

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



TO: Child and Adult Care Food Program (CACFP) **For-profit Institutions**

FROM: John D. Frassinelli, Division Director

School Health, Nutrition, Family Services and Adult Education

DATE: February 1, 2022

SUBJECT: Operational Memorandum No. 1P-22

Audit Requirements for For-profit Subrecipients

The Connecticut State Department of Education (CSDE) is required to institute audit procedures applicable to for-profit subrecipients participating in the Child and Adult Care Food Program (CACFP). Each state agency has the authority to establish audit policy for for-profit child care institutions and for-profit adult day care (Title XIX) institutions regarding the receipt of federal funds. The CSDE's audit policies and procedures for all for-profit institutions participating in the CACFP are below.

Single Audit (e.g., Organization-wide Audit) Required

For-profit institutions that expend \$750,000 or more of total federal awards in a year are required to have an annual organization-wide audit performed. The audit must comply with the provisions of the Federal Office of Management and Budget (OMB) Uniform Grant Guidance, 2 CFR Part 200 Subpart F and the applicable Compliance Supplement in 2 CFR Part 200, Appendix XI (revised July 2021) to be used in conjunction with that audit. A copy of the organization-wide audit report must be submitted to the CSDE's Child Nutrition Unit within six months from the end of the institution's fiscal year.

Please also note the information below.

- Federal funds include CACFP and cash-in-lieu reimbursements, as well as all other federal funds expended by the institution.
- The cost of the audit is an allowable cost to the CACFP. Institutions that are required to have an organization-wide audit performed can, with prior state agency approval, amend their approved CACFP budgets to include the prorated cost of conducting the audit.
- Coronavirus Aid, Relief and Economic Security Act (CARES Act) and Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA Act): The CARES Act was passed in March 2020 to provide direct economic assistance in response to COVID-19. The Act created an Educational Stabilization Fund to support K-12 schools,

colleges, and universities during the COVID-19 national emergency. The CSDE is the Connecticut state agency charged with implementing programs under the CARES act that supported elementary and secondary education. The CRRSA Act was signed into law on December 27, 2020, and provided additional funding for the Elementary and Secondary School Emergency Relief Fund (ESSER II Fund). The major program areas receiving CARES Act and CRSSA Act funds include the Elementary and Secondary School Education Relief Fund (ESSER & ESSER II) and Child Nutrition Grants.

• American Rescue Plan Act (ARP Act): The ARP was passed in March 2021 to provide additional relief to address the continued impact of COVID-19. Assistance measures included funding for the ARP Elementary and Secondary School Emergency Relief (ARP ESSER) Fund. ARP ESSER funds were provided to state educational agencies and school districts to help safely reopen and sustain the safe operation of schools and address the impact of the coronavirus pandemic on the Nation's students. The major program area receiving APR Act is ARP Summer Enrichment Grants.

Please note that Appendix VII of the Compliance Supplement in 2 CFR Part 200 (revised July 2021) contains importation information regarding CARES Act, CRSSA Act, and ARP Act compliance, reporting, and auditing requirements.

Audit Exemption

For-profit institutions that expend total federal awards of **less than \$750,000** in a year are exempt from audit requirements for that year, but **must still complete and return the attached** *Notice of Audit Exemption* **form to the Child Nutrition Unit no later than March 31, 2022.** In addition, records must be available for review or audit by appropriate officials of the federal agency, the CSDE or other pass-through agency, and the Government Accountability Office.

State agencies are required to take immediate corrective action when CACFP institutions do not comply with the audit requirements. Failure to submit the required organization-wide audit or the *Notice of Audit Exemption* form may result in the CSDE declaring the institution seriously deficient in the operation of the CACFP.

Questions may be directed to Susan Boyle at susan.boyle@ct.gov or 860-807-2074.

JDF:shb Enclosure

Important: This is a numbered Connecticut State Department of Education (CSDE) operational memorandum that contains important program information. Please read carefully and retain for future reference. All CSDE operational memoranda are posted on the CSDE's Operational Memoranda for the CACFP webpage..

Notice of Audit Exemption

For-profit Child Care and For-Profit Adult Day Care (Title XIX) Child and Adult Care Food Program (CACFP) Institutions

Instructions: Complete all information below. Scan this form and related audit reports. E-mail all information to Susan Boyle at susan.boyle@ct.gov by March 31, 2022.

Name of institution:	
☐ July 1, 2020 – June 30, 2021	
October 1, 2020 – September 30,	2021
☐ January 1, 2021 – December 31, 2	2021
Other (indicate):	through
Total amount of federal awards expend cycle covered by this report (approximate	
Check one box only:	
\$750,000 for the fiscal year indicated annual organization-wide audit per Uniform Grant Guidance, 2 CFR Par Supplement in 2 CFR Part 200, Appe with that audit. However, all records	tution has expended total federal awards of less than above, and therefore is not required to have an formed in accordance with the provisions of the t 200 Subpart F and the applicable Compliance and the applicable Compliance and the available for review or audit by appropriate SDE, or other pass-through agency, and the
\$750,000 or more of total federal awa	dit) required: This CACFP institution has expended ards for the fiscal year indicated above, and therefore, ganization-wide audit within six months from the end
Signature of Authorized Representative (Signature #1 ED-099)	Date