TO: Child and Adult Care Food Program Institutions

FROM: Kyle L. Guerrant, Director
Office of School Support Services

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SUBJECT: Available Flexibilities for CACFP At-Risk Sponsors and Centers Transitioning to Summer Food Service Program (SFSP)

Organizations currently participating in the At-Risk Afterschool meal components of the Child and Adult Care Food Program (CACFP) are well-positioned to offer summer meals. Although CACFP At-Risk Afterschool meals may not be served during the summer months, these organizations may be eligible to serve summer meals through the Summer Food Service Program (SFSP) under the National School Lunch Program. The United States Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) encourages participation in both programs so as to establish a year-round presence in the communities in which they serve. Previous guidance highlighted provisions to simplify SFSP application procedures (CACFP 03-2012: Simplifying Application Procedures in the Summer Food Service Program, October 31, 2011). This memorandum highlights existing flexibilities available to CACFP institutions to simplify their participation in SFSP and may be viewed at http://www.fns.usda.gov/cnd/Care/Regs-Policy/PolicyMemoranda.htm.

Sponsor Application Requirements
SFSP institutions currently in good standing are not required to submit further evidence of financial and administrative capability when applying for CACFP participation. Sponsors considered in good standing are those that are not currently seriously deficient in their operation of any Child Nutrition Program (CNP).
Agreements
State agencies that administer more than one USDA CNP are required to enter into a single agreement with School Food Authorities (SFAs) with respect to the administration of any combination of the CNPs [7 CFR 225.6(e)].

In Michigan, all applicants to the CNP apply through the Michigan Electronic Grant System Plus (MEGS+). SFAs that wish to participate in SFSP or CACFP must complete the portion of the MEGS+ application to collect program specific information.

Site Eligibility
CACFP At-Risk Afterschool centers must establish area eligibility through school data [7 CFR 226.17a(i)]. Once area eligibility has been established, it is valid for a period of five years and may be used to demonstrate eligibility for other CNPs. A CACFP At-Risk Afterschool meal center applying to participate in SFSP is not required to re-establish area eligibility.

Health and Safety Inspections
Sites must comply with local and state health and safety standards. In cases where the local health and safety inspection standards for At-Risk Afterschool centers and SFSP feeding sites are the same, Michigan Department of Education (MDE) will accept documentation of a current inspection obtained by a sponsor for either program.

Training
At-Risk Afterschool centers in good standing are not required to attend training prior to submitting an SFSP application. However, administrative staff must be informed of SFSP requirements and are required to attend sponsor training prior to beginning program operations.

Monitoring Requirements
SFSP sponsors are required to visit each site at least once during the first week of program operation [7 CFR 225.16(d)(2)]. MDE may waive this requirement for SFSP in good standing in CACFP and National School Lunch Program (NSLP), respectively.

Sponsors that operate SFSP and CACFP At-Risk meals are not required to monitor their sites following the SFSP requirements and then monitor those same sites again following the CACFP requirements during the school year. Instead, such sponsors may follow the CACFP monitoring schedule year-round. The sponsor may choose the CACFP monitoring schedule that requires three annual reviews, one in the summer and two during the school year. One summer review and one school year review will be unannounced and must include a meal observation. The summer review will utilize SFSP requirements. One of the two school year reviews will be an unannounced review, will include a meal service observation, and must review CACFP requirements.
Financial Management
A sponsor’s excess funds from either CACFP or SFSP may be used in its operation of other CNP(s). Therefore, if at the end of the school year, a sponsor has excess reimbursement from its operation of a CACFP At-Risk Afterschool meal program, those funds may be used for allowable costs in its operation of SFSP. FNS strongly encourages sponsors to first exhaust their SFSP funds before allocating excess funds to another CNP.

If you have any additional questions concerning this memorandum, contact CACFP at 517-373-7391 or go to http://www.fns.usda.gov/cnd/Care/Regs-Policy/PolicyMemoranda.htm to view this and other referenced federal guidance.