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United States Department of Agriculture

Food and
Nutrition
Service

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DATE:	June 12, 2023
MEMO CODE:	CACFP 08-2023, SFSP 10-2023
SUBJECT:	Best Practices for Streamlining Applications for Year-Round Program Operations
TO:	Regional Directors Child Nutrition Programs All Regions State Directors Child Nutrition Programs All States

Issuing Agency/Office:	FNS/Child Nutrition Programs
Title of Document:	Best Practices for Establishing a Single Application Process to Support Year-Round Meal Services for At-Risk Children in Low-Income Areas
Document ID:	
Z-RIN:	
Date of Issuance:	June 12, 2023
Replaces:	N/A
Summary:	(1) This memorandum provides best practices for establishing a single application process for experienced program operators providing year-round meal services to at-risk children in low-income areas. (2) This memorandum applies to State administering agencies and local organizations operating both the Summer Food Service and Child and Adult Care Food Programs. (3) This document relates to 7 CFR 225.6(c)(3), 225.6(c)(4), 225.6(e), 225.6(e)(4), 225.14(c)(1)(i), 226.6(b)(1), 226.6(b)(2), and 226.6(f).

This memorandum provides guidance to assist State agencies in streamlining the application process for experienced program operators that participate in both the Summer Food Service Program (SFSP) and the at-risk afterschool component of the Child and Adult Care Food Program (CACFP). These programs leverage Federal funds to help children get the nutrition they need during the gap periods when they are out of school. However, CACFP is not available to at-risk afterschool care centers during the summer, and SFSP does not normally operate during the school year. A single application process would help State agencies reduce the paperwork to make it easier for experienced program operators to provide meals year-round to at-risk children and young people in low-income areas.

USDA's Food and Nutrition Service (FNS) encourages community organizations that offer CACFP afterschool meals during the school year to transition to SFSP to serve the same groups of children during the summer months. For some community organizations, the paperwork for participating in two separate programs diverts resources away from serving the children who are most in need. A single application process could simplify the paperwork by minimizing duplication and reducing administrative burden. This guidance recommends options for streamlining the application process for experienced program operators in States where the same administering agency is responsible for both programs.

Apply existing flexibilities to simplify program operations:

Flexibilities that currently exist in CACFP and SFSP regulations and policy guidance provide opportunities for State agencies to decrease paperwork burden for program operators without compromising integrity. FNS has previously issued guidance (cited below and further explained in the Appendix) to provide more options for managing resource challenges and allow accommodations that make it easier for community organizations to provide afterschool and summer meals. These options eliminate duplication to make participation less burdensome for community organizations and more cost-effective for State agencies to administer.

- Streamline the application and renewal process where possible. For example, a State agency that requires renewing CACFP institutions or experienced SFSP sponsors to complete requirements beyond what is required in FNS regulations, may want to consider modifications to simplify the process. [CACFP 19-2011]

- Implement policies that allow renewing institutions to submit a single electronic certificate to document that all CACFP requirements have been met and that any necessary changes have been submitted to the State agency. [CACFP 19-2011]

- Do not require additional documentation on CACFP applications from SFSP sponsors that they provide benefits to otherwise unserved facilities or participants. [CACFP 12-2013]

- Accept successful operation of SFSP as evidence that SFSP sponsors have practices in place to ensure that the meal service, recordkeeping, and other program requirements are performed properly. Additional documentation from an SFSP sponsor is not necessary to demonstrate program accountability under CACFP performance standards outlined in 7 CFR 226.6(b)(1). [CACFP 12-2013]

- Require management plans as part of the CACFP application only if the organization intends to operate more than one facility. [CACFP 12-2013]

- Obtain only the information necessary to enable the State agency to assess an organization's viability to provide afterschool care meals. For example, although a budget is a necessary element of determining an organization's viability, the level of budgetary detail requested should be proportionate to the size and scope of the applicant. [CACFP 12-2013]

- Allow CACFP institutions that want to operate SFSP at the same sites where they provide afterschool care meals to follow the application requirements for experienced SFSP sponsors and sites. [7 CFR 225.6(c)(4)]

- Do not require further evidence of financial and administrative capability on SFSP applications from CACFP institutions in good standing. [7 CFR 225.6(e)(4)]

- Do not require organizations to include information that has already been provided in a CACFP application on an SFSP application, such as confirmation of area eligibility, the non-discrimination statement, health and safety inspections, and documentation of tax-exempt status. [CACFP 12-2013]

- Waive the requirement for conducting pre-approval visits of afterschool care centers that operated as SFSP sites. [CACFP 12-2013]

- Enter into a single permanent agreement with a program operator to approve its participation in both programs. [CACFP 03-2012, SFSP 05-2012]

Create a single application process to streamline participation:

A single SFSP and CACFP at-risk center application can eliminate duplication, make administration more cost-effective, and decrease paperwork burden. Here are options for State agencies to consider that build on the existing flexibilities (above) to simplify program operations. State agencies can use these options to create a single application process that will help experienced program operators transition seamlessly between CACFP and SFSP, with no break in service. A combined form also eliminates duplicate data fields and allows the State agency to review an application without cross-checking multiple documents.

- Gather the requirements for experienced SFSP and CACFP operators into a single application. The State agency could create a single, simplified application for program operators in good standing that includes the experienced SFSP sponsor requirements at 7 CFR 225.6(c)(3) and annual certification for renewing CACFP institutions under CACFP 19-2011.

- Shorten the application for participating program operators by only requesting information that is necessary to enable the State agency to assess the viability of the applicant or that is likely to change from year to year. It would be useful to review the application form to ensure that only the most essential information is collected. Extremely long applications have been cited as a burden and a barrier to participation.

- Automate the application process. While some States continue to rely on paper, FNS has seen more use of technology in recent years and supports those endeavors as a streamlining option.

- Streamline site application requirements. For example, summer meal sites that also provide afterschool care meals do not have to re-establish area eligibility (as long as it was based on school data obtained within the past 5 years) or repeat the health and safety inspection, if it is still current.

- Modify training requirements. Program operators providing afterschool meals are not required to attend training prior to submitting an SFSP application. State agencies that choose to include training as part of the application process could modify the scope of the training for experienced program operators. If a State agency provides training on the specific requirements of each program during the same session, there may be no need for program operators to attend separate trainings.

<u>Examine the application process to find additional opportunities for reducing paperwork for States and program operators</u>:

This guidance highlights multiple options that are available to help State agencies design an effective application process that will maintain integrity, while reducing paperwork. For State agencies beginning this effort, an assessment of current State policies to identify opportunities to streamline the application process may be a good starting point. If current State policies do not utilize existing flexibilities, State agencies can take the next step to identify actions that would streamline the application process.

Some States have already implemented streamlining efforts. For example, one State pre-populates data from the previous year's application. The State agency's system includes built in edit checks to identify the data fields that must be updated.

Another State uses documentation that has already been collected for participation in SFSP to shorten the CACFP application for SFSP sponsors. Instead of asking for duplicate information from an SFSP sponsor applying to serve CACFP afterschool care meals, the State agency requests only information that is not available from SFSP. The process is further streamlined for school sponsors that apply to participate in CACFP because they are not required to submit budgets or management plans.

Many of the options suggested in this guidance may also be useful in streamlining the application process in States where there are multiple Child Nutrition Program agencies. However, FNS recognizes that gaps in information collection and verification could arise in this unique circumstance. Engagement through memoranda of understanding, data sharing agreements, and routine communication among administering agencies could bridge these gaps, while supporting efforts to eliminate duplication and decrease paperwork burden. Cross-communication is essential for sharing documentation required by both programs, ensuring systems are compatible for simplifying the transfer of data, and coordinating program training and technical assistance opportunities.

FNS appreciates the exceptional effort of State agencies and local program operators working to meet the nutritional needs of children and young people in the Child Nutrition Programs. FNS is also interested in hearing how State agencies have streamlined the application process to remove barriers and encourage year-round participation, and is committed to uplifting those best practices in the form of further technical assistance and support. We encourage State agencies to

contact the appropriate FNS Regional Office to share experiences and best practices for streamlining the application process in CACFP and SFSP.

State agencies with questions concerning this guidance should contact the appropriate FNS Regional Office.

Original Signed

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Attachment

Appendix

<u>Existing Flexibilities</u>

Over the years, FNS has provided guidance on a number of options that are available to State agencies. Existing flexibilities in CACFP and SFSP regulations and policies establish a legal basis for State agencies to modify requirements, without compromising measures taken to preserve program integrity.

The following memoranda and regulations support streamlining efforts by offering options to State agencies that make it easier for organizations to participate in both programs:

- 7 CFR 225.6(c)(4) allows CACFP afterschool care centers to follow the application requirements outlined in 7 CFR 225.6(c)(3) for experienced SFSP sponsors.

- CACFP 15-2013: *Existing Flexibilities in the Child and Adult Care Food Program* reminds State agencies that annual certification replaces submission of a full renewal application, initial applications should only collect necessary information, and long applications are burdensome and a barrier to participation. Existing Flexibilities in CACFP | Food and Nutrition Service (usda.gov)

- CACFP 12-2013, SFSP 14-2013: *Transitioning from the Summer Food Service Program to Child and Adult Care Food Program At-Risk Afterschool Meals* addresses modification of requirements under 7 CFR 226.6(b)(1) and 226.6(f) regarding management plans, budgets, documentation of the delivery of benefits, documentation of meal service and other operational requirements, nondiscrimination statement and media release, confirmation of area eligibility, health and safety inspections, and documentation of tax-exempt status. Transitioning from SFSP to CACFP At-risk Afterschool Meals | Food and Nutrition Service (usda.gov)

- CACFP 03-2012, SFSP 05-2012: *Simplifying Application Procedures in the Summer Food Service Program* advises that afterschool care centers may serve summer meals to the same children they serve during the school year (7 CFR 225.6(c)(4)). Simplifying Application Procedures in the Summer Food Service Program | Food and Nutrition Service (usda.gov)

- 7 CFR 225.14(c)(1)(i) does not require CACFP institutions in good standing to submit a management plan as described under 7 CFR 225.6(e) or further demonstrate financial and administrative capability for SFSP operations unless the State agency has concerns about the financial or administrative capability of the institution.

- CACFP 19-2011: *Child Nutrition Reauthorization 2010: Child and Adult Care Food Program Applications* replaces submission of a renewal application with a simple annual certification to support that the information required under 7 CFR 226.6(b)(2) is current or updated with changes. CACFP Applications | Food and Nutrition Service (usda.gov)

- CACFP 11-2007: *Accommodations for Non-Traditional Program Operators* encourages State agency latitude with regard to application requirements and

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implementation of the regulations to the day-to-day operations of afterschool care centers. [Accommodations for Non-Traditional Program Operators | Food and Nutrition Service (usda.gov)](https://www.fns.usda.gov)