



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

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**MEMO CODE:** CACFP 11-2007

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**SUBJECT:** Accommodations for Non-Traditional Program Operators

**TO:** Regional Directors  
Child Nutrition Programs  
All Regions

State Agency Directors Administering CACFP  
All States

Reducing paperwork in the Child and Adult Care Food Program (CACFP) is a priority for Food and Nutrition Service (FNS). In response to the Child Nutrition and WIC Reauthorization Act of 2004 directive to examine the feasibility of reducing Program paperwork and recordkeeping requirements, FNS convened a paperwork reduction work group of CACFP stakeholders. While the work group sought to identify opportunities to reduce paperwork for all CACFP institutions and facilities, providing relief to “non-traditional” facilities, especially emergency shelters, was a priority recommendation.

FNS agrees that non-traditional child care facilities such as emergency shelters, at-risk afterschool centers and outside-school-hours-care centers (OSHCC) are unique facilities for which certain accommodations are appropriate to facilitate their participation in CACFP. Some accommodations have already been made in law, regulation or policy. Areas of ongoing concern include State imposed requirements related to management plans, production records, documentation of food service provided for infants, and CACFP cost documentation. The following is a summary of the accommodations typically made for these three types of non-traditional centers. States are encouraged to take the least restrictive approach possible in applying the regulations to the day to day operations of these non-traditional centers.

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### Application

Emergency shelters, at-risk afterschool and OSHCC programs wishing to participate in CACFP must comply with the application procedures established by regulation and State policy. However, management plans are not required as part of the application

unless the institution intends to sponsor more than one facility. As with all institutions, States are encouraged to establish permanent agreements and three-year renewal cycles with non-traditional centers to reduce paperwork burden.

In addition, non-traditional centers should be afforded latitude with regard to budgets. FNS has previously noted that, although a budget is a necessary element of determining the viability of a Program applicant, the level of budgetary detail requested should be commensurate with the size and scope of the applicant. In the case of non-traditional centers, States are encouraged to obtain the minimum amount of information to enable them to assess the viability of the applicant.

#### Facility Eligibility

There is no Federal requirement that emergency shelters, at-risk or OSHCCs have licensing or approval to provide child care unless specifically required by State or local licensing authorities. Licensing or approval is not required for non-traditional centers but they must, at a minimum, meet State or local health and safety standards.

#### Child Enrollment/Eligibility

Emergency shelters, at-risk and OSHCCs are not required to collect enrollment information for participating children. At-risk and OSHCCs may use sign-in sheets as the daily roster.

Emergency shelters must ensure that only meals served to eligible resident children are claimed; meals served to adults and non-resident children are not reimbursable. Emergency shelters must maintain, at minimum, a list of children by name, date of birth and dates of residency in the shelter.

Emergency shelters and at-risk programs are not subject to multiple reimbursement rates because all eligible meals served to eligible children are paid at the free rate. OSHCCs are subject to multiple reimbursement rates and, therefore, must collect income eligibility information from participating children.

#### Meal Service

All three types of non-traditional facilities must keep a daily roster of children receiving meals, as well as a menu and meal count for each meal service. If an emergency shelter has an afterschool program that is separate from the residential shelter, and is approved to claim at-risk afterschool snacks or suppers, those snacks and meals served to non-residential children may be claimed.

Feeding Infants

Non-traditional facilities serving infants must offer meals to infants and must offer an infant formula that meets program requirements. If a parent declines the formula offered by the facility, the parent can provide a different brand of formula. States should define how non-traditional facilities are to document a parent's decision to decline the offered formula in a manner that minimizes the recordkeeping burden. The widely used "formula choice forms", although not a Federal requirement, serve a valuable function in helping to ensure that parents are fully informed. However, given the nature of non-traditional centers, especially emergency shelters, a simpler form of documentation may be appropriate. For example, a notation on a meal roster or the list of participating children may be sufficient.

Documentation of CACFP and Food Service Related Costs

All CACFP institutions are required to document that all program reimbursement funds are used solely for the operations or improvement of the non-profit food service for enrolled participants. Due to the nature of their operations, emergency shelters may have particular difficulty demonstrating a non-profit food service. Some State agencies require and review production records as a means to validate an emergency shelter's non-profit food service. Federal policy does not require emergency shelters to keep production records or the estimated value of donated foods. Furthermore, CACFP policy stipulates that a simple record of food service revenues and expenditures is sufficient to document a non-profit food service. Therefore, if an emergency shelter satisfactorily demonstrates a non-profit food service at the point of application/renewal, a State agency shall not require additional documentation except as necessary for corrective action.

If there are any additional questions concerning these topics, Regional offices should contact Keith Churchill. State agencies should contact their Regional office.

**Original Signed**

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