

Child and Adult Care Food Program (CACFP) Policy & Procedure Manual

Center Based Sponsors

Oregon Department of Education Child Nutrition Programs

March 2026 Edition



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Foreword: About this Manual

The **Oregon Department of Education Child Nutrition Programs (ODE CNP)** developed this manual to guide **sponsors** of child care centers, Head Start programs, afterschool programs, outside school hours child care, emergency shelters and adult day care centers in the day-to-day operation of the Child and Adult Care Food Program (CACFP). **Responsible principals** of each sponsor are responsible for knowing the information and are urged to read all the material carefully and share it with their staff members responsible for CACFP operations.

Chapters contain ODE CNP policy and guidance based on Federal and State regulations, instruction, and guidance. When a change occurs, ODE CNP will revise the appropriate sections of this manual online, highlight the change, and issue a notification to affected sponsors regarding the revisions.

All sponsoring organizations that have an agreement with ODE CNP to administer the CACFP must follow the policies and guidance set forth in this manual.

Materials in this manual are also covered in a series of training videos available on the [ODE CNP CACFP Training page](#) under the section for CACFP Policy & Procedure Manual Training for Center-Based Sponsors.

Guide to Navigating the CACFP Center Sponsor Manual

The CACFP Center Sponsor Manual has been designed with a number of features to facilitate easy navigation through the entire document:

- 1) Each line in the main Table of Contents links directly to the chapter or section referenced.
- 2) Each line in each chapter's Table of Contents links directly to that section of the chapter.
- 3) There is a link back to the main Table of Contents at the end of each chapter's Table of Contents. The same link is also located at the end of each chapter.
- 4) When you click on a link to a document within a chapter you will be taken to one of two places:
 - a. If the document has a single version or translation, the document will open
 - b. If the document has multiple versions and/or translations, you will be taken to the webpage that has all versions and/or translations available
- 5) When you have completed viewing a document that you have linked to, click the back arrow to return to your previous location within the manual.
- 6) When a different chapter is referenced within a chapter, the link will take you to the Table of Contents for the new chapter.
- 7) When you click on a link to a website external to the manual, you will be taken directly to that website. Click the back arrow to return to your previous location within the manual.
- 8) Updated items or revised information in the current version of the manual are highlighted.

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1. mail:
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. fax:
(833) 256-1665 or (202) 690-7442; or
3. email:
Program.Intake@usda.gov

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Free language assistance, auxiliary aids, and/or accommodations are available upon request. Please contact (971) 208-0490 or email ode.cnp@ode.oregon.gov.

ODE CNP Contact Information

ODE CNP staff conducts administrative reviews and can provide technical assistance and training for sponsors. The State office contact information is:

Oregon Department of Education Child Nutrition Programs

255 Capitol St. NE, Salem, OR 97310

Phone: (503) 947-5894

E-mail: ode.communitynutrition@ode.oregon.gov

Websites:

[ODE CNP Main Page](#)

[ODE CNP CACFP Page](#)

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Section A – Basic Information About CACFP

What is the CACFP?

The Child and Adult Care Food Program (CACFP) is a voluntary Federally funded program that provides reimbursement for serving nutritious meals and snacks to eligible participants in child care centers, family day care homes, Head Start programs, afterschool programs, emergency shelters and adult day care centers. The United States Department of Agriculture (USDA) funds the Oregon Department of Education Child Nutrition Programs (ODE CNP) to administer the CACFP in Oregon. [For information on the application process see Chapter 2 Application and Renewal](#)

Why is this Program Provided?

The purpose of the CACFP is to improve the quality of child and adult day care for low-income families by providing assistance in offering nutritious meals and snacks served to eligible participants. Providing nutritious meals to children and adults helps promote the health of our nation.

The CACFP can improve the nutritional quality of meals and snacks in three ways.

1. The program provides required guidelines, including portions to be served, for meals and snacks to participants
2. The program provides monetary (reimbursement) assistance to eligible providers to help pay for meals that meet USDA requirements.
3. The CACFP requires training and monitoring by ODE CNP and sponsors.

Program Goals

- To increase access to nutritious meals and snacks
- To promote healthy eating behaviors
- To improve the quality of child and adult day care, making it more affordable for low-income families

Benefits to a Participating Sponsor

A sponsor is an organization that has an agreement with the Oregon Department of Education Child Nutrition Programs (ODE CNP) to operate the CACFP. Sponsors receive monthly reimbursements for serving nutritious meals and snacks to enrolled participants. ODE CNP provides technical assistance to sponsors to assist them in meeting program requirements and includes, but is not limited to, menu planning, food preparation, food service sanitation, and record keeping.

Eligible Organizations

The following types of organizations are eligible to apply to participate in the CACFP:

- Public institutions – municipal, state, Federal or tribal organizations. For example, a public school district, a parks and recreation department, or a community college.
- Non-Profit organizations – organizations with IRS tax-exempt status such as community child care centers, afterschool programs, teen parent programs, Head Start programs.
- For-Profit organizations – Also referred to as “Proprietary”; these are organizations that do not have IRS tax-exempt status, and may be a limited liability corporation (LLC), corporation, sole proprietorship, or partnership. See [Chapter 19 For-Profit Sponsors](#) for additional requirements for For-Profit organizations that can operate the CACFP.

Site Eligibility

All sites participating in the CACFP are eligible based on one of the following methods:

1. Maintaining a current Oregon Child Care Licensing Division (CCLD) Certificate; or
2. Obtaining/maintaining current Approval from another Federal, State, or local government entity; or
3. Completing CACFP Alternate Approval requirements

Eligible Participants

CACFP serves the following participants enrolled in non-residential day care programs or Emergency Shelters:

- Children aged 12 years or under
- Children and youth aged 18 or under if participating in At-Risk Afterschool programs or Emergency Shelter programs.
- Children of migrant workers aged 15 or under
- Participants with mental or physical disabilities in child care when the majority of enrollees are age 18 or under
- Adults participating in qualifying adult day care centers who are functionally impaired or 60 years of age or older

Reimbursement Rates

Meal reimbursement is based on established reimbursement rates for each meal type, and not based on actual expenses. The reimbursement rate applied to each meal served is based on the income of the enrolled participants and the type of meal served (breakfast, lunch, snack, or supper). Higher meal reimbursement is paid for meals served to participants with lower household income. At-Risk Afterschool Meals & Snacks programs and Emergency Shelter programs receive reimbursement at the highest reimbursement rate for all meals and snacks served. The Federal government adjusts the meal reimbursement rates every year. The new rates are effective every year on July 1.

Sponsors participating in the CACFP will also receive an additional amount of reimbursement as Cash-in-Lieu (CIL) of commodities. USDA commodities are not available to CACFP sponsors at this time. The CIL rate is paid for each lunch and supper claimed for reimbursement by a sponsor. See the [Reimbursement Rates](#) webpage for the current Cash-In-Lieu rate.

Meal Pattern Requirements

Sponsors must meet program meal pattern requirements to receive reimbursement. CACFP meal pattern requirements depend on age of participants. The four meal patterns are:

- Infant – Birth to 11 months
- Children – 1 to 12 years of age
- Children – 13-18 years of age
- Adult participants

See [Chapter 9 Meal Pattern Requirements](#) for more information.

Maximum Reimbursable Meals and Snacks Sponsors Can Claim

In general, sponsors may be reimbursed for a maximum of either two meals and one snack, OR two snacks and one meal per participant per day. At-Risk Afterschool Meals & Snacks programs may be reimbursed for a maximum of one snack and one supper per participant per day. Emergency Shelter programs may be reimbursed for a maximum of any three meals per participant per day.

CACFP Federal Regulations

Title 7, Part 226 of the Code of Federal Regulations ([7 CFR 226](#)) in addition to [2 CFR Chapter IV](#) are the primary Federal regulations which governs the operation of the Child and Adult Care Food Program. A full list of governing regulations is included in the State Agency-Sponsor Agreement. Sponsors can find the regulations on [the ODE CACFP Memos, News, and Regulations website](#).

Section B – Record Keeping Requirements

All CACFP records must be kept for three years plus the current program year, or until all audit or review findings are corrected, whichever is longer. Maintaining compliance with CACFP takes planning. Below is a sample of the record keeping requirements. Please note, the list below is not inclusive of all Program record keeping requirements and is merely a sample. Sponsors must maintain the following records, if applicable, for the program types operated:

- Confidential Income Statements (CIS)
- Child Enrollment Forms (CEF)
- Nonprofit food service receipts
- One Month Enrollment Report (OMER)
- Daily point-of-service meal counts
- Daily attendance
- Menus and supporting documentation
- Combination Food Recipe Form with instructions
- Medical Statement to Request Special Meals and/or Accommodations
 - Meal Preference Request Form
- Infant Records
- Site Monitoring Report form
- Civil Rights
- For Profit Eligibility documentation
- Racial Ethnic Data Collection

How Does a Sponsor Receive the Monthly Reimbursement?

The USDA requires that sponsors keep daily records of meals served including food served, the number of participants served, attendance, and the number of participants enrolled by income eligibility determination. The organization submits a

claim each month to ODE CNP to support the request for reimbursement. ODE CNP reviews the claim and sends payment to each sponsor or sponsoring organizations.

Section C - Health and Safety Requirements

Child and Adult Care Food Program (CACFP) regulations require sponsors to notify appropriate licensing or health authorities of conduct or conditions that pose an imminent threat to the health or safety of participants or to the public. This section provides guidance to help sponsors detect and report the types of problems that rise to this higher level of concern.

It is important to remember that the facility's main priority is to protect the health and safety of those in care. CACFP sponsors (and monitors in multi-site organizations) must exercise judgment in making a determination of an imminent threat. ODE CNP encourages sponsors to establish written standards to help staff (and monitors in multi-site organizations) measure the severity of a health or safety threat and procedures to follow when a determination of imminent threat has been made.

Training for staff (and monitors in multi-site organizations) on this topic is recommended, as well. Two resources:

- [Caring for Our Children](#)
- [Stepping Stones to Caring for Our Children](#)

These are companion resources that provide additional guidance on managing, reporting, and documenting incidents of imminent threat. They recommend that child care facilities have written plans for reporting, managing, and training staff on what they determine to be incidents that threaten the health, safety, or welfare of children, staff, or volunteers. While these two resources address children specifically, the information provided can be referenced for participants in care in all centers participating in the CACFP.

Caring for Our Children and Stepping Stones to Caring for Our Children identify a number of circumstances that rise to the level of imminent threat, including:

- Lost or missing participant
- Suspected maltreatment of a participant
- Suspected sexual, physical, or emotional abuse of participants, staff, volunteers, visitors or family members occurring while they are on the premises of the care facility
- Injuries to participants requiring medical or dental care

- Illness or injuries requiring hospitalization or emergency treatment
- Mental health emergencies
- Health and safety emergencies involving parents or guardians and visitors to the care facility
- Death of a participant or staff member (including a death that occurred outside of center or home care hours that had resulted from serious illness or injury at the care facility)
- The presence of a threatening individual who attempts or succeeds in gaining entrance to the facility

If, for these or for any other reason, a staff member (or monitor in multi-site organizations) determines that a participant is in imminent danger, the staff member (or monitor in multi-site organizations) must call the proper authorities immediately and stay at the site until authorities have arrived.

Sponsor staff (and monitors in multi-site organizations) must understand that their response to imminent threats to the health and safety of participants in the CACFP should be applied consistently and fairly. The health and safety of those in care must be the overarching goal. Wherever there is a situation in CACFP involving a health or safety threat, ODE CNP expects sponsor staff (and monitors in multi-site organizations) to respond to the problem when they see it. This does not mean, however, that every licensing violation is an imminent threat to health and safety, or that State agencies may require CACFP sponsors to monitor for licensing agencies.

Required ODE CNP Action

During sponsor administrative reviews and site reviews, ODE CNP Child Nutrition Specialists must take immediate action and follow the requirements for suspension of an independent institution's participation, for reasons of health or safety [7 CFR 226.6(c)(5)(i)]. See [Chapter 25 Serious Deficiencies, Suspensions, and Terminations](#) for further information on Program suspension.

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Section A – New Applicants: Getting Started in the CACFP

The CACFP is a voluntary, federally funded program. By agreeing to participate, sponsors accept final administrative and financial responsibility for the operation of the program according to Federal and state laws, regulations, and policies.

To participate in the CACFP, an applicant must complete a 6-step application process and be approved by ODE CNP before they are considered a sponsor. Applicants may be denied at any portion of the process if ODE CNP finds that the organization does not have the financial viability, organizational capability, or internal controls for accountability to successfully operate the CACFP. The process will include an ODE CNP review of forms and documentation submitted by the organization to determine if the sponsor is capable of operating the CACFP. Once approved, the new sponsor will sign a *State Agency-Sponsor Agreement* and submit all additional required information. This section provides an overview of the necessary steps for sponsoring organizations to complete the initial application.

Responsible Principals

Before starting on the application process, applicants must assign staff from their organization to take on important duties for CACFP. There are four named roles that must be assigned, and they are:

- **Authorized Representatives:** Director, owner, or superintendent-level manager who has the authority to sign a contract with ODE CNP and has ultimate oversight of how CACFP is run.
- **Food Program Coordinators:** The sponsor staff who is responsible for day-to-day oversight of CACFP operations and will be the main point of contact with ODE CNP.
- **Financial Office Contacts:** Business manager or CFO-level manager who is responsible for oversight of financial management of the CACFP fund account.
- **Claim Contacts:** The staff who is responsible for compiling, verifying, and submitting claims to ODE CNP monthly.

Together, they make up four of the **responsible principals**. There is a potential fifth responsible principal for non-profit organizations and school districts, which is the **Board Chair**.

Responsible principals are named in the CACFP application and are responsible for the management and oversight of CACFP operations. ODE CNP checks each application to ensure that responsible principals have not been disqualified from running Child Nutrition Programs.

It is best practice to have multiple staff take on different responsible principal roles.

The Application Process

Potential applicants must successfully complete the following steps* in the application process to become a sponsor in the CACFP:

Step 1: Eligibility Assessment

Step 2: Training and Procedures

Step 3: Online and Offline Forms and Financial Viability Assessment

Step 4: Application Evaluation

Step 5: Pre-Approval Review

Step 6: Final Application Review

Step 7: Application Approval

**If the potential applicant currently operates another Child Nutrition (i.e., National School Lunch Program (NSLP) or Summer Food Service Program (SFSP)) and are in good standing for that program, the applicant process may be streamlined per ODE CNP discretion.*

Step 1: Eligibility Assessment

Potential applicants are required to complete an Eligibility Assessment, found on the [Becoming a CACFP Sponsor webpage](#). After a potential applicant has completed the Eligibility Assessment, a Program Analyst will review the assessment and determine if an applicant is eligible to be a CACFP sponsor. If eligible, a Program Analyst will contact the applicant to gather additional information and basic financial documentation. If the initial screening of this information and documentation determines that the potential applicant may be qualified for participation, the potential applicant will be contacted by a Program Analyst to begin the application process.

As part of the eligibility assessment sponsors are required to submit a **Unique Entity ID** (UEI) number. All organizations requesting federal funds are required to have a current UEI number on file. If the organization does not already have a UEI number, one must be requested through www.sam.gov. Sponsors must review the requirements for "signing up" vs. "registering" for a UEI before starting to ensure the correct steps are taken. More information may be found in the [Getting a Unique Entity ID video](#).

Step 2: Training and Procedures

The Program Analyst will provide the applicant instructions for taking the online, webinar-based ODE CNP New Applicant Trainings and completing the necessary written policies and procedures. The training covers basic CACFP requirements, which the applicant must be prepared to implement in order to operate the CACFP in compliance with Federal regulations. Paired with the trainings are procedures that also must be completed. These procedures are to help build the foundation on which the applicant's organization will implement the CACFP. Assigned trainings and required procedures are based on the type of program the applicant plans to operate.

It is important that all organization officials who will have the ultimate authority to administer the CACFP take the New Applicant Trainings. (Example: Sponsor's CACFP director and/or chief officer). All For-Profit owners must take the New Applicant Trainings. Trainings will be required for responsible principals who will take on the roles of Food Program Coordinator and Authorized Representative. Other program staff members who have CACFP responsibilities may take the ODE CNP training, although this is not required.

The applicant is assigned a Child Nutrition Specialist at this step. The assigned Specialist will reach out to the applicant to provide support in the application process.

Step 3: Online and Offline Forms and Financial Viability Assessment

After the training certifications are submitted and the Program Analyst approves it, the potential applicant will be sent forms for [CNPweb](#). CNPweb is the online system that sponsors use to communicate program information with ODE CNP. ODE CNP uses CNPweb to review information submitted by sponsors for accuracy and to track approval for items such as eligible sites, meals to be served, and meal claims. Potential applicants must accurately complete and submit the forms listed below:

- *CNPweb User Authorization Request & Certification Form(s)*
- *CNPweb Add Site/Modify Site Form(s)*
- *CNPweb New Sponsor Information Form*

Once the CNPweb forms are completed, the assigned Child Nutrition Specialist will provide the applicant with the full online and off-line application instructions and location of required documents. Potential applicants are required to submit further financial viability documentation to ODE CNP during this step.

To demonstrate financial viability, applicants are required to submit the following documents for review by the Finance and Audit Child Nutrition Specialist. If the

applicant is the sponsor of another Child Nutrition Program, they may not be required to complete all of the following step:

For-Profit:

- Excel Annual CACFP Budget Form
- Balance Sheet
- Income Statement

Bank statement for three selected previous months

Non-Profit:

- Excel Annual CACFP Budget Form
- IRS proof of Non-Profit Status
- IRS Form 990 or Income Statement
- Bank statement for three selected previous months
- Board minutes for three selected previous months

Financial viability documentation is not required for school districts operating the National School Lunch Program (NSLP).

The assigned Child Nutrition Specialist will work with the applicant to complete all required online and off-line application materials. The following offline forms must be completed and submitted to ODE CNP. The forms below are located on the [CNPweb website](#) packet page:

- Excel Budget for Center Sponsors
- Outside Employment Policy
- W-9 Form
- Racial and Ethnic Data Collection Form (also on the [Civil Rights page](#))

The following online forms must be submitted through CNPweb.

- *Sponsor Information Sheet*
- *Sponsor Budget (not required for School Districts on NSLP)*
- *Sponsor Management Plan*
- *Site Information Sheet(s)*

Additionally, applicants are directed to the following forms to get them started on record keeping:

- [CACFP One Month Enrollment Roster \(OMER\)](#)
- [Meal Count forms](#)
- [Medical Statement to Request Special Meals and/or Accommodations](#)

- [Meal Preference Request Form](#)
- [Infant Menu Records](#)
- [Racial Ethnic Data Collection Form](#)
- Other forms as required

Additional information required for application:

- [Women, Infants and Children \(WIC\)](#):
 - WIC is the Special Supplemental Nutrition Program for Women, Infants and Children. This public health program is designed to improve health outcomes and influence lifetime nutrition and health behaviors in a targeted, at-risk population. Nutrition education is the cornerstone of the WIC Program. The Oregon WIC Program is part of [The Center for Prevention and Health Promotion](#). Sponsors are required to make the following WIC information available to the parents/guardians of all enrolled children:
 - Importance and benefits of WIC
 - WIC income eligibility guidelines
 - Sponsors may meet the above requirement by distributing the Oregon WIC brochure *WIC: Healthy kids, healthy foods, healthy families*. The brochures are available in various languages and can be accessed on the [Oregon WIC Outreach website](#)
 - Information on WIC and WIC income eligibility guidelines is available on the [Oregon WIC website](#)
 - At-Risk Afterschool and Adult Day Care programs are exempt to providing WIC information
- Building for the Future Flyer:
 - All sponsors, except Adult Day Care Centers, are required to post the "[Building for the Future](#)" flyer in a prominent location at all approved CACFP site locations, including administrative offices. Sponsors must update the flyer to include a point of contact. This flyer, which is in English and Spanish, must be posted where participants and potential participants have ready access. The purpose of the flyer is to notify parents, guardians, and participants of the sponsor's participation in the USDA CACFP, the program benefits, and who to contact with concerns. Posting this flyer is a requirement under the Federal CACFP regulations. ODE CNP staff will check to see if the flyer is posted in a prominent location while conducting CACFP administrative reviews.
- Federal IRS non-profit status letter for 501(c)(3) status: If the organization is a religious organization, it must have the IRS non-profit status letter and a letter from a sponsoring religious organization stating that the child or adult care

program is a part of the mission of the local church.

- For-Profit sponsors must submit an eligibility certification (See [Chapter 19 For-Profit Programs](#))
- Minority and grassroots contacts
- Vended Meal Agreement: If meals are contracted from a food service management company, school district, or other vendor (See [Chapter 8 Procurement](#))
- Child Care Licensing Division CCLD) licenses for each site or, if exempt from CCLD licensing, documentation exemption and documentation of current satisfactory inspections from local health and fire departments.

Completing the Management Plan and Budget

An important part of the application is the *Management Plan* and Budget for CACFP. The *Management Plan* is required by federal regulations and assists ODE CNP to determine if the sponsor is financially viable, accountable, and capable. The ODE CNP *Management Plan* requires detailed information about a sponsor's administrative structure including the following:

- Sponsor Information
- Financial Viability and Financial Management
- Administrative Capability including:
 - Positions/titles of staff assigned to CACFP functions
- Program Accountability including:
 - List of Board of Directors (required for private non-profit organizations)
 - Certification that officers, Responsible Principals/Individuals, or owners (as applicable) do or do not have a business-related criminal record
- Organization's CACFP procedures and forms
- CACFP administrative budget

Note: Emergency shelters are not required to complete a *Management Plan* unless they are a multi-site sponsor. Latitude may be provided with budgets. (see [CACFP Memo 11-2007](#))

Step 4: Application Evaluation by ODE CNP

The assigned Child Nutrition Specialist and team Manager will review the application for completeness and for compliance with regulations and policies. Further

information or clarification may be requested. If the application meets regulatory requirements and is approved by ODE CNP, a pre-approval visit will be scheduled. If an application is not completed in a timely manner or does not demonstrate the applicant's viability, capability, and accountability to operate the CACFP, the application will be denied.

Step 5: Pre-Approval Review

Once accurate and complete application materials are received, a specialist from ODE CNP will make an appointment to review the sponsor's operation prior to final approval. This is called a Pre-Approval Review.

Applicants must implement all meal and record keeping requirements prior to the pre-approval review or approval of the application will be delayed or denied. The pre-approval review will include:

- Determination that facilities are viable for the type and number of meals for which the applicant requested approval
- Meal observation to ensure that food components, serving sizes, and meal service meet CACFP requirements
- Check of CACFP records and systems
- Compliance assessment of Civil Rights requirements
- Check for implementation of Management Plan as submitted
- Technical assistance (TA), as needed, to improve program quality

Step 6: ODE CNP Final Application Review

After the Pre-Approval visit, the assigned Child Nutrition Specialist and the team Manager will complete a final review of all Program requirements. If needed, corrections will be requested at this stage.

Once an applicant is recommended for approval, a permanent agreement will be issued by ODE's Procurement department.

Step 7: Application Approval

ODE CNP staff will complete the application approval process and an approval letter will be sent out to the listed responsible principals in CNPweb. The assigned Child Nutrition Specialist can provide technical assistance of submitting monthly claims through CNPweb.

Post approval, a survey will be sent out and the Technical Assistance team will reach out for a technical assistance visit after the sponsor has been operating for at least a few weeks.

Application Denials:

Applications may be denied at any step in the process.

Denial of participation in the CACFP is an appealable action. If ODE CNP determines that an application is denied, the applicant will be provided with the [Child and Adult Care Food Program Appeal Procedure 7 CFR 226.6\(k\)](#)

New Applicants with Five or More Sponsored Sites at Application

New institutions that are sponsoring organizations of five (5) or more sites at the time of application must have a full administrative review within ninety (90) days of the date they were approved to begin operation of the CACFP. See [Chapter 24 Administrative Reviews and Investigations](#) for information on the Administrative Review process.

Section B – Renewals

Renewals

ODE CNP sends an application renewal memo and instructions to each sponsor prior to the beginning of each fiscal year. CNPweb “rolls over” to the next fiscal year on the renewal start date listed in the memo. The CACFP operates on the Federal fiscal year that begins on October 1 and ends September 30 of the following year. Failure to submit a complete and correct renewal application by the deadline may result in delay or disruption of reimbursement, or ultimately in termination of the *State Agency-Sponsor Agreement*. The deadline for submitting renewal applications is published annually.

Renewing sponsors must submit sufficient information to document that it meets the Performance Standards ([7 CFR 226.6\(b\)\(1\)\(xviii\)](#)). These standards are in place to ensure sponsors are qualified and capable of running the Program. USDA prohibits State agencies from approving renewing applications unless all performance standards are met. All requirements for renewals are included with the renewal letter annually.

Sponsors are required to submit complete and accurate information by the assigned deadlines and provide timely responses to ODE CNP inquiries and requests for clarifying and/or additional information. Sponsors will work closely with their assigned Specialist and the Finance and Audit Specialist during the application

renewal process.

See the [ODE CACFP Memos, News, and Regulations website](#) for the most current renewal memos and instructions.

Section C – Sponsor Name Change

Sponsors that change their business entity name are required to complete and submit:

- Sponsor Name Change form
- Newly signed *State Agency–Sponsor Agreement* (see Packet page of the Sponsor Summary in CNPweb)

Non-Profit Sponsors

Non-profit sponsors must also submit a revised IRS 501 (c)(3) status letter from the Internal Revenue Service showing the new business entity name. If the business entity address has changed in addition to the name change, the IRS 501(c) letter must also show the correct, current address.

For-Profit Sponsors

For-Profit sponsors who will also have an ownership change in addition to the business entity name change must contact their assigned specialist for additional requirements. Also see [Chapter 19 For-Profit Programs, Section D Change in Ownership](#).

Section D – Safety and Sanitation Approval for Sites

All sites participating in the CACFP can qualify by one of the following methods:

- Maintaining a current Child Care Licensing Division (CCLD) Certificate or be CCLD exempt; *or*
- Obtaining/maintaining current Approval from another Federal, State, or local government entity; *or*
- Completing CACFP Alternate Approval requirements

Please refer to the descriptions below to determine the appropriate method by which to qualify sites.

Oregon Child Care Licensing Division (CCLD) Certification

All sites that are required by law to be CCLD-licensed must have a current CCLD certificate to receive CACFP reimbursement. For Child Care Licensing Division requirements, please contact the Child Care Licensing Division at 1-800-556-6616.

Programs that believe they are CCLD-license exempt must contact CCLD to verify their exempt status. If the program is determined to be CCLD-license exempt, they must obtain written confirmation from CCLD of the exempt status.

For more information about CCLD visit the [CCLD webpage](#).

Other Federal, State or Local Approval

Some sites, while exempt from CCLD licensing and recording, have government oversight. Some of these sites may qualify for CACFP if the site is exempt from Child Care Licensing Division licensing and recording, and is approved by one of the following entities:

- Federal Head Start approval
- Oregon Department of Education (ODE) Pre-Kindergarten approval
- Federal or State-approved Even Start programs
- School district operated childcare or afterschool programs

Sites that are approved using other Federal, State, or Local approval must have documentation available to show that buildings meet health safety and fire safety standards per the Sanitation Inspections and Fire Inspections sections in this chapter.

Note: If a school district sponsors a non-school district operated site, such as a Boys and Girls Club, that site must meet the CACFP Alternate Approval requirements or qualify by one of the other methods on following list:

- ODE-approved 21st Century School programs during the funding period.
- Oregon Department of Human Services license for a Child-Caring Agency that provides non-residential day treatment for children *
- Tribal approval – Some Oregon tribes have an approval process that may meet the Federal requirements. For more information on approval of tribal sites please contact your assigned Specialist.
- ODE-approved special education preschools

*A copy of the approval or certificate for these sites must be submitted with new site applications and annually with CACFP renewal materials.

Alternate Approval

The CCLD license-exempt sites and sites qualifying under “Other Federal, State and Local Approval” must meet at least one of the following exclusion criteria:

- Are primarily supervised, child-focused training in a specific subject, including, but not limited to, dancing, drama, music, or religion. This exclusion applies only to the time children are involved in training.
- Are primarily incidents of group athletic or social activities sponsored by or under the supervision of an organized club or hobby group. This exclusion applies only to the time engaged in the group athletic or social activities and if the children can come and go as they please.
- Are operated by a school district, political subdivision of this state, or a government agency, *or*
- Provide care while the child’s parent remains on the premises and is engaged in an activity offered by the facility or in other non-work activity.

ODE CNP’s alternate approval process requires documentation of a satisfactory sanitation inspection and a current satisfactory fire/safety inspection at each feeding or serving site. The dates of each inspection type will be recorded in the individual site information sheets in CNPweb and updated upon the completion of each new inspection.

Sanitation inspections must be conducted annually. Fire inspections must be conducted every two years. Sponsors are responsible for requesting and paying for all inspections and re-inspections if re-inspection is necessary. Sponsors can use the [Sanitation Inspection Request form](#) to request the annual sanitation inspection for all sites.

Sanitation Inspections

Food service safety and sanitation is a critical element of the CACFP. Children under five years old are especially susceptible to food-borne illnesses because their immune systems are not fully developed. The CACFP also serves disabled and frail elderly adults who are more vulnerable to food borne illness than their peers.

The local (county) Environmental Health Department or the Oregon Department of Human Services, Environmental Health Field Services Unit will conduct the sanitation inspections. An optional [Facility Food Service Sanitation Evaluations Report](#) for use in facilities exempt from Child Care Licensing Division licensing is available at the link

provided. At a minimum, the sanitation inspection will determine if a site is in compliance with State Food Code law in the following areas:

- Foods obtained from approved sources
- Potentially hazardous foods stored/prepared/held/served at proper temperatures
- Leftovers properly cooled
- Dishwashing facilities adequate for washing, rinsing, and sanitizing
- Hand washing sinks available in the food service area and supplied with hand soap and paper hand towels
- Personal hygiene practices of food service staff
- Other sanitation issues including a safe water source, vector controls, chemical storage, refuse disposal, and sewage disposal
- Kitchen/food prep area sanitary

Sites that have one or more critical violations will be scheduled for a re-inspection visit by the health department that conducted the original sanitation inspection. Sponsors are responsible for working with their sanitarian/inspector to correct critical violations. Sites currently participating in the CACFP must correct violations and have a current, satisfactory food safety and sanitation inspection to be approved as CACFP feeding or serving sites.

Sponsors requesting to add new sites or new sponsors seeking approval to operate the CACFP at new sites with uncorrected critical violations after re-inspection will be denied approval to participate for those sites.

Fire Inspections

Sponsors must provide documentation of a current satisfactory fire/safety inspection at all feeding and serving sites. Fire and building safety inspections must be current (within the past 24 months from date of submission) and must be satisfactory (have no uncorrected violations). The local Fire Department conducts fire/safety inspections. Sponsors are responsible for working with the fire inspector to correct any fire/safety violations.

Section E – Program Closure

Sponsors may choose to close their State Agency-Sponsor Agreement at any time, except when ODE CNP has an open Administrative Review or complaint regarding

the sponsor. Sponsors must provide the closure notice in writing via email. The notice should include the reason for the closure, last date of operation and last claim date.

The reasons for closing an agreement are varied and ODE CNP will work with a sponsor to assist them in this process. Please contact your assigned Child Nutrition Specialist as early in the decision process as possible. This will allow sufficient time to provide you with any technical assistance that may be necessary to allow the process to move forward in a timely manner.

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Sponsors are required to determine participants' Free, Reduced-Price or Above Scale eligibility annually. This is based on Federal guidelines.

This chapter applies to child care centers, Outside School Hours Care Centers (OSHCC), adult day care centers, and Head Start sponsors (Oregon Head Start, Early Start, and OHS Pre-K) that are claiming sibling and/or community slot meals. See [Chapter 18 Head Start](#) for further instructions.

This chapter does not apply to At-Risk Afterschool Program sites or to Emergency Shelter programs.

Section A – CACFP Child Enrollment Form

This section does not apply to, At-Risk Afterschool Programs, and Emergency Shelters.

A completed CACFP Child Enrollment Form is required for every child in care that meals are reimbursed for, including Head Start programs, infants, and drop-in children. Meals may not be claimed for CACFP reimbursement without a complete and current CACFP Child Enrollment Form on file. Sponsors are required to use the ODE-developed CACFP Child Enrollment Form available on the [ODE CNP CACFP Page](#).

CACFP Child Enrollment Forms must be completed annually. They are effective from the first day of the month in which the form was signed by the parent or legal guardian through the last day of that same calendar month twelve months later. All enrollment documentation on file must be valid and complete.

For a CACFP Child Enrollment Form to be considered valid, the sponsor/site name, the participant(s) full name, the infant formula section (if applicable), the parent guardian signature, name and date must all be completed. If a participant listed on the form is an infant, the sponsor must write in the type of formula the childcare center offers prior to providing the form to parents or guardians.

In addition to being valid, the CACFP Child Enrollment forms must also be completed. To be considered complete, all the following sections must be filled out:

- Sponsor or site name
- Child's first and last name
- Days normally in care
- Hours normally in care
- Meals normally received while in care
- Parent or guardian signature
- Date of parent or guardian signature
- If a participant on the form is an infant:

- The sponsor must list the type of creditable formula provided by the childcare center
- The parent or guardian must designate on the form if the formula is accepted or declined.

Routine child schedule changes during the year do not require an updated CACFP Child Enrollment Form.

Digital/Electronic Signatures:

Parent and guardian signatures for Child Enrollment Forms (CEFs) can be collected digitally. Sponsors who use digital or e-signatures must be able to verify that the signatures are legitimate. Many online applications and platforms allow documents to be signed and provide a digital verification stamp.

If parents or guardians are unable to provide a digital signature, a verification statement sent via email from a known email address from the parent or guardian can be accepted in lieu of the digital signature.

If sponsors modify the CEFs for any reason, including for formatting purposes to upload electronically, the modified CEFs must be approved by ODE CNP prior to use.

Adult Care Centers:

Adult Care Centers are not required to *annually* update enrollment forms for adults receiving care. However, are required to maintain the original enrollment form that contains all the required elements. Refer to Chapter 21: Adult Day Care Centers for additional documentation requirements.

Outside School Hours Care Centers (OSHCC):

OSHCC's are not required to use the ODE CNP CACFP Child Enrollment Form, however, are required to maintain enrollment documentation for each child enrolled in care. Refer to [Chapter 20 Outside School Hours Care Centers](#) for additional documentation requirements.

Section B – Determining the Eligibility Category: Free, Reduced-Price, or Above Scale

Eligibility categories determine reimbursement rates for meals. The sponsor's unique reimbursement rate is determined by the number of participants in each eligibility category. Sponsors receive:

- The highest reimbursement for meals served to participants approved in the Free category;
- Slightly less reimbursement for meals served to participants approved in the Reduced-Price category; and
- The lowest reimbursement for meals served to participants approved in the Above-Scale category.

Each July 1 the Federal government sets the income guidelines for determining the following eligibility categories: Free, Reduced-Price, and Above-Scale. The guidelines are based on household income and household size. Low-income households meeting Federal guidelines are categorized as eligible for "Free." Households with slightly higher income are categorized as eligible for "Reduced-Price." Households with incomes above the Reduced-Price guidelines are categorized as eligible for "Above-Scale." The household eligibility category is determined by having the household complete a Confidential Income Statement (CIS).

Sponsors will determine which eligibility category participants are by using one of the following types of eligibility documentation Each type of documentation is described in more detail below:

- Household income
- Categorical eligibility: Temporary Assistance for Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian reservations (FDPIR)
- Automatic eligibility: Foster, Homeless, Head Start, Even Start, Migrant, OHS Pre-K
- Other shared CNP sponsor eligibility documentation
- School district eligibility documentation
- Supplemental Security Income (SSI)—Adults, only
- Medicaid/Oregon Health Plan—Adults, only

Confidential Income Statements

The sponsor must distribute [Confidential Income Statements](#) (CIS) and the [Letter to Households](#) to all participants at the time of enrollment and annually, thereafter.

Adult day care program sponsors see [Chapter 21 Adult Day Care](#) for exceptions to this requirement.

The sponsor collects CIS that are voluntarily returned by parents/guardians or participants. The CIS that have been collected are reviewed by sponsors and an eligibility determination is made based on the information provided for current the participant(s) listed on the CIS.

The following are ways that a participants eligibility category may be determined when a CIS is completed for the household:

- Household income
- Categorical eligibility: TANF, SNAP, FDPIR
- Automatic Eligibility: Foster

Letter to Household

Sponsors are required to annually send the Letter to Households to parents and guardians of enrolled participants along with the CIS form. This letter is to inform parents and guardians of the procedures regarding eligibility for free and reduced-price meals. [7 CFR 226.23\(e\)\(2\)](#). Refer to the [Distributing and Completing Confidential Income Statements](#) section for more information.

How Long is the CIS Valid?

The CIS must be updated annually, and eligibility is valid for only 12 months. The CIS is considered current and valid until the last day of the month in which the form was dated and signed by the sponsor's approving official one year earlier (e.g., a CIS signed and dated by a sponsor on January 12, 2024, is considered valid until January 31, 2025).

Most sponsors find it easiest to collect new CIS forms from households in July or August when ODE CNP issues the new Federal income guidelines, the CIS forms, and the Letter to Households for the new fiscal year.

Sponsors distribute and collect CIS forms and the Letter to Households through October 31 to ensure all CIS forms voluntarily returned by parents/guardians or participants are approved, signed, and dated by the Sponsor's Eligibility Official by October 31.

Sponsors have flexibility concerning the effective date of certification for CIS. The eligibility date may be either the date the parent or guardian signed the income eligibility form or the date on which the sponsor signs the form to certify eligibility of the participant. However, if the date of parent signature is not within the month of certification or the immediately preceding month, the effective date must be the date of certification. This flexibility applies only to complete applications containing all required information at the time of submission.

Sponsors must decide which date they will rely on as the effective date and apply this date to all income eligibility forms submitted on behalf of all participants enrolled in the center.

CIS Submitted with "Zero" Income

When a household submits a CIS with "zero" income entered in Section 4 by entering "0" and does not provide a current Supplemental Nutrition Assistance Program (SNAP),

TANF (Temporary Assistance for Needy Families) case number or provides information indicating that the household receives FDPIR benefits, sponsors may approve the CIS in the Free category. Section 6 of the CIS form must have all appropriate household members listed in column 1 and the “zero” income must be documented in one of the following ways to be considered complete for approval:

- Check the box in column 6 that states “check if no income” for each listed household member,
- Columns 2-5 have “0” written in for each household member, or
- Columns 2-6 are left blank for each household member

Other Allowable Eligibility Documentation

The following participants may be classified in the Free category without a CIS form on file:

- Participants who are enrolled Head Start or Oregon Head Start Pre-K (OHS Pre-K) for the current school year. Required documentation: Written statement/letter from the Head Start or OHS Pre-K certifying the child’s enrollment in Head Start/OHS Pre-K that includes participant's full name, name, signature of Head Start/OHS Pre-K qualifying official and date of signature.
- Participants living in households where a school-age member receives free meals at school either through direct certification or income application. Documentation Required: Written statement/letter from the school district certifying the student’s free-meal qualification that includes participant's full name.
- Migrant children are automatically free with documentation of their migrant status from a school district or other government agency.
- Participants who are homeless or at risk of homelessness as determined by a school district’s homeless coordinator or other community homeless liaison. Required documentation: A list of all participants determined homeless that includes the participant’s full name.
- Foster children with documentation from an appropriate State or local agency indicating the status of the child as a foster child whose care and placement is the responsibility of the State or that the foster child has been placed with a caretaker household by a court. See the foster child section in this chapter for more information.

School District Eligibility Documentation: A school district may provide a letter or other written statement providing the eligibility determination made by the school

district for enrolled students. This documentation may be used by CACFP sponsors in place of collecting CIS from the families listed in the school district documentation.

Community Eligibility Provision (CEP): Sponsors that operate childcare sites located in schools on CEP must distribute, collect, and approve CIS forms for enrolled participants on CACFP.

Direct Certification Eligibility Notification Letters: School districts send letters of eligibility for free meals to families who qualify based on a process called Direct Certification. If a parent or guardian presents a sponsor with a Direct Certification letter, the sponsor may make a copy and retain it on file in place of having the parent/guardian complete a CIS form.

If a sponsor has questions regarding any other eligibility documentation submitted by a parent or guardian, please contact your assigned Child Nutrition Specialist.

Note: If a household is receiving Employment Related Day Care (ERDC), a CIS form is required because the household does not automatically qualify as Free-eligible.

Adult Participants: See [Chapter 21 Adult Day Care](#) for other allowable eligibility documentation.

The sponsor must keep all completed CIS forms and other Free or Reduced-Price eligible documentation on file. These documents will be used to develop the One Month Enrollment Roster (OMER). See [Chapter 4 The One Month Enrollment Roster](#) for more information on OMER. All other allowable eligibility documentation is valid for 12 months.

Eligibility for Free Meals in a Disaster

Children Experiencing Homelessness in a Disaster: Children residing in, or evacuated from, disaster areas may be determined homeless under the McKinney-Vento Homeless Assistance Act. These children are automatically eligible for free meals in the Child Nutrition Programs. A school district's homeless coordinator or other community homeless liaison makes a determination of homelessness and provides a list of all children determined homeless due to a disaster situation. The sponsor must certify these children for free meals.

In cases where a household from a designated disaster area moves in with another household, the community homeless liaison may determine the displaced individuals homeless under the McKinney-Vento Homeless Assistance Act. Displaced children and adult participants in CACFP are automatically eligible for free meals in centers even if they are temporarily residing with another family. The host family may include

the displaced family members and any income provided to them when applying for Free or Reduced-Price eligibility.

Sponsors that require eligibility information can receive certification of the participant's homeless status from the agency that assisted with the evacuation or that is providing shelter. If the child is not residing in an emergency shelter, the sponsor should have an adult living with the child complete an income eligibility form indicating that the child is homeless. No further information is required to certify the child's eligibility.

Disaster Benefits from the Supplemental Nutrition Assistance Program: Children in households receiving Disaster Supplemental Nutrition Assistance Program (D-SNAP) benefits are categorically eligible for free meals in the Child Nutrition Programs. Certification of these children may be accomplished through direct contact with the SNAP agency or by an application submitted by a household with a case number.

Duration of Eligibility: Children certified for free or reduced-price meal benefits because of a disaster situation remain eligible for free meal benefits for 12 months.

Confidentiality

All information on the CIS is confidential. Sponsors must have systems to ensure that no one is allowed access to these documents other than authorized sponsor representatives, ODE CACFP authorized staff, and USDA staff.

Child Nutrition Program (CNP) sponsors may share eligibility determination information with other CNP sponsors. ODE CNP recommends that sponsors develop a policy regarding when they will share eligibility information with other CNP sponsors. Sponsors should have a written procedure regarding the process for the transfer of the information to another CNP sponsor to ensure confidentiality of the shared information.

Information contained on the CIS may not be disclosed to any person or program that is not a CNP sponsor without signed authorization from the adult household member. Prior to disclosing any information, contact your Child Nutrition Specialist.

For-Profit Centers Using Free/Reduced-Price Eligibility

For-Profit centers are required to validate each month that they qualify to claim meal reimbursement at each approved site that meets the 25% Eligibility criterion. See [Chapter 19 For-Profit Programs](#) for more information on the 25% Eligibility criterion.

Pricing Programs

Pricing programs must collect CIS forms from participants throughout the year. See [Chapter 22 Pricing Programs](#) for more information on eligibility determination requirements for pricing programs.

Head Start Programs Claiming Siblings and/or Community Slots

Head Start Programs that plan to claim sibling and/or community slot meals must create a One Month Enrollment Roster (OMER) for each ODE CNP approved site that will be claiming such meals. To create an OMER for these sites an eligibility determination must be made for each sibling and/or community slot participant.

Siblings: Siblings of Head Start-enrolled children are not automatically eligible for free meals. If a Head Start Program will be claiming meals for siblings of Head Start enrollees, then Head Start programs must distribute CIS and Letters to Households to each family with siblings whose meals will be claimed for reimbursement. Head Start Programs will then collect all CIS voluntarily submitted by parents/guardians. The CIS that have been returned are reviewed by sponsors and an eligibility determination is made based on the information provided for the sibling participant(s) listed on the CIS during the month of October. Any sibling participants who do not have a sponsor-approved CIS on file will be considered to have an eligibility determination of Above Scale.

Community Slots: Some Head Start sponsors claim meals for participants whose slot is paid for by a funding source other than Head Start or Oregon Pre-K. If this is the case, the participant is not automatically eligible for free meals. Sponsors must distribute CIS and Letters to Households to these families. Preschool Promise is an example of a funding source that may fund a community slot at a Head Start sponsor. Since this is funding outside of Head Start or Oregon Pre-K and Preschool Promise does not have categorical eligibility, the participant would be required to provide other eligibility documentation to be qualified for Free or Reduced-Price on the OMER.

Head Start Programs will then collect all CIS voluntarily submitted by parents/guardians of community slot participants. The CIS that have been returned are reviewed by sponsors and an eligibility determination is made based on the information provided for the community slot participant(s) listed on the CIS during the month of October. Any community slot participants who do not have a sponsor-approved CIS on file will be considered to have an eligibility determination of Above Scale.

Section C – Distributing and Completing Confidential Income Statements

Sponsors may choose not to distribute or collect Confidential Income Statements (CIS) forms from participants and claim all meals in the Above-Scale category. Sponsors that claim one or more participant in the Free or Reduced-Price categories must follow the steps:

Distributing the CIS and Letter to Households

ODE CNP updates [the CIS](#) and [Letter to Households](#) annually after receiving the new form requirements from USDA. The update occurs every July 1. The updated form and letter are posted on the ODE CNP website and sponsors are notified of the update.

Sponsors must distribute current CIS forms and the Letter to Households to all enrolled participants at enrollment and annually, thereafter, unless exempt as noted at the beginning of this chapter. ODE CNP does not have a specific requirement for the date of the annual renewal of eligibility for all enrolled participants. Sponsors may determine the schedule for distribution of new CIS and Letters to Households that best suits their operation.

Distribution of the new forms sometime during the period of July-September each year may help ensure that a sponsor has the maximum number of CIS returned by parents/guardians or participants to allow sponsor eligibility determination and approval by October 31. CIS must be approved, signed and dated by the sponsor eligibility official no later than October 31 of each year to be valid for the October One Month Enrollment Roster (OMER).

Parents/ guardians or adult participants should complete and return the CIS form to the sponsor. If the CIS form is not completed and returned by the household, the sponsor must categorize the participant Above-Scale.

Note: The Letter to Households provided to each parent/guardian or participant does not need to be collected, they are only for informational purposes to the households informing them of program benefits.

As new participants enroll, sponsors must include the CIS form and the Letter to Households as part of the enrollment material. When sponsors approve a new CIS, the expired form should be filed in an “Inactive CIS” folder or other filing location. All expired forms must be retained for three years plus the current fiscal year.

Completing CIS Forms and Determining Eligibility

Only completed and sponsor-approved CIS are valid. Completion of Section 6, Racial or Ethnic Group is optional, and households are not required to complete this portion. A complete CIS includes all the following information for each of the three eligibility types:

Digital/Electronic Signatures:

Parent and guardian signatures for CIS can be collected digitally. Sponsors who use digital or e-signatures must be able to verify that the signatures are legitimate. Many online applications and platforms allow documents to be signed and provide a digital verification stamp.

If parents or guardians are unable to provide a digital signature, a verification statement sent via email from a known email address from the parent or guardian can be accepted in lieu of the digital signature.

Categorical Eligibility

CIS that are approved based on the household providing a case number for SNAP, or TANF, or an indication the household receives Food Distribution Program on Indian Reservations (FDPIR) benefits must have the following sections complete:

- Section 1 - Household Information
- Section 2 - Information of Participant(s) enrolled in care
- Section 3 - Type of benefits received (SNAP or TANF) with current case number or an indication that the household receives FDPIR benefits
- Section 5 - Name and signature of adult household member or signature of adult participant, the date signed by adult household member or adult participant. Note: the last 4 digits of the SSN are not required for households providing SNAP, TANF or FDPIR information –
- Sponsor Use Only Section:
 - Eligibility reason used to approve the CIS
 - Approved eligibility category -
- Signature and date of Sponsor Official determining eligibility

Income Eligibility

CIS that are approved based on household income and current [Federal Income Guidelines](#) must have the following sections complete:

- Section 1 - Household Information
- Section 2 - Information of Participant(s) enrolled in care
- Section 4 -
 - Names of all household members: The household may choose to consider any foster children placed in their care as part of the

household, or not. If the foster child(ren) is not included as part of the household, the parent/guardian must provide appropriate documentation verifying the status of the foster child(ren) or complete a separate CIS for the foster child(ren). See Foster Children below).

- Household income listed individually by household member and source (Monies provided to the household for the care of a foster child(ren) are not listed as part of household income). Refer to the [Zero Income](#) section for applications with zero income.
- Section 5:
 - Name and signature of adult household member or adult participant
 - Date signed by adult household member or adult participant
 - Last four digits of the Social Security Number (SSN) of adult household member or adult participant signing the CIS
- Sponsor Use Only:
 - Eligibility reason used to approve the CIS
 - Approved eligibility category
 - Signature and date of Sponsor Official determining eligibility

Households receiving Family Subsistence Supplemental Allowance (FSSA), combat pay, or Assignment Incentive Pay (AIP) from the Department of Defense should not include the FSSA, combat pay, or AIP in household income.

Foster Children

Foster children are categorically eligible for free meals. Sponsors are required to have one of the two following types of documentation on file as supporting documentation:

1. A complete and current CIS form which documents the participant as Foster, *or*
2. Obtain documentation from an appropriate State or local foster care agency or court indicating the status of the child as a foster child whose care and placement is the responsibility of the State or that the foster child has been placed with a caretaker household by a court.

Note: Children formally placed in kinship care by a child welfare agency or a court are eligible. Children informally placed in kinship care or with families who assume guardianship responsibilities that exist outside of State or court-based systems are not included.

Foster children may be considered part of the household and included on a CIS submitted by the household in which they have been placed by a state or local foster care agency or a court at the household's discretion.

If the household completes a separate CIS for a foster child, the form must include:

- Section 1: Household Information

- Section 2: Information of Participant(s) enrolled in care
- Section 4: If the participant receives monthly personal use discretionary income, include in this section
- Section 5: Signature and date signed by foster parent or caseworker
- Sponsor Use Only: Signature and date of Sponsoring Official determining eligibility

Households with more than one foster child may include all foster children residing in the home on a single CIS. Foster children who are siblings and reside in the same foster home may be included on the same form. Do not include monies given to the household for care of the foster child in the foster child's income.

Adult Programs

Sponsors of Adult Day Care Programs, see [Chapter 21 Adult Day Care](#) for additional information on determining adult participant eligibility with CIS.

Section D - Approving Confidential Income Statements

Enrollment in a center or participation in CACFP cannot be contingent upon the parent/guardian or adult participant completing the CIS. Sponsors are not required to have a CIS for every participant and parents/guardians or adult participants cannot be required to submit a CIS.

When the sponsor receives a completed CIS from a parent/guardian or adult participant, an eligibility official of the sponsor must review, approve, sign and date in the appropriate space on the front of the form.

Only complete CIS forms containing all required information can be approved as Free or Reduced-Price eligible. Refer to the current fiscal year Letter to Households for instructions on information required on the CIS from the household.

The sponsor must classify the participant as Above Scale if:

- A parent/guardian or adult participant chooses not to complete a CIS form,
- If required, a parent/guardian or adult participant refuses to include the last four digits of the Social Security Number (SSN) or, check the box indicating the signer has no SSN

Sponsor officials may not complete any part of the household section of a CIS for a parent/guardian or adult participant unless the parent/guardian or adult participant cannot read or write, has a disability, and requires assistance, or requests or requires sponsor assistance to complete the CIS for any other reason identified by them.

Sponsor Approval Section

Sponsor officials approve the CIS following these steps:

Qualifying based on SNAP/TANF or FDPIR

- If qualifying using a SNAP or TANF case number, ensure that it is a valid case number. See [Section E - Common Errors That Can Be Costly](#) in this chapter for more information.
- As of July 1, 2023 both Employment Related Daycare (ERDC) and TANF are able to be received by families. Ensure that the case number listed on the CIS is a TANF case number as qualifying for ERDC does not qualify households for Free Eligibility in the CACFP.
- If the household is qualifying based on SNAP, TANF, or indicates they receive FDPIR, check the Free eligibility box and qualify all children in the household as having Free eligibility
- Check either the SNAP/TANF or FDPIR box as the basis of the eligibility.
- Sign and date the form.

Qualifying by Income

- If the household is qualifying based on income, record the total monthly income. If the household records income as being received weekly, every two weeks, twice a month or yearly, convert the income to monthly. Use the conversion factors on the back of the CIS form to make the change.
- Record the number of people in the household. Be sure all household members are listed on the form by name. Note that the number listed in Section 1 under "Number living in this household" may not match the number of people actually listed on the form. Sponsors may check with parent/guardians to ensure information listed is correct and allow corrections made by the parent/guardians. If the parent/guardian is non-responsive, the number of people in the household used to qualify the participant must be based on who is actually listed on the form and not the number listed in Section 1.
- Determine the correct eligibility category using current household income by month and size of household compared to the [Federal Income Guidelines](#). Qualify the family as Free, Reduced or Above Scale by checking the appropriate box and check Household Income as the basis for the eligibility.
- Sign and date the form.

Qualifying Foster Children

- Qualify the foster child's eligibility as free and check the foster child box as the basis for the eligibility.
- Sign and date the form.

Second Check Signature

The Sponsor Approval Section includes a 2nd Check Initial line. Having all CIS forms reviewed by a second person is recommended but not required. The individual completing the second review would sign and date the form.

Section E - Common Errors That Can Be Costly

During announced or unannounced administrative reviews, ODE CNP staff will review CIS forms used to create the One Month Enrollment Roster (OMER) for completion and accuracy. If errors are found resulting in over-claims, the sponsor may be required to return funds to ODE CNP.

ODE CNP will classify participants as Above Scale when the following information is missing from the approved CIS on file:

- Last four digits of the Social Security Number of the person signing the CIS (or a checkmark that the signer has no SSN) for income eligibility CIS forms
- A valid SNAP or TANF case number for categorical eligibility CIS forms
 - Valid SNAP Case Numbers:
 - 8 character format: 2 letters, 3 numbers, 1 letter, 1 number, 1 letter
 - 9 character format: the letter F followed by 8 numeric characters
 - 8 digit format: the number 4 followed by 8 numeric characters
 - Examples of a legitimate SNAP case number include: F00-00-0000 or 000-00-0000 (Social Security Number) or AB000C0D or 400000000
 - Valid TANF Case Number: a mix of 6 alpha numeric characters. Examples include: AB1234 or ABC123
 - Social Security numbers can still be accepted as valid case numbers (9 numeric characters)
- All household members not listed by name on income eligibility CIS forms. (Households may or may not include foster children when qualifying by income.)
- Signature of parent/guardian or adult participant, as applicable
- Date parent/guardian or adult participant signed the form
- CIS not approved, signed, and dated by Sponsor Eligibility Official
- CIS signed by the Sponsor's Eligibility Official more than 12 months ago
- Lost or otherwise missing CIS forms not on file for participant categorized as Free or Reduced-Price eligible

Other errors that may result in administrative review findings and/or revised eligibility determination:

- Total income added incorrectly

- Number of household members added incorrectly
- Using an outdated form (from a previous fiscal year)
- Free, Reduced-Price, or Above-Scale category not checked by Sponsor
- Participant placed in the wrong eligibility category by Sponsor
- Parent/guardian or adult participant was not given a copy of the Letter to Households

Section F – Frequently Asked Questions

Can CIS and CEF forms be completed electronically?

Yes, these forms may be completed electronically by the parent/guardian. ODE CNP recommends having a process in place for providing and receiving the forms, as well as making the hard copy forms available for parents/guardians who may not have access to a computer.

Do parent/guardians need to provide documentation to support the information listed on their submitted CIS form?

No, additional documentation is not required to be submitted by the parent/guardian. When the parent/guardian signs the CIS form, they certify that all information listed on the form is true and correct.

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Chapter 4: The One Month Enrollment Roster (OMER)

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This chapter does not apply to At-Risk Afterschool sites and Emergency Shelter programs.

This chapter only applies to Head Start sponsors (Oregon Head Start and OHS Pre-K) that are claiming sibling and/or community slot meals. See [Chapter 18 Head Start](#) for additional instructions.

Section A – The Percentage Reimbursement Method

ODE CNP uses the percentage reimbursement method to determine a sponsor's unique reimbursement rate. Meal reimbursement is based on each sponsor's percentage of Free, Reduced-Price, and Above Scale participants who are enrolled during the month of October at each approved CACFP site.

Each sponsor's unique percentages are calculated by ODE CNP, based on the One Month Enrollment Roster (OMER) submitted on the October reimbursement claim in CNPweb. The OMER percentages are in effect for the entire fiscal year. For most sponsors, October's enrollment is representative of enrollment patterns for the rest of the year.

Section B – Developing the One Month Enrollment Roster

The OMER specifies the number of center participants in each eligibility category that were enrolled in the report month. The OMER must include *all* enrolled center participants, including infants and drop-ins. It is the sponsor's responsibility to report the number of Free, Reduced-Price and Above Scale participants and the number of participants enrolled in care during the first month of the fiscal year (October) for each approved CACFP site by creating the OMER. Once the OMER is created, the sponsor must report the OMER numbers on the first reimbursement claim of the fiscal year, usually October, in CNPweb. After the first reimbursement claim of the fiscal year is submitted, the online claiming system "locks in" the free, reduced-price, and above scale enrollment numbers for the rest of the Program year unless the sponsor is approved to use revised numbers.

Required Records Needed to Develop the OMER for Each Approved Site

1. CACFP One Month Enrollment Roster (OMER): The OMER is an electronic Excel tool created by ODE CNP that captures the participant's name and eligibility category designation (Free, Reduced-Price or Above Scale) for the OMER month. An OMER must be created for each approved CACFP site.

Sponsors who use an electronic database system capable of creating a CACFP Child or Adult Enrollment Roster may request approval to utilize an alternate roster form. Sponsors must submit a copy of the proposed roster form to their assigned Child Nutrition Specialist for approval prior to use. Roster forms must include all data elements contained in the ODE CNP form.

2. Enrollment Documents: Current and valid enrollment documents are required for all participants from each site for the OMER month--usually October. (See [Chapter 3 Section A](#) for requirements for each program type)

Note: Outside School Hours Care Centers (OSHCC) and Adult Day Care Centers will use the Sponsor's own enrollment documents to determine participants to be listed on the roster.

3. Eligibility Documentation: Current and valid eligibility documentation is required for all participants listed as Free or Reduced-Price on the OMER. This documentation may be: approved CIS forms or other allowable eligibility documentation (See [Chapter 3 Section B](#) for additional information on eligibility documentation)

Create a CACFP Child or Adult Enrollment Roster

Step 1: Collect all required documents based on site type, enrollment documentation, eligibility documentation, etc. Ensure all documents are valid for the OMER month

Step 2: Create the OMER by following the instructions on the Instruction sheet of the OMER.

Note: Outside School Hours Care Centers (OSHCC) and Adult Day Care Centers will use the sponsor's own enrollment documents to determine participants to be listed on the roster.

Tips for creating the CACFP One Month Enrollment Roster:

- Check to make sure the Enrollment Roster does not include participants who have incomplete, invalid, or missing enrollment documents in the OMER month.
- Mark the appropriate eligibility category box for each participant on the Enrollment Roster (Free, Reduced-Price, Above Scale) based on their complete, accurate and approved CIS or other allowable eligibility documentation.
- Mark participants who do not have a complete, accurate and approved CIS, or other allowable eligibility documentation in the Above Scale category. Note: At the top of the OMER document, the sponsor may choose the effective date of eligibility to be either the parent/guardian's signature date or the determining

official signature's date. Ensure that whichever is indicated in that section of the OMER is what is entered consistently in the column headed "CIS Determination Date".

- For multi-site sponsors, if a participant attends more than one site during the OMER month, the participant must be included on the CACFP OMER for *one site*, only. The sponsor may choose which site's CACFP One Month Enrollment Roster will include the participant's name.

The CACFP OMER Excel document will automatically total the Free, Reduced-Price and Above Scale eligible participants in the "One Month Enrollment Roster (OMER)" block at the top of the form. If the form is not totaling, there is an error in the form.

Step 3: Double-check the OMER for accuracy. ODE CNP recommends having a designated staff member, who is trained on completing the OMER, conduct a double check of the OMER prior to reporting the numbers in the reimbursement claim.

Step 4: Save the OMER electronically. As this document contains sensitive information regarding participant's eligibility status, it is required that this document be kept in a secure and confidential location.

Step 5: Report the verified OMER numbers on the first reimbursement claim of the fiscal year. Refer to the next section for more detail.

Head Start programs see [Chapter 18 Head Start Programs](#) for additional information on the OMER.

Adult Programs see [Chapter 21 Adult Day Care](#) for additional information on the OMER.

Report the OMER

Use the numbers totaled for each category (Free, Reduced-Price and Above Scale) in the OMER block on the top section of the CACFP One Month Enrollment Roster to report on the first claim of the fiscal year in each CNPweb Site Claim under: Center Operating and Enrollment Data (Must reflect the claiming period) in fields 1-4.

For months other than the first claim of the fiscal year, usually October, CNPweb will enter the numbers as recorded on the first Site Claim.

Section C - Common Errors That Can Be Costly

During administrative reviews, ODE CNP will reconstruct the OMER from enrollment records; the CACFP One Month Enrollment Roster; and a review of CIS forms and other

allowable eligibility documentation based on the sponsor's maintained documents. The following are some errors that will require ODE CNP to adjust the OMER, which may result in past claims being over paid and/or may affect the amount of reimbursement for future claims.

- Counting a participant who was not enrolled in the month the OMER is being created for
- Not counting all participants (including infants and drop-ins) who were enrolled in the month the OMER is being created for
- Not having complete, current, and valid enrollment documents for all participants
- Not having a complete, valid—and approved CIS form or other allowable eligibility documentation for each participant counted in the Free or Reduced-Price categories
- Using CIS forms that were signed by the sponsors eligibility official more than 12 months before the OMER month
- Incorrectly recording the eligibility category on the CIS form or on the CACFP Child Enrollment Roster
- Incorrectly transcribing the totals for Free, Reduced-Price and Above-Scale eligible participants from the OMER block on the top of the CACFP One Month Enrollment Roster to the CNPweb site claim for an approved site.
- Not creating an OMER annually and instead reporting the previous fiscal year's numbers for the report month

Section D – Frequently Asked Questions

Do I need to submit my OMER to my Child Nutrition Specialist?

No, the OMER does not need to be sent to ODE. It must be saved in the sponsor's files and made available upon request or during an Administrative Review.

Do I need to update my OMER if I have new participants mid-year?

No, it is not a requirement that the OMER be updated mid-year, even if you've added or removed participants. For most sponsors, October's enrollment is representative of enrollment patterns for the rest of the year. If there are significant changes that affect the reimbursement, a revision may be requested.

Even though the OMER isn't required to be updated, sponsors do need a tracking system in place to ensure that CEFs are collected for all participants enrolled throughout the year. Meals cannot be claimed for reimbursement for participants without a valid CEF.

I've had a large change in enrolled participants in the middle of the year, can I change my OMER numbers?

If the revision has a significant impact on reimbursement, a sponsor may reach out to their assigned Child Nutrition Specialist requesting an OMER revision.

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Section A – Daily Attendance Records

All sponsors are required to maintain accurate and legible daily attendance records for participants in care ([7 CFR 226.15\(e\)\(4\)](#)). Daily attendance records must be dated with the day, month, year, and must be maintained separately from the site's meal count records.

Note: Attendance can be recorded on the same form as meal counts; however, they must be completed as separate actions, and the documentation must clearly identify each action.

Attendance records show which participants were in care and are used to support monthly meal counts. They are also used to conduct the five-day reconciliation during site monitoring and for other internal control purposes. Sponsors must retain completed attendance records on file in accordance with CACFP requirements (three years plus the current fiscal year).

Oregon's Child Care Licensing Division (CCLD) has specific rules in which all CCLD Licensed centers must follow. All CACFP centers that are not licensed by CCLD, including CCLD Recorded Programs, must follow ODE CNP requirements.

Arrival/Departure Times

Arrival/departure times, also called in/out times, are required to be documented on daily attendance records for most program types. These times are recorded by either a parent/guardian or center staff member. Certain program types which have a distinct beginning and end time may be approved to use the present/absent attendance method (see section below). Additionally, any participants who arrive and depart more than once during the day must have both arrival times and both departure times recorded. Attendance records must be accurate and up to date at all times. Sponsors must have a process in place to capture any in/out times that may have been missed upon arrival or departure.

Present/Absent Attendance Method

Certain program types that have a distinct program or school day with set begin and end times with most participants arriving and departing at the same time each day may be allowed to use the present/absent attendance method. When using this method, sponsors indicate on the attendance records only whether the participant is present or absent, and the actual in/out times are not recorded.

However, if a participant arrives late or departs early (outside the normal program/school day), then the actual in/out time must be documented. Additionally,

if the participant arrives and departs more than one time during the day, then all in/out times for the day must be documented. For example, a participant attends a Head Start class that runs from 8 AM to 1 PM. The participant leaves at 9:30 AM for an appointment and returns at 10:30 AM. Those in/out times must be documented, to show that the participant was not in attendance between 9:30 AM and 10:30 AM. The present/absent attendance method allows sponsors to simplify the attendance record keeping process; however, the purpose of attendance remains the same – the records must clearly indicate which participants are in care at any point in time.

Note: Not all program types are approved to use the present/absent attendance method, including CCLD Licensed Centers. Please refer to the Attendance Record Requirements below.

Electronic Records

Sponsors may choose to maintain attendance records through an electronic records system. This system must include all of the required attendance record components and there must be a back-up system in place in case the electronic system is unavailable. Additionally, all records must be easily accessible to staff members and must be retained per CACFP requirements (three years plus the current fiscal year).

Attendance Record Requirement Table

The table on the next page outlines the required information for an attendance record by program type.

Table: Attendance Record Requirements

Record Information Item	CCLD Licensed Centers ¹	CCLD Recorded Programs (Not Head Start)	Outside School Hours Care Centers (OSHCC)	Head Start (Not CCLD Licensed, includes CCLD Recorded)	School District Operate d Child Care Centers	At-Risk Afterschoo l Centers	Emergency Shelters	Adult Day Care Service Centers
License Exempt?	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Attendance Date (month, day & year)	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Participant Name	Yes (Must list first & last name)	Yes (Must list first & last name)	Yes (Must list first & last name)	Yes (Must list first & last name)	Yes (Must list first & last name)	Yes (Must list first & last name)	Per Sponsor Policy	Yes (Must list first & last name)
Arrival and Departure times required ²	Yes	Yes	Yes	No*	No*	No*	No	Yes
Present/ Absent attendance method may be used ³	No	No	No	Yes	Yes	Yes	Yes	No
Attendance Records - must be accurate at all times	Yes	Yes	Yes	Yes	Yes	Yes	Per Sponsor Policy	Yes
Electronic Record System may be used ⁴	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

1. *CCLD-licensed centers must follow CCLD rules for recording daily attendance per OAR 414-305-0250. Effective 1/1/2024, daily attendance records must include the child's full name.
2. Arrival/Departure: CCLD license exempt centers must have a system to record accurate attendance times when center staff, parents, guardians, or adult participants forget to sign in and out. The In/Out times should be recorded as soon as possible after a participant arrives or departs and initialed by center staff.
 - a. * Programs approved to use Present/Absent attendance method must document actual in/out times if participants arrive/depart outside the regular schedule OR if they arrive/depart more than one time per day.
3. Present/Absent method may be used in the program types as listed, if the programs have a set schedule where participants arrive and depart at the same general times. Any arrival or departure outside of the normal hours require actual in/out times to be recorded.
4. Electronic Record Systems: Effective 1/1/2024, paper *or electronic* attendance may be used for each group of children. Electronic records must be accessible to all caregivers and must be portable for use during an emergency evacuation. ODE CNP will follow this policy when reviewing CCLD-licensed centers.

For more information on attendance record requirements for specific programs, see the recordkeeping section in the following chapters:

- [Chapter 16 At-Risk Afterschool Programs](#)
- [Chapter 17 Emergency Shelters](#)
- [Chapter 18 Head Start Programs](#)

Total Monthly Attendance

Sponsors will need to calculate the total monthly attendance for each sponsored site when completing the monthly claim for reimbursement in CNPweb. Total monthly attendance for a site is calculated by adding together the total attendance for each operating day in the claim month.

Example:

Week	Monday	Tuesday	Wednesday	Thursday	Friday	Total
1	20	21	19	20	20	100
2	15	15	19	20	20	89
3	17	17	18	19	20	91
4	20	20	19	20	15	94

Total Attendance: 374

Section B – Meal Counts

Daily counts of the number of meals served by type (breakfast, lunch, supper, and snacks), taken at the point of service, must be recorded and maintained by all sponsors ([7 CFR 226.15\(e\)\(4\)](#)). All meal counts must be dated with day, month, year and must clearly indicate which meal was served. The following regulatory guidelines outline additional meal service requirements:

- **Child care centers, Head Starts, Outside School Hours Care Centers, and adult day cares:** A maximum of two meals and one snack or two snacks and one meal per participant per day may be claimed for reimbursement.
- **At-Risk Afterschool Programs*:** A maximum of one snack and one meal per participant per day may be claimed for reimbursement.
- **Emergency shelters*:** May be approved to claim up to three meals (breakfast, lunch, supper) or two meals and one snack per participant per day.
- Sponsors may claim only one meal for reimbursement per participant, per meal service.
- Sponsors may claim reimbursement only for the meal types (breakfast, lunch, supper, and snack) approved by ODE CNP on the Sponsor Site Information sheets in CNPweb.
 - Note: All meals must be approved by ODE CNP **before** the meal service operations begin.

* For more information on the program-specific meal count requirements, please see the recordkeeping section of the following chapters:

- [Chapter 16 At-Risk Afterschool Programs](#)
- [Chapter 17 Emergency Shelter programs](#)

Adult and Non-Enrolled Participant Meals

All meals served to adults, or any non-enrolled participants, must be recorded but they may not be claimed for reimbursement. An adult meal falls into one of two categories – a program adult or a non-program adult. A program adult is an adult who performs labor necessary to the food service. Any adult who does not have a role in the food service is considered a non-program adult.

Sponsors that choose to serve adult meals must have a method to track each type of adult meal. This can be done by adding columns or boxes on the meal count form, or the sponsor can choose another method. Sponsors must follow this same procedure for any other non-enrolled participant that receives a meal under CACFP, that does not fall into the Program/Non-Program Adult category. An example of a non-enrolled

participant would be a child in care who does not have a current, valid Child Enrollment Form on file.

Note: Meals served to adults cannot be claimed for reimbursement. The cost of the meal for **Program** Adults can be covered by the Non-Profit Food Service Account. For all **Non-Program** Adult Meals, the cost of the meal must be covered by non-Program funds or the adult must pay for their meal. See [Chapter 7 Non-Profit Food Service](#) for more information on allowable costs.

Point-of-Service Meal Counts

Meal counts must be taken and recorded at the “point-of-service” for the specific meal service style chosen by the Sponsor (see [Chapter 10 Meal Service and Menu Records](#) - under [Section A](#) Styles of Meal Service for descriptions of meal service types). The point-of-service is the point in time when the participant has received a complete, reimbursable meal in a cafeteria line, or when the participant is seated at the dining table with the complete, reimbursable meal set on the table. The point-of-service meal count must be taken once a participant has the complete, reimbursable meal but before the participant leaves the cafeteria line, or before the participant leaves the table. Meal counts cannot be taken after participants leave the cafeteria line or the table.

The point of service meal count must be taken by a staff member who is supervising or observing the meal service.

In Family Style, Restaurant Style or Combination Style meal service participants who come to the table with the intention of eating and are served a reimbursable meal, may be included in the meal count even if they do not eat.

Any meals that were not documented during the point-of-service must be disallowed and not included in the monthly CACFP reimbursement claim.

Meal Count Methods

There are two methods for taking and recording meal counts. Sponsors may choose which method they would like to use, with the exceptions listed below.

Actual Count: The point-of-service “actual count” method records the reimbursable meals served to each participant, by name (first and last). The Daily Meal Count - Actual Count Method form is available from the [ODE CNP CACFP Page](#) or sponsors may develop their own “actual count” form.

Note: Actual Count is required when:

- Sponsors are approved to serve more than 2 meals and 1 snack or 2 snacks and 1 meal.
 - Sponsors must have a procedure in place describing how they will indicate on the meal count record which meals are to be claimed for reimbursement, or which meal(s) will be disallowed, when a participant is served more than the maximum 2 meals/1 snack or 2 snacks/1 meal per day.
- Sponsors operate a Pricing Program (participants are charged for meals)
- Meals are served at emergency shelters
- When ODE CNP has made a determination that actual count is required by the sponsor.

Head Count: The point-of-service “head count” method tallies the meals by counting the total number of participants receiving a reimbursable meal and documenting the number on the Daily Meal Count - Head Count Method form available from the [ODE CNP CACFP Page](#). Sponsors may use the ODE CNP form or create their own “head count” form.

Infants

Meal Count Records for infants are tracked separately due to their need to be fed “on demand.” Infant meal counts are documented on the Daily Infant Menu Record forms, which are designed to document both the meal served and the daily meal counts. For more information, refer to [Chapter 11 Infants](#) in this manual.

Meal Count Methods that are NOT Acceptable:

The following are examples of meal count methods that are NOT acceptable:

- Counting the number of participants in attendance as the meal count
- Counting the number of meals prepared or sent by the kitchen
- Determining the meal count by subtracting the number of entrees left over after the meal service from the number of entrees prepared
- Counting the number of meals ordered from a vendor
- Counting meals after the meal is completed based on teachers’ memory
- Counting the number of trays or plates on which food is served

The best practice is to keep meal count forms in a notebook, folder, clipboard, or on a bulletin board in the meal service area so that the meal service staff can easily find and record meal counts. Sponsors should maintain completed point-of-service meal count forms and summary or meal count consolidation sheets in a file with other monthly CACFP claim records. Sponsors must retain all meal count records in

accordance with CACFP requirements, which is three years plus the current fiscal year.

Meals that Cannot be Counted or Claimed for Reimbursement

The following meals may not be counted for claiming during a point of service meal count:

- Meals that do not meet the meal pattern requirements, as described in [Chapter 10 Meal Service and Menu Records](#)
- Meals served with missing or non-creditable components to participants who do not have a complete and accurate Medical Statement on file
- Meals served to any non-participant adults (teachers, parents, volunteers, staff)
- Meals served to participants who do not have a current CACFP enrollment form on file, if required
- Meals served outside the approved meal times
- Meal counts that are in excess of the daily attendance count
- Meals that were not documented during the point-of-service

Section C – Common Errors That Can Be Costly

The following attendance and meal count errors are sometimes found during administrative review and can result in meals being disallowed:

- Not maintaining attendance records separately from the daily meal counts
- Recording attendance before the participant arrives
- Recording attendance as “in” after the participant leaves
- Recording a participant’s anticipated or estimated arrival or departure time rather than the actual time
- Not recording split attendance for participants who leave and return the same day
- Not recording arrival and departure times for staff members’ children who are in care
- Not recording the arrival and departure of participants who are transported by bus or van
- Not properly recording a point-of-service meal count
- Claiming a greater number of meals than are supported by attendance records
- Claiming more than two meals and one snack or two snacks and one meal per participant per day
- Claiming meals that did not meet meal pattern

- Calculation errors in consolidating meal counts when preparing the reimbursement claim
- Missing dates on attendance records and meal count records
- Claiming meals for a meal service that was not approved in advance by ODE
CNP

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Section A – Preparing for the Monthly Reimbursement Claim

Each month, sponsors input information about attendance and meal counts into [CNPweb](#) to determine the amount of reimbursement that will be received. This information must be accurate and supported by CACFP records.

Sponsors need the following records to prepare a monthly reimbursement claim for each participating site:

- Daily attendance records for the claim month
 - Sponsors must verify the accuracy of the claim for reimbursement by ensuring all meals claimed have supporting attendance record documentation.
 - These will also be used to calculate the total monthly attendance for the site claim in CNPweb. See [Chapter 5 Attendance and Meal Counts, Section A - Attendance Records](#).
- Daily point-of-service meal count records for the claim month
- Working menus or production records for the claim month, including required supporting documentation and Daily Infant Menu Records, if applicable
 - ODE CNP requires sponsors to review the actual menu served before including meals in the monthly claim for reimbursement to ensure all meals served were reimbursable.
- Approved *Site Information Sheets* on CNPweb for the meal types, times, and locations served during the month.
- Enrollment Documentation (if required)
 - Child care centers and Head Starts are required to use the CACFP Child Enrollment Forms
 - Adult day care and Outside School Hours Child Care (OSHCC) Centers may use center enrollment documentation
- **Adult day care, OSHCC, child care, and Head Starts with community slots, during OMER month only:** The CACFP One Month Enrollment Roster (OMER)
- **For-Profit sponsors:** Monthly For-Profit Eligibility roster and supporting documentation

To confirm the accuracy of your records, answer the following questions:

1. Are attendance records complete and accurate? (See [Chapter 5 Attendance and Meal Counts](#))
 - a. If not, investigate further to determine accurate information. Only complete and accurate records can be used for the claim.
2. Are meal counts for each meal either the same or lower than the attendance numbers? ([Chapter 5 Attendance and Meal Counts](#))

- a. If not, investigate further to determine accurate information. Meal count numbers for each meal cannot exceed attendance on the claim.
 - b. Point-of-service meal counts must be tracked separately from attendance records. Attendance records may not be used in place of point-of-service meal count records.
3. Do working menus/production records and supporting documentation meet meal pattern requirements? (See [Chapter 9 Meal Pattern Requirements](#))
 - a. If not, refer to your policies and procedures to disallow meals and/or snacks that do not meet requirements from the total meal counts prior to submitting the claim for reimbursement.
4. Have *Site Information Sheets* on CNPweb been updated with any site updates, including any meal type updates?
 - a. Meal types may only be claimed for approved sites, meal types, and days. Make sure to update *CNPweb Site Information Sheets* before implementing changes.
5. **For adult day care, OSHCC, child care, and Head Starts:** Are *CACFP Child Enrollment Forms or Center Enrollment Forms on file for all participants included in the meal count? (See [Chapter 3 Participant Enrollment and Eligibility](#))
 - a. "Disallow" meals for participants without a current and valid CACFP Child Enrollment Form or Center Enrollment Form on file.
6. **For adult day care, OSHCC, child care, and Head Starts with community slots, during OMER month only:** Is the OMER complete and accurate? (See Chapter 4: The One Month Enrollment Roster)
 - a. If the OMER is not complete and accurate, update the OMER before submitting the claim.
7. **For- Profit Sponsors:** Does the monthly For-Profit Roster show that 25% or more of participants are eligible Free/Reduced Price meals as required?
 - a. If not, meals cannot be claimed for the month.

***Note: OSHCC and adult day care centers** will use the sponsor's own enrollment documents.

Consolidating Meal Counts

At the end of each week or month, add the total number of reimbursable breakfasts, lunches, suppers, and snacks served to participants. Count no more than two meals and one snack, or two snacks and one meal for any single participant on a given day. Most sponsors use a summary sheet to tally counts from each site or classroom. Have a second staff person check meal count tallies before submitting the reimbursement claim.

At-Risk Afterschool Meals and Snacks programs may claim one At-Risk snack and one At-Risk supper per participant per day ([7 CFR 226.17a\(k\)](#)). See [Chapter 16 At-Risk Afterschool Programs](#) for more information.

Emergency Shelter programs may claim up to three meals (breakfast, lunch, supper) or two meals and one snack per participant per day. See [Chapter 17: Emergency Shelters](#) for more information.

Section B – How to Submit a Claim

CNPweb Access

ODE CNP has a web-based sponsor database system called “[CNPweb](#).” To be reimbursed for meals and snacks served, sponsors must complete and submit a monthly on-line Sponsor Claim, which includes individual Site Reimbursement Claims for each approved site. Sponsors may only submit claims for the months, days, times, and meal types entered on each *Site Information Sheet* and approved by ODE CNP in CNPweb. **ODE CNP recommends sponsors check CNPweb Site Information Sheets regularly to ensure they accurately reflect the CACFP operations at the site.** Sponsors may submit the claim manually or through an electronic upload.

To submit claims online, individual users must have a secure user ID and password to access CNPweb. The user ID and password are assigned when the sponsor submits a CNPweb User Authorization & Request form. Current sponsors must use the **CNPweb User Authorization & Request form** to add new users. To delete users, Sponsors must use the **User Authorization Termination** form. Both forms are available on the **Packet tab** on the CNPweb Sponsor Summary page under the CNPweb Forms & Resources heading. The user ID and password are equivalent to an original signature on a paper claim for purposes of official documentation. When using the user ID and password, the user is certifying the information transmitted electronically is complete and accurate and all required documentation is on file with the Sponsor.

Each user must have a unique username and password known and used only by them. ODE CNP does not maintain a list of passwords. Sponsors are encouraged to record their unique user ID and password and keep them in a secure location for reference.

To maintain system security, ODE CNP recommends limiting the total number of system users to those staff with an official need to work in the system.

Complete and Submit a Monthly Reimbursement Claim

The CACFP Application packet must be in “Approved” status in CNPweb to submit a claim. Follow the steps below to submit a claim in CNPweb.

1. Login to CNPweb and click on the orange CACFP puzzle piece. Review information on the splash board and click **Continue**.
2. Select the CACFP fiscal year for the claim you will submit. As a reminder, the CACFP fiscal year is from October through September.
3. Select the **Claims** tab.
4. Click **Add** for the Sponsor Claim.
5. Scroll to the bottom of the Sponsor Claim page, leave the checkbox unchecked, and click **Submit**.
6. Click the **here** link to return to the Sponsor summary page.
7. Click the to open all applicable site/provider claims. Click **Add** for site/provider claim
8. Enter claim information and click **Submit**.
9. Correct any errors until status is *Complete*.
10. Repeat steps 10-13 for each site/provider claim. Click **Edit** for the Sponsor claim.
11. **Check the Certify box** (see image below) and click **Submit**.
12. When status of the Sponsor Claim is *Approved*, it will be paid with the next payment batch.

Once the monthly claim is complete and submitted, the claim should be in either “Pending Approval” or “Approved” status. **No changes may be made until after the claim has been moved to Paid status by ODE CNP.** To make revisions after payment of this claim has been made, see Section E – Revisions.

To submit a claim via file upload, please reach out to your assigned Child Nutrition Specialist.

CNPweb Quick Reference Guide

The CNPweb Quick Reference Guide--CACFP (located on the CNPweb packet tab under the CNPweb Forms and Resources heading), provides step-by-step instructions for common tasks in CNPweb, including submitting a claim. For instructions on how to submit the claim through electronic upload, please reach out to your assigned Child Nutrition Specialist.

Claim Errors

If the post-confirmation box that comes up after you submit your claim states that your claim is in "Error" or "Pending Submission" status, you *have not* submitted your claim for payment. You must do one of the following to complete submission:

- "Error" status for a **Site** claim: you must open the site claim page and determine what information is missing. Once all required information is entered, click "submit." The site claim should now show a status of "Complete."
- Note: If a site did not operate in the claim month, make sure to uncheck the month in the **Site Information Sheet** to clear errors. You will need to click the checkbox next to "Check here to submit this form to the State for Approval" and click Submit to send the *Site Information Sheet* into "Pending Approval" status. Once your assigned Child Nutrition Specialist has approved the change, the error should clear from your Site Claim.
- "Error" status for a **Sponsor** claim: you must open the sponsor claim page and determine what information is missing. If you need to keep the claim in "Pending Submission" status to make additional changes, scroll to the bottom of the sponsor claim and click **Submit**. If you are done with all entries and revisions, check the Sponsor Certification box in field 26 and click **Submit**.

The Sponsor Claim should now show a status of "Pending Approval" or "Approved."

View Reimbursement Value for Monthly Claim

On the **Sponsor Summary-Claims** page, click **View** for the Sponsor level monthly claim.

Scroll to the bottom of the claim form and click **View Summary**. CNPweb displays the Sponsor Claim Summary page with the claim payment information.

Click the "**here**" link at the bottom of the page to display the Sponsor Summary - Claims page.

****Note:** If the Sponsor Claim form was in Error status before, this action may remove the Error status, but it does not submit the Claim to ODE CNP for Payment.

Review Payments

You may review the amounts and statuses of past and current claim payments by clicking on the **Payments** tab on the Sponsor Summary page.

CNPweb guides and resources may be found on the **Packet** tab of your CNPweb Sponsor Summary page.

Section C – When to Submit a Reimbursement Claim

Sponsors are responsible for submitting reimbursement claims before the due date. ODE CNP recommends sponsors submit original claims by the 10th of the month following the claim month.

Keep in mind that claims are closed each Tuesday from 7am until 4pm for processing. If a holiday falls on a Monday, claims will be closed the Wednesday following the holiday instead.

The deadline for submitting an original claim is 60 days following the end of the claim month. The official submission date of a claim is the date the sponsor-level claim was certified and submitted on-line in CNPweb.

The CNPweb claims system will automatically adjust due dates during Leap Years. If the due date falls on a Saturday, Sunday, or Federal Holiday, the claim deadline will be the next business day.

CNPweb will not accept entry of claims after the dates shown in the Claim Due Dates chart in Section D – Due Dates. Refer to [Section F](#) for information on late claims.

Section D – Claim Due Dates

Month	60 Day Deadline
January*	April 1
February	April 29
March	May 30
April	June 29
May	July 30
June	August 29
July	September 29
August	October 30
September	November 29
October	December 30
November	January 29
December**	March 1

In a leap year:

*60-day deadline = March 31

**60-day deadline = February 29

Section E – Revisions

When errors have been made on the original claim submitted, sponsors may submit a revision to that claim.

Revised claims for an upward adjustment in reimbursement must be submitted within 60 days after the end of the claiming month (see **Reimbursement Claim Due Dates** chart above). Revised claims for a downward adjustment may be submitted at any time.

The revision needs to be submitted with the next original claim. Example:- If a downward revision to the September claim is discovered in May, the September claim would need to be revised when the May original claim is submitted.

If a sponsor repeatedly adjusts its claims downward after the 60-day submission deadline, a corrective action plan may be required. If required, a corrective action plan must be submitted in sufficient detail to demonstrate future compliance with the requirements. Regulations allow ODE CNP to withhold payments to the sponsor for all Child Nutrition Programs until procedures have been implemented for the sponsor to produce an actual final claim each month (see [7 CFR 210.24](#), [7 CFR 210.24](#), [7 CFR 220.18](#), and [7 CFR 215.15](#), [7 CFR 215.15](#); [2 CFR 200.338](#)).

To revise monthly claims in CNPweb please see instructions below or refer to the CNPweb Quick Reference Guide--CACFP located on the CNPweb packet page.

Revise a Claim

Only claims in *Paid* status can be revised. Follow the steps below to revise a claim.

1. Login to CNPweb and click on the orange CACFP puzzle piece. Review information of the splash board and click **Continue**.
2. Select the CACFP fiscal year for the claim you need to revise. As a reminder, the CACFP fiscal year is from October through September.
3. Click **Revise** in the line of the Sponsor Claim.
4. Scroll to the bottom of the page, leave the checkbox unchecked, and click **Submit**.
5. Click **Revise** for site/provider claim.
6. Revise data and click **Submit**.

7. Correct any errors until status is *Complete*.
8. Repeat steps 5-7 for each site/provider claim you need to revise.
9. Click **Edit** on the Sponsor Claim.
10. Check the Certify box and click **Submit**.
11. When status of Sponsor Claim is *Approved*, it will be processed.

Section F – Late Claims

Original claims may not be entered into CNPweb after the 60-day claim period. Revised claims for upward revisions may not be entered after the 60-day period has expired. See the [Special Circumstances – Disaster Response](#) subheading later in this section for information on late claims due to disasters.

Program regulations state that “... a final claim for reimbursement shall be postmarked and/or submitted to the state agency no later than 60-days following the last day of the full month covered by the claim. Claims not postmarked and/or submitted within 60 days shall not be paid with program funds unless FNS determines that an exception should be granted...” ([7 CFR 226.10\(e\)](#))

You may submit an exception request for:

Circumstances beyond your control - At any time, if your claim was late due to circumstances genuinely beyond your control, you may submit the claim with documented written evidence. We will analyze the evidence and make our determination as to whether the circumstances warrant payment. If we determine they do not, you may still request a one-time exception for circumstances within your control. Beyond Control exceptions must ultimately be approved by FNS.

Circumstances within your control (One-Time Exception) - A center/ sponsor may request a one-time exception for the submission of a late claim that was within their control. Such an exception will be granted for only **one late monthly claim within a 36-month period** per program (NSLP, SBP, SFSP, CACFP). If you submit more than one late claim, the month with the greatest value will be considered. Once this exception is granted, no future payment under this provision will be made within the subsequent 36-month period.

To submit an exception request, complete the **One Time Exception Request** form and submit it to the [Claim Exception Log SmartSheet](#) and notify your assigned Child Nutrition Specialist. This form can be found on the Packet Tab of CNPweb under the CNPweb Forms & Resources heading. An exception request for a late claim submission for either circumstance must include:

- Original claim for reimbursement
- Written description of events and circumstances that prevented claiming compliance, in sufficient detail to enable a fair decision
- Acceptable corrective action plan (CAP) with:
 - Actions to be taken to avoid any future late claim submissions for the same or other causes
 - A statement that says, “I understand that if this exception request is granted, the exception has been used for a three-year period and that no future payment of late claims, originals or upward revisions can be made to our program during this period” and
 - The signature of the person who signed the agreement with ODE CNP to operate your program or the signature of the person currently occupying that position (listed as the “Authorized Representative” on the Sponsor Information Sheet in CNPweb).
- Upon receipt of your exception request, ODE CNP will review it to determine whether it sufficiently addresses the reason for lateness and the actions to remedy the late submission. If your Corrective Action Plan (CAP) is approved, your late claim will be processed for payment. If it is not approved, ODE CNP will advise you as to which deficiencies need to be addressed. If deficiencies cannot be addressed, the CAP will be denied.

Special Circumstances–Disaster Response

In disaster situations, ODE CNP may approve sponsors to submit claims beyond the 60-day requirement. To submit an exception request, complete the **One Time Exception Request** form and submit it to your assigned Child Nutrition Specialist. This form can be found on the Packet Tab of CNPweb under the CNPweb Forms & Resources heading.

If sponsors need to reconstruct claims that have not been submitted due to loss of current records, they must consult with ODE CNP. ODE CNP may approve such requests in consultation with the FNS Regional Offices.

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Section A – Overview of Performance Standards

[7 CFR 226.6\(b\)\(1\)\(xviii\)](#)

Every CACFP applicant and sponsoring organization must demonstrate compliance with all three **Performance Standards**. The performance standards outline expectations for the administration of the CACFP, which are: **Financial Viability, Administrative Capability and Program Accountability**. These are commonly referred to as **VCA** (Viability, Capability, Accountability)

(V)=Viability: Applicants and sponsoring organizations must demonstrate they are a financially viable organization and CACFP funds are expended and accounted for in accordance with regulations.

(C)=Capability: Applicants and sponsoring organizations must have appropriate and effective management practices to ensure operations in accordance with CACFP regulations.

(A)=Accountability: Applicants and sponsoring organizations must have controls and other management systems in place to ensure fiscal accountability and program compliance with CACFP regulations.

VCA is demonstrated in the following:

- Adequate fiscal resources to operate the CACFP daily & during temporary interruption of Program payments
- Financial Reports (Profit & Loss, Balance sheet, etc.)
- Costs in the CACFP budget are appropriately documented
- Adequate number and type of staff to operate the CACFP
- Program policies and procedures in writing
- Financial system with management controls in writing
- Maintaining appropriate records to document Program compliance

Section B- CACFP Budget

[7 CFR 226.7\(g\)](#)

A CACFP budget must be completed at application. All sponsors (except School Food authorities) are required to submit a CACFP budget annually at renewal. School Food Authorities (SFAs) are not required to submit a CACFP budget, as they submit a district budget annually which contains the food service revenues and expenses.

The CACFP budget is a financial plan for CACFP revenue and expenses that supports activities in the *Management Plan*. The CACFP budget is not intended to be the entire

budget for the organization. It is a tool to support the expenditure of CACFP revenue on allowable expenses. It must identify an adequate level of funding for all required administrative functions, and the anticipated needs to operate the CACFP. All CACFP expenses require prior approval; the budget is the vehicle for ODE CNP to provide approval for CACFP expenses and is a spending plan for sponsors to use when charging expenses to CACFP. Only those expenses on the approved budget are considered allowable and may be charged to CACFP revenue.

CACFP Revenue & Expenses

[FNS Instruction 796-2 Rev. 4](#)

The CACFP budget must identify both Program revenue and non-program revenue.

- Program revenue is the amount of CACFP revenue anticipated to be earned based on the type and number of meals served to participants. It also includes any revenue received for the sale of meals:
 - To other sponsors,
 - To non-program participants, and
 - Revenue received from operating a pricing program.
- Non-program revenue includes other sources of organizational revenue such as donations, unrestricted funds, board designated funds, tuition, other grants, etc. All sponsoring organizations must identify sufficient non-program revenue available to pay for unfunded CACFP expenses and unallowable CACFP expenses.

Types of Expenses on the CACFP Budget

[FNS Instruction 796-2 Rev. 4](#) (VII D)

Operating expenses are expenses incurred to prepare and serve CACFP meals to eligible participants. Examples of operating expenses include, but are not limited to:

- Food
- Food Service Labor
- Nonfood supplies
- Food service equipment

Administrative expenses are expenses incurred for planning, organizing, and managing the CACFP. Examples of administrative expenses include, but are not limited to:

- Labor for time spent on CACFP duties such as: recordkeeping, monitoring, claim review & submission, providing training, and Program oversight
- Contracted professional services (bookkeeping, payroll services, etc.)
- Mileage reimbursement for site monitoring (multi-site sponsors only)

Note: CACFP administrative expenses are limited by regulations. CACFP administrative expenses must be tracked as actual, and the amount charged to the Nonprofit Food Service (NPFS) account must be limited to 15% of the reimbursement.

[FNS Instruction 796-2 Rev. 4](#) (Section VIII G) states that unallowable expenses may not be included in the NPFS Account and may not be charged to CACFP revenue. Examples of unallowable expenses include but are not limited to:

- Expenses not included in the approved budget
- Expenses not fully supported by source documentation
- Food purchased for: personal use, meals for meetings, restaurant meals, and non-creditable foods such as candy, soda, and potato chips
- Non-food supplies such as toilet paper, toothpaste, supplies for arts and crafts, or items of clothing
- The value of donated food
- Fees and/or charges for past due payments
- Entertainment and social function expenses
- Capital equipment purchases **without specific prior written approval**

Section C- CACFP Management Plan and Policies & Procedures

[Guidance for Management Plans & Budgets](#)

The CACFP *Management Plan* is designed for sponsors to document how their organization will manage the CACFP. It is a structure for CACFP sponsoring organizations to document that they have accurate and effective written policies and procedures in place to operate the Program in accordance with the Performance Standards. It also acts as a tool for ODE CNP to ensure sponsoring organizations document how they will operate the CACFP in compliance with the Performance Standards and regulations. All applicants and sponsors must complete a *Management Plan* on CNP web and update it as needed so it reflects current procedures and staff in key CACFP positions.

Written CACFP policies and procedures are not just a good idea, they are required as part of the performance standards for the operation of CACFP.

All applicants and sponsors must develop policies and procedures to reflect how they will maintain and manage their nonprofit food service (NPFS) account in accordance with regulations. At a minimum, the NPFS policies and procedures must identify each management control and include step by step processes including a verification step for each control answering: who, what, where, when and how.

The five management controls are:

- Fiscal Integrity of all Program funds
- Program funds are only used for authorized Program purposes
- Accountability of all expenses
- CACFP administrative expenses do not exceed regulatory limits, and
- Safeguards are in place to prevent improper financial activities

ODE CNP has created several financial management trainings to help sponsors meet CACFP requirements. This includes the [CACFP Financial Management Training Video](#), which includes a basic overview, the [Financial Management Workbook](#), and a [Financial Management Technical Assistance Training](#) that provides more information on the required management controls to be addressed in NPFS policies & procedures.

Section D- Financial Management System

[FNS Instruction 796-2 Rev. 4](#) (VI C)
[2 CFR 200.302](#)

All CACFP sponsors must maintain a Non-Profit Food Service (NPFS) for the benefit of enrolled participants. Non-profit food service requires Program reimbursement funds to be used solely for the operation of the food service operations conducted for the benefit of enrolled participants and costs incurred must be necessary, reasonable, and allowable for effective and efficient operation of the CACFP.

To document non-profit food service, sponsors must have a system to track and account for CACFP revenue and expenses separately from other organizational revenue and expenses. This does not require a separate bank account. This requires fund accounting to be in place within the accounting software. Maintaining a nonprofit food service account requires:

- CACFP revenue and expenses are tracked separately from organizational revenue and expenses,
- That only allowable costs per the approved CACFP budget and as supported by source documentation are charged to CACFP funds, and

- The balance of the NPFS account is documented each month
 - Any unspent CACFP revenue must remain in the NPFS account and be used solely for the improvement of the food service operations in future months
 - Any unfunded CACFP expenses must be paid for with non-program funds so that the NPFS balance is not negative. This requires sponsors to either complete a journal entry or transfer funds into the NPFS account so that there is not a negative balance.

Note: The term non-profit food service has nothing to do with the organization's entity registration. This term refers to how CACFP funds must be managed and accounted for.

Section E - Administrative Oversight

[7 CFR 226.6\(b\)\(1\)\(xviii\)](#)

The Child and Adult Care Food Program (CACFP) is a Federally funded Program that provides payments for eligible meals served to Program participants. Sponsoring organizations enter into agreements with the State agency, making the sponsor the ultimate responsible party for ensuring that all requirements of the agreement are met, including the assumption of final administrative and financial responsibility of the CACFP.

CACFP Administrative Oversight is the process of planning, organizing, and managing all aspects of CACFP operations. Administrative oversight is a Program requirement, and it is in place to ensure that all components of the CACFP are operated with integrity, accountability and in compliance with regulations. It is a continual process that requires sponsors to assess the effectiveness of systems and internal controls in place, to verify accurate and reliable operations and recordkeeping are in place, and to proactively identify and correct areas of noncompliance.

Administrative oversight and management may not be contracted out, but some administrative program activities may.

Allowable contracted administrative Program activities include:

- Hiring an outside bookkeeper to record financial transactions of the CACFP,
- Contracting with a Food Service Management Company to prepare and serve CACFP meals, and

- Contracting with a nutritionist or registered dietitian for consultation and review menus

Unallowable contracted Program activities include:

- Preparing application materials
- Completing Site Monitoring,
- Responding to Corrective actions, and
- Submitting Claims
- Contracting for staff training

Should sponsors choose to retain the services of a contractor to perform one or more Program activity, they are required to retain oversight of the work performed and accept final administrative and financial responsibility for the work performed by the contractor, including repayment of any funds due to non-compliance(s). This requirement is in place for all sponsoring organizations, regardless of sponsor type: public or private nonprofit organizations, for-profit organizations, school food authorities, tribal and governmental agencies. The responsibility for administrative oversight remains with the organization that entered the CACFP agreement.

Section F - Required Documentation

[FNS Instruction 796-2 Rev. 4](#) (VII A3)
[7 CFR 226.15\(e\)](#)

Sponsoring organizations must maintain documentation to support all CACFP expenses incurred and charged to CACFP revenue. Records may be maintained both electronically and in paper form. Regardless of format, they must be readily available for retrieval upon request by ODE CNP.

Source documents include but are not limited to receipts, bills, invoices, time sheets, time and distribution reports, mileage logs, bank statements, etc. During an administrative review, ODE CNP will review individual source documents to the bank statement to ensure all CACFP expenses have been paid.

Source document requirements by expense type:

Food and Nonfood Supply Purchase Invoices/Receipts:

[FNS Instruction 796-2 Rev. 4](#) (Exhibit B)

- Identify name of business/vendor,
- date of transaction,
- total amount,

- Identify items purchased, and
- payment method

Note: Any receipt or invoice that includes allowable and unallowable CACFP purchases must clearly identify each unallowable item, the cost of unallowable items, and include a sub total of allowable CACFP costs, and unallowable CACFP costs.

Labor Expense Source Documents Must Document:

[FNS Instruction 796-2 Rev. 4](#) (VIII I 23 c)

- Time sheets with start time, end time, employee & supervisor signature
- Time distribution reports are required for staff with CACFP & non-CACFP duties and staff with CACFP operational & administrative duties
- Payroll reports with rate of pay, hours worked, benefits earned, gross pay, net pay, date of payment, and method of payment

Note: Labor costs must be tracked as actual and may not be charged based on budget estimates.

Contracted Services and Allocated Cost Requirements:

Contracted services must be included in the CACFP budget and receive specific prior written approval from ODE CNP to be allowable [FNS Instruction 796-2 Rev. 4](#) (VIII F). Examples of contracted services include bookkeeping services, menu development, dietitian consultant, etc.

Contracted services must be supported by a signed contract and invoice. Additionally, the amount charged to CACFP revenue must be limited to the allocation percentage and amount on the approved CACFP budget.

Allocated costs must be included in the CACFP budget and receive prior approval from ODE to be allowable. [FNS Instruction 796-2 Rev. 4](#) (VIIB). Examples of allocated costs include utility costs like electricity, gas, and water and facility costs for rental and lease contracts.

Allocated costs must be supported by an invoice, and the amount charged to CACFP revenue must be limited to the allocation percentage and amount on the approved CACFP budget.

Section G: Bank Statement Verification:

Due to the USDA Food and Nutrition Services (FNS) [Child Nutrition Program Integrity Final Rule](#) that was released on August 23, 2023, State agencies are required to conduct a financial review of sponsoring organizations in CACFP and this was added into the regulations at [7 CFR 226.7\(b\)\(1\)](#). USDA clarified in [CACFP09-2024: Implementation Guidance: State Agency Financial Review Requirements](#) that this requires a one-month bank statement review for multi-site, non-School Food Authority sponsors only.

This integrity rule is meant to prevent the misuse of CACFP funds and ensure that State agencies are checking that CACFP reimbursements are being used for approved CACFP expenses.

ODE CNP is implementing this requirement with an **annual bank statement verification process** for multi-site sponsors who are community based, meaning that this does not apply to School Food Authorities (SFAs) since Oregon has other means of financial oversight over K-12 school districts. This verification process will be conducted for all applicable sponsors who are not receiving an Administrative Review in the fiscal year.

The annual bank statement verification process will be conducted throughout the year and sponsors will be notified in quarterly batches. Sponsors will receive notification of the verification via email and all requested documents must be submitted within two weeks. Requested documents will include a checklist, bank statements for all accounts with CACFP expenses or income, and all supporting documentation for approved CACFP expenses. ODE CNP [has a short overview training \(16:29\) that covers the basics of a bank statement verification and a detailed video guide \(33:08\)](#) for sponsors who are undergoing the verification process. The goal of ODE CNP's verification process is to see that sponsors are using CACFP reimbursements for approved CACFP expenses and that sponsors have a CACFP financial management in place.

Sponsors who do not respond to the verification notification will have findings issued and if sponsors fail to meet Performance Standards, this may result in a Serious Deficiency.

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Section A – General Information

Procurement is the process of acquiring, by lease or purchase, products, goods, and/or services such as food, supplies, equipment, bookkeeping, and auditing. The purpose of an effective procurement procedure is to ensure that such products, goods, and/or services are obtained efficiently, economically and in compliance with state and Federal law.

All procurement transactions will be conducted in a manner providing full and open competition consistent with the standards of [2 CFR Part 200 subpart D](#) and [7 CFR 226.22](#). Transactions must also follow state and local rules if more restrictive. All CACFP sponsors are required to follow the procurement regulations as outlined in USDA [FNS Instruction 796-2 Rev. 4](#), *Financial Management–Child and Adult Care Food Program*. Please visit ODE CNP's [Nutrition Procurement Resources public website](#) for more information.

Note: In accordance with [USDA memo CACFP 04-2013](#) School Districts (School Food Authorities–SFAs) participating in CACFP may follow the National School Lunch Program (NSLP) procurement standards found in [7 CFR 210.21](#) in lieu of CACFP procurement standards at [7 CFR 226.22](#). NSLP has comprehensive requirements in these areas and compliance with the NSLP requirements satisfies the intent of the corresponding CACFP requirements. In addition, SFAs are not required to:

- Maintain food inventories separately for the various Child Nutrition Programs

Section B – How to Procure

Determining an Acquisition Threshold

When obtaining goods and services with Federal funds, sponsors must ensure that procurement procedures are exercised in an effective manner and in compliance with Federal regulations, State General Statutes, and the sponsor's documented procurement procedures.

The simplified acquisition threshold set by Federal procurement law determines whether sponsors can use an informal procurement method or if they must use one of the formal procurement methods (see below-[Section C Procurement Methods](#)).

The State or sponsor may have more restrictive acquisition thresholds than those set by Federal procurement law. Sponsors must determine the appropriate procurement procedure for their organization.

Procurement Thresholds Table:

Procurement Method	Federal Threshold	State of Oregon Threshold	CNP Sponsor Procurement Threshold
Federal Micro-Purchasing / Oregon Small Procurements	Less than \$15,000	Less than \$25,000	Review internal procurement policies
Federal Small Purchase / Oregon Intermediate Procurement	Less than \$350,000	Less than \$250,000	Review internal procurement policies
Formal (IFB/RFP)	Greater than \$350,00 (Simplified Acquisition Threshold)	Greater than \$250,000 (Simplified Acquisition Threshold)	Review internal procurement policies

Developing Product/Service Specifications

Regardless of the procurement method used, specifications must incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product, or service to be procured, and, when necessary, must set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offers must be clearly stated. They must also identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

Common Specification Categories

- Form: Canned, chopped, whole, frozen
- Size: #10 can, 8x5 lb., 144 ct
- Delivery: During business hours, daily or weekly, delivery minimums
- Menu documentation: Product formulation statement or CN label required for commercial combination foods
- License: What kind of licensing and insurance do you require from vendors?
- Type: Whole grain-rich, low fat, individually wrapped
- Contract Provision: Applicable provision identified 2 CFR 200 Appendix II

Reference: [2 CFR 200.319\(d\)\(1\)](#)

Section C – Procurement Method

The procurement method to be used for a given purchase is determined by examining the manner in which products, goods and/or services have been purchased in the past. sponsors will examine past procurement patterns, vendors/contractors used, and total dollar amounts spent for each type of good and service in addition to the total dollar amount paid to an individual vendor/contractor during a single fiscal year.

Depending on the program type and the type of purchase, sponsors must use one of the procurement methods consistent with the standards of 2 CFR 200.320 and procedures consistent with 2 CFR 200.318, and 2 CFR 200.319.

Reference [2 CFR 200.320](#)

Informal Procurement Procedures

Reference: [2 CFR 200.320\(a\)](#)

Procurement by Micro-Purchases

If a sponsor is making a purchase with the aggregate dollar amount under the micro-purchase threshold, the sponsor may do so without soliciting competitive price or rate quotations if the sponsor considers the price to be reasonable based on research, experience, purchase history or other information and documents the files accordingly.

Purchase cards can be used for micro-purchases if procedures are documented and approved by the sponsor. To the maximum extent practicable, the sponsor should distribute micro-purchases equitably among qualified suppliers.

A sponsor may not artificially divide or fragment a procurement so as to constitute a micro-purchase.

Sponsors may establish a threshold higher than the micro-purchase threshold identified in the Federal Acquisition Regulation (FAR) in accordance with the requirements of [2 CFR 200.320\(a\)\(1\)\(iv\)](#). Sponsors may self-certify a threshold up to \$25,000 (State threshold) on an annual basis and must maintain documentation to be made available to the Federal awarding agency and auditors in accordance with 2 CFR 200.334. The self-certification must include a justification, clear identification of the threshold, and supporting documentation of any of the following:

- (A) A qualification as a low-risk auditee, in accordance with the criteria in 2 CFR 200.520 for the most recent audit.

(B) An annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or,

(C) For public institutions, a higher threshold consistent with State law.

The sponsor must keep all documentation supporting micro-purchases on file in accordance with the record keeping requirements.

Reference: [2 CFR 200.320\(a\)\(1\)](#)

Procurement by Simplified Acquisition Procedures

When the total cost of a good or service, or a group of similar items is less than the most restrictive simplified acquisition threshold, the small purchase procedure may be used. This procedure is sometimes known as a Request for Quote (RFQ) or comparison shopping.

A sponsor may not artificially divide or fragment a procurement so as to constitute a small purchase.

When conducting a small purchase, a sponsor shall seek at least three informally solicited competitive price quotes or competitive proposals from prospective contractors. The sponsor shall keep a written record of the sources of the quotes or proposals received. If three quotes or proposals are not reasonably available, fewer will suffice, but the sponsor shall make a written record of the effort the sponsor makes to obtain the quotes or proposals.

The sponsor must keep all documentation detailing the history of the procurement on file in accordance with the record keeping requirements.

References: [2 CFR 200.320\(a\)\(2\)](#) and [ORS 279B.070](#)

Formal Procurement Procedures

If the cost of a single good or service, or group of similar products, goods, and/ or services, is at or above the most restrictive simplified acquisition threshold, one of the formal procurement procedures must be used:

Reference: [2 CFR 200.320\(b\)](#)

Procurement by Competitive Sealed Bids or Invitation for Bid (IFB):

Competitive Sealed Bids, which are also known as Invitation for Bid (IFB), is a method in which bids are publicly solicited and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price.

In order for sealed bidding to be feasible, the following conditions should be present:

- A. A complete, adequate, and realistic specification or purchase description is available;
- B. Two or more responsible bidders are willing and able to compete effectively for the business; and
- C. The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the following requirements apply:

- A. Bids must be solicited from an adequate number of qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;
- B. The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
- C. All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
- D. A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
- E. Any or all bids may be rejected if there is a sound documented reason.

References: [2 CFR 200.320\(b\)\(1\)](#) and [7 CFR 226.22](#)

Procurement by Competitive Negotiations or Request for Proposal (RFP):

Procurement by competitive negotiations, which is also known as Request for Proposal (RFP), is a method in which either a fixed price or cost-reimbursement type contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids. They are awarded in accordance with the following requirements:

- A. Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Proposals must be solicited from an

- adequate number of qualified offerors. Any response to publicized requests for proposals must be considered to the maximum extent practical
- B. The non-Federal entity must have a written method for conducting technical evaluations of the proposals received and making selections
 - C. Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the non-Federal entity, with price and other factors considered, and
 - D. The non-Federal entity may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby offeror's qualifications are evaluated and the most qualified offeror is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms that are a potential source to perform the proposed effort.

Reference: [2 CFR 200.320\(b\)\(2\)](#)

Noncompetitive Procurement

There are specific circumstances in which noncompetitive procurement can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply:

1. The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (see [paragraph \(a\)\(1\)](#) of 2 CFR 220.320);
2. The item is available only from a single source;
3. The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation;
4. The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the non-Federal entity; or
5. After solicitation of a number of sources, competition is determined inadequate.

Reference: [2 CFR 200.320\(c\)](#)

Procurement Documentation

A sponsor must develop and have on file written procurement procedures that conform to the procurement standards identified in [2 CFR 200.318 through 200.327](#) and [7 CFR 226.22](#) for how the organization will:

1. Purchase products, goods, and/or services
2. Advertise (if needed) the products, goods and/or services it plans to purchase
3. Select and evaluate various bids or proposals submitted by potential vendors/contractors.
4. Evaluate potential vendors/contractors (e.g., the criteria that will be used for evaluation, such as integrity, compliance with public policy, past performance, and financial and technical resources)

Sponsors must maintain documentation on file for every procurement transaction made with CACFP funds. This documentation would include, but is not limited to:

1. Product or service specifications used in obtaining bids or quotes
2. Copies of the documentation of the prices submitted by potential vendors/contractors
3. Names of the vendors/contractors who submitted price quotations that were compared
4. Identifying which vendor/contractor was chosen
5. Stating why that vendor contractor was chosen

Request for quote (RFQ) documents need not be complex but must provide sufficient information to permit an eligible vendor to respond. At a minimum, include:

1. A description of the products, goods, and/or services needed, including quantity
2. The date by which the products, goods and/or services must be provided
3. Request for written price(s) or quote(s) including the time period during which the price(s) or quote(s) valid
4. If sponsors obtain prices and quotes orally, by phone or in person, they must maintain written documentation identifying the pertinent details of the transaction including:
5. The name of the sponsor representative soliciting the information
6. The names of the vendor/contractor solicited and the vendor/contractor representative providing the price or quote
7. The date the information was provided
8. The products, goods, and/or services to be purchased, including quantities upon which the price or the quote was provided
9. All terms or conditions imposed by either party
10. The time period during which the price or quote will be honored by the vendor/contractor

Sponsors must maintain documentation of the entire procurement process on file for three years plus the current fiscal year. During administrative reviews or audits, ODE

CNP will review procurement documentation for purchases made with program funds.

Combination Funding

A program receiving a combination of funding from different sources with different cost threshold requirements must adhere to the most restrictive cost threshold.

Open and Free Competition

Regardless of the method used, purchasing transactions must be conducted in a manner that provides maximum open and free competition. Procurement procedures may not restrict or eliminate competition. Examples of restrictive competition include:

1. Placing unreasonable requirements on firms in order for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Noncompetitive pricing practices between firms or between affiliated companies;
4. Noncompetitive contracts to consultants that are on retainer contracts;
5. Organizational conflicts of interest;
6. Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.

Reference: [2 CFR 200.319](#)

Use of Small and Minority Firms

The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

Affirmative steps must include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;

4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in [paragraphs \(b\)\(1\) through \(5\)](#) of 2 CFR 220.321.

In Oregon, the [Office of Business Inclusion and Diversity](#) has an online search option to find minority and women-owned businesses.

In order to complete the search, select Directory of Certified firms, ensure all certifications are checked and click to look up commodity codes.

Then click browse codes.

Code numbers 44 "Retail Trade" and 72 "Accommodation and Food Services" will be the area most frequently searched for Child Nutrition Program sponsors. By drilling down within those codes and choosing a location within the state, the search can be narrowed in scope.

Reference: [2 CFR 200.321](#)

Geographic Preference

While sponsors must ensure free and open competition, preference can be granted to unprocessed locally grown or locally raised agricultural products ([CACFP memo 08-2024](#)). The geographic area that is considered to be local is up to the purchasing institution. The purchasing institution may specifically identify the geographic area within which unprocessed, locally raised and locally grown agricultural products will originate in order to receive preference.

To be considered unprocessed, products must maintain their inherent characteristics. The following list contains the types of processing allowed in products considered unprocessed:

- Cooling: refrigeration, freezing
- Size adjustments: peeling, slicing, dicing, cutting, shucking, grinding
- Forming into patties: without any fillers or additives
- Drying or dehydration
- Washing
- Packaging: including vacuum sealing and bagging multiple fruits or vegetables together

- Adding Preservatives: ascorbic acid, etc.
- Butchering and cleaning meat poultry and fish
- Pasteurizing milk

Preference is usually granted through the addition of preference points in scoring criteria for bids. Scoring criteria must always be transparent to all bidders

Reference: [7 CFR 226.22](#)

Written Standards of Conduct and Performance of Employees Engaged in Award and Administration of Contracts

Sponsors are required to develop and implement written standards of conduct designed to govern the performance of employees engaged in procurement.

These standards of conduct must prohibit employees from soliciting gifts, travel packages, and other incentives from prospective contractors. In addition, the standards of conduct must prohibit an employee from participating in the selection, award, and administration of any contract to which an entity or certain persons connected to them, have financial interest. The standards of conduct must also provide for sponsors to set standards when financial interest is not substantial, or the gift is an unsolicited item of nominal value and may be acceptable. Finally, the standards of conduct must provide for disciplinary actions to be applied in the event the standards are violated.

[ODE CNP's procurement procedure template](#) includes a section on the written standards of conduct and should be adapted to fit each sponsor.

Reference: [2 CFR 200.318\(c\)](#)

Section D – The OregonBuys eProcurement System

The OregonBuys eProcurement System allows all CACFP sponsors access to state contracts to purchase products, goods, and services. When competitive procurement methods are conducted by the CACFP sponsors, this agreement may be one source of prices when using small purchase procedures, sealed bids, or competitive proposals, as applicable.

In order to search for active price agreements, search for blankets in the related category on [the OregonBuys website](#).

Reference: [USDA memo CACFP 03-2017](#)

Section E – Procurement Reviews

All program sponsors are required to be subjected to a procurement review of their non-profit food service account by ODE. State Agency oversight is needed to ensure program sponsors comply with the applicable procurement provisions. ODE will request and review Program sponsors procurement documentation to assess compliance, capture technical assistance, and establish findings, and required corrective action, as applicable.

ODE will conduct the procurement review using a step-by-step approach. From notifying each sponsor of a procurement review to closing the review, each step is intended to assess compliance while providing technical assistance in the area of procurement.

Overall, the State agency will:

- Notify sponsors of a procurement review
- Schedule the review
- Send sponsors the USDA Procurement Tool to complete and request a list of documentation needed to conduct the review
- Assess compliance by reviewing submitted documentation
- Report review results which may include technical assistance or findings of non-compliance
- Require corrective action, as applicable
- Review and approve the corrective action, as applicable
- Close the review

Examples of documents that will be required:

- Written Code of Conduct
- Documented Procurement Procedures
- SFA Procurement Table on the USDA Procurement Review Tool
- Vendor Paid List/Summary of Total Expenditures by Vendor Report: nonprofit food service account only)

Additional documents that may be requested to validate the procurement method used:

- Micro-purchases (only for vendors selected for review)
 - Purchase orders issued
 - Receipts/Invoices

- Small Purchase Procurements (only for vendor transactions selected for review)
 - Solicitation documents (specifications, evaluation criteria)
 - Bid Quotes/Responses
 - Evaluation of Responses for Award
 - Purchase orders
 - Receipts/Invoices
- Formal Procurements (only for vendor contracts selected)
 - Solicitation documents (solicitations, evaluations, contracts, etc.)
 - Bidder/Offeror responses
 - Evaluation of responses for contract award
 - Executed contracts Contract renewal/addendum/amendments, if applicable (since original contract was awarded)
 - Cost/price analysis documentation
 - Non-competitive proposal authorization, if applicable
 - Invoices (3 vendor invoices identifying goods/services procured and amount paid)

Section F – Vended Meals

Sponsors may contract with vendors to purchase meals and snacks. The decision to purchase meals from a vendor will depend on a variety of factors including each facility's availability of food service equipment, space, personnel, and budget. Meals may be purchased either in bulk or as pre-plated, individual meals. The contract may be for food preparation, only, or for preparation and delivery.

A sponsor which contracts with a food service management company (FSMC) must remain responsible for ensuring that the food service operation conforms to its agreement with the State agency. All procurements of meals from FSMCs must adhere to the procurement standards set forth in [7 CFR 226.22](#) and comply with the procedures identified in [7 CFR 226.21](#). The contract may be for food preparation only or for preparation and delivery. Sponsors who contract with a FSMC or provider of vended meals who is not a public or private nonprofit school must use the ODE standard contract as required by [7 CFR 226.6\(i\)](#). If any other form of contract is used, or if sponsors or FSMC's wish to add provisions to the standard contract, they must first gain ODE approval.

All bids totaling **the simplified acquisition threshold**, or more, shall be submitted to the State agency for approval before acceptance. All bids shall be submitted to the State agency for approval before accepting a bid which exceeds the lowest bid. State agencies shall respond to any request for approval within 10 working days of receipt. The institutions shall inform the State agency of the reason for selecting the food

service management company chosen. State agencies may require institutions to submit copies of all bids submitted under this section.

Agreement Type	Vendor Type	Service Offered	Procurement Type
Vended Meal Agreement	Various	Meals: bulk or unitized, may include delivery	Competitive: Formal or informal depending on contract value
Intergovernmental Agreement	School Food Authority	Meals: bulk or unitized, may include delivery	Non-competitive or competitive
Food Service Management Company (FSMC) Contract	FSMC	Various depending on contract terms such as: meals, staff, menus, program management	Competitive RFP: ODE CNP must preapprove RFP and contract.

Meals not prepared by the sponsor either on site (self-prep) or from the sponsor's central kitchen are considered meals from an outside source.

A vendor may be:

- A private non-profit organization
- A Local Education Agency (LEA), or any other public entity
- A catering company
- A Food Service Management Company (FSMC) acting as a food vendor only—see Food Service Management Companies in this chapter for specific requirements

Agreement Types

Intergovernmental Agreement

This type of Agreement is only allowed between a CACFP sponsor and a school food authority (SFA) in accordance with [7 CFR 226.17\(b\)\(7\)](#), [7 CFR 226.19\(b\)\(8\)](#), [7 CFR 226.19a\(b\)\(7\)](#), [2 CFR 200.318\(e\)](#) and [USDA memo 2005-07-27 "Procurement Questions- Child and Adult Care Food Program"](#).

When a sponsor receives food, meals, and/or staffing from a SFA an Intergovernmental Agreement may be used. When a Sponsor receives food, meals, and/or staffing from a SFA an Intergovernmental Agreement may be used.

If there is a SFA that is willing to be the vendor/contractor, the Agreement may be awarded by direct negotiation with the CACFP Sponsor without competition.

The sponsor will retain all documentation in their files for review. Agreements developed under this option do not have renewal years available; they are negotiated each year.

If a CACFP sponsor is receiving goods or services from another CACFP sponsor, they must conduct a competitive procurement in accordance with [USDA memo 2005-07-27 "Procurement Questions-Child and Adult Care Food Program"](#).

Reference: [7 CFR 226.17\(7\)](#), [7 CFR 226.19\(b\)\(8\)](#), [7 CFR 226.19a\(b\)\(7\)](#), [2 CFR 200.318\(e\)](#), [ORS 190.010](#), and [USDA memo Procurement Questions-Child and Adult Care Food Program \(CACFP\)](#)

Vended Meal Agreement

In a Vended Meal Agreement, a CACFP sponsor is receiving meals from another CACFP sponsor, a private non-profit organization, or a commercial entity. The vendor/contractor does not directly manage any aspect of actually serving the food. Instead, the vendor/contractor provides only pre-packaged, pre-plated meals or food only.

CACFP sponsor must properly procure vended meals in accordance with the appropriate procurement method outlined in [2 CFR 200.320](#) based on the contract value for the program period.

The sponsor will retain all documentation in their files for review. Agreements developed under an informal procurement method do not have the option of renewal years available; they are negotiated each year.

Agreements totaling the **simplified acquisition threshold**, or more, shall be submitted to the State agency for approval before acceptance. All bids shall be submitted to the State agency for approval before accepting a bid which exceeds the lowest bid.

Reference [USDA memo 2005-07-27 "Procurement Questions-Child and Adult Care Food Program \(CACFP\)](#), [2 CFR 200.320](#), and [USDA memo CACFP 07-2019"](#)

Contracted Meal Service Requirements and Limitations

The sponsor and the successful proposer must enter into formal agreement and use the required State agency standard Intergovernmental Agreement or *Vended Meal*

*Agreement form (located on CNPweb packet page) in accordance with [7 CFR 226.6\(i\)](#). For new sponsors, a draft copy of the *Vended Meal Agreement* will be sent to ODE CNP for approval before the Agreement is fully executed.*

Signing a *Vended Meal Agreement* with a vendor does not relieve the sponsor of its CACFP responsibilities of managing, monitoring, filing reimbursement claims and record keeping, including compliance with meal patterns, portion sizes and maintaining the quality of the food service.

Food Service Management Company Agreement

The [Food Service Management Company \(FSMC\)](#) provides services for sponsors such as serving, producing, and supplying prepared foods. A FSMC is considered a vendor in CACFP Federal regulations.

FSMC services will require a competitive procurement and resulting agreement in accordance with procurement standards outlined in [7 CFR 226.22](#), [7 CFR 226.21](#), [2 CFR 200 subpart D](#), and [USDA memo CACFP 07-2019](#).

Sponsors are required to use the State agency standard fixed price per meal Request for Proposal (RFP) format to procure a FSMC in accordance with [7 CFR 226.6\(i\)](#). The RFP format allows the sponsor to award an agreement based on a combination of lowest price and how well the proposals meet the evaluation criteria established by the sponsor. Sponsors will need to submit a draft copy of their Request(s) for Proposal to ODE CNP for review before soliciting vendor proposals.

When a school district is a Local Education Authority and a CACFP sponsor and the district wants to contract with a FSMC for its food services, it must use an ODE CNP prototype Request for Proposal (RFP) in accordance with [7 CFR 210.19\(5\)](#) and contract in accordance with [7 CFR 210.16](#) and [7 CFR 226.21](#). The LEA-FSMC contract must be submitted to ODE CNP for approval *before* it can be signed by the parties.

The FSMC can do the following under CACFP regulations:

- Sell meals to a CACFP sponsor
- Develop menus for the sponsor's approval
- Provide required records associated with the production of food, such as:
 - Menus
 - Production records
 - Recipes
 - CN Labels
 - Product Formulation Sheets (PFS)
 - Standard of Identity labels
 - Product specifications

- Provide Daily Vendor Receipts
- Assist the sponsor staff coordinator, or co-coordinators, with staff training, but cannot serve as sole trainer

Reference: [7 CFR 226.21](#)

Sponsors that contract with a FSMC *must* do the following:

- Assign a sponsor staff coordinator or co-coordinators with authority to manage the CACFP
- Assure overall compliance with all CACFP regulations
- Approve Confidential Income Statements and develop the CACFP One Month Enrollment Roster (OMER) for each participating site for which an OMER must be developed (see exception above for School Districts operating CACFP at sponsored sites)
- Submit all claims for reimbursement
- Monitor sites if a multi-site sponsor (see [Chapter 14 Multi-Site Sponsors](#)), correct problems found through site monitoring or record reviews
- Train staff with CACFP duties (see exception above for School Districts operating CACFP at sponsored sites)
- Attend/participate in ODE CNP annual training. Targeted annual training for school districts will be combined with NSLP trainings
- Maintain control of the quality of the food service including approval of all menus
- Maintain all required CACFP records
- Maintain documentation of actual menus served and documentation demonstrating CACFP menu compliance such as (these records may be on file with the FSMC at the FSMC's office at a sponsor's site):
 - Menu
 - Recipe
 - Menu production records
 - CN labels
 - Product Formulation Sheets (PFS)
 - Standard of Identity product labels
 - Daily Vendor Receipts
 - Validate and submit reimbursement claims
 - Review Daily Vendor Receipts and communicate with the FSMC
 - Maintain invoices from the FSMC for CACFP meals purchased
 - Complete annual ODE CNP renewal application

Reference [7 CFR 226.21](#)

School District Sponsors only:

SFAs that contract with FSMCs for some or all aspects of the management of the food service program may allow the FSMC to conduct the same activities for all CACFP programs that are performed for NSLP.

Reference [USDA memo CACFP 04-2013](#)

Sponsor and Vendor Responsibilities

Sponsors and vendors/contractors have specific responsibilities when entering into an Intergovernmental Agreement, a *Vended Meal Agreement* or a FSMC Contract.

Sponsor Responsibilities:

- Review all menus prior to ordering to assure compliance with all Program requirements
- Receive copies of recipes, CN Label documentation, Standard of Identity labels (copies or originals) and Manufacturer's Product Formulation Sheets (PFS) for combination foods on menus and review for creditability before meals are delivered or served. This documentation must be on file with the sponsor prior to receiving and serving vended meals.
- Work with the vendor/contractor to adjust menus as necessary to meet Program requirements
- Receive and retain all Daily Vendor/Contractor Receipts
- Ensure sponsor and vendor/contractor representatives sign and date Daily Vendor/Contractor Receipts
- Examine meals as delivered for acceptability; document any discrepancies with food items or number of meals received at the time of receipt on the Daily Vendor/Contractor Receipt.
- Keep documentation of delivery times and temperatures of foods as meals are delivered
- Work with vendor/contractor to rectify any problems with service, food quality, frequent substitutions, or inadequate meals
- Pay vendor/contractor billing invoices as agreed upon in the Intergovernmental Agreement, Annual Vended Meal Agreement or FSMC Contract.

Vendor Responsibilities:

- Work with the sponsor to plan meals meeting all CACFP requirements

- Provide copies of recipes, CN Labels documentation, Standard of Identity labels (copies or originals) and manufacturer's Product Formulation Statements (PFS) for combination foods for review prior to the delivery of meals
- Provide wholesome foods
- Deliver meals on time and as agreed in the *Annual Vended Meal Agreement*
- Sign and date Daily Vendor Receipts at the time of delivery
- Keep delivery records showing time and temperatures of foods delivered
- Work with the sponsor to make adjustments to menus and service, as needed
- Send billing invoices as agreed upon in the *Annual Vended Meal Agreement* or LEA-FSMC Contract.

Menus & Menu Records

The sponsor is responsible for making sure all purchased meals and snacks are reimbursable. The sponsor must review and approve menus submitted by the vendor/contractor. A sponsor staff person who is knowledgeable of CACFP meal pattern, menu documentation and portion size requirements should review the menus for compliance with program requirements. See [Chapter 9 Meal Pattern Requirements](#) for more information.

The sponsor is responsible for obtaining all required menu documentation from the vendor/contractor to support reimbursable meals prior to receiving and serving vended meals. This documentation is to be maintained on file by the sponsor. See [Chapter 10 Meal Service and Menu Records](#) for more information.

When planned meals do not meet all Program requirements the sponsor staff person should consult with the vendor to modify the menu.

Daily Vendor Receipts

Daily Vendor Receipts (located on the [CACFP Meal Pattern Page](#)) are necessary to document that food delivered from the vendor is consistent with the provisions of the Annual Vended Meal Agreement (or Intergovernmental Agreement IGA). Federal regulations specify that payment cannot be made for meals that:

- Do not meet meal pattern requirements
- Food that is spoiled or unwholesome at time of delivery

Daily Vendor Receipts provide documentation for this requirement. Daily Vendor Receipts must include:

- Date of delivery
- List all food delivered in item count, weight, or volume amount
- Provide instructions for portion sizes and serving details

- Document accurate food delivery time and temperatures
- Be signed and dated on delivery by the Vendor representative
- Be signed and dated on delivery by the Sponsor representative
- Verify consistency with provisions of the LEA-FSMC contract, if applicable

Sponsors may use the ODE CNP *Daily Vendor Receipt* or develop their own daily vendor receipt. The sponsor must maintain all Daily Vendor Receipts with other CACFP records.

Monitoring Delivered Meals

Trained sponsor staff should receive the food to verify the information on the *Daily Vendor Receipt* is accurate, determine if substitutions have been made and are acceptable, and to document and report any problems.

Sponsor officials must routinely monitor meals provided by vendors. Multi-site sponsors must do this as a part of their required site monitoring visits. Single-site sponsors should document regular monitoring of vended meals. ODE CNP recommends the following checklist be used by all Sponsors receiving vended meals:

- ☐ Does the approved menu represent the meals actually delivered?
- ☐ Are all required meal pattern components included?
- ☐ Are there frequent substitutions to the approved menus? If so, is the variety and acceptability of the menu maintained?
- ☐ Do all meals for the current month meet CACFP requirements?
- ☐ If meals are delivered, are meals or meal components counted at delivery, and any discrepancies recorded on the Daily Vendor Receipt or menu record?
- ☐ Are Daily Vendor Receipts maintained on file with the Sponsor?
- ☐ Are meals delivered at the agreed upon time?
- ☐ Are foods delivered and held at the required temperatures?
- ☐ Do all combination food items have a recipe, CN label documentation, Standard of Identity label or PFS on file documenting creditable food components?
- ☐ Does the quality of food meet the specifications described in the FSMC contract or Annual Vended Meal Agreement?

Back-Up System

The sponsor must have a backup system in place in the event the vendor does not provide sufficient amounts of food or milk for all the participants present or is unable to make a scheduled delivery due to unforeseen circumstances. A back-up system must be evident to ODE CNP during an administrative review.

Vendor/Contractor Records

The vendor/contractor must agree to maintain all records (invoices, receipts, recipes, original CN labels, Standard of Identity labels, PFS, etc.) that are necessary to meet CACFP record keeping requirements. Records must be available to ODE CNP during administrative reviews or upon request.

To demonstrate the CACFP meal pattern requirements are being met, the vendor/contractor must:

- Provide Daily Vendor Receipts
- Provide menus on a monthly, weekly or daily basis
- Provide recipes; CN label documentation; Standard of Identity labels; and, PFS to the sponsor
- Demonstrate that state and local health and sanitation requirements are met at their food production facilities at all times.

The sponsor may take action against the vendor/contractor for meals that do not meet CACFP meal pattern requirements, are spoiled or unwholesome or otherwise do not meet the terms and conditions of the Annual Vended Meal Agreement.

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Section A - General Requirements for Reimbursable Meals

What is a Reimbursable Meal?

A **Reimbursable Meal** for CACFP is a meal or snack that meets all the requirements of CACFP and may be reimbursed at the current rate based on meal and program type (See [Chapter 6: Meal Reimbursement Claims](#) for more details). Requirements of reimbursement include:

- Claiming for a maximum of either two meals and one snack or two snacks and one meal per participant per day
- Serving at an ODE CNP approved site
- Serving an ODE CNP approved meal or snack type*
- Serving at an ODE CNP approved meal time
- Serving to an enrolled participant (when applicable)
- Meeting all meal pattern, meal service and menu documentation requirements (See [Chapter 11 Meal Service and Menu Records](#))

Reimbursable Meal Types*

Sponsors can only claim reimbursement for meal types approved by ODE CNP. The following meal types are eligible for reimbursement:

Breakfast
Morning (AM) Snack
Lunch
Afternoon (PM) Snack
Supper
Evening Snack

Sponsors can claim up to 2 meals and 1 snack or 2 snacks and 1 meal per participant per day ([7 CFR 226.17\(b\)\(3\)](#)).

ODE CNP approves meal sites, types, and times through the online application system, CNPweb.

Meal Times

Meals that are claimed for reimbursement should be served at traditional meal times. ODE CNP defines traditional meal times within the ranges indicated below:

- Breakfast should begin before 9:00 AM
- Lunch: 11:00 AM – 1:30 PM
- Supper: 5:00 PM – 7:00 PM
- Snacks: Snacks should be timed between regularly scheduled meals to allow hunger to develop before the snack and again before the next scheduled meal service.

Different program types may have specific program requirements. CCLD Certified Centers must ensure that they are adhering to licensing requirements for meal times per the [Rules for Certified Child Care Centers](#): 414-305-1110. Program-specific meal time requirements can also be found in Chapters 16 through 21.

Sponsors may request non-traditional meal times by entering the time on the *CNPweb Site Information Sheet* prior to making the change. All meal times must be approved by ODE CNP prior to operations.

Section B - Meal Patterns

The CACFP meal patterns are federally mandated through [7 CFR 226.20](#). The requirements are set to meet standards laid out in the [Dietary Guidelines for Americans](#). The goal of CACFP is to improve the health and nutrition of infants, children, and adults served through the program.

Age Groups

There are three meal patterns for the three major life stages that CACFP serves:

- Infant: 0 - 11 months
- Child: 1 - 18 years old
- Adult: 18 years and older (typically serves older adults in Adult Day Cares)

The infant and adult meal pattern have different age-related requirements and portion sizes. For more information on these meal patterns, check out [Chapter 11 Infant Meal Pattern](#) requirements and [Chapter 21 Adult Day Care](#) requirements.

The Child Meal Pattern is further divided into four age groups:

- 1 - 2 years
- 3 - 5 years
- 6 - 12 years
- 13 - 18 years

The different age groups in the child meal pattern have different minimum required portion sizes for each of the meal pattern component (see [Child Meal Pattern Chart](#)). Listed portion sizes are minimum amounts required and sponsors are encouraged to prepare enough food to accommodate participants who require larger portions and additional servings.

The fully accessible version of this chart is available on the [CACFP Meal Pattern Page](#)



Child and Adult Care Food Program (CACFP)

Child (Ages 1-18) Meal Pattern

Breakfast¹: Serve all 3 components for a reimbursable Breakfast²

Food Components and Food Items	Ages 1-2	Ages 3-5	Ages 6-12	Ages 13-18 ³
Fluid Milk ⁴	4 fl oz (½ cup)	6 fl oz (¾ cup)	8 fl oz (1 cup)	8 fl oz (1 cup)
Vegetables, Fruits, or portions of both ⁵	¼ cup	½ cup	½ cup	½ cup
Grains ⁶ (oz. eq.) ⁷	½ oz. eq.	½ oz. eq.	1 oz. eq.	1 oz. eq.
Bread, Biscuit, or Roll	14 grams	14 grams	28 grams	28 grams
Waffle, Pancake, Croissant	17 grams	17 grams	34 grams	34 grams
Oatmeal and other cooked cereal grains ⁸	¼ cup cooked	¼ cup cooked	½ cup cooked	½ cup cooked
Cereal, Ready-to-Eat Flakes or Rounds ⁹	½ cup	½ cup	1 cup	1 cup
Cereal, Ready-to-Eat Granola ⁹	½ cup	½ cup	¼ cup	¼ cup
Cereal, Ready-to-eat Puffed ⁹	¾ cup	¾ cup	1 ¼ cup	1 ¼ cup

Snack¹: Select 2 of the 5 components for a reimbursable snack⁹

Food Components and Food Items	Ages 1-2	Ages 3-5	Ages 6-12	Ages 13-18 ³
Fluid Milk ⁴	4 fl oz (½ cup)	4 fl oz (½ cup)	8 fl oz (1 cup)	8 fl oz (1 cup)
Meat or Meat Alternate (M/MA) (oz. eq.) ⁷	½ oz. eq.	½ oz. eq.	1 oz. eq.	1 oz. eq.
Cheese	½ oz.	½ oz.	1 oz.	1 oz.
Peanut butter or other nut/seed butters	1 Tbsp.	1 Tbsp.	2 Tbsp.	2 Tbsp.
Yogurt (including soy yogurt) ¹⁰	2 oz. (¼ cup)	2 oz. (¼ cup)	4 oz. (½ cup)	4 oz. (½ cup)
Vegetables ⁵	½ cup	½ cup	¾ cup	¾ cup
Fruits ⁵	½ cup	½ cup	¾ cup	¾ cup
Grains ⁶ (oz. eq.) ⁷	½ oz. eq.	½ oz. eq.	1 oz. eq.	1 oz. eq.
Bread, Biscuit, or Roll	14 grams	14 grams	28 grams	28 grams
Cracker, Graham (about 5" by 2½")	14 grams/ 1 cracker	14 grams/ 1 cracker	28 grams/ 2 crackers	28 grams/ 2 crackers
Crackers (various)	11 grams	11 grams	22 grams	22 grams

Lunch or Supper¹: Serve all 5 components for a reimbursable Lunch or Supper¹¹

Food Components and Food Items	Ages 1-2	Ages 3-5	Ages 6-12	Ages 13-18 ³
Fluid Milk ⁴	4 fl oz (½ cup)	6 fl oz (¾ cup)	8 fl oz (1 cup)	8 fl oz (1 cup)
Meat or Meat Alternate (M/MA) (oz. eq.) ⁷	1 oz. eq.	1 ½ oz. eq.	2 oz. eq.	2 oz. eq.
Lean meat, poultry, or fish	1 oz. eq.	1 ½ oz. eq.	2 oz. eq.	2 oz. eq.
Tofu ¹²	2.2 oz. or ¼ c	3.3 oz. or ¾ c	4.4 oz. or ½ c	4.4 oz. or ½ c
Cheese	1 oz.	1 ½ oz.	2 oz.	2 oz.
Large egg	½ egg	¾ egg	1 egg	1 egg
Cooked dry beans/peas	¼ cup	¾ cup	½ cup	½ cup
Peanut butter or other nut/seed butters	2 Tbsp.	3 Tbsp.	4 Tbsp.	4 Tbsp.
Peanuts, soy nuts, tree nuts, or seeds	1 oz.	1 ½ oz.	2 oz.	2 oz.
Vegetables ^{5, 13, 14}	½ cup	¾ cup	½ cup	½ cup
Fruits ⁵	½ cup	¾ cup	½ cup	½ cup
Grains ⁶ (oz. eq.) ⁷	½ oz. eq.	½ oz. eq.	1 oz. eq.	1 oz. eq.
Bread, Biscuit, or Roll	14 grams	14 grams	28 grams	28 grams
Pasta, Rice, or Grits	14 grams dry/ ¼ cup cooked	14 grams dry/ ¼ cup cooked	28 grams dry/ ½ cup cooked	28 grams dry/ ½ cup cooked
Tortilla, Soft, Flour or Corn	14 grams	14 grams	28 grams	28 grams

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CACFP Meals for Children 1-18 Years

- ¹ Water must be offered to children throughout the day. Water is not part of a reimbursable meal and may not be served instead of fluid milk.
- ² All three components must be served for a reimbursable breakfast. Meat and Meat Alternates (MMA) may be used to meet the entire grains component requirement a maximum of three times a week at breakfast. One ounce equivalent of MMA is equal to one ounce equivalent of Grains. [Offer Versus Serve](#) is an option only for At-Risk Afterschool Sponsors.
- ³ Larger portion sizes than specified may need to be served to children ages 13 through 18 years old to meet their nutritional needs.
- ⁴ [Milk type served](#) must be unflavored whole milk for children one year of age (12-23 months). Milk must be unflavored low-fat (1%) or unflavored fat-free (skim) for children 2-5 years of age. Milk must be unflavored or flavored low-fat (1%) or fat-free (skim) milk for children 6 years old and older.
- ⁵ Pasteurized 100% juice may only be used to meet the vegetable or fruit requirement once per day.
- ⁶ At least one serving of grains per day must be whole-grain rich across all meals and snacks served at each site. [Grain-based desserts](#) and refined grains do not count towards meeting the Grains component requirement.
- ⁷ Ounce equivalent serving sizes are used to determine serving sizes in the Grains and Meat/Meat Alternate components. See [CACFP Grains Ounce Equivalent Resources](#) for more information on crediting Grains. Refer to the [Food Buying Guide](#) for Meat/Meat Alternate ounce equivalent yields.
- ⁸ Breakfast cereals must be whole grain-rich, fortified, or enriched, and contain no more than 6 grams of added sugar per dry ounce (no more than 21 grams Added Sugars per 100 grams of dry cereal). Refer to the [Breakfast Cereal Sugar Limit Wallet Card](#) and the WIC Cereal List.
- ⁹ Only one of the two required components for snack may be a beverage. Offer versus serve is not an option for snack.
- ¹⁰ Yogurt must contain no more than 12 grams of added sugars per 6 ounces. Refer to the [Yogurt Sugar Limit Wallet Card](#).
- ¹¹ All five components must be served for a reimbursable lunch and/or supper. [Offer Versus Serve](#) is an option only for At-Risk Afterschool Sponsors.
- ¹² Tofu must contain at least 5 grams of protein for every 2.2 oz (¼ cup) serving.
- ¹³ Lunch and supper must include one Fruit and one Vegetable OR two Vegetables. When two Vegetables are served, two different kinds of vegetables must be served.
- ¹⁴ Leafy greens, such as lettuce or spinach, only credit for half of the volume served. ½ cup of spinach will credit for ¼ cup of Vegetables.

Abbreviations:

Fl oz = Fluid Ounces (volume)
Cup, c = Measuring cup (8 ounces)
Oz. eq. = Ounce Equivalent
Oz. = Ounce (weight)
Tbsp. = Tablespoon
Grams, g = Grams (weight)

Additional Resources:

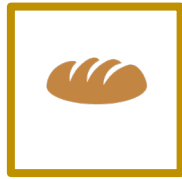
[ODE CNP CACFP Meal Pattern and Menu Planning Page](#)
[Crediting Handbook for the CACFP \(USDA\)](#)
[The Food Buying Guide \(USDA\)](#)
[Nutrition Standards for CACFP Meals and Snacks \(USDA\)](#)

Meal Components

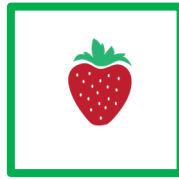
The CACFP meal pattern is made up of five meal components:



Fluid Milk



Grain



Fruit



Vegetable



Meat/Meat Alternate
(M/MA)

The components required are dependent on the **meal type** (meal or snack) that is served.

Breakfast: Must serve all three components for a reimbursable meal.



Fluid Milk



Grain*



Vegetable/
Fruit

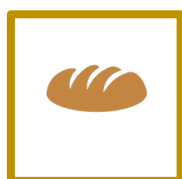
*The Grain component may be substituted with a Meat/Meat Alternate (M/MA) component up to three times a week for breakfast. 1 ounce M/MA = 1 ounce grains.

The vegetable and fruit components are combined for breakfast and sponsors may serve a fruit, a vegetable, or a combination of fruit and vegetables to meet this component requirement.

Lunch or Supper: Must serve all five components for a reimbursable meal.



Fluid Milk



Grain



Fruit



Vegetable

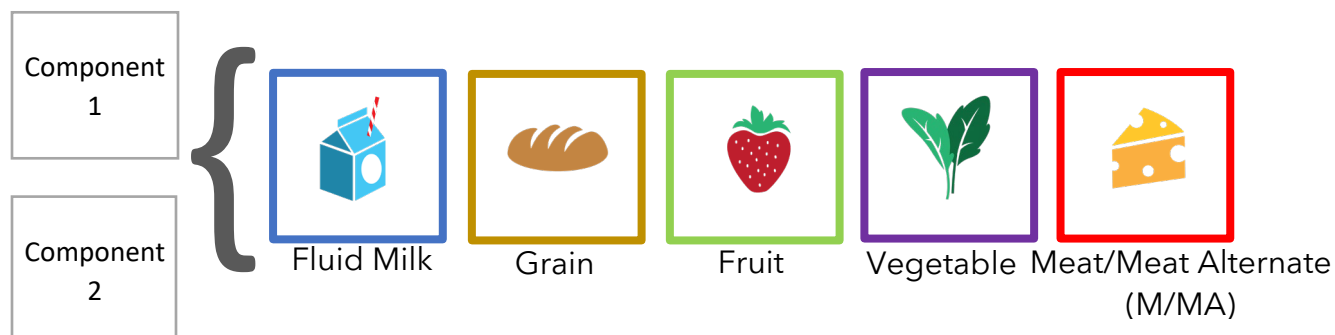


Meat/Meat Alternate
(M/MA)

Lunch and supper must include one fruit and one vegetable OR two vegetables. When two vegetables are served, two different kinds of vegetables must be served.

Snack: Must serve two of the five components for a reimbursable snack.

Serve two components from the following five components



Snacks must be from **two different components**. Snacks with two food items from the same component (for example, pretzels and graham crackers only) are NOT reimbursable.

Only one of the two required components for a snack may be a beverage.

Meal Components and Meal Service

There are optional meal service styles for some programs which may allow participants to decline some of the foods offered in a reimbursable breakfast, lunch, or supper. This includes the Family Style meal service style and Offer Versus Serve meal service style. More information about meal service styles can be found in [Chapter 10 Meal Service and Menu Records](#).

Section C - Crediting Meal Components

Each CACFP meal component has specific requirements required to meet nutrition standards. Some foods are **creditable** towards the CACFP meal component, meaning that they may be counted toward meeting meal pattern requirements for a reimbursable meal. Other foods are **non-creditable** and do not meet any meal pattern component requirement. In general, foods that are creditable towards the CACFP meal component are aligned with the nutritional goals set in the current [Dietary Guidelines for Americans](#).

Meal component crediting is determined by USDA Food and Nutrition Services (FNS) and the primary source of food crediting information is available through the [Food Buying Guide](#). This interactive web-based tool includes a database of food items,

their crediting information, and an assortment of tools that help sponsors develop recipes and menus for all Child Nutrition Programs.

The [CACFP Crediting Handbook](#) is a companion resource to the Food Buying Guide specifically for CACFP sponsors. The CACFP Crediting Handbook provides detailed explanations on CACFP crediting, including definitions, guidelines for crediting, and crediting tables for common food items.

This section provides a streamlined version of information from the Food Buying Guide, the CACFP Crediting Handbook, and the memos and guidance provided by the USDA FNS (see the FNS website on [Nutrition Standards for CACFP Meals and Snacks](#) for links to current CACFP meal pattern resources).

ODE CNP also has Oregon-specific CACFP Meal Pattern guidance available on the [CACFP Meal Pattern and Menu Planning Page](#). This page includes downloadable meal pattern charts, ODE-developed handouts, and links to other CACFP resources, including USDA FNS resources.

Crediting Grains

CACFP Grain Component Requirements

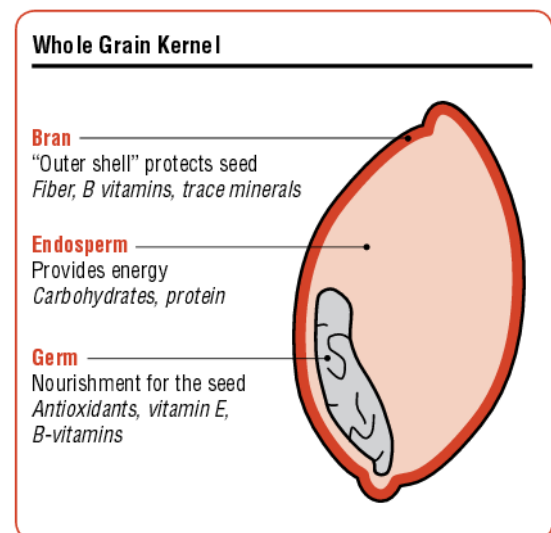
Grains are a required component for breakfast, lunch, and supper and are an optional component at snack. For breakfast, grains can be substituted for a meat/meat alternate (M/MA) up to three times a week.

- **All grains served must be creditable.**
- **At least once per day, the grain component must be whole grain-rich.**

What is a Creditable Grain?

A creditable grain is one that is made with enriched or whole grain meal and flour. This includes grain items made with:

1. **Whole Grains:** A grain consisting of the whole kernel or seed, with all three parts of the grain, the bran, the germ, and the endosperm, intact.
2. **Enriched and Fortified Grains:** Grains that have been processed to remove all or part of the bran and the germ but have nutrients added back.



3. **Bran and Germ:** The bran is the seed husk or outer coating and is a good source of many nutrients. The germ is the vitamin-rich part of the grain kernel in the middle of the grain.

Common Whole Grain Ingredients

Amaranth	Hominy	Sprouted
Brown rice	Millet	whole-
Buckwheat	Oatmeal/oats	grains
Bulgur	Popcorn	Whole
Corn masa	Quinoa	wheat flour
Cracked	Rye berries	Wild rice
wheat	Teff	Any grain
Dehulled	Wheat berries	ingredients
barley	Whole corn	with
Flaked rye	Sorghum	"whole" in
Graham flour	Spelt berries	front of it.

Common Enriched Grain Ingredients

Any grains with the word "enriched" in front of it, i.e., enriched rice flour, enriched corn flour, enriched durum flour, enriched wheat flour.

Any grain that includes the nutrients used to enrich the flour in a parenthesis after it, i.e., Durum flour (niacin, iron, riboflavin, folic acid, thiamin).

This is not a comprehensive list of all whole and enriched grains available. Sponsors with questions about the creditability of a specific grain should reach out to their assigned Child Nutrition Specialist.

Identifying Creditable Grains

There are many creditable grain products available. However, sponsors must check that all grain products are creditable before serving. Serving non-creditable grains as part of the grains component will result in a non-reimbursable meal.

To check if your grain product is creditable, make sure the item is not a **grain-based dessert** (see section on Non-Creditable Grains) and meets one of the following criteria:

- The grain product is labeled as whole grain or enriched.
- The first grain on the ingredient list is labeled as whole grain, enriched, bran, or germ
- The manufacturer's product label or **product formulation statement (PFS)** states that the primary grain ingredient is a whole grain or includes a creditable grain.
- If the item is a **breakfast cereal**, it is enriched, whole grain, or fortified with vitamins and minerals and meets **sugar limit requirements**

For additional resources on creditable grains, check out ODE CNP's [Creditable and Whole Grain-Rich Grains Flowchart](#) and the USDA FNS [Crediting Grains in the Child Nutrition Programs Tip Sheet](#).

What is a Whole Grain-Rich (WGR) Grain?

A whole grain-rich (WGR) grain item is an item where the grain content of the product is between **50** to **100** percent whole grain and all remaining grains are enriched.

Whole grain-rich is different from the term 'whole grains,' because an item does not need to be made of 100% whole grains to be whole grain-rich and items simply labeled as including 'whole grains' may not consist of at least 50% whole grains in the product.

At least one serving of grains per day must be whole grain-rich. This applies to the child and adult meal patterns only. This means that sponsors who serve only one meal or a snack a day through CACFP must serve a whole grain-rich item if they are required to offer a grain component at that meal type served. Sponsors who serve multiple meals and snacks can choose which meal or snack to offer the whole grain-rich item. All other grain items served only needs to be creditable (see image below). It is **best practice** to serve only whole grain-rich items for the grain component.



Creditable & WGR
Breakfast



Creditable
Lunch



Creditable
PM Snack

Quick Tip! 100% Whole Wheat Bread is a common, cost-effective WGR product

Identifying Whole Grain-Rich (WGR) Grains

Oregon CACFP sponsors must identify the whole grain-rich items that are served to participants and supporting documentation must be saved (see [Chapter 10 Meal Service and Menu Documentation](#)).

There are six different ways to verify a grain item as whole grain-rich. Sponsors only need to verify that an item is whole grain-rich through one method. See below for a summary of the six different methods.

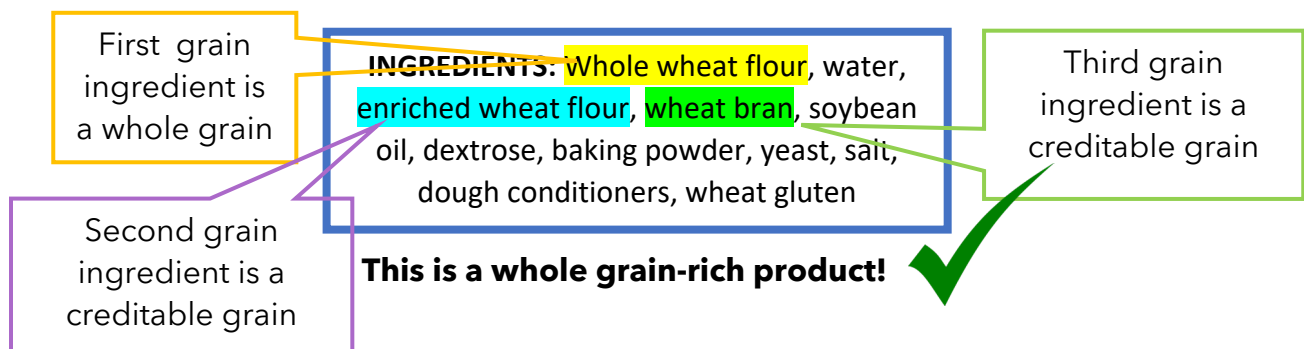
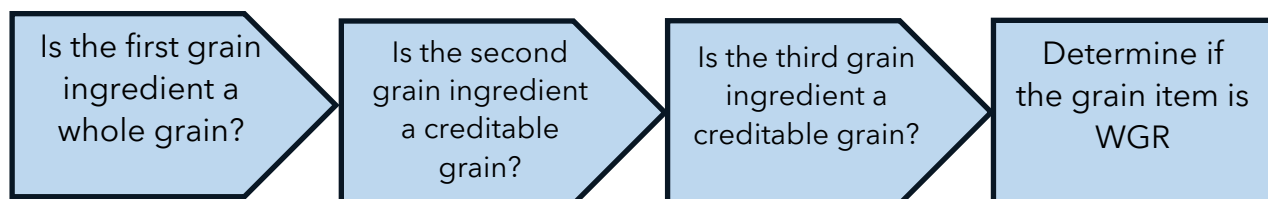
Six Methods of Identifying Whole Grain-Rich Grains

- 1** The product is found on any State Agency's Women, Infants, and Children (WIC)-approved 'Whole Grain' food list or is a WIC cereal with a "W" on the WIC Cereal list
- 2** The product is labeled "whole wheat" and has a FDA Standard of Identity
- 3** The product includes one of the FDA approved whole-grain health claims on its packaging
- 4** The food item meets the whole grain-rich criteria under the National School Lunch Program
- 5** The product has proper documentation from a manufacturer or a standardized recipe showing the whole grains are the primary grains
- 6** The food item meets the *Rule of Three* (ingredient label method)

The Rule of Three or the Ingredient Label Method

The most common way to do this is to review the Ingredient List on the food packaging. This is also known as the Rule of Three or the ingredient label method (Method #6 above).

The **Rule of Three** looks at the first three grain ingredients on the ingredient list only. The first grain ingredient must be a whole grain and the second and third grain ingredients, if there are any, must be either a whole grain, enriched grain, bran, or germ (creditable grain).



Common Non-Creditable Grains

Barley malt	Nut or seed flour
Bromated flour	Oat fiber
Chickpea flour	Rice flour
Corn, corn flour	Semolina
Corn fiber	Tapioca flour
Durum flour	Vegetable flour
Farina	Wheat flour
Grits	
Malted barley flour	

When using the Rule of Three, ingredients may be disregarded, or not considered, if they make up less than 2% of the product weight or are **grain derivatives**, such as wheat gluten, wheat starch, corn starch, corn dextrin, rice starch, tapioca starch, or modified food starch.

If the first ingredient is not a whole grain or if the second or third ingredients are **non-creditable grains**, the product would not meet the whole grain-rich criteria and must not be used to meet the once per day whole grain-rich requirement.

Other Methods of Identifying Whole Grain-Rich Grains

Sponsors who purchase primarily from grocery stores and other vendors who serve the general public are also encouraged to identify whole grain-rich items that are on the **WIC Food List** (Method #1).

The grain products on the WIC Whole Grain Food List will meet CACFP whole grain-rich standards. Breakfast cereals that are marked as made with whole grains will also meet CACFP whole grain-rich standards. The [Oregon WIC Food List](#) page includes the most current list. ODE also has a simplified [WIC Whole Grains List](#) and [WIC Cereals list](#).

Additional methods of identifying whole grain-rich grains include looking for:

- Bread and pasta products with an FDA Standard of Identity and labeled “whole wheat”
- Products with an FDA approved whole-grain health claim on its packaging
- Food items that meet the whole grain-rich criteria under the National School Lunch Program (NSLP)
- Products with a product formulation statement or a standardized recipe that shows the whole grains are the primary grains by weight and all additional grains are creditable

FDA Standards of Identify: Breads & Pastas

- Whole wheat bread
- Entire wheat bread
- Graham bread
- Whole wheat rolls
- Entire wheat rolls
- Graham rolls
- Whole wheat buns
- Entire wheat buns
- Graham buns
- Whole wheat macaroni product
- Whole wheat macaroni
- Whole wheat spaghetti
- Whole wheat vermicelli

FDA Whole Grain Health Claims:

Statements must be listed exactly

"Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers."

OR

"Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease."

For additional resources on whole grain-rich grains, check out ODE's [Creditable and Whole Grain-Rich Grains Flowchart](#), the USDA FNS Handouts on [How to Spot Whole Grain-Rich Foods for the CACFP](#), [Identifying Whole Grain-Rich Foods for the CACFP Using the Ingredient List](#), [Using the WIC Food Lists to Identify Grains for the CACFP](#), and [Is My Recipe Whole Grain-Rich in the CACFP](#).

Non-Creditable Grains

Non-creditable grains are grain products and ingredients that do not count towards the grain component due to their lower nutritional quality. Sponsors serving a non-creditable grain for the grain component will result in a non-reimbursable meal or snack.

Sponsors are allowed to serve non-creditable grains as a **bonus food** item. For example, a sponsor may serve a birthday cake, which is non-creditable as a grain-based dessert, as an extra item for lunch, but cannot serve the birthday cake for the grain component at lunch if the meals will be claimed. Bonus food items are not considered allowable expenses for CACFP and must be paid with other funding sources (see [Chapter 7 Financial Management of the CACFP](#)).

See the list of [common non-creditable grain ingredients](#). Other non-creditable grain products include **refined grain** products that are not enriched, many alternative flours and pastas, **grain-based desserts**, and breakfast cereals that exceed the sugar limit threshold.

Crediting Breakfast Cereals

Breakfast cereals include ready-to-eat cereals, instant, and hot cereals. In order for a breakfast cereal to be **creditable**, it will need to meet two requirements:

1. The cereal is **enriched, whole grain, or fortified with vitamins and minerals.**
2. It meets the **sugar limit requirements:** As of October 1, 2025, all cereals must contain **no more than 6 grams of added sugar per dry ounce.**

Determining whether a breakfast cereal meets sugar limit requirements:

There are several methods that can be used.

1. **Choose a WIC-approved cereal:** The sugar limit requirement for CACFP matches with WIC requirements for cereals. All cereals on any WIC-approved food lists will meet the sugar limit threshold. The [Oregon WIC Food List](#) page includes the most current list. ODE also has a simplified [WIC Cereals List](#) with whole grain-rich and serving size guidelines.
2. **Use the [CACFP Added Sugar Limits Wallet Card](#):** This table, shown below, includes the sugar limit for different serving sizes. Simply check the Nutrition Facts Label on the cereal packaging, check the serving size and the Added Sugar and compare to the table. Check out the [How to Use the CACFP Added Sugar Limits Wallet Card Handout](#) for step-by-step instructions.
3. **Calculating by hand:** If your serving size isn't listed or you want to try and calculate out the sugar per dry ounce yourself, check out the Team Nutrition Handout: [Calculating Sugar Limits for Breakfast Cereals in the CACFP](#) for step-by-step instructions.

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CACFP Sugar Limits IN CEREAL

Threshold:

No more than 6 grams
added sugar per dry oz.
(dry ounce = 28.35 grams)

Sugars (g) = 6 <=

Serving Size (g) = 28.35 **0.212**

*Cereals must be whole grain,
enriched, or fortified*

SERVING SIZE

ADDED SUGARS

If the serving size is:	Sugars no more than:
0-2 grams	0 grams
3-7 grams	1 gram
8-11 grams	2 grams
12-16 grams	3 grams
17-21 grams	4 grams
22-25 grams	5 grams
26-30 grams	6 grams
31-35 grams	7 grams
36-40 grams	8 grams
41-44 grams	9 grams
45-49 grams	10 grams

SERVING SIZE

ADDED SUGARS

If the serving size is:	Sugars no more than:
50-54 grams	11 grams
55-58 grams	12 grams
59-63 grams	13 grams
64-68 grams	14 grams
69-73 grams	15 grams
74-77 grams	16 grams
78-82 grams	17 grams
83-87 grams	18 grams
88-91 grams	19 grams
92-96 grams	20 grams
97-100 grams	21 grams

Quick Tip! The shape of a cereal, also known as **cereal type**, determines the minimum required portion size – check out the ODE [WIC Cereals List](#) for more information



Refined grain products include items such as non-enriched white rice, refined wheat flour, pastas, and corn meal. These grains have been milled and processed to remove key nutrients, including the bran and the germ. Sponsors must check ingredient labels to ensure that refined grain products are not served. The most common refined grain products include white rice, pasta, and tortillas and tortilla chips.

Alternative flours and products are part of a growing category of products that are commonly found in gluten-free products or other diet-specific foods. These are often made of non-grain products and would not credit towards the grain component. This includes all bean, nut, and vegetable flours, including common products such as almond flour, chickpea flour, tapioca flour, soy flour, and red lentil flour. Products such as cauliflower rice would also fall under this non-creditable category. Some of the products may be creditable for the vegetable or meat component (see sections on [Crediting Meat/Meat Alternates](#) and [Crediting Vegetables and Fruits](#)).

Alternative flours and ingredients may be found in mixed dishes or flour blends. Review the ingredient list. If the alternative flour is the first ingredient, the product will not be creditable for the grain component. If the alternative flour is found in large quantities (second or third ingredient), a product formulation statement will be needed (see section on [Crediting Combination Foods](#)). If the alternative flour is found in small quantities (past the first three ingredients), the product may still be creditable.

Grain-Based Desserts are items commonly considered to be desserts. These items are non-creditable since they are a source of added sugars and saturated fats. Although healthier alternatives for grain-based desserts may be available, grain-based desserts are categorically not allowed since requiring the establishment of nutrient standards would be burdensome for sponsors. Items listed with a superscript 3 or 4 on [Exhibit A](#) would be considered a grain-based dessert. Check out the [Grain-Based Desserts in the CACFP Worksheet](#) for more information.

Common Grain-Based Desserts

- Brownies
- Breakfast bars, granola bars
- Cakes/Cupcakes
- Cookies, including vanilla wafer
- Doughnuts
- Fruit rolls/bars
- Gingerbread
- Ice cream cones
- Marshmallow cereal treats
- Pie crusts, fruit turnovers
- Sweet bread puddings
- Sweet biscotti
- Sweet croissants
- Sweet pita chips
- Sweet rice pudding
- Sweet scones
- Sweet rolls, such as cinnamon rolls
- Toaster pastries

Crediting Grain Ounce Equivalents

Beyond creditability, meeting component requirements means meeting **minimum portion size requirements**. The table below shows the requirements by age group for the child meal pattern.

Meal Type	Ages 1-5	Ages 6-18
Breakfast, Lunch, Supper, and Snack (when serving grains)	½ ounce equivalent	1 ounce equivalent

What is An Ounce Equivalent (oz. eq.)?

Ounce equivalence is a **method of measurement** for the grains and meat/meat alternate components in the Child Nutrition Programs. In the grain's component, it allows sponsors to credit for the amount of grains in a grain product. Many grain products have non-grain ingredients, such as water, milk, oil, and eggs, that increase the weight of the final products. Ounce equivalents estimate or calculate the total amount of creditable grain in a product.

For example: a pancake may weigh two ounces total, but if you look at the ingredients in a recipe, only one ounce of each pancake is flour, which is a grain. The weight of the other ounce may be from eggs, sugar, milk, or water. The pancake would credit as one ounce equivalent.

Determining Ounce Equivalents in the Grains Component

The easiest way to figure out if a specific grain product meets minimum portion size requirements is to look at the [Using Ounce Equivalents for Grains in the CACFP Worksheet](#) from USDA's Team Nutrition. This worksheet includes a grains measuring chart with common grain products and the amount that must be served to meet the minimum ounce equivalent portion size.

For example, if you wanted to serve oatmeal to a group of 2 to 5 year olds, you would need to figure out the minimum portion size that must be served. Take a look at the Grains Measuring Chart from the [Using Ounce Equivalents for Grains in the CACFP Worksheet](#) and look for oatmeal.

Grains Measuring Chart for the Child and Adult Care Food Program			
Grain Item and Size	Age Group and Meal		
	1- through 5-year-olds at Breakfast, Lunch, Supper, Snack	6- through 18-year-olds at Breakfast, Lunch, Supper, Snack Adults at Snack only	Adults at Breakfast, Lunch, Supper
	Serve at Least ½ oz. eq., which equals about...	Serve at Least 1 oz. eq., which equals about...	Serve at Least 2 oz. eq., which equals about...
Cracker, Graham (about 5" by 2 1/2")**	1 cracker or 14 grams	2 crackers or 28 grams	4 crackers or 56 grams
Cracker, Round, Savory (about 1 1/2" across)**	4 crackers or 11 grams	7 crackers or 22 grams	14 crackers or 44 grams
Cracker, Saltine (about 2" by 2")**	4 crackers or 11 grams	8 crackers or 22 grams	16 crackers or 44 grams
Cracker, Thin Wheat, Square, Savory (about 1 1/4" by 1 1/4")**	6 crackers or 11 grams	12 crackers or 22 grams	23 crackers or 44 grams
Cracker, Woven Whole-Wheat, Square, Savory (about 1 1/2" by 1 1/2")**	3 crackers or 11 grams	6 crackers or 22 grams	10 crackers or 44 grams
Croissant at least 34 grams*	1 croissant or 34 grams	1 croissant or 34 grams	2 croissants or 68 grams
English Muffin (½ bottom) at least 56 grams*	1 muffin or 56 grams	1 muffin or 56 grams	1 muffin or 56 grams
French Toast Slice at least 19 grams*	8 sticks or 138 grams	8 sticks or 138 grams	8 sticks or 138 grams
Grits	1 cup cooked or 56 grams dry	1 cup cooked or 56 grams dry	1 cup cooked or 56 grams dry
Melba Toast (about 3 1/2" by 1 1/2")**	8 pieces or 44 grams	8 pieces or 44 grams	8 pieces or 44 grams
Muffin and Quick (bananas, etc.) at least 50 grams*	2 muffins/slices or 100 grams	2 muffins/slices or 100 grams	2 muffins/slices or 100 grams
Oatmeal	1/4 cup cooked or 14 grams dry	1/2 cup cooked or 28 grams dry	1 cup cooked or 56 grams dry
Pancake at least 34 grams*	1 pancake or 34 grams	1 pancake or 34 grams	2 pancakes or 68 grams

For 1-5 year olds,
minimum
portion size =
¼ cup

*Check that the item you want to serve weighs this amount, or more. See "Using the Nutrition Facts Label" on page 5 for more information.
**Check that the item you want to serve is about this size or larger. See "Grains Measuring Tools" on page 6 for more information.

Then look at the column for the right age group, and you will see that the minimum portion size is ¼ cup cooked. As long as a minimum of ¼ cup of oatmeal is served per child, this will meet minimum portion sizes for this age group.

Sponsors with grain items that are not listed on the worksheet may calculate the ounce equivalent by searching for the product in the Food Buying Guide or by seeing if the product falls into any of the categories listed in USDA's [Exhibit A](#) table.

The [Food Buying Guide](#) has a Food Items Search function and includes over two hundred grain food items. Below is the listing for soda crackers, which is a creditable grain item. To determine the ounce equivalent portion size, look for the Serving Size per Meal Contribution row which will provide the amount that must be served to meet a full serving. In this example, 8 crackers are required for a full 1 ounce serving. While the example lists 8 crackers as equal to 0.8 oz weight, this is because crackers are in Group A of [Exhibit A](#) where 0.8 oz weight is equivalent to 1 ounce equivalent of grains.

Food Item Details	
Meal Component	Grains
Category	Bread, Rolls, Crackers
Subcategory	SODA CRACKERS
Food As Purchased, AP	Soda Crackers (Group A) <i>Enriched²</i>
Purchase Unit	Pound
Servings per Purchase Unit, EP	22.50
Serving Size per Meal Contribution	8 crackers provide 1 grains serving (must weigh at least 22 g or 0.8 oz)
Purchase Units for 100 Servings	4.50
Additional Information	
Footnote	² Enriched grain items must be combined with at least 50% whole grains to meet the Food and Nutrition Service's whole grain-rich (WGR) criteria.

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For more instructions and examples on crediting with ounce equivalents, Sponsors can view ODE CNP's [CACFP Meal Pattern Success: Using Ounce Equivalent for Grains](#) video.

A grain item must provide at least 0.25 ounce equivalent of grains to count towards the grains component. Multiple grain items or combination foods with grain components may be used to meet the minimum portion size requirements.

Common Grain Component Questions

The grain item I bought has “Includes Whole Grains” on the packaging, but my specialist tells me it is not a whole grain-rich item. Why is that?

Products in the marketplace may include some whole grain ingredients but does not meet the whole grain-rich definition of having at least 50% of the grain ingredients be whole grains. The only way to verify that a product is truly whole grain-rich is by using one of the six methods to determine WGR items.

Is popcorn a whole grain-rich food?

Yes, it is. However, it takes 3 cups of popped popcorn to meet 1 oz. eq. of whole grains. This may not be a reasonable volume of food for most participants to consume. Please note that sweetened and candied popcorn are considered a grain-based dessert and will not be creditable.

Crediting Meat/Meat Alternates (M/MA)

CACFP Meat/Meat Alternate Requirements

Meat/meat alternates (M/MA) are a required component for lunch and supper and are an optional component at snack. For breakfast, a M/MA can substitute for the grain's component up to three times a week. When substituting for grains, one ounce equivalent of M/MA is equal to one ounce equivalent of grains. A child aged 1-5 years old would require ½ ounce equivalent M/MA and a child aged 6-18 years old would require 1 ounce equivalent M/MA when substituting a M/MA for the grain component at breakfast. The M/MA component cannot substitute for any other component at breakfast.

Crediting Meat/Meat Alternate with Ounce Equivalents

The minimum portion size of meat/meat alternates (M/MA) are listed below by age group for the child meal pattern.

Meal Type	Ages 1-2	Ages 3-5	Ages 6-18
Lunch and Supper	1 ounce equivalent	1½ ounce equivalents	2 ounce equivalents
Snack (when serving M/MA)	½ ounce equivalent	½ ounce equivalent	1 ounce equivalent

Like grains, many meats and meat alternates do not credit for the full weight of the item. For example, a typical 3.7 ounce chicken drumstick will only credit for 1.8 ounce equivalent of lean meat according to the [Food Buying Guide](#). This is because the additional 1.9 ounces weight includes bones, fat, and skin that do not credit towards the M/MA component. The component only counts the lean meat or protein component of the food item, not the full weight.

A M/MA item must provide at least 0.25 ounce equivalent of meat or meat alternate to count towards the M/MA component. Multiple M/MA items or combination foods with M/MA components may be served together to meet the minimum portion size for each age group.

Creditable Meat/Meat Alternates

There are many different options available for meat/meat alternates. Creditable M/MA include lean meat, poultry, dried meat, fish, seafood, surimi, cheese, egg, cooked beans and peas, nuts and seeds, nut and seed butters, tofu, or alternate protein products (APP).

All meat, poultry, fish, and shellfish must meet state or local regulations for food safety with some limited exceptions (see [Serving Traditional Foods](#)). All meats and seafood must be cooked, and eggs must be pasteurized.

Some M/MA items have additional rules associated with crediting. See the following sections for more details.

Lean Meats and Poultry

Only lean meats are creditable for the CACFP. Many meats and poultry include fat, skin, and bone in addition to the lean meat. Some items, such as bacon, are mostly fat and are not creditable for Child Nutrition Programs. When choosing meat or poultry items, the cut of the meat or poultry will determine how much of the meat will be creditable lean meat. The [Food Buying Guide](#) includes information on many commonly purchased meat and poultry items and provides the edible portion (EP) that can be counted towards the M/MA component.

The 'Using the Food Buying Guide to Calculate Amounts Needed' example on the next page provides information on how to use the information from the Food Buying Guide to hand calculate out the amount of meat needed for a recipe.

The [Food Buying Guide](#) also has several helpful tools, such as the Recipe Analysis Workbook and the FBG Calculator, that can help menu planners and recipe creators

to calculate out how to meet minimum portion sizes for the M/MA component and all other required components.

Yogurt

Creditable yogurt includes commercially prepared plain or flavored yogurt made from cow's milk and soy. Homemade yogurt is not creditable due to safety concerns.

Four ounces of yogurt credits as one ounce meat/meat alternate (M/MA).

Yogurt served in CACFP must meet a sugar limit requirement similar to breakfast cereals. As of October 1, 2025, all yogurts must contain no more than 12 grams of added sugars per 6 ounces. This sugar limit for yogurt applies to all age groups, including infants.

The easiest way to determine if a yogurt meets the sugar limit threshold is to check against a sugar limit table, such as the [CACFP Yogurt Added Sugar Limit Wallet Card](#) or the [USDA Choose Yogurts That are Lower in Added Sugar Handout](#). The tables provide the serving size which can be found on the Nutrition Facts Label of the yogurt and the total sugar limit. If the Nutrition Facts Label includes an Added Sugar amount greater than the sugar limit, then the yogurt will not be creditable. Further information on how to use the CACFP Yogurt Sugar Limit Wallet Card can be found on the [How to Use the CACP Sugar Limit Wallet Cards - Added Sugars](#) Handout.

In some special cases, a calculation may be needed to figure out if a yogurt meets the sugar limit threshold. USDA has their [Calculating the Added Sugar Limits for Yogurt in the CACFP](#) handout that walks through the steps.

The following yogurt-based items are **not** creditable in CACFP:

- Frozen yogurt – this applies to the dessert, regular yogurt that is frozen is allowable.
- Drinkable yogurt
- Homemade yogurt
- Yogurt-flavored products
- Yogurt bars/bark
- Yogurt-covered fruits and nuts
- Yogurt in commercially-prepared smoothies
- Non-soy alternative yogurts

Using the Food Buying Guide (FBG) to Calculate Amounts Needed

How much ground beef do you need to buy for a recipe you are making? In this example, you are purchasing 80% lean/20% fat ground beef. First, search the [Food Buying Guide](#) under 'Food Items Search' for 'ground beef' and it will bring up several ground beef items. The listing below will best match the item:

Food Item Details

Meal Component	Meats/Meat Alternates
Category	Beef and Beef Products
Subcategory	BEEF, GROUND, fresh or frozen
Food As Purchased, AP	Beef, Ground, fresh or frozen^{*,10} <i>no more than 20% fat, Includes USDA Foods, (Like IMPS #136)</i>
Purchase Unit	Pound
Servings per Purchase Unit, EP	11.80
Serving Size per Meal Contribution	1 oz cooked lean meat
Purchase Units for 100 Servings	8.50
Additional Information	1 lb AP = 0.74 lb cooked, drained, lean meat
Footnote	[*] USDA recommends that the very young, the very old, and those with weakened immune systems not eat undercooked ground beef. To be sure all bacteria are destroyed, cook meat loaf, meat balls, casseroles, hamburgers, and other dishes containing ground beef to the temperature set by your local and State standards and check by using a thermometer

This FBG yield information listing tells us that if you purchase a pound of 80/20 ground beef, you would get 11.80 servings of edible portions (EP) if your serving size is 1 ounce. It further states that to get 100 1-ounce servings, you would need to purchase 8.5 pounds of 80/20 ground beef. If you were serving 6-13 year olds who require 2 ounce servings, you would simply multiply by 2 so that for 100 2-ounce servings, you would purchase 17 pounds of 80/20 ground beef.

Another way to calculate the amount needed is to use the formula provided under the Additional Information row. In this example, it shows that 1 pound (lb.) of 80/20 beef as purchased (AP) is equal to 0.74 lbs. of cooked, drained, lean meat.

If your recipe calls for 5 lbs. of 80/20 beef, **how many 2-ounce portions can you serve with 5 lbs. of 80/20 beef?** We can calculate it out.

Since 1 lb. of 80/20 ground beef = 0.74 lb. cooked, drained, lean meat:

5 lbs. of 80/20 ground beef x 0.74 = 3.7 lbs. of cooked, drained, lean meat

Since 1 lb. = 16 ounces:

3.7 lbs. of cooked, drained, lean meat x 16 ounces/lb. = 59.2 ounces

To serve 2-ounce portions:

59.2 ounces total ÷ 2 ounce portions = 29.6 portions → **29 portions***

*Since you cannot have partial portions, you must always round down to the nearest portion.

For 5 lbs. of 80/20 beef, you will get 29 portions of 2-ounce equivalent lean meat. Once you figure out the number of portions, check that the number of servings in your recipe matches or does not exceed the portion number. For example, if the recipe is for 35 servings, you know that each serving will get less than 2-ounce equivalent of lean meat and will need to update the recipe to 29 servings or less.

Nuts and Seeds

As of July 1, 2024, nuts and seeds may now credit for the full Meat/Meat Alternate (M/MA) component instead of being restricted to only half of the M/MA component at meals. Nuts and seeds are credited by weight where 1 ounce weight of nuts and seeds will equal 1 ounce equivalent. This means that a 6-year old who needs 2 ounces of M/MA for lunch can receive up to 2 ounces of nuts and seeds for their lunch.

Sponsors can continue to serve nuts and seeds with other M/MA items. A common pairing is to combine a 1-ounce packet of nuts or seeds with a 1-ounce stick of string cheese.

Similarly, nut and seed butters may credit toward the entire M/MA component. 2 tablespoons (Tbsp) of nut or seed butter is equal to 1 ounce equivalent M/MA. This means that a 3-year old who needs 1.5 ounces of M/MA for lunch can receive a sunflower butter sandwich as the full M/MA component if the sandwich includes 3 Tbsp of sunflower butter.

While it is allowed to serve nut or seed butter for the full M/MA component, it may not be practical to provide the full serving of nut or seed butters for a meal. It is also common to see a nut or seed butter sandwich served with 2 Tbsp/1 ounce of nut or seed butter along with a 1-ounce stick of string cheese.

Child care centers are urged to use caution when serving nuts and seeds to children under 4 years of age since these food items may cause choking.

Acorns are non-creditable since they do not contain sufficient protein.

Eggs

Only whole eggs are creditable towards the meat/meat alternate (M/MA) component. One large egg credit as 2 ounces M/MA.

Egg white only, egg yolk only, and liquid egg substitutes that are made only of egg whites or egg yolks are not creditable.

Cheese

Natural or processed cheese are credited by weight where 1 ounce weight of cheese is equal to 1 ounce equivalent of meat/meat alternate (M/MA). Natural or processed cheese can include commonly found cheese such as American, cheddar, mozzarella, Swiss, Feta, Parmesan.

Cottage or ricotta cheese credits for only half of its weight, where a 2 ounce or ¼ cup serving provides only 1 ounce equivalent of M/MA.

Similarly, cheese foods, cheese food substitutes, cheese spreads, and cheese spread substitutes only credit for half of its weight with 2-ounce servings providing only 1 ounce equivalent of M/MA.

Imitation cheese, cheese products, and cream cheese are non-creditable food items due to the high fat and low protein that they provide. Homemade cheeses are not creditable due to safety concerns.

Beans/Legumes

Canned and dried beans are creditable with ¼ cup of cooked, heated, and drained beans providing 1 ounce equivalent of meat/meat alternate (M/MA).

When beans or legumes are ground up into a dip, such as bean dip or hummus, they commonly will include other ingredients such as water, oil, and spices and will be considered a combination food. See the section on [Crediting Combination Foods](#) for more information on definitions of combination foods, and see [Chapter 10 Meal Service and Menu Documentation](#) for supporting documentation requirements.

Beans and legumes can be credited as either a meat alternate or a vegetable but cannot be credited for both components in the same meal.

Alternative Flours and Pastas

Bean and nut flours have been growing in popularity in the marketplace. Bean and nut flours are most often seen in alternative pasta products such as chickpea or red lentil pasta. To credit pasta made with 100% legume flours, ½ cup of cooked pasta will equal 2 ounce equivalents of meat/meat alternate (M/MA). M/MA products have a visual recognition requirement, which requires that products served must be recognizable. Due to this requirement, all alternative flours must be offered with additional visible M/MA in order to credit as a M/MA ([CACFP Memo 13-2019](#)). This means that legume pasta must be served with another M/MA such as tofu, cheese, or meat.

Alternative flours that are mixed in with other ingredients can only be credited as a combination food item and will require additional supporting documentation to determine crediting. See the section on [Crediting Combination Foods](#).

Tofu

Commercially made tofu may be creditable if it contains at least 5 grams of protein for every 2.2 ounces weight or ¼ cup by volume. If it meets that protein threshold, a 2.2 ounce serving by weight will provide 1 ounce equivalent of meat/meat alternate (M/MA). Most firm and extra firm tofu will meet the protein requirements, but silken, soft, and medium firm tofu may not. It is important to always check the Nutrition Facts Label for all tofu products to ensure that the protein threshold is met prior to purchasing the product. Tofu with greater than 5 grams of protein per 2.2 ounce weight will still credit as 1 ounce equivalent per 2.2 ounce weight or ¼ cup volume of tofu ([CACFP Memo 02-2024](#)).

Tofu must be easily recognized as a meat substitute and cannot be blended in a smoothie or in a soup.

Homemade or non-commercial tofu is not creditable.

Tempeh

Tempeh was updated to be creditable in Child Nutrition Programs ([CACFP Memo 12-2019](#)) and can be credited by weight for tempeh products that include only soybeans (or other legumes), water, tempeh culture, vinegar, seasonings, and herbs. 1 ounce weight of tempeh is equal to 1 ounce equivalent of meat/meat alternate (M/MA).

If the tempeh includes other ingredients, such as brown rice, sunflower seeds, sesame seeds, or other vegetables, it will need to have additional supporting documentation, such as a Child Nutrition label or a Product Formulation Statement, in order to be creditable.

Surimi

Surimi seafood is a pasteurized, ready-to-eat, restructured seafood usually made from pollock (fish). It is often marketed as “fake crab” or “krab meat.” In 2019, it was allowed as a creditable meat/meat alternate (M/MA) item ([CACFP 11-2019](#)). Surimi crediting is as follows:

- 4.4 ounce portion of surimi by weight will credit as 1.5 ounce equivalent M/MA
- 3.0 ounce portion of surimi by weight will credit as 1.0 ounce equivalent M/MA
- 1.0 ounce portion of surimi by weight will credit as 0.25 ounce equivalent M/MA

Surimi products may vary and additional supporting documentation (see [Chapter 10 Meal Service and Menu Documentation](#)) will be required to credit differently than listed above.

Dried and Semi-Dried Meats, Poultry, and Seafood

Dried meat products such as jerky and summer sausages are potentially creditable for CACFP. Since there is no industry standard for dried meat and seafood products, all items will require either a product formulation statement (PFS) or a Child Nutrition (CN) label in order to determine crediting ([CACFP Memo 8-2019](#)).

Dried meat, poultry, and seafood without additional supporting documentation that provides crediting information will not be creditable.

Alternate Protein Products (APP)

Alternate Protein Products (APP) include items such as soy protein isolate or whey protein concentrate. They are generally included as an added ingredient in processed meat/meat alternate (M/MA) products such as meat or vegetarian patties. Like other combination food items without an industry standard, additional supporting documentation is required in order to determine crediting. At a minimum, a Child Nutrition (CN) label or a product formulation statement (PFS) of the food product must be available. Depending on the information provided, additional supporting documentation defining the creditability of the APP ingredient may also be required. See [Chapter 10 Meal Service and Menu Documentation](#) for detailed guidance on documentation requirements.

APP without any supporting documentation will not be creditable.

Combination M/MA Products

Combination foods in the CACFP are items that have a mix of different ingredients from different food components or are a mix of creditable and non-creditable ingredients. Products such as pepperoni, sausages, chicken nuggets, corn dogs, fish sticks, and falafel are considered to be combination foods.

All combination foods will need additional supporting documentation in order to be creditable. This is because it is difficult to measure whether a combination food item meets minimum portion size requirements without additional crediting documentation such as a recipe or a product formulation statement. See [Chapter 10 Meal Service and Menu Documentation](#) for detailed guidance on documentation requirements.

Crediting Vegetables and Fruits

Although vegetables and fruits are two separate components for lunch, supper, and snacks, they have many similarities and are considered a combined component for breakfast.

Vegetables or fruit are required for breakfast. For lunch and supper, both the vegetable and fruit component must be provided, although a vegetable can be substituted for the fruit component at both lunch and supper. When vegetables are substituted for the fruit component, two different kinds of vegetables must be served. Vegetables and fruits are optional components at snack and as separate components, a snack can consist of one vegetable and one fruit.

All vegetables are credited based on their volume as served, except for raw **leafy greens**, such as spinach, kale, or lettuce, which count as half of the volume. This means that 1 cup of raw leafy greens credit as $\frac{1}{2}$ cup of vegetables. Once cooked, leafy greens credit for the volume served ([CACFP Memo 09-2017](#)).

All fruits are credited based on their volume as served, except for **dried fruit**, which counts for twice the volume. This means that $\frac{1}{4}$ cup of dried fruit credits as $\frac{1}{2}$ cup of fruit.

The following tables show the required **minimum portion sizes** of vegetables and fruits for different child age groups based on the meal or snack.

Meal Type	Ages 1-2	Ages 3-5	Ages 6-18
Breakfast (vegetables, fruits, or portions of both)	$\frac{1}{4}$ cup	$\frac{1}{2}$ cup	$\frac{1}{2}$ cup
Lunch and Supper (vegetables and fruits are separate components)	$\frac{1}{8}$ cup vegetables $\frac{1}{8}$ cup fruits	$\frac{1}{4}$ cup vegetables $\frac{1}{4}$ cup fruits	$\frac{1}{2}$ cup vegetables $\frac{1}{4}$ cup fruits*
Snack (vegetables and fruits are separate components)	$\frac{1}{2}$ cup vegetables $\frac{1}{2}$ cup fruits	$\frac{1}{2}$ cup vegetables $\frac{1}{2}$ cup fruits	$\frac{3}{4}$ cup vegetables $\frac{3}{4}$ cup fruits

*When replacing the fruit component with a second vegetable item, the second vegetable only needs to meet the portion size of the fruit component.

A minimum of $\frac{1}{8}$ cup of vegetable or fruit must be served to count towards the vegetable or fruit meal pattern requirement when served in a combination dish or

when used as garnish. For example, the vegetables in a soup must total at least 1/8 cup of vegetables in order to count towards the vegetable meal component requirement.

Vegetables and fruits may be fresh, frozen, canned, or dried. A serving of cooked vegetables means *drained* vegetables. A serving of cooked, canned, or frozen and thawed fruit means fruit with its juices. Home canned vegetables and fruits are not creditable.

Crediting 100% Juice

Pasteurized, full-strength (100% fruit or vegetable) juice may be served once per day as part of the CACFP meals or snacks. It may be fresh, canned, frozen, or reconstituted from concentrate to its full-strength (100% juice) form. Both fruit and vegetable juice counts toward the once per day juice limit.

Juice blends are creditable as long as the blended juice is 100% vegetable and/or fruit juice. If the blend contains both vegetables and fruits, it will credit towards the component that contains the most prominent ingredient, which will be the first ingredient on the Ingredient List ([CACFP Memo 09-2017](#)). The juice blend cannot credit towards both components. When fruit juice is served for snack, fluid milk cannot be the other component.

Fruit or vegetable puree used in smoothies will also credit as a juice and count towards the once per day juice limit ([CACFP Memo 17-2019](#))

Beans/Legumes

In the vegetable component, beans credit for the volume served. This means that ¼ cup of beans will credit for ¼ cup of the vegetable component.

Beans and legumes can be credited as either a vegetable or a meat/meat alternate but cannot be credited for both components in the same meal.

Alternative Flours and Pastas

Pasta products made with 100% vegetable flours may credit towards the vegetable component. Like other vegetables, pasta made of 100% vegetable flour will credit for its volume ([CACFP Memo 13-2019](#)). This means that ½ cup of pasta made of 100% vegetable flour will credit as ½ cup of vegetable. The most common 100% vegetable flour pasta is red lentil pasta.

Alternative flours that are mixed in with other ingredients can only be credited as a combination food item and will require additional supporting documentation to determine crediting. See the section on [Crediting Combination Foods](#).

Common Vegetables and Fruits Components Question:

Are veggie straws, potato chips, or cauliflower chips creditable for the vegetable component?

No. These items are considered snack foods and are not allowed because they do not contain sufficient nutrients per serving and contain high amounts of fat and sodium. Many veggie sticks and straws also do not contain sufficient amount of vegetables per serving.

Can combination mixed vegetables like carrots and peas be used as two different vegetable components (substituting for one fruit component) for lunch or supper?

Yes. However, a recipe or a product formulation statement must be available to show how the ingredients credit for each component.

Crediting Fluid Milk

Fluid milk is a required component for breakfast, lunch, and supper, and is an optional component at snack.

All fluid milk served must be pasteurized and meet State standards for fluid milk. Creditable milk include cow's milk, goat's milk, cultured buttermilk, lactose-reduced milk, or lactose-free milk. Milk fat types or milk type requirements are based on age. The [Serving Milk in the CACFP](#) handout provides a helpful resource for Sponsors training staff on fluid milk requirements.

Age Group	Milk Type Required	Portion Size
12 months - 23 months	Unflavored whole milk (Iron-fortified infant formula allowed between 12-13 months to help with the transition to whole milk)	4 fluid ounces

Age Group	Milk Type Required	Portion Size
2 years	Unflavored fat free (skim) or low fat (1%) milk (2% milk is allowed from 24-25 months to help transition from whole fat milk to fat-free or low fat milk)	4 fluid ounces
3-5 years	Unflavored fat free (skim) or low fat (1%) milk	6 fluid ounces for breakfast, lunch, supper 4 fluid ounces for snack
6 - 18 years	Unflavored fat free (skim) or low fat (1%) milk Flavored fat free (skim) or low fat (1%) milk	8 fluid ounces

Flavored straws, syrups, and powders may not be added to unflavored milk for children 5 years old and younger.

Fluid milk may be credited when used in smoothies. The milk used must be the appropriate milk type for the age group served. ([CACFP Memo 17-2019](#))

Milk used in cooked cereals, puddings, soups, or other foods may not be credited towards the milk meal pattern requirement.

When fluid milk is served for snack, 100% fruit juice cannot be the other component.

CACFP participants who require a milk fat type that is different from the milk type required for the age group must have a Medical Statement on file in order for the meals/snacks to be reimbursed. Non-dairy milk substitutes that meet nutritional equivalence can be served if a Meal Preference Request Form is on file ([7 CFR 226.20\(g\)\(3\)](#)). See [Section E - Meal Accommodations and Modifications](#) for more information.

As of 2023, the Department of Early Learning and Care (DELIC) required Certified Child Care Centers and Certified School-Age Child Care Centers to allow parents to request that their children are not served milk (see [Rules for Certified Child Care Centers](#) OAR 414-305-1140(4)(c) and [Rules for Certified School-Age Child Care Centers](#) OAR 414-310-0620(4)(c)(D)). Sponsors are encouraged to work with parents to discuss appropriate alternatives if parents request alternatives to fluid milk. CACFP requirements for fluid milk will still apply and sponsors must serve a nutritionally

equivalent milk substitute in order for meals and snacks to be reimbursed if the request is not due to a disability or medical reason. See [Section E - Meal Accommodations and Modifications](#) for more information.

Serving Breastmilk for Children

Breastmilk is considered fluid milk in the CACFP meal pattern and is a creditable milk that may be offered to children of any age without a Medical Statement or Meal Preference Form on file. Meals are reimbursable if the parent/guardian provides expressed breast milk or when a mother breastfeeds a child at the center.

Breastmilk may be served in combination with other milk types for a reimbursable meal. For example, a mother may bring 2 fluid ounces of breast milk for a child who is 16 months old, and the sponsor can provide the additional 2 fluid ounces of whole milk to make the full 4 fluid ounce serving.

Crediting Combination Foods

Combination foods in the CACFP are items that have a mix of different ingredients from different food components or are a mix of creditable and non-creditable ingredients. A combination food dish may be used to credit up to a total of three different components.

For example, a smoothie is combination food that can credit for the fluid milk component using the appropriate milk type for the age group, meat/meat alternate (M/MA) component using a yogurt that meets the sugar limit, and a sufficient portion of fruit. Another common example is cheese and spinach lasagna, where the cheese credits for the M/MA component, the spinach and other vegetables credit for the vegetable component, and the lasagna noodles credit for the grain component.

Many combination foods credit for only one or two food components. Combination foods that only credit for one component include items that mix creditable and non-creditable ingredients such as pepperoni.

Combination foods are divided into homemade or commercially prepared categories.

Homemade combination foods are those that are assembled from multiple ingredients in a kitchen serving the sponsor's site(s), whether the kitchen is operated by the sponsor or operated by the vendor from whom the sponsor is purchasing meals. Homemade combination foods require a written standardized recipe documenting the amount of all ingredients in the product, including a section showing how the recipe credits toward CACFP food components.

Commercially prepared combination foods are food items that are purchased packaged from a market or vendor and will need additional documentation to show how ingredients credit for each food component. Common items include chicken nuggets, chicken patties, hamburger patties, and pizza. Commercially prepared combination foods require either a Child Nutrition (CN) label, a product formulation statement (PFS), or be an item that has a [standard of identity](#). Items with a standard of identity must have a product name on the label that matches the standard of identity item exactly. For example, an item called chicken chili with vegetables would not meet the standard of identity for “chicken chili.”

See [Chapter 10 Meal Service and Menu Documentation](#) for detailed guidance on documentation requirements for combination foods.

Serving Traditional Foods

Traditional foods are defined as traditional Indigenous foods that have been prepared and consumed by Native American or Indian Tribes. These foods specifically include wild game meat, fish, seafood, marine mammals, plants, and berries (see definitions from the [CACFP Crediting Handbook](#)).

Crediting for some traditional foods may be found in the [Food Buying Guide](#) such as ground venison, native corn, and wild rice. Sponsors may use yield information for similar products if the traditional food is not listed (see [TA Memo 01-2024](#)).

Fresh grown fruits and vegetables and freshly caught fish are allowable in CACFP if these foods meet the policies of the State and local (county) Environmental Health Department regarding food safety.

Meat and meat products must be USDA inspected in order to be used in CACFP meals and snacks. USDA’s Food Safety and Inspection Service (FSIS) has mandatory inspection authority over all food products from cattle, sheep, swine, goats, horses, mules, and other quines, chicken, turkeys, ducks, geese, guineas, ratites (emu, ostrich, and rhea), and squab. Additional, FSIS does voluntary inspection of reindeer, elk, deer, antelope, water buffalo, bison, migratory water fowl (such as ducks and geese), game birds, and rabbits.

All game meat must be purchased from USDA-inspected establishments, or State Meat and Poultry Inspection Programs. Uninspected game meat is not allowed to be served in all Child Nutrition Programs.

Note that while Section 4033 of the 2014 Farm Bill allowed the donation of traditional game meats to bypass State or USDA inspection ([CACFP Memo 19-2015](#)), Oregon

state law ([ORS 610.095](#)) requires donated game meat to be inspected by the State Department of Agriculture, State Department of Fish and Wildlife, or the Department of State Police ([ORS 610.095](#)). The state law must be followed per section 4033(c)(7) of the bill.

Some traditional foods may not be creditable, such as acorn, which is not creditable due to low protein content ([TA Memo 01-2024](#)). Non-creditable traditional foods may be served as bonus food items or as part of taste tests and educational activities.

Starting July 1, 2024, tribal communities who serve primarily American Indian participants will also be allowed to substitute vegetables for the grain component ([Final Rule – Child Nutrition programs: Meal Patterns Consistent with the 2020-2025 DGAs](#)). This flexibility will apply to all age groups, including the infant meal pattern.

Any creditable vegetable can be used as a substitute for a grain item and there are no limits on the number of times a vegetable can be substituted for the grains component. Vegetables that credit for the grains component cannot be credited towards the vegetable component. ½ cup of vegetables, or 1 cup of leafy greens, will substitute for 1 ounce equivalent of grains. When substituting for the grain component, the vegetables can count towards the whole-grain rich component. For more information on this flexibility, check out [CACFP Memo 03-2025](#).

Other Non-Creditable Foods

In addition to non-creditable foods listed in each of the meal component sections earlier in this chapter, other common non-creditable foods include condiments such as ketchup, mustard, or relish. While condiments are non-creditable, they are considered supplemental food items that make up a meal and unlike bonus foods, they are considered allowable expenses for the CACFP non-profit food service fund (see [Chapter 7 Financial Management of the CACFP](#)).

Most non-creditable foods however, will be considered bonus foods, and will be considered a non-allowable expense and must be paid for with non-CACFP funding. Common non-creditable foods are listed on the [Non-Creditable Food List](#).

Section D - Additional Requirements

The CACFP has several additional requirements that must be met by Center-based sponsors.

Food Safety and Sanitation

All CACFP sponsors must ensure that proper sanitation and health standards are met when storing, preparing, and serving food. Sponsors must meet all state and local laws and regulations ([7 CFR 226.20\(l\)](#)) related to health and sanitation, including requesting and passing all required sanitation inspections.

Water Availability

Sponsors must offer water to children throughout the day ([CACFP Memo 20-2016](#)). This requirement does not apply to adult day care centers. Offering water means asking the children whether they would like water at different times throughout the day. For very young children, this may require visual cues such as showing the cup or water fountain while verbally offering the water.

While drinking water must be made available for children during meal times, it does not have to be served alongside the meal. Water is not part of the reimbursable meal and may not be served instead of fluid milk. If water is offered during a meal, Sponsors should consider offering smaller amounts of water and be aware that children who drink too much liquid may feel too full to eat.

Sponsors are encouraged to serve water with snacks when no other beverage is being served. A good time to offer water more frequently is during or after physical activity, on hot summer days, or cold winter months when the air is drier because of indoor heating.

CACFP regulations require that water provided meets all federal and state requirements. Oregon child care regulations require all child care facilities to test for lead in drinking water ([OAR 414-300-0205](#)). More information on lead testing and available resources can be found on the [Oregon Department of Early Learning and Care's Lead Testing page](#).

Costs related to the purchase of potable (safe and drinkable) water for consumption by CACFP participants, or water testing services, could be considered an allowable CACFP expense if costs are determined to be reasonable, necessary, and allocable. See [Chapter 7 Financial Management of the CACFP](#) for more information on allowable costs.

Food Preparation

Prohibition on Deep-Fat Frying

Sponsors are not allowed to serve deep-fat fried foods that are prepared on site as part of a CACFP reimbursable meal or snack ([7 CFR 226.20\(d\)](#)). Deep-fat frying is

defined as “cooking by submerging food in hot oil or other fat.” Foods that are pre-fried, flash-fried, or par-fried by a commercial manufacturer may be served but must be reheated by a method other than frying.

Prohibition on Using Foods and Beverages as Punishments or Rewards

The CACFP regulations prohibit the use of CACFP meals and snacks as punishments and rewards. ([7 CFR 226.20\(p\)](#)). This prohibition helps to promote healthy eating habits. Participants should be encouraged, but never forced, to eat all the food offered.

Parent/Guardian Provided Component

All parents and guardians are allowed to provide up to one component of a reimbursable meal for their infant or child ([CACFP Memo 08-2017](#)). The parent/guardian provided component must be creditable in order for the meal to be reimbursable.

For participants with disabilities and medical meal accommodations, parents and guardians may provide one or more components of a reimbursable meal, including meal substitutions for medical needs, as long as the sponsor provides at least one required component ([7 CFR 226.20\(g\)\(1\)\(iv\)](#), [CACFP Memo 08-2017](#)). Parents and guardians may choose to provide the entire meal, but in those situations, the meals or snacks would not be reimbursable.

All parent or guardian provided components must be voluntary on the part of the parent or guardian and not coerced by the sponsor.

If parents or guardians wish to provide a bonus food item outside of the reimbursable meal, such as desserts for special occasions, the bonus items are encouraged to be served after the CACFP meal to help ensure that foods in the CACFP meal pattern are eaten first and the children’s nutritional needs are met before additional foods are offered.

Parent/guardian provided components must be documented, and sponsors must have a procedure in place for this practice to ensure that meal counts are only taken for reimbursable meals and snacks. Sponsors are not required to accept parent and guardian provided components outside of participants with disabilities, but a consistent policy that is applicable to all participants must be in place.

Section E - Meal Accommodations and Modifications

Meal accommodations and modifications are changes to the menu or meal service for individuals or groups of individuals. While menu modifications can also apply to last-minute substitutions due to food spoilage, shipment issues, or other menu planning logistics, the focus of this section will be on individual accommodations requested by families.

There are two main types of meal accommodations.

1. Accommodations due to medical or disability-related requests
2. Accommodations due to non-medical requests

Medical Meal Accommodations

Sponsors are required to make **reasonable modifications** for medical or disability-related requests ([CACFP Memo 14-2017](#)) at no additional charge to the participant per the Americans with Disabilities Act (ADA) Amendments Act of 2008.

Defining Disability

From the ADA Amendments Act of 2008, the definition of a person with a disability is any person who has a physical or mental impairment which **substantially limits** one or more **major life activities or major bodily functions** or is regarded as having such impairment.

Major life activities and major bodily functions contain a wide range of activities and functions (see list on next page) to effectively mean that any impairment of activity or bodily function can be regarded as a disability.

While the term 'substantially limits' is used, it is important to recognize that impairment does not need to prevent or significantly restrict major life activity and that determination is based on individualized assessment without regard to measures to control the impairment. It can also include episodic impairment (not continuous) and can also include those in remission.

In effect, almost all medical requests will be considered disability requests. This can include conditions such as food allergies, children on the autism spectrum requiring food modifications, diabetes, and potentially obesity.

Major Life Activities

- Caring for oneself
- Performing manual tasks
- Seeing
- Hearing
- Eating
- Sleeping
- Walking
- Standing
- Bending
- Speaking
- Breathing
- Learning
- Reading
- Concentrating
- Thinking
- Communicating
- Working

Major Bodily Functions

- Functions of the immune system
- Normal cell growth
- Digestive
- Bowel
- Bladder
- Neurological
- Brain
- Respiratory
- Circulatory
- Cardiovascular
- Endocrine
- Reproductive functions

Who Decides if a Medical or Disability Accommodation is Required?

The need for a medical meal accommodation is determined by a **licensed health care professional or registered dietitian**.

In Oregon, licensed health care professionals are authorized to write medical prescriptions under State law and the full list of state licensed health care professionals are listed to the right.

It is important to note that sponsor staff must not question whether a participant has a medical need or disability and must follow the written guidance provided by the licensed health care profession or registered dietitian within reason.

List of State Licensed Health Care Professionals

- Medical Doctors (MD)
- Doctors of Osteopathy (DO)
- Doctor of Naturopathy (ND)
- Physician's Assistant (PA)
- Certified nurse practitioner or clinical nurse specialist
- Doctor of Dental Medicine (DMD)
- Doctor of Dental Surgery (DDS)
- Doctor of Optometry (OD)

The meal accommodation for a medical need or disability must be documented in writing with a **medical statement** if the accommodation does not meet meal pattern requirements (CACFP Memo 07-2025).

Sponsor Responsibilities

Sponsors are required to notify families of applicants with disabilities of their right to free meal accommodations as a result of the [Equal Opportunity Public Notification Policy](#). Notification may be posted on center webpages or included in enrollment

information or sent through program communications, such as newsletters or other online postings.

Sponsors are also required to let parents and guardians know if a complete **written medical statement** will be required as part of this process. ODE CNP has developed a [Medical Statement](#) template that's available in English, Russian, Simplified Chinese, Spanish, Vietnamese, Arabic, Chuukese, Somali, and Traditional Chinese on the [ODE CNP Meal Accommodations page](#). The medical statement does not have to be on the ODE CNP template, but must include:

1. The participant's major life activity or major bodily function that restricts the diet and is affected by the participant's physical or mental impairment.
 - a. The statement does not need to use the term "disabled" or "disability."
2. An explanation of what must be done to accommodate the disability or impairment.
 - a. In the case of dietary accommodation, the food(s) to be omitted.
 - b. Other meal accommodations to be made, as applicable (for example: special utensils or staff person to assist with eating, texture).
3. Food(s) substituted when the food(s) is/are omitted from the diet.
4. A signature from a state licensed health care professional or registered dietitian.

Registered dietitians (RD) and registered dietitian nutritionists (RDN) are equivalent credentials, and both are accepted. In Oregon, dietitians can be licensed and retain a licensed dietitian (LD) title, but this is not a requirement to practice dietetics within the state. RDs and RDNs who submit medical statements must follow the Code of Ethics for the Nutrition and Dietetics Profession and as best practice, healthcare professionals and dietitians submitting medical statements should have an established professional-patient relationship with the individual requesting the accommodation (CACFP Memo 07-2025). See also Oregon's [Guidance on Medical Statements from Registered Dietitians for Schools and Child and Adult Care Institutions and Facilities](#).

The written statement should have sufficient information about how the impairment restricts the participant's diet and how to accommodate the condition. There is no need to have a diagnosis on the statement. If the information is inadequate or unclear, sponsor staff must seek clarification from the parent or guardian. **Do not unnecessarily delay modification** as that can pose a health risk to the participant.

Families are allowed to use a note from a licensed healthcare professional or registered dietitian if it includes all the required information listed above. The form or note is valid from the day it is received and does not require annual renewal.

Sponsors in institutional settings where an Individual Education Plan (IEP) or a 504 plan is on file for a participant and the IEP includes the same information required on a medical statement can use the IEP in place of the medical statement.

Having a written medical statement will allow meals that do not meet meal pattern requirements to be reimbursable if it is due to meeting the medical needs of the participant. For example, in a situation where a child has Celiac disease and cannot have products with gluten, a substitute grain component that does not meet whole grain-rich or enriched grain requirements can be served and the meal claimed for reimbursement if the child has a complete medical statement on file. Similarly, a child who needs a non-nutritionally equivalent milk substitute due to a cow's milk allergy can receive almond milk with their meal and the meal can be claimed if the child has a completed medical statement on file.

Due to the difficulty many families encounter in getting a medical appointment, it is reasonable for sponsors to make meal accommodations prior to receiving a written medical statement.

To claim meals for reimbursement while waiting on a written medical statement, sponsors must **write down and keep on file:**

1. The date the modification was requested.
2. What modification or accommodation was requested.
3. When the family will return with the completed medical statement.

In situations where a meal modification or accommodation will still meet meal pattern requirements (for example, when a child has an allergy to a specific fruit, but the fruit can be substituted with another fruit item to meet meal pattern requirements), the sponsor is not required to collect a medical statement in order to make the accommodations, particularly if getting a medical statement would be burdensome for the family.

However, it would be considered best practice to have a written meal accommodation policy and procedure that details out when meal accommodations will be made and how the accommodations will be implemented to ensure that all sponsor staff are on the same page regarding safe food handling and meal service protocols.

Sponsors who have 15 or more employees are required to designate a **Section 504 coordinator** who manages compliance with disability requests. The coordinator addresses meal accommodations and establishes a grievance procedure to promptly and fairly resolve complaints.

For sponsors with less than 15 employees, while a Section 504 coordinator does not need to be designated, a grievance procedure must be established.

All sponsors should work with the family once a medical statement is submitted to determine what accommodation will be made for the participant **at no cost to the family**. Each accommodation should be determined on a case-by-case basis. There is a requirement for a **reasonable modification** to be made that is appropriate for the medical need or disability stated. In almost all situations, simply refusing to accommodate the participant is not appropriate. While modifications do not have to be identical to the modifications requested nor do they have to mirror the restricted food items, they should serve to meet the needs of the participant and allow the participant to take part in the benefit of the CACFP.

Parents and guardians of children with a disability or medical-related meal accommodation may choose to provide one or more components of a reimbursable meal as long as the sponsor provides at least one required component ([CACFP Memo 08-2017](#)). Sponsors must not coerce or otherwise require families to provide meal accommodations.

The primary objectives of sponsors in situations where a medical accommodation is needed are to provide the appropriate modification and keep the Medical Statement on file.

Non-Medical Meal Accommodations

Sponsors are not required to make substitutions for participants with non-medical meal accommodations but may choose to do so. ODE CNP recommends that all sponsors develop a consistent, organization-wide policy for non-medical meal accommodation. These may include cultural, religious, lifestyle, and other requests.

Non-medical meal accommodations that **meet** meal pattern are reimbursable. However, non-medical meal accommodations that **do not meet** meal pattern are non-reimbursable.

Sponsors who allow non-medical meal accommodations, including requests for nutritionally equivalent milk substitutes, should use the [ODE CNP Meal Preference Request Form](#). This form is also available in English, Russian, Simplified Chinese, Spanish, and Vietnamese on the [ODE CNP Meal Accommodations page](#). Sponsors who wish to use their own form should request approval from their assigned Child Nutrition Specialist.

The Meal Preference Request Form can be signed by the parent or guardian. This form can be used for participants who are requesting a nutritionally equivalent milk substitute even if the participant is requiring it as a medical need.

Nutritionally Equivalent Milk Substitutes

Fluid milk is a required component for breakfast, lunch, and supper; however, some participants may not be able to consume cow's milk or may choose to consume alternative milks.

A nutritionally equivalent milk substitute is a milk alternative that meets the same nutritional standard as cow's milk for fortification of calcium, protein, vitamin A, vitamin D, magnesium, phosphorus, potassium, riboflavin, and vitamin B-12. A nutritionally equivalent milk substitute meets the meal pattern requirement of fluid milk and can be served as part of a reimbursable meal when requested by a parent or guardian and documented with a Meal Preference Request Form or Medical Statement.

Note that children 5 years old and under who are served nutritionally equivalent milk substitutes must be provided unflavored options in order to meet meal pattern requirements.

Many milk substitutes on the market do not meet nutritional equivalence and therefore do not meet meal pattern requirements. Non-nutritionally equivalent milk substitutes can only be part of a reimbursable meal when a Medical Statement is on file for a medical accommodation.

[ODE CNP's Meal Accommodations page](#) includes more information about nutritionally equivalent milk substitutes, including a list of ODE CNP approved milk substitutes and worksheets to help determine if a milk substitute meets nutritional equivalence.

Resources for Meal Accommodations

Sponsors who would like guidance on how to best meet meal accommodation requests can use the [Meal Accommodations Decision Tree](#) which provides a step-by-step flowchart on forms and actions that must be taken depending on whether the meal accommodation is due to a medical need or a non-medical need.

ODE CNP has also created a [Meal Accommodations Quick Guide for Sponsors and Providers](#) which provide a two-page handout with definitions, basic requirements, and a reimbursement table showing whether a meal would be reimbursable or not.

Sponsors who are looking for handouts for the general public on how to request meal accommodations can use the ODE CNP [Requesting Meal Accommodations](#) handout which provides definitions and requirements.

Section F - Special Situations

Meal Pattern Flexibility During a Disaster – ODE CNP Approval Required

Child Nutrition Program policies are designed to allow flexibility and support continuation of meal benefits to participants in disaster areas. There are existing flexibilities in meal service requirements and administrative procedures that make it easier for sponsors to operate and respond to disaster situations. Available flexibilities are listed below:

- **Meal time:** meal service time requirements may be waived with prior approval from ODE CNP
- **Fluid Milk Flexibility** ([7 CFR 226.20\(e\)](#)):
 - When fluid milk is **temporarily** unavailable, sponsors may request approval from ODE CNP prior to implementation to serve breakfast, lunch, or suppers without milk during the emergency period.
 - If fluid milk is unable to be obtained on a **continuing basis**, an equivalent amount of canned, whole, dry, or fat-free dry milk may be substituted. This must also be approved by ODE CNP prior to implementation.

Sponsors who are affected by a milk supply shortage must notify ODE CNP by completing the [Milk Supply Shortage Form](#).

If changes to other meal component requirements are needed, sponsors must consult with ODE CNP.

Use of Donated Foods

The CACFP does not have restrictions against the use of donated foods. All foods used must meet health and safety regulations and meet all applicable inspection requirements. Foods that are past the expiration date may not credit toward meal pattern requirements (see the [CACFP Crediting Handbook](#)).

All sponsors who use donated food must document receipt of the foods and any service fees as part of the non-profit food service documentation. See [Chapter 7 Financial Management of the CACFP](#) for more information on documentation requirements.

Donation of Leftover Foods – Food Donation Policy

ODE CNP is committed to preventing hunger and responsible stewardship of Federal dollars. Child Nutrition Program policy aims first to limit food waste and unnecessary costs. If a CACFP sponsor has leftover food on a frequent basis, menu planning and production practices should be adjusted to reduce leftovers.

Nevertheless, because of unforeseen circumstances, there may be leftover food on occasion. All alternatives permitted by CACFP regulations and State, and local health and sanitation codes should be exhausted before discarding food. Options may include using leftovers in subsequent meal services, offering share tables, or transferring food to other sites for multi-site Sponsors.

Where it is not feasible to reuse leftovers, excess food may be donated to a non-profit organization, such as a community food bank, emergency shelter, or other non-profit charitable organizations ([CACFP Memo 05-2012](#)).

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Section A – Styles of Meal Service

For all meal service styles, food components must be served in sufficient amounts to meet minimum portion requirements. All components must be served together either on the table or given to each participant at the beginning of the meal. For example, milk or fruit cannot be served later in the meal than the other components.

It is important to note that meals packed by the sponsor and sent with a participant to eat at another location without the supervision of the sponsor's personnel are not eligible for CACFP reimbursement (see [Section B—Special Situations](#)).

Sponsors may choose one of the following methods of serving CACFP meals:

Restaurant Style Meal Service

In restaurant style meal service (or preset meal service), all food components are portioned and served on the plate and in the cup for each participant. Minimum portion sizes of each required component must be served together to each participant at the beginning of the meal. The point of service meal count is taken when all meal components are placed on the table and the participants are seated at the table with a complete meal in front of them.

Family Style Meal Service

Family style meal service allows participants to eat together and to make food choices based on individual appetites and food preferences. It promotes mealtime as a learning experience to help participants develop positive attitudes toward nutritious foods, share in group eating situations, and develop good eating habits.

Family style meal service operates as follows:

- All required meal components are placed on the table at the same time.
- Adequate amounts of each food item must be placed on the table to provide at least minimum portions for each participant and supervising adult to be served.
- Participants may serve themselves from serving dishes or communal bowls that are on the table.
- Adults supervising the meal help those participants who are not able to serve themselves.
- Participants are allowed to make choices selecting foods and in the size of the serving.
- A supervising adult must be seated at each table to actively encourage participants to take the full required portion of each food component. The supervising adult must offer the food item again later in the meal if participants

initially refuse the food or take a very small portion.

- The point-of-service meal count should be taken at the time participants are seated at the table with all required components placed on the table.

Family style meal service can be conducted in a variety of ways. For example, participants may help in preparing for the meal by clearing the table and setting places, sharing conversation during the meal, and cleaning up after the meal.

Refer to the ODE CNP [Family Style Meal Service](#) handout for more information. Additional information on Family Style Meal Service can be found in [CACFP memo 02-2025](#).

Combination Restaurant and Family Style Meal Service

Some sponsors find a combination of restaurant style and family style best meets the participants' needs. Combination meal service operates as follows:

- The full minimum required portion of one or more components are served restaurant style to each participant.
- The remaining components are served on the table in communal serving dishes or pitchers adhering to all of the Family Style Meal Service requirements.
- All components must be offered to participants at the same time. For example, it is not acceptable to serve participants the meat/meat alternate and vegetable or fruit components and wait for five minutes before setting the grains and the milk components on the table.
- In this meal service style, all the rules governing each service style apply to the foods served using that method. For example, if staff pours milk into glasses, at least the minimum required amount must be poured for each child and offered when the rest of the meal components are served.
- The point-of-service meal count must be taken when the participants are seated at the table, have been served the full minimum portions of the items served restaurant style, and the remaining items are placed on the table.

Cafeteria Style Meal Service

In cafeteria style, participants select food from a cafeteria line. Food is not available at the dining table.

Cafeteria meal service operates as follows:

- Participants must select the minimum required amounts of all required components their first time through the cafeteria line.
- Adults must supervise the cafeteria line to ensure each participant selects at

least the minimum required portions of all required food components.

- The point-of-service meal count must be taken when the participant has a complete, reimbursable meal in hand, and before or as they leave the cafeteria serving line.

Offer Versus Serve (OVS)

Offer versus serve (OVS) is a meal service option that may be used by **At-Risk Afterschool sponsors or adult day care sponsors only** with ODE CNP approval. It can be used in conjunction with restaurant or cafeteria style meal service.

Under OVS, participants may be permitted to decline a certain number of components offered without affecting the reimbursement for the meal. OVS is only allowed for breakfast, lunch, and supper meals.

OVS is not allowed at snack. OVS may not be implemented at snack because there are only two required components, and therefore, there is not enough food to allow a participant to decline some foods and ensure that the snack the participant takes is nutritionally sufficient.

Using OVS can help sponsors reduce food waste and cost while maintaining the nutritional value of the meal served. Using OVS is optional.

Under OVS, all meal pattern component servings in the correct serving sizes must be *offered*, but the participant only needs to choose three of four items offered for breakfast and three of five food components for lunch or supper. Note that for adult participants milk is optional at supper. All participants must still select at least three different food components for lunch or supper.

Sponsors must be approved by ODE CNP to use OVS before implementing this meal service style.

Offer Versus Serve Requirements

Breakfast

When using OVS at breakfast, at least the following four food items, in the required minimum serving sizes, *must be offered*:

- A serving of milk
- A food item from the fruit or vegetable component
- A food item from the grain component
- A food item from the meat/meat alternate or one additional item from the fruit or vegetable component or grains component

A participant must take at least three different food items from any of the food items offered. The food items selected may be from any of the required components and must be in the required minimum serving sizes.

The participant must take at least three different food items. Food items selected must be in the required minimum serving sizes.

Note: All food items must be different from each other. For example: two cereals cannot be served, but cereal and toast can be served.

Lunch/Supper

When using OVS at lunch or supper, at least one food item from each of the following food components, in the required minimum serving sizes, required at lunch and supper *must be offered*:

- A serving of milk (optional for adults at supper only)
- A food item from the vegetable component
- A food item from the fruit component
- A food item from the grain component
- A food item from the meat/meat alternate

Note: all components must be offered, and a vegetable may not be substituted for a fruit in OVS. A participant must take at least three food components, rather than three items, to ensure the participant selects an adequately nutritious meal. For instance, a hamburger on a whole wheat bun and milk would count as a reimbursable meal. Alternatively, the participant may also choose to take broccoli, a pear, and milk for a reimbursable meal.

The ODE CNP [Offer Versus Serve in the CACFP](#) handout and the [Offer Versus Serve Examples](#) handout are helpful resources that can be used for training purposes. Additional information on Offer Versus Serve can be found in [CACFP memo 02-2025](#).

Section B – Special Situations

Meals Eaten at Another Location (Field Trips)

Meals served in the CACFP are intended to be consumed in settings where organized groups of eligible children and adults are gathered to eat. This means that meals must be consumed on-site in order for the meal to be reimbursable unless ODE CNP has approved for off-site consumption during field trips.

If meals are consumed off-site, such as during a field trip, sponsors must first receive ODE CNP approval to claim meals off-site. Failure to meet this congregate feeding requirement will result in the disallowance of meals and may lead to a determination of serious deficiency in the Program.

Meals or snacks served at an alternate location (e.g., field trip) provided by the sponsor and supervised by the sponsor's staff may be claimed for reimbursement. Sponsors must submit a request via email for all field trips by site to the assigned Child Nutrition Specialist at least 48 hours prior to the date of the field trip. The Specialist will provide verification of receipt of the field trip request and field trip approval via email.

Meals that are served off-site must meet CACFP meal pattern requirements to be claimed for reimbursement. The meals must be supervised, and a point-of-service meal count documented during the field trip.

Caution must be taken to ensure that potentially hazardous foods are stored and served according to local public health policies. Check with your county health officials to confirm the food safety requirements for transporting and consuming food off-site.

Meals packed by the sponsor and sent with a participant to eat at another location without the supervision of the sponsor's personnel are not eligible for CACFP reimbursement.

Meals purchased at restaurants or fast food establishments may not be claimed for reimbursement.

If sponsors have additional questions about meals served at locations other than an approved site, they should contact their assigned Child Nutrition Specialist.

Parent/Guardian Provided Components

Refer to the section on [Parent/Guardian Provided Components](#) in Chapter 9.

Sharing Tables

To avoid food waste, sponsors may designate a "sharing table" where food items participants do not want to eat may be placed for another participant to "share." These food and beverage items are then available to other participants who may want additional servings. The "sharing table" must be in a location that is beyond the

point-of service meal count position (e.g., separate from the end of the cafeteria line, or on another table if using restaurant style meal service).

Before implementing a “sharing table,” sponsors are responsible for contacting their local health department concerning policies regarding re-use of foods left on the “sharing table.”

Recycling of Meal Components from a Sharing Table

The recycling of served milk that is unopened and retrieved for re-service or the re-service of other items as a component of another reimbursed meal is permitted if such practice is not contrary to applicable State and local health codes. Sponsors are responsible for contacting their local health department concerning policies regarding which types of food items may be recycled for re-service.

If the practice of recycling meal components is extensive, appropriate measures should be taken to increase consumption through proper and appealing service, nutrition education and other means.

Section C – Developing Menus

When children are offered well-prepared foods in a variety of colors and flavors, they are more likely to taste, eat and enjoy them. Children who regularly consume a variety of foods also have a better chance of getting the nutrients needed for healthy growth and development. See the [Menu Monitoring Checklist](#) for some meal pattern requirements and best practice menu planning recommendations.

Cycle Menus

A cycle menu is a series of menus planned in advance, served for a specific time period, and then repeated. ODE CNP recommends cycles of four to six weeks. Some sponsors use a different cycle menu for each season of the year to include seasonal foods. For example, a summer cycle menu may include tomatoes, berries, melons, and other fruits and vegetables in season. Cycle menus save time and money by allowing menu planners to:

- Plan accurately
- Predict food costs
- Reduce waste
- Repeat grocery orders
- Vary meals

- Make food shopping and preparation more efficient

The Institute of Child Nutrition (ICN) has created a [Cycle Menu for Preschoolers](#) toolkit that can be used as a reference for starting your own cycle menu.

Section D – Menu Record Requirements

Sponsors must maintain menu records. All program records, including menu records and supporting documentation, must be kept for three fiscal years, plus the current fiscal year (October to September.) Menu records must show the sponsor is meeting Program meal requirements. Menu records must be on file for all meals claimed for reimbursement and must be made available to reviewers during Administrative Reviews. The following menu records are required:

Menus

Sponsors may have several different menus available. Most often, a sponsor will have a planned menu and a working menu. A planned menu shows what is scheduled to be served for the upcoming days or weeks. A working menu is the menu showing all actual food items served, including substitutions. A working menu must be saved for all meals and snacks claimed for reimbursement.

Working menus must show:

- Full date (month, day, and year) the meals and snacks were served
- Site name (location) if the Sponsor has more than one site
- The current USDA nondiscrimination statement (short version only)
- Actual food items served – for example “WG Bread,” “Apple,” “Cheese Pizza,” “Celery,” etc.
 - Milk type served for each age group
 - Whole grain-rich items are labeled
 - Breakfast cereals must include the name of the cereal
 - Yogurts must include the flavors served
- Substitutions made to the planned menu (see [Meal Substitutions](#))
- Substitutions made for disabilities or medical or other special dietary needs (see [Meal Substitutions](#))
- Recommended but not required: CP (Commercially Prepared) or HM (Home Made) notations for combination food items on menus provided to ODE CNP or USDA during an administrative review.

Milk

For all milk listed on the menu, document the percent of the fat content for the milk served for each age group next to the milk component on the working menu.

- When flavored milk is served to children ages 6 and older or adults, document the fat content of the milk served and the flavor served (i.e. fat-free, chocolate)
- When the menu is used for only one age group, then the statement below may be written at the top or bottom of the menu:
 - For ages 12-23 months: "All milk served is whole, unflavored milk"
 - For ages 2-5: "All milk served is 1% (or fat-free as applicable), unflavored milk"
 - For ages 6 and older or adults: "All milk served is 1% (or fat-free as applicable) unflavored or non-fat (or 1% as applicable) flavored milk". The Sponsor is required to document the flavor (chocolate, strawberry, etc.) of the milk on the working menu, when flavored milk is served for a meal or snack. Flavored milk may only be served to participants ages 6 and older or adults.
- When the menu is used for multiple age groups then a statement may be written at the top or the bottom of the menu:
 - "All milk served whole, unflavored milk for ages 12-23 months; 1%/fat-free unflavored milk for ages 2-5"
 - "All milk served is 1%/fat-free unflavored or 1%/fat-free flavored milk for participants ages 6-18 or adults"

Whole Grain-Rich Foods

At least one serving of grains per day must be whole grain-rich. More information about whole grain-rich determination can be found in [Chapter 9 Meal Pattern Requirements](#) under the section on [Crediting Grains](#). To demonstrate compliance with this requirement, sponsors must document whole grain-rich foods on the menu. Some examples of how to document this information is listed below:

- When **all** grains/breads listed on the menu are whole grain-rich items the following statement may be written at the top or the bottom of the menu:
 - "All grains served are whole grains"
- When all the grain/bread items listed on the menu are not whole grain-rich, then each individual grain/bread food item that is whole grain-rich must be documented as whole grain-rich next to the food item on the working menu. Some acceptable notations of whole grain-rich items are the following abbreviations:
 - "WG" or "WGR" for whole grain or whole grain-rich
 - "WW" for whole wheat

Breakfast Cereals

Breakfast cereals include ready-to-eat cereals and instant and hot cereals. Breakfast cereals must meet the sugar limit and be whole grain-rich, enriched or fortified to be creditable in the CACFP. When a breakfast cereal is served, name of the cereal served must be documented on the working menu. This is required to verify that the breakfast cereal meets the sugar limit. An example of documenting a breakfast cereal is "Cheerios."

Yogurt

When yogurt is served the flavor of the yogurt must be documented on the working menu each time yogurt is listed on the menu. This is required to verify that the yogurt meets the required sugar limit. An example of a yogurt that meets the sugar requirement is "Strawberry Greek Yogurt."

Meal Substitutions

Substitutions to the regularly planned menu must be documented. The documentation may be made on the working menu or on a separate document depending on the number and complexity of substitutions made.

The menu documentation should include:

- The date
- The meal or snack served
- The participant's name if the substitution is for a specific participant due to a disability or medical or other special dietary need
- The food item(s) substituted

Sponsors can contact their assigned Child Nutrition Specialist for further assistance in clarifying what documentation may be required for their program.

Sponsors can use the ODE CNP [One Month Menu Template](#) or create their own template. The ODE CNP [Documenting Your CACFP Menu](#) handout is a helpful tool to double check that working menus include all required documentation.

Infant Menus

Information on infant menu documentation can be found in [Chapter 11 Infant Meal Pattern](#) under [Section G - Infant Menu Recordkeeping Requirements](#).

Supporting Documentation

Additional supporting documentation may be needed for some food items to show that the items meet CACFP meal pattern requirements. Supporting documentation is

required for combination foods, whole grain-rich foods, breakfast cereals, yogurts, and tofu. All supporting documentation must be legible and current for items served. Supporting documentation must be saved for three years plus the current fiscal year.

Combination Foods

Combination foods are food items that contain more than one component, for example a meat loaf can contain both the grain component and the meat/meat alternate component, or food items that contain both creditable and non-creditable foods, such as hummus, which contains both creditable ingredients like chickpea, and non-creditable ingredients, such as water, oil, and spices.

Additional documentation is required for combination foods in order to verify crediting. The crediting documentation required will depend on whether the item is homemade or commercially prepared.

Homemade Combination Food Items – Using Recipes

Homemade combination foods are items that are made by the sponsor at an on-site kitchen. All homemade combination foods require recipes to support meal pattern contributions. Recipes must document:

- Name of recipe matching the item as listed on the menu
- All ingredients with weight or volume amounts (ounces, pounds, cups, etc.)
- The form of each ingredient (cooked, raw, chopped, shredded, etc.)
- Serving size of the finished product for each age group served
- Yield (total number of servings the recipe makes, or total measured amount such as 1 gallon, two 11" x 13" pans cut in 24 pieces, etc.)
- The meal component contribution (i.e., 2 oz. meat/meat alternate, 1 oz grains, ¼ cup vegetables or fruits)
- Child Nutrition (CN) labels, manufacturer's Product Formulation Statement (PFS), or Standard of Identity product labels for any commercial combination food used as an ingredient in the recipe (Example: Sloppy Joe made with pre-cooked beef taco crumbles)
- Complete instructions for the preparation and service of the food item

An optional [recipe form](#) (Word document) to document homemade combination food recipes is available from the [CACFP Meal Pattern and Menu Planning page](#). Recipes must also be available for any homemade combination foods served to infants.

Sponsors are encouraged to use pre-credited Child Nutrition Program recipes from the [Institute of Child Nutrition \(The ICN\) Child Nutrition Recipe Box](#). This website

contains USDA-credited recipes including the entire catalogue of [USDA Standardized Recipes](#) and all recipes from the [Recipes for Healthy Kids: Cookbook for Child Care Centers](#). With the ICN Child Nutrition Recipe Box, sponsors can search for recipes, check out ratings from other users, and save recipes. Sponsors who wish to create their own recipes can also use this recipe box as a starting point for ideas.

ODE CNP recommends sponsors use these recipes whenever possible.

Sponsors creating their own recipe must use the [USDA Food Buying Guide](#)'s to determine meal component contributions for each recipe. The Recipe Analysis Workbook (RAW) tool in the Food Buying Guide is a calculating tool that helps sponsors determine the meal component contributions by pulling data from food items used in the recipe for each component. Sponsors can also calculate meal component contributions by hand or with their own internal software. Sponsors can also use the USDA [Recipe Standardization Guide for the CACFP](#) for step-by-step instructions.

For additional information on food item crediting, see [Chapter 9 Meal Pattern Requirements](#).

Commercially Prepared Combination Food Items

Commercially prepared combination foods are items that are purchased already-made. Pre-made items must have one of the following: a Child Nutrition (CN) Label, a Product Formulation Statement (PFS), or a Standard of Identity/Food Buying Guide crediting.

Child Nutrition (CN) Labels

The Child Nutrition or CN labeling program is offered by USDA Food and Nutrition Service as a voluntary technical assistance program for food companies that manufacture combination meat and poultry products or fruit juice products containing at least 50% full-strength juice. CN labeled products are not typically found in neighborhood grocery stores but are available through food brokers and food service distributors. Large warehouse-type food stores may also carry some CN labeled products.

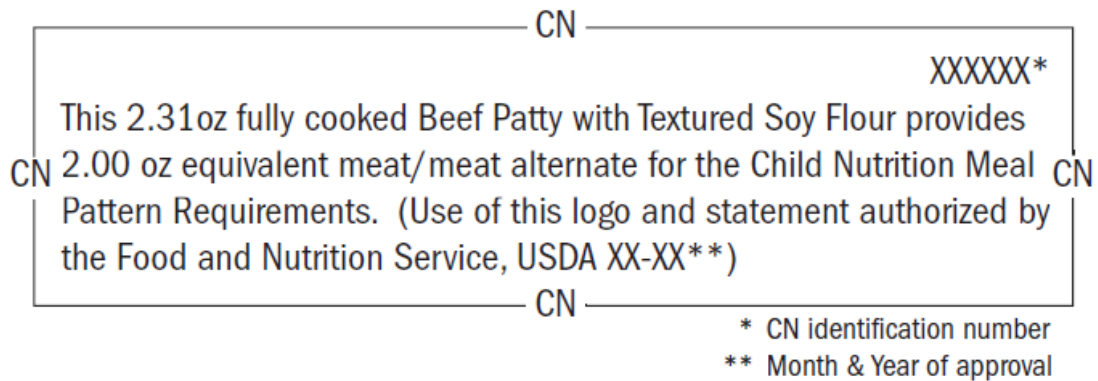
CN labeled food products always have a *CN logo* and a *CN label statement* printed on the product package. The *CN logo* is a distinct box around the CN label statement with the letters "CN" printed midway on each side of the box. (See Image: CN Label 1) The *CN label statement* is inside the box and includes the following information:

- The product identification number;

- A statement of the product's contribution toward meal pattern requirements, i.e. the statement will identify the contribution of a specific portion of a combination meat product toward the Meat/Meat Alternate, Grains/Breads, Vegetable and/or Fruit component of the meal pattern requirements;
- A statement that the product's CN labeling was authorized by USDA FNS; and,
- The approval date.

IMAGE: CN LABEL 1

A sample CN logo:



See [Appendix C of the Food Buying Guide](#) for more information about what the CN label tells you.

Sponsors are only required to keep one CN label for each CN labeled item that is on the menu regardless of the number of times the item appears on the menu. If a different brand of the same type of CN labeled menu item is purchased (e.g., breaded chicken patties) the sponsor must keep a CN label from the new brand as well as the CN label from the brand previously served.

The CN label statement on commercial food products carries a warranty, meaning that if the food item is used in accordance with the manufacturer's directions, the sponsor will not have an audit claim against it for the CN labeled product for noncompliance with the meal pattern requirements. The CN label is only valid when the label is attached to the purchased product.

Sponsors should be aware that product information on the CN label with a watermark can be changed. Therefore, sponsors are encouraged to verify that the CN label with a watermark came from a product that was purchased and accurately reflects that product. This helps to maintain the integrity of the CN Labeling Program by ensuring that the CN Label came from the actual product that was purchased.

CN labels will include a date with the most recent authorization for use of that label. This is different from the “Valid Until” date shown on the [CN Label Verification Report](#), which indicates when the current authority to use the label expires.

Additional information about the CN Label can be found on the [USDA CN Labeling Program page](#) and on the [CACFP memo 04-2025](#).

Sponsors may document CN Labeled products as outlined below:

Documenting CN Labeled Product Requirements

The CN Label is the gold standard for verifying the crediting of menu items and provides a warranty against audit claims when the product is used according to the manufacturer’s instructions. Acceptable and valid documentation for the CN Label includes:

- 1) the original CN Label from the product carton; or
- 2) a photocopy of the CN Label shown attached to the original product carton; or
- 3) a photograph of the CN Label shown attached to the original product carton.

CN Labels that are photocopied or photographed must be visible and legible.

Documenting Watermarked CN Label Requirements

If the original CN Label from the product carton, or the valid photograph or photocopy of the original CN label is not available, sponsors may provide the Bill of Lading (invoice) containing the product name and:

1. a hard copy of the CN Label copied with a watermark displaying the product name and CN number provided by the vendor; or
2. an electronic copy of the CN Label with a watermark displaying the product name and CN number provided by the vendor.

When a valid CN Label or watermarked CN Label with Bill of Lading is provided, ODE CNP will not request additional crediting information such as a manufacturer’s Product Formulation Statement (PFS). The PFS will only be requested when reviewing a processed product without a CN Label.

Note: Some CN labeled food products require a very large portion size to meet minimum Meat/Meat Alternate meal pattern requirements. For this reason, some CN labeled food products may not be good menu items for Child and Adult Care Food Programs serving young participants. Be sure to check CN labels for serving sizes to determine if the product is suitable for your Program.

Product Formulation Statement (PFS)

Commercially prepared combination foods without CN Labels or the original product label showing the product meets USDA Standards of Identity must have a completed and signed PFS on the manufacturers' letterhead that demonstrates how the commercially prepared combination food contributes to the meal pattern requirements.

A PFS must be an *official product analysis sheet* from the food manufacturer, not an analysis or a product specification sheet from a salesperson. The PFS for a commercially prepared combination food product must include:

- A list of all ingredients, i.e. grain products must be specified whole grain or enriched;
- The *ingredient weight* per serving of each ingredient to be credited;
- The weight of the creditable ingredients specified as raw or cooked weight; and,
- The weight or volume of the product serving size, or the number of pieces per serving.
- A signature of the manufacturer's representative stating the information provided is true and correct.

The manufacturer must indicate how the claimed credit was determined. It is never acceptable for a manufacturer to simply state that the product provides a certain amount of credit for the child nutrition meal pattern. For example; fruit filled pancakes may not provide meat/meat alternate because it is not clear how the product contributes to the meat/meat alternate component.

USDA has developed a handout called the [Tips for Evaluating a Manufacturer's Product Formulation Statement](#) that covers the basic requirements for a PFS. This resource and additional helpful resources on PFS, CN labels, and documentation requirements for Alternate Protein Products (APP) can be found on the [Manufacturer Documentation: Child Nutrition Labels and Product Formulation Statements](#) page.

Standard of Identity Product Labels

A *Standard of Identity* has been established by USDA for some commercial combination food products. A *Standard of Identity* specifies all ingredients and their quantities in order for a product to bear a *specific name*. For example, if a product is named "Chile con carne," which has a standard of identity, all chili con carne products will have the same primary food ingredients in the specific quantities required. The [Food Buying Guide for Child Nutrition Programs \(FBG\)](#) provides meat/meat alternate crediting information for some standardized combination foods.

Crediting information is provided for the meat/meat alternate component only and has been summarized from the FBG for Sponsors on the [Standard of Identity Chart](#). The list is inclusive of all USDA evaluated products, except for combination fish products because breaded fish products do not have a *Standard of Identity* and may not be credited without a CN label or an PFS. To credit the product for a second component, sponsors must obtain a Manufacturer's Product Analysis Sheet from the manufacturer that documents the quantity of the other meal pattern component per serving.

To credit commercial combination foods in the CACFP meals without a CN label or PFS and using a Standard of Identity, the following requirements must be met:

- The name of the food on the product label must *exactly* match the name of the product listed in the FBG or on the summary list.
- Sponsors must maintain on file an actual product label or a photocopy of the product label that shows the product name exactly matches the name in the FBG on the summary list.
- The product is credited toward the meat/meat alternate component only.

Note: The product portion size needed to fulfill the minimum meat/meat alternate requirement for some items may be unreasonably large for the age group served. Sponsors may choose to not serve the product or may serve a smaller portion with an additional meat/ meat alternate food item that, together, provides the full minimum quantity required.

Whole Grain-Rich Foods Supporting Documentation

For most grain items, the only supporting documentation that will need to be saved is the ingredient label with the manufacturer's name showing that the first ingredient is a whole grain and that second and third grain ingredients, if present, are creditable grains. The sponsor may keep the actual ingredient list with the manufacturer's name or they may keep a photograph or photocopy of the ingredient list with manufacturer's name.

Combination foods with grains might have a Product Formulation Statement or CN label, which can also be used to support a whole grain-rich claim.

Additional supporting documentation that can be used to support a whole grain-rich claim includes a current WIC list, having a product with a standard of identity labeled as "whole wheat" or having packaging with a FDA approved whole grain health claim. More information on determining whole grain-rich standards is available in the [Crediting Grains](#) section of this manual.

Breakfast Cereal, Yogurt, and Tofu Supporting Documentation

Breakfast cereals, yogurts, and tofu all require a Nutrition Facts label to support crediting.

For breakfast cereal and yogurts, the Nutrition Facts label is needed to show that the cereal is within sugar limit thresholds. Additional information on sugar limit thresholds is available under the section on [Crediting Breakfast Cereal](#) and [Yogurt](#).

Tofu requires a Nutrition Facts label in order to show that tofu meets the protein standard of 5 grams of protein per 2.2 ounces weight (1/4 cup by volume). Additional information on crediting tofu is available under the section on [Tofu](#) in [Chapter 9 Meal Pattern Requirements](#).

The sponsor may keep the actual Nutrition Facts label with the manufacturer's name and brand or they may keep a photograph or photocopy of the label.

Section E – Administrative Review Disallowances for Menu Record Deficiencies

During administrative reviews, ODE CNP Child Nutrition Specialists observe a meal service and examine menu records. When menu records are not available to support the meals claimed for reimbursement, those meals may be disallowed and the sponsor may be required to pay back reimbursements received for the disallowed meals. Menu record deficiencies resulting in disallowed meals can include:

- Missing date on menus or undated cycle menus
- Missing supporting documentation or incomplete menu records for all required meal pattern components for all meal types claimed
- Missing Child Nutrition (CN) Labels, Manufacturer's Product Formulation Statements (PFS) or Standard of Identity Product labels for commercial combination foods
- Missing nutrition facts labels to document the sugar content of ready-to-eat breakfast cereals or whole grain-rich products
- Missing recipes for homemade combination foods
- Food receipts do not clearly show that food items recorded on the menu were purchased during the time period covered by the test month for the administrative review

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Section A: Infant Meal Patterns

Overview

Infants are defined in the CACFP as participants aged 0 to 11 months of age. The day that a participant turns one year old, the participant is considered a child and will take part in the child meal pattern. Infants have unique nutritional needs and require a separate meal pattern that is based on the recommendations of the Dietary Guidelines of Americans (DGAs) and the American Academy of Pediatrics (AAP)

Offering Infant Meals

Sponsors who enroll infants or have infants in their care are required to offer infant meals to infants aged 0-11 months. Program regulations define an enrolled participant as one whose parent or guardian has submitted to an institution a signed document which indicated that the participant is enrolled in child care ([7 CFR 226.2](#)). Centers may not avoid this obligation by not enrolling the infant in the CACFP or by citing logistical or cost barriers to offering infant meals.

Parents and guardians are allowed to decline the offered infant meals, including formula, and provide their own, however, this must be documented on the Child Enrollment Form (CEF) under the Infant Formula Selection section (see [Section G - Infant Menu Recordkeeping Requirements](#)) and on the infant menus.

Reimbursable Meals

Like the Child Meal Pattern (see [Chapter 9 Meal Pattern Requirements](#)), meals and snacks are reimbursable for infants when they meet all requirements, including:

- Claiming for a maximum of either two meals and one snack or two snacks and one meal per participant per day
- Serving at an ODE CNP approved site
- Serving an ODE CNP approved meal or snack type
- Serving to an enrolled participant (when applicable)
- Meeting all meal pattern, meal service, and menu documentation requirements

There are two different age groups in the infant meal pattern, the 0-5 months age group and the 6-11 months age group. Each age group has different meal pattern requirements based on the nutritional needs as recommended by the DGA and AAP.

For both age groups and in all food components, there is a range for minimum serving sizes. The range reflects the variances in infant feeding for each individual infant. While older infants are expected to consume larger portions and would typically have larger minimum serving sizes, the range provides flexibility to child care

providers so they can work with parents and guardians to provide portions that best suit each infant in care. The expectation is for all infants to receive the higher end of the range as they get older and become used to receiving the different solid components.

0-5 Months Old Infants

The only required component for infants aged 0-5 months is breastmilk or iron-fortified infant formula. 4 to 6 fluid ounces of breastmilk, iron-fortified infant formula, or both, is required for all meals (breakfast, lunch, and supper) and snacks.

Sponsors can work with parents and guardians who wish to introduce solid foods to their infants prior to 6 months of age. Solid food components may be served as allowable bonus food items prior to 6 months.

6-11 Months Old Infants

Once an infant turns 6 months, the serving size for breastmilk, iron-fortified infant formula, or both, increases to 6-8 fluid ounces for breakfast, lunch, and supper, and decreases to 2-4 fluid ounces for snacks. This reflects the growing appetite of older infants while allowing for the gradual inclusion of solid foods.

At 6 months, most infants start to become **developmentally ready** for solid foods. Once an infant is developmentally ready for solid foods, solid food components must be offered to the infant. The [Infant Meal Pattern Chart](#) provides the required components for infants in this age group. Additional information on serving solid foods to infants in this age group can be found in [Section D - Serving Solid Foods](#).

Meal Times and Responsive Feeding

Infants do not eat on a strict schedule; therefore, sponsors do not need to feed infants only at set meal times approved for older children. Instead, infants should be fed on demand, using **responsive feeding** guidelines where infants are fed when they show signs of hunger. In some situations, parents or guardians may provide written instructions for the infant to be fed on a strict schedule and that is also allowable. In all cases, sponsor staff are encouraged to work with parents and guardians to figure out a feeding plan that works for the infants in their care.

Common infant hunger and fullness signs can be found in the [Feeding Infants in the CACFP Manual](#) in Chapter 1. Some common hunger signs include rooting, opening, and closing the mouth, and reaching or pointing to the food.

Sponsor staff must never force an infant to finish what is in the bottle, bowl, or plate. The leftover components may be served at a later time if it was not touched, or it can

The fully accessible version of this chart is available on the [CACFP Meal Pattern Page](#)



Child and Adult Care Food Program (CACFP) Infant Meal Pattern

- Infants should be fed on demand when they show hunger signals
- Sponsors must offer at least one reimbursable iron-fortified infant formula (IFIF)
- The tables below list minimum serving sizes to meet meal pattern requirements

Abbreviations:

Fl. oz. = Fluid Ounces
Oz. eq. = Ounce Equivalent
Oz. = Ounce (weight)
Tbsp. = Tablespoon

Breakfast, Lunch, and Supper:

Food Components and Food Items	Birth – 5 Months	6 – 11 Months
Breast Milk ¹ or Iron-Fortified Infant Formula (IFIF) ^{1,2}	4-6 fl. oz.	6-8 fl. oz.
Fruit or Vegetable ^{3,4} or a combination of both		0-2 Tbsp.
Iron-Fortified Infant Cereal (IFIC) ^{5,6} or Meat/Meat Alternates (MMA) ³ , including Meat, fish, poultry, whole eggs, cooked beans/peas, or Cheese, or Cottage Cheese, or Yogurt ⁷		0 – ½ oz. eq. (0-4 Tbsp.) 0-4 Tbsp. 0-2 oz. 0-4 oz. or ½ cup 0-4 oz. or ½ cup

Note: Iron-Fortified Infant Cereal (IFIC) is the only Grain item that is allowed at Breakfast, Lunch, and Supper. Infants that do not consume IFIC can be served a MMA item instead.

Snack:

Food Components and Food Items	Birth – 5 Months	6 – 11 Months
Breast Milk ¹ or Iron-Fortified Infant Formula (IFIF) ^{1,2}	4-6 fl. oz.	2-4 fl. oz.
Fruit or Vegetable ^{3,4} or a combination of both		0-2 Tbsp.
Iron-Fortified Infant Cereal (IFIC) ^{5,6} or Breads, Crackers, or Ready-to-Eat (RTE) Cereals ^{5,8,9} Bread, Tortilla, or Biscuit, or Waffle, Pancake, or English Muffin, or Savory Crackers, or Sweet Crackers, or RTE Cereals, Flakes or Rounds ⁹ , or RTE Cereals, Puffs ⁹		0 – ½ oz. eq. (0-4 Tbsp.) 0 – ½ oz. eq. 14 grams 17 grams 6 grams 7 grams 7 grams or 4 Tbsp. or ¼ cup 7 grams or 5 Tbsp. or ½ cup

Note: Breads, crackers, and RTE cereals are only allowed at Snack. MMAs can be served as a bonus item only.

¹ Breast milk or IFIF, or portions of both must be served. Serving breast milk, when available, is considered a best practice for infants from birth through 11 months.

² All infant formula must be FDA-regulated and iron-fortified with 1 mg of iron or more per 100 calories of formula.

³ A serving of this component is required once an infant is developmentally ready for solid foods. A combination of different food items within the component is allowed.

⁴ Fruit and vegetable juices, including 100% juices, are not allowed for infants.

⁵ All infant cereal must be iron-fortified (IFIC).

⁶ Grains must be one of the following: enriched meal/flour or whole grain-rich. Ounce equivalent serving sizes are used to determine the quantity of creditable grains. For more sample serving sizes on creditable infant Grains, refer to the [Feeding Infants Using Ounce Equivalents for Grains Worksheet](#).

⁷ Yogurt must contain no more than 12 grams of added sugars per 6 ounces. Refer to the [Yogurt Sugar Limit Wallet Card](#).

⁸ Grain-based desserts and refined grains do not count towards meeting the Grains component requirement.

⁹ Breakfast cereals must be whole grain-rich, fortified, or enriched, and contain no more than 6 grams of added sugar per dry ounce (no more than 21 grams Added Sugars per 100 grams of dry cereal). Refer to the [Cereal Sugar Limit Wallet Card](#) and the WIC Cereal List.

Additional Resources: [Feeding Infants in the Child and Adult Care Food Program \(USDA\)](#)

10/2024

This institution is an equal opportunity provider.

be discarded. Formula or breastmilk can be refrigerated and served within safe time frames (see [Section B - Breastmilk](#) and [Section C - Iron-Fortified Infant Formula](#)). Meals are still reimbursable even if the infant does not eat all components offered. As long as all the required food components are offered over the course of the day, the meals and snacks are reimbursable when all requirements are met.

Parent/Guardian-Provided Components

Parents and guardians may choose to provide specific food items for their infants. Same as the child meal pattern (see [Chapter 9 Meal Pattern Requirement](#)), parents and guardians are allowed to provide up to one component of a reimbursable meal for their infant. This can include breastmilk or iron-fortified infant formula, or it can include a solid food component.

Parents and guardians of infants with disability or medical-related meal accommodations may provide one or more components of a reimbursable meal as long as the sponsor provides at least one required component ([CACFP Memo 08-2017](#), see also Chapter 9 [Section E - Meal Accommodations and Modifications](#)).

Reimbursable and Non-Reimbursable Infant Meals

There are some parents and guardians who would like to provide one or more food items for their infants in care. Sometimes these meals are reimbursable and sometimes they are not. Look below and see which situations will be reimbursable (check mark) and which will not (x).

A guardian provides iron-fortified infant formula for a 3-month-old infant.



A parent provides an infant formula that is **not iron-fortified** due to parent preference.



A parent provides **both** breastmilk and an iron-fortified infant cereal for a 7-month-old infant.



A parent provides an FDA exempt infant formula for an infant with medical needs.



All parent or guardian components provided must be documented on the infant menu record as “PS,” which is short for ‘parent-supplied’ (see [Section G - Infant Menu Recordkeeping Requirements](#)).

Parents and guardians cannot be required or coerced to supply breastmilk, formula, or solid foods for their infants participating in the CACFP. All parents and guardians must be informed of the availability of a sponsor-provided iron-fortified infant formula via the Infant Formula Selection section on the Child Enrollment Form (see [Section C - Iron-Fortified Infant Formula](#)).

Infant meals claimed for reimbursement must contain all the required meal pattern components for the age of the infant served, whether supplied by the parent/guardian or supplied by the sponsor. This means that parent or guardian provided infant formulas must meet the requirements of FDA-approved iron-fortified infant formulas and solid foods served must meet all CACFP requirements for infant meal components unless a medical meal accommodation is required.

Section B: Breastmilk

Breastmilk is a creditable part of the CACFP meal pattern and the best source of nutrition for infants. Meals containing parent or guardian provided expressed breastmilk or when the parent or guardian directly breastfeeds the infant on-site are reimbursable, including meals when the infant is only consuming breastmilk.

All breastmilk is assumed to be parent provided and does not need the ‘PS’ label.

Handling Expressed Breastmilk Safely

The American Academy of Pediatrics (AAP) has updated guidelines allowing storage of expressed breastmilk for up to four days. This recommendation may vary if the breastmilk is to be fed to an infant that is either preterm and/or ill. The four-day guideline starts from the day the breastmilk was expressed and applies to breastmilk that has been continuously refrigerated. Refrigerators should be kept at 40° Fahrenheit (4° Celsius) or below. Previously-frozen breastmilk that is thawed and stored in the refrigerator should be used within 24 hours and should never be refrozen.

Expressed breastmilk provided by a parent or guardian should be properly identified and labeled with the infant’s name and the date the milk was collected. Breastmilk identified for a specific infant should only be served to that infant.

Breastfeeding Parents/Guardians On-Site

Parents and guardians are encouraged to directly breastfeed infants on site if they are able. It is a best practice for sponsors to provide a private, clean, and comfortable area for the parent or guardian to breastfeed. These meals are reimbursable for infants 0-5 months and for infants 6-11 months who receive additional solid foods once they are developmentally ready. The amount of breastmilk directly provided to the infant when a parent or guardian breastfeeds on site does not need to be recorded.

On site is defined as being within the premises of the site, which can also include a car in the parking lot of the site. Having parents breastfeed in the parking lot is not encouraged, but can be counted as a reimbursable meal ([CACFP Memo 06-2025](#)).

Section C: Iron-Fortified Infant Formula

Requirement to Offer Formula

Sponsors are required to offer at least one type of iron-fortified infant formula ([7 CFR 226.20\(b\)\(2\)](#)). This formula must be listed on the Child Enrollment Form (CEF) under the Infant Formula Selection section and parents and guardians of infants enrolled in care can choose to either accept the sponsor-provided formula or decline and supply their own breastmilk or formula. Sponsors are not required to provide more than one approved infant formula. The sponsor formula must be available at the site and must meet all requirements for creditable infant formulas.

Sponsors may change the infant formula provided due to availability or preference. It is best practice to notify families of the change in formula ahead of time and to update the CEF with the new infant formula as soon as the changes are made. It is recommended for sponsors to document parental acknowledgement of any formula changes for infants. This can be done on the CEF or on another form.

Creditable Infant Formulas

A creditable infant formula is one that meets the Food and Drug Administration's (FDA) definition of iron-fortified infant formula, which is one that contains at least **1 milligram or more of iron** for every 100 calories of formula when prepared according to the label. This information can be found on the Nutrition Facts label of every infant formula.

Iron-fortified infant formulas must also meet the FDA definition of an infant formula ([CACFP Memo 06-2025](#)). This means that the formula must meet all FDA regulatory

standards including nutrient and safety standards. What this means in practice is that **the formula must be approved to be sold in the United States.** Infant formula purchased from a reputable in-person retailer or online vendor will be FDA-regulated.

Previously, all FDA-regulated infant formulas were required to be made in the United States, but infant formula shortages in 2022 were addressed by allowing imports of specific infant formulas ([CACFP 01-2023](#)). The FDA maintains a list of approved imported infant formulas on their [Companies That Received a Letter of Enforcement Discretion for Regular/Specialty Formulas](#) webpage.



NUTRIENTS per 100 Calories (5.3 fl oz)

PROTEIN 2.07 G CARBOHYDRATE... 11.2 G
FAT 5.40 G WATER 141 G

VITAMINS

VITAMIN A..... 300 IU	VITAMIN B ₆ 63 MCG	BIOTIN..... 4.6 MCG
VITAMIN D..... 75 IU	VITAMIN B ₁₂ 0.26 MCG	VITAMIN C (ASCORBIC ACID)..... 9 MG
VITAMIN E..... 1.5 IU	NIACIN 1100 MCG	CHOLINE 24 MG
VITAMIN K..... 8 MCG	FOLIC ACID (FOLACIN)..... 16 MCG	INOSITOL..... 4.9 MG
THIAMIN (VIT. B ₁) 100 MCG	PANTOTHENIC ACID 470 MCG	
RIBOFLAVIN (VIT. B ₂) 160 MCG		

MINERALS

CALCIUM..... 82 MG	ZINC..... 2 MCG
PHOSPHORUS 44 MG	MANGANESE..... 25 MG
MAGNESIUM..... 6 MG	COPPER..... 110 MG
IRON..... 1.9 MG	68 MG

The top of the label will show the serving size

Check that there is at least 1 mg (milligram) of iron

Soy-based, low lactose, and lactose-free formulas are creditable in the CACFP as long as they meet the iron-fortification and FDA-regulated requirements.

The [Creditable Infant Formulas](#) handout provides guidance on what it means to be FDA regulated and iron-fortified. ODE and USDA do not maintain lists of approved infant formulas due to the rapid shift in infant formula products. Sponsors must double check that all formulas are creditable prior to service and it is recommended to re-check Nutrition Fact labels periodically to ensure that formulas served are still meeting crediting requirements.

Families may choose to decline the sponsor-provided formula and bring their own. In order for the infant meals to be claimed for reimbursement, the parent or guardian must provide a formula that is creditable, unless the infant has a medical meal accommodation.

All formula must be prepared using the instructions on the formula label in order to be creditable.

Non-Creditable Infant Formulas

Infant formulas that do not meet the iron-fortification criteria (having less than 1 milligram of iron for every 100 calories of formula) or are not FDA-regulated are not creditable.

In addition, there are some formulas that are FDA exempt. **FDA Exempt Infant Formulas** are special formulas that are meant only for infants with unusual medical or dietary restrictions. The list of [FDA Exempt Infant Formulas](#) is maintained on the linked webpage. These formulas are also not creditable unless the infant has a medical meal accommodation and a Medical Statement is on file (see Chapter 9 [Section E – Meal Accommodations and Modifications](#)).

Homemade formulas are also non-creditable due to the lack of safety oversight.

Milk in any form is not considered a valid infant formula and may not be served to infants without a completed Medical Statement showing that a medical meal accommodation is needed.

Handling Infant Formula Safely

Infant formulas prepared from powder must use a safe water source and must be prepared using the instructions provided on the infant formula label.

Prepared formula should be used within 2 hours of preparation or refrigerated at 40° Fahrenheit (4° Celsius) and used within 24 hours. Once an infant starts feeding, the bottle must be consumed within 1 hour. Any leftover formula must be thrown away after 1 hour.

Formula must be kept in a cool, dry, indoor location and should not be stored in a refrigerator, freezer, vehicles, garages, or any outdoor locations. Check that formulas are not expired before using. Dented, bulging, leaking, or rusty containers must not be used and should be tossed.

The Oregon Department of Early Learning Care (DELC) requires child care centers to have written health policies and procedures covering the service of formulas, storage, handling of bottles, and the feeding of infants ([Rules for Certified Child Care Centers](#): 414-300-0030 (13)(f)). Sponsors must comply with all safe handling requirements of formula specified by DELC including testing for lead in water used for formula (414-300-0205(1)(a)).

Section D: Serving Solid Foods

Solid foods, also known as complementary foods, are non-formula/non breastmilk foods served to infants and can include a mixture of textures, including chopped and pureed foods. The Dietary Guidelines for Americans (DGA) recommends delaying the introduction of solid foods until 6 months of age or until infants are developmentally ready for solid foods. While some infants may show signs of readiness for solid foods, it is not recommended to introduce them before 4 months of age. The American Academy of Pediatrics (AAP) recommend introducing solid foods around 6-8 months, which is a critical period of development. Generally, by 7-8 months, most infants should be consuming solid foods from all food groups.

Developmental Readiness for Solid Foods

There is no single, direct signal to determine when an infant is developmentally ready to accept solid foods. Developmental readiness varies from infant to infant and can include markers such as reaching for food or opening mouths when food is around, being able to sit in a chair with good head control, being able to use the tongue to move food from the spoon to the mouth and having doubled their weight or weighs about 13 pounds or more. Most infants become developmentally ready around 6 months of age. The [Feeding Infants in the CACFP Manual](#), Chapters 1 and 6 provide additional guidelines for developmental readiness.

Sponsors should be in communication with infants' parents or guardians regarding when and what solid foods should be served while the infant is in care. Best practice is to have the parent or guardian request in writing when they want solid foods to be served to their infants in care.

Once an infant is determined to be developmentally ready for solid foods, it is recommended that foods are introduced gradually, with new foods introduced one at a time. During this time, an infant's eating pattern may change from week to week and meals and snacks for infants may be reimbursable even if some solid food components are not served to the infant.

Solid foods should be appropriate based on the infant's age and development and Sponsor staff must take care to avoid choking hazards (see [Reducing the Risk of Choking in Young Children at Mealtimes](#) handout).

On occasion, parents or guardians may not want their infants to start on solid foods despite signs of developmental readiness. In such cases, sponsor staff should notify families of the signs of developmental readiness that they have observed and engage in a conversation with the families on a timeline to start solid foods. The center should respect the parent or guardian's decision on when and how to feed their infant. Meals

are still reimbursable within the infant meal pattern if the parents or guardians choose to not start solid foods.

Required Solid Food Components

Once a 6-11 month infant is ready for solid foods consistently, the following solid food components will be required:

Breakfast, Lunch, and Supper:



0-2 Tbsp Fruit or Vegetable or combination of both

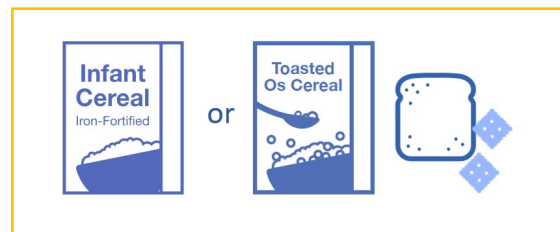


0-4 Tbsp Iron-Fortified Infant Cereal (IFIC) or Meat/Meat Alternate

Snacks:



0-2 Tbsp Fruit or Vegetable or combination of both



0-4 Tbsp Iron-Fortified Infant Cereal (IFIC) or ½ oz. eq. Breads, Crackers, or Ready-to-Eat

Although the minimum serving size starts at 0 Tablespoons (Tbsp), the amount required will move towards the top of the range once an infant is consistently ready for that component. This means that when an infant is consistently eating fruits and vegetables, the infant must be offered 2 tablespoons of fruits or vegetables for all meals and snacks.

Meat and Meat Alternates are only creditable in the infant meal pattern at breakfast, lunch, and supper. **Breads, Crackers, and Ready-to-Eat (RTE) Cereals are only creditable in the infant meal pattern at snacks.** The [Feeding Infants Using the Ounce Equivalents for Grains in the CACFP](#) worksheet provides a chart of ½ ounce equivalent (oz. eq.) portions for breads, crackers, and RTE cereals.

Iron-fortified infant cereal (IFIC) is distinct from ready-to-eat cereals and infant puff cereals due to their smooth texture and higher levels of iron-fortification. Foods that are high in iron, like IFIC or pureed meats or poultry, are especially important for breastfed infants since infant iron stores run low around 6 months of age. This is why IFIC cannot be substituted with ready-to-eat cereals in breakfast, lunch, or supper meal patterns.

Crediting requirements in the infant meal pattern is similar to the Child Meal Pattern (see Chapter 9, [Section C - Crediting Meal Components](#)), including the requirement for ready-to-eat cereals to meet sugar limits of no more than 6 grams of added sugar per dry ounce. However, there are some differences that should be noted.

- Whole grain-rich requirements do not apply to the infant meal pattern, but grains must be made of whole grain or enriched ingredients.
- Snack-time grain items are limited to breads (including all non-grain based desserts listed in Groups B and C of [Exhibit A](#)), crackers, and ready-to-eat cereals only.
- Rice, pasta, and quinoa are not creditable at all in the infant meal pattern.

Combination Infant Foods

Combination foods are items that have a mix of different ingredients from different food components. In the infant meal pattern, combination foods should only be served to infants who are consistently eating solid foods and are accepting foods from a variety of food components.

Since infants receiving combination foods are developmentally ready and accepting of each food component, the combination foods served must meet the full required amount of the meal component or other foods must be offered to meet the full required amounts. This might mean that an 8-month old infant receiving meatloaf must be offered enough meatloaf to make up at least 4 tablespoons of creditable meat/meat alternate (M/MA). If the meatloaf portion does not contain enough M/MA to meet the full serving size, then additional M/MA items must be provided. The infant is not required to eat all the items offered.

Infants benefit from being introduced to a variety of food textures, aromas, and flavors that are present in mixed dishes. When considering food combinations, be sure that the infant has been introduced to all ingredients, that the food is the appropriate texture to prevent choking, and that the food is not high in added sugars, fats, or sodium. Some combination foods may contain ingredients that do not credit towards the infant meal pattern, such as rice or pasta.

Combination foods may be available as jarred, pouched, or other packaged baby foods or they may be homemade or processed combination foods like those served to older children.

Combination foods will require additional supporting documentation in order to show crediting. Additional information on supporting documentation is available in [Section G - Infant Menu Recordkeeping Requirements](#).

Non-Creditable Infant Foods

There are some foods that are not creditable for infants that may be creditable for the child and adult meal patterns.

Milk, any fat percentage	All fruit and vegetable juice	Farina or grits
Cheese products	Honey*	Quinoa
Nuts and nut butters	Pasta	Oatmeal
Seeds and seed butters	Rice	

*This includes any food products with honey, including honey graham crackers or honey baked ham. Honey is sometimes contaminated with *Clostridium botulinum* spores that can produce a toxin and severe foodborne illness in infants whose immune systems are not fully developed.

Foods that are not creditable for the child and adult meal patterns will also be non-creditable for the infant meal pattern. This includes items listed in the [Non-Creditable Food List](#) and also includes jarred baby desserts, homemade canned foods, and freeze-dried yogurt snacks.

Section E: Meal Accommodations

Meal accommodations for infants follow the same rules as the child meal pattern. Refer to Chapter 9 [Section E - Meal Accommodations and Modifications](#) for an overview of medical or disability-related requests and non-medical requests.

Same as the child meal pattern, sponsors are required to make substitutions to meals for infants when the accommodation is due to a medical need or disability.

Infants who require [FDA Exempt Infant Formulas](#) or cow's milk must have a Medical Statement on file showing that the item is due to a medical need.

Section F: Transitional Period

A one month period, between 12 and 13 months, is allowed for infants to transition from infant formula to cow's milk. Meals and snacks containing infant formula served to 12 month old participants qualify for reimbursement without a Medical Statement.

Once a child turns 13 months, meals with formula will only be reimbursable if there is a medical need which is supported by a Medical Statement on file.

Breastmilk provided to infants and children of any age can be counted towards a reimbursable meal. Note that the breastmilk, the appropriate formula or milk, or a combination of both must be served in the full serving size required for the age group.

Section G: Infant Menu Recordkeeping Requirements

Sponsors have specific recordkeeping requirements for infants in care. These requirements include keeping daily infant menus and supporting documentation.

Daily Infant Menu Records

Due to the variance in infant diets, sponsors are required to keep separate menus for infant meals. Daily infant menu records must record the food items served for each individual infant. These menus must include:

- The infant's name
- The date of birth
- The menu date
- The type of meal (breakfast, lunch, supper, or snack)
- The name of the formula or breastmilk
- All additional actual food items served
- 'PS' notation if a food item is supplied by the parent or guardian

ODE CNP has created a daily infant menu template for infants [0-5 months](#) and infants [6-11 months](#). These templates are also available in Spanish ([0-5 months/6-11 months](#)). Instructions on completing these records are available in the [Infant Menu Record Instructions Handout](#).

These templates include columns where sponsor staff can check off meals or snacks that are complete and reimbursable. Sponsors who would like to use their own daily infant menu templates should submit a copy of the template to their assigned Child Nutrition Specialist to ensure that the templates include all required information.

Supporting Documentation

Depending on the items, supporting documentation might be required to show that items served meet all crediting requirements. Items that will need supporting documentation are listed below.

- **Infant formula:** Packaging must be saved showing that the formula meets FDA approval and iron-fortification requirements (see [Section C – Iron-Fortified Infant Formula](#)).
- **Breakfast Cereals:** Nutrition Fact Labels must be saved showing that the sugar limit of no more than 6 grams of total or added sugar per dry ounce is not exceeded.
- **Yogurt:** Nutrition Facts Label must be saved showing that the sugar limit of no more than 23 grams of total sugar per 6 ounce weight is not exceeded or no more than 12 grams of added sugar per 6 ounces weight
- **Processed combination foods, including store-bought baby foods:** A crediting statement, product formulation statement (PFS), or Child Nutrition (CN) label must be saved showing that minimum serving size requirements are met.
 - Crediting statements are available on some packaged baby foods and will include the creditable ingredient listed on the container as a unit of volume (for example, 3 Tbsp of mixed vegetables or ¼ cup of apple puree). The [Crediting Store-Bought Combination Baby Foods in the CACFP](#) worksheet provides additional details and examples.
 - If crediting statements are not available on a packaged combination baby food, a PFS or CN label must be on file in order to credit the combination food for any component.

Documenting Missing Solid Components

In situations where infants who are older than 6 months old who are not yet developmentally ready for solid foods or have a parent/guardian who requests that solid food intake is limited, it is considered best practice for sponsor staff to document the conversations with the parent/guardian with:

- The date of the conversation
- Name of infant
- Which solid foods are affected, ex. no nuts or no dairy
- Whether there is a time limit for the restriction, ex. no nuts for next two weeks pending doctor's visit to allow re-introduction

One Month Enrollment Roster (OMER) and Child Enrollment Forms

Sponsors must include all enrolled infants in the One Month Enrollment Roster (OMER) regardless of whether the infant's meals are claimed for reimbursement.

All participants in CACFP must have a completed Child Enrollment Form (CEF) for CACFP, but families of infants must also complete the Infant Formula Selection section. Sponsors must fill in the brand of the iron-fortified infant formula that is provided and parents and guardians must check one of the boxes below to accept or decline this formula.

Claiming Infant Meals

Infant meals and snacks may only be claimed when the meals and snacks meet all reimbursement requirements and the infant has a completed Child Enrollment Form (CEF) with the Infant Formula Selection section completed on file.

Recommended best practice is to use the ODE CNP Daily Infant Menu Templates and have trained staff check off meals that are complete and reimbursable on a daily or weekly basis. Total reimbursable meals can be tallied on the Complete (Reimbursable) Meals and Snacks section at the bottom of the template.

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Section A - Offering the CACFP In a Non-Discriminatory Manner

Sponsors receiving CACFP reimbursement must follow USDA Civil Rights regulations which are intended to assure that benefits of the Child and Adult Care Food Program (CACFP) are made available to all eligible persons. This includes:

- Making every effort in recruitment and enrollment procedures to allow equal participation by all eligible participants and potential participants regardless of race, color, national origin, sex (including gender identity and sexual orientation), age, or disability.
- Distributing the Confidential Income Statements (CIS) and the Letter to Households and approving CIS in a way that is fair to all and does not discriminate based on race, color, national origin, age, sex (including gender identity and sexual orientation), or disability.
- Serving meals in a way that allows equal participation regardless of race, color, national origin, age, sex (including gender identity and sexual orientation), or disability.

Discriminatory Practices

Discrimination is different treatment to any person which makes a distinction of one person or a group of persons from others, either intentionally, by neglect, or by actions or lack of actions, based on the protected classes. This can include when an individual or a group of individuals are:

- Denied a benefit or service that others receive,
- Delayed receiving a benefit or service that others receive,
- Treated differently than others to their disadvantage, and/or
- Affected by disparate impact (when seemingly neutral policies or other systems create a disproportionate impact on a protected class)

When individuals or a group of individuals in a protected class (race, color, national origin, age, sex - including gender identity and sexual orientation, or disability) inform, whether in person or in writing, that they have been discriminated against, it is the sponsor's responsibility to assist the complainants to report the alleged incident(s), investigate the incident in a fair and impartial manner, and to work with ODE CNP and/or the USDA to resolve the complaint.

Examples of discriminatory practices include:

- Refusing to allow an eligible child or adult to be enrolled based on his/ her disability

- Failing to provide participants with disabilities free and reasonable accommodations to receive benefits
- Serving meals at a place, time, or in a manner that discriminates based on race, color, national origin, sex (including gender identity and sexual orientation), age, or disability
- Selectively distributing CIS forms to only some households (for example, distributing CIS forms only to those households the sponsor thinks will qualify for Free or Reduced-Price eligibility)
- Failing to apply the same eligibility criteria to all potential participants
- Failing to provide materials that give persons with Limited English Proficiency full and equal opportunity to receive benefits

Obligation to Offer Infant Meals in the CACFP

All CACFP Centers must offer CACFP to all enrolled participants including infants. See [Chapter 11 Infant Meal Pattern](#) for more information on feeding infants on CACFP.

Section B – Collecting Racial and Ethnic Data

Collecting racial and ethnic data is required as part of the new sponsor and renewal application. The data is used to determine compliance with civil rights requirements. It must be collected and reported annually. Sponsors must maintain racial/ethnic data for three years plus the current fiscal year. All racial/ethnic data are confidential and should be stored in a way that protects each participant’s privacy. To collect and report racial/ethnic data, follow the steps below.

Racial and Ethnic Data information is required to be collected on the preliminary CACFP application, and annually thereafter.

Data must be collected **for each site** on the [Racial Ethnic Annual Data Collection Form \(CACFP only\)](#). Use one form for each site. This form can be found on [ODE CNP’s Civil Rights webpage](#) under the “Civil Rights Forms” heading. See the back of the form for Racial and Ethnic category definitions.

Collect the following information **for each site** on the form:

1. Determine and record the number of potentially eligible beneficiaries by the USDA racial-ethnic categories for the area served by each site. Sponsors may use the [county-level census data or other data from the United States Census website](#).
2. Collect actual participant data by racial-ethnic category for each CACFP site.

- a. Sponsors may collect racial/ethnic data of the participants from information provided on *Confidential Income Statements* by the household member completing the CIS, or through other enrollment documents
- b. Households are not required to provide racial/ethnic data. In instances where households do not provide this information, there is now an “Unknown” category on the Racial/Ethnic Data Form. However, sponsors must attempt to collect racial and ethnic data and cannot list all participants as unknown.
- c. Visual identification may **not** be used to determine a participant’s racial/ethnic category. Sponsors that do not distribute CIS or other enrollment forms requesting racial/ethnic information must use another method to collect racial/ethnic data, such as parent/guardian surveys or aggregate data. Sponsors may refer to [USDA Memo CACFP 11-2021, SFSP 07-2021](#), [USDA Memo CACFP 09-2022, SFSP 05-2022](#), and [USDA Memo CACFP 12-2024](#) for additional guidance on collecting Racial and Ethnic data.

Once the Racial Ethnic Annual Data Collection Form has been completed, it is to be maintained with all documents for three years plus the current program year. The form does not need to be sent to ODE CNP; however, the form must be made available upon request to ODE CNP.

Section C – Public Notification: Program Availability, “...And Justice for All” Poster, Non-Discrimination Statement

[FNS Instruction 113-1](#), Section IX requires sponsors to have a public notification system to notify applicants, participants, and potential participants of program availability, complaint information, and nondiscrimination. See below for more information on each public notification topic.

Program Availability

Participants and potential participants must be notified of the availability of the CACFP. At the beginning of each CACFP fiscal year, ODE CNP sends out a statewide public media release listing all sponsors participating in the CACFP. The public notification describes program benefits and includes the USDA nondiscrimination statement. This meets USDA’s requirements for public notification of program availability.

News Media Notification

In addition to the ODE CNP annual public notification, sponsors may submit a public release to their local news media describing their specific program. Any news media release describing the CACFP must include the appropriate USDA nondiscrimination statement. The short non-discrimination statement may be read for internet, radio, and television public service announcements ([FNS 113-11 IX A 4 \(d\) \(3\)](#)).

Minority and Grass Roots Organizations

All CACFP sponsors are required to contact minority and grassroots organizations to recruit potential participants. Organizations to contact may include, but are not limited to, schools/colleges, early intervention programs, health care systems, childcare provider organizations, religious organizations, and community and cultural outreach programs ([FNS 113-1 IX B](#)).

Complaint Information

“...And Justice for All” Poster

Sponsors must inform applicants and participants of their right to file a complaint, how to file a complaint, and complaint procedures at the service delivery point.

To meet this requirement, sponsors must display the “...And Justice for All” poster in a prominent area at all sites, including the main office, to ensure parents, adult participants, and the general public can see and read it. The USDA relies on newly published posters to ensure consistency of printing. Therefore, posters must be the original, USDA-printed 11” x 17” version, and may **not** be copied or printed by the sponsor.

The PDF version of the poster is available to view on [ODE CNP’s Civil Rights webpage](#) and may **only** be used for reference purposes or for inclusion in training presentations. Sponsor-printed copies of the PDF poster do **not** meet the display requirement.

“...And Justice for All” posters may be ordered through the online [ODE CNP Material Order Form](#) (the link can also be found on [ODE CNP’s Civil Rights Page](#) under the “Civil Rights Resources for All CNP Sponsors” heading).

ODE CNP Contact Information

To file a Child Nutrition Programs complaint of discrimination with the State of Oregon, send an email to ODE.CNPCivilRights@ode.oregon.gov, or reach out to:

Director of Child Nutrition Programs,
Oregon Department of Education,
255 Capitol Street NE,
Salem, OR 97310
or call (503) 339-6821, (voice)
or (503) 378-2892(TDD).

Non-Discrimination Statement

The non-discrimination statement must be included on all published materials, including websites, that mention the CACFP or USDA.

Information that is directed to parents, employees, potential participants, or other public groups and that mentions the CACFP or USDA meals must also include the non-discrimination statement. Informational materials that require the statement include:

- Application forms
- Employee handbooks
- Enrollment forms
- Menus sent home or posted for public view
- Always require the nondiscrimination statement, even if USDA or CACFP is only implied.
- Newsletters
- Brochures
- Parent handbooks
- Print or broadcast advertisements
- Flyers
- Websites

The non-discrimination statement (NDS) has two formats—Long Form and Short Form. The *Non-Discrimination Statement - Long Form* must be used on all documents whose size permits including the full statement. At a minimum, the sponsor's website home page that mentions CACFP meals must include the full non-discrimination statement, or a link to it (FNS 113-1 IX A 4). For social media, it is recommended to pin the non-discrimination statement to the top or add it to the "About" section.

The *Non-Discrimination Statement—Short Form* may be used on documents that are too small to include the full statement (FNS 113-1 IX A 4(a)).

The non-discrimination statement must be in a font size that is equal to, or larger than, the majority of the text in any document, printed or electronic.

USDA Non-Discrimination Statement – Long Form

The box below contains the official USDA non-discrimination statement for Oregon. Paragraphs must be included verbatim on any document where the long form is required:

"In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**

U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or

2. **fax:**

(833) 256-1665 or (202) 690-7442; or

3. **email:**

Program.Intake@usda.gov

This institution is an equal opportunity provider.

USDA Non-Discrimination Statement – Short Form

Material that is too small to include the full non-discrimination statement may use the following abbreviated statement:

"This institution is an equal opportunity provider."

The statement must be listed in full and unaltered.

Section D – Complaint Procedure

Sponsors are required to develop and implement a written procedure to handle any discrimination complaint that may be received. Any person who believes he/she/they have been discriminated against in the CACFP based on race, color, national origin, sex (including gender identity and sexual orientation), age, or disability has a right to file a complaint within 180 days of the alleged discriminatory action. Complainants may choose to directly contact USDA with their complaint, they may notify ODE CNP, or they may notify the Sponsor of their complaint.

Sponsors must give complainants a [Civil Rights Complaint Form](#) to complete and document all potential complaints in a [Civil Rights Complaint Log](#). Complaints may be received verbally or in writing. If complainants complete a *Civil Rights Complaint Form*, they can return the completed form to the Sponsor, send it to ODE CNP, or send it to USDA.

Sponsors must forward all discrimination complaints received to the Oregon Department of Education within three working days.

The Civil Rights complaint should contain the following information:

- Name, address, telephone number of the complainant, if provided by complainant (complainants are not required to provide this information)
- Specific location and name of Sponsor or entity delivering the service or benefit
- The nature of the incident, action or method of administration that led the complainant to feel discriminated against
- The basis on which the complainant believes discrimination exists (race, color, national origin, age, disability, or sex – including gender identity and sexual orientation).
- The names, telephone numbers, titles, and business or personal addresses of those that may have knowledge of the alleged discriminatory action

- The date(s) during which the alleged discriminatory actions occurred or, if continuing, the duration of such actions

The Sponsor's written Civil Rights complaint procedure must describe:

- Where the Civil Rights Complaint Forms and Civil Rights Complaint Log will be kept at each site and at the administrative offices
- Who is trained on the Sponsor's Civil Rights procedure
- How Civil Rights complaints will be recorded in the Civil Rights Complaint Log
- Procedures for receiving and forwarding an alleged civil rights complaint. See ODE CNP's [Civil Rights Complaint Procedure under the Civil Rights Forms heading](#).

Section E – Civil Rights Training

All sponsor staff involved in CACFP functions must receive annual training on Civil Rights requirements. This includes "frontline staff" who interact with program applicants or participants, and supervisors of "frontline staff" (FNS 113-1 XI).

Initial and annual Civil Rights training topics must include:

- What is discrimination
- Collecting, recording, and use of racial and ethnic data
- Complaint procedures, including how to identify and handle a Civil Rights complaint
- Requirements for reasonable accommodation of persons with disabilities
- Requirements for language assistance
- Effective public notification systems, including where to display *And Justice for All* posters
- Compliance review techniques
- Resolution of noncompliance
- Conflict resolution, and
- Customer service

Sponsors may use the [Civil Rights Training for Staff Form \(CACFP Only\)](#) on ODE CNP's Civil Rights page under the "Civil Rights Forms" heading or they may develop one of their own. Sponsors are encouraged to use the training webinars on Civil Rights located on the [ODE CNP CACFP Civil Rights webpage](#) under the "Civil Rights Training" heading as part of their annual training. Sponsors must also train staff on their organization's specific Civil Rights procedures.

Section F- Equal Opportunity Public Notification

Recipients of Federal financial assistance must take reasonable steps to ensure meaningful access to their programs and activities by person(s) with limited English proficiency and persons with disabilities. Additionally, sponsors are required to notify applicants with disabilities and/or limited English proficiency of their right to free language assistance and accommodations from the sponsoring organization, which must be provided upon request ([DR 4300-003 Equal Opportunity Public Notification Policy](#)).

Notification of resources may be posted on the sponsor's webpage, included in enrollment information, or sent out via program communications to the public (see ODE CNP Memo "[Child Nutrition Civil Rights and Equal Opportunity Public Notification Policy](#)").

Primary factors to consider when determining reasonable steps for providing language services:

- Number or proportion in the eligible service population. The greater the number, the higher the need.
- Frequency of contact in the programs. The frequency with which sponsors have or could expect to have contact with an individual from different language groups seeking assistance. The more frequent the contact with a particular language group, the more likely enhanced language services in that language are needed.
- Importance of the service provided. The more important the activity, information, service, or program, or the greater possible consequences of the contact, the more likely language services are needed.
- Resources available and the costs involved. See below for more information on resources and costs.

A sponsor's level of resources and the costs that would be imposed may have an impact on the nature of the steps that should be taken. Smaller sponsors with more limited budgets are not expected to provide the same level of language services as larger sponsors with larger budgets. In addition, "reasonable steps" may cease to be reasonable where the costs imposed substantially exceed the benefits.

Resource and cost issues, however, can often be reduced by technological advances, for example:

- The sharing of language assistance materials and services among and between sponsors, advocacy groups, and Federal grant agencies;

- Where appropriate, training bilingual staff to act as interpreters and translators;
- Information sharing through industry groups;
- Telephonic and video conferencing interpretation services;
- Pooling resources and standardizing documents to reduce translation needs;
- Using qualified translators and interpreters to ensure that documents need not be “fixed” later and that inaccurate interpretations do not cause delay or other costs;
- Centralizing interpreter and translator services to achieve economies of scale, or;
- The formalized use of qualified community volunteers.

Sponsors should carefully explore the most cost-effective means of delivering competent and accurate language services before limiting services due to resource concerns. Large sponsors and those sponsors serving a significant number or proportion of LEP persons should ensure that their resource limitations are well-substantiated before using this factor as a reason to limit language assistance. Such sponsors may find it useful to be able to articulate, through documentation or in some other reasonable manner, their process for determining that language services would be limited based on resources or costs.

For further information about LEP, visit [the LEP Federal Interagency Website](#).

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Section A – Training Requirements

Federal regulations require the ODE CNP to provide training and technical assistance to CACFP sponsors. ODE CNP provides annual training for current sponsors and training for new sponsors and new staff.

CACFP sponsors are required to provide and document:

- Annual staff training
- New staff training

Sponsors are required to provide adequate training to all staff who are involved with CACFP operations and record keeping.

ODE CNP CACFP Annual Training

Each year the person(s) who is identified as the Food Program Coordinator in CNPweb and is responsible for administering or overseeing the CACFP must participate in the ODE CNP provided CACFP annual training. Additional responsible principals may also be assigned and required to complete annual training as needed.

Annual training assigned by ODE CNP is specific to the individuals listed in CNPweb as responsible principal contacts and must be completed by that individual. Other sponsor staff may participate in ODE CNP-provided annual trainings, but their participation will not contribute to the sponsor's completion of the annual training requirement. ODE CNP notifies sponsors of the dates and requirements for the mandatory annual training and provides registration information, if needed. Annual training will always include civil rights training, and may include changes in policy and procedures, program updates, and training on administrative review findings from the current fiscal year.

Per Federal regulations, all sponsors must complete ODE CNP CACFP annual training. If a sponsor does not complete annual training requirements or respond to ODE communication regarding annual training, the sponsor's agreement will be closed due to unresponsiveness. Failure or refusal of the CACFP Food Program Coordinator or other responsible principals to complete mandatory CACFP annual training may result in your organization being categorized as "seriously deficient" per Federal Regulation [7 CFR 226.6\(c\)\(3\)\(ii\)](#).

ODE CNP "New Sponsor" and "Returning Sponsor" Training

ODE CNP training sessions are available on the ODE [CACFP training webpage](#). These training sessions provide information on all basic CACFP administrative and

operational requirements.

New applicants to CACFP will be assigned all required training sessions for their program type as part of the application process.

For current sponsors, the training sessions provide immediate access to all training information for program operation. The training sessions may serve as a refresher for current staff or provide new staff with thorough training in the specific CACFP tasks that will be assigned to them.

Topics covered include administration of the CACFP, record keeping requirements, meal pattern requirements, and civil rights requirements.

Sponsor or applicant staff required to view the web-based training sessions include:

- Staff of organizations planning to apply for participation on the CACFP
- All owners of For-Profit organizations planning to apply for participation in the CACFP
- Current sponsors required by ODE CNP to view training sessions as part of corrective action required due to findings during an administrative review
- Current sponsors with a change of CACFP staff or staff in need of refresher training

Sponsor's Annual Staff Training

[7 CFR 226.16\(d\)\(2\)](#)

Sponsor officials, including Food Program Coordinator and other responsible individuals as listed on the *Sponsor Information Sheet* in CNPweb, are responsible for providing annual CACFP training to all pertinent staff who do not participate in the ODE CNP annual training.

All sponsor staff must be trained on civil rights requirements. In addition, pertinent staff that must be trained annually on specific CACFP duties include:

- Cooks and Assistant Cooks
- Teachers and Assistant Teachers who supervise and/or serve meals
- Staff that develop and plan menus
- Administrative staff who approve Confidential Income Statements, develop the OMER, and/or distribute and collect enrollment information
- Clerical staff who compile monthly meal counts and complete reimbursement claims
- Financial officers who document nonprofit food service
- Volunteers who are involved in the meal service

To determine staff training needs, review past training documentation, monitor a meal service, monitor record keeping, and read recent [ODE CNP memos and announcements](#) and correspondence.

Sponsors may use all training sessions and other training tools posted on the [ODE CNP CACFP training website](#). These trainings are meant to assist sponsors with their internal CACFP training. Sponsors with questions on trainings may contact their assigned Child Nutrition Specialist for more information.

Annual internal staff training is a *minimum* requirement. ODE CNP encourages sponsors to train staff more frequently or on an ongoing basis.

Additionally, ODE CNP periodically issues new or revised policy through memoranda and revisions to this manual that may require sponsors to provide additional training to staff during the year.

Sponsor Monitor Training-

[7 CFR 226.15\(e\)\(14\)](#)

Sponsor staff who perform site monitoring reviews require specific training annually that documents that they have been trained. Trainings must include the frequency and type of required facility reviews. Monitoring staff must also be trained on all areas required of a sponsor site monitoring review. See [Chapter 14 - Multi-Site Sponsors](#) for site monitoring review requirements.

Training Sponsor's New Staff

[7 CFR 226.16\(d\)\(2\)](#)

In addition to annual training, all sponsors must have a procedure for training new staff on CACFP requirements soon after they are hired. New staff should be trained prior to completing any CACFP tasks. To provide adequate back-up, more than one staff person should be thoroughly trained in each CACFP function.

Sponsors of multi-site programs must provide training to staff at new sites before claiming meals at those sites.

Training Documentation

[7 CFR 226.15\(e\)\(12\)](#)

All training must be documented with the following:

- The date (month, day, and year)
- Time (start and end)

- Location of training
- The name of the trainer
 - For trainings conducted virtually, name of the staff who developed the training content.
- The topics covered
- The names, positions, and signatures of staff in attendance
 - For staff attending training virtually, E-signatures, email certifications, or webinar attendance logs may be collected.

Sponsors may use the [CACFP Staff Training form](#) (Word document) to document staff training or they may develop a form of their own . If a sponsor chooses to develop their own form or training documentation, the sponsor-developed documents must contain all required information as outlined above. Sponsors may also utilize virtual/electronic training systems for conducting staff training if all of the required information above, excluding location, is documented.

ODE CNP has also developed Training Certificates ([Word/PDF](#)) with links to current trainings by chapter that can be used to assign trainings for site staff.

Training Topics

Minimum training requirements for staff assigned CACFP duties must include all information appropriate to each assigned task. The topics that may need to be included for any individual or group of employees are:

- Meal pattern requirements for the ages of participants
- Serving sizes for the different age groups
- How to serve meals to participants
- How and when to record attendance
- How and when to take point-of-service meal counts
- How to approve Confidential Income Statements
- How to develop the One Month Enrollment Roster (OMER)
- How to ensure meals provided by vendors meet CACFP requirements
- Meal service styles (family, restaurant, cafeteria, combination style)
- Civil Rights requirements
- Accommodating children with special dietary needs
- Menu planning
- Health and safety requirements

If a sponsor has infants in care, the following are required training topics for staff assigned:

CACFP duties for infants:

- Infant formula designation on Child Enrollment Form
- Meal pattern requirements for infants
- Recording daily menu requirements for infants
- How and when to record meal count for infants
- Creditable foods in infant meals

Recommended training topics for CACFP staff include:

- Sanitation requirements
- Encouraging healthy eating habits
- How to incorporate more whole grain foods, vegetables, and fruits into menus
- How to use menu production records to plan for meals and shopping
- Ways to encourage participant milk consumption
- Kitchen safety
- Developmentally appropriate physical activities for young children

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Multi-Site sponsors are required to comply with all CACFP requirements except those superseded by the program-specific requirements found in this chapter.

Section A – General Requirements

A sponsoring organization which sponsors two or more CACFP sites is a “multi-site sponsor.” All sponsoring organizations are entirely responsible for the administration of the CACFP in all of its sites. This responsibility cannot be contracted out to another entity. This includes School Food Authorities (SFA) agreements with Food Service Management Company (FSMC).

Site monitoring is a vital task and a requirement for all multi-site sponsors operating CACFP. Failure to comply with the site monitoring requirements may result in the sponsoring organization being declared seriously deficient in the operation of CACFP ([CFR 226.6\(c\)\(2\)\(ii\)\(F\)](#)).

When submitting an initial application for CACFP participation, sponsors of multi-site programs must complete a CNPweb *Add Site/Modify Site Form* (located on the CNPweb packet page) for each sponsored site. A site is generally defined as having its own physical address and/or requiring its own Oregon Child Care Licensing Division (CCLD) license. Multiple classrooms within one building are not considered separate sites. There are two types of sponsored sites:

- **Affiliated site** is a child or adult care center that is owned in whole or in part by a CACFP sponsoring organization.
- **Unaffiliated site** is a participating sponsored child or adult care center that is legally distinct from its sponsoring organization.

Sponsors with unaffiliated site(s) must comply with all requirements in this chapter, in addition to the requirements listed in [Chapter 15 Sponsors of Unaffiliated Sites](#).

Annual Budget

All sponsors, except for School Food Authorities, are required to submit a budget to ODE CNP each year during the renewal application process. ODE CNP may also request a budget revision when sponsors make significant changes to the Program. Sponsors must contact ODE CNP when there are changes to their CACFP operations (including adding or removing sites) to determine if a budget revision is required.

Affiliated and Unaffiliated Site Identification

Sponsors must identify on the CNPweb *Site Information Sheet* whether the site is 'affiliated' or 'unaffiliated.' All School Food Authority (SFA) operated sites are considered affiliated.

See [Chapter 15 Sponsors of Unaffiliated Sites](#) for more information.

Adding a Site

Sponsors may add new sites to their CACFP application at any time during the year. Sponsors may claim meals served at a new site when the following actions have occurred:

- All site staff have received CACFP training, and the training has been documented.
- A [pre-approval visit](#) has been conducted and documented for the new site.
- All required documents have been submitted to ODE CNP and approved by the assigned Child Nutrition Specialist.
 - It is important to submit the required documents to ODE CNP well in advance of the proposed start date. A Child Nutrition Specialist will notify the sponsor in writing of the approved claim start date, which will also be reflected in CNPweb on the *Site Info Sheet*.
 - Sponsors must submit to ODE CNP the following documentation to ODE CNP when adding new sites:
 - CNPweb *Add Site/Modify Site Form* (Located on the CNPweb Packet Tab). Download the form, complete the form, and submit it to ODE CNP per the instructions in the top right corner of the form. Once ODE CNP staff processes the form, the sponsor will be contacted to let them know they may populate the *Site Info Sheet(s)*.
 - The *Site Information Sheet* in CNPweb (online form) must be in *pending approval* status for ODE CNP to review and approve it.
 - [Site Pre-Approval Review](#) documentation, as requested by Specialist.

Additional Information regarding adding a new site:

- The site start date for the new site cannot be before the site Pre-Approval Review date or before the CNPweb *Site Info Sheet* is approved by ODE CNP
- SFAs are exempt from conducting a pre-approval visit for a new CACFP sites located within school buildings that currently operate the National School Lunch Program (NSLP) See [Chapter 16 At-Risk Afterschool Program](#).

- Other ODE CNP required documents such as a vended meal agreement, planned menu, or a Child and Adult Care Food Program (CACFP) Agreement Between Sponsoring Organization and Unaffiliated Child Care Center.
- The sponsor may not claim meals for reimbursement for the new site prior to the ODE CNP approval date on the *Site Information Sheet* in CNPweb. A revised CNPweb *Management Plan* with, at a minimum, the section on Site Monitoring completed
- A CACFP Annual Budget (SFAs Sponsors are exempt from this requirement). This form is found in CNPweb, on the Packet Tab, under Offline forms.
- The sponsor must also conduct a documented monitoring review within the first four weeks of CACFP operations at the new site(s). This review also fulfills the first (of three annual) required monitoring reviews for the site. This documentation will be kept on file with the sponsor, unless requested.

Documentation of staff training at the new site is not required to be submitted to ODE CNP, unless specifically requested. However, the sponsor must provide training to staff at the site who have CACFP duties, and the training documentation must be maintained by sponsor staff and available for review if requested by ODE CNP.

Single-Site Sponsors Who Become Multi-Site Sponsors

A single-site sponsor may wish to add one or more sites to its CACFP agreement, therefore becoming a multi-site sponsor. There are additional responsibilities for multi-site sponsors, which this chapter discusses.

For SFAs adding an At-Risk Afterschool site, or sites, please see [Chapter 16 At-Risk Afterschool Program](#) for specific information regarding becoming a multi-site sponsor in CACFP. SFAs must use the ODE CNP CACFP Site Monitoring template form and follow all other requirements for site monitoring provided in this chapter.

There may be situations where sponsors operate more than one CACFP program type at the same location, for example, a sponsor may operate both an At-Risk Afterschool Program and a Child Care at the same site. These are not considered multi-sites, but a 'split site.' To create a split site, click on the Add link under the Action column of the Applications tab in CNPweb.

Inactivating a Site

When a sponsor decides to inactivate a CACFP site, they must do the following:

- Submit a CNPweb *Inactivate Site form* (Located on the CNPweb packet page, under Offline forms). Follow the instructions in the top right corner of the page to submit the form to ODE CNP.

- Revise the *Site Information Sheet* in CNPweb for the site to be inactivated.
 - Revise the operating End Date to the last date of CACFP operation.
 - Check all claim months for which the site will not be operating.
- Enter a comment in the "General Comments" section at the bottom of the *Site Information Sheet* explaining the reason for the inactivation or closure and stating the last date on which reimbursable meals will be served.
- Submit the CNPweb online *Site Information Sheet* for approval in pending approval status

Section B – Site Monitoring Requirements

Sponsors with more than one site (multi-site sponsors) must conduct site monitoring reviews. Sponsors must use the current [ODE CNP Site Monitoring Report](#) form located on the [ODE CNP CACFP website](#). Sponsors must conduct reviews at all sites to determine compliance with meal patterns, recordkeeping, health, and safety standards and other CACFP requirements.

General Requirements

All multi-site sponsors must conduct site monitoring reviews for approved sites in CNPweb, meeting the following requirements:

- A minimum of three monitoring reviews per site must be completed within each fiscal year (between October 1 and September 30) **
- Two of the three reviews must be unannounced.
- At least one unannounced review must include a meal observation.
- No more than six operating months may elapse between reviews.
- Site staff may not monitor their own site they routinely work at.
- Sponsors must vary the timing of unannounced reviews, so they are unpredictable to sponsored sites.
- Sponsors are not required to annually review all meal services being claimed at each site, however, throughout the year the sponsor must review all meal service types claimed by the sponsor.
- The percentage of all reviews conducted by the sponsor at mealtimes must be roughly proportional to the percentage of each meal type claimed by its sites.
 - For example, if 20 percent of the meals claimed by the sponsor in the prior year were breakfasts, a sponsor is required to conduct roughly (not exactly) 20 percent of this year's reviews at breakfast.
 - ODE CNP will determine whether the sponsor has made a reasonable effort to monitor all of the meal services being claimed by its facilities during an administrative review.

** For Sponsoring Organizations and multi-site sponsors that are in good standing the following monitoring policy applies to sites and providers that operate less than 12 months out of the year.

1. Sponsored facilities that operate less than 12 months per year shall be reviewed, according to the following schedule:
 - a. Facilities operating 0 – 4 months out of the year must be reviewed one time.
 - b. Facilities operating 5 – 8 months out of the year must be reviewed two times.
 - c. Facilities operating 9 – 12 months out of the year must be reviewed three times.
2. If a serious deficiency is found at a facility, the sponsoring organization must review the facility a minimum of three times per year for three years after the serious deficiency determination.
3. If a serious deficiency is found in the sponsoring organization operations, all sponsored facilities must be reviewed a minimum of three times per year for three years after the serious deficiency determination.

SFAs that operate National School Lunch Program (NSLP) and the At-Risk Afterschool Meals and Snacks Program at the same site may conduct one of the three CACFP monitoring reviews for CACFP At-Risk Afterschool meal sites at the same time when conducting a NSLP site monitoring review. A CACFP meal service would not be observed during this review, however recordkeeping and facility observations would be conducted.

Sponsors must thoroughly train site monitors in CACFP requirements annually. The training must be documented, and the training records must be kept on file with the sponsor's training records.

All site monitoring must be completed by sponsor-employed staff. Sponsors may not contract out the site monitoring requirement to non-sponsor employed staff, such as contracted nutrition consultants, vendors, or Food Service Management Company (FSMC) representatives.

Pre-Approval Visit for New Sites

Multi-site sponsors must conduct a pre-approval visit for all new sites on or before the first day of CACFP operation. A new site is defined as a site which did not operate CACFP in the last fiscal year. Use the [Pre-Approval Report for CACFP Centers](#) form (Word document) to document the pre-approval visit. Note: School Food Authorities (SFA) are exempt from this requirement for sites in which operate the National School Lunch Program (NSLP) in a school building.

During the pre-approval visit, the sponsor is not required to observe a meal, however, they must visit the site, observe the facilities, and ensure all CACFP requirements are met. If any areas of non-compliance are found, the site cannot be approved to operate CACFP until the issues have been corrected.

The form must be fully completed, including the signature, position title and date signed for both the sponsor's monitor and the site representative.

1. Sponsors must follow up on any areas of non-compliance found during a site monitoring review to ensure the areas of non-compliance have been fully and permanently corrected. All follow-up reviews conducted must be documented to show the site is now in compliance. The Site Monitoring Report for CACFP form must state the time frame for any additional required follow-up required.

Health and Safety Violations

Although CACFP monitors do not routinely assess health and safety issues during their onsite reviews, they must still be trained to recognize conditions that pose an imminent threat to the health or safety of the participants. See Chapter 1, [Section C Health and Safety Requirements](#).

Five-Day Reconciliation

The five-day reconciliation process is an important aspect of a monitoring review and a vital tool for assuring Program integrity. As part of every review of a sponsored center, the monitor must reconcile and ensure consistency of three critical elements—enrollment*, attendance, and meal counts—for a consecutive five-day period.

***Note:** CACFP enrollment forms are not required for Outside School Hours Care Centers (OSHCC), Adult Day Care Centers, Emergency Shelters, or At-Risk Afterschool sites.

If the data is consistent, it is also likely that the site is keeping accurate enrollment and attendance records and correctly reporting the number of meals served each day. If the data is not consistent, the monitor must try to determine the reasons for the discrepancies and any corrective actions that would be needed.

The monitor must also determine whether any meals should be disallowed or an overclaim should be established. Meals should not be disallowed if there is a reasonable explanation for the inconsistency. As a part of the site monitoring review, the monitor must complete a review of five consecutive operating day's records for the current or previous month to determine whether the meal counts are accurate based on the attendance records and, if applicable, CACFP Child Enrollment Forms

(CEFs), for the five-day period. Five-day reconciliations are used to highlight problems in claiming procedures.

If the CACFP enrollment, attendance and meal count records are sent to the central office on a daily or weekly basis, the site monitor may conduct the five-day reconciliation as a “desk audit.” It is best practice to conduct some or all of the 5-day reconciliation onsite, if possible, to review any issues found with the site representative in person.

Before conducting the actual five-day reconciliation, complete the following preliminary steps:

- Evaluate the site’s enrollment records, and daily attendance records, to ensure that they are current and accurate.
 - If CACFP enrollment forms are not required, as in Outside School Hours Care Centers (OSHCC), Adult Day Care Centers, Emergency/Homeless shelters or At-Risk Afterschool sites, the meal counts would be reconciled using solely the attendance records.
- Compare the center’s total meal counts to its approved capacity, as listed in the CNPweb *Site Information Sheet*. Meal counts for any meal or shift (if shift care is provided) should not exceed licensed or approved capacity.
 - **Note:** Sponsors may use licensed capacity also, although licensed capacity is not a required element of reconciliation. The monitor examines licensed capacity as part of the normal onsite review of a day care home or center’s daily records. However, the Food and Nutrition Service (FNS) and ODE CNP strongly believe that a comparison of meal counts to licensed capacity is a best practice to identify and resolve problems in the claiming process.
- Compare the center’s total enrollment to its recorded daily attendance, to ensure that the number of participants in attendance does not exceed the number of participants enrolled. If attendance does exceed enrollment, for any day or for any shift (if shift care is provided), determine the source of error (i.e., inaccurate attendance records, missing enrollment forms) before completing the five-day reconciliation.
 - This step is not applicable for Outside School Hours Care Centers (OSHCC), Adult Day Care, Emergency/Homeless shelters and At-Risk Afterschool sites

To conduct the five-day reconciliation:

- If the site uses an actual daily meal count form (meals are recorded using the child’s name): Cross check the attendance records with the meal count records

for at least 10 percent of the number of participants enrolled at the site (no less than five participants). Compare the participants in attendance as listed on the daily attendance records to the meals and snacks claimed, as listed on the daily meal count forms, for the five consecutive day period selected for review. Only participants present during the meal times as approved on the CNPweb *Site Info Sheet* should have meal counts recorded for reimbursement.

- If the site uses a head count meal count form: Cross check the attendance records with the meal count records; compare the total number of participants present to the meals and snacks claimed for the five consecutive day period selected for review. There cannot be more meals claimed for reimbursement than participants present at the meal time for any particular day and meal. If the site has multiple classrooms, the five-day reconciliation must be conducted for a minimum of one classroom.

Do not use the day of the monitoring review as one of the test days for the 5-day reconciliation.

All sites:

- Sponsors must disallow any meals claimed for reimbursement that are not supported by attendance records or enrollment records, if required.
- Document all meals disallowed and required corrective actions to be taken on the Site Monitoring Report. All follow-up and corrective action taken must be documented on the Site Monitoring Report or attached to the form, which show the area of non-compliance was resolved
- Notify the appropriate staff if meal disallows are found so the disallowed meals will not be included in the monthly reimbursement claim.

The five-day reconciliation of attendance, enrollment, if applicable, and meal counts records conducted during site monitoring reviews does not replace the accuracy checks sponsors must complete to ensure the validity of the reimbursement claim prior to submission of the claim.

Vendor Contracts

If the sponsor purchases meals from a vendor, including a Food Service Management Company (FSMC), the monitor must check that the vended meals at each site comply with all CACFP requirements and that they are consistent with the executed Vended Meal Agreement or FSMC contract. FSMCs and other vendors cannot monitor the sponsor's sites or administer the CACFP. See [Chapter 8 Procurement](#) for more information on vendor and FSMC contracts.

Civil Rights

Civil Rights compliance must be checked during monitoring reviews. The monitor must note any areas of non-compliance observed and implement and maintain effective corrective action.

Follow-up Reviews for Issues Documented

If the monitor notes issues that need follow-up, a date for follow-up must be recorded on the original report, and the follow-up review must be conducted and documented with resolutions noted.

Review Averaging – Optional for Sponsors to Use

Multi-site sponsors may choose to adopt a review averaging policy; however, it is optional to use. Should a multi-site sponsor choose to use review averaging, it must first be approved by ODE CNP prior to implementation.

Review averaging allows sponsoring organizations to focus more monitoring efforts on sites that need additional oversight and less time on sites that have a documented history of CACFP compliance. Review averaging is conducted by averaging both total and unannounced reviews each year. A minimum of two reviews must be conducted at all sites. The third review for a site in good standing may be conducted at a site with either new staff or a history of non-compliance with CACFP requirements. Using review averaging, the site in good standing receives two reviews during the fiscal year and the site with new staff or a history of non-compliance receives four reviews.

For example: If a multi-site sponsor conducts one unannounced review of a facility in a year and finds no serious deficiencies, the multi-site sponsor may choose not to conduct a third review of the facility that year, and may make its second review announced, provided that the sponsoring organization conducts an average of three reviews of all of its sites that year, and that it conducts an average of two unannounced reviews of all of its facilities that year. When the multi-site sponsor uses this averaging provision, and a specific facility receives two reviews in one review year, its first review in the next review year must occur no more than nine months after the previous review.

Sponsoring organizations exercising the review averaging option must have a written monitoring schedule in place at the beginning of each Federal fiscal year that includes rationale as to why a facility may be receiving more or less than the required three monitoring reviews required. This schedule and plan must be approved by ODE CNP prior to the start of the fiscal year.

Tips for Successful Site Monitoring Compliance

Sponsors are encouraged to consider the following for successful site monitoring compliance:

- During CACFP application renewal, check with site staff to verify meal times and which meals and snacks are served. Inform staff that if any of the information changes during the year to notify the sponsor immediately.
- Create a timeline of planned announced and unannounced monitoring reviews. Be sure to add any new sites to the planned schedule, which must include the preapproval visit.
- Review the CACFP *Sponsor Management Plan* in CNPweb to ensure back-up staff for conducting monitoring are in place if the regular monitoring staff is unavailable
- Prepare all documents that will be needed for the review in advance, including the [Site Monitoring Report](#), which may be downloaded from the [ODE CNP CACFP webpage](#), located under CACFP Program Compliance.

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Sponsors of CACFP Unaffiliated Sites must comply with all CACFP requirements except those superseded by the Sponsors of Unaffiliated Sites-specific requirements found in this chapter.

Section A – General Requirements

Affiliated and Unaffiliated Site Identification

Sponsoring organizations must identify on the CNPweb *Sponsor Information Sheet* whether the site is ‘affiliated’ or ‘unaffiliated.’ The definitions as written in USDA FNS Instruction [796.2 Rev. 4 “Financial Management–Child and Adult Care Food Program](#) are:

- **Affiliated center** is a child or adult care center that is owned in whole or in part by a CACFP sponsoring organization.
- **Unaffiliated center** is a participating sponsored child or adult care center that is legally distinct from its sponsoring organization. Whether a sponsoring organization has affiliated, unaffiliated or a combination of both types of sites, the sponsoring organization is entirely responsible for administration of the CACFP operations in any combination of two or more sites.

School districts with unaffiliated sites are exempt from this requirement, and all sponsored sites are considered affiliated sites.

A for-profit organization is eligible to serve as a sponsoring organization for for-profit centers which have the same legal identity as the organization but are not eligible to sponsor for-profit centers which are legally distinct from the organization.

Sponsoring an Unaffiliated Site - Additional Responsibilities

Sponsoring organizations that plan to provide services to unaffiliated site(s) must:

- Complete and submit to ODE CNP the Child and Adult Care Food Program (CACFP) *Agreement Between Sponsoring Organization and Unaffiliated Site*. See [Section B – Unaffiliated Sites](#) of this chapter, *Agreements- Permanent Agreement Between Sponsor and Unaffiliated Site*.
- Submit a CACFP Centers Annual Budget to ODE CNP (Located on the CNPweb packet page) as a sponsor of unaffiliated sites
- Disburse funds to the unaffiliated sites within 5 days of the receipt of the reimbursement from ODE CNP
- Inform the unaffiliated sites they may directly enter into an agreement with ODE CNP instead of being an unaffiliated site with the sponsoring organization.

- Demonstrate a need for a new sponsor. This is shown by applying with at least one site that has not participated in CACFP for 12 months prior to the application.
- A sponsor of unaffiliated sites must obtain, retain, and make available the same information for each of the nonprofit sites it operates. Sponsors must obtain and maintain on file for each sponsored site:
 - A current and complete site application for each unaffiliated sponsored site. Copies of the site application must be maintained with the Program files, and copies sent to the site for its files.
 - *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site*
 - Articles of Incorporation, Assumed Name information
 - IRS 501(c)(3) tax-exemption (if applicable)
 - Organizational chart, and,
 - Governing Body Awareness Form – a form for nonprofit governing board to complete
- Each month sponsors of unaffiliated sites must provide to each site written documentation that details the reimbursement the site is receiving that month, and includes the:
 - Name of the site;
 - Total meals/snacks claimed, by type, by the site for the month;
 - Total meals/snacks disallowed by type, including the reasons for the disallowances, for the month, if applicable;
 - Total meals/snacks submitted for reimbursement (Minus disallowances, if applicable);
 - Total reimbursement for meals/snacks claimed and submitted for reimbursement for the month (minus cash-in-lieu);
 - Total cash- in- lieu for the month, if applicable;
 - Total reimbursement withheld for allowable administrative expenses for the month; and
 - Total reimbursement paid to the site for the claim month.

Section B - Unaffiliated Sites

Agreements - Permanent Agreement Between Sponsor and Unaffiliated Site

There are two types of Permanent Agreements Between Sponsors and Unaffiliated Sites:

- *Permanent Agreement Between Sponsor and Unaffiliated Site* - applies to the traditional sponsor/site relations in which the sponsor passes through funds to the site for operation of the nonprofit food service
- *Permanent Agreement Between Sponsor and Unaffiliated Site - Sponsor provides Meals and Snacks* - applies to sponsors that also serve as the meal service vendor and conducts the non-profit food service for the site and retain 100% of the meal reimbursement

Adding a Site

ODE CNP will not approve a site's participation, and sponsors may not claim reimbursement for meals served at a site, before the latest of the following dates:

- Effective date of the site's CCLD license;
- Date of the pre-approval visit;
- Beginning effective date on the *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site*;
- Latest date that the *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* is signed by the site or the Sponsoring Organization
- *Date of participation that ODE CNP assigns.*

Example: The beginning effective date on the *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* is February 21, 2023; the site's CCLD license is effective March 1, 2023, and the pre-approval visit was conducted March 10, 2023. The earliest the site could begin claiming would be March 10, 2023, the date of the pre-approval visit.

The following information must be submitted:

- Sponsor Annual Budget revision, both offline and in CNPweb, amending the sponsor's budget as the addition of site(s) will increase costs in the budget.
- CNPweb *Add Site Form* for each site to be added

Terminating a Site

To terminate (meaning to close) a site, sponsors must complete the process in CNPweb and submit any required documentation to ODE CNP.

The following information must be submitted:

- Sponsor Annual Budget revision, both offline and in CNPweb, amending the Sponsor's budget as the termination of sites will decrease costs in the budget.
- CNPweb *Inactivate Site Form* for each site to be terminated

Making Changes to a Site

To make a change to a site application (such as changing meal times), Sponsors revise the *Site Info Sheet* in CNPweb. Sponsors do not have to obtain the unaffiliated sites' signatures on the site application for changes the sponsor makes on behalf of the site; the sponsor must provide the site a copy of the site application with the changes indicated and maintain a copy on file. The sponsor can print the site application from CNPweb to accomplish this, or if completed via paper, mail the paper copy to the site.

Denials

A sites participation will be denied if:

- The site is already participating with another CACFP sponsor.
- The site, responsible principle(s) and/or responsible individuals(s) has been declared. Seriously Deficient and is on the National Disqualified List (NDL).
- The site signed the *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* with multiple sponsors.
 - The sponsor whose permanent agreement between sponsoring organization and unaffiliated site shows the earliest signature date of both the site and the sponsor representative has the legally binding application and agreement.
- The site is otherwise ineligible to participate.

Resuming Site Participation

A sponsored site whose *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* has been terminated by mutual consent that wants to resume its participation in the same Program Year, must participate with the same sponsor, unless:

- The site has "good cause" for a transfer and ODE CNP approves the site to transfer to another sponsor.
- The site signs a *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* for the next Program Year with another Sponsor.
- The site applies to participate directly as a sponsor with ODE CNP.

Sponsors must ensure a resuming site is eligible to participate and submit the same items as required for adding a new site when resuming participation.

Transfers

Sponsoring organizations may not recruit nor enter into a *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* for the next program year with sites that are currently participating or had participated with a sponsor in the current program year.

Sites that can document good cause for transferring from a sponsor may, with prior approval from ODE CNP, enter into a *Permanent Agreement Between Sponsoring Organization and Unaffiliated Site* with another sponsor at any time during the Program Year.

If a site wants to transfer to another sponsor, the site must:

- Request in writing, and receive, prior approval for the transfer from their current Sponsoring organization, stating the intention to terminate their agreement and the effective date of the termination.
- Demonstrate good cause for the transfer request.

“Good cause”: Transferring from the sponsorship of one Sponsor to another during the program year is limited to the following conditions:

- A sponsor denies a site access to the program.
- A sponsor reduces their level of benefit a site receives under the program, for example, the sponsor:
 - Will not allow sites to claim suppers or weekend meals because the sponsor does not want to monitor these meal services.
- Any other good cause as determined by the current sponsor.

It is the site's responsibility to demonstrate that such conditions exist.

Withholding Allowable Administrative Costs and Disbursement of Funds to Unaffiliated Sites

A sponsor of unaffiliated sites must only withhold an amount not to exceed 15% of each month's CACFP reimbursement to pay for actual allowable administrative costs incurred. In other words, sponsors of unaffiliated sites must limit the amount of reimbursement payments that can be applied to administrative costs for sponsoring organizations of sites to the lesser of 15% of the total reimbursement payments received or net allowable administrative costs incurred.

Sponsors of unaffiliated sites must disperse reimbursements to its sites within 5 days of receipt of payment from ODE CNP. This includes advances, if applicable.

All sponsors of unaffiliated sites must document and record all unaffiliated site CACFP disbursements each month.

Miscellaneous Requirements for Sponsors of Unaffiliated Sites

Unaffiliated sites, operating under a sponsoring organization, are not required by regulation or policy to conduct procurements that uphold free and open competition; i.e., they are free to purchase food and other items according to their own practices. Facilities can be Day Care Homes (DCHs), affiliated centers, or unaffiliated centers that have an agreement with a sponsoring organization.

As is the case for all sponsors submitting claims for reimbursement, sponsors of unaffiliated sites must perform edit checks on all sites it sponsors, including:

- Review of daily records, such as meal counts, attendance records, menus
- Documentation of enrollment of each child (Child Enrollment Forms), except for OSHCCs, Emergency Shelters and At-Risk Afterschool Care sites.

Section C - Serious Deficiencies

[7 CFR 226.16\(d\)\(4\)\(v\)](#); [7 CFR 226.16\(l\)\(2\)](#)

Serious Deficiency Process

Sponsors must develop and implement a serious deficiency policy and procedure for when serious deficiencies are found at sponsored sites. The sponsoring organization is ultimately responsible for any serious deficiency of a sponsored site (affiliated or unaffiliated). Whether the site is declared seriously deficient based on the non-compliance would depend on the frequency and severity of the error. Whatever action is taken, the sponsoring organization must be in compliance with the policies and procedures of the statute agency.

No individual on the **National Disqualified List (NDL)** may serve as a principal for a sponsored site. Sponsoring organizations are prohibited from submitting an application on behalf of a sponsored facility if the site's principals are on the NDL ([7 CFR 226.6\(c\)\(7\)\(iv\)\(B\)](#)). The State agency must declare an institution seriously deficient and initiate action to terminate the institution's agreement and disqualify the institution if the institution permits an individual who is on the National Disqualified List to serve in a principal capacity for the institution or one of its facilities.

If, in conducting a site review, a multi-site sponsor detects one or more serious deficiencies, the next review of that site must be unannounced. Serious deficiencies are the following situations, regardless of the type of facility:

1. Submission of false information on the application;
2. Submission of false claims for reimbursement;
3. Simultaneous participation under more than one sponsoring organization
4. Non-compliance with Program meal pattern;
5. Failure to keep required records;
6. Conduct or conditions that threaten the health or safety of a participant in care, or the public health or safety
7. A determination that the center has been convicted of any activity that occurred during the past seven years and that indicated a lack of business integrity. A lack of business integrity includes fraud, antitrust violations, embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, receiving stolen property, making false claims, obstruction of justice, or any other activity indicating a lack of business integrity as defined by the State agency, or the concealment of such a conviction;
8. Failure to participate in training, or
9. Any other circumstance related to non-performance under the sponsoring organization site agreement, as specified by the sponsoring organization or the State agency.

Serious Deficiency Process Procedure

Multi-site sponsors must develop and implement a procedure for when it determines that a site has committed one or more serious deficiencies listed in the section above. It must be based on [7 CFR 226.16\(l\)\(3\)](#).

Suspension of Participation of Sites

If State or local health or licensing officials have cited a center for serious health or safety violations, the sponsoring organization must immediately suspend the center's CACFP participation prior to any formal action to revoke the center's licensure or approval.

If the sponsoring organization determines that there is an imminent threat to the health or safety of participants at a center, or that the center has engaged in activities that threaten the public health or safety, and the licensing agency cannot make an immediate onsite visit, the sponsoring organization must immediately notify the appropriate State or local licensing and health authorities and take action that is consistent with the recommendations and requirements of those authorities.

An imminent threat to the health or safety of participants and engaging in activities that threaten the public health or safety constitute serious deficiencies; however, the sponsoring organization must use the procedures in [7 CFR 226.16\(l\)\(4\)](#) to provide the

site notice of the suspension of participation, serious deficiency, and proposed termination of the site's agreement.

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The At-Risk Afterschool Meals & Snacks component of the Child and Adult Care Food Program (CACFP) offers Federal funding to afterschool programs that serve a meal and/or a snack to children in low-income areas.

At-Risk Afterschool Meals & Snacks Program sponsors are required to comply with all CACFP requirements except those superseded by the program specific requirements found in this chapter. See also the USDA [At-Risk Afterschool Meals Guide](#).

Section A – Program Eligibility

Organization Eligibility

Child Care Centers

While the At-Risk component of CACFP is primarily geared towards non-traditional child care centers such as drop in afterschool programs, child care centers already participating in CACFP also may participate. In this situation, children would attend the center after their school day or on weekends, holidays, or school vacation. Children who do not attend school would continue to participate in the traditional CACFP meal service provided by the center, even during the “afterschool” hours.

Sponsors operating both child care center and At-Risk Afterschool Programs of the CACFP at the same site may only claim a total of two meals and one snack or one meal and two snacks per participant per day. These meals and snacks would include the meal and/or snack served as part of the At-Risk Afterschool Program.

For-Profit Centers

A for-profit center may receive reimbursement for At-Risk Afterschool meals and snacks if it meets the eligibility requirements discussed above, and is eligible to participate in CACFP through its child care center program. This means that at least 25 percent of the children served by the center through its traditional child care center program are eligible for free or reduced-price meals based on their family income.

The 25 percent threshold is based on the center’s enrollment or the licensed capacity, whichever is less. It is calculated during the calendar month preceding application for Program participation and each month thereafter.

Example: A for-profit child care center located in a low-income area has 32 pre-school children enrolled for care. The center would be able to claim reimbursement through CACFP for At-Risk Afterschool meals or snacks in any month in which the sponsor has documentation that at least 8 of the 32 pre-school children are eligible for free or reduced-priced meals.

Emergency Shelters

Emergency shelters that operate afterschool programs with education or enrichment activities for homeless children and youth during the school year may participate without regard to location.

Summer Food Service Program Sponsors

Many existing SFSP sponsors are also 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 having the ability to hire year-round staff, a continuous flow of reimbursements providing additional financial stability, and recognition in the community as a stable source of services. Communities benefit by having a partner that provides year-round nutrition services for children and brings increased Federal funds into the local economy.

Area Eligibility

At-Risk Afterschool Meals & Snacks Program sites must be located in a geographical area within the boundaries of a school (an elementary, middle, or high school) in which at least 50% of the enrolled students in the preceding October are eligible for free or reduced-priced meals under the National School Lunch Program (NSLP). Refer to the ODE CNP's current *Free and Reduced Price Eligibility List* which is available on the [ODE CNP CACFP Page](#) under the section for At-Risk Afterschool Sponsors. This list is updated annually.

Sponsors must obtain and submit proof that At-Risk Afterschool Meals & Snacks Program sites are area eligible. Acceptable documentation is:

- A letter or e-mail message from a school official stating that the site is located within the school attendance boundary of one of the schools on the above list
- A school boundary map showing the site is located within the school attendance boundary of one of the schools on the above list.

In school districts where busing or school choice policies are in place, if the site is located in the school from which the data is pulled, CACFP sponsors may rely on the October NSLP free and reduced price meal data for that individual school. Additionally, where busing or school choice policies are in place, but school attendance areas are still defined, school and non-school site eligibility may be determined based on the October enrollment or attendance data obtained for:

- Free and reduced-priced eligibility of the students who actually attend the area

school or;

- Free and reduced-priced eligibility of the students who would have attended the area school if it were not for the school busing or school choice policy. This option may be used only if the school food authority (SFA) is able to document the percentage of children eligible for free and reduced price meals at each school before and after students are reassigned.

If the school district does not have defined school attendance areas, the use of school data is not permitted for non-school sites. The SFA should contact their assigned Child Nutrition Specialist for assistance.

If an afterschool program is not area eligible, it may qualify to participate in CACFP as an Outside School Hours Care Center (OSHCC). OSHCCs, like At-Risk Afterschool care centers, provide organized nonresidential child care services to children during hours outside of school. See [Chapter 20 Outside School Hours Care Centers \(OSHCC\)](#) for more information on OSHCCs.

Private and Charter Schools

Private schools (and some charter and magnet schools) may use the October free and reduced-priced enrollment data for that private school or charter school, or free and reduced-price enrollment data for the public school attendance area in which the private school is located, to qualify as an eligible site.

Private schools (and some charter and magnet schools) located in school districts that do not have specific assigned schools but allow children to enroll in any of the area schools, At-Risk Afterschool Meals & Snacks Programs located in school buildings should use the free and reduced-price enrollment data from the school they are located in to determine area eligibility. Private schools (and some charter and magnet schools) located in non-school sites in areas with unassigned attendance areas should contact their assigned Child Nutrition Specialist for further information on determining site eligibility (see [CACFP Memo 04-2017](#)).

Eligibility Duration

A site's area eligibility determination for At-Risk Afterschool Meals & Snacks is valid for five years, even if the percentage of student's approved for free or reduced-priced meals at the school used to make the determination drops below 50% after the determination was made.

Disaster Response--Special Site Approvals

CACFP Site Eligibility--Based on the significant needs of each community, Food and

Nutrition Services (FNS) Regional Offices may waive the requirements under CACFP that sponsors document that each site is serving an area in which poor economic conditions exist.

These requirements may be waived for existing eligible sites located in the area damaged by a natural disaster that must relocate to areas that are not eligible based on school or census data.

Participant Eligibility

At-Risk Afterschool Programs may claim reimbursement only for meals and snacks served to children who participate in an approved afterschool meal program and who are age 18 or under at the start of the school year. Federal law has no minimum age for at-risk participants.

EXAMPLES:

- 1) Serving lunch to children after half-day kindergarten or a half-day Head Start Program is allowable through the At-Risk Afterschool meals component of CACFP because their school day has ended. However, the same children who are receiving lunch in the At-Risk Afterschool Program are not to be served lunch at school as well.
- 2) A Boys and Girls Club on the At-Risk Afterschool Program offers afterschool activities to children during the school year. Children younger than school age may be claimed for At-Risk Afterschool meals and snacks.

Although the At-Risk Program is available to children of all ages, there is no requirement that each facility must serve the full age range of eligible children. For example, a Program could operate at a high school and serve only high school-age students.

Eligible Programs

To be eligible to participate in the At-Risk Afterschool Meals & Snacks component of CACFP either independently or through a sponsor, an afterschool program must:

- Be organized primarily to provide for children afterschool or on the weekends, holidays, or school vacations during the regular school year
- Provide organized, adult supervised, regularly scheduled activities (i.e., in a structured and supervised environment)
- Include education or enrichment activities
- Be located in an eligible area

- Operate during the school year

Activities

Programs must provide educational or enrichment activities in an organized, structured, and supervised environment. There are no specific requirements for the types of educational and enrichment activities that a program can offer, examples include, but are not limited to, arts and crafts, homework assistance, life skills, remedial education, organized fitness activities, etc. Organizations should contact ODE CNP for assistance in determining if an activity is eligible.

Sponsors may contract with another organization, including a for-profit entity, to provide enrichment or educational activities for the afterschool program. However, the sponsor must retain administrative and fiscal responsibility for the meal service. Furthermore, the sponsor must be the party that enters into the agreement with ODE CNP and must assume responsibility for meeting all meal service requirements, including ensuring that meals are served at eligible sites (see [CACFP Memo 08-2012](#)).

Programs may be targeted to specific age groups or may accommodate the needs of a wide variety of ages. Programs that provide meals to various age groups also must provide educational or enrichment activities for the various ages of children served.

There is no requirement that the afterschool programs track the specific activities in which the children participate or document that the children participated in the offered activities. As long as appropriate educational or enrichment activities are provided, the site is eligible to serve meals to the children that attend the program.

Note: There is no requirement that all children receiving meals participate in the offered activities. However, age appropriate activities must be available for the participants to partake if they so choose.

Athletic Programs

Programs which are open to all, and do not limit membership for reasons other than space, security, or licensing requirements or those that include supervised athletic activities together with educational or enrichment activities, may be eligible.

Students who are part of school sports teams and clubs can receive afterschool snacks or meals as part of a broad, overarching educational or enrichment program offered by a school. Afterschool “drop-in” programs are acceptable. However, afterschool programs that include supervised athletic activity may only participate if they are “open to all” and do not limit membership for reasons other than space, security, or licensing requirements. For example, an afterschool police athletic league program that uses sports and recreational activities to provide constructive opportunities for community

youth could be approved to participate.

Stand-alone organized athletic programs engaged in interscholastic or community level competitive sports (for example, youth sports leagues, community soccer and football leagues, area swim team) are not eligible.

Special Needs Programs

At-Risk Afterschool Programs that are designed to meet the special needs of enrolled children or that have other limiting factors may be eligible to participate. These could include programs for children who have learning disabilities or for those who are academically gifted. Other targeted programs may be eligible as well.

Weekends, Holidays, and Vacations

Under the CACFP At-Risk Afterschool Program, meals and snacks may be reimbursed if they are served on weekends or holidays, including vacation periods (for example spring break), during the regular school year only. Meals and snacks served through CACFP on weekends or holidays during the school year may be served at any time of day approved by ODE CNP.

Expanded Learning Time Programs

“Expanded learning time” is a common term used in the education arena to describe schools or school districts that add significantly more school time for academic and enrichment opportunities to improve student achievement.

A school operating longer than the traditional school day may be eligible for afterschool snack reimbursement through NSLP or CACFP, or supper reimbursement through CACFP provided that it operates a school day that is at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the local educational agency in which the school is located (see [CACFP Memo 01-2011-revised](#)).

Licensing and Health and Safety Requirements

Sites must have a current Department of Early Learning and Care (DELIC) Child Care Licensing Division (CCLD) license or be CCLD recorded, unless exempt. Many afterschool programs operating in Oregon are exempt from CCLD licensing. Contact [CCLD](#) for further information on licensing requirements.

Sites that are exempt from state licensing or recording must either have:

- *Other Federal, State, or local approval* (e.g., school district-operated site or 21st Century Learning Center); or,

- Alternate Approval: All sites must meet State and/or local health and safety standards. (see [Chapter 2 Application & Renewal](#))

School District Operated Non-District Sites

School districts may sponsor and operate the At-Risk Afterschool Meals & Snacks Program in sites that are not owned by the school district (e.g., a Boys & Girls Club). These sites must maintain their own required licensing or alternate approval as outlined above. School district operation of the Program does not relieve the non-district site of the requirement to maintain the state licensing, recording, or alternate approval requirements necessary for their individual program.

Operating an At-Risk Afterschool Meals & Snacks Program in Combination with Other CACFP Programs

Sponsors that are already participating in the CACFP through traditional child care center programs, Head Start centers, or Outside School Hours Care Centers (OSHCC) may qualify for the At-Risk Afterschool Meals & Snacks Program reimbursement if they meet the same Eligible Program criteria as all At-Risk Afterschool Meals & Snacks Programs as defined in [Section A – Program Eligibility](#) of this chapter.

Additionally, At-Risk Afterschool Meals & Snacks Program must be located in separate facilities from the traditional child care center program (at a minimum, a separate classroom).

Claiming Meals

Sponsors operating both the traditional child care center and At-Risk Afterschool components of the CACFP must adhere to the meal limitation of claiming no more than two meals and one snack, or two snacks and one meal per child per day.

Reimbursement for meals other than At-Risk Afterschool Meals & Snacks are claimed and paid according to the Sponsor's OMER (see [Chapter 4 The One Month Enrollment Roster](#)), which must be supported by current, approved Confidential Income Statement (CIS) or alternate eligibility documentation. For example, meals and snacks served to preschoolers or to students receiving breakfast before school are claimed for traditional CACFP meal reimbursement.

Recordkeeping

Separate attendance, and meal count records must be maintained for the At-Risk Afterschool Meals & Snacks participants in the traditional child care program. Sponsors also *must not* include those participants who participate exclusively in the At-Risk Afterschool Meals & Snacks Program in their OMER. However, participants

participating in both traditional child care and the At-Risk Afterschool Program *would* be included on the CACFP Child Enrollment Roster and in the OMER.

Section B – Applying to Participate

Programs that are not a current CACFP sponsor and are interested in applying to participate in the At-Risk Afterschool Meals & Snacks Programs should see [Chapter 2 Application & Renewal](#) for information on applying to become a CACFP sponsor.

Current Child Nutrition Program sponsors may amend their agreement to add the At-Risk Afterschool Meals & Snacks Program. However, all program records and participant tracking must be kept separately and an *ODE–Child Nutrition Programs Child and Adult Care Food Program State Agency-Sponsor Agreement--AMENDMENT* completed.

The following steps must be followed to add an At-Risk Afterschool Meals & Snacks Program site to an existing *State Agency-Sponsor Agreement*. Current CACFP sponsors will follow the application instructions outlined below:

All current CACFP Sponsors should contact their assigned Child Nutrition Specialist as soon as they decide to add an At-Risk Afterschool Meals & Snacks Program site or sites.

Sponsors must:

1. Submit an *ODE–Child Nutrition Programs Child and Adult Care Food Program State Agency-Sponsor Agreement–AMENDMENT** to add At-Risk Afterschool Meals & Snacks Program to the existing *State Agency-Sponsor Agreement*
2. Submit an *Add Site/Modify Site Information Sheet* form* for each site to be added
3. Complete and submit the *CNPweb Sponsor and Site information Sheets* for ODE CNP approval
4. Submit documentation of the site's area eligibility
5. If the addition of an At-Risk Afterschool site changes an independent center sponsor to a multi-site center Sponsor, the sponsor must submit a new *Management Plan** and a revised *Center-Sponsor Annual Budget**. The sponsor will now be required to perform site monitoring (more than one CNPweb site number), see [Chapter 14 Multi-Site Sponsors](#) for more information on site monitoring.
 - a. If adding At-Risk Afterschool to an existing site– the sponsor is not required to submit a new Management Plan or a revised budget.

6. If requested by ODE CNP, submit a sample one-month menu* and menu documentation,
7. If the site that is being added is an unaffiliated site (see [Chapter 15 Sponsors of Unaffiliated Sites](#)), sponsors must contact their assigned specialist.
8. Train staff responsible for CACFP operations at the At-Risk Afterschool Meals & Snacks Program site
9. Conduct a pre-approval review for the site if the At-Risk Afterschool Meals & Snacks Program site will operate in a building or location not already approved as a site in CNPweb.
 - a. It is considered a best practice to conduct a pre-approval review for a program that is being added to a site that is already approved in CNPweb.
10. At its discretion, ODE CNP may conduct a Pre-Approval Review before approving the addition of a new At-Risk Afterschool Meals & Snacks Program site to an existing CACFP agreement.

*Indicates item is located within CNPweb, either packet or application tab

Once the above-listed requirements are met and ODE CNP has approved all information, ODE CNP will notify the sponsor of the approval of the At-Risk Afterschool Meals & Snacks Program participation and the start date (the date from which the sponsor may begin claiming meals).

Where it is not feasible to reuse leftovers, excess food may be donated to a nonprofit organization, such as a community food bank, homeless shelter, or other nonprofit charitable organizations.

Section C – Meal Patterns and Food Service

At-Risk Afterschool meals and snacks may only be claimed during the school year. On school days sponsors may serve supper and snack meal types. On non-school days (*weekends, holidays, down days, or school vacations*) sponsors may elect to serve and claim one meal and one snack per participant per day from any of the six meal/snack types: breakfast, am snack, lunch, pm snack, supper, or evening snack. At-Risk Afterschool Meals & Snacks Program sponsors may serve a snack and/or a meal after the school day ends and on non-school days even if served outside the traditional mealtime.

An At-Risk Afterschool center may not claim meals or snacks during the summer, unless it is located in the attendance area of a school operating on a year-round calendar.

All meals and snacks must be provided free of charge.

Snacks and meals must meet CACFP meal pattern requirements for components and portion size. Sponsors may serve and claim:

- One snack and one meal per participant per day; or,
- With ODE CNP prior written approval, sponsors may serve two snacks per participant per day if the sponsor cannot serve a meal.
 - Sponsors that would like to serve two snacks, instead of one meal and one snack must complete the information on meal types and times on the CNPweb *Site Information Sheet*. Write an explanation under *General Comments* stating the reason why the site cannot serve a meal and report by meal type on the CNPweb reimbursement claim.

Programs that serve both a snack and a meal (or two snacks) must have a minimum of 2-1/2 hours between the start time of one meal/snack and the start time of the second meal/snack. There is no minimum time between the end of the school day and the meal or snack service, but it must be served during the operation of the afterschool care program.

Centers may serve different meals and/or snacks on different days or to different groups of children. For example, a site could serve lunch and a snack to children who attend half-day kindergarten and then serve a snack and supper to older children who attend full day school. Sites may also serve a supper and then a snack.

Meals and/or snacks served on weekdays when school is in session must be served after the child's school day has ended. Meals and/or snacks served on weekends, school breaks, school vacations or holidays may be served at any time of day approved by ODE CNP. Meals served before school, during the school day, or during the summer may not be claimed for reimbursement through the At-Risk Afterschool Meals & Snacks Program.

In areas where schools operate on a year-round basis, At-Risk Afterschool Meals & Snacks Programs set up to serve children attending the year-round schools may receive reimbursement for meals and snacks through the CACFP all year including summer.

In areas where the school week has been shortened to 4 or less days if the school offers an enrichment activity program on the non-school days it may serve a meal and/or snack as part of the program.

In areas where the school operates a longer than traditional school day they may be eligible for afterschool snack or meal reimbursement through CACFP. The school day

must be at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the local educational agency in which the school is located. If the district's change to a four-day week schedule increases the school day at least one hour longer than the State's average school day or the school day of the surrounding schools, the district may be eligible for At-Risk Afterschool meals or snacks. For more information contact your Child Nutrition Specialist.

At-Risk Afterschool Meals & Snacks Program Sponsors that are also Local Education Agencies (LEA) operating the National School Lunch Program (NSLP) may be reimbursed for snacks and meals that meet the ODE CNP-approved NSLP menu planning option/meal pattern.

The CACFP meal pattern for 6-18 year olds is used to determine minimum portion sizes for all reimbursable meals and snacks although increased portion sizes are encouraged, if appropriate. See [Chapter 9 Meal Pattern Requirements](#) for the CACFP Meal Pattern Chart.

At the discretion of the At-Risk Afterschool School Food Authority (SFA) sponsor, and with state agency approval, participants may be permitted to decline a certain number of components offered without affecting the reimbursement for the meal. Please see Chapter 10 Meal Service and Menu Records' section on [Offer Versus Serve](#) for more information.

Taking Food Components Off-Site

At-Risk Afterschool sponsors may allow participants to take one vegetable, fruit, or grain item off-site to eat at a later time. The food item the participant takes off-site must be from the participant's own meal or snack or left on a share table by another participant who did not want it. Sponsors must ensure that allowing food items to be taken off-site is in compliance with local and State health and safety codes.

ODE CNP encourages At-Risk Afterschool sponsors to use this flexibility to increase children's consumption of vegetables and fruit, and help reduce potential food waste in the CACFP. It is important to note, though, that At-Risk Afterschool sponsors must have the capacity to monitor the site when food items are being taken off-site to prevent any food safety or integrity issues from arising.

Section D – Reimbursements

All meals served to all participants in this program are reimbursed at the Free reimbursement rate. It is not necessary for sponsors to make eligibility determinations based on household income. Therefore, At-Risk Afterschool Meals & Snacks Programs are not required to distribute or collect *CIS* forms or to develop a One Month Enrollment Roster (OMER).

Section E – Required Recordkeeping and Reporting

Sponsors that operate only At-Risk Afterschool Meals & Snacks Programs do not have to collect *CIS* forms or develop an OMER since all snacks and suppers are reimbursed at the Free rate.

The following records must be dated (month, day, year) and maintained:

- Daily attendance records or roster sheets with arrival and departure times OR “Present/Absent” notations
- Point-of-service meal or snack counts (See [Chapter 5 Attendance & Meal Counts](#)).
- Menus of snacks and meals which include the date and all food components served establishing that the meal patterns were met (See the [Sample Menu Form](#)).
- SFAs that choose to use the NSLP new meal pattern in the CACFP At-Risk Afterschool Meal & Snack Program will maintain the NSLP-required meal pattern documentation.
- Documentation of non-profit food service (See [Chapter 7 Financial Management of the CACFP](#) for more information.)
- Site monitoring documentation if the sponsor operates more than one site (See [Chapter 14 Multi-Site Sponsors](#) for more information on site monitoring)
- Documentation of staff training (See [Chapter 13 Trainings](#) for more information on training requirements).
- Civil Rights Policy and complaint procedure and Racial Ethnic Data Collection. (See [Chapter 12 Civil Rights](#) for more information on Civil Rights requirements).
- Medical Statements or Meal Preference Forms (See [Chapter 9 Meal Pattern Requirements, Section E Meal Accommodations](#) for more information on food substitutions.)
- Independent centers or sponsors must notify the ODE CNP of any substantive changes to the At-Risk Afterschool Meals & Snacks Program, including changes to existing sites, contact information, and key staff. Sponsors who want to add

new At-Risk Afterschool Meals & Snacks Program sites must provide the ODE CNP with information indicating that the new sites meet Program requirements, including area eligibility. These sites must be approved before claims may be submitted.

- Proof of site eligibility - CCLD licensing, CCLD recording, other Federal, state, or local approval, or alternate approval, as applicable.

Section F - USDA At-Risk Afterschool Handbook

In December 2016, USDA issued the [*At-Risk Afterschool Meals - A Child and Adult Care Food Program Handbook*](#). The handbook provides further guidance on applying for and operating an At-Risk Afterschool Meals & Snacks Program. ODE CNP encourages sponsors to use this resource.

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Chapter 17: Emergency Shelters

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Emergency shelter sponsors are required to comply with all CACFP requirements except those superseded by the program-specific requirements found in this chapter.

Section A – Program Eligibility

Eligible Sponsors

Emergency shelters are public or private nonprofit organizations or their site(s) that provide temporary shelter and food services to children who are unhoused. Persons with disabilities, regardless of their age, may also receive CACFP meals at the shelters where they reside.

Emergency shelters may be residential, non-residential, or a combination of both. For purposes of determining CACFP eligibility, USDA recognizes that temporary housing is not just limited to providing a safe place to sleep. Although it may not offer overnight services, a day shelter provides a safe place and an address for the people who are unhoused, for a temporary period of time.

Eligible sponsors and sites include:

- Family shelters
- Domestic violence shelters
- Shelters for runaway youth
- Shelters that offer temporary housing in a different location than the meal service
- Shelters where residents prepare their own food onsite, with supervision.

Residential Child Care Institutions (RCCI)s that serve a distinct group of children who are unhoused and are not enrolled in the RCCI's regular program are eligible to operate CACFP emergency shelters.

The shelter may participate as a site under an existing CACFP sponsor or complete an application and sign an agreement directly with the CACFP State agency.

Eligible Sites and Licensing

Eligible sites include emergency shelters, domestic violence shelters, and some transitional housing providers. Shelters must provide temporary housing and food services to children who are unhoused. Shelters must have documentation of current, satisfactory sanitation and fire/safety inspections. Unlike most other CACFP facilities, emergency shelters do not have to be licensed to provide day care services.

However, the shelter must meet all health and safety codes required by State or local law.

Meals served in temporary housing, such as a hotel, may qualify as a CACFP Emergency Shelter if the hotel is a facility all or a part of which is used to provide temporary housing, and provides congregate meals through an otherwise eligible public agency or private non-profit organization.

Exception for non-residential shelters: Although it may not offer overnight services, non-residential shelters must be a legitimate provider of services to unhoused children, and able to certify that the children who receive meals and snacks are residents of emergency shelters. The emergency shelter sponsor will need to ensure that all participants whose meals are claimed for reimbursement are residents of an emergency shelter.

Non-Eligible Sites

Generally, non-eligible institutions for CACFP emergency shelters include:

- Transitional apartments
- Independent living facilities
- Single room occupancy (SRO) residences
- Housing units where families double or triple up with friends or relatives
- For-profit shelters

Disasters

During a disaster, emergency shelters that provide temporary housing to displaced families are eligible to participate in CACFP. When ODE CNP designates a facility as an emergency shelter, all children through age 18 may receive up to three free meals (breakfast, lunch, and supper) each day. Where significant numbers of persons are being temporarily housed, ODE CNP may designate any appropriate facility as an emergency shelter and may waive some application requirements in these situations (see [CACFP Memo 07-2007](#)).

Any appropriate facility providing temporary housing or meal service to displaced families is eligible as an emergency shelter. Sites may include a school or an institution which, is providing meals to displaced families who are being temporarily housed elsewhere in locations that may not have the means to provide meal services to these temporary residents.

During disasters, the State agency may waive institution application requirements.

Eligible Participants

CACFP provides up to three reimbursed meals a day for children aged 18 years and younger living in emergency shelters. CACFP serves children, including teenagers 18

years and younger, who are emergency shelter residents or receiving emergency shelter benefits. Persons with disabilities, regardless of their age, may also receive CACFP meals at the shelters where they reside.

Eligible children who receive their meals at the shelter are automatically eligible for free meals. There are no application forms for parents/guardians or participants to complete.

All reimbursable meals must be served in group settings (congregate meal service), at no cost to the child, or disabled participant.

Children who are not residents of the shelter or receiving day services of the shelter are not eligible to receive meals and snacks claimed for reimbursement. Additionally, meals and snacks served to adults 19 years old and older may not be claimed for reimbursement, except for persons with disabilities, regardless of their age,

Meals and snacks served to children who reside with their parents or guardians in an emergency shelter, even if it is only for a single day or night, may be reimbursable through CACFP. Many times, members of families experiencing houselessness may be separated. Children may receive reimbursable meals and snacks at the shelter where a parent resides, as long as the shelter can document that the children are residents of emergency shelters.

The shelter must certify that each child or disabled participant receiving reimbursable meals is a resident of an emergency shelter. The easiest way to document a child's eligibility may be for the shelter director to maintain a list of eligible children that includes each child's name, date of birth, and period of residency.

Reimbursement Rates

All meals and snacks served to eligible children are reimbursed at the Free rate. Emergency shelter sponsors are not required to make eligibility determinations based on income. Therefore, shelter programs are not required to distribute and collect Confidential Income Statements, Child Enrollment Forms (CEFs), or to develop a One Month Enrollment Roster (OMER).

Reimbursable Meals

Emergency shelters receive payments for serving up to three meals each day to each eligible child, or disabled participant

Emergency shelters may prepare meals onsite in traditional settings, i.e., sponsor staff prepares meals for eligible participants. Additionally, if the shelter provides the food

and supervises the residents as they prepare and serve their own meals, it may be eligible for CACFP. Some shelters encourage residents to prepare their own meals, to help them feel at home and assist them in transitioning to permanent housing. To be eligible for CACFP, the shelter must provide supervision to ensure that meals and snacks are served and consumed in a congregate meal setting, that the meals meet the CACFP meal pattern requirements, and that records to justify its claims for reimbursement are maintained.

Meals and snacks must meet CACFP meal pattern requirements and must be provided to eligible participants free of charge. Shelters may be approved to be reimbursed for up to three reimbursable meals (breakfast, lunch, and supper) or two meals and one snack, per participant per day.

Meals must be served in congregate meal settings. Meals served in private family quarters are not eligible, except for infant meals. See next section, [Feeding Infants](#)

Refer to the [Chapter 9 Meal Pattern Requirements](#) for more information on CACFP meal pattern requirements.

Shelters may use donated foods to prepare reimbursable meals. However, the shelter must be able to show that all CACFP reimbursement is used for food service allowable costs, such as food, food service supplies and food service labor, and that no profit is made from CACFP funds. See [Chapter 7 Financial Management of CACFP](#) for more information on documentation that is required to demonstrate nonprofit food service.

Meals donated by restaurants: donated prepared meals served to eligible children may be claimed for reimbursement, as long as they meet CACFP meal pattern requirements, including supporting documentation requirements. Many shelters are charitable institutions that may depend entirely on donations of food—from USDA, food banks, corporations, restaurants, caterers, private charities, and individual donors. Reimbursable meals and snacks made from donated foods must contain creditable amounts of each required food component. The shelter may have to add other food items to the meal service to ensure that it contains the minimum amounts of meat or meat alternate, vegetables, fruit, grains or breads, and fluid milk to be eligible for reimbursement.

Feeding Infants

Emergency shelters serving infants (ages birth through 11 months old) must offer meals to infants in care. Additionally, shelters must offer an infant formula option to the parent and/or guardian of the infant, that meets Program requirements. The shelter must meet this obligation to provide meals services to infants in care if older children are receiving CACFP benefits. Parents may decline the infant formula offered

by the facility and provide their own. The shelter may claim the infant meal for CACFP reimbursement if the parent provided formula meets the requirements for CACFP FDA-regulated, iron-fortified formulas. Sponsors must document a parent's decision to decline the offered formula. In order to minimize the recordkeeping burden, this can be done as simply as a notation on the meal count record or attendance record.

Exception for Infant Meals Served in Private Family Quarters

Meals provided for infants from birth through age 11 months but served outside the congregate setting may be claimed if the shelter:

- Provides all the required components to the infant's parent or guardian; and
- Maintains records documenting those meals met the meal pattern requirements.

Section B – Record Keeping Requirements

USDA recognizes the difficult circumstances unhoused families face and has modified the record keeping requirements for emergency shelters. However, shelters must be able to accurately document the number of meals served to eligible children.

The sponsor must maintain the following records:

- List of children and eligible disabled adults who reside at the shelter. The list must include the participant's name, date of birth and dates of residency or day services received. The shelter must certify that each child and eligible adult participant served reimbursable meals is a resident of the emergency shelter.

Reminder: Exception for non-residential shelters: Although it may not offer overnight services, non-residential shelters must be a legitimate provider of services to unhoused children, and able to certify that the children who receive meals and snacks are residents of emergency shelters.

- Daily attendance records, using either in/out times or present absent
- Daily point of service meal counts, identified by child and disabled adult's name and age, for each meal type claimed for reimbursement.
- Daily menus of meals and snacks served to children which include the date and all required food components served. Separate, dated menus for each infant served are also required.
- Menu required supporting documentation, such as recipes, CN Labels, and product labels. Refer to [Chapter 10 Meal Service and Menu Records](#).

- Medical Statements and Meal Preference Request forms, as needed. Refer to Chapter 9 Meal Pattern Requirements, [Section E Meal Accommodations](#).
- Documentation of non-profit food service including itemized food receipts. USDA recognizes that shelters are often run by volunteers and operate on a “shoestring” budget, therefore USDA does not wish to create undue record keeping burdens. All that USDA requires for Emergency Shelters is a simple record of food service revenues and expenditures that demonstrates that the CACFP reimbursement is used to support and improve the meal service for young people in temporary housing.
- Site monitoring documentation (if the Sponsor operates more than one CACFP approved site). Refer to [Chapter 14 Multi-Site Sponsors](#).
- Documentation of staff training. Refer to [Chapter 13 Trainings](#).
- Civil Rights related records. Refer to [Chapter 12 Civil Rights](#).

Section C - Questions and Answers Regarding Emergency Shelters

Are refugee children and qualifying adults with disabilities residing in the emergency shelter eligible for CACFP meals?

Yes, citizenship is not an eligibility consideration for children and persons with disabilities of any age who would participate in CACFP.

Can meals served to persons with disabilities above age 18 be claimed for reimbursement?

Yes, meals served to persons with disabilities above age 18 can be claimed, but the majority of meals served and claimed must be provided to children.

Can emergency shelters claim CACFP reimbursement for meals that are supported with funds from other Federal programs?

Yes, the shelter can use other available funds, however the shelter cannot claim the same meal under two different programs. For example, the shelter could use its FEMA funds to serve meals to adults or to nonresidential children whose meals would not be eligible for CACFP reimbursement.

Can a shelter that provides congregate meals to homeless families participate even if the clients receive vouchers from the shelter to stay at motels?

Yes, a shelter may be eligible for CACFP even if it offers housing in a different location from where it provides meal services. Again, there must be assurances that the shelter is a legitimate provider of services to homeless children, and that it is able to document that the children who receive meals and snacks are residents of emergency shelters.

When a battered women's shelter applies to participate in CACFP, must it comply with CACFP media release requirements?

No, due to the secrecy needed to ensure the safety of residents, a media release is not required for a battered women's shelter. Providing safe, emergency shelter to battered women and their children is the first step in meeting the needs of women fleeing domestic violence. If the location of the shelter is kept secret to ensure the safety of its residents, it is not necessary to apply this requirement.

Some shelters may be authorized to accept food stamps (Supplemental Nutrition Assistance Program – SNAP benefits) from some of their meal clients. Can a shelter that accepts food stamps as payment for meals accept food stamps and claim reimbursement for the meals served to eligible children through CACFP?

Yes, if an emergency shelter provides services in exchange for a specific portion of a family's food stamps, and there is no separate charge for individual meals, the shelter can participate in CACFP and claim reimbursement for serving meals and snacks to eligible children. However, the shelter cannot collect food stamps as payment for specific meals, and still claim those meals under CACFP. That would be equivalent to making a family pay cash for its child's meals when the meals must always be served free.

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Sponsors of CACFP Head Start must comply with all CACFP requirements except those superseded by Head Start program-specific requirements found in this chapter.

Section A – Overview

This chapter is applicable to Head Start centers, Early Head Start centers, and Oregon Head Start Pre-Kindergarten (OHS Pre-K) Programs which participate in the Child and Adult Care Food Program (CACFP) either as independent centers or under the auspices of a sponsoring organization (multi-site sponsor). Center-based, home-based, and combination Head Start models are eligible to receive meal reimbursement for meals served in congregate meal settings in an ODE CNP-approved child care facility. Because of the unique nature of Head Start and Early Head Start, the USDA and ODE CNP have modified some of the record keeping requirements.

This chapter does not apply to the Child Care Center sponsors:

- Who contract with one or more Federal Head Start grantee institutions to sponsor Head Start or OHS Pre-K “slots.”
- Who participate in [Oregon Pre-School Promise](#). **Note:** Some Head Start and OHS Pre-K sponsors do participate in Oregon Pre-School Promise and this chapter does apply to them.

Site Approval

Federal or State approved Head Start sites qualify for CACFP as “Other Federal, State, and Local Approval.” In CNPweb, on the *Site Information Sheet*, sponsors will select “Other Federal State or Local Approval” and enter their approval type as “Fed Head Start/Ore Pre-K.”

Section B – Participant Eligibility

All children enrolled in Head Start, Early Head Start, and OHS Pre-K Programs are automatically eligible for free meals in Child Nutrition Programs even if the child did not qualify for Head Start based on income. All reimbursable meals served to children enrolled in Head Start/Early Start/OHS Pre-K programs may be claimed at the free rate.

On the October (or first operating month of the CACFP fiscal year) reimbursement claim for each site, Head Start sponsors will enter the total number of enrolled Head

Start children in the Free category and will report “0” children in the Reduced-priced and Above-Scale categories. *Exception:* If the site has non-Head Start/Early Start/OHS Pre-K enrolled children in care, then the Sponsor must develop a One Month Enrollment Report (OMER) for the site and submit those numbers on the first claim month of the fiscal year. See the next section in this chapter, [Non-Head Start Enrolled Children](#) for more information

Head Start sponsors must establish eligibility of all Head Start enrollees, by site, through documentation created by their organization. Forms of acceptable documentation include:

- An approved Head Start application,
- A statement of Head Start enrollment from a Head Start Eligibility Official
- An annual list of participants from a Head Start Official

Non-Head Start Enrolled Children (Community Slot participants)

Some Head Start sponsors have enrolled participants whose slot is paid for by a funding source other than Head Start or Oregon Pre-K. In these cases, participants are not automatically eligible for free CACFP meals. These slots are called “community slots.” Community slot participants include children enrolled for care at the site, but not in Head Start/ OHS Pre-K. This includes children enrolled in Oregon Pre-school Promise.

Head Start and OHS Pre-K Sponsors must develop a One Month Enrollment Roster (OMER) for each site where *non*-Head Start enrolled children are in care. The OMER must list *all* children (both Head Start and non-Head Start) enrolled in care. Confidential Income Statements and the One Month Enrollment Roster template are both available to download on the [CACFP Resources](#) public webpage. See [Chapter 3 Participant Enrollment and Eligibility](#) for more information on determining participant eligibility and [Chapter 4 The One Month Enrollment Rosters](#), for more information on developing an OMER.

If a site has non-Head Start/OHS Pre-K children enrolled, then an OMER is required to be developed for the site. Sponsors must enter the following information in the CNPweb *Site Information Sheet* in the General Comments field at the end of the form: “OMER required; non-Head Start children in care.”

Early Head Start (EHS)

Early Head Start is a federally funded child development program that provides services to low-income infants, toddlers, and pregnant women. It has the same

eligibility criteria as Head Start. USDA guidance allows Early Head Start enrolled participants automatic eligibility for free meals.

In addition to children who are enrolled in Head Start, the law establishes free meal eligibility for infants and toddlers, and, in some instances, pregnant women, who receive Early Head Start services. To establish automatic eligibility, prospective mothers must be enrolled in Early Head Start and be eligible to receive school meals through the National School Lunch and School Breakfast Programs, or another child nutrition program.

CACFP Child Enrollment Forms

CACFP Child Enrollment forms must be on file for all participants in care and whose meals will be claimed for reimbursement. Please see [Chapter 3 Participant Enrollment and Eligibility](#) for further instructions on CACFP Child Enrollment Forms.

Infants

Head Start sponsors are not required to document a parent's decision to accept or decline an offered infant formula. Head Start has more comprehensive infant formula requirements than CACFP. However, in order for the infant meal to be reimbursable, it must meet the CACFP meal pattern requirements and the Daily Infant Menu record must be completed for each meal claimed for reimbursement.

Certifying Head Start Eligibility for Other Sponsors

If a Head Start/OHS Pre-K participant is in care at a child care center participating in CACFP, the child care center may claim the child in the Free category without a completed CIS if they have an official document from a Head Start/OHS Pre-K program stating the child is enrolled for the current school year.

ODE CNP requests Head Start sponsors provide parents/guardians of participants an official document stating that the participant is enrolled in the Head Start program. The document (e.g., a letter) should state the enrollment year, be dated, and signed by a Head Start eligibility official.

A sample letter could state:

(Name of HS enrolled participant) is enrolled in the (name of sponsor) Head Start/OHS Pre-K program for the 20XX-20XX school year. If they are also enrolled in a child care center that participates in the Child and Adult Care Food Program, present this

document as a certification that your child is enrolled in Head Start/OHS Pre-K so you will not be required to complete a Confidential Income Statement.

ODE CNP is also aware that some Head Start/OHS Pre-K programs transport children to centers or day care homes. If this is the case, the Head Start/OHS Pre-K program may provide the center with an official document on the sponsor's letterhead, which lists the names of the Head Start/OHS Pre-K-enrolled children, the school year (e.g., 20XX - 20XX). The document must be signed and dated by a Head Start eligibility official.

Section C - Developing the OMER - If Claiming Meals for Siblings and/or Community Slot Children

On the October (or first claim month of the fiscal year) reimbursement claim, Head Start/OHS Pre-K Sponsors must fill in the OMER numbers. For further information on completing the OMER see [Chapter 4 The One Month Enrollment Roster](#). The OMER must include all participants, and only those participants who are enrolled in the OMER month, by site. Enrolled means there is a CACFP Child Enrollment Form on file. Sponsors of Head Start/OHS Pre-K programs must develop a system for ensuring that the OMER is accurate. The system must address ways to:

Determining Income Eligibility

- Identify siblings of enrolled participants whose meals will be claimed for reimbursement.
- Identify community slot participants (non-Head Start or OHS Pre-K-funded participants) whose meals will be claimed for reimbursement.
- Distribute, collect, and approve Confidential Income Statements (CIS) for those participants.

Developing the CACFP One Month Enrollment Roster

- Annually collect a CACFP Child Enrollment Form for all Head Start/OHS Pre-K enrollees, siblings, and children in community slots.
- Develop an October (or first claim month of the fiscal year) CACFP One Month Enrollment Roster that includes all children enrolled in October at the site(s).
- Indicate on the CACFP One Month Enrollment Roster each sibling and/or community slot child's income eligibility category based on the eligibility

determination from the CIS, or other acceptable eligibility documentation. All Head Start/OHS Pre-K enrollees will be entered as free,

- Report the OMER numbers for Free, Reduced Price and Above Scale listed in the OMER block at the top of the OMER roster form on the CNPweb's first claim month of the fiscal year's reimbursement site claim. The OMER numbers are entered for the site(s) in the section Center Operating and Enrollment Data," – in CNPweb, these are fields 1-4 on the site claim.

When ODE CNP conducts an administrative review, the sponsor will be asked if there are siblings and/or community slots being claimed at any site. If yes, ODE CNP staff will review the approved eligibility documentation for siblings and community slot children, the October (or first claim month of the fiscal year) OMER for the affected site(s), and all CACFP Child Enrollment Form(s) to verify the OMER.

Any sponsor may submit a request for a revised OMER for other months of the fiscal year if they believe it would result in a higher reimbursement rate. Sponsors must submit requests in writing to their ODE CNP assigned Child Nutrition Specialist and will be required to submit the OMER roster and supporting documentation so ODE CNP may verify the revised OMER. All confidential information, such as the OMER roster and supporting documentation must only be sent to ODE CNP using a secure transfer method (not email or fax). The assigned ODE CNP Specialist will assist you in how to submit documentation securely.

Section D - Recording Attendance

All Head Start/OHS Pre-K classrooms must record daily attendance. Depending on the situation, either recording In/Out times or present/absent may serve to document daily attendance.

Present/Absent

For part-day classrooms which have a distinct start and end time, arrival and departure times are not routinely required. A record of each participant's presence or absence is sufficient. Deviations from the normal program day, such as late arrivals and early departures must be recorded with In/Out times.

Full Day

Full day, “wrap-around” classrooms must document actual In/Out times as required by the Oregon Child Care Licensing Division (CCLD). Sponsors must develop a system for recording In/Out times when parents fail to do so.

School Bus Transport

For those participants who are transported by school bus, a “B” may be used to indicate their arrival or departure on the bus. The scheduled arrival and departure time of the bus must be documented and readily available upon request.

Section E– Claiming Meals Served to Non-Head Start or OHS Pre-K-Funded Participants (“Community Slots”)

Some Head Start sponsors have participants whose slot is paid for by a funding source other than Head Start or Oregon Pre-K. If this is the case, the participant is not automatically eligible for free meals. To claim these meals at an approved CACFP site, a Head Start sponsor must follow the instructions in [Section C – Developing the OMER](#) in this chapter.

Section F – Meals Served to Child Visitors

Siblings of Head Start/OHS Pre-K–enrolled children or other child visitors (such as potential participants) are not automatically eligible for Free meals.

As defined by the Oregon Child Care Licensing Division (CCLD), all children visiting the center on a regular basis count in licensed capacity. Children attending with a non-staff parent do not count as enrolled as long as the parent remains with and is responsible for non-enrolled children ([CCLD Rules for Certified Child Care Centers 414-300-0040 Enrollment](#)).

CACFP regulations do not require Head Start/OHS Pre-K programs to claim reimbursement for meals served to siblings or other child visitors. It is each Head Start/OHS Pre-K sponsor’s choice to decide if it will claim meals served to sibling visitors or other child visitors. Sibling visitors in attendance during the meal service must be included in the Daily Attendance Record, including full name and actual in/out times.

- If sibling visitor meals are not claimed for reimbursement, Head Start/OHS Pre-K programs are not required to develop an OMER. Any meals served to child-aged visitors must be marked on the Daily Meal Count Form, but not claimed for reimbursement. Furthermore, visitor meals are not an allowable CACFP expense. Therefore, the cost of meals to visitors of any age, who are not enrolled in CACFP, must be paid with non-CACFP funds, and documented accordingly.
- If a sponsor chooses to claim meals for siblings of Head Start/OHS Pre-K enrolled children, the sponsor must enroll the child for care and include the sibling on the One Month Attendance Report (OMER).

Meals claimed for reimbursement for infant siblings or visitors must be consistent with all infant feeding regulations. See [Chapter 11 Infant Meal Pattern](#) for more information.

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Chapter 19: For-Profit Programs

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Sponsors of CACFP for-profit programs must comply with all CACFP requirements except those superseded by the for-profit program-specific requirements found in this chapter.

Section A – Qualifying as a For-Profit Program

For-profit (also referred to as “Proprietary”) CACFP sponsors may be any qualifying private, for-profit organization that provides nonresidential day care services and meets one of the following criteria in the month preceding initial application or reapplication and each month thereafter for each site claimed ([7 CFR 226.2 “For-profit center”](#)):

- **Adult Day Care Centers only:** 25% of participants in care are eligible for Title XIX of the Social Security Act (Medicaid)
- **OR**
- **Child Care Centers and Outside School Hours Child Care only:** 25% of participants in care (enrolled or licensed capacity, whichever is less) are eligible for free or reduced-price meals

Both methods for qualifying to claim meal reimbursements are determined monthly on a site-by-site basis. It is possible that not all sites will qualify to claim meal reimbursement every month.

Sponsors may use the [For-Profit Monthly Site Eligibility Calculation](#) worksheet to assist in determining each site’s percentage of Title XIX or Free and Reduced-Price-Eligible participants.

Requirement to Determine Site For-Profit Eligibility Monthly

Sponsors must determine if all for-profit sites meet or exceed the 25% eligibility requirement before submitting the site claim in CNPweb for each sponsored site. The sponsor must maintain documentation demonstrating verified for-profit eligibility for each site for which meals are claimed.

A sponsor may not round up when determining the 25% eligibility. A site with only 24.9% of its current enrollment and only 23% of licensed capacity eligible for Free and/or Reduced-Price is *not* eligible for meal reimbursement that month. CNPweb will calculate the site eligibility as noted in [Section B - Submission of a Claim for Reimbursement](#) later in this chapter.

25% Title XIX Eligibility–Adult Day Care Centers Only

For-profit sponsors may qualify if 25% of the site's current enrolled participants or licensed capacity, whichever is less, receive Title XIX funds. Current enrollment is defined as participants that are currently enrolled during the claim month. Licensed capacity is defined as the capacity listed on the site's certification.

For-profit sponsors must maintain on file the Title XIX funds eligibility documentation for each participant counted in the 25% for every month a reimbursement claim is submitted.

Sponsors must use the following process to determine 25% eligibility **for each site every month prior to submitting a claim** for meal reimbursement to ODE CNP:

1. Use Title XIX funds eligibility documentation that is current for the claim month.
2. Using the CACFP One Month Enrollment Roster Excel Spreadsheet, create a Monthly For-Profit Roster for each claim month listing all enrolled participants. The CACFP One Month Enrollment Roster Excel Spreadsheet can be found on the [CNPweb](#) packet page under the Off-Line Forms heading.
3. On the Monthly for-Profit Roster, document the date of the Title XIX eligibility documentation for each participant receiving benefits. This date goes in the column headed "For-Profit Adult Sites Only: Subsidized care (Title XIX) PMT Date"
 - a. The total number of participants with a Title XIX eligibility documentation date listed will be tallied in the "Total Title XIX Beneficiaries" box at the top of the spreadsheet.
4. To verify the accuracy of the enrollment at each site, compare the claim month's billing documentation to the month's enrollment on the For-Profit OMER. Only those who were billed for the claim month may be included in the for-profit eligibility calculation.
 - a. If a participant is on the billing documentation, but not listed on the For-Profit OMER, add the participant to the For-Profit OMER. If the participant does not have Title XIX, a current and approved CIS, or other eligibility documentation on file, count them as above scale.
5. To get the percentage Title XIX-eligible participants at the site, take the total from the box shown above on the roster and divide that number by the total number of participants listed on the enrollment roster, or the licensed capacity of the site, whichever is less. Use the [For-Profit Monthly Site Eligibility](#)

[Calculation](#) worksheet available on the [ODE CNP CACFP](#) webpage under the “For-Profit Sponsors” heading.

6. If the site has greater than or equal to 25% Title XIX-eligible participants during the month, the site qualifies for CACFP meal reimbursement in that month.

25% Free & Reduced-Priced Eligibility - Child Care Centers and Outside School Hours Child Cares (OSHCC) only

For-profit sponsors **who operate child care centers and outside school hours child cares (OSHCC)** may qualify for CACFP reimbursement in a given month if 25% of the site’s current enrollment or licensed capacity, whichever is less, are eligible for Free or Reduced-Price meals in that month. Sponsors must use the following process to determine 25% eligibility **for each site every month prior to submitting a claim for meal reimbursement** to ODE CNP:

1. Use current Confidential Income Statements (CIS), or other eligibility documentation to determine each participant’s eligibility category. See [Chapter 3 Eligibility Determination](#) for more information on determining a participant’s eligibility category.
2. Create a For-Profit [CACFP One Month Enrollment Roster](#) for each site for each claim month listing all enrolled participants.
3. Document on the For-Profit [CACFP One Month Enrollment Roster](#) the eligibility category (Free, Reduced-Price or Above-Scale) of each participant based on the current and approved CIS or other eligibility documentation on file. Count participants who do not have a current and approved CIS or other eligibility documentation on file as Above-Scale. See [Chapter 3: Participant Enrollment and Eligibility](#) for more information on eligibility determinations.
 - a. The total number of participants in each of the three eligibility categories will be tallied in the For-Profit One Month Enrollment Roster (OMER) block in the roster header.
4. To verify the accuracy of the enrollment at each site, compare the claim month’s billing documentation to the month’s enrollment on the For-Profit OMER. Only those who were billed for the claim month may be included in the For-Profit eligibility calculation.
 - a. If a participant is on the billing documentation, but not listed on the For-Profit OMER, add the participant to the For-Profit OMER. If the participant

does not have a current and approved CIS or other eligibility documentation on file, count them as above scale.

5. Use the number of participants who are Free and Reduced-Price eligible and divide that number by the total number of participants listed on the enrollment roster, or the licensed capacity of the site, whichever is less. Use the [For-Profit Monthly Site Eligibility Calculation](#) worksheet, found on ODE CNP's [CACFP Resources](#) webpage to assist in determining the correct percentage.
6. If the site has greater than or equal to 25% Free and Reduced-Price eligible participants during the claim month, the site qualifies for CACFP meal reimbursement in that claim month.

Section B – Submission of a Claim for Reimbursement

When completing the site claim(s) in CNPweb, the for-profit sponsor will enter the numbers determined from [Section A – Qualifying as a For-Profit Program](#) of this chapter in the following spaces on the claim:

For-Profit Sites Only:

- Total Title XIX Beneficiaries (**Adult Day Care Centers only**): Enter in the total number of Title XIX eligible participants. Note: This section will only appear for Adult Day Care Center sites.
- F/RP Eligible Participants (**Child Care Centers and OSHCC only**): Enter in the total number of Free/Reduced-Price eligible participants.
- Current Total Enrollment or Site Capacity: Enter in the total enrollment or site capacity, whichever is less.

Once the numbers have been entered, the for-profit sponsor will certify that documentation is on file for the claim month to support the For-Profit eligibility method utilized for the site:

- This organization certifies that during this claim month at the site being claimed, 25% of the Current Enrollment or Site Capacity (whichever is less) are Title XIX Beneficiaries or Free/Reduced-Price Eligible Participants.

If the site did not meet the For-Profit eligibility requirements for the claim month the sponsor will certify the following statement:

- This organization realized that the Site does not meet the 25% Eligibility for For-Profit Sites, and that this claim will not be reimbursed and no meals will be reported.

Section C – Record Keeping Requirements

For-profit sponsors must comply with all state and Federal regulations and policies governing CACFP sponsors as described in this manual. In addition, all for-profit sponsors must maintain records documenting that they meet the 25% eligibility requirements for each site every month CACFP reimbursement is claimed for sponsored sites. For-profit sponsors receiving Federal funds may be required by ODE CNP to have periodic audits.

Following is a list of records for-profit sponsors must maintain in addition to the records required of all CACFP sponsors, as described throughout this manual:

Title XIX 25% Eligibility Documentation (Adult Day Care Sponsors Only)

- Title XIX eligibility documentation for each eligible participant
- CACFP For-Profit One Month Enrollment Roster for the claim month
- Site licensed capacity
- Calculations and documents demonstrating how the 25% Title XIX eligibility was met for each site claimed for the claim month

Free/Reduced-Price 25% Eligibility Documentation (Child Care Centers and OSHCC only)

- Current Confidential Income Statement (CIS) forms or alternate eligibility documentation for all participants counted as Free-and Reduced-Price-Eligible during the claim month
- CACFP For-Profit One Month Enrollment Roster for the claim month
- CCLD licensed capacity (for childcare sites)
- Calculations and documents demonstrating how the 25% Free and Reduced-Price eligibility was met for each site claimed for each claim month

Section D – Change in Ownership

Sponsors *must* notify ODE CNP of ownership changes prior to the change taking place in order to avoid a potential lapse in claiming and/or unallowable reimbursement. In most situations, the agreement will be terminated and the “new sponsor” will need to apply for CACFP participation.

Contact your assigned Child Nutrition Specialist as soon as possible once it has been determined that a for-profit care center will be sold.

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Chapter 20: Outside School Hours Care Centers (OSHCC)

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Sponsors of CACFP Outside School Hours Care Centers (OSHCC) must comply with all CACFP requirements except those superseded by the OSHCC program-specific requirements found in this chapter.

Section A – Program Eligibility

Eligible Sponsors

Eligible Outside School Hours Care Centers (OSHCC) sponsors are public or private nonprofit care centers (except for day care homes) or for-profit centers that are licensed or approved to provide organized nonresidential child care services to school aged children ages 12 years and younger during hours outside of school operation, including weekends, vacations, and summer break.

Eligible Sites

Eligible sites must be organized for the purpose of providing child care services to school-aged children outside of school hours. In addition, OSHCCs are eligible to serve lunches to enrolled children during periods of school vacation, including weekends and holidays. and to children attending schools which do not offer a lunch program, but they must be enrolled in the OSHCC.

School Food Authorities (SFAs)

Nonresidential public or private nonprofit schools which provide organized child care programs for school children may participate in the Program as OSHCCs if:

- Children participate in a regularly scheduled child care program. The Program must be organized for the purpose of providing services to children and is distinct from any extracurricular programs organized primarily for scholastic, cultural, or athletic purposes.

Therefore, schools are prohibited from participating as OSHCCs in CACFP solely to support organized extracurricular school activities that are restricted to children with special skills or interests, e.g., school athletic teams and 21st Century Community Learning Centers (CCLC)s. CACFP regulations do not prohibit CACFP participation by a school which provides scholastic, cultural, or athletic activities when all children attending the school can participate in the activities.

Weekend-only centers operated by schools are not eligible as OSHCC.

Licensing and Health and Safety Requirements

Sites must have a current Oregon Child Care Licensing Division (CCLD) license or be CCLD recorded, unless exempt from licensing requirements. Many afterschool programs operating in Oregon are exempt from CCLD licensing, however they are required to be recorded. Contact CCLD for further information on licensing and recording requirements.

Sites that are exempt from state licensing or recording must either have:

- Other Federal, State, or local approval (e.g., school district-operated site); or,
- Alternate Approval: All sites must meet State and/or local health and safety standards. (see [Chapter 2 Application and Renewal](#))

Eligible Participants

Eligible participants in OSHCC include children 12 years old and younger attending school and enrolled for care. Sponsors of OSHCCs will use the sponsor's own enrollment documents to determine if participants are enrolled for care. OSHCCs are not required to distribute, collect, and maintain Child Enrollment Forms (CEFs) on file.

One Month Enrollment Roster

OSHCCs must develop a One Month Enrollment Roster (OMER) annually for each approved OSHCC site. See [Chapter 4 The One Month Enrollment Roster](#) for more information on the OMER.

Reimbursable Meals

OSHCCs may be approved to claim one or more of the following meal types: breakfast, snack, or supper. A maximum of two meals and one snack or two snacks and one meal may be claimed daily for each eligible child. In addition, such centers may be approved to serve lunch to enrolled school-age children during periods of school vacation, including weekends and holidays, and to enrolled children attending schools which do not offer the National School Lunch Program (NSLP). Such centers, however, cannot be approved to operate the CACFP on weekends only.

Meals and snacks must meet CACFP meal pattern requirements and must be provided to eligible participants free of charge.

Section B – Record Keeping Requirements

Sponsors of OSHCCs in CACFP must maintain all general record keeping requirements stipulated in this manual including the following (see [Chapter 1 Introduction](#) for more information):

- Enrollment document for each participant that shows the participant is enrolled in the center.

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Section A – Overview

The goal of the CACFP with respect to adults is to enhance the health and well-being of all adult day care program participants by ensuring access to a wide variety of foods as part of a well-balanced nutritious diet.

Sponsors of adult day care programs must comply with all CACFP requirements except those which are superseded by the adult day care program-specific requirements found in this chapter. Sponsors may refer to USDA's [CACFP Adult Day Care Handbook](#) for additional guidance. Please keep in mind the handbook was last updated in 2012 and may contain outdated information.

The adult day care program is a subsection of the Child and Adult Care Food Program (CACFP) that is available to operators of non-residential day care facilities serving persons who are 60 years of age or older and functionally impaired adults ([7 CFR 226.2 "Adult day care center"](#)).

A **functionally impaired adult** is defined as a chronically impaired disabled person aged 18 years or older, including victims of Alzheimer's disease and related disorders with neurological and organic brain dysfunction, who are physically or mentally impaired to the extent that their capacity for independence and their ability to carry out activities of daily living is markedly limited ([7 CFR 226.2 "Functionally impaired adult"](#)).

It is not necessary that the majority of the clients receiving care in the center be functionally impaired ([CACFP Memo 21-2012](#)). Examples of types of adult day service facilities that may participate in the CACFP are:

- Adult day service centers
- Support day care centers
- Adult day health centers
- Licensed Alzheimer's day care centers

CACFP eligibility requirements state that adult day care CACFP sponsors must operate primarily to provide day care to non-residential elderly and functionally impaired adults in order to avoid premature institutionalization. Simply providing services to frail and/or elderly adults (such as sheltered workshops, vocational or substance abuse rehabilitation centers, or social centers) does not meet CACFP requirements ([CACFP Memo 21-2012](#)).

Non-Profit Food Service

Centers receiving public funding are required to implement a financial management system which can show that other public funding is being used to support CACFP meals after the CACFP reimbursement has been exhausted. This ensures that CACFP funds are used for food service and not re-directed to other areas.

Additionally, an adult day care center purchasing meals from other commercial vendors must verify that the meals they are receiving are not also supported by another meal service program. Impacted centers are encouraged to preserve other public funding for services they administer outside the meal service and not allow alternative funding to interfere with the integrity of their CACFP claims ([CACFP Memo 21-2012](#)).

In short, CACFP funds must be used to cover food service costs rather than other organization expenses. Additionally, sponsors receiving meal reimbursement funds from multiple programs may only be reimbursed for single a meal from one program. A sponsor may not “double-dip” reimbursement for the same meal from multiple programs.

See [Chapter 7 Financial Management of the CACFP](#) for additional financial accounting requirements.

Section B – Eligibility Criteria

Sponsor Eligibility

The types of organizations serving non-residential functionally impaired or elderly adults that are eligible to participate in the CACFP are:

- Government organizations (public entities)
- Tribal authorities
- Private non-profit organizations
- Some for-profit organizations that meet the criteria set in [Chapter 19: For-Profit Programs](#)
- Residential facilities that serve meals to enrolled adults who live in the community and attend the facility for day care. **Note:** Individuals who reside in the facility *are not* eligible for participation.

Center Eligibility

Adult day care program sponsor centers must meet all the following eligibility criteria:

- Provide services to adults who are functionally impaired or over age 60.
- Provide community-based programs.
- Provide nonresidential services.
- Licensed and approved to provide adult day care services.
- Meet health, sanitation, and fire safety standards.

Participant Eligibility

Eligibility criteria for adult participants

- Adults who are 60 years of age or older or who are functionally impaired.
- All functionally impaired participants under 60 years of age must have an individualized plan of care maintained for them by the sponsor.
- Must reside in their own home or in the home of a family member, guardian, or other caregiver or reside in a group home that is **not** a residential care facility.

Meals served to the following adults are *not* eligible for reimbursement:

- “Drop-in” adults who eat meals at a center but are not enrolled to receive care at the center.
- Meals served to center volunteers, regardless of age, who help with the meal service or other center activities, unless they are enrolled at the center and meet CACFP eligibility requirements.
- Participants who reside in a residential facility.
- Individuals residing in an institution on a temporary basis for respite care, crisis intervention or other reasons.

Licensing/Approval

Adult day care centers must be licensed or approved by Federal, State, or local authorities to provide adult day care. Tribal authorities are considered local authorities ([CACFP Memo 21-2012](#)).

Confidential Income Statements for Adult Participants

Annually, adult day care program sponsors must determine participant eligibility categories of Free, Reduced-Price or Above-Scale. Eligibility category determinations are made based on income information provided by the participant or caregiver on

the [Confidential Income Statements \(CIS\)](#), except as noted in the section on [Exception to Using a CIS to Establish Free Eligibility](#).

Use the adult day care program versions of the [Confidential Income Statement form](#) and [Letter to Households](#). See also [Chapter 3 Participant Enrollment and Eligibility](#) for more information on Confidential Income Statements.

Adult participants are categorically eligible to be counted in the Free category if the CIS documents that the participant:

- Is a member of a SNAP household;
- Receives Supplemental Security Income (SSI);
- Receives Medicaid/Oregon Health Plan; or
- Receives food assistance through the Food Distribution Program on Indian Reservations (FDPIR).

For applicants submitting income information on a Confidential Income Statement (CIS) to determine eligibility, only the income of the participant, the participant's spouse, and the dependent children who reside with the participant, if applicable, must be included. A functionally impaired adult participant living with her/his parents or guardian/caregiver is considered a household of one, and only the participant's income is used to determine eligibility.

Adult participants who are categorically Free-eligible must provide a SNAP or FDPIR case number or SSI or Medicaid/Oregon Health Plan assistance identification number on the CIS. When a SNAP or FDPIR case number or SSI or Medicaid/Oregon Health Plan assistance identification number is provided on the CIS, the adult member signing the CIS is not required to provide the last four digits of their social security number ([7 CFR 226.2 "Documentation"](#)).

Exception to Using a CIS to Establish Free Eligibility

In lieu of a current, signed CIS, the sponsor may establish the adult participant's categorical Free eligibility based on information documented on the participant's center enrollment form when the following condition is met:

A legitimate benefit number for SNAP, FDPIR, SSI, or Medicaid/Oregon Health Plan must be documented on the enrollment form and the enrollment form must be dated and signed by the participant or the participant's guardian. Note: If an enrollment form with this information is used to determine Free eligibility, the form must be updated annually to adhere to yearly update requirements for income eligibility.

Questions and Answers for Determining an Adult Participant's Eligibility Category:

If a participant receives Social Security disability benefits, does this qualify her/him categorically Free-eligible for purposes of developing the One Month Enrollment Roster (OMER)?

No. Social Security disability benefits are not based on financial need like SSI benefits.

If a participant is receiving both Supplemental Security Income (SSI) and Social Security disability benefits, is s/he categorically Free-eligible for purposes of developing the OMER?

Yes. Participants receiving SSI are categorically Free-eligible regardless of any other benefits they are receiving.

If a potential participant is functionally impaired and cannot sign the *Confidential Income Statement (CIS)* for him/herself and a guardian is not available to sign the CIS, may a case manager at the Center sign the CIS form for the adult participant?

Yes, if the participant is categorically Free-eligible and the participant's file contains documentation of her/his categorical eligibility. This provision is to be used on a case-by-case basis. Sponsors may not use this method of approval for all participants. If the participant is not categorically Free-eligible, the CIS must be signed by the participant, the participant's guardian, or an adult household member.

Who must provide the last four digits of their Social Security Number (SSN) on an income-based CIS?

Applicants are required to submit the last four digits of the SSN of the primary wage earner responsible for the care of the participant. This could be the participant, or the participant's parent or guardian living in the participant's household and should be the SSN of the person signing the form.

One Month Enrollment Roster

Adult day care programs must develop a One Month Enrollment Roster (OMER).

Adult day care programs may use center enrollment records documenting categorical Free-eligibility in lieu of Confidential Income Statements when developing the OMER if **all** of the following conditions are met:

- The participant is categorically Free-eligible based on receipt of SNAP, Supplemental Security Income (SSI), Medicaid/Oregon Health Plan or Food Distribution on Indian Reservations (FDPIR) benefits; **and**
- The center enrollment document is dated and signed by the participant or guardian; **and**
- The participant's name as documented on the enrollment form is listed on the OMER roster.

Note: The required CACFP One Month Enrollment Roster form can be found on the [CNPweb](#) Packet page. See [Chapter 4 The One Month Enrollment Roster](#) for more information on the OMER.

Section C – Record Keeping Requirements

Adult day care programs in CACFP must maintain all general record keeping requirements stipulated in this manual. The following records must also be maintained:

- Enrollment document for each adult participant that shows the participant is enrolled in the center;
- Records on the age of each enrolled participant;
- Records showing that each participant under the age of 60 meets the functional impairment eligibility requirements established under the definition of *functionally impaired adult*;
- Records which document that qualified adult day care program participants reside in their own homes (whether alone or with spouses, children, or guardians) or in group living arrangements; and
- Records of individual plan of care for each enrolled functionally impaired participating adult.

Section D – Reimbursable Adult Meals

Reimbursement may be claimed for up to two meals and one snack, or two snacks and one meal for each eligible adult participant each day. Meals claimed for reimbursement must meet CACFP meal pattern and meal service requirements, and must be served to enrolled participants in an approved site. Sponsors must maintain

records documenting reimbursable meals. See [Chapter 5 Attendance and Meal Counts](#) and [Chapter 6 Meal Reimbursement Claims](#) for more information on recording and claiming reimbursable meals.

Adult Meal Requirements

All adult meals must meet the following requirements:

- Meals must meet USDA meal pattern requirements for adults and include all meal components in at least the minimum quantities listed on the Adult Meal Pattern Chart, which can be found on ODE CNP's [CACFP Meal Pattern and Menu Planning webpage](#).
- Meals may be prepared on site or transported to the site from a central kitchen located in another organization building.
- Meals may be purchased from a vendor when the vendor signs a Vended Meal Agreement (found on the CNPweb packet page) with the sponsor. See [Chapter 8 Procurement](#) for more information on vended meals.
- Meals must be served in a congregate setting.

Meal Components

The Adult Meal Pattern includes five components, or food groups, which make up the CACFP meal pattern requirements:

- Grains
- Meat/Meat Alternate
- Vegetables
- Fruits
- Fluid Milk

Meals must contain the following food components and food items:

Breakfast—three meal pattern components are required:

- Fluid Milk – 8 fl. oz. (one cup)
- Vegetable/Fruit or both – ½ cup
- Grains*– 2 ounce equivalents (oz. eq.)

*Two (2) ounces of meat/meat alternate may be substituted for the entire grain component up to three (3) times per week.

Lunch and Supper –five meal pattern components are required:

- Fluid Milk** – 8 fl. oz. (one cup)
- Grains – 2 oz. eq.
- Meat/Meat Alternate – 2 oz. eq.

- Vegetables - ½ cup
- Fruits*** - ½ cup

** Milk is optional for adults during the supper meal service only.

***Lunch and supper must include one fruit (1) and one (1) vegetable OR two (2) different kinds of vegetables.

Snack—two of the five meal pattern components are required:

Snacks must contain at least two of the five meal components:

- Fluid Milk - 8 fl. oz. (1 cup)
- Meat/Meat Alternate - 1 oz. eq.
- Vegetables - ½ cup
- Fruits - ½ cup
- Grains - 1 oz. eq.

Snacks with only two food items from the same component group are not reimbursable. For example, a snack made up of only turkey and cheese is not reimbursable. A snack made up of only a banana and apple juice is not reimbursable.

Only one of the two required components for a snack may be a beverage.

Additional Meal Pattern Requirements

The milk type served must be unflavored low-fat (1%) or fat-free (skim) milk, or flavored fat-free (skim) milk.

Six (6) ounces weight or ¾ cup (volume) of yogurt may be used to meet the equivalent of 8 ounces of fluid milk **once** per day when yogurt is not served as a meat alternative in the same meal.

Water is recommended to be served at meals or snacks when yogurt is substituted for milk.

See [Chapter 9 - Section E - Meal Accommodations](#) of this manual for information on nutritionally equivalent milk substitutes and medically-required accommodations.

Meal Pattern Flexibility During a Disaster—ODE CNP Approval Required

Child Nutrition Programs policies are designed to allow flexibility and support continuation of meal benefits to participants in disaster areas. There are existing flexibilities in meal service requirements and administrative procedures that make it

easier for sponsors to operate and respond to disaster situations. See [Chapter 9 – Section F – Special Situations](#).

Meal Component and Meal Service

Flexibility is allowed regarding time of meal service and, if applicable, use of offer versus serve. These modifications may be made *only* with ODE CNP approval.

If emergency conditions exist that prevent sponsors from obtaining fluid milk, ODE CNP may allow service of meals without milk or with an alternate form of milk, such as canned or dry milk [[7 CFR 226.20\(e\)](#)]. These modifications may be made *only* with ODE CNP approval. If you have questions regarding meal component or meal service flexibilities, contact your assigned Child Nutrition Specialist.

Section E: Other Meal Service Considerations

Ordering from a Central Kitchen or Vendor

When the sponsor is ordering food from a central kitchen or from a vendor and has a significant number of Program participants at the feeding site with documented medical needs for smaller portions, the following policy *may* apply:

Sponsors of adult day service centers may order less food than the amount needed to provide at least minimum meal pattern quantities of all components for all participants at the site under the following circumstances:

- The sponsor is using restaurant-style meal service; and,
- Valid Medical Statements (located on the [Child Nutrition Program Meal Accommodations and Modifications webpage](#)) are on file for specific participants prescribing portions smaller than required by the CACFP adult meal pattern.
 - The Medical Statement will be considered invalid if the dietary restriction and food substitution are not clearly described. For example, if the dietary restriction is simply stated as, “smaller portions,” the medical statement would be considered invalid. An example of valid dietary restriction statement would be:
 - Foods to be omitted: “Full serving sizes of each component.”
 - Foods to be substituted: “½ serving sizes of each component. Offer additional food if participant will take more.”

For more details on meal accommodations, review Chapter 9: [Section E – Meal Accommodations and Modifications](#).

Contact your assigned Child Nutrition Specialist if you have additional questions.

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Chapter 22: Pricing Programs

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Sponsors who plan to charge separately for meals (pricing program sponsors) must comply with all CACFP requirements found in the *USDA CACFP Center Manual*, except those superseded by the specific requirements for pricing programs found in this chapter. There are significant additional requirements for record keeping and administrative oversight that need to be carefully considered by a CACFP sponsor that is contemplating operation under the pricing program regulations.

Section A - Overview

Pricing programs, same as non-pricing programs, receive CACFP reimbursement for meals and snacks based on the percentage of participants who are categorized as Free, Reduced-Price, or Above-Scale on the One Month Enrollment Roster. See [Chapter 4 The One Month Enrollment Roster](#) for more information on the percentage reimbursement method.

Charging for Meals

A pricing program charges participants for meals unless the participant qualifies for Free meals. Participants not eligible for Free meals may be eligible for Reduced-Price meals. Pricing program sponsors may not charge participants eligible for Reduced-Price meals more than the following amounts specified by USDA ([7 CFR 226.2 "Reduced-price meal"](#)):

- \$0.30 for Breakfast
- \$0.40 for Lunch or Supper
- \$0.15 for Snack

Sponsors may charge participants not eligible for Free or Reduced-Price meals the full price for meals and snacks. Revenue earned from these meals is considered CACFP revenue and must be identified as such in the "Non-Profit Food Service Account." See [Chapter 7 Financial Management of the CACFP](#) for more information.

Sponsors who operate pricing program must have an approved *Pricing Program Policy Statement for Free and Reduced-Price Meals* (located on the [CNPweb](#) packet page). The policy statement must be submitted to ODE CNP for approval with the *CACFP State Agency-Sponsor Agreement* (also located on [CNPweb](#) packet page) during initial application. It is resubmitted for approval each year with annual renewals. At a minimum, the *Pricing Program Policy Statement for Free and Reduced-Price Meals* must include:

- The name, title, and address of a designated hearings official (this person must be someone not involved in the original eligibility determination)

- The specific criteria to be used in determining a participant's eligibility for Free or Reduced-Price meals
- The method used to distribute and collect *Confidential Income Statements Centers—charging for meals (CIS)* forms and *Letters to Households—Pricing Centers*
- The method used to collect meal payments from Reduced-Price-eligible participants that protects the anonymity of the participants' eligibility status
- An assurance that the institution has an appeal procedure when pricing program benefits are denied or terminated
- A description of the institution's hearing procedure
- An assurance of no overt identification of Free and Reduced-Price meal recipients
- An assurance of no discrimination based on protected classes as defined by USDA and the State of Oregon
- An assurance that the institution's Reduced-Price meal and snack fees will not exceed the USDA maximum allowed amounts for breakfast, lunch or supper, and snacks.

Section B - Determining Free and Reduced-Price Eligibility

Pricing programs must distribute [Confidential Income Statement](#) (CIS) forms together with the *Letter to Households—Pricing Centers* to all participants at the time of their enrollment. ODE CNP updates these forms and letters annually. The CIS form can be found on ODE CNP's [ODE CNP CACFP Page](#) under the Child Care Center Sponsors and Adult Day Care Home Sponsors headings. The *Letter to Households - Pricing Centers* can be found on the Packet tab of [CNPweb](#).

After completed CIS forms are submitted to the sponsor, the sponsor must determine the household's eligibility for Free or Reduced-Price meals and must notify the enrollee's household of the eligibility determination. Participants who enroll and are determined eligible for Free or Reduced-Price meals must receive their meals free or at a reduced-price, as applicable. See [Chapter 3 Participant Enrollment and Eligibility](#) for more information on CIS forms and determining eligibility for Free or Reduced-Price meals.

Sponsors must maintain a One Month Enrollment Roster (OMER) listing all enrolled participants and their eligibility categories (Free, Reduced-Price, or Above-Scale) each month meals are claimed for reimbursement. The OMER Excel document can be found on ODE CNP's [ODE CNP CACFP Page](#) under the One Month Enrollment Roster (OMER) heading.

The sponsor's unique reimbursement rate is based on the Free, Reduced-Price, and Above-Scale percentages developed from the OMER submitted in October each year. The claiming percentages and unique reimbursement rate do **not** change when new participants enroll unless the pricing program is approved by ODE CNP to update the Center's OMER. If the sponsor wants to request an OMER change due to a significant number of new enrollees, the sponsor should submit a written request to their assigned Child Nutrition Specialist for approval along with a copy of the new OMER to validate the change in Free, Reduced Price and Above Scale totals. See [Chapter 3 Participant Enrollment and Eligibility](#) for more information on the OMER.

Section C - Household Notification of Benefits Determination

Within 10 days of receipt of a completed CIS, pricing programs must notify the applicant's household of the eligibility determination results in writing, using the *Pricing Program Notification Letter*, which can be found on ODE CNP's [CACFP Resources](#) webpage under the "Pricing Programs" heading.

Whenever Free or Reduced-Price benefits are denied, the applicant's household must also be notified in the letter of their right to appeal the determination by including the ODE CNP-approved Pricing Program's hearing procedure with the *Pricing Program Notification Letter*.

When the sponsor determines a participant is ineligible for Free or Reduced-Price benefits, the reason for ineligibility should be properly documented and retained on file. The written notice must include the following information, which is included in ODE CNP's *Pricing Program Notification Letter*:

- The reason for denial of benefits (for example, household income greater than *USDA Income Eligibility Guidelines* - located on ODE CNP's [CACFP Resources](#) webpage under the Child Care Sponsors or Adult Day Care Home Sponsors heading, or incomplete CIS submitted).
- Notification of the right to appeal.
- Instructions on how to appeal.
- The name, title, and address of the hearings official listed in the Sponsor's *Pricing Program Policy Statement for Free and Reduced-Price Meals*
- A reminder that parents/guardians or adult participants may reapply for Free or Reduced-Price benefits at any time during the year.

Section D - Appeal Procedure

A household that wishes to appeal the denial of Free or Reduced-Price meal benefits in a pricing program may do so under the hearing procedures as outlined in the sponsor's *Pricing Program Policy Statement for Free and Reduced-Price Meals*. Prior to initiating the hearing procedure, the household may request a conference to discuss the situation, present information, and obtain an explanation of the information submitted or the decision rendered. The request for a conference may not prejudice or diminish the household's right to a fair hearing.

If a hearing is requested by a household denied Free or Reduced-Price benefits, the sponsor must promptly schedule a fair hearing. The hearing must be scheduled with consideration for convenience to the household and adequate notice must be given to the household as to the time and place of the hearing.

Section E - Verification Procedure

Federal regulations require ODE CNP to conduct verification of eligibility for Free and Reduced-Price benefits in pricing programs once every three years. ODE CNP conducts verification of the income information provided on a sample of CIS forms approved for Free or Reduced-Price meal benefits in Pricing Programs.

The verification procedure is as follows:

1. ODE CNP contacts the pricing program sponsor and requests a list of all participants who receive Free or Reduced-Price meals
2. ODE CNP selects a sample of the participants
3. The sponsor submits to ODE CNP the addresses of the selected participants and copies of the participants' approved CIS forms
4. ODE CNP sends a letter to each of the selected participant households informing the household that they have been selected for verification and that they are required to submit verification information to confirm their eligibility for Free or Reduced-Price benefits by a deadline set by ODE CNP to continue to receive Free or Reduced-Price meal benefits. The letter contains contact information for an ODE CNP Child Nutrition Specialist who can answer questions and assist the household in the verification effort if assistance is needed.

The verification selection letter for Child Care Centers asks the household to submit:

- Social Security numbers of all adult members of the household and documentation showing the household income; or,
- Documentation that the child is a member of a currently certified SNAP, TANF household or receive FDPIR

The verification letter for Adult Day Care Centers asks the household to submit:

- Social security numbers of all adult members of the household and documentation showing the household income; or,
- Documentation that the adult participant is a member of a currently certified SNAP or FDPIR household; or,
- Documentation that the adult participant is currently certified to receive SSI or Medicaid benefits.

5. Once documentation is received from the household and reviewed, ODE CNP sends a letter to the household informing them of the verification outcome.

The verification process results in one of two outcomes:

- The household eligibility to receive Free or Reduced-Price meal benefits as approved by the Sponsor is verified and benefits will continue unchanged;

OR

- Free or Reduced-Price benefits are denied or reduced based on documentation submitted by the household. If benefits are denied or reduced, the household is notified of their right to appeal the decision.

6. If the household refuses to cooperate with efforts to verify, ODE CNP will require the pricing program sponsor to terminate Free or Reduced-Price eligibility. ODE CNP will send the uncooperative household a letter terminating pricing program benefits and notifying the household of their right to appeal the decision.
7. ODE CNP sends a letter to the sponsor summarizing the results of the verification process and listing eligibility changes to be made, if any.
8. If a household appeals the verification decision, the participant must continue to receive Free or Reduced-Price meal benefits during the appeal process up until the hearing official renders a final decision.
9. The decision of the hearing official is final. No other appeal recourse is available to participants.

Section F – Public Media Release Statement

Federal regulations require a public media release annually to local news media serving the area from which pricing programs draw their attendance. ODE CNP submits a statewide public release to the news media at the beginning of the fiscal year for all currently participating pricing program sponsors.

Sponsors approved to operate a pricing program after October 1 (after ODE CNP has published its annual public news release) must submit a public media release to the local news media within their center's attendance area.

The public media release must include:

- The current USDA Income Eligibility Guidelines
- The availability of Free or Reduced-Price meals to participants meeting the approved eligibility criteria
- The approved USDA non-discrimination statement
- *For Child Care Centers:* the media release must include a statement that participants who are members of households receiving SNAP, TANF or FDPIR are automatically eligible to receive Free meal benefits
- *For Adult Day Care Centers:* the media release must include a statement that adult participants who are members of SNAP or FDPIR households or who are receiving SSI or Medicaid benefits are automatically eligible to receive Free meal benefits.

Sponsors are not required to pay for publication of the release and there is no requirement for the media to publish the news release. Sponsors fulfill their responsibility by providing the news release to the media.

Pricing program sponsors who begin operations mid-year should document their compliance with the public media release requirement by keeping a copy of the news release submitted to the local media with date(s) sent and name(s) of media to whom it was mailed.

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Section A – Overview

A Single Audit is a rigorous audit of non-profit organizations performed by an independent party (accounting firm/CPA). The format of the audit is based on uniform guidance ([2 CFR Part 200 subpart F](#)), so all audits are consistent in information reviewed and the format of the information presented.

The single audit's purpose is to assure the government of the management and use of Federal funds by the recipient. It includes financial and compliance components. The objective of an audit is for the independent auditor to evaluate the integrity of an organization's financial data. The auditor reviews financial statements for accuracy, for compliance with GAAP (generally accepted accounting principles), and internal control systems in place.

Section B- Audit Requirements

As of October 1, 2024, sponsoring organizations that **expend** \$1,000,000 or more in Federal funds (note that both CACFP and SFSP are sources of Federal funds) during their fiscal year are required to post a Single Audit on the Federal Audit Clearinghouse within 9 months of the close of their fiscal year. During renewals, in CNPweb on the *Sponsor Information Sheet*, sponsors are required to report if they have spent more than \$1,000,000 in Federal funds during the previous fiscal year. Uniform guidance regulations identify pass-through agencies of Federal funds as responsible for oversight of single audits. As a pass-through agency, ODE is responsible for providing audit technical assistance, ensuring audits are submitted timely, and following up on audit findings.

Section C – Audit Reports and Findings

Auditor Reports include:

- Independent auditor's report on the financial statements, which expresses an opinion on whether the financial statements are presented fairly in all material respects in conformity with the stated accounting policies.
- Independent auditor's report on the supplementary Schedule of Expenditures of Federal Awards (SEFA), which should determine and provide an opinion on whether the SEFA is presented fairly in all material respects in relation to the sub-recipient's financial statements taken as a whole. This report can be

- issued separately or combined with the independent auditor's report on financial statements.
- Report on internal control over financial reporting, compliance, and other matters based on an audit of financial statements performed in accordance with Government Auditing Standards (GAS).
 - Report on compliance with requirements applicable to each major program and report on internal control in accordance with the circular.
 - Schedule of findings and questioned costs.

Audit findings may be issued for: Financial statements, internal control over financial reporting, internal control over compliance, compliance with major programs, SEFA, or other uncommon findings such as questioned costs over \$25,000 or suspected fraud.

- A material weakness finding is severe; it is a deficiency or combination of deficiencies.
- A significant deficiency is less severe than material weakness but important enough to bring attention to.

Section D- CACFP/SFSP Funds and the Single Audit

Every Federal program is assigned an Assistance Listing number . The Assistance Listing number for CACFP is 10.558 and SFSP is 10.559. The Assistance listing numbers are reported on the SEFA. The SEFA report identifies all federal programs in which the sponsor participated and the amount of funds that were expended for each federal program. ODE CNP reviews information on the SEFA report to payment information in CNPweb. If a sponsor received CACFP and/or SFSP funds and the Assistance Listing number is not included on the SEFA, or if the amount expended is significantly less or more than the amount received, the ODE CNP Finance & Audit Specialist will contact the sponsor to seek additional information. Based on the information provided, sponsors may be required to revise the SEFA.

Section E- Audit Communications

Each fiscal year before the single audit due date, ODE CNP staff will send single audit reminder emails to sponsoring organizations who must submit a single audit. ODE CNP reviews information entered in the *Sponsor Information Sheet* of CNP web and

previously submitted single audits to identify sponsoring organizations that will receive reminder emails.

Sponsors must notify ODE CNP via e-mail when the single audit has been submitted to the Federal Audit Clearinghouse **and** if it contained any reportable conditions for Assistance Listing numbers 10.558 and/or 10.559. A copy of the single audit is not required to be submitted; ODE CNP will access the audit posted on the Federal Audit Clearinghouse website.

If the single audit is delayed and will not be submitted to the Federal Audit Clearinghouse within the regulatory due date, sponsors must communicate this to ODE CNP and continue to stay in communication providing a status update until the audit is posted on the Federal Audit Clearinghouse. Sponsors that fail to respond to ODE CNP and or provide additional information as requested may be determined to be seriously deficient in the operation of the CACFP.

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Section A – Administrative Reviews

Under USDA regulation [7 CFR 226.6\(m\)\(6\)\(i\)](#) Administrative Reviews of all sponsors with less than 100 facilities must be conducted at least once every 3 years. ODE CNP will conduct an administrative review of new institutions that are sponsoring organizations of five or more facilities within the first 90 days of Program operations.

The purpose of the Administrative Review is to measure the sponsor's Program to State and Federal standards; assess agency viability, accountability, and capability; and to follow-up on any previous Administrative Review findings to ensure the sponsor fully and permanently implemented the required corrective actions. The Administrative Review is not intended to discover all possible program deficiencies and any omission from the Administrative Review report does not mean that those deficient practices are acceptable.

ODE CNP reviews sponsor level and site-level compliance. Sponsor level reviews may be announced or unannounced. All site level reviews are conducted as unannounced reviews. ODE CNP policy is to conduct 15% of all reviews annually as unannounced and selects the sponsors to receive unannounced reviews through random assignment and/or red flags. Unannounced reviews begin immediately once the sponsor is notified that an unannounced administrative review is occurring either on-site in person or virtually.

If the sponsor-level administrative review is announced, ODE CNP will send the sponsor a review confirmation letter with a list of documents that must be available at the time of the review. If the sponsor-level administrative review is unannounced this list of documents will be provided during the entrance conference.

There are six parts to the administrative review:

1. Entrance interview
2. Records review and site visit(s)
3. Meal observation(s)
4. Exit conference
5. Financial assessment (if needed)
6. Corrective action (if needed)

ODE CNP recommends that sponsors actively evaluate their management of the CACFP on an on-going basis. Ideas for self-monitoring include:

1. Unannounced site monitoring visits including meal observations, even if a single-site sponsor
2. Periodic comparison of food receipts and menus

3. Periodic milk studies comparing milk purchased with number of meals claimed

Entrance Conference

The purpose of the entrance conference is for ODE CNP and the sponsor staff to discuss the administrative review process and conduct introductions. During the conference ODE and sponsor staff will discuss the review schedule, ensure all review documents are available to ODE staff and ODE staff understand them, and discuss challenges the sponsor or ODE staff have that may impact the review.

Records Review

Depending on the size and complexity of the program, the records review may take one or more days. The records review will include:

1. **Approval**

For all sponsors ODE will review/confirm site approval requirement documentation as applicable.

- a. Child Care Licensing Division (CCLD) licensed or registered sites: ODE CNP reviewers will look at each site's current CCLD licensure.
- b. "Other Federal, State or Local approval" sites: ODE CNP reviewers will verify sites by program type.
- c. "Alternate Approval" sites: ODE CNP reviewers will review the sponsor's current Sanitation and Fire/Safety inspection reports to make sure the sites are in compliance with local fire and sanitation requirements.

2. **Enrollment and Income Eligibility Determination**

For all sponsors required to collect Enrollment and Income Eligibility documentation ODE CNP will review:

- a. Validation of the One Month Enrollment Roster (OMER) as reported on the Sponsor's first claim month of the fiscal year for the test site. (Not applicable to reviews of At-Risk Afterschool programs, emergency shelter programs and Head Start programs that do not claim meals for siblings or community slots)
 - i. ODE CNP reviewers will recreate the OMER that was developed for the first claim month of the fiscal year for the test site as applicable.
- b. Confidential Income Statements and other eligibility documentation as applicable will be examined for completeness and accurate eligibility determination. .
- c. CACFP Child Enrollment forms or ODE approved sponsor enrollment documentation will be examined for completeness.

3. **For-Profit Sponsor Eligibility (if applicable)**

The ODE CNP reviewers will evaluate the monthly For- Profit eligibility rosters for the test month. In addition, they will review all required documentation to validate the eligibility roster. See [Chapter 18 For- Profit Programs](#).

4. **Pricing Programs (as applicable)**

ODE CNP reviewers will verify that the following documentation is on file and accurate.

- a. Current *Pricing Program Policy Statement*
- b. CACFP Roster of all free and reduced-price eligible participants

5. **Test Month Claim Validation**

ODE CNP reviewers will announce the test month during the review announcement notice, confirmation email and required document checklist. If the review is unannounced the sponsor will be notified of the test month during the entrance conference. The reviewer(s) will inspect:

- a. Meal counts for the test month for all sites and complete a five-day reconciliation for the test site, at a minimum.
- b. Daily attendance records for completeness and accuracy to support test month meal counts.

6. **Menu Records Review**

For all sponsors, ODE CNP reviewers will review menus and menu supporting documentation. ODE CNP reviewers will:

- a. Verify that meals served in the test month met CACFP meal pattern requirements by reviewing all required menu records and documentation including working menus, recipes, menu production records, ingredient lists, CN Labels, Product Formulation Statements (PFS), and standard of identity labels
- b. Review Medical Statements for all meal substitutions that do not meet CACFP meal pattern
- c. Review Meal Preference Request Forms for all meal substitutions within the CACFP meal pattern
- d. Review itemized goods and services receipts to verify that food purchases substantiate documented menus

7. **Non-Profit Food Service (NPFS) Review**

- a. ODE CNP reviewers verify that sponsors have written fiscal policies and procedures that are sufficient to ensure compliance with maintaining

NPFS, that CACFP revenue and expenses are tracked separately from organizational revenue and expenses, that only allowable costs per the approved annual CACFP budget and supported by source documents are charged to CACFP funds and all unspent funds remain in the NPFS account. Refer to [Chapter 7 Financial Management of the CACFP](#) and [Chapter 8 Procurement](#) for detailed information on NPFS requirements. Financial system records that support the sponsors system for tracking CACFP income and expenses separately from organizational income and expenses will be required.

- b. A report from the sponsor's accounting system that documents CACFP revenue and expenses for the test month.
- c. Documentation for all income generated from activities supported by the CACFP.
 - i. Invoices and receipts to support income received from the sale of meals to other organizations (vended meals), income received from the sale of meals to above scale and reduced-price eligible participants (pricing programs only), income received from the sale of meals to non-program adults.
- d. Documentation to support all expenses charged to CACFP funds are allowable, included in the approved budget, support CACFP menus
 - i. Itemized receipts, invoices and purchase orders for goods and services
 - ii. Documentation of labor costs
 - 1. Timesheets
 - 2. Time and attendances reports
 - 3. Payroll records
 - iii. Mileage
- e. Cancelled checks
- f. Bank statements
- g. Itemized receipts or other records for food donations and any service fees associated with donated foods (e.g., foods and non-food items from the Oregon Food Bank or food pantries), if applicable.
- h. Written Financial Management Policy and Procedures specific to the CACFP that include the following:
 - i. Fiscal integrity of all Program funds
 - ii. 2. Program funds are only used for authorized Program purposes
 - iii. 3. Accountability of all expenses
 - iv. 4. CACFP administrative costs do not exceed the regulatory limits, and
 - v. 5. Safeguards are in place to prevent improper financial activities

Note that [7 CFR 226.7\(b\)\(1\)](#) requires State agencies to conduct an annual financial management review, including a review at least one month of bank account activity, expenditures, and fund documentation and review of the sponsor's non-profit status. This is conducted through the NPFS Review for sponsors receiving a full administrative review. Per [CACFP 09-2024: Implementation Guidance: State Agency Financial Review Requirements](#), this annual financial management review does not apply to single-site sponsors and school food authorities (SFAs), although a NPFS review will still be conducted for all non-SFA single-site sponsors.

8. Milk Study

ODE CNP reviewers will review milk receipts and invoices and will calculate the amount of milk purchased during the test month. The amount purchased will be compared to the amount needed for the meals claimed for reimbursement during the test month (based on number of meals served and minimum portion sizes). The option of Family-style meal service and the "Offer Versus Serve" option in adult programs and School Food Authorities that operate At-Risk Afterschool Programs will be taken into consideration when ODE CNP conducts the milk study.

9. Civil Rights Compliance

For all sponsors ODE CNP reviewers will evaluate the Civil Rights policies and procedures in place to ensure all Civil Rights requirements are met. ODE CNP reviewers will:

- a. Check to see if the "And Justice For All" posters are displayed where parents, adult participants and the public can see and read them easily, and that the non-discrimination complaint procedures are published on required materials.
- b. Check to see if the Sponsor's staff is trained in receiving Civil Rights complaints and that all Civil Rights complaint procedures are in place as required.
- c. ODE CNP reviewers will verify that the Annual Racial-Ethnic Reporting Requirements have been met.
- d. ODE CNP reviewers will verify that all CACFP program materials, including webpages, include either the current NDS long version or a link directly to the NDS statement.
 - i. If the sponsor does not have a program webpage, a link directly to the NDS statement must be on the home page of the sponsor's website.
- e. ODE CNP reviewers will check to see that sponsors notify applicants with disabilities and LEP persons of their right to free language

assistance and accommodations and provide these services upon request.

- i. Notification of resources may be posted to the sponsor's program webpages, included in enrollment information, or sent out via program communications to the public.

10. Staff Training

For all sponsors, ODE CNP reviewers will evaluate staff training documentation for timely completion and adequate documentation that staff have received and implemented training on all CACFP requirements relevant to their job duties. ODE CNP reviewers will review

- a. Documentation of annual sponsor internal training and new staff training on CACFP procedures.
- b. ODE CNP reviewers will observe the sponsor's CACFP staff to assess their understanding of their CACFP duties and the effectiveness of the sponsor's training.

11. Site Monitoring

For multi-site sponsors, ODE CNP reviewers will evaluate site monitoring review reports for completion, thoroughness, and frequency. ODE CNP reviewers will verify:

- a. The required number of site monitoring reviews were performed in the current and previous fiscal year.
- b. The site monitoring reviews were documented and that review reports are thoroughly completed, signed and dated
- c. That at least two of the required three site monitoring reviews at each sponsored site were unannounced
- d. Corrective actions and follow-up procedures administered by the sponsor to a site were thoroughly documented and that corrective actions were effective
- e. Staff who conduct site monitoring reviews have been trained on site monitoring duties before completing monitoring reviews and a minimum of annually thereafter.

12. Program Administration

The ODE CNP reviewers will evaluate the following areas:

- a. The Building for the Future Flyer is displayed in area visible to participants and potential participants

- b. WIC information is distributed (At-Risk Afterschool and adult day care centers are exempt)
- c. Sponsor made all records and accounts available to the reviewer upon request
- d. Sponsor maintains all correspondence and guidance issued by ODE CNP
- e. Sponsor maintains all required CACFP records for three years plus the current operating year (7CFR 220.10(d))
- f. Sponsor demonstrates adequate administrative oversight

13. CACFP Policies and Procedures

ODE CNP reviewers will verify that the sponsor's written CACFP policies and procedures are current, fully implemented, and result in the compliant execution of the CACFP program.

Meal Observation

Unannounced meal observations may occur several weeks or months prior to, during or after, the administrative review. Reviewers may observe meals at one, several, or all sites.

During the meal observation, ODE CNP reviewers will:

1. Evaluate compliance with meal pattern and portion size requirements
2. Evaluate meal service style
3. Check attendance and meal count procedures
4. Check safety and sanitation procedures
5. Evaluate compliance with Civil Rights requirements
6. Check Medical Statement s or Meal Preference Request Forms are on file to support menu substitutions.
7. Evaluate effectiveness of staff training and site monitoring
8. Review CCLD license for compliance, if licensed.

Exit Conference

ODE CNP will conduct virtual exit conferences within 10 calendar days of the end of the active review period. An active review period may conclude at the end of the onsite review, or there may be additional items that are reviewed as a desk review. The assigned Child Nutrition Specialist will work with the sponsor to determine a time that works best for the sponsor staff

responsible for CACFP operations who must attend, and all other sponsor staff who will attend the exit conference. On occasion, when time allows, an exit conference may be conducted on-site, at the agreement of the sponsor and specialist.

During the on-site portion of the review, Specialists will continue to meet with the Food Program Coordinator each day to inform them of the review's status.

The ODE CNP reviewer will report on program strengths, findings, required corrective actions, technical assistance provided and recommendations. At the exit conference the ODE CNP reviewer will issue a *Final Administrative Review Report*.

Section B – Investigations

ODE promptly investigates complaints received or irregularities noted in connection with the operation of the Program and takes appropriate action to correct any irregularities in accordance with [7 CFR 226.6\(n\)](#). An investigation is a review of a sponsor's administrative or operational procedures or practices to confirm compliance with Federal program regulations. Investigative reviews may involve the following as necessary:

- A focused review of specific aspects of the program
- A full administrative review
- A desk audit of program records
- An on-site in person review of program records and operation

Investigative reviews are conducted as unannounced reviews and may review both current and previous year's program records. Similar to an unannounced administrative review, if ODE determines that an investigative review is necessary, sponsors will be contacted by ODE either virtually or in person and the review will begin immediately.

Depending on the results of the investigation, ODE will issue a full Investigative Review Report notifying the sponsor of the findings and required corrective actions or provide technical assistance.

Section C – Findings and Corrective Actions

An administrative review, audit, or other review may discover findings. Findings are areas of non-compliance with Federal regulations or State Agency (ODE CNP) policies. When findings are identified as part of an audit or administrative review, the sponsor must fully and permanently correct the findings within required timeframes.

Administrative Review Report

Findings and required corrective actions will be described in detail in the *Administrative Review Report* that will be issued to the sponsor official who is on file with ODE CNP as the sponsor's Authorized Representative or Food Program Coordinator as listed in CNPweb or their designee. This report will be issued during the exit conference and must be signed by all staff present. A copy of the report will also be sent to the board chair of non-profit organizations and School Boards or business owners who are not present during the exit conference.

Adverse Actions and Financial Assessments

Adverse actions are any actions that has a negative financial impact on an organization. If findings reveal the sponsor claimed reimbursement for meals without adequate documentation to demonstrate CACFP compliance or had errors affecting the reimbursement rates, ODE CNP will require the sponsor to pay back funds to ODE CNP. This is called a "financial assessment." Sponsors are notified of any financial assessments during the exit conference and are provided with the appeal procedure. Once the appeal period has ended, fiscal action will be applied. Additional information on the appeal process can be found in Chapter 26.

If the sponsor continues CACFP participation and owes \$600 or more, ODE CNP will recuperate overpayments through the reimbursement claim process. If the sponsor does not continue participation in the CACFP, ODE CNP will bill the sponsor for funds owed. If owed funds are not paid, ODE CNP will collect funds through the Department of Revenue or the Department of Justice collection.

Costly errors that may result in a financial assessment could include, but not limited to:

1. One Month Enrollment Roster (OMER) errors
2. Claiming meals for children who do not have current CACFP Child Enrollment forms on file
3. Claiming meals for a month the sponsor is not eligible
4. Attendance records are incomplete or otherwise do not support meal counts
5. Meal count records were incomplete or missing
6. More than two meals and one snack or two snacks and one meal were claimed per participant per day
7. Observed meals did not meet CACFP meal pattern requirements for components, portion size, or meal service style
8. Meals with substitutions for required components were claimed without completed Medical Statement or Meal Preference Request Form on file
9. Menus did not document all required meal pattern food components

10. Menu documentation does not demonstrate compliance with meal pattern requirements
11. Milk study identified insufficient quantities of milk were served
12. Food receipts did not support menus
13. Required, supporting records were not maintained and available for review
14. Inaccurate records

Additional adverse actions can also include requiring non-profit food service account reimbursement when CACFP funds are used to cover non-allowable costs.

Sponsors may appeal all adverse actions following the appeal procedure issued with the ODE CNP Final Review Report. See Appeal Procedures located in the Packet Tab of [CNPweb](#).

Corrective Action

Corrective actions are those actions ODE CNP requires the sponsor to take to correct the non-compliance findings. Corrective action must be submitted and implemented by the due date listed in the *Administrative Review Report*.

The sponsor may be required to take the following corrective actions:

1. Develop and implement systems or procedures to demonstrate compliance with Federal regulations or state policy
2. Submit other required documents
3. Other corrective action as deemed necessary by the review findings

Required corrective actions will always include submitting to ODE CNP a written plan that clearly describes how the sponsor will correct all noncompliance findings. The written plan must describe ways the sponsor will permanently and fully correct the areas of non-compliance. Corrective actions must also be implemented effectively.

ODE CNP may require sponsors to submit supporting evidence with the corrective action plan, such as copies of Confidential Income Statements, Enrollment Rosters, staff training documentation, site monitoring reports, menus, CN Labels or Product Formulation Statements (PFS) or recipes, attendance records, meal count forms, or itemized food receipts.

Responding to Corrective Action

The sponsor must submit a written response to findings and required corrective actions by the due date listed in the *Administrative Review Report* (typically within 30 days of the receipt of *Administrative Review Report*). Occasionally, ODE CNP may determine that a shorter or longer response due date is required.

The intent of the corrective action is to address and fix any system failures in the current system by revising and implementing a new process. Corrective actions should be written in a way someone unfamiliar with the process would be able to carry out the tasks following the written plan. The corrective actions may be used as part of the Sponsor's written policy and procedures for the CACFP.

An adequate corrective action addresses Who, What, How, When, and Where the finding will be remedied.

- **What** processes and procedures will be implemented to correct?
- **Who** will carry out the process? Is ultimately responsible for implementing the process and internal controls?
- **How** will the facility ensure the processes and procedures are followed consistently to prevent recurrence?
- **When** will the processes and procedures be implemented? When will they be assessed?
- **Where** will the documentation for the processes, procedures, and other documentation requirements be retained?

When a thorough and complete response is submitted and accepted, ODE CNP will issue written notification that the administrative review is closed. Failure to submit a timely response will result in the sponsor being categorized as "Seriously Deficient" in the operation of CACFP.

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Chapter 25: Serious Deficiencies, Suspensions, and Terminations

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Section A: Serious Deficiencies

If ODE CNP determines that the sponsor is out of compliance in an area cited in the Federal regulations as a *Serious Deficiency* and/or the sponsor is significantly out of compliance in a specific area or areas, ODE CNP will notify the program in writing that it is *Seriously Deficient* in the operation of the CACFP. Federal regulations governing *Serious Deficiency* in the operation of the CACFP use some specific terms not found in other places in this manual. The following terms apply to Serious Deficiencies and the *Seriously Deficient* process:

1. **Institutions:** The entity (organization) that signs the agreement with the State agency to operate the CACFP (*State Agency-Sponsor Agreement* - Located on the [CNPweb](#) Packet page)
2. **Responsible Principals (RP):** The sponsor's Authorized Representative, Food Program Coordinator, Financial Office Representative, the institution's Executive Director, Board Chair, For-Profit business owners, managers, officers, board members and any other Principals who were responsible for program operations or should have known about a *serious deficiency*.
3. **Responsible Individuals (RI):** Non-principal individuals (including volunteers and contractors) associated with the institution's operation of the CACFP who bear some responsibility for a *serious deficiency*.
 - a. An RP/I may be a current or former employee. Though no longer employed by the institution, an individual may still be responsible for the serious deficiencies by his or her actions prior to leaving the institution ([7 CFR 226.2](#) and [CACFP Memo 14-2012](#), Child and Adult Care Food Program Guidance on the Serious Deficiency Process and Acceptable Corrective Action Plans, National Disqualified List Procedures and Debt Collection, May 1, 2012).

The following is the regulatory list of grounds for a *Seriously Deficient* determination. Sponsors, their Responsible Principals, and Responsible Individuals will be classified *Seriously Deficient* if any of the following occurs. Note that the regulation language specifies that the list is NOT exhaustive. Refer to [CFR 226.6\(c\)\(3\)\(ii\)](#) for the complete language. The following list briefly describes *Serious Deficiencies* for Participating Institutions:

1. Submission of false information on the institution's application, including but not limited to a determination that the institution has concealed a conviction for any activity that occurred during the past seven years and that indicates a lack of business integrity. A lack of business integrity includes fraud, antitrust violations, embezzlement, theft, forgery, bribery, falsification or destruction of

- records, making false statements, receiving stolen property, making false claims, obstruction of justice, or any other activity indicating a lack of business integrity as defined by the State agency;
2. Permitting an individual who is on the National Disqualified List to serve in a principal capacity with the institution or, if a sponsoring organization, permitting such an individual to serve as a principal in a sponsored center or as a day care home;
 3. Failure to operate the Program in conformance with the performance standards set forth in paragraphs (b)(1)(xviii) and (b)(2)(vii) of CFR 226.6(c)(3)(ii);
 4. Failure to comply with the bid procedures and contract requirements of applicable Federal procurement regulations;
 5. Failure to return to the State agency any advance payments that exceeded the amount earned for serving eligible meals, or failure to return disallowed start-up or expansion payments;
 6. Failure to maintain adequate records;
 7. Failure to adjust meal orders to conform to variations in the number of participants;
 8. Claiming reimbursement for meals not served to participants;
 9. Claiming reimbursement for a significant number of meals that do not meet Program requirements;
 10. Use of a food service management company that is in violation of health codes;
 11. Failure of a sponsoring organization to disburse payments to its facilities in accordance with the regulations at § 226.16(g) and (h) or in accordance with its management plan;
 12. Claiming reimbursement for meals served by a for-profit childcare center or a for-profit outside-school hours care center during a calendar month in which less than 25 percent of the children in care (enrolled or licensed capacity, whichever is less) were eligible for free or reduced-price meals
 13. Claiming reimbursement for meals served by a for-profit adult day care center during a calendar month in which less than 25 percent of its enrolled adult participants were title XIX beneficiaries;
 14. Failure by a sponsoring organization of day care homes to properly classify day care homes as tier I or tier II in accordance with § 226.15(f);
 15. Failure by a sponsoring organization to properly train or monitor sponsored facilities in accordance with § 226.16(d);
 16. Use of day care home funds by a sponsoring organization to pay for the sponsoring organization's administrative expenses;
 17. Failure to perform any of the other financial and administrative responsibilities required by CFR 226.6(c)(3)(ii);

18. Failure to properly implement and administer the day care home termination and administrative review provisions set forth at paragraph (I) of CFR 226.6(c)(3)(ii) and § 226.16(I);
19. The fact the institution or any of the institution's principals have been declared ineligible for any other publicly funded program by reason of violating that program's requirements. However, this prohibition does not apply if the institution or the principal has been fully reinstated in, or is now eligible to participate in, that program, including the payment of any debts owed;
20. Conviction of the institution or any of its principals for any activity that occurred during the past seven years and that indicates a lack of business integrity. A lack of business integrity includes fraud, antitrust violations, embezzlement, theft, forgery, bribery, falsification, or destruction of records, making false statements, receiving stolen property, making false claims, obstruction of justice, or any other activity indicating a lack of business integrity as defined by the State agency; or,
21. Any other action affecting the institution's ability to administer the Program in accordance with Program requirements.

Seriously Deficient Sponsors

ODE CNP will notify sponsors in writing if they are Seriously Deficient in the operation of CACFP. A notice will be issued to the organization, the *Responsible Principals* and *Responsible Individuals* associated with the *Serious Deficiency*. *Seriously Deficient* Sponsors and their *Responsible Principals* and *Responsible Individuals* will be issued a notice of *Serious Deficiency*. *Seriously Deficient* sponsors will be provided with the opportunity to take corrective action. At the same time this notice of *Serious Deficiency* is issued, ODE CNP will add the sponsor to the *Oregon Seriously Deficient List* in addition to the basis for the *Serious Deficiency* determination.

The *Serious Deficiency* notice will specify:

- The specific *serious deficiency(ies)*;
- Actions to be taken to correct the *serious deficiency(ies)*;
- Time allotted to correct the *serious deficiency(ies)*;
- The *Serious Deficiency* determination is not subject to administrative review (appeal);
- That failure to fully and permanently correct the *serious deficiency(ies)* within the allotted time will result in ODE CNP's proposed termination of the institution's agreement and the proposed disqualification of the institution and the Responsible Principals and Responsible Individuals; and
- That the institution's voluntary termination of its agreement with ODE CNP after having been notified that it is *Seriously Deficient* will still result in the

institution's formal termination by ODE CNP and placement of the institution and its Responsible Principals and Responsible Individuals on the National Disqualified List.

Within approximately two weeks of the issuance of the notice of *Serious Deficiency* ODE CNP will provide technical assistance to assist the sponsor in determining how to fully and permanently correct the *Serious Deficiencies*. Technical assistance will be provided in-person and/or via virtual meetings, phone, or e-mail.

Seriously Deficient sponsors must develop and implement a written corrective action plan and submit it to ODE CNP. A written corrective action plan is comprised of policies and procedures or other official documentation which ensures the serious deficiencies have been fully and permanently corrected. Additionally, the sponsor must also submit any supporting documents and other corrective actions as deemed necessary by the review findings as required by ODE CNP. The corrective action plan, supporting documents and any other required corrective actions must be submitted within the required time frame as outlined in the notice of *Serious Deficiency*. If not previously provided the following information must be submitted as a part of the corrective action plan:

- Name(s) of the institution or provider and other RPIs associated with the serious deficiencies;
- Location of the institution or provider;
- Dates of birth for all RPIs or the provider associated with the serious deficiencies.

Until corrective actions and any other requirements established by ODE CNP during the *seriously deficient* process are fully and permanently implemented the sponsor may not:

- Add sites to its CACFP agreement;
- Sponsor other Child Nutrition Programs such as the Summer Food Service Program (SFSP); or
- Be granted approval of its yearly renewal application.

Serious Deficiency Temporary Deferral

When the written corrective action plan has been evaluated and approved, ODE CNP will temporarily defer the serious deficiency determination. ODE CNP will notify the Institution, the named Responsible Principals and Responsible Individuals, in writing, that ODE CNP has temporarily deferred the serious deficiency determination. The

sponsor may continue its participation in the CACFP. ODE CNP staff will conduct an unannounced follow-up review to determine if corrective actions have been permanently and fully implemented. If the follow-up review demonstrates compliance the serious deficiency will remain temporarily deferred.

While Temporary Deferral allows the Institution, the Responsible Principals and Responsible Individuals to continue to operate the CACFP within their program, a determination of Serious Deficiency is not rescinded. If a sponsor is determined to be seriously deficient after the Temporary Deferral has been approved, ODE CNP may proceed to propose termination and disqualification. The Institution, its Responsible Principals and Responsible Individuals will not have any further opportunity for corrective action.

Section B - Proposed Suspension and Suspension

ODE CNP may propose to suspend the *State Agency Agreement* with the sponsor, rendering the sponsor temporarily ineligible to participate in the CACFP, including program payments.

Suspension would be proposed and applied by ODE CNP pursuant to section 226.6(c)(5)(ii) of the CACFP regulations ([7 CFR 226.6\(c\)\(5\)\(ii\)](#)) *Notice of suspension, serious deficiency, proposed termination, and proposed disqualification*. This section outlines the two *Serious Deficiencies* in which ODE CNP would be required to suspend a Sponsor's participation in the CACFP:

- **Imminent threat to health or safety**– If State or local health or licensing officials have cited a Sponsor for a serious health or safety violation, the State must immediately suspend the Sponsor's CACFP participation. Or, if ODE CNP determines that there is an imminent threat to the health or safety of participants at a sponsor's site, or that the sponsor has engaged in activities that threaten the public health or safety, ODE CNP must immediately notify the appropriate State or Local licensing and health authorities and take action that is consistent with the recommendations and requirements of those authorities. See Chapter 1, [Section C - Health and Safety Requirements](#)
- **False or fraudulent claims** – If ODE CNP determines that an institution has knowingly submitted a false or fraudulent claim; ODE CNP may initiate action to suspend the sponsor's agreement and must initiate action to terminate the sponsor's agreement and initiate action to disqualify the sponsor and the Responsible Principals and Responsible Individuals. ODE CNP is required to disallow the false or fraudulent claim(s).

When suspension is initiated, it is part of the *Serious Deficiency* process and is only temporary. Suspension does not mean termination. However, the State Agency is mandated to initiate proposed termination of the sponsor's agreement, and initiate action to disqualify the Sponsor and Responsible Principals and Responsible Individuals prior to any formal action to revoke the Sponsor's licensure or approval. *There is no corrective action available or opportunity for appeal before suspension is issued.*

ODE CNP is prohibited from paying any claims for reimbursement from a suspended sponsor. However, if the suspended sponsor prevails in the appeal of the proposed termination, ODE CNP must pay any claims for reimbursement for eligible meals served during the suspension period.

Review of Proposed Suspension

Sponsors may request a review of the proposed suspension of their Program participation. If a suspension review is requested, it will not take effect until the suspension review official makes a determination on the request.

A suspension review must be requested in writing no later than 10 days after receiving the ODE CNP letter notifying the sponsor of the proposed suspension. If the sponsor fails to request a suspension review by this date, the sponsor's request will be denied, and the suspension will take effect.

Section C- Proposed Termination and Disqualification

ODE CNP will move to immediately propose to terminate the *State Agency-Sponsor Agreement* to participate in the CACFP and propose disqualification of the Institution, its Responsible Principals and Responsible Individuals without any further opportunity for corrective action in the following situations:

- If the responses to corrective actions from a *Seriously Deficient* sponsor are not approved, submitted, completed and/or implemented by the required due date; or,
- If at a future time ODE CNP identifies the sponsor has not fully and permanently corrected the *serious deficiencies*

ODE CNP will notify the sponsor of its intent to terminate the *Sponsor-State Agency Agreement*. The Notice of Intent to Terminate and Disqualify will specify:

- ODE CNP is proposing to terminate the institution's agreement and to disqualify the Institution and Responsible Principals and Responsible Individuals;

- The basis for the actions;
- That, if the Institution voluntarily terminates its agreement after receiving the notice of proposed termination, the institution and Responsible Principals and Responsible Individuals will be disqualified;
- The procedure for appeal of the proposed termination, and,
- Unless participation has been suspended if the sponsor appeals the Intent to Terminate, the sponsor may continue to participate and receive Program reimbursement for eligible meals served until the appeal is completed.

Reimbursement

ODE CNP will continue to pay any valid, unpaid claims for reimbursement for eligible meals served until the program has not appealed the termination within the appeal timeframe, or if appealed, until the appeal outcome has been issued. If ODE CNP prevails in an appeal, ODE CNP will not continue making Program payments. If the sponsor prevails in an appeal, the sponsor may continue filing reimbursement claims. ODE CNP may request claims documentation prior to payment.

If the sponsor does not submit an appeal, the agreement will be terminated on the date given by ODE CNP in the *Notice of Intent to Terminate*.

Consequences of Termination and Disqualification

Termination and disqualification from participation in the CACFP will result in the Institution, its Responsible Principals (board members, directors, officers, and key employees who should have known about the problems) and Responsible Individuals being prohibited from participation in the CACFP or the Summer Food Service Program in other sponsoring organizations.

The Institution, the Responsible Principals and the Responsible Individuals are placed on the National Disqualified List, which is maintained by USDA, disqualifying all those listed from participation in the program anywhere in the United States for seven years or until removed from the list by USDA.

If an outstanding debt is owed to ODE CNP, the debt must be repaid before a disqualified Institution, Responsible Principal or Responsible Individual can be removed National Disqualified list.

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Chapter 26: The Appeal Process

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As required by the U.S. Department of Agriculture Food Nutrition Service (USDA FNS), the Oregon Department of Education (ODE) Child Nutrition Programs (CNP) has developed appeal procedures to describe how institutions, Responsible Principals, and Responsible Individuals participating in the Child and Adult Care Food Program (CACFP) may appeal when ODE CNP takes an adverse administrative action.

Program regulations provide specific guidance regarding those actions that the Oregon Department of Education Child Nutrition Programs (ODE CNP) may take that are subject to appeal, and those that are not, as well as the procedures that must be following in providing sponsors and Responsible Principals/Individuals (RP/Is) notice of appeal rights ([7 CFR 226.6\(k\)](#)). This chapter outlines the procedure for sponsors that wish to appeal actions taken by ODE CNP for the Child and Adult Care Food Program (CACFP).

Section A – Appeal Procedure

The Oregon Department of Education Child Nutrition Programs [Child and Adult Care Food Program Appeal Procedure](#) is available for sponsor review on the Packet Tab in [CNPweb](#) as well as the [ODE CNP CACFP webpage](#).

The appeal procedure process described does not apply to home providers or unaffiliated sites. ODE CNP has elected to require the sponsoring organizations of home providers and unaffiliated sites to conduct the appeals of their providers and/or sites that appeal actions taken by the sponsor that are subject to appeal as provided for at [7CFR 226.6\(l\)\(1\)](#).

Written Notice

When taking action against a sponsor or applicant, ODE CNP will provide the sponsor or applicant a written notice of action that explains the sponsor or applicants right to appeal and refers to the appeal procedure that is included with the written notice. Written notices may include an Administrative Review Report, or a letter sent via email, or mail, or issued on-site during the administrative review process.

A notice that is sent via email, mail or fax is considered received five days after being sent to the addressee's last known mailing address, email address or fax number.

Child and Adult Care Food Program Appealable Actions

What actions can CACFP sponsors and applicants appeal? [7 CFR 226.6\(k\)\(2\)](#) specifies the actions CACFP sponsors and applicants may appeal.

- Application Denial (7 CFR 226.6(k)(2)(i)) – the denial of a new or renewing institution’s application to participate in the CACFP.
- Application Denial of a Sponsored Site (7 CFR 226.6(k)(2)(ii)) – the denial of an application submitted by a sponsoring organization on behalf of a facility.
- Proposed Termination (7 CFR 226.6(k)(2)(iii)) – Propose to terminate an institution’s CACFP agreement.
- Proposed Disqualification of a Responsible Principal or Responsible Individual (7 CFR 226.6(k)(2)(iv)) – Proposal to disqualify a responsible individual in a new, renewing or participating CACFP institution.
- Suspension (7 CFR 226.6(k)(2)(v)) – Suspension of an institution’s participation in the CACFP.
- Denial of Start-up and Expansion Funds (7 CFR 226.6(k)(2)(vi)) – denial of an sponsor’s application for start- up and expansion payments.
- Denial of Advance Payments (7 CFR 226.6(k)(2)(vii)) – denial of a sponsor’s request for advance payment
- Recovery of Advance Payment - demand for recovery of advance payment
- Claim Denial (7 CFR 226.6(k)(2)(ix) – denial of all or part of a sponsors claim for reimbursement (not on the basis of a late claim submission).
- Claim Deadline Exceptions and Requests for Upward Claim Adjustments (7 CFR 226.6(k)(2)(x)– ODE CNP’s decision to not forward the USDA FNS an institutions exception request for payment of a late claim, or a request for an upward adjustment of a claim.
- Overpayment Demand (7 CFR 226.6(k)(2)(xi) – Demand for remittance of an overpayment
- Any other action of ODE CNP affecting a sponsor’s participation or its claim for reimbursement.

What cannot be appealed?

ODE CNP is prohibited from offering appeals for any of the following actions.

- A decision by FNS to deny an exception request by an institution for payment of a late claim, or for an upward adjustment to a claim is not subject to appeal.
- A determination that an institution is seriously deficient.
- Disqualification and placement on the State Agency list and National Disqualified List (NDL).
- Termination of a participating institution’s agreement, including termination of a participating institution’s agreement based on the disqualification of the institution by another State agency or FNS.

- A determination, either by the State Agency or FNS, that the corrective action taken by an institution or a RP/I is not adequate to warrant the removal of the institution or the RP/I from the NDL is not subject to appeal.

Written Request for an Appeal

A request for appeal must be in writing and may be submitted for responsible principals and responsible individuals. ODE CNP must receive the request for appeal no later than 15 calendar days from the date the appellant received the notice of State agency action. ODE will acknowledge receipt of the request for appeal within 10 calendar days of receipt of the request.

The Appellant may refute the findings in the notice of action either in person or by submitting written documentation to the review official. The review official will not consider written documentation received more than 30 days after the date the Appellant received the notice of action. Submitted documentation must clearly identify the appeal action.

An in-person hearing must be held in addition to, or in lieu of, a review of the written documentation *only* if the written request for an appeal specifically requests an in-person hearing. Appellants may be represented by legal counsel or another person. Failure to appear at a scheduled hearing constitutes a waiver of the right to a personal appearance before the review official unless the review official agrees to reschedule the hearing. A State agency representative must be allowed to attend the hearing to respond to the Appellant's written documentation and testimony and to answer questions from the review official. Written notice must be provided at least 10 days in advance of the time and place of the hearing. If an in-person hearing is requested, the hearing must be held within 45 days of the date of the receipt of the request for appeal, but not before Appellant's written documentation is received.

ODE CNP limits the administrative review to a review of written submissions concerning the accuracy of the State agency's determination if the application was denied or the State agency proposes termination to the institution's agreement because:

- The information submitted on the application was false,
- The institution, one of its sponsored facilities, or one of the principals of the institution or its facilities is on the national disqualified list,
- The institution, one of its sponsored facilities, or one of the principals of the institution or its facilities is ineligible to participate in any other publicly funded program by reason of violation of the requirements of the program, or

- The institution, one of its sponsored facilities, or one of the principals of the institution or its facilities has been convicted for any activity that indicates a lack of business integrity.

Submitting Written Documentation

Written documentation for all types of hearings must be submitted within 30 calendar days from the date the operator received notice. The written documentation must be sent to the review official. The review official will not consider written documentation received more than 30 days after the date the Appellant received the notice of action. The submitted documentation must clearly identify the appealed action.

Information upon which the State agency based its action will be made available to the Appellant for inspection.

Review Official

The review official must be independent and impartial. The review official may be an employee of the State agency, but they must be independent of the original decision-making process.

The Appellant may contact the review official directly if they so desire.

The review official's determination will be consistent with Federal and State laws, regulations, policies, and procedures governing the Program, based solely on the information provided by the State agency and the Appellant.

Notification of Determination

After the review of written documentation, and/or the in-person hearing the review official will make an official determination if the action is to be upheld or overturned.

The review official determination will be consistent with Federal and State laws, regulations, policies, and procedures governing the Program, based solely on the information provided by the State agency and the Appellant.

The review official must make a determination and inform the State agency and Appellant of that determination within 60 days of the State agency's receipt of the Appellant's written request for an appeal.

The review official's determination is the final determination granted to the Appellant.

Program Operations During an Appeal

The State agency's action will remain in effect during the appeal process. However, participating sponsors and sites may continue to operate the Program during an appeal of a termination of an agreement. If the appeal results in overturning the State agency's action, reimbursement must be paid for qualified meals served during the appeal process.

Program operation must cease if the State agency's action is based on imminent dangers to the health or welfare of children. If this is the reason for the State agency action, it will be specified in the notice of action, per [7 CFR 226.6\(c\)\(5\)\(i\)\(B\)](#).

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Appendix A: Terms and Acronyms

Definitions of Terms:

2 CFR: Title 2, Code of Federal Regulations—this is the part and/or section of federal regulations that governs the administrative requirements, cost principles, audit requirements, procurement of goods and services, related to the allowable use of federal funds for the Child and Adult Care Food Program.

7 CFR: Title 7, Code of Federal Regulations—this is the part and/or section of federal regulations that includes regulations for the Child and Adult Care Food Program.

Activities of Daily Living: Include, but are not limited to, adaptive activities such as cleaning, shopping, cooking, taking public transportation, maintaining a residence, caring appropriately for one's grooming or hygiene, using telephones and directories, or using a post office.

Adult Day Care Center: A licensed care center approved to provide nonresidential adult day care services to adults that are 60 years or older and/or functionally impaired.

Administrative Costs: The costs incurred by an institution related to planning, organizing, and managing a food service under the CACFP.

Adult Participant: A person enrolled in an adult day care center who is functionally impaired or 60 years of age or older.

At-Risk Afterschool Center: A licensed or license-exempt center that administers the At-risk Afterschool Meals Component of the Child and Adult Care Food Program.

Authorized Representative: An owner or employee of the sponsor organization that has oversight of how CACFP is run at all sites. They must have signatory authority, meaning that they can sign agreements on behalf of the organization and enter into contract with ODE and any other vendor relationships the organization may have. Depending on the organization's structure and size, the day-to-day involvement in CACFP duties may be minimal to intense. No matter the level of involvement day-to-day, the authorized representative is ultimately responsible for how CACFP is operated.

Center: A child care center, outside school hours child care center, at-risk afterschool center, adult day care center, or emergency shelter.

Children: means:

1. Persons aged 12 and under;
2. Persons aged 15 and under who are children of migrant workers;
3. Persons with disabilities as defined in Title 7, CFR 226.2;
4. For emergency shelters, persons aged 18 and under; and
5. For At-Risk Afterschool care centers, persons aged 18 and under at the start of the school year.

Claim Contact: An owner or employee of the sponsor's organization responsible for submitting claims in CNPweb each month. They may have additional CACFP duties, but that will vary by the organization's size and structure. Since the claim contact is responsible for submitting monthly claims, they must have CNPweb access with at least Claims access. In many organizations, the claim contact is often the Food Program Coordinator or Financial Office Contact.

CNPweb: the online database used by Oregon Department of Education Child Nutrition Programs to receive and maintain agency applications and to process claims for reimbursement.

CN Label: Child Nutrition Label - a product label includes a standardized food crediting statement from food manufacturers. CN Label must be authorized by the U.S. Department of Agriculture, Food and Nutrition Service (FNS), prior to use, and manufacturers must have quality control procedures and inspection oversight that meet the FNS requirements. Products produced in accordance with the CN Labeling Program are generally purchased by foodservice providers for FNS meal programs.

Combination Foods: Food items that contain two or more meal pattern components in a serving or a food item that contains creditable and non-creditable ingredients.

Creditable Foods: Foods that may be counted toward meeting the requirements for a reimbursable meal/snack in the Child and Adult Care Food Program.

Days: When the State agency describes days to respond or communicate by, it is calendar days, unless specifically noted business days.

Deep-Fat Frying: A cooking method involves submerging a food in extremely hot oil until it reaches a safe minimum internal temperature. Child and Adult Care Food Program prohibits deep-fat frying as way of preparing food onsite but allows centers and day care homes to serve pre-fried purchased foods. As a best practice, U.S. Department of Agriculture Food and Nutrition Service strongly recommends limiting the service of pre-fried foods that are purchased from a store, caterer, or vendor because they can contribute large amounts of saturated fat and calories to a meal.

Disallow Meals: To remove from the meal count. For example, if review of the working menu showed one child received a special meal that was not reimbursable, the count for that meal would be removed from the meal count before submitting the claim for reimbursement.

Disqualified: The status of an institution, a responsible principal or responsible individual, or a day care home that is ineligible for participation.

Drop In Participants: Participants who do not have a regular schedule at the center. These participants must be included in the OMER, regardless of number of days in care during the OMER month.

Emergency Shelter: Public or private nonprofit organization or its site that provides temporary shelter and food services to homeless children, including a residential child care institution (RCCI) that serves a distinct group of homeless children who are not enrolled in the RCCI's regular program.

Enrolled participant: Means a participant whose parent or guardian has submitted to an institution a signed document which indicates that the participant is enrolled for care at the center.

Family: in the case of children, a group of related or nonrelated individuals, who are not residents of an institution or boarding house, but who are living as one economic unit or, in the case of adult participants, the adult participant, and if residing with the adult participant, the spouse and dependent(s) of the adult participant.

Financial Office Contact: An owner or employee of a sponsor's organization that provides financial oversight of CACFP reimbursements and manages the non-profit food service account. We recommend that the financial office contact have CNPweb access since they will need to review the budget, and should be checking the claims and payments tabs on CNPweb regularly. The financial office contact may be involved with general financial oversight in your organization, and they are usually involved with the development of any financial procedures related to CACFP, such as handling receipts, tracking on staff hours worked, and approval of mileage reimbursements.

Fiscal Year: A year per accounting purposes. CACFP operates on a fiscal year from October to the following September.

Food Item: A specific food within the food component. For example, an orange is a food item in the fruits component and bread is a food item in the grains component.

Food Program Coordinator: An owner or employee of a sponsor's organization that acts as the main point of contact to ODE CNP and should be the person who coordinates most day-to-day CACFP operations. The CACFP duties may also vary based on the size of the organization and the organization's structure. However, as the main ODE CNP contact, this person must have access to CNPweb since they will be expected to update applications as needed, work with ODE CNP during renewal time, and also be the main contact for any administrative reviews.

Food Service Management Company: Means an organization other than a public or private nonprofit school, with which an institution may contract for preparing and, unless otherwise provided for, delivering meals, with or without milk for use in the Program.

For-Profit Center: A child care center, Outside-School-Hours Care Center, or adult day care center providing non-residential care that does not qualify for tax-exempt status under the Internal Revenue Code of 1986.

Foster Child: A child who is formally placed by a court or a State child welfare agency.

Functionally Impaired Adult: Means a chronically impaired disabled person 18 years of age or older, including victims of Alzheimer's disease and related disorders with neurological and organic brain dysfunction, who is physically or mentally impaired to the extent that his/her capacity for independence and ability to carry out activities of daily living is markedly limited

Grain-Based Desserts: Grain-based desserts are food items that are denoted with a superscript 3 or 4 in the U.S. Department of Agriculture Exhibit A Grain Requirement for Child Nutrition Programs Chart. The following foods are considered grain-based desserts: cookies, sweet crackers (e.g., graham and animal crackers), sweet pie crusts, doughnuts, cereal bars, breakfast bars, granola bars, sweet rolls, toaster pastries, cake, and brownies.

Group home: means residential communities which may or may not be subsidized by Federal, state or local funds but which are private residences housing an individual or a group of individuals who are primarily responsible for their own care and who maintain a presence in the community but who may receive on-site monitoring.

Household: See definition of **Family**.

Independent center: A sponsor with a single site who enters into an agreement directly with the State agency and assumes final administrative and financial responsibility for Program operations.

Individualized Plan of Care: must provide a variety of health, social, and supportive services for enrolled participants who are functionally impaired.

Infant – A participant that is younger than 12 months old. Centers that have infants in care during the report month must include them in the OMER, even if the parent/guardian has declined the center provided food and formula.

Internal controls: Policies, procedures, and organizational structure of an institution designed to reasonable assure that the Program achieves its intended result, Program resources are used in a manner that protects against fraud, abuse, and mismanagement, and in accordance with law, regulations, and guidance, and timely and reliable Program information is obtained, maintained, reported, and used for decision-making.

Marked Limitations refer to the severity of impairment, and not the number of limited activities, and occur when the degree of limitation is such as to seriously interfere with the ability to function independently.

Meal Component: A food category that makes up a reimbursable meal. Meal components in CACFP include: grains, vegetables, fruits, meat/meat alternates, and milk.

Meal Pattern: Is the set of requirements related to the nutritional quality of foods served to infants, children, and adults that must be followed in order to claim meals or snacks for reimbursement.

Multi-Site Sponsor: A sponsor operating two or more sites under the CACFP.

Non-Pricing Program: an institution, child care facility, or adult day care facility in which there is no separate identifiable charge made for meals served to participants.

Non-Profit Food Service (NPFS): A requirement of CACFP meaning all food service operations conducted by the institution are principally for the benefit of enrolled participants, from which all of the Program reimbursement funds are used solely for the operations or improvement of such food service.

Nonresidential: the same participants are not maintained in care for more than 24 hours on a regular basis.

Notice: A letter sent by certified mail, return receipt, (or the equivalent private delivery service), by facsimile, or by email, or delivered in person, that describes an action proposed or taken by the State Agency or FNS with regard to an institution's Program reimbursement or participation.

Operating Costs: Expenses incurred by an institution in serving meals to participants under the CACFP and allowed by the CDSS financial management instructions.

Outside-School-Hours Care Center: Also known as school-age center; a licensed or license-exempt center that provides organized nonresidential child care services to children during hours outside of school.

Pricing Program: An institution, child care facility, or adult day care facility in which a separate identifiable charge is made for meals served to participants.

Product Formulation Statement: Also called PFS, a signed certified document that provides a way for a manufacturer to demonstrate how a product may contribute to the meal pattern requirements of the U.S. Department of Agriculture's child nutrition programs.

Reimbursement: Federal financial assistance paid or payable to institutions for Program costs within the rates assigned by the State agency.

Responsible Principals/Individuals: ultimately responsible for CACFP management and oversight. If regulatory requirements are not met, these staff will be the ones ultimately responsible for making corrective actions to stay on the program. Responsible Principals include Authorized Representative, Food Program Coordinator, Financial Office Contact, Claim Contact, and the Board Chair. These contacts must remain up to date and current with who is listed in CNPweb, as this is the information that ODE CNP uses to communicate program information.

School Food Authority: also called SFA, the governing body that is responsible for the administration of one or more schools and has the legal authority to operate the National School Lunch Program **or** be otherwise approved to operate the National School Lunch Program, may also be a public center.

Site: a care center where meals are served and is under the administration of an approved CACFP sponsor organization.

Sponsor: An organization receiving Child and Adult Care Food Program reimbursement that is entirely responsible for the administration of the program. Also known as a sponsoring organization.

Standardized Recipe: a standardized recipe is one that has been tried, adapted, and retried at least three times and has been found to produce the same good results and yield every time when the exact procedures are used with the same type of equipment and the same quantity and quality of ingredients. A standardized recipe in the CACFP shows that the menu item meets the meal pattern requirements.

State Agency: The agency designated by the Governor to administer the CACFP within the state. In Oregon, this is the Oregon Department of Education (ODE).

Whole Grain-Rich: foods that contain 100 percent whole grain or at least 50 percent whole grain meal and/or flour. Any remaining grain ingredients must be enriched, bran, or germ.

Acronyms:

CACFP: Child and Adult Care Food Program

CCC: Child Care Center

CCLD: Child Care Licensing Division

CEF: Child Enrollment Form

CIS: Confidential Income Statement

CN Label: Child Nutrition Label

CNP: Child Nutrition Programs

DELCD: Department of Early Learning and Care

ERDC: Employment Related Daycare Costs

FPC: Food Program Coordinator

FNS: Food and Nutrition Service

FSMC: Food Service Management Company

HS: Head Start

NPFS: Non-Profit Food Service

NSLP: National School Lunch Program

ODE CNP: Oregon Department of Education Child Nutrition Programs

OMER: One Month Enrollment Roster

OSHCC: Outside School Hours Care Centers

PFS: Product Formulation Statement

POS: Point-of-Service

SBP: School Breakfast Program

SFA: School Food Authority

SFSP: Summer Food Service Program

SNAP: Supplemental Nutrition Assistance Program

SSO: Seamless Summer Option

UEI: Unique Entity Identifier

USDA: United State Department of Agriculture

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Appendix B: Frequently Asked Questions

Chapter 3: Participant Enrollment and Eligibility

Can CIS and CEF forms be completed electronically?

Yes, these forms may be completed electronically by the parent/guardian. ODE CNP recommends having a process in place for providing and receiving the forms, as well as making the hard copy forms available for parents/guardians who may not have access to a computer.

Do parent/guardians need to provide documentation to support the information listed on their submitted CIS form?

No. Additional documentation is not required to be submitted by the parent/guardian. When the parent/guardian signs the CIS form, they certify that all information listed on the form is true and correct.

Chapter 4: One Month Enrollment Roster (OMER)

Do I need to submit my OMER to my child nutrition specialist?

No, the OMER does not need to be sent to ODE. It must be saved in the sponsor's files and made available upon request or during an Administrative Review.

Do I need to update my OMER if I have new participants mid-year?

No, it is not a requirement that the OMER be updated mid-year, even if you've added or removed participants. For most sponsors, October's enrollment is representative of enrollment patterns for the rest of the year. If there are significant changes that affect the reimbursement, a revision may be requested.

Even though the OMER isn't required to be updated, Sponsors do need a tracking system in place to ensure that CEFs are collected for all participants enrolled throughout the year. Meals cannot be claimed for reimbursement for participants without a valid CEF.

I've had a large change in enrolled participants in the middle of the year, can I change my OMER numbers?

A sponsor may reach out to their assigned Child Nutrition Specialist requesting an OMER revision. If granted, the sponsor must create a new OMER based on the new OMER month requested then submit the new OMER and supporting Child Enrollment forms and Eligibility documentation to ODE CNP. ODE CNP will then review and approve the submitted documentation and will use the updated data from the new OMER to calculate the percentages for reimbursement for that month forward.

Chapter 9: Meal Pattern

The grain item I bought has "Includes Whole Grains" on the packaging, but my specialist tells me it is not a whole grain-rich item. Why is that?

Products in the marketplace may include some whole grain ingredients but does not meet the whole grain-rich definition of having at least 50% of the grain ingredients be whole grains. The only way to verify that a product is truly whole grain-rich is by using one of the six methods to determine WGR items.

Is popcorn a whole grain-rich food?

Yes, it is. However, it takes 3 cups of popped popcorn to meet 1 oz. eq. of whole grains. This may not be a reasonable volume of food for most participants to consume. Please note that sweetened and candied popcorn is considered a grain-based dessert and will not be creditable

Are veggie straws, potato chips, or cauliflower chips creditable for the vegetable component?

No. These items are considered snack foods and are not allowed because they do not contain sufficient nutrients per serving and contain high amounts of fat and sodium. Many veggie sticks and straws also do not contain sufficient amount of vegetables per serving.

Can combination mixed vegetables like carrots and peas be used as two different vegetable components (substituting for one fruit component) for lunch or supper?

Yes. However, a recipe or a product formulation statement must be available to show how the ingredients credit for each component.

Chapter 17: Emergency Shelters

Are refugee children and qualifying adults with disabilities residing in the emergency shelter eligible for CACFP meals?

Yes, citizenship is not an eligibility consideration for children and persons with disabilities of any age who would participate in CACFP.

Can meals served to persons with disabilities above age 18 be claimed for reimbursement?

Yes, meals served to persons with disabilities above age 18 can be claimed, but the majority of meals served and claimed must be provided to children.

Can emergency shelters claim CACFP reimbursement for meals that are supported with funds from other Federal programs?

Yes, the shelter can use other available funds, however the shelter cannot claim the same meal under two different programs. For example, the shelter could use its FEMA funds to serve meals to adults or to nonresidential children whose meals would not be eligible for CACFP reimbursement.

Can a shelter that provides congregate meals to homeless families participate even if the clients receive vouchers from the shelter to stay at motels?

Yes, a shelter may be eligible for CACFP even if it offers housing in a different location from where it provides meal services. Again, there must be assurances that the shelter is a legitimate provider of services to homeless children, and that it is able to document that the children who receive meals and snacks are residents of emergency shelters.

When a battered women's shelter applies to participate in CACFP, must it comply with CACFP media release requirements?

No, due to the secrecy needed to ensure the safety of residents, a media release is not required for a battered women's shelter. Providing safe, emergency shelter to battered women and their children is the first step in meeting the needs of women fleeing domestic violence. If the location of the shelter is kept secret to ensure the safety of its residents, it is not necessary to apply this requirement.

Some shelters may be authorized to accept food stamps (Supplemental Nutrition Assistance Program – SNAP benefits) from some of their meal clients. Can a shelter that accepts food stamps as payment for meals accept food stamps and claim reimbursement for the meals served to eligible children through CACFP?

Yes, if an emergency shelter provides services in exchange for a specific portion of a family's food stamps, and there is no separate charge for individual meals, the shelter can participate in CACFP and claim reimbursement for serving meals and snacks to eligible children. However, the shelter cannot collect food stamps as payment for specific meals, and still claim those meals under CACFP. That would be equivalent to making a family pay cash for its child's meals when the meals must always be served free.

Chapter 21: Adult Day Care Centers

If a participant receives Social Security disability benefits, does this qualify her/him categorically Free-eligible for purposes of developing the One Month Enrollment Roster (OMER)?

No. Social Security disability benefits are not based on financial need like SSI benefits.

If a participant is receiving both Supplemental Security Income (SSI) and Social Security disability benefits, is s/he categorically Free-eligible for purposes of developing the OMER?

Yes. Participants receiving SSI are categorically Free-eligible regardless of any other benefits they are receiving.

If a potential participant is functionally impaired and cannot sign the *Confidential Income Statement (CIS)* for him/herself and a guardian is not available to sign the CIS, may a case manager at the Center sign the *CIS* form for the adult participant?

Yes, if the participant is categorically Free-eligible and the participant's file contains documentation of her/his categorical eligibility. This provision is to be used on a case-by-case basis. Sponsors may not use this method of approval for all participants. If the participant is not categorically Free-eligible, the CIS must be signed by the participant, the participant's guardian, or an adult household member.

Who must provide the last four digits of their Social Security Number (SSN) on an income-based *CIS*?

Applicants are required to submit the last four digits of the SSN of the primary wage earner responsible for the care of the participant. This could be the participant, or the participant's parent or guardian living in the participant's household and should be the SSN of the person signing the form.

Appendix C: Tools and Resources

- [ODE CNP Webpage](#)
- [ODE CNP CACFP Webpage](#)
 - [ODE CNP CACFP Memos Page](#)
 - [ODE CNP CACFP Reimbursement Rates Page](#)
 - [ODE CNP Meal Pattern and Menu Planning Page](#)
 - [ODE CNP CACFP Training Page](#)
- [ODE CNP Civil Rights Page](#)
- [ODE CNP Meal Accommodations Page](#)
- [7 CFR 226](#)
- [FNS 796-2 Rev 4](#)
- [USDA Food Buying Guide](#)
- [USDA Crediting Handbook for CACFP](#)
- [USDA At-Risk Afterschool Meals Handbook](#)
- [USDA Adult Day Care Center Handbook](#)
- [USDA Serious Deficiency, Suspension & Appeals for State Agencies and Sponsoring Organizations Handbook](#)