

# **School Year 2021 COVID-19 Auditing Guidance for CHILD AND ADULT CARE FOOD PROGRAM (CACFP) At Risk Afterschool Meals Program**

## **GENERAL INFORMATION**

- Daily Attendance Record and Monthly Meal Count Records are required. POS is allowed for on-campus Menus.
- HACCP Standard Operating Procedures for Food Safety and Record Keeping are required.
  - If your HACCP plan states that you utilize a Production Record for time/temp control, continue to do so.
- Receipts and Inventory must be maintained.
- New Sponsors are required to be reviewed within the first 90 days of operation if operating 5 or more sites.
- Sponsor training required if operating more than one site for all staff members. All training must be documented.
- Requires budget within online agreement.
- Requires separate accounting codes for CACFP with fund source 5199, revenue code 5199 and expense function code 9341.
- All meals free to persons 18 years or younger and persons 19 or older with a physical or mental disability, as defined by the State.
- Journal entry required for transfer of inventory and staff salaries. Time sheets must be maintained for staff.
- **Reimbursement: Afterschool Snack**  
\$.96; Lunch/Supper: \$3.51 (Plus \$0.2450 cash-in-lieu of commodities); Breakfast: \$1.89

## **GUIDANCE RELATED TO COVID-19 NATIONWIDE WAIVERS AND MEMOS**

- **Meal Service Time Flexibility – Waiver Response #1, #23, #34 – expires June 30, 2021**
- **Non-congregate Feeding – Waiver Response #2, #22, #33 – expires June 30, 2021**
- **Activity Requirement – Waiver Resp #3 – expired June 30, 2020**
  - All sites are now required to have a supervised educational or enrichment activity offered, and it can be virtual
- **Meal Pattern Flexibility - Waiver Resp #4, #13, #24, #26, #36, #70 – State Agency Approval–exp. June 30, 2021**
  - Operators must get advance approval from their State agency.
  - State agencies can only grant this waiver on case-by-case basis and must inform their regional office when, where, and for which components the waiver is in effect.
  - USDA instructs states to consider if the request is due to supply issues.
  - **Resp #70** Sponsors may serve one type of milk without requesting a State waiver
- **Parent/Guardian Pickup – Waiver Response #5, #25, #35 — expires June 30, 2021**
- **Onsite Monitoring – Waiver Response #7, #8, #20, #27, #28, #39, #40 – expires September 30, 2021**
  - **Response #7 & #27**
    - Allows sponsors to monitor facilities two times (instead of three) this fiscal year, and only one must be unannounced.
    - Waives the requirement for at least one unannounced review to include the observation of a meal service.
    - Waives the requirement that no more than six months elapse between reviews.
    - Allows new facility reviews to be done by desk audit.
    - Sponsors must continue to ensure integrity to the maximum extent practicable through remote activities, such as through desk audits.
    - Unlike previous monitoring waivers for CACFP sponsors, this does not waive other monitoring.
  - **Response #8, #28 & #40**
  - Waives the in-person component of the State Agency’s required monitoring activities. **State Agency Only**
  - **Response #20**
    - Waives all monitoring requirements for state agencies **State Agency Only**
    - USDA encourages states to prioritize next year the institutions scheduled to be reviewed this year.
    - States must continue to ensure integrity to the maximum extent practicable through remote activities, such as through desk audits.
  - **Response #39**
    - Waives onsite monitoring requirements for sponsors.

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- USDA encourages sponsors to ensure Program integrity and to the maximum extent practicable, continue monitoring activities offsite through desk audits
- This does not waive other monitoring requirements (like the annual number or how many must be unannounced).
- **60-Day Reporting Requirement – Waiver Response #12 – No expiration date**
  - This now allows 90 days rather than 60 days for submission of reports.
  - States and operators are encouraged to meet the original deadline wherever possible.
- **CACFP 06-2020 Q&A Related to the CNP Monitoring and Reporting Nationwide Waivers**
  - New sponsors may be approved through off-site pre-approval visits.
  - **Monitoring Clarification:** State agencies may postpone the scheduled review of currently closed CACFP institutions if three years has not lapsed between reviews.
    - Sponsors may conduct **two** reviews of CACFP facilities
    - Only **one** facility review is required to be unannounced.
      - Waives observation of meal service on unannounced review.
      - Waives that no more than six months may lapse between reviews.
    - Sponsor must conduct at least one review during each new facility's first four weeks of operation, desk audit is allowed.
  - CACFP Attendance Records: Not required if children are not in attendance. Daily attendance records are required for eligible children attending the center.
  - For those not in daily attendance, plans must be in place for ensuring duplicate meals are not distributed.
- **CACFP 07-2020 – Q&A related to CNP Response #1-#3 Mealtime, Non-congregate Feeding & Meal Pattern Flexibility**
  - Clarifies that CACFP operators may distribute multiple meals for multiple days.
  - Operators may serve items in bulk if they include instructions.
  - Waiver Impact Reports must be submitted within a year of the waiver.
  - All locations of meal service must be approved on the online agreement.
  - Suspends meal service times.
- **CACFP 08-2020 Q&A Guidance related to Meal Service during Coronavirus**
  - **Meal delivery direct to homes:** May be approved by State Agency
    - Meal delivery option is only available and reimbursable for enrolled children.
    - Allows direct to home delivery via mail or delivery service, and hand delivery by school staff, volunteers, community organizations or others.
    - Sponsor must obtain written consent from households and adhere to confidentiality guidelines.
    - Postage or delivery fees are allowable expenses.
    - Adult or child does not need to be present for shelf stable meals.
    - Meals do not need to be shelf stable for meal delivery, but food safety requirements must be met.
  - Meal service times are waived.
  - Confirms SFAs may operate two programs if different meals are served.
  - Allows two meals per day, per child up to one week at a time.
  - Meals may be served during weekends and holidays.
  - Public notification of all sites is required.
  - Accommodations for limited English proficiency, language assistance or other special needs.
  - Sponsors may keep operations going even if schools implement SFSP or SSO and they are allowed to distribute multiple meals in conjunction with other programs.
- **CACFP 09-2020 Q&A related to Meal Service during Coronavirus:**
  - Sites do not have to be a closed site and Non-Congregate waiver applies.
  - Confirms CACFP meal delivery guidelines.
  - Head Start programs may only distribute meals to children who were already receiving meals through CACFP or the National School Lunch Program (NSLP).
  - Clarifies that pre-approval visits by State Agency may be conducted through desk audit.
  - Allows two meals per day, per child up to one week at a time.
  - Meals may be served during weekends and holidays.
  - Public notification of all sites is required.

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- **Nondiscrimination Statement** is required on all printed and electronic program materials available to applicants, participants and potentially eligible persons for public information, public education, or public distribution. If the size of the material is too small to include the full statement, the material must, at a minimum, include the following statement in print in the same font size as the main text: “This institution is an equal opportunity provider.” On websites, the Nondiscrimination Statement (NDS) or a link to it, must be included on the home page of the program information.
- Accommodations for limited English proficiency, language assistance or other special needs.
- **CACFP 11-2020 Q&A related to requirements and elements of the law addressed by waiver**
  - Allows CACFP to continue through unanticipated school closures.
  - Waivers and flexibilities are extended.
  - Meal delivery guidelines still apply.
- **CACFP 12-2020: Q&A Related to Food Service Mgt Company Contracts and Allowable Costs during pandemic**
  - CACFP was not included in the Nationwide waiver for FSMC contracts because regulations do not have similar restrictions on the duration of contracts. However, flexibilities apply to all CNP Programs including CACFP.
  - Guidance for allowable expenses and contract extensions.
  - Confirms that costs for meal deliveries are allowable and all such purchases must continue to meet the required criteria of being reasonable, allocable, and necessary.
- **CACFP 13-2020: Q&A Related to Schools Re-opening.**
  - Making meals available for all enrolled children including remote learners.
  - Providing enrichment activity packets to send home.
- **CACFP 13-2020: Q&A Related to SFSP/SSO Operations**
  - Confirms that both school and non-school sponsors may operate both summer meals and CACFP At-Risk Afterschool concurrently.
- **Area Eligibility – Waiver Response #58, #68 – expires June 30, 2021**
  - Waives the requirement that CACFP At-Risk Afterschool sites be located within the attendance zone of a school where at least half of students are eligible for free or reduced-price meals.
  - State agencies must have a plan for targeting benefits.