



Georgia Department of Early Care and Learning

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## MEMORANDUM

To: All Summer Food Service Program (SFSP) Sponsors

From: Sonja R. Adams, Director of Provider Services – Nutrition  
*(Original Signed)*

Date: August 20, 2014 (March 28, 2019, v.2)

Subject: Transitioning from the Summer Food Service Program to Child and Adult Care Food Program (CACFP) At-risk Afterschool Meals

Legal Authority: USDA Policy Memoranda SFSP 01-2019 and SP 06-2014, CACFP 03-2014, SFSP 06-2014

Parts of this policy memorandum have been rescinded pursuant to USDA Policy Memorandum, SFSP 01-2019. Rescinded policy has been struck through.
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Definitions: "At-risk afterschool" care center means a public or private nonprofit organization that is participating or is eligible to participate in the CACFP as an institution or as a sponsored facility and that provides nonresidential child care to children after school through an approved afterschool care program located in an eligible area. However, an Emergency shelter, as defined in this section, may participate as an at-risk afterschool care center without regard to location (7 C.F.R. §226.2).

"Eligible area" means the attendance area of an elementary, middle, or high school in which at least 50 percent of the enrolled children are certified eligible for free or reduced price school meals (7 C.F.R. §226.2).

"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 (7 C.F.R. §226.2).

"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. Sponsors are referred to in the Act as "service institutions" (7 C.F.R. § 225.2).

The purpose of this memo is to notify Summer Food Service Program (SFSP) sponsors of flexibilities available to transition into the At-risk Afterschool Meals component of the Child and Adult Care Food Program (CACFP) during the school year. Many existing SFSP sites are well-positioned to offer afterschool meals during the school year through CACFP. Both organizations and communities benefit when meals are offered to children in low-income communities year-round. Organizations benefit from 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. The following is a description of flexibilities of which SFSP sponsors are entitled. Although these flexibilities exist, Bright from the Start is currently making changes to its internal processes in order to be compatible with USDA's requirements.

### **Applications**

In an effort to streamline participation in CACFP, the Food and Nutrition Service (FNS) has waived some application requirements for SFSP sponsors in good standing that wish to apply to participate in CACFP for the first time. Sponsors considered in good standing are those that are not currently seriously deficient in their operation of the SFSP.

- A separate application for SFSP Sponsors transitioning to CACFP is required upon initial entry to the CACFP; general updates/annual renewal will be required thereafter.
- Each new CACFP institution is required to meet the performance standards outlined in 7 CFR §226.6(b)(1) and CACFP Policy No. 04-30. Since SFSP sponsors are already familiar with operating a Child Nutrition Program, they are not required to provide documentation that they have practices in place to ensure the meal service, recordkeeping, and other Program requirements are performed properly. Successful operation of SFSP provides evidence of this performance standard.
- Each new CACFP institution is required to complete a management plan and program budget as part of the CACFP application process. However, School Food Authorities (SFAs) are waived from this requirement. Management plans and budget requirements are not required unless the SFSP sponsor intends to sponsor more than one facility (see also Bright from the Start's Policy Memorandum, *Streamlined Application Processes in the CACFP for School Food Authorities (SFAs)*, dated August 20, 2014).
- CACFP sponsoring organizations are required to provide documentation indicating they meet their State's criteria for ensuring delivery of benefits to otherwise unserved facilities or participants. SFSP sponsors applying to participate in CACFP are not required to submit any further documentation of providing benefits to unserved facilities or participants.

In addition, the following are required for participation in SFSP and therefore are not required to be produced as part of the CACFP application process:

- *Confirmation of Area Eligibility of Centers:* SFSP sites that establish area eligibility through the use of school data may use their area eligibility determination for SFSP and CACFP afterschool meals for a period of five years. There is no need to re-establish area eligibility for CACFP unless the SFSP and CACFP At-risk Afterschool operations are at different locations.

Area eligibility for CACFP At-risk Afterschool Meals may be based on school data for any month within the year of which the location was eligible or the most recent Census data. Additionally, in situations where data from a more recent month in the school year is available and would establish area eligibility for an otherwise ineligible location, school data from that month could be used to establish eligibility.

- *Non-discrimination Statement:* SFSP sponsors are not required to resubmit a non-discrimination policy statement to participate in the CACFP. Additionally, if the media release submitted for SFSP indicated the sponsor offers year-round meal services, an additional media release is not required.
- *Health and Safety Inspections (Camps Only):* Where the State or local health and safety inspection standards for at-risk afterschool centers and SFSP feeding sites are the same, CACFP State agencies may accept documentation of a current inspection obtained by a sponsor for SFSP when the SFSP camp site is the same location as the At-Risk meals sites.
- *Documentation of Tax-exempt Status:* Private nonprofit organizations are not required to resubmit documentation of tax exempt status for CACFP when such documentation was submitted for purposes of participation in SFSP. However, Bright from the Start will verify the sponsor's tax exempt status with the Internal Revenue Service.

### **Agreements**

As part of the CACFP application process, Bright from the Start shall require SFSP sponsors to sign an SFSP addendum to their existing agreement with Bright from the Start.

### **Training**

Bright from the Start will inform Sponsor administrative staff about Program requirements during required At-risk Afterschool Meals and CACFP training sessions. Attending the CACFP 2-day orientation training is not required, but available if preferred, for SFSP sponsors to transition into the at-risk program.

### **Monitoring Requirements**

All CACFP sponsoring organizations are required to adhere to all monitoring requirements as outlined in Bright from the Start's policy memorandum, "Monitoring Requirements," (dated March 18, 2005). CACFP sponsors must conduct pre-approval visits to each center to discuss Program benefits and requirements and ensure the facility is capable of providing the proposed meal service.

SFSP sponsors are required to visit each site they oversee at least once during the first week of Program operation (*see* 7 CFR § 225.15(d)(2)).

~~Sponsors operating both the SFSP and the At Risk Afterschool Program are not required to monitor their sites following the SFSP requirements and then monitor those same sites again following the CACFP requirements during the school year. Instead, sponsors may follow the CACFP monitoring schedule year-round, as long as one of the three visits occur during the summer months. When implementing the CACFP monitoring schedule year-round:~~

- ~~(a) one of the three annual reviews must occur during the summer, review for SFSP requirements, include the observation of a meal service, and be unannounced; and~~
- ~~(b) two reviews must occur during the school year, review for CACFP requirements, at least one review must include the observation of a meal service, and at least one review must be unannounced.~~

~~Sponsors operating both the SFSP and the At Risk Afterschool Program who elect to follow CACFP monitoring requirements must complete the **CACFP Request for Waiver of Monitoring Requirements for At Risk Afterschool Programs** (see attached). The waiver must be completed and returned to Bright from the Start along with other documentation required for CACFP application approval. Sites that do not operate year round must be reviewed in accordance with SFSP requirements.~~

### **Financial Management**

Excess funds from either CACFP or SFSP may be used in its operation of other Child Nutrition Programs. Therefore, if at the end of the summer a sponsor has excess reimbursement from its operation of SFSP, those funds may be used for allowable costs in its operation of CACFP. Please refer to Bright from the Start's CACFP Budget Guidance Manual for guidelines on the proper use of CACFP funds. (*See also Bright from the Start's policy memorandum, Simplified SFSP and Bright from the Start's Annual Year End Reconciliation Process,* dated August 20, 2014).

### **Required Licensure**

Although flexibilities have been implemented to afford SFSP sponsors a continuous flow of participation in child nutrition programs, this option may not be suitable to all SFSP sponsors. Child care centers, outside-school-hours care centers, and day care homes must be licensed to operate such centers or homes in Georgia. After school care programs participating in the Child and Adult Care Food Program must also be licensed unless exempt from such licensing/registration. Therefore, SFSP sponsors applying to participate in the CACFP must submit documentation verifying they are licensed/registered or are exempt from licensure/registration to ensure continuous participation. For more information concerning licensure, please refer to CACFP Policy No. 01-11 - Licensure of After-School Care Programs in the Child and Adult Care Food Program, which can be found on the Georgia DECAL web site at [www.decal.ga.gov](http://www.decal.ga.gov).

Please also refer to DECAL Policy No. CACFP 07-34, Eligibility Requirements for Participating in the At-Risk Afterschool Care Program.

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