Reply to
Attn. of: CACFP-560

Subject: Child and Adult Care Food Program (CACFP) Questions and Answers

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-555, dated September 15, 1998.

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

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Attachment
CHILD AND ADULT CARE FOOD PROGRAM (CACFP)
QUESTIONS AND ANSWERS
DECEMBER 1998

Audits

1. Q. A sponsor contracts with two CPA firms; one to do its accounting and another to do its audit. The Board of Directors likes one firm over the other and wants that firm to do both its accounting and audit. Is this allowable?

   A. Yes. However, it would not be appropriate for the same individual to do both functions. Nor would it be appropriate for the auditor to be subordinate to the accountant. The responsibility for ensuring adequate independence rests with the audit firm; however, if the State Agency (SA) has any questions or concerns, the SA should have the accounting firm present its case in writing. The SA can then present this to the State auditing branch for an opinion.

2. Q. A SA put out bids for auditing. The low bid came from the auditors who performed the audits for the past year. The SA found areas of poor performance and poor cooperation with these auditors. Does the SA have accept the lowest bidder?

   A. No. Part 226.22(i)(2)(ii)(E) states: "Any or all bids may be rejected when there are sound documented business reasons in the best interest of the Program."

Creditable Foods

3. Q. Is ground ostrich meat a creditable item?

   A. Yes. The revised Food Buying Guide will state 1 pound raw ostrich meat yields 11.2 ounces of meat.

4. Q. Is processed buffalo meat creditable?

   A. Yes. As long as the meat is inspected by the appropriate State or Federal agency.

5. Q. Is yucca root creditable as a vegetable?

   A. Yes. It is a tuber type vegetable similar to sweet potatoes, except it is white in color. Count is as a regular serving for sweet potatoes. Fresh peeled, cooked yucca will yield eight 1/4 cup servings per pound.
Family Day Care Homes

6. Q. A provider is declaring she is separated from her husband and wants to declare her income only. How does she establish her income for Tier I?

   A. Since the last IRS 1040 form would not reflect her current income, the provider needs to report current child care income and expenses, and alimony or child support as applicable, most likely via a ledger format.

7. Q. A day care provider is advertising that children enrolled for before and after school care can come to her house to eat lunch for free. She is claiming them for reimbursement. The school that these children attend states it has Income Eligibility Forms (IEFs) on file for free/reduced price lunches for these children. Can the provider claim these meals?

   A. No. Part 226.19(e) states, "...reimbursement may not be claimed for meals served to children who are not enrolled or for meals served at any one time to children in excess of the home's authorized capacity...". These children should eat at school since the school has a lunch program. CACFP-212 question #3 addresses this situation when the school does not have a lunch program.

Other Issues

8. Q. A Head Start program takes meals, which meet CACFP requirements, to home based participants which meet in required socialization sessions for children. Can these meals be claimed?

   A. No. Meals for Head Start participants in other than a center setting can only be claimed when the Head Start parent is approved and participating as a CACFP family day care home provider. All other CACFP participants (i.e., other nonresidential children) must be enrolled and present for child care during the meal service. Licensing requirements must be met as well.

9. Q. How is a disabled child defined?

   A. Part 226.2 under definition of Children states, "...(c) mentally or physically handicapped persons, as defined by the State...". An agency within the State, such as the Office of Civil rights, will provide the official definition.
10. Q. Is there any regulatory language for serving whole milk to children up to 2 years of age?

A. There is no regulatory language. However, *Feeding Infants, FNS-258*, page 25, under Whole Milk, states: "Skim milk or lowfat milk should not be served to babies under 1 year of age because they contain too little fat and too much protein." Both the *Nutrition Guidance for Child Care Homes* and *Nutrition Guidance for Child Care Centers* also make this statement. A SA could recommend this be extended to 2 years of age. However, no overclaim should be taken if the SA chooses to require this and it is not followed by the center or FDCH.

11. Q. Should income received for a special-needs adopted child be shown as income on the family's IEF?

A. CACFP-334 addresses differences between subsidized adoption when the child is within the guardianship of the family or when the child remains a ward of the courts. In the first instance, the child is part of the household and the subsidy should be included in the family income. Otherwise, the child is a household of one and their income is not included in the family's IEF.