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DEPARTMENT OF EDUCATION  
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**FISCAL YEAR 2013  
CHILD AND ADULT CARE FOOD PROGRAM  
OPERATIONAL MEMORANDUM #32**

**TO:** Child and Adult Care Food Program Institutions

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

**DATE:** September 12, 2013

**SUBJECT:** **Transitioning from the Summer Food Service Program to Child and Adult Care Food Program At-Risk Afterschool Meals**

**ACTION:** **Applicable only for Sponsors in both SFSP and CACFP**

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) has issued guidance that highlights flexibilities available to Summer Food Service Program (SFSP) sponsors transitioning into the At-Risk Afterschool Meals component of the Child and Adult Care Food Program (CACFP) during the school year. Many existing SFSP sites are well-positioned to offer afterschool meals during the school year through CACFP. Both organizations and communities benefit when meals are offered to children in low-income communities year-round. Organizations benefit from the ability to hire year-round staff, having a continuous flow of reimbursements provides additional financial stability, and they receive recognition in the community as a stable source of services. Communities benefit by having a partner that provides year-round nutrition services for children which brings increased federal funds into the local economy.

**Applications**

In an effort to streamline participation in CACFP, FNS is waiving some application requirements for SFSP sponsors in good standing that wish to apply to participate in CACFP for the first time. Sponsors considered in good standing are those that are not currently seriously deficient in their operation of SFSP.

Each new CACFP institution is required to meet the performance standards outlined in 7 CFR 226.6(b)(1). Because SFSP sponsors are already familiar with operating a Child Nutrition Program (CNP), they are not required to provide documentation that they have practices in place to ensure that the meal service, recordkeeping, and

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other program requirements are performed properly. Successful operation of SFSP provides evidence of this performance standard.

The Michigan Department of Education (MDE) does not require budgets as part of the CACFP application unless the institution intends to administer programs in addition to at-risk afterschool, such as a day care center, Head Start, or Great Start Readiness Program (GSRP). In an effort to determine financial viability, MDE will review fiscal information submitted for other CNPs.

The following are required for participation in SFSP and therefore are not required to be submitted as part of the CACFP application process:

- *Confirmation of Area Eligibility of Centers:* SFSP sites that establish area eligibility through the use of school data may use their area eligibility determination for SFSP and CACFP afterschool meals for a period of five years. There is no need to re-establish area eligibility for CACFP. SFSP sites simply report in the CACFP application the eligibility they already established in SFSP. However, because area eligibility for CACFP At-Risk Afterschool Meals must be based on school data, SFSP sites that established eligibility using Census data or based on income eligibility forms must provide additional documentation indicating that they are area eligible based on school data.
- *Non-discrimination Statement/Media Release:* SFSP sponsors are not required to resubmit a non-discrimination policy statement to participate in the CACFP. This change will be effective with the Fiscal Year (FY) 2015 CACFP certification. Additionally, a media release is issued annually by MDE for all CNPs. An additional media release is not required to be submitted.
- *Health and Safety Inspections:* Where the local health and safety inspection standards for at-risk afterschool centers and SFSP feeding sites are the same, MDE will accept documentation of a current inspection obtained by a sponsor for SFSP.
- *Documentation of Tax-exempt Status:* Private non-profit organizations are not required to resubmit documentation of tax exempt status for CACFP when such documentation was submitted for purposes of participation in SFSP.

As a reminder, institutions are no longer required to apply to CACFP annually. Once the initial application has been approved, only an annual certification is required along with some limited information (see USDA guidance [CACFP 19-2011, Child Nutrition Reauthorization 2010: Child and Adult Care Food Program Applications](#)).

### **Agreements/Application**

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 operation of any combination of the Child Nutrition Programs [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 at-risk afterschool meals must complete the CACFP portion of the MEGS+ application to collect CACFP specific information.

### **Training**

SFAs participating in the NSLP are familiar with operating a Federal Child Nutrition Program and will not be required to attend training prior to submitting a CACFP application. Similarly, members of the food service staff who receive meal service training under the NSLP will not be required to attend separate CACFP training on meal services.

However, administrative staff must be informed about program requirements and will be required to attend the necessary training. Additionally, SFAs are not required to conduct CACFP preapproval visits to schools already participating in NSLP.

### **Monitoring Requirements**

CACFP sponsors must conduct pre-approval visits to each center to discuss program benefits and requirements and ensure that the facility is capable of providing the proposed meal service. MDE will waive the requirement for pre-approval visits for centers that operated SFSP sites.

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. If sponsors choose to follow the CACFP monitoring schedule year-round, one of the three annual reviews must occur during the summer, must review for SFSP requirements, must include the review of a meal service, and must be unannounced; two reviews must occur during the school year, must review for CACFP requirements, at least one must include the review of a meal service, and at least one must be unannounced.

### **Financial Management**

A sponsor's excess funds from either CACFP or SFSP may be used in its operation of other Child Nutrition Programs. Therefore, if at the end of the summer a sponsor has excess reimbursement from its operation of SFSP, those funds may be used for allowable costs in its operation of CACFP.

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 the federal guidance.