

CACFP Annual Sponsor Training 2017
Tuesday, September 19, 2017
PARKING LOT

	Topic	Question/Discussion	Response/Resolution	Regulation/Reference, if applicable
Meal Count/Attendance				
1		Do we count staff on POS if they eat meals?	No. Staff meals are not reimbursable.	7 CFR 226.1 The program is intended to provide aid to participants.
2		On point of service forms - record number of meals served. What if child doesn't eat all or just part of the meal served?	You can not force a child to eat the meal/snack, but can encourage the participants to try the foods. You have to serve all the required components of the meal/snack to the participant to get reimbursed, but the child does not have to consume all of the meal.	
Food Safety				
3		Shouldn't the cook have a certificate in food handling?	No, this is not a requirement in CACFP. It is a best practice for the cook, and any other food-handler, to receive food safety training.	4458 State of Delaware Food Code Regulations. http://regulations.delaware.gov/AdminCode/title16/Department%20of%20Health%20and%20Social%20Services/Division%20of%20Public%20Health/Health%20Systems%20Protection%20(HSP)/4458.shtml
4		How long can infant formula or breast milk stay at room temperature?	Breastmilk should be stored for a maximum of 6-8 hours, at room temperature, which is up to 77°F. Breastmilk should be covered and kept as cool as possible; covering the container with a cool towel may keep milk cooler.	Academy of Breastfeeding Medicine. (2004) Clinical Protocol Number #8: Human Milk Storage Information for Home Use for Healthy Full Term Infants [PDF-125k]. Princeton Junction, New Jersey: Academy of Breastfeeding Medicine. https://www.cdc.gov/breastfeeding/recommendations/handling_breastmilk.htm 4458 State of Delaware Food Code Regulations. USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
Miscellaneous				
5		If some staff does not need every topic of annual training can these topics be bypassed ex-teachers - may not need receipt or record keeping training.	USDA requires annual training, and that training must include instruction appropriate to the level of staff experience and duties. Therefore, trainings can be modified for each audience.	7 CFR 226.15 Institution Provisions 7 CFR 226.16 Sponsoring Organization Provisions
6		Will a center that has already received a corrective action plan, be disqualified in the future for corrective action?	Administrative Reviews: Corrective Action(s) as a result of an Administrative Review must be fully implemented, and permanently corrected. If the corrective action is determined to not have been fully and permanently corrected, it may result in the institution and/or responsible principals or individuals being determined seriously deficient in its operation of the CACFP. Seriously Deficient (SD): If the Corrective Action was a result from previously being determined SD, and was not fully and permanently corrected, the USDA requires that the State Agency must move to immediately issue a notice of intent to terminate and disqualify the institution and the responsible principals/individuals.	USDA CACFP Serious Deficiency Handbook 7 CFR 226.6

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7		Where does WIC come in to play? Is there a form to be used? Where is it to be included?	Each institution (other than outside-school-hours care centers, at-risk afterschool care centers, emergency shelters, and adult day care centers) must ensure that parents of enrolled children are provided with current information on the benefits and importance of the Women, Infants, and Children (WIC) and the eligibility requirements for WIC participation. At a minimum, WIC information should be posted in a visible location, and/or included in enrollment packets.	2017 CACFP Operational Memo #7 7 CFR 226.15 Institutional Provisions
8		Can we figure out a way for those who have attended repeatedly & consecutively to attend a training maybe every 3 years? If they receive a lot of non-compliance then attendance is mandatory & you must start all over?	No. In accordance with USDA regulations, annual training is required. Additionally, mandatory training sessions for key staff from all sponsored child care and adult care facilities not less frequently than annually. Training can be held more frequently if needed, and when hiring new staff. Training records must be maintained. However, other training platforms will be explored by DDOE for the future.	7 CFR 226.15 Institution Provisions 7 CFR 226.16 Sponsoring Organization Provisions
9		Are there any guidelines/policies on composting food waste at our center?	According to USDA, the Farm to School component of the USDA's 'Know Your Farmer, Know Your Food' initiative (building on the 2008 Farm Bill) is designed to help connect with regional or local farms in order to serve healthy meals using locally-sourced products. Activities may incorporate food-learning opportunities such as farm visits, gardening, cooking, and composting. However, it is highly recommended that you contact your Office of Child Care Licensing (OCCL) representative, and check with Mindy Anthony (DNREC) Office of Solid and Hazardous Waste Management Section at (302) 739-9403 or Mindy.Anthony@state.de.us prior to creating any composting areas.	https://www.fns.usda.gov/tags/child-and-adult-care
10		Thank you for using the words childcare and not daycare :-)	You're welcome! Please keep in mind that we strive to utilize current USDA CACFP terminology.	
11		Can I get a copy of a conflict resolution policy outline that would comply with CACFP guidelines?	We believe this question pertains to the Civil Rights requirement #8 of Conflict Resolution (from the Civil Rights PowerPoint presentation). The USDA currently does not have a standard policy outline for CACFP conflict resolution. However, please contact our office so that we can work with you.	
12		Does this count towards our training hours?	Annual CACFP training is a mandatory USDA Program requirement. The Office of Child Care Licensing (OCCL) did not approve any of FY 18 topics for their training hours.	
13		Why are people allowed to ask questions if you enforce a parking lot procedure? ACCOUNTABILITY!!!	Questions are always encouraged throughout the annual training sessions. However, in the interest of time, if a question was specific to a sponsor/center, or needed additional research, the parking lot was utilized. The parking lot is an opportunity to ensure that everyone receives the questions and answers. DDOE will work towards a more streamlined approach for questions moving forward.	

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14		What records/docu must be permanent and which ones can be destroyed after 3 years plus current?	<p>Permanent records consist of the signed Permanent Agreement, Pre-Award Civil Rights Questionnaire, Non-Pricing or Pricing Policy Statement, Outside Employment Policy Statement, DUNS number, copy of OCCL Approval Letter (includes approved meal types), also 501(C)3 Non-Profit Status Letter (if applicable).</p> <p>The USDA requires that all Program records that support the claim for reimbursement shall be retained for a period of 3 years plus the current, except that if audit findings have not been resolved, the records shall be retained beyond the end of the 3 year period as long as may be required for the resolution of the issues raised by the audit. Otherwise, document compliance with Program requirements, including budgets, accounting records, approved budget amendments, and if a sponsoring organization, management plans and appropriate records on facility operations. Program records include training documents, reviews, corrective action, claims for reimbursement, meal service, serious deficiency process, and other operational requirements. If unsure, please contact our office and provide the document in question.</p>	<p>7 CFR 226.6; 226.10</p> <p>USDA CACFP Adult Day Care Handbook</p> <p>USDA CACFP At-Risk Afterschool Care Handbook</p> <p>USDA CACFP Independent Child Care Centers Handbook</p> <p>USDA Guidance for Management Plans and Budgets</p>
Eligibility Determination				
15		If entered as F,R or PD, & it changes a few months later, do you change it, back date it or leave the original election for a full year?	Due to the year-long duration of eligibility, households are not required to report changes in income, household size, or their participation in a program that impacts their child's eligibility status. Households may voluntarily report a change. If a change is reported that will increase benefits, the change must be put into effect. If the change will decrease benefits (from free to reduced price) or terminate benefits (from free or reduced price to paid) the sponsor must explain to the household the change is not required and will only go into effect if the household requests the change in writing, for example by submitting a new application.	2016-2017 CACFP Operational Memo # 18 REVISED Eligibility Manual for School Meals SY 17-18 Determining and Verifying Eligibility (July 18, 2017) Page 55
16		Does the signature date & effective date need to be the same?	No, the dates do not have to be the same. You will have to decide which signature date (parent or sponsor) you will use for your renewal date. Whichever date you choose, you will have to be consistent. According to the Eligibility Manual for School Meals - Applications must be reviewed in a timely manner. Whenever possible, applications should be processed immediately, and must be processed within 10 operating days.	2016-2017 CACFP Operational Memo # 18 REVISED Eligibility Manual for School Meals SY 17-18 Determining and Verifying Eligibility (July 18, 2017) Page 50

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17		Case # on a POC authorization form is the same as snap/tanf case number. Has not changed. The MCI# identifies each person but case # family.	The case number for SNAP or TANF is in fact the same case number as for Purchase of Care (POC). Centers still should not assume that since a family is getting POC that they are also getting SNAP or TANF. Not all POC recipients are SNAP or TANF recipients. Be sure to continue to ask parents or guardians to provide the case number for you. Centers are not allowed to fill out IEFs on behalf of the household. The Master Client Index (MCI) tracks unique clients in each of the programs within the Department of Health and Social Services (DHSS) and the Department of Services for Children, Youth and their Families.	Per email sent from Aimee Beam on March 28, 2017 (Subject was CLARIFICATION RE: SNAP/TANT Numbers on Income Eligibility Forms in CACFP)
18		If feeder school is automatically low income eligible, does the daycare still need to do IEF's?	Yes, IEFs still need to be completed for the day care children. If you had an at-risk program at your facility then they would be eligible using school feeder pattern. Family Day Care Homes in Tier I category may not need IEFs except for their own children they want to claim. Tier 1 Day Care Homes can use school or census data to qualify.	7 CFR 226.115(f)
19		Will DENARS notify a sponsor when the area or eligibility needs to be updated/re-verified?	DENARS will not notify when area or eligibility of participants/Centers needs to be updated. This is reviewed annually as part of reapplication.	
20		If a family is checking YES to SNAP or TANF. It states move to part 4 (after writing case#) SS# is in part 3 it should be moved to part 4 then.	The form has been revised, and is accessible from the DDOE CACFP Forms webpage.	2018 CACFP Operational Memo # 2 - REVISED Income Eligibility Forms and Enrollment Forms
21		How long do we have to keep eligibility form after a child is withdrawn?	The current year plus three years needs to be kept at the facility. The current year needs to be accessible, but the previous years can be stored at the facility. You should be able to show the 3 previous years paperwork to DDOE/MH MILES during an Administrative Review. Reminder - Eligibility information is confidential and must be maintained securely on site.	7 CFR 226.15

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22		Once a roster is certified in DENARS, can an addition be made to the roster that would be dated with a date prior to the last certification date?	<p>This question was presented to USDA, and the specifics would need to be known. USDA provided the following:</p> <p>If the question is based on a sponsoring organization of sites/facilities, it is possible that the sites may have provided inaccurate information, realized the error, and submitted a revision OR the sponsoring organization may have realized they made a mistake in the consolidation of their sites. It is also possible that an independent center could have made a mistake in their original submission. If an institution wants to submit a revision to the original, why would they date it prior to the original? The only reason could be is so that the claim isn't past the 60-day claim reimbursement submission dead line. In that case, they would need to request a one-time exception. A revision within the 60-day timeline would be acceptable, but it shouldn't be dated prior to the original. For more information please contact the Nutrition Office.</p>	
23		If a child is Head Start or ECAP - and therefore categorically "free" - is it necessary for the parent to fill out the household income section of the income eligibility form.	No, they don't need to complete the income section.	USDA Memo CACFP 11-2013
24		Last sponsor training we were told daycares did not have to give families a letter re: determination has something changed?	Only Institutions that are Pricing Programs must notify the families of their eligibility status. All others do not need to send a letter.	7 CFR 226.23
25		What is the correct start date on an renewal IEF when they first start or when it is renewed can we put the date on or the parent?	<p>The IEF has to be fully completed by the parent or guardian.</p> <p>The only thing the Sponsor should be completing is the "Sponsor Only" section at the bottom of the form.</p>	2016-2017 CACFP Operational Memo #18 REVISED Eligibility Manual for School Meals SY 17-18 Determining and Verifying Eligibility (July 18, 2017).
26		If a IEF is not returned by the end of the month of the parent signature date, are they counted as paid until a new form is returned?	Yes, the eligibility would be paid until the new form is completed as long as enrollment information is on file.	
27		If foster child who fills out income form? State? Foster parent? Our foster parent refused to fill it out.	The Healthy, Hunger-Free Kids Act of 2010 amended Section 9(b)(5) of the NSLA to allow certification of children in foster care for free meals, without application, if the local educational agency or other institution administering a Child Nutrition Program obtains documentation from an appropriate State or local agency indicating the status of the child as a child in foster care. These provisions were effective October 1, 2010.	USDA CACFP 08-2011 (April 16, 2013)

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28		What do we do if a parent refuses to fill out income section? What eligibility do they under free paid or reduced?	The institution shall take the income information provided by the household on the application and calculate the household's total current income. When a completed application furnished by a family indicates that the family meets the eligibility criteria for free or reduced-price meals, the participants from that family shall be determined eligible for free or reduced-price meals. When the information furnished by the family is not complete or does not meet the eligibility criteria for free or reduced-price meals, institution officials must consider the participants from that family as not eligible for free or reduced-price meals, and must consider the participants as eligible for paid meals. It would be a best practice if the parent/guardian refuses to complete the income section of the IEF, have them write refuse, deny, etc. in the income section. It would then allow for "paid" reimbursement. If a family just leaves the income section blank, then "0" income is assumed and the form needs to be processed as free.	7 CFR 226.23(e)(ii)(E)(4)
29		What part of the IEF does the parent fill out, what part can a center fill out, can the center fill in the missing info?	The IEF has to be fully completed by the parent or guardian. The only thing the Sponsor should be completing is the "Sponsor Only" section of the form. No, the Center cannot complete missing information. According to the Independent Child Care Center's Handbook - A child's free and reduced income eligibility information must be obtained on a form that is completed, signed, and submitted by the child's parent, guardian, or other household adult.	Independent Child Care Centers A Child and Adult Care Food Program Handbook (page 21)
30		If the center participates in a head start program is the entire center qualified for free lunch?	Only if the entire Center is a Head Start program. If not, only the Head Start children would qualify as free. IEFs would need to be completed by the other families participating in your program that are not participating in ECAP/Head start.	Independent Child Care Centers A Child and Adult Care Food Program Handbook (page 7)
31		You have to move the total household members box and the last 4 digits of SS# under part 4 as per your instructions on back.	The Form has been revised, and is accessible from the DDOE CACFP Forms webpage.	2018 CACFP Operational Memo # 2 REVISED Income Eligibility Forms and Enrollment Forms
Infant Feeding				
32		Is meal reimbursable if parent asks for cereal @5 months and is given formula too?	Yes, a meal can be reimbursable for an infant under 6 months who is getting formula/breastmilk and Iron fortified infant cereal. Some infants may be developmentally ready for solid foods prior to 6 months. Providers should work closely with parents/guardians in this area. We suggest documenting parent instructions.	7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers. (Attachment A, page 7 question 1).

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33		Must a center document when a mother breastfeeds @ center?	Yes, as required for point of service meal counts. This can be accomplished by simply making a note on the meal count sheet, having a sign in sheet for breastfeeding mothers, or another way approved by the Nutrition Office.	7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
34		What if mom of a 6-7 mo/old wants juice in every other bottle? Doctor's note?	USDA regulations do not allow juice to be served for any infant meals or snacks. The only way juice can be served to infants as part of a reimbursable meal or snack is to have a doctor's note on file stating juice is ok to be served.	7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
35		Are you required to list amounts served in the new infant meal pattern?	No, listing the amount of food and/or formula served to infants is not required.	7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
36		What is required at infant snack must they have fruit every snack? How many components?	Reference the infant meal pattern. Fruit is not required at every snack. At least two components must be served. It is a best practice to serve a fruit or vegetable during snack.	Infant snack meal pattern. 7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
37		Cereal in bottle? Acid reflux as reason	A doctors note is required in order to serve infant cereal in a bottle.	USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers.
38		If an infant eats every 2 hours, and is at the center 10 hours a day (5 bottles) made by the center, using center's formula. We are only reimbursed for 3 of the bottles (breakfast, lunch, snack). How can a center obtain reimbursement for the other 2 bottles? since the center buys the infant formula?	USDA regulations only allows reimbursement for two meals and a snack or two snacks and one meal per participant per day. Except that reimbursement may be claimed for two meals and two snacks, or three meals and one snack served to a child for each day in which that child is maintained in care for eight or more hours.	7 CFR 226.17(b)(3)
39		Can a parents note be good enough to use whole milk on a child under 12 months?	No, not for whole milk. Possibly for a lactose free milk substitute.	DDOE Memo #3 2016 Milk and Milk substitutes
40		Infants at snack - 5-11mos If fruit/veg is being served does another component have to be served to meet requirement? Chart states (zero) 0-2 oz tsp. etc.	If the infant is developmentally ready to consume solid foods then the answer is yes, another component must be served when a fruit or vegetable is being served.	7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
41		Why does tool kit say 0- If its required?	Infants grow and develop at different times. To accommodate infants who may not be able to eat solid foods by 6 months, the meal pattern allows for this scenario. When an infant is developmentally ready to eat solid foods, they must be offered every food component.	7 CFR 226.20(b), USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
42		Is there a 1 month transition to switch from whole milk to 1% milk?	Yes	USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers
43		We have a dr's note directing cereal be put in infants bottle. Can a parent of a different child write the same kind of note?	No	

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44		If we receive a Dr's note requesting feeding less ounces or less frequent feedings during the day, is this okay?	Yes, follow the doctor's orders.	
45		Will the parent income form for infant serve as parent note for allowable food?	No, the forms are not comparable. Note: it is only a best practice to obtain, in writing, parent food preferences for their infant, this information can be gathered in many forms.	
Allergies/Accommodations				
46		We are peanut free. Is soy nut butter allowed?	<p>Yes, it is allowed. Refer to the Crediting Handbook for the CACFP:</p> <p>Page 27: 2 tablespoons provides 1 oz. equivalent meat alternate. Soy nut butter may be a good alternative for participants who are allergic to peanut butter.</p> <p>Page 29: Peanut butter has always been included as a meat alternate in the CACFP because of its high protein content. Other nut and seed butters have become available and are also now creditable. Food consumption habits and preferences are influenced by many cultural, ethnic, economic, religious, and environmental factors. The use of these products as a meat alternate reflects current food consumption habits and nutrition information. Nuts are not recommended for children under 3 years of age because choking may occur. Adult day care providers should also consider their elderly participants carefully to determine if choking is a potential concern. Please also be aware that some individuals may have food intolerances or allergies to these foods.</p>	Crediting Handbook for the CACFP

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47		When we have children that are allergic to cows milk do we have to serve milk (almond, coconut or soy) Or can we serve those children water?	<p>Milk is a required component of the breakfast, lunch and supper meal patterns. When a child cannot consume cow's milk, a substitute that is nutritionally equivalent to milk must be served, unless a medical note provides a different instruction.</p> <p>You may be reimbursed if a child is unable to have milk for medical reasons or other special dietary needs when you obtain a written medical statement from a recognized medical authority or parent request stating that the participant should not be served milk. An appropriate substitution must be provided to the participant. Non dairy beverages offered as fluid milk substitutes must be nutritionally equivalent to milk and provide specific levels of calcium, protein, vitamins A and D, magnesium, phosphorus, potassium, riboflavin, and vitamin B-12. Crediting Handbook for CACFP (pg. 16) Almond milk maybe creditable. Most commercial almond milks are not nutritionally equivalent to milk and will not meet the requirements. Soy or Soybean milk, Fortified - soybean milk may be served as a milk substitute because of medical or other special dietary needs.</p>	2017 Operational Memo # 4 Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the CACFP, Questions and Answers
48		If a parent will not allow any type of milk to be offered to their child (water only) can the center claim the meals served to this child?	No, the breakfast, lunch and supper meals would not meet the required meal pattern for reimbursement. Snacks could be reimbursed since milk is not a requirement.	2017 CACAP Operational Memo # 20 - Early Implementation of CACFP New Meal Pattern
Procurement				
49		Are center's allowed to receive donated meals from parent's, organization, etc.?	Food served to children, whether prepared at the center, by a Food Service Management Company (FSMC), or donated, must be prepared and served under the applicable food safety regulations. Donated foods should be documented on the DDOE Donated Goods form (DDOE CACFP Forms https://www.doe.k12.de.us/Page/2808).	Delaware Regulations for Early Care and Education and School-Aged Centers Delaware Food Code
50		Can we use a (1) particular vender (ex. Sam's, Walmart) to purchase the majority of our food on a regular basis?	If using the micro-purchase method, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable. If the purchase falls between \$3,501 and \$24,999, then the small purchase method should be used (obtain price quotations from an adequate number of qualified sources, document, select lowest price).	2 CFR §200.320 - Methods of procurement to be followed. CACFP Annual Training Power Point - Federal Procurement Standards - 2018

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51		<p>Many centers are using No VICK Foods or Us Foods, they <u>do not</u> sign a contract (per FSMC). They are a distributor? How do we handle these situations? Go/to ea. distributor for quotes? What if the amt is more than \$24,999?</p>	<p>If using the micro-purchase method (\$3,500 or less), the non-Federal entity must distribute micro-purchases equitably among qualified suppliers (the sponsor/center cannot purchase from the same vendor every time). Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable. If the purchase falls between \$3,501 and \$24,999, then the small purchase method should be used (obtain price quotations from an adequate number of qualified sources, document, select lowest price). If the purchase is \$25,000 or more, than the formal procurement method must be used.</p> <p>Centers should analyze the total purchases being made from the food suppliers. It may be more cost beneficial to complete an informal or formal procurement than making individual purchases. Purchases should not be split up to avoid the procurement thresholds.</p>	<p>2 CFR §200.320 - Methods of procurement to be followed.</p>
52		<p>How long does the procurement process normal take?</p>	<p>The length of the procurement process depends on which type of procurement method is used. The three methods, which are micro-purchase, small purchase and formal procurement, each have specific steps that need to be taken. Formal procurement typically takes the longest amount of time due to having to publicly advertise the solicitation for 14 days prior to receiving bid responses.</p>	<p>2 CFR §200.320 - Methods of procurement to be followed.</p> <p>CACFP Annual Training Power Point - Federal Procurement Standards - 2018</p>
53		<p>Does a sponsor of multi-centers enter an RFP/IFB for individual centers or as a whole?</p>	<p>Sponsors of multiple centers can use one IFB/RFP for all of their centers, or they can use separate IFB/RFPs for each, depending on what works best for the sponsor and centers. If using one IFB/RFP, the sponsor will need to ensure that the specifications clearly state which centers will be participating (including address, estimated meal quantities, etc.), as well as ensure the menus provided in the bid document include all participant age groups that will need to be served under the contract.</p>	<p>CACFP Annual Training Power Point - Federal Procurement Standards - 2018</p>
54		<p>If procurement prices are listed on the state procurement website, do we still have to solicit bids?</p>	<p>Non-profit institutions can purchase goods or services off of State of Delaware contracts (Office of Management and Budget). If using these contracts, non-profit institutions do not have to obtain quotes or solicit bids for these goods/services since the State of Delaware has already completed the procurement process. For more information in regards to a specific contract, please visit the State of Delaware Awarded Contracts Directory (see link in next column). Each contract has a State contract officer listed along with their contact information.</p>	<p>State of Delaware Awarded Contracts Directory</p>

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55		If I am using Novick Brothers for food deliver (which is not under contract) & I also use Sam's Club, do I need to complete a small purchase procurement?	Either micro-purchase, small purchase or formal procurement method should be followed, depending on the amount of the purchase. If the purchase totals each fall under the micro-purchase threshold (\$3,500 or less), then an Institution can use the micro-purchase procedures. However, institutions must keep in mind that purchases must be distributed equally amongst qualified suppliers (for example, frozen corn cannot be purchased from the same supplier each time, because that would not be distributing purchases equitable). It may be more beneficial to use small purchase procedures or formal procurement, in order to ensure the sponsor is getting the best product at the lowest price. Per 2 CFR §200.320: (a) <i>Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (§200.67 Micro-purchase). To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.</i> If the purchase falls between \$3,501 and \$24,999, then the small purchase method should be used (obtain price quotations from an adequate number of qualified sources, document, select lowest price).	2 CFR §200.320 - Methods of procurement to be followed.
56		What happens if you start the year under \$150k but grow do you need to change or do a new RFP?	In Delaware, the threshold for formal procurement is \$25,000 or more. Since this is more restrictive than the USDA threshold of \$150,000, we must follow Delaware's threshold. When your institution grows, re-evaluate your institution's expenditures annually (you would not need to rebid mid-year).	CACFP Annual Training Power Point - Federal Procurement Standards - 2018
57		What kind of documentation is required for micro- purchase- 3 loaf of bread, 6-gallon milk.	Receipts and/or invoices must show that micro-purchases are being distributed equitably amongst qualified suppliers. Per 7 CFR §226.22(k) <i>Procurement standards, Institutions shall maintain records sufficient to detail the significant history of a procurement. These records shall include, but are not necessarily limited to information pertinent to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the cost or price.</i>	7 CFR §226.22 Procurement standards.
58		If we have a contract with a vendor and contract is up. Do we have to start all over again? By placing an ad, getting bids and awarding contracts?	Delaware CACFP procurement contracts shall be for a period of one year; in this case, upon expiration of the contract the sponsor must start over and follow the proper procurement procedures. Please note, some sponsors include a statement in the bid specifications in regards to contract renewal prior to the expiration of the contract (by mutual agreement between the sponsor and the contractor). Contract extensions must receive prior approval by DDOE.	

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59		Milk - I have 10 gallons delivered by a milk company. I can get cheaper at Acme. But I like the convenience of delivery. Do I have to go to Acme?	If the proper procurement procedure was followed to purchase the milk from the milk company (or if the organization is a non-profit, the milk is being purchased off the State of Delaware milk contract), then the sponsor can continue to purchase the milk from the milk company. However, if proper procurement procedures were not followed, then depending on the purchase amount, either micro-purchase, small purchase or formal procurement method must be followed to purchase the milk.	2 CFR §200.320 - Methods of procurement to be followed.
60		If I usually shop at BJ's twice a month about \$2000 for food. If I check Costco and they have a better price on 2 items do I have to buy some items from BJ's and some from Costco?	If using the micro-purchase threshold, institutions cannot purchase from the same supplier/vendor for every purchase. This is not distributing the purchases equitably.	2 CFR §200.320 - Methods of procurement to be followed.
61		Is the \$3,500 in one purchase? Is the \$25,000 per month or per year with all of the purchases? (IE: \$1,000 month on paper products/\$12,000 year)	Per 2 CFR §200.320, Procurement by micro-purchase is the acquisition of supplies or services, the <i>aggregate</i> dollar amount which does not exceed the micro-purchase threshold (\$200.67 Micro-purchase). Currently, the micro-purchase threshold is \$3,500. If a sponsor has signed a contract or purchase order with a vendor for goods to be delivered on a set schedule, then the total estimated dollar value of the contract determines if the procurement must be conducted using micro-purchase, small purchase or formal bid methods (in this case a delivery is not considered a separate procurement).	2 CFR §200.320 - Methods of procurement to be followed.
Meal Pattern				
62		May children over 1 be offered breast milk as part of the meal pattern?	Yes, best practice is to have a note from the doctor.	USDA memo CACFP 06-2017, Feeding Infants and Meal Pattern Requirements in the Child and Adult Care Food Program; Questions and Answers.
63		Can grain based dessert (i.e. graham cracker) be served as snack?	Graham crackers and animal crackers are allowed to be served during snacks. Please note graham crackers and animal crackers are no longer considered grain based desserts. All grain-based desserts are no longer allowed.	USDA memo CACFP 16-2017 Grain-Based Desserts in the Child and Adult Care Food Program
64		Are children able to get second portions of meals? Can cinnamon be used to give flavor to milk instead of syrup for the younger children? (i.e.. 3years old)	Second meals are not reimbursable in CACFP. Cinnamon may be used to flavor milk.	7 CFR 226.17(b)(3)
65		Is popcorn ever a creditable food? Is 100% wheat belvita bars with 9 grams of sugar okay?	Popcorn is not a creditable food item in CACFP. Belvita bars are classified as a "breakfast bar" which is considered a grain-based dessert, and cannot be served.	Crediting Handbook for the Child and Adult Care Food Program . USDA memo CACFP 16-2017 Grain-Based Desserts in the Child and Adult Care Food Program
66		Can we serve fruit cups without the syrup? Applesauce?	Yes, fruit cups and applesauce can be served to meet the fruit requirement.	7 CFR 226.20(C)

	Topic	Question/Discussion	Response/Resolution	Regulation/Reference, if applicable
67		How soon should the posted (lobby or parents) menu be changed to align with the working/kitchen menu?	The working cooks menu should be updated as soon as the menu is changed. Other menus may be changed at your discretion. Some menus could state: " <i>Menu subject to change</i> "; compliant menus must be maintained and filed on site as a document to support the monthly claim.	
68		Can we disallow a meal if no drink is served - i.e. water? If they write "water is offered at every meal" on top of menu, is that okay?	Breakfast, Lunch and supper will be disallowed if no milk is served. Water is not a creditable meal component. Water is required to be offered throughout the day and with each meal or snack. It is best practice to write "water" on the snack menu when no other beverage is served. Snacks will not be disallowed if water is not listed on the menu.	7 CFR 226.20(C)
69		Now we can serve meat alternate/nitrate once a week instead of 1 x every 2 weeks?	It is a best practice to limit processed meat no more than one serving per week. The old Delaware Nutrition Guidelines recommended processed meats only once in a 2 week cycle.	CHILD AND ADULT CARE FOOD PROGRAM: BEST PRACTICES, resource guide. https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_factBP.pdf
70		Can children be given seconds when there is not enough to give all the children? Is this considered discrimination?	Second meals are not reimbursable. It is the center's discretion to serve seconds.	7 CFR 226.17(b)(3)
71		Are whole grain low sugar cereals (6g/ serving) allowed as a grain snack?	Yes, whole grain cereals which are 6 grams or less of sugar per dry ounce may be served as a snack to both infants and children.	7 CFR 226.20, USDA memo CACFP 16-2017 Grain-Based Desserts in the Child and Adult Care Food Program
Finance				
72		Does a center need to have an allocation formula approved yearly? Is it ok to use the same allocation that was already approved?	No, allocation formulas are permanent documents. If the square footage of your center changes then a new allocation formula will be required.	FNS instruction 796 - 2 rev 4
73		Does the donated food log carry over to SFSP?	No, please keep two separate logs.	
74		Unloading a delivery truck food service labor or admin labor?	Foodservice labor.	FNS instruction 796 - 2 rev 4
75		How is gas mileage paid out? To the sponsor or to the person actually driving the miles? (mileage logs?)	Mileage is not a reimbursable expense, it's an allowable expense. All CACFP funds received are from serving compliant meals. This money can be used for a variety of allowable expenses, including mileage. The mileage log will indicate the dollar amount allowed taken from the monthly CACFP reimbursement and used toward vehicle expenses, regardless of which employee's vehicle is used.	FNS instruction 796 - 2 rev 4
76		Is it a requirement to have a separate bank account for only CACFP?	No, this is a best practice. CACFP funds must be clearly maintained viable option include; separate bank account, general ledger with chart of accounts or the worksheet for reporting monthly CACFP costs.	FNS instruction 796 - 2 rev 4
77		Do staff that partake in the food program get a separate check from the check they get from the center?	No, this is not required.	FNS instruction 796 - 2 rev 4

	Topic	Question/Discussion	Response/Resolution	Regulation/Reference, if applicable
78		A staff person who does both food service labor and admin labor, can both CACFP duties hours be listed on the same form?	Yes	FNS instruction 796 - 2 rev 4
79		What happened to our eligibility to purchase with -in lue- money. Food such as schools receive. If elig. Please provide more info to participate.	Eligible sponsors in CACFP that serve lunch or supper meals get cash-in-lieu funds. These funds are given instead of an actual commodity food entitlement.	Contact our office for more information