

AUGUST 23, 1999

SUBJECT: Guidance on Training for Sponsored Facilities in the
Child and Adult Care Food Program (CACFP)

TO: Regional Directors
Special Nutrition Programs
All Regions

We are writing to stress the importance of training day care providers and center personnel. Insuring that program participants are well-trained is a vital responsibility of State agencies and sponsoring organizations, and it is an important proactive tool in improving program management and integrity. Unfortunately, the Office of Inspector General found during its recent audit, "Operation Kiddie Care" that States and sponsoring organizations are not uniformly monitoring or enforcing CACFP regulatory training requirements.

It may be helpful to briefly review the training requirements in the CACFP regulations. First, institutions (sponsoring organizations and independent child care centers) must keep records that document the date, location, topics covered, and attendees for each training session conducted (Section 226.15(e)(11)). Second, sponsoring organizations must train child and adult care facilities prior to participation in the program and at least annually thereafter (Section 226.16(d)(2) and (3)).

Although current regulatory language does not specifically require attendance by facilities at training sessions, we intend to propose new rules that will require that all day care home providers and key staff from sponsored child and adult care centers attend training before they begin participation in the program and afterward on an annual basis. Until these changes can be made to the regulations, **State agencies and sponsors can and should require attendance**. Therefore, **we strongly encourage State agencies and sponsors to review their training requirements and require attendance by facilities**. There are many State agencies that do require attendance of training, and we support these efforts.

As State agencies review their current training requirements, we encourage them to consult the FNS Management Improvement Guidance handbooks for family day care homes and day care centers that were developed in cooperation with State administrators. These handbooks contain standards that can be used by State agencies and sponsors to measure the proficiency of facility staff in conducting their CACFP (and broader child care) responsibilities. Sponsors can also use these handbooks to train facility staff in areas in which monitoring visits have revealed deficiencies. The handbooks establish three standards for facility staff:

- comply with CACFP administrative requirements;
- comply with CACFP meal service requirements and serve nutritious meals;
and
- promote the health, safety and well-being of the children in care.

Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

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We will be addressing how States can strengthen their training in one of the modules that will be presented in the nationwide CACFP Management Improvement Training sessions that will be conducted between October 1999 and January 2000. Training will also be an important topic at the National CACFP Conference, to be held in March 2000 in Chicago, Illinois. We will be working with the National Association of CACFP Professionals to modify the training modules for presentation to sponsors.

/ORIGINAL SIGNED/

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