



CACFP Claims Validation Project Report

Strengthening Oversight and Operational Integrity

Fiscal Year 2026

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Maintaining the integrity of the Child and Adult Care Food Program (CACFP) is essential to ensuring that Federal resources support eligible participants and that public trust in the program remains strong. Recent high-profile fraud cases involving both State agencies and program operators and intentional misuse of Federal funds highlight the urgent need for stronger safeguards to restore and maintain public trust in the CACFP. While many State agencies and program operators strive to follow program requirements, even isolated instances of fraud, misuse, or intentional noncompliance can undermine public trust, divert resources away from participants, and jeopardize the long-term stability of the program. Safeguarding CACFP from fraud, waste, and abuse is a responsibility shared by every entity involved in its administration.

To strengthen program integrity and ensure that Federal funds are used correctly, the United States Department of Agriculture (USDA) Food and Nutrition Administration (FNA) conducted the CACFP Claims Validation Project in the spring of 2026. This first-of-its-kind initiative combined off-site reviews of administrative records with on-site meal service observations to verify the accuracy of meal claims and identify vulnerabilities that increase the risk of fraud, waste, or abuse. Through this effort, USDA aimed to identify irregularities, address vulnerabilities, and reinforce the systems needed to prevent misuse of program funds. The results of this project will be used to inform future rule-making and policy guidance.

What We Did

FNA conducted 811 off-site and 179 on-site claims validation reviews of CACFP institutions across ten states: California, Colorado, Florida, Illinois, Minnesota, Missouri, New Jersey, New York, Ohio, and Washington. The ten states were determined through

a retrospective review of available reporting, data, and other open-source information to assess potential fraudulent activities and showcase states that have best practices.

Review activities involved validating facility-level claims documentation, assessing operations and meal counting practices, and meeting with State agencies to discuss oversight responsibilities.

Using detailed facility-level claims data, USDA identified risk indicators – including block¹, attendance-based claiming, and other anomalies to select a targeted sample of sites for further documentation review or onsite validation.

What We Found

The project identified several systematic challenges and integrity concerns that State agencies and program operators should prioritize in their oversight and corrective action work.

Data-Driven Integrity Risks

Potentially improper or suspicious claiming patterns were found in nearly every participating State. While these cases were limited in number, they were concentrated among specific institutions, suggesting that targeted, data-driven monitoring is essential for detecting irregularities early.

Common Review Concerns

- **Meal count variance:** Reliance on attendance or estimates instead of point-of-service counts significantly increases the risk of inflated or inaccurate claims.
- **Recordkeeping deficiencies:** Missing, incomplete, or inconsistent documentation limits the ability to verify claims and creates opportunities for misuse.

¹ Block claiming is the practice of claiming for reimbursement a consistent or identical amount of meals per meal or day across an extended timeframe, without regard to actual daily attendance or meals served.

- **Meal Pattern and Service noncompliance:** Missing components, improper quantities, and meals served outside approved times signal both compliance issues and heightened fraud risk.
- **Integrity warning signs:** Prefilled records, identical counts across days or meal types, and meal counts exceeding attendance are red flags that warrant immediate follow-up.
- **Operational and oversight gaps:** Insufficient staff training, weak internal controls, and lack of understanding of CACFP rules increase vulnerability to both intentional and unintentional noncompliance.

Two cases—one in Ohio and one in New Jersey—raised significant concerns about the validity of program participation. In both instances, reviewers were unable to confirm operations due to the absence of staff/participants or refusal of entry. These cases highlight the ongoing risk of fraudulent participation and reinforce the need for vigilant oversight and swift State-level follow-up when sites cannot be validated.

Best Practices Observed

Many institutions demonstrated practices that support high integrity and strong operational performance. State agencies and sponsors may consider promoting these strategies as models:

- Accessible, well-organized documentation systems, including electronic records for attendance and meal counts.
- Consistent point of service counting procedures aligned with CACFP requirements.
- High-quality, transparent meal service practices, including family style meals and scratch preparation.
- Clean, sanitary, and well-maintained kitchens and food service areas.
- Engaged leadership and staff who demonstrate understanding of CACFP requirements and a commitment to accurate reporting.

What Happens Next

FNA will use the results of this project to strengthen guidance, clarify policy expectations, and inform rulemaking aimed at improving program integrity. State agencies will receive additional communication regarding recommended corrective actions for noncompliance issues identified during the reviews.

Moving forward, State agencies and operators should prioritize:

- Strengthening internal controls to prevent improper claims.
- Using data analytics and available systems to detect anomalies in real time.
- Ensuring staff at all levels receive consistent, ongoing training in CACFP requirements.
- Following up promptly and decisively when operational questions or integrity concerns arise.
- Applying corrective action and enforcement measures when required to address noncompliance.

Protecting CACFP from fraud, waste, and abuse is a shared responsibility and a critical component of ensuring the program remains reliable, credible, and capable of serving children and adults who depend on it. FNA looks forward to continued partnership with State agencies and program operators in building strong, accountable, and integrity-driven program operations nationwide.