

# CACFP Contractors on the National Disqualified List Policy

**To:** Child and Adult Care Food Program (CACFP) Child Nutrition Program Sponsors

**From:** Brigitte Hires, Administrator, Office of Nutrition

**Date:** January 30, 2026

**Re:** CACFP Contractors on the National Disqualified List (NDL) Policy

## Purpose

To ensure compliance with federal regulations and maintain program integrity by prohibiting the use of federal reimbursement funds to pay any CACFP contractor listed on the USDA National Disqualified List (NDL).

## Regulatory Authority

This policy is established under **7 CFR §226.15(c)**, which requires institutions to retain final administrative and financial responsibility for program operations and prohibits contracting out for management of the program. Additionally, sponsors must comply with USDA guidance regarding the NDL.

## Definitions

- National Disqualified List (NDL): A USDA-maintained list of institutions, responsible principals, and individuals disqualified from participation in federal child nutrition programs.
- Contractor: Any individual or entity engaged by a sponsor to perform services, including bookkeeping, data processing, nutrition consulting, or food service.

## Policy Statement

- No CACFP sponsor may use federal reimbursement funds to pay any contractor who is currently listed on the NDL.
- Sponsors are responsible for verifying contractor status against the NDL prior to entering into any agreement.
- Sponsors must not engage, collaborate, or allow any individual or entity on the NDL to participate in any aspect of food program operations.
- Failure to comply will result in corrective action, fiscal disallowance, payback of program funds, and potential termination from participation in the program.

## Allowable and Prohibited Contracting

- Sponsors may contract for specific tasks (e.g., bookkeeping, nutritionist services) but must ensure contractors are not on the NDL.

- Contracting for management functions such as monitoring, corrective action, or application preparation remains prohibited under federal regulation.

## Compliance and Monitoring

The Office of Nutrition will monitor adherence to this policy through routine reviews and audits. Non-compliance may result in corrective action, fiscal disallowance, or potential termination as outlined in state and federal regulations.

## Documentation Required

- Sponsors can [create an account](#) to access the NDL and verify contractor status.
- Sponsors must maintain documentation of NDL checks for all contractors.
- The Ohio Department of Education and Workforce will review compliance during administrative reviews and audits.