

CACFP Considerations for Program Year 2021 Q & As

Sponsor Site Monitoring Requirements

Q: What are the elements of a desk review for Site Monitoring?

A: A desk review must cover all applicable sections of the Site Monitoring Form for CACFP that are required for an onsite monitoring visit. Multi-Site sponsors must collect relevant records such as menu documentation, training documentation, attendance records and enrollment documentation (if applicable). USDA encourages sponsors to use technology to conduct the meal observation. Multi-Site sponsors may use Zoom, FaceTime, Facebook Messenger, Photographs or other digital means to observe site staff/providers conduct point of service meal counts and to ensure the meals are meeting meal pattern. If there are any questions that you cannot answer, monitoring staff must document an N/A if the question does not apply, or monitoring staff are unable to answer due to the nature of a desk review and give a reason as to why the question(s) cannot be answered.

Q: In the past, only one visit per year could be scheduled/announced . If we are going to utilize a virtual means such as FaceTime during the visits it would mean we would need to schedule that. Does the one scheduled visit per year limit still apply?

A: For FY 2021, the unannounced review requirement is in effect. Two of the three required reviews must be unannounced. The [September issue of the Knowing and Growing](#) has information on conducting monitoring visits as a desk review and includes tips on how to conduct an unannounced desk review. For a desk review to be considered unannounced, site staff must not be notified prior to the request for documentation. For example, the monitor calls the site staff on Monday morning for an unannounced visit and requires documentation to be submitted by noon and staff to be available to share live video of the lunch meal service that day. Each multi-site sponsor is encouraged to develop a procedure for how unannounced desk reviews will be addressed.

Renewals for CACFP

Q: What steps, if any, does a sponsor need to take to renew the application for FY 2021 if the CACFP program is not currently running due to COVID?

A: Instructions were sent out to CACFP sponsors in September about what steps to take during renewals based on their organization type and plan for FY 2021 operations. At this point in time, if your organization believes that you will be operating the CACFP at any point within FY 2021 (October 2020 – September 2021), please move forward with renewal and select at least one month of operation on the site information sheets. This will help Child Nutrition Specialists to prioritize renewals as they are submitted. For example, if your organization does not believe it will operate the program until February 2021, specialists will be less insistent in getting fully accurate site information sheets, documents, etc., as quickly as if you were starting operations in October 2020. The key factor that we need to have in CNPweb is that your organization's plans for CACFP operations are in the system and approved before you actually start operating CACFP. The special renewal edition of our Knowing and Growing Newsletter was released in September and discussed Renewals for FY 2021.

Summer Food Service Program Renewals will be happening at the same time as CACFP renewals, so allowing staff to prioritize the most urgent program renewals, e.g. those that are currently operating, will be very helpful.

Q: What does a sponsor need to do if health and fire inspectors are not going out to conduct inspections due to COVID?

A: ODE CNP is asking for some form of documentation that the sponsor has communicated with the proper departments and that those departments have communicated with your organization that they are not physically inspecting sites currently, but that the sponsor has the go ahead to continue operations.

Q: Are CEP schools eligible for CACFP, or do we need to use actual eligibility of students? For example, our eligible CEP schools might be 48% direct cert, so less than 50%.

A: CEP schools are not automatically eligible for CACFP. The school's site level Identified Student Percentage (ISP) is used to determine eligibility. This ISP is multiplied by a factor of 1.6 to determine if the school meets the required 50% or above free and reduced percentage to participate in CACFP. In addition, current CACFP sponsors that wish to add a site that is below the 50% threshold, may submit a request, to their Child Nutrition Specialist, to allow this site to participate under the Nationwide waiver of CACFP Area Eligibility for At-Risk Afterschool.

At-Risk Afterschool Supper Programs

Q: A CACFP At-Risk Afterschool Program Sponsor is providing meals via Summer Food Service Program (SFSP) or Seamless Summer Option (SSO). Can they also offer CACFP At-Risk Afterschool meals at the same time?

A: Yes. Sponsors will need to speak with their assigned Child Nutrition Specialists to make those arrangements. Afterschool meals and/or snacks are encouraged to be provided afterschool. However, if CACFP At-Risk Afterschool meals are provided at the same time as breakfast and lunch through SFSP/SSO, sponsors will need to make sure that an educational/enrichment activity is provided with the At-Risk Afterschool meals, and let families know that these meals and/or snacks are meant to be consumed after school.

Q: Do we have to have a roster for students that are receiving supper meals via bus routes?

A: It depends how your program is set up. If you are a program that has enrolled participants, you can use a roster as you will readily have one available and the program provided is meant for those enrolled participants. If you are a school district that operates SFSP and you are providing meals via head count; you can use a head count when providing meals. Most importantly, you will want to ensure that you are targeting enrolled participants and that those participants have an opportunity to participate in the enrichment or educational activity that is appropriate for their education level.

Q: If we have a hybrid mix of bus routes and kids in classroom can we distribute supper meals to kids as they head home?

A: Yes. Sponsors just need to make sure that the enrichment or educational activity is included. The activity can be provided onsite or as a worksheet or link provided in their meal sack. Activities must be included for onsite, as well as offsite participants, though the activities for each group do not need to be identical.

Q: In a bus delivery model, does there need to be some form of enrichment in each bag, each day?

A: The educational/enrichment activity could be in each bag, each day or it could be a weekly packet handed out at the beginning of the week. Sponsors will need to demonstrate that there is an activity/program being offered to participants for each day that meals and/or snacks for the Afterschool At-Risk program are provided.

Q: Can the CACFP At-Risk Afterschool educational/enrichment activity be available through a link on the sponsors website?

A: Yes. However, sponsors must provide written instructions with the meals and/or snacks to ensure participants are aware of the activity and how to access it.

Q: Can virtual homework clubs run by SUN school or other partners count as the offered At-Risk Afterschool education/enrichment activity?

A: Yes. However, sponsors must ensure that there are age appropriate opportunities provided for all the age groups that meals are served to. Also, sponsors must provide all participants receiving meals the information for logging on to this virtual homework club or other virtual activities

Meal Distribution Plan for Non-Congregate Meals

Q: What is the process for completing a Meal Distribution Plan?

A: Sponsors must submit the Meal Distribution Plan (MDP) form if they intend to serve non-congregate meals. The form must include specific information such as meal types to be served, type of distribution method (i.e. grab and go, bus route, home delivery), and days of meal distribution. In addition, sponsors must provide their methods for counting and claiming and a description of how the overall meal service will occur. A Child Nutrition Specialist will review the MDP and ask any clarifying questions or request more information if necessary. Once this process is completed, the sponsor will be approved to provide meals through a non-congregate distribution method.

Q: A Childcare center is doing Emergency Child Care and wants to know if they can do non-congregate feeding for enrolled children not on site.

A: Yes, if you have children enrolled in your program that are currently not able to be in your care, due to a limited number of slots, you may provide meals non-congregately to those children. You will need to connect with your Child Nutrition Specialist and complete a Meal Distribution Plan. Remember, these participants must be included on the One Month Enrollment Roster (OMER).

Q: If a Head Start is providing meals non-congregately through bus route or home delivery, do these sponsors need to contact the school district in the area?

A: It is a best practice that the sponsor contact the area school district(s), especially if that school district is providing the Summer Food Service Program and delivering meals to families in the area. It is highly recommended that both school districts and non-profit organizations communicate with parents about ensuring integrity of the program. Sponsors only allowed to provide one meal, per meal type, per child, per day. This should be shared by both the Head Start and the school district to families. Communication is key to ensure that there is no overlap in the meals being served. As a reminder, Head Starts may only deliver CACFP meals and/or snacks to enrolled participants. If the school district is offering SFSP, it will be important to ensure that the district is not providing the same meals to those enrolled participants.

Administrative Reviews

Q: Will ODE be conducting Sponsor Reviews this program year? Will these be in person or virtual?

A: Yes, ODE CNP will be conducting administrative reviews of some CACFP sponsors during FY 2021. USDA released a waiver that allows State Agencies to do all monitoring visits as desk reviews. Sponsors may be contacted at any time during FY 2021 by a Child Nutrition Specialist to participate in an administrative review of their organizations CACFP operations.

Q: What is the Administrative Review process going to look like?

A: Sponsors will be asked for the same type of documentation that they are asked for when ODE CNP Child Nutrition Specialists are on site for a review. This will include, if applicable, OMER records, Child Enrollment forms, Confidential Income Statements, Menu documentation, training documentation and additional supporting documentation as assigned. The difference is that these documents will be sent to your specialist electronically via secure file transfer. Since ODE CNP will not be onsite to observe a meal, pictures of meals, storage and preparation steps or videos of meal service may be requested.

ODE CNP Child Nutrition Specialists will review the submitted documentation and schedule time(s) to talk with sponsor staff during the review period. All meetings will be conducted virtually via phone calls or a virtual meeting platform (e.g. GoToMeeting, Microsoft Teams, etc.). Due to the format of the desk review, FY 2021 administrative reviews will take longer to complete than an onsite review.

Virtual Services/Learning

Q: If we are doing virtual services, do we still need to do an OMER

A: Any programs normally required to have an OMER will need to complete an OMER for FY 2021, even if the program is only providing virtual care. The OMER is how a sponsor's claim rate is determined for certain programs, so an OMER is required for these programs in order for ODE CNP to pay the monthly reimbursement claims. ODE CNP has an electronic CACFP Child Enrollment Form (CEF) that can be sent to and completed by parents electronically. If you need further information, please work with your Child Nutrition Specialist.

Q: Do CACFP Child Enrollment Forms or adult enrollment documentation need to be completed for virtual services?

A: Yes. As a reminder for those that complete OMERs, you will need both Confidential Income Statements (if a family completes one) and the CACFP Child Enrollment Form or adult enrollment documentation for all participants listed on the OMER.

Q: When a parent completes the CEF for children not physically in care – how should they complete the form in terms of days and meals required?

A: A CEF is a plan, so if they are not physically in care, please document this on the bottom of the form and initial it. Fill out the “plan” for the days and meals that the child would be in care and receiving meals. If a child is attending virtual services, make sure that the days and meals for those virtual services are indicated on the CEF.

Q: Who should be included in the OMER if not all children are currently enrolled in physical care?

A: If meals are only provided to participants in care onsite, sponsors must develop an OMER with children enrolled AND attending onsite care. Sponsors may revise the OMER once more children come into care. If a sponsor provides non-congregate meals to children not in physical care, include all children that have a current and valid enrollment form on the OMER.

Q: Our OMER will be low on children as we are not allowed to serve as many children at this time. Will we have to redo the OMER once COVID restrictions are lifted?

A: Sponsors may, but are not required to, revise their OMERS once COVID restrictions are lifted. If a sponsor would like to revise their OMER, they should contact their Child Nutrition Specialist.

Onsite Meal Service

Q: ELD guidance has said that family style meals can happen if one staff member serves everyone instead of having children serve themselves from communal bowls. Will this be permissible?

A: Per USDA, family style meal service is where the child is offered all required components and serves themselves. If a teacher is serving the children, it is not Family Style, it is restaurant style. In this case, teachers must serve participants the full amount of each required component in order for the meal or snack to be reimbursable.

Q: If we are utilizing a hybrid model, do we need to offer grab/go options for children who are enrolled to a site but attend two days per week? Or can we make the decision to only serve classrooms meals?

A: If you are a CACFP sponsor and only plan to offer in-classroom meals, you are not required to offer grab and go options for participants who are enrolled but not attending the classroom session. If the organization chooses to do any kind of non-congregate feeding (take home after the end of the day, grab and go, home delivery, etc.) then meals must be offered to all enrolled participants regardless of whether they are in the classroom or not.

Q: Do sponsors conducting onsite meal service have to use disposable containers, dishes and utensils?

A: Contact your local health department to determine whether they require disposable containers, dishes, and utensils for your program.

Allowable costs for non-congregate feeding

Q: Can we buy baby formula and be reimbursed by CACFP?

A: If you are providing reimbursable meals to infants and need to purchase baby formula as part of those reimbursable meals, this cost is allowable as a CACFP cost and claim reimbursement dollars may be used to purchase the formula. As a reminder, sponsors are reimbursed based on the number of meals claimed, not how much is spent on meal components.