Attached are questions and answers that have been addressed since the publication of CACFP-758, Questions and Answers June 2005. The numbering system coincides with the existing sequence for the Consolidated Q & A’s August 2004 and CACFP-758.

If you have questions, please contact us at (303) 844-0354.

DARLENE SANCHEZ
Regional Director
Special Nutrition Programs

Attachment
Audits

15. Q. Can a State Agency (SA) choose to perform audits on one or more of their institutions when the institution does not meet the threshold for a required A-133 audit?

A. Yes, at the SA discretion, they could conduct a limited scope audit which is called an "agreed upon procedures engagement". This type of "audit" is used when the SA wants to establish audit policy to monitor specific classes of sub-grantees or specific compliance requirements. The SA must determine standard procedures when engaging contractors to perform agreed-upon procedures engagements. The cost of the agreed-up-on-procedures-engagement is allowable and the SA can use 1% audit funds to fund the scope of work as long as the outcome is to improve Program integrity or provide program training and technical assistance. (CACFP-569)

Child Care Centers

9. Q. Can sign-in/sign-out records be substituted for hours and days in care on Child Enrollment Forms and subsequently used to do the five-day reconciliation of records?

A. Yes, as long as the sign-in/sign-out records have times and days in care.

Claims for Reimbursement

34. Q. In evaluating the number of days of a block claim, if a day care home provider does not claim for an entire day, due to illness for example, is that considered a break in the block claim pattern?

A. No, even though the provider did not claim one day, the counting for the 15 days would pick up again the next claiming day.

Cost Allowable/Unallowable

37. Q. Can a sponsor of day care homes who had been approved for close out costs submit an additional request for closeout funds past the 90 period?

A. The State Agency has the authority to disallow close out cost requests which are received past the 90 calendar days from the end of the sponsor's contract. (7 CFR Part 3019.71)
Crediting Foods

30. **Q.** Is a doctor’s statement required to serve goat’s milk as part of a reimbursable meal?

   **A.** No. In the 2001 CACFP Crediting Guide, page 8, goat’s milk does not require a Special Diet Statement or doctor’s note for children 1 year and older. The goat’s milk must be pasteurized and meet state and local standards. If goat’s milk is served to children under one year of age as a substitute for breast milk or infant formula, a Special Diet Statement is required.

Family Day Care Homes

39. **Q.** For a Sponsor of family day care homes, can the 5-day meal reconciliation be done on one meal, for example suppers, or must it be complete for all meals?

   **A.** The reconciliation must be done for all meals in the facility’s meal count, according to Regulation 226.16(d)(4).

Infant Meals

20. **Q.** If a center or home staff member has the day off but brings her infant to the center/home and returns to breast feed the infant, is the meal reimbursable?

   **A.** No. Since the staff member has the day off, the services for which the center or the provider would receive reimbursement are not being performed. However, the child may be claimed if the center or provider furnishes one other meal component in at least the minimum quantity specified in the meal pattern. (CACFP-617, #6)

Monitoring

17. **Q.** Can a State Agency include in their contract with institutions a statement that records may be taken off-site for the purpose of a SA review?

   **A.** Regulations do not prohibit a SA from requesting that records be made available to them to take off-site. Regulation 226.10(d) requires that all accounts and records pertaining to the Program shall be made available, upon request to representatives of the SA, FNS, and OIG for audit or review at a reasonable time and place. FNS would recommend that any SA policies regarding taking records off-site take into account the possible loss or destruction of records and the subsequent SA liability.
18. Q. For sponsoring organizations of centers, State Agencies are required to monitor the sponsor and 15% of the sponsored sites. Does this mean that they only have to review the Income applications, meal counts, attendance records, enrollment records for the 15% of the sites chosen as part of the review?

A. Regulation 226.23(h) states that you must review all approved free and reduced priced applications on file for the sponsor of centers. The State Agency would review other records for only the 15% of the sites they visit.

Serious Deficiency Process

7. Q. If all required forms and correspondence are sent to the Regional Office to place a provider or institution on the National Disqualified List, does the State Agency also have to send duplicate information in hard copy form by regular mail?

A. No. It is acceptable and in the interest of saving paper, all documentation for the Serious Deficiency process may be sent electronically to the Regional Office.

8. Q. Is the following procedure from the August 2004 Consolidated Q & A’s current? “Can a center which has been disqualified (put on the NDL) reapply for the program? Yes. However, the SA must obtain complete corrective action and obtain FNS RO approval prior to approving the application”.

A. No, this procedure has changed. Requests will still initially come to the Regional Office, but to remove an institution from the NDL, it is required that the approval come from FNS at the Headquarters level.