



# Georgia Dept of Early Care and Learning

BRIGHT FROM THE START

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## MEMORANDUM

**Subject:** The Use of Vending Machines in School Food Authority CACFP At-Risk Afterschool Meals Programs

**Date:** July 15, 2022

**Legal Authority:** SP 03-2007; 7 CFR § 226.20(a); 7 CFR § 226.17; 7 CFR § 200; and FNS Instruction 769-2 Rev.4

**Cross Reference:** DECAL Policy Memoranda, *Streamlined Application Processes in the CACFP for School Food Authorities (SFAs)*, December 19, 2014, *School Food Authorities (SFAs) Participating in the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP)*, August 20, 2014, and *Offer Versus Serve and Family Style Meals in the Child and Adult Care Food Program*, January 10, 2017; and DECAL Policy; and No. CACFP/02-18 and CACFP/17-39

**Applies To:** School Food Authorities Participating in the CACFP

**Purpose:** The purpose of this memorandum is to provide guidance on the use of vending machines in at-risk afterschool meals programs operated by school food authorities.

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This memorandum is to provide guidance to School Food Authorities (SFAs) participating in the CACFP At-Risk Afterschool Meals Program on the requirements associated with the use of vending machines as a dispenser of CACFP at-risk meals.

GA DECAL is aware of the interest SFAs may have in using vending machines as a dispenser of CACFP meals, as SFAs have the opportunity through the National School Lunch (NSLP) and School Breakfast Programs (SBP) to use vending machines as a form of meal distribution to their students. Given that SFAs are participants in the NSLP and SBP and are familiar with ensuring program compliance with regards to vending machine use in those programs, the option to use vending machines as a dispenser of CACFP meals would be allowed in the CACFP but is limited only to SFAs participating in and receiving reimbursement for the CACFP at-risk afterschool meals program. The option to use vending machines is not allowed for the service of SFA preschool participants during traditional CACFP meals (non-At-Risk

afterschool meals), even in the case where preschool participants are served in the same service area and time as grade K-5 students. Traditional mealtimes provide critical opportunities for younger children to further an education in nutrition and develop good eating habits through the exploration of new foods and tastes such as in the optional family style meal service setting.

Note: Non-SFA at-risk afterschool meals programs that are located and provide afterschool activities within a school building may not contract with an SFA to distribute CACFP at-risk meals through vending machines.

### **Requirements Regarding Vending Machine Use**

SFAs must be aware that any vending machine that provides a reimbursable snack or supper meal is subject to Program regulations. Therefore, meals distributed via vending machines are subject to the same procedures, meal pattern and planning requirements, and offer versus serve (OVS) requirements (if applicable) as the meals provided by traditional meal service methods. In addition, SFAs are responsible for having internal controls in place to ensure the following:

- The vending machine can properly dispense a creditable and reimbursable meal;
- There is a method in place to accurately document when reimbursable meals are retrieved by participants and track the number of meals and snacks served to each participant during the meal service;
- SFA staff is present to monitor participants retrieving meals to ensure that required components are served;
- Participants are only able to receive the meal during the approved meal service time listed within the CACFP site application;
- No more than one at-risk snack and one at-risk meal per participant per day are claimed for reimbursement;
- All local and State health and safety requirements are met with regards to internal temperatures of the machines when non-shelf stable foods are served; and
- Adherence to CACFP recordkeeping requirements regarding meals served and claimed as outlined in DECAL Policy CACFP/02-18, *CACFP Recordkeeping Requirements*, October 1, 2020.

Though the use of vending machines may play a role in providing a more efficient and effective method of distributing meals to CACFP at-risk afterschool participants that results in time and labor costs saved, it is critical that SFAs consider how they will approach all facets of meal requirements such as meeting the whole grain rich, OVS, special dietary needs, and recordkeeping requirements.

### **Procuring Vending Machines and Related Costs**

Any use of Program funds for obtaining and maintaining vending machines to dispense reimbursable CACFP meals must be in accordance with 2 C.F.R. § 200 and FNS Instruction 796-2, Rev.4. If charged to the CACFP, purchase and maintenance costs associated with vending machines, just as all costs charged to the Program, must be necessary, reasonable, and properly allocated to the CACFP.

In addition, costs associated with vending machines must adhere to budgetary requirements as described in DECAL's Budget Guidance Manual, if the SFA has not requested and been approved for a waiver to

complete the required annual budget<sup>1</sup>. Whether a SFA has been approved for a budget waiver or not, the SFA would be required to maintain documentation supporting costs associated with vending machines when those costs are charged to the CACFP. SFAs should also be aware that if a vending machine is used for other Child Nutrition Programs (CNPs) in addition to the CACFP at-risk afterschool meals program, then only the properly allocated cost should be charged to the Program. Documentation supporting the cost allocation must also be maintained. In addition, SFAs must ensure compliance with procurement requirements when Program funds are used for the obtaining and maintaining of vending machines.<sup>2</sup>

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

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<sup>1</sup> DECAL Policy Memorandum, Streamlined Application Processes in the CACFP for School Food Authorities (SFAs), August 20, 2014, outlines the flexibilities provided to SFAs participating in the CACFP as in the request to waive the requirements to complete an annual budget and/or management plan and of an SFA's option to follow NSLP procurement standards found in 7 CFR 210.21 in lieu of CACFP procurement standards at 7 CFR 226.22.

<sup>2</sup> See footnote 1