



Georgia Department of Early Care and Learning

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Nathan Deal
Governor

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Commissioner

MEMORANDUM

To: All Institutions and Sponsors Participating in the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP)

From: Falita S. Flowers, Nutrition Services Director (*Original Signed*)

Date: January 31, 2017

Subject: Clarifying Wage Guidelines for Institutions and Sponsors Charging Salaries to the CACFP and/or SFSP

Legal Authority: 2 CFR § 200, FNS Instruction 796-2 Rev. 4, FNS Instruction 796-4 Rev. 4

Definitions: *Institution* means a sponsoring organization, child care center, at-risk afterschool care center, outside-school-hours care center, emergency shelter or adult day care center which enters into an agreement with the State agency to assume final administrative and financial responsibility for Program operations.

Sponsor means a public or private nonprofit school food authority, a public or private nonprofit residential summer camp, a unit of local, municipal, county or State government, a public or private nonprofit college or university currently participating in the NYSP, or a private nonprofit organization which develops a special summer or other school vacation program providing food service similar to that made available to children during the school year under the National School Lunch and School Breakfast Programs and which is approved to participate in the Program.

Program means the Child and Adult Care Food Program and/or the Summer Food Service Program.

The purpose of this memorandum is to clarify wage guidelines for CACFP institutions and SFSP sponsors who charge salaries to the Program.

On occasion, the Nutrition Services Division encounters questions from institutions and sponsors on the allowability of charging salaries to the CACFP or SFSP for their executive staff level positions such as Chief Executive Officer, Chief Operating Officer, Superintendent, and Executive Director (Note:

Organizations who only administer and manage funds from the CACFP and SFSP may not utilize the Chief Executive Officer/Chief Operating Officer (COO) - Superintendent Functional Area).

In accordance with 2 CFR § 200.430, FNS Instruction 796-2 Rev. 4, and FNS Instruction 796-4 Rev. 4, total compensation must be reasonable, meaning the compensation paid to an institution's or sponsor's employees, must be consistent with compensation paid for similar work in the labor market. Specifically, salaries for operating and administering the Program(s) must be consistent with rates paid for similar work and consistent with the amounts reported by the U.S. Department of Labor or the State Labor Department for that same field of employment, in the same or comparable geographic location.

To ensure CACFP/SFSP funds used for salaries are necessary and reasonable, DECAL utilizes the U.S. Bureau of Labor Statistics Standard Occupational Codes (SOC) to calculate related salary/wage ranges for Program functional areas, such as Program Administration, Provider Training/Monitoring, and Administrative Support. The attachment (Appendix C from DECAL's [Budget Guidance Manual](#)) illustrates the FY 2017 Wage Guidelines for the current year which were derived from the most recent Occupational Employment Statistics Survey data. Institutions and sponsors are required to ensure the wages for positions in the program functional areas do not exceed the Federal wage guidelines. As always, institutions and sponsors should consider using non-Program funds to cover any costs that do not meet Federal and State requirements.

Institutions and sponsors whose salaries were once within range of past Federal wage guidelines, may now find those same salaries exceed the current guidelines. DECAL does not permit salaries that do not meet the current wage guidelines to be grandfathered in with current requirements. Institutions/sponsors who fall into this category must reduce their salary amounts so that all salaries in the program functional areas: (a) meet the Federal definition of necessary and reasonable; (b) are not utilized for the sole purpose of maximizing the wage limits; and (c) do not exceed the wage guidelines for the current year.

For institutions and sponsors administering multiple sponsorship types (DCH, Affiliated/Unaffiliated Sponsor, Independent Center, At-Risk After School Program) and Programs (CACFP/SFSP), the Wage Guidelines cannot be applied separately to each sponsorship type and Program. For example, if the same monitor is utilized to monitor Daycare Homes and Daycare Centers, that individual should only have one salary or wage that is allocated, based on the benefit received by each sponsorship type. DECAL will approve only one salary for that monitor. The payroll records of the organization must properly support the allocation and use of Program funds for that staff person.

CACFP institutions and SFSP sponsors are reminded that a written compensation policy must be established and maintained for every element of compensation charged to the CACFP and/or the SFSP, depending upon which Program(s) the organization is operating. Additionally, institutions and sponsors must possess a system of internal controls to monitor significant changes to the plan, as well as to ensure integrity in the institution's/sponsor's overall compensation practices. For more information on written compensation policy requirements refer to DECAL policy memorandum, *Guidance for Establishing a Written Compensation Plan*, May 20, 2016, <http://www.dec.al.ga.gov/documents/attachments/CompensationPlanGuidance.pdf>.

For questions concerning this memorandum, please contact Sonja Adams, Policy Administrator at (404) 651-8193.

FY 2017 WAGE GUIDELINES

CACFP Tasks	1***	2	3	3	5
	Chief Executive/ COO/ Superintendent	Program Administration/Ex ecutive Director	Trainer/Nut rition Education	Monitor	Administrative Support
Corporate Oversight	X	X			
Corporate Fiscal Oversight	X				
Responsible for Reporting to Governing Body	X				
Plans/Directs Funding/Grant Acquisition	X				
Complete Application		X			
Complete Management Plan		X			
Complete Budget		X			
Determine IES					X
Training (Provide or Attend)		X			
Accounts Payable		X			
Process Payroll		X			
Review and correct supporting claim documentation					X
Prepare claim for reimbursement					X
Computer/data entry					X
Plan Menus					X
Record/calculate point of service meal counts					X
General CACFP Administration & Financial Oversight	X	X	X		
Clerical					X
Monitoring				X	
On-site reviews				X	
Travel to/from facilities			X	X	
Supervisory oversight of monitors		X	X		
Writing review reports			X	X	
Follow-up reviews			X	X	
Parental contact			X	X	
Training facilities			X		
Claims processing					X

Standard Occupational Code (SOC)

***11-1011

11-9151

*61-745

*19-614

43-6014

SOC Title

Chief Executive

*Social and
Community Service
Manager*

*Technical Assistance
Coordinator/Trainer*

*Compliance
Monitor*

*Secretaries, Except
Legal, Medical, and
Executive*

Occupational Employment Statistics (OES)

Maximum - Annually

\$213,302

\$77,740

\$67,329.12

\$59,853.29

\$39,134.50

Maximum - Hourly

\$102.55

\$37.38

\$32.37

\$28.65

\$18.81

OES State Occupational Employment and Wages May 2015

**Georgia Department of Human Resources 2014*

\$89.17

\$32.50

\$28.15

\$24.91

\$16.36

***Function code is available only to institutions/sponsoring organizations with multiple funding sources, or multiple activities unrelated to the CACFP and/or SFSP.

Note: Annual salaries are based on 2,080 hours per year. For part-time staff, the hourly rate represents the maximum.