



National CACFP Forum  
2751 Buford Hwy NE, Ste 500  
Atlanta, GA 30324

CCFP Roundtable  
1000 N. Alameda St., Suite 240  
Los Angeles, CA 90012

May 15, 2020

Angela Kline and Andrea Farmer  
United States Department of Agriculture, Food & Nutrition Service  
1320 Braddock Place  
Alexandria, VA 22314

Dear USDA:

We greatly appreciate the significant effort the United States Department of Agriculture (USDA) has already undertaken to respond to the COVID-19 (coronavirus) pandemic through the issuance of several nationwide waivers and supporting Questions and Answers memos. On behalf of the CACFP community we sincerely commend the USDA staff for their diligence and determination to ensure that CACFP continues to support good health, food security, and safety for our nation's most vulnerable children in this unprecedented situation.

We ask that the USDA extend the COVID-19 waivers through September 30, 2020 to align with the continued stay-at-home orders and social distancing requirements in place across the nation. This extension will also ensure states, localities, and program participants the ability to plan for the summer and upcoming school year. Additionally, we request that USDA issue new guidance expanding the use of technology for program oversight and the scope of non-congregate meals to include non-enrolled children. Finally, we ask that USDA ensures state agencies do not add more restrictive or cumbersome requirements to the waivers implemented to support providers and sponsors during the pandemic.

Based on feedback from CACFP operators over the past month, we specifically seek extensions with the following:

- **Extensions for claim deadlines**

Previous guidance allowed for a 60-day extension for January and February 2020 claim information. Many facilities across the country were closed without prior notice in March and many have limited or no access to the paperwork needed to process March and April claims. Sponsors do not want to pressure site operators to defy state or city stay-at-home orders in order to access this paperwork, nor do we want to jeopardize anyone's health by requiring them to return to an office setting prior to receiving guidance from health officials in their communities. Once stay at home orders are lifted, providers will need time to submit the documentation and sponsoring organizations will need time to review and compile the paperwork before completing the required edit checks and submitting to state agencies for reimbursement. Additional 60-day extensions are needed for March, April and potentially May.

- **Non-congregate models of meal service, including delivery.**

As many summer programs are announcing delays or cancelations and social distancing restrictions remain in effect, a mix of congregate and non-congregate meal service models may be offered by CACFP providers in order to meet changing needs of their communities.

Further, non-congregate meals should be extended to non-enrolled children in the community and siblings of children enrolled in CACFP. While this population may be eligible for meals later in the year under the Summer Food Service Program, allowing current CACFP locations already in operation to provide emergency meals during this time would meet an immediate need for an underserved population. It is uncertain if many summer sites will be open and current non-congregate sites can accommodate the children in the nearby communities.

- **Meal service times, meal pattern, and at-risk afterschool activity requirement flexibilities.**

Program operators need these flexibilities to continue into the summer in order to meet the changing needs of their communities. Provide clarification that CACFP sites that do not typically operate on weekends can distribute and claim weekend meals. Allow At-Risk- sites to continue through the summer without transitioning to the Summer Food Service Program, as there is little time to train staff for the transition and many Health Departments are not conducting inspections, therefore would not be able to approve sites for the summer feeding programs.

In addition to the extensions outlined above, we request USDA issue new guidance supporting the following flexibilities for CACFP:

- **Expand the use of technology to allow desk audits to replace onsite monitoring visits**  
Waivers issued in March 2020 allowed CACFP sponsors to conduct two reviews of their CACFP facilities. Further, the waiver allowed sponsoring organizations to review new

CACFP facilities as a desk audit. Travel continues to subject staff to personal risk and requiring on-site reviews by CACFP sponsors and state agencies is inconsistent with the CDC and local public health mandates. While states and the federal government are slowly starting to allow businesses to reopen on a limited basis, social distancing guidelines by the CDC and enhanced licensing requirements limit the number of non-essential visitors to childcare and adult care facilities.

In addition to health and safety concerns, many organizations are experiencing a significant loss of revenue and must implement strict cost saving measures to remain operational. In order to maintain the highest level of integrity and ensure program compliance, onsite monitor visits should be replaced with desk audits utilizing technology such as Skype, Hangouts, Zoom, or WebEx.

- **Extend non-congregate models of meal service to non-enrolled children**

Non-congregate meals should be extended to non-enrolled children in the community and siblings of children enrolled in CACFP. While this population may be eligible for meals later in the year under the Summer Food Service Program, allowing current CACFP locations already in operation to provide emergency meals during this time would meet an immediate need for an underserved population. It is uncertain if many summer sites will be open and current non-congregate sites can accommodate the children in the nearby communities. This will accomplish four outcomes:

1. It will allow sponsors to serve greater numbers of children and adults in need and expand service areas into the community during a difficult time.
2. It will increase the overall reimbursement possibilities for sponsors, helping rebuild their financial stability.
3. It will help child and adult centers possibly gain more enrollments, helping restore their financial stability.
4. It creates a viable and optional transition solution while addressing a much-needed service gap for children and adults that need emergency meals.

Given the severity of the COVID-19 pandemic and the continued need to socially distance and follow stay-at-home measures, we request that you immediately extend the CACFP program waivers to September 30, 2020 and provide additional guidance on the use of technology in order to maintain program integrity. The extension of these waivers will provide much needed certainty for the state agencies and providers serving nutritious meals to our most vulnerable children and adults during this difficult time.

The National CACFP Forum and the CCFP Roundtable sincerely appreciate your consideration of the unique needs of CACFP as you work to craft the necessary federal response to the coronavirus pandemic. If you have any questions, please contact Reynaldo Green ([Reynaldo.Green@qccga.org](mailto:Reynaldo.Green@qccga.org)), Jodi Kuhn ([jkuhn@gmail.com](mailto:jkuhn@gmail.com)), or Elyse Homel Vitale ([elyse@ccfprounhtable.org](mailto:elyse@ccfprounhtable.org)). We stand ready to work with you to address both the health and economic impacts of this disease.

Sincerely,

A handwritten signature in black ink, appearing to read "Reynaldo Green". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Reynaldo Green  
President, National CACFP Forum

A handwritten signature in black ink, appearing to read "Elyse Homel Vitale". The signature is cursive and somewhat compact, with a distinct loop at the end.

Elyse Homel Vitale, MPH  
Executive Director, CCFP Roundtable