



DATE: February 11, 2026

SUBJECT: Promoting Stronger Program Integrity and Oversight in the Child and Adult Care Food Program (CACFP)

TO: Regional Directors, Child Nutrition Programs, All Regions

State Directors, Child Nutrition Programs, All States

Dear State Directors,

In her first week at the U.S. Department of Agriculture (USDA), Secretary Brooke Rollins sent each of you a letter highlighting her priorities for the nutrition programs. In this letter, she noted her commitment to taking swift action to minimize instances of fraud, waste, and program abuse and encouraged States to choose policy options that protect both participants and the taxpayer. Under her leadership, and to fulfill that commitment, the Food and Nutrition Service (FNS) seeks your partnership in strengthening program integrity.

It is critically important for USDA's nutrition assistance programs to serve American taxpayers as efficiently as possible. In the Child and Adult Care Food Program (CACFP), program integrity efforts ensure resources are invested wisely to maximize the benefit for eligible children and adults who receive care at participating child care centers, day care homes, and adult day care centers. Recent high-profile fraud cases have demonstrated the urgent need for stronger safeguards to restore and maintain public confidence in these programs. Although most program operators seek to comply

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with program rules in good faith, fraud—even when infrequent —undermines public confidence in government programs and jeopardizes their ability to serve the individuals who are in greatest need of assistance. Accordingly, FNS is committed to supporting State agency efforts to combat fraud, waste, and abuse. State agencies should make every effort to increase oversight of the CACFP through the strategies outlined below.

**Use the onboarding process to help prevent bad actors from participating in**

**CACFP.** The onboarding process, along with routine renewing institution assessment, is the first line of defense in preventing bad actors from becoming participating institutions in the Program. In addition to current business integrity efforts, FNS encourages State agencies to:

- Complete background checks on new institutions' principals for a more thorough review of their business history and standing. Deny an institution's application if that institution's principals received a conviction or civil judgment that indicates a lack of business integrity in the last seven years<sup>1</sup>.
- Regularly reassess and revalidate an institution's information included on the application using the most up-to-date approval criteria. Terminate agreements that fail to meet the criteria<sup>2</sup>.

**Training is a critical component of program integrity.** To ensure institutions understand Program requirements and potential consequences of noncompliance, State agencies should prioritize sponsor training. FNS is committed to issuing a series of

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<sup>1</sup> 7 CFR 226.6(b)(1)(xiv)(A)

<sup>2</sup> 7 CFR 226.6(c)(2)(i)

webinars and tipsheets containing resources to aid State agencies in identifying and handling serious deficiencies. Additionally, FNS encourages State agencies to:

- Review training schedules and materials to ensure timely, thorough, and effective training to all institutions.
- Train sponsoring organizations throughout the fiscal year. While State agencies have historically conducted trainings at or around the beginning of the fiscal year, this can lead to both inefficiencies and knowledge gaps as many sponsoring organizations experience a high level of staff turnover.

**Monitoring, investigation, and corrective action are crucial for managing**

**institutions.** State agency oversight efforts remain critical for ensuring compliance with Program requirements. Routine monitoring helps State agencies identify the types and levels of abuse and errors across institutions and quickly respond by taking corrective actions, as appropriate. State agencies are required to monitor CACFP institutions at least once every three years<sup>3</sup> and more frequently for high-risk institutions. State agencies must ensure that high-risk sponsoring organizations are prioritized for reviews. In addition, FNS recommends State agencies:

- Reassess methods for monitoring and investigations, including high-risk indicators, with a goal of surpassing the minimum.
- Ensure that written monitoring policies are up to date. This includes reviewing the criteria for monitoring sponsoring organizations for compliance, the criteria for determining which sponsoring organizations and independent centers will receive routine monitoring, and the procedures for routine monitoring visits.

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<sup>3</sup> [7 CFR 226.6\(m\)\(6\)](#)

**States must use the serious deficiency and suspension process as required.** It is the responsibility of the State agency to ensure sponsoring organizations are fulfilling their administrative responsibilities and maintaining records relating to the payment, review, and training of facilities under their sponsorship. FNS reminds State agencies of the following:

- State agencies must declare an institution seriously deficient if the State finds serious Program violations or issues of noncompliance at any time during the institution's participation in CACFP<sup>4</sup>. Use of the Serious Deficiency process is not optional.
- If the serious deficiencies involve the submission of a false or fraudulent claim for reimbursement, the State agency must use the steps outlined in regulations<sup>5</sup> to swiftly remove fraudulent sponsoring organizations from the Program.

**Carefully review reimbursement claims for signs of program abuse.** State agencies must subject all reimbursement claims to a minimum set of edit checks<sup>6</sup> to guard against fraud. These include basic checks to ensure sponsoring organizations only claim reimbursement for approved meal types, and that meal claims do not exceed a maximum based on enrollment and operating days. FNS encourages State agencies to monitor claims for other early warning signs indicating mismanagement or possible abuse. These can include:

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<sup>4</sup> [7 CFR 226.6\(c\)\(3\)\(ii\)](#)

<sup>5</sup> [7 CFR 226.6\(c\)\(3\)\(iii\)](#)

<sup>6</sup> [7 CFR 226.7\(k\)](#)

- Monitoring growth over time. State agencies should be sensitive to any sudden increase in meal claims, or sustained growth over a longer period, that is inconsistent with growth observed in other sponsoring organization's claims.
- Comparing meal claims to other data for plausibility. State agencies should flag for follow-up review any claims that appear disproportionate to known sources of demand for child care services. This may include nearby school enrollment data or historic meal claims for the local area in question.

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Thank you for your partnership and shared commitment to supporting robust program integrity efforts throughout the CACFP. By enhancing State agency oversight efforts throughout the process – from onboarding to monitoring and investigations – you are fulfilling an essential role to safeguard the integrity of the Program, maximize the impact of taxpayer dollars, and protecting the CACFP for participants.

Please reach out to your FNS Regional Office with any questions regarding this letter or if you would like additional technical assistance.

Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should direct questions to the appropriate FNS Regional Office.

**JESSICA SARACINO** Digitally signed by JESSICA SARACINO  
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