Reply to
Attn. of: CACFP-549

Subject: Child and Adult Care Food Program (CACFP) Policy Memorandum

To: STATE AGENCY DIRECTORS - Colorado DPHE, Iowa, Kansas, (Child Nutrition Programs) Missouri DH, Montana DPHSS, Nebraska ED, North Dakota, South Dakota, Utah and Wyoming ED

Attached is a summary of questions and answers that have been raised since our last CACFP question and answer memorandum, CACFP-544, dated April 20, 1998.

We will continue to compile additional information and submit it to the State Agencies as the need arises.

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Attachment
Meal Requirements

1. Q. What is the current guidance concerning milk requirements for children between the ages of 1 and 2 years old?

   A. The current guidance for this age group is whole milk only. Children in this age bracket need the additional fat and calories for optimal growth that whole milk can provide.

2. Q. When was the 4th meal discontinued, and when were State Agencies (SAs) notified?

   A. The 4th meal was discontinued August 21, 1996 when President Clinton signed the Personal Responsibility and Work Opportunity Reconciliation Act of 1996. However, the SAs were notified of the pending deletion of the 4th meal in CACFP-472/SFSP-291 dated August 13, 1996. This memorandum was inadvertently rescinded; it should be considered an active memorandum.

3. Q. Can Gerber Graduates Meat Sticks be reimbursable as a meat component for infants under 1 year of age if the meat sticks are chopped up finely?

   A. No. These are meant for children over 1 year of age. They are not reimbursable as a meat/meat alternate in the Infant Meal Pattern because they could present a choking risk in infants. Reference NTS memorandum "Commercial Infant and Other Foods Reimbursable As Meal Components in the Infant Meal Pattern" dated December 4, 1997. FNS maintains this policy regardless of whether the care giver claims that the meat stick will be chopped up before serving it to an infant. Since the manufacturer intends for this food to be consumed by toddlers, i.e., over 1 year of age, it would be inappropriate for FNS to make an exception and then risk having an infant choke on the food if, for what ever reason, it is not sufficiently chopped up.
Start-Up/Expansion/SO Administrative Funds

4. Q. Does the SA have to have receipts of expenditures prior to releasing expansion funds to sponsoring organizations (SOS)?

A. No. The bulk amount can be released to the SO, and a reconciliation conducted at the end of the grant period. Any funds for which the SO has no documentation of expenditure would be reclaimed at that time.

5. Q. Is it correct that costs related to obtaining licensing can be paid for by regular SO administrative funds or expansion funds?

A. Yes. However, both funds cannot be used for a single purchase.

6. Q. In applying for expansion funds, can an SO target 75 homes?

A. Yes. Although the funding formula is limited to 50 homes, the SA can approve an SO to target a population greater than 50.

7. Q. Can the sponsor be approved to use the expansion funds over a period of time longer than 2 months (the number of months the funds are figured from)?

A. Yes. The sponsor needs to specify what time period it plans to use and the SA needs to evaluate the reasonableness of the request. Note: CACFP-287 indicates that we do not dictate the time frame.

8. Q. Can the funds be used over 2 fiscal years?

A. Yes. Again, CACFP-287 allows the use of funds over a period of 1 year, so that would allow the funds to be used in 2 fiscal years.

9. Q. If the funds are correctly spent, but the sponsor yields no homes, can it still keep the money?


10. Q. Does an IEF have to be taken if the sponsor is generically targeting a rural or low-income area and NOT using the funds to assist providers in getting licensed?

A. No. See 226.2 of the Interim regulation.
Tiering

11. Q. If an SO reclassifies an existing home as a Tier I home based on provider's household income, when does the new Tier I classification become effective?

A. Reclassification of a currently participating home to Tier I status, whether based on updated area data (the provider did not move to a new/Tier I area) or provider's household income, may be retroactive to the first day of the approval month. The approval month is the month the income information is verified, not the month the provider submits the information. If the provider submits an application to the sponsor in April, CNP guidance specifies that the income information reported must be for the prior month (March). For all CNPs, that month's data qualifies the household for 1 year (unless the household notifies the sponsor of an increase in income). The 'assumption' is that for that year the household's income is at or below the applicable income guidelines level. Thus the household is eligible for the entire month of April because it can be assumed that the income was at the March level for the month of April. Even if the sponsor did not complete the approval process until April 26, the family's income was within the applicable income range all of April. This modifies CACFP-506, question 15 and CACFP-544, question 2.

Other

12. Q. A SA has gone to non-expiring licenses. The SA expects to allow the agreement cycle to match each provider's eligibility criteria (1 year for income eligibility, 3 years for SFA eligibility, and 10 years for census data). Can SOs hold permanent agreements with providers?

A. Yes. CACFP-376, question 5 allows for permanent agreements. However, the SA will want to ensure that SOs have a system in place for checking license status periodically, especially for those providers approved on school and census data.