



**North Carolina Department of Health and Human Services  
Division of Public Health – Women’s & Children’s Health Section**

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Michael F. Easley, Governor

Carmen Hooker Odom, Secretary

**January 2, 2003**

**CACFP 03-01**

**MEMORANDUM**

**To: Institutions Participating in the Child and Adult Care Food Program  
Sponsors of the Summer Food Service Program**

**From: Arnette Cowan, MS, RD, LDN  
Head, Special Nutrition Programs**

**Subject: Certification Requirements for Child Nutrition Programs (Policy No. 226.06.32)**

Please note the attached reference chart for certification requirements on drug-free workplace, debarment/ suspension and lobbying in any Child Nutrition Program. The chart should help distinguish the differences in requirements for grant agreements, subgrant agreements and procurement contracts.

It should be noted on the chart that for Food and Nutrition Service Programs, the debarment/ suspension certification is not required for a primary grantee or subgrantee of a statutory entitlement or mandatory award. For example, the certification would not be required for subgrant agreements between a State agency and a school food authority, Child and Adult Care Food Program Institution or Summer Food Service Program sponsor. However, certifications must be obtained for procurement contracts, as applicable, based on the amount of the contract.

When utilizing this chart, please remember that this information was current on the date of distribution. Future changes to these regulations may result in different certification requirements.

If you have any questions, please call your regional consultant.

c: SNPStaff



## Departmental Regulation Certification Requirements Child Nutrition Programs

yes = required no = not required	<u>Drug-Free Workplace</u> 7 CFR Part 3017, Subpart F	<u>Debarment/ Suspension</u> 7 CFR Part 3017, Subparts A-E	<u>Lobbying</u> 7 CFR Part 3018
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### GRANT AGREEMENTS

#### FNS — Primary Grantee

• FNS — State Agency (SA)	yes <sup>1</sup>	no	=\$100,000 - no >\$100,000- yes
• FNS — SFA (ROAP) • FNS — CACFP Institution (ROAP) • FNS — SFSP Sponsor (ROAP)	yes	no	=\$100,000 - no >\$100,000 -yes

### SUBGRANT AGREEMENTS

#### Primary Grantee — Subgrantee

• SA — SFA • SA — CACFP Institution • SA — SFSP Sponsor	no	no	=\$100,000 - no >\$100,000- yes
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### PROCUREMENT CONTRACTS

#### Primary Grantee — Contractor

• SA — Contractor	no	<\$100,000 - no <sup>2</sup> =\$100,000 -yes	=\$100,000 - no >\$100,000 -yes
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#### Subgrantee — Contractor

• SFA — Contractor (e.g., FSMC, vendor) • CACFP Institution — Contractor (e.g., vendor) — SFSP Sponsor Contractor (e.g., FSMC, vendor)	no	<\$100,000 -no <sup>2</sup> =\$100,000- yes	=\$100,000 - no >\$100,000 -yes
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#### Contractor — Subcontractor

	no	<\$100,000 - no <sup>2</sup> =\$100,000- yes <sup>3</sup>	=\$100,000 - no >\$100,000- yes
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<sup>1</sup> A State may make a single certification each fiscal year covering all Federal grants to all of its agencies.

<sup>2</sup> Certifications required for all contracts with A-133 auditors regardless of the amount of the contract.

<sup>3</sup> No certification required for procurement contracts between a subcontractor and another party regardless of the amount.