

STATE OF CONNECTICUT DEPARTMENT OF EDUCATION



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

FROM: John D. Frassinelli, Division Director

School Health, Nutrition and Family Services

DATE: February 15, 2023

SUBJECT: Operational Memorandum No. 1P-23

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 April 2022) 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 following the end of the institution's fiscal year.

Please also note the information below.

- Federal funds include CACFP meals and cash-in-lieu reimbursements, additional funding received from the CSDE under the CACFP Emergency Operating Costs (EOC) Reimbursement Program in October 2021, and all other federal funds received and subsequently expended by the institution.
- The cost of the audit is an allowable cost to the CACFP. With prior state agency
 approval, institutions that are required to have an organization-wide audit performed can
 amend their approved CACFP budgets to include the prorated cost of conducting the
 audit.

• Important Notes Regarding COVID-19 Grant Funding: The CSDE is the Connecticut state agency charged with implementing programs under the Coronavirus Aid, Relief and Economic Security Act (CARES Act), the Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA Act), the American Rescue Plan Act (ARP Act), and the Coronavirus State and Local Fiscal Recovery Fund (CSLFRF) to support elementary and secondary education. The Education Stabilization Fund (ESF) was established, with the passing of the CARES Act in March 2020, to provide direct economic assistance to K-12 schools. The CRRSA Act and ARP Act were passed in December 2020 and March 2021, respectively, to address the continued impact of COVID-19 through additional funding to the ESF. The CSLFRF was authorized by Sections 602 and 603 of the Social Security Act to provide direct payments in response to the negative economic and fiscal impacts of COVID-19.

Please note that Appendix VII of the Compliance Supplement in 2 CFR Part 200, Appendix XI (revised April 2022) contains important information regarding COVID-19 grant 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.

The CSDE is 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.

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, 2023.

Name of institution:	
☐ July 1, 2021 – June 30, 2022	
October 1, 2021 – September 3	0, 2022
☐ January 1, 2022 – December 31	, 2022
Other (indicate):	through
Total amount of federal awards expensively cycle covered by this report (approximately check one box only:	
\$750,000 for the fiscal year indicat annual organization-wide audit property Uniform Grant Guidance, 2 CFR Property Supplement in 2 CFR Part 200, Appropriate to the conjunction with that audit. However, and the state of the conjunction of the fiscal year indicates annual organization.	estitution has expended total federal awards of less than ted above, and therefore is not required to have an performed in accordance with the provisions of the Part 200 Subpart F and the applicable Compliance opendix XI (revised April 2022) to be used in eyer, all records must and will be available for review or the federal agency, the CSDE, or other pass-through untability Office.
\$750,000 or more of total federal a	audit) required: This CACFP institution has expended awards for the fiscal year indicated above and will mual organization-wide audit within six months 's fiscal year.
Signature of Authorized Representative (Signature #1 on ED-099)	Date