local foods in the Child Nutrition Programs.

If you have questions, please contact the State agency employee assigned to your region.

c: SNP Staff