

Q & A SESSION - MEAL BENEFIT INCOME ELIGIBILITY FORM

The 2017 Meal Benefit Income Eligibility Form shall not be distributed any earlier than June 1st and may be used with the 2017 Claiming Percentage Rosters beginning July 1st. Remember, the Child and Adult Care Food Program Meal Benefit Income Eligibility Letter (Child Care) FY 2017 must also be distributed with each Meal Benefit Income Eligibility Form.

Q 1: In regards to income eligibility for families, should they include overtime into their gross income?

- A. Yes, but only if the overtime is consistent. See #9 in the Child and Adult Care Food Program Meal Benefit Income Eligibility Letter (Child Care) FY 2017.

Q 2: What should be listed in the boxes for grade if the children are not yet enrolled in a grade school?

- A. Parents and guardians are only required to enter a grade for school age children and may leave it blank or indicate N/A (not applicable) if any of the children are not enrolled in school.

Q 3: If the applicant has a SNAP, TANF, or FDPIR case number, is that person required to document the last four digits of the Social Security number?

- A. As indicated in Step 2 B) of the Instructions for Completing the CACFP Meal Benefit Income Eligibility Application: If anyone in your household participates in any of the above listed programs: Write a case number for SNAP, TANF, or FDPIR, **then go to STEP 4**. Therefore, the last four digits of the SS# are not required and may be left blank, if the applicant provided a valid case number.

Q 4: If the applicant has a case number is the person required to list the total household members in Step 3?

- A. As indicated in Step 2 B) of the Instructions for Completing the CACFP Meal Benefit Income Eligibility Application: If anyone in your household participates in any of the above listed programs: Write a case number for SNAP, TANF, or FDPIR, **then go to STEP 4**. Therefore, the total household members are not required, if the applicant listed a valid case number.

Q 5: Step 4 on the Meal Benefit form says that the phone number and email are optional. This was always required before. Can parents leave it blank?

- A. ADE prefers to have one or the other because this information is necessary when ADE wishes to conduct parental contacts. Next year the form will be updated indicating phone numbers and emails as required fields. If the applicant leaves these fields blank this year, ADE will not disallow it.

RESOURCES:

2017 Meal Benefit Income Eligibility Form

<http://www.azed.gov/health-nutrition/files/2016/05/2017-mbie-centers-application.pdf>

2017 Claiming Percentage Rosters

<http://www.azed.gov/health-nutrition/files/2011/06/claiming-roster.pdf>

Child and Adult Care Food Program Meal Benefit Income Eligibility Letter (Child Care) FY17

<http://www.azed.gov/health-nutrition/files/2016/05/2017-mbie-centers-parent-letter.pdf>

Q & A SESSION - PROCUREMENT AND CIVIL RIGHTS

Q 1: Please expand on micro purchase vs. small purchase. Our company is a large corporation and we have credit accounts with Wal-Mart. We only purchase approximately \$100-\$150 per week on food. Since we must “share the wealth,” must we utilize other stores besides Wal-Mart and Sam’s?

Q 2: For small purchases when comparing prices do we have to compare every item or can we do a sample size? If so, how big should it be?

Q 3: Do we need to collect quotes every month on every item or can we do it annually and keep it on file?

Note answers below for all 3-Questions:

Micro purchase (\$0 through \$3,999) For micro purchases, you’ll need to be able to answer these three questions:

1. Do you consider the price of your products or services to be reasonable?
2. Are the products and services (similar or dissimilar purchased at once as a single, collective unit) whose aggregate cost is less than \$3,999 in a single transaction?
3. Has competition been achieved by distributing purchase transactions equitably among qualified sources?

If you are able to answer yes to all three questions; you may conduct your micro-purchases without soliciting any competitive quotations. However, if you cannot answer yes to all three questions; you may need to ask for more information to make a determination. For instance, how many qualified sources (stores) do you have access to? And what is the distance of other qualified sources?

If you are having a hard time answering yes to all three questions, you might want to consider using the small purchase procedures instead.

Small purchase procedures (below \$150,000) are those relatively simple and informal procurement methods that are sound and appropriate for the procurement of services, supplies or other property, costing in the aggregate not more than \$150,000. For small purchases price or rate quotations **must be obtained** from an adequate number of qualified sources.

Now, let's say that I currently purchase canned and frozen goods which are delivered to my facility on a weekly basis. On average the cost of the food is \$600 per week. But, I can't really say that competition has been achieved by distributing purchase transactions equitably among qualified sources, because in the past I have only been using one source. I'm not even sure who or many contractors deliver in my area. So I've decided to follow my small purchase procedures to obtain price or rate quotations from an adequate number of qualified sources.

I was able to contact three companies that will deliver to my location. The first internet company can deliver to me within 24 hours of ordering and they will deliver weekly. But their quote is \$230 more per week, and \$830 payment is due at delivery. The quote from the second company is the same price that I have been paying, \$600; but they will only deliver once a month and will send a monthly invoice which is due by the 5th of each month. The quote from the third company is \$600 per week, they will deliver weekly, and they will send a monthly invoice which is due the 10th of each month.

Results - Three contractors were solicited for competitive quotations and my cost analysis determines that the third company is the only responsible contractor possessing the ability to perform successfully under the terms and conditions of my proposed procurement, at the best reasonable price.

Process Each organization needs to develop a procurement policy and procedure. The policy should address when each type of procurement methods will be enacted, who is responsible for ensuring the methodology is followed and how often the testing will occur for micro purchases and small purchases. **Documentation** is required containing sufficient detail of my history of procurement for the purchases that will be made from this contractor for the fiscal year. The records should at least include;

The rationale for the method of procurement = rotating micro-purchases is not a realistic option due to limitations on the number of contractors that will deliver.

The selection of contract type = small purchase.

Contractor selection or rejection = #1 rejected because cost is not reasonable, and #2 rejected because there is not enough storage at the facility for just 1 monthly delivery.

The basis for the contract price = #3 has the best competitive pricing and meets the conditions required for the proposed small purchase procurement.

Q 4: If we live in a very rural area with limited resources is it okay to always buy the micro items at the same store, since it's our only store?

- A.** In some instances there may not be any other option. If you find the prices at the store are reasonable and you have tried contacting qualified sources for a delivery service and have found delivery is not available, or reasonable, there is no other choice; the store in your area is the only resource available to you. You would need to document those facts annually and have all attempts available for review.

RESOURCES:

USDA Policy Memo CACFP 02-2016

<http://www.azed.gov/health-nutrition/files/2015/11/sp02-cacfp-02-sfsp-02-2016.pdf>

2 CFR 200.320(a)

http://www.ecfr.gov/cgi-bin/text-idx?SID=5e4b6290a893464fab2664955c45b170&mc=true&node=se2.1.200_1320&rgn=div8

2 CFR 200.318

http://www.ecfr.gov/cgi-bin/text-idx?SID=f913880dbbaa49dcc38177bd13f934a2&mc=true&node=sg2.1.200_1316.sg3&rgn=div7

7 CFR 226.22

http://www.ecfr.gov/cgi-bin/text-idx?node=pt7.4.226&rgn=div5#se7.4.226_122

7 CFR 226.22 (i)(4)(i)

<http://www.fns.usda.gov/sites/default/files/CFR226.pdf>

Q 5: My non-profit has two credit cards we can use. One is for Fry's and the other one is from Sam's Club. We also have an online contract with Staples for office supplies. This is as much we can spread the wealth. My non-profit is not going to get more credit cards just so we can purchase from other stores. We are not given cash to purchase supplies. How are we supposed to meet these new requirements?

- A.** ADE suggests that you contact the responsible principals or responsible individuals for guidance. This may be the owner, executive director or board member. The requirements in 2 CFR 200 affect all organizations receiving a federal award. They should be able to provide you with your organizational procurement policies and procedures and proper guidance to comply with 2 CFR 200.318.

2 CFR 200.318 is in the Standards for Financial and Program Management from the Office of Management and Budget Guidance for Grants and Agreements which contains the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

Q 6: Do we need to provide all forms in all available languages or just the main ones?

- A.** You must be able to provide services to Limited English Proficiency (LEP) potentially eligible persons, applicants, and participants for access to federally assisted programs and activities. Four factors to be considered in determining the need for providing services in another language are (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the program or grantee; (2) the frequency with which LEP individuals come in contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the grant/recipient and costs.

For assistance in determining the extent of your obligation to provide LEP services, see FNS Instruction 113-1 VII and lep.gov.

RESOURCES:

<http://www.fns.usda.gov/sites/default/files/113-1.pdf>

<https://www.lep.gov/>

Q & A SESSION – MEAL SERVICE AND MEAL PATTERN

Q 1: If a child sits down for a meal and the parent picks him up four minutes after he is served can we claim that meal? We were just told service, not consumption; but we have also been told fifteen minutes to claim the meal.

- A.** Once the child is seated at the time of meal service, they must be given an opportunity to consume or decline the meal. In this case it is the parent that has chosen to decline the meal. The child was not even provided an opportunity to consume the meal. So, it should not be claimed.

However, the center should have a written policy addressing how much time it typically takes for a child to consume each type of meal. Once this policy is in place it should be adhered to by all staff when determining whether the child has had enough time to consume a claimable meal.

Review Part 226 for additional guidance on Operational Provisions.

Q 2: Army regulations allow breastmilk to children up to two years old without having a note from their doctor. Will CACFP allow this to be creditable and claimable even though we are supposed to transition infants to whole milk at 12 month?

- A.** Yes, see Chapter 3, page 16 in the Feeding Infants Guide. Breastmilk is a substitute for cow's milk in the meal pattern for children.

Q 3: Regarding milk for two year olds; are they supposed to be served low-fat or fat-free, or is 2% acceptable?

- A. Once a child turns two years old, the requirement is that the child receives 1% (low-fat) or fat free (skim) milk. Reduced fat milk, also known as 2%, is not creditable.

Q 4: If we purchase soy or lactose free milk can we claim it?

- A. Yes, if the soy beverage you are purchasing is nutritionally equivalent to milk, you may claim it on your food costs. Please follow up with your specialist if you have any questions regarding soy beverages being nutritionally equivalent to milk. Lactose free milk is nutritionally equivalent to milk, therefore, it may be claimed.

Q 5: For infants; does a child need to have all components in order to count the meal for reimbursement?

- A. Yes, the infant must be offered the required components for the specified age group in order to claim the meal. Note that once a child starts consuming the required components, the infant must be offered these components from that point on.

Q 6: For infants, is there a timeframe to claim the meal, as they are fed on demand?

- A. Infants are to be fed on demand. However, it should be based on the closest typical meal service time and your center should develop a written policy for reasonable infant meal times. For example, an infant in care from 8:00 AM to 12 Noon might consume Breakfast, AM Snack, and Lunch during that time period, but you cannot claim lunch, PM Snack and Supper, just because the reimbursement would be higher for two meals. You should be claiming meals that are closest to the typical meal service time.

Q 7: Do production records need to be created for snacks?

- A. Yes, if you are required to maintain production worksheets they are required for each meal that you prepare and serve.

RESOURCES:

<http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=478ea94d82e457d01cd9388a2f54ae87&mc=true&n=pt7.4.226&r=PART&ty=HTML>.

<http://www.fns.usda.gov/tn/feeding-infants-guide-use-child-nutrition-programs>.

This institution is an equal opportunity provider.