



**Georgia Dept  
of Early Care  
and Learning**  
BRIGHT FROM THE START

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**MEMORANDUM**

To: Institutions Participating in the Child and Adult Care Food Program (CACFP)

From: Tamika Boone, Director of Nutrition Services (*Original Signed*)

Date: September 2, 2020 (v.2.)

Subject: Guidance for Serving School-Age Children in the Child and Adult Care Food Program (CACFP) during COVID-19 (Questions and Answers)

Legal Authority: USDA Memorandum, *School-age Children Certification Statements for the Child and Adult Care Food Program during COVID-19* (August 21, 2020)

On August 21, 2020, the United States Department of Agriculture (USDA) issued questions and answers intended to provide clarification to State agencies and Program operators (institutions) as they transition to the upcoming school year. Specifically, the following question and answer was provided and allows CACFP institutions to serve meals to school age children.

This memorandum has been revised to emphasize specific age-related requirements and supersedes the policy memorandum, *Guidance for Serving School-Age Children in the Child and Adult Care Food Program (CACFP) during COVID-19 (Questions and Answers)*, August 28, 2020.

**Q. May school-age children who are attending school virtually and who are also enrolled and attending child care during the day receive meals through both CACFP and school meal programs?**

*A. Yes. Students enrolled in both school and child care may receive meals through multiple Child Nutrition Programs. However, State agencies must have an integrity plan with appropriate measures in place to ensure that program accountability is maintained and that program meal limits for the School Breakfast Program (SBP), National School Lunch Program (NSLP), and the CACFP are not exceeded. Specific decisions regarding development and implementation of the plan are at the discretion of the State agency. However, the plan must include the process the State agency is implementing. [Question and Answers for Child Nutrition Programs during School Year 2020-2021 – 5, page, 9, #19.]*

**[NOTE: The above response does not apply to children over 12 years of age.]**

Based on this guidance, DECAL is providing key information institutions must follow when serving meals to school age children ages 12 and under during CACFP operations.

**Q. #1. If I will be serving meals to school age children in my center or home, how can I claim these meals for reimbursement?**

School-age children can be claimed under the traditional CACFP program or the At-Risk Afterschool program. Sufficient recordkeeping and adhering to the traditional CACFP and At-Risk Afterschool regulations will be key with a few additional procedures in light of COVID-19. Further guidance on recordkeeping and claiming is provided throughout this document.

**Q. #2. What is meant by States having an “integrity plan” with appropriate measures in place to ensure that program accountability is maintained and that program limits per the SBP, NSLP, and CACFP are not exceeded?**

DECAL’s integrity plan involves institutions certifying to the following: (1) a child’s meal will not be claimed under CACFP if the child is receiving the same meal under another Child Nutrition Program or if the meal is provided by another party such as the parent or guardian; (2) the institution will not claim more than two meals and one snack **or** one meal and two snacks per child, per day for the Child and Adult Care Food Program (CACFP). Institutions will certify that they are following the regulatory requirements and state policy by signing the School Age Certification Statements based on their classification: Independent Center or Sponsor. The completed/signed statements must be maintained on file at the independent center or sponsor location noted in the application and must be made available upon request by USDA, DECAL, or an authorized representative. *Certification Statements for the Child and Adult Care Food Program during COVID-19*, can be found below:

For Sponsors: [http://www.decal.ga.gov/documents/attachments/School-Age\\_CertificationStatementsCACFP\\_COVID19\\_Sponsors.pdf](http://www.decal.ga.gov/documents/attachments/School-Age_CertificationStatementsCACFP_COVID19_Sponsors.pdf)

For Independent Centers: [http://www.decal.ga.gov/documents/attachments/School-Age\\_CertificationStatementsCACFP\\_COVID19\\_IND.pdf](http://www.decal.ga.gov/documents/attachments/School-Age_CertificationStatementsCACFP_COVID19_IND.pdf)

**Q. #3. How will DECAL validate institutions are carrying out the aforementioned certification statements?**

Institutions will be required to adhere to regulatory requirements when serving meals to children, maintain required documentation, and edit-check and submit accurate claims for reimbursement. For sponsoring organizations, sponsors must train key staff on all requirements, adequately monitor their facilities, and conduct edit checks for all reimbursement claims received to ensure there are no duplication of meals or an excessive number of meals served per child per day. Institutions must follow the guidelines in CACFP Policy #18 – Recordkeeping Requirements to ensure the appropriate documentation is maintained. Policy #18 can be found [here](#). DECAL or authorized representatives will confirm during monitoring reviews that certification statements are on file and that state and federal requirements are being met.

**Q. #4. How does this provision impact CACFP and At-Risk Meals specifically?**

In response to the COVID-19 pandemic, many school systems have opted to begin the FY 2020-2021 school year via a virtual platform. This means, students who normally participated in the At-Risk Afterschool component of the CACFP may now participate in child care settings during the day. For institutions operating the CACFP and At-Risk Afterschool Program, the chart on the following page outlines additional procedures institutions must follow.

	<b>CACFP Traditional Only</b>	<b>At-Risk Afterschool Only</b>	<b>Operating Both Programs</b>
Legal Authority	7 CFR 226.17, 18, and 19	7 CFR 226.17a	Same as listed for each Program.
Maximum Number of Meals Per Child Per Day	2 meals and 1 snack or 1 meal and 2 snacks per eligible child per day may be claimed for reimbursement.	<ul style="list-style-type: none"> <li>1 at-risk afterschool snack and 1 at-risk meal per eligible child per day may be claimed for reimbursement.</li> <li>At-Risk Meals must be served after school, except on weekends and holidays, when meals may be served at any time of day, as approved by the State agency, 7 CFR 226.17a(m).</li> </ul>	No more than 2 meals and 1 snack or 1 meal and 2 snacks are served per eligible child per day across all CACFP programs (Traditional and At-Risk Afterschool).
Meal Servings Per Age	Institutions must ensure meal pattern requirements per age group are met (i.e., Infant Age Groups: 0-5 months old and 6-11 months old; Child age groups: 1-2 years; 3-5 years and 6-12.	Institutions must ensure meal pattern requirements per age group are met.	Institutions must be mindful of the variation in required quantities and serving sizes per age group.
Required Records	<p>Required records include, but are not limited to:</p> <ul style="list-style-type: none"> <li>School-age Children Certification Statement (if school-age children are served meals)</li> <li>Roster</li> <li>Documentation used to determine income eligibility for the participants (i.e., IES forms)</li> <li>Daily and Monthly Attendance Records</li> <li>Enrollment documentation</li> <li>Weekly Menu and Food Service Records</li> <li>Meal Count Form (DCH Providers)</li> <li>Copies of invoices and receipts for food purchases using CACFP funds</li> <li>Monitoring records – for sponsoring organizations</li> <li>See also CACFP Policy #18</li> </ul>	<p>Required records include, but are not limited to:</p> <ul style="list-style-type: none"> <li>A roster is not required if the institution solely operates the At-Risk afterschool program. However, daily attendance records are required.</li> <li>At-Risk only participants should not be listed on your CACFP Roster and should not be included in your Income Eligibility totals (Free, Reduced and Paid) on the claim. It is recommended to keep separate attendance records for At-Risk participants.</li> <li>At-Risk Weekly Menu and Food Service Record</li> <li>Monitoring records – for sponsoring organizations</li> </ul>	<ul style="list-style-type: none"> <li>Same as listed for each Program</li> <li>Rosters (required for institutions operating both a traditional childcare program and an At-Risk afterschool program)</li> </ul>

	<b>CACFP Traditional Only</b>	<b>At-Risk Afterschool Only</b>	<b>Operating Both Programs</b>
Ineligible Meals	<ul style="list-style-type: none"> <li>Meal types (Breakfast, Lunch, Snack, Supper) that are also served by another child nutrition program</li> <li>Meals prepared and brought from the child's home</li> <li>Meals in excess of 2 meals and 1 snack <b>or</b> 1 meal and 2 snacks per child, per day</li> <li>Children who did not receive a meal</li> <li>Meals served to children who are not enrolled</li> </ul>	<ul style="list-style-type: none"> <li>Meal types (Breakfast, Lunch, Snack, Supper) that are also served by another child nutrition program.</li> <li>Meals prepared and brought from the child's home</li> <li>Meals in excess of 1 meal and 1 snack per child, per day</li> <li>Children who did not receive a meal</li> </ul>	<ul style="list-style-type: none"> <li>Meal types (Breakfast, Lunch, Snack, Supper) that are also served by another child nutrition program.</li> <li>Meals prepared and brought from the child's home</li> <li>Meals in excess of 2 meals and 1 snack <b>or</b> 1 meal and 2 snacks per child, per day.</li> <li>Children who did not receive a meal</li> <li>Meals served to children who are not enrolled</li> </ul>
Enrichment Activity Requirement	N/A	Required.	Must provide this activity if operating the At-Risk Afterschool Program

**Q. #5. Must a student be enrolled at a child care facility to receive meals under the traditional CACFP program?**

Yes, under the traditional CACFP program, meals can only be claimed for children enrolled in the center or day care home (facility). This includes school-age children during the COVID-19 pandemic. As a reminder, a child is considered enrolled when a current document is signed and dated by a parent or legal guardian, and is available, accurate, and confirms the child ate at least one meal during the claim month. The child must be included in the number of children enrolled (also known as the enrollment number) and claiming percentages and meals may be claimed for the child. Meals should not be claimed for child participants: (a) lacking a current document that is signed and dated by a parent/legal guardian; (b) lacking a current document that indicates the child is enrolled for child care; (c) lacking documentation confirming the child was in attendance for at least one meal during the claim month; and/or (d) whose enrollment form has expired. (See also the DECAL policy memorandum, [Updated Guidance for Determining and Calculating Enrollment for Child Care Centers and Day Care Homes \(Revised\) \(October 1, 2019\)](#)).

**Q. #6. Can I continue serving my At-Risk After School participant meals and not obtain enrollment and Income Eligibility forms?**

Yes, institutions can still claim up to 1 meal and 1 snack under the At-Risk program; however, At-Risk only participants should not be listed on the Roster and should not be included in the Income Eligibility totals (Free, Reduced and Paid) on the claim. At-Risk After School participants cannot be claimed under traditional CACFP without enrollment documentation and an Income Eligibility Statement on file at the facility.

**Q. #7. I have several At-Risk After School participants now attending my facility during the day for virtual learning, what is required if I now want to claim them under traditional CACFP?**

1. At-Risk participants should not be included on the Roster, unless they were present when claiming the 2 meals and 1 snack in the traditional CACFP program for the participants during a holiday, school break, or weekend.
2. Enrollment Records and Income Eligibility Statements must be collected for each participant to claim meals in traditional CACFP. Once the facility has obtained the required documentation, the participant may be added to the CACFP Roster and included in the traditional meal count, as long as the participant was present during the claim month and received a meal prepared by the facility.
3. School-age Children Certification Statement (if school-age children are served meals).

**Q. #8. Can a child receive more than two meals and one snack if they are at a child care facility for the entire day (i.e., breakfast, lunch, snack, supper) under the Traditional CACFP and the At-Risk Afterschool program?**

No, an institution cannot exceed the maximum number of meals per child per day if enrolled at a child care facility for an entire day. As a reminder, the two meals and a snack (**or** one meal and two snacks) per child, per day requirement encompasses all CACFP programs (CACFP and At-Risk). This requirement is not applied separately for each CACFP program.

For example:

John Smith, a school age child, is attending school virtually and he is also enrolled for care at a CACFP facility. The facility operates both traditional CACFP and At-Risk meals. The facility may serve CACFP meals to John, however, the facility may not exceed the maximum number of meals per day under both programs combined. Once the facility serves 2 meals and a snack or 1 meal and 2 snacks under the traditional CACFP, the facility has reached the maximum number of meals that can be claimed for John that day. Any additional meals are ineligible for reimbursement.

Jane Smith, also a school age child, normally participates in the At-Risk Afterschool Program. At the start of the school year, she is enrolled in care at a facility for the entire day for school virtual learning. The facility operates both CACFP and At-Risk. Jane receives, breakfast, lunch, and an afternoon snack, under the CACFP. At the end of the school day, if Jane is also served an additional evening snack and supper under the At-Risk Afterschool program (3 meals and 2 snacks in total), the At-Risk meals cannot be claimed for reimbursement. Only 2 meals and 1 snack or 1 meal and 2 snacks can be claimed in total.”

**Q. #9. What must an institution do if a parent/guardian brings in the child’s meal or the child is already receiving meals from the NSLP?**

If a child is enrolled and in attendance, but not participating in CACFP, then the institution would not be required to have an income eligibility statement on file for that child and the child would not be included in the meal counts or income eligibility totals on the claim. Should the child ever be served a meal, and the institution does not have an income eligibility statement for the child, the meals must be claimed under the paid category.

**Q. #10. When Georgia DECAL conducts a review of my facility(ies), what items should I have available as it relates to serving meals to school age children?**

Institutions must ensure they maintain records in accordance with the chart above and all other recordkeeping requirements as outlined in Policy #18. As a reminder, failure to maintain records in accordance with Federal regulations and/or DECAL policy, or failure to provide access to records that directly support any claim(s) for reimbursement, may result in a meal reclaim for the period covered by the records in question, or disallowed costs for the period covered by the records in question.

In order to file an accurate claim for reimbursement, refer to Instructions for filing a CACFP Claim for Reimbursement found here: <http://www.dec.al.ga.gov/documents/attachments/InstructionsFilingClaim.pdf>

For additional questions concerning the policy, please contact the Provider Services Senior Manager at (404) 463-2566 or via email at [Sonja.Adams@dec.al.ga.gov](mailto:Sonja.Adams@dec.al.ga.gov).