

# 1. Serving meals which meet the CACFP meal patterns

CACFP meal requirements are determined by the USDA (United States Department of Agriculture) to meet the nutritional needs of the infant/child. Meals and snacks must meet the USDA component and quantity requirements. The USDA meal pattern was been updated. This change went into effect October 1, 2017.

Read the enclosed booklet: FDCH CACFP New Meal Pattern Training

# 2. Taking accurate meal counts

- Menus and meal counts must be recorded on Horizons approved forms by the end of each business day. Meal counts may not be recorded in advance.
- A current Child Enrollment Form or Annual Enrollment Renewal Form must be on file for each child enrolled for child care. This includes part time, drop in and before/after school care. Normal days, meals and times of attendance must be included.
- Child care attendance records must be up to date and available at the home visit to complete the Horizons Unlimited CACFP 5 day reconciliation.
- Each child may be claimed for two meals and one snack OR one meal and two snacks per day. If you are using manual forms, extra meals should be recorded on the yellow copy. If claiming online all meals can be recorded. Only days/meals with prior approval may be claimed. Be sure to call our office if you want to request an additional meal or snack for approval. The additional meal or snack must be within your approved hours of operation.
- All menus and meal counts must be available for review by Horizons
  Unlimited, Inc., WI DPI or the USDA at the childcare home during hours of
  operation. Meal counts are the number of meals served by type (breakfast,
  lunch, dinner or snack) to all enrolled children, recording by child name each
  day.
- If you will be away during an approved meal time or if you will be closed during the child care's official hours of business, notify the Horizons office by voice

mail, email or fax in advance to avoid meals being disallowed.

- Your own children or foster children may be claimed if they meet income guidelines and a nonresidential child is present and participating in the same meal or snack. If you meet income guidelines, your own children must be present and participating with the day care children to be reimbursed.
   Provider and all parent income applications expire June 30th of each year (except School and Census eligible areas). A new packet is sent for providers to renew their household eligibility status and to request income applications for their parents to complete.
- The number of children attending the child care and the number of children claimed for reimbursement cannot exceed authorized capacity as stated on your license or certification.
- The CACFP Application and Agreement, Attendance records, CACFP enrollment forms, menus and meal counts must be kept on file onsite in the home for the current month plus the prior 12 months, with the remaining 24 months of records on file and readily assessable.

# 3. Submitting accurate meal claims

The following criteria are important for accurate meal and snack claims. Failure to do the following may result in *lower reimbursement or loss of payment*.

- Only meal and snack types approved by Horizons and served during your regulated hours of operation may be claimed. Be sure to call our office if you want to request an additional meal or snack for approval. The meal or snack must be within your approved hours of operation.
- Children must have a **current enrollment** form or annual Enrollment Renewal Form on file at the Horizons Unlimited office.
- Meals and snacks must meet the meal pattern requirement.
   (Submitting a Diet Statement may be needed if the meal pattern cannot be met.)
- If more than one adult is needed to meet child/staff ratios, timesheets for all adults included in the child/staff ratio need to be sent with your claim.
- Infant meals (children under one year) must be recorded on the appropriate Infant Menu.
- Signed claims must be postmarked or electronically submitted by the

3rd of each month or it may be processed the following month. This could delay your check up to 2 months. If you are submitting on line, clicking on the submit button confirms your signature.

- Use only a black or blue ink pen on the manual forms. Colored inks and highlighters are difficult to read.
- Include any **new Enrollment Forms**, and **Diet Statements** if applicable.
- Your State Child Care License or County Certificate must be kept up to date in the office along with any updated restrictions. Please remember to submit all changes (name change, address change) and new certification / license to insure that you receive proper payment. Do not rely on Certifiers or Licensors to keep us informed of changes.
- If you provide child care on a holiday special documentation is needed:

If you claim online:

• Record any holiday care in the provider calendar.

If you claim using paper forms:

 Record holiday care provided on the meal count or menu.

# 4. How Horizons Unlimited, Inc. provider's monthly claims are reviewed.

A monthly claim is the information a provider submits to Horizons to process for reimbursement.

- The complete monthly claim must be postmarked or electronically submitted by the 3rd of each month to the Horizons Unlimited, Inc. office. Forms are dated on the day of arrival into the Horizons Unlimited, Inc. office. Reimbursement for claims postmarked after the 3rd of the month may be delayed up to 2 months. Please mail claims promptly.
- Be sure to put your return address and enough postage on the claim envelope.
- The claim must be submitted in its entirety; regular and infant menus, meal counts, child enrollment forms, timesheets and diet statements if applicable. If submitting online be sure to mail new child enrollment forms, timesheets and diet statements if applicable.

- Horizons Unlimited employees review each claim when it is submitted to the office. The following items are checked:
  - Whether it is a current or late claim.
  - > If child enrollment forms are included for new children.
  - The Certification/License with any restrictions is up to date and on file.
  - > That authorized capacity, days of operation, ages of children served, approved meals/snacks are claimed appropriately.
  - > Number of meal/snacks claimed per child is within program limits.
  - Tier status of the provider and/or enrolled children is reimbursed correctly.
  - ➤ The Provider signature is on the meal count. For online claims the submission is considered the electronic signature.
  - > Meal pattern requirements are met.
  - Compare claim to any home visits and household contacts.

When necessary some meals, snacks, or specific child meals may be disallowed if they do not meet the required elements. If a claim is submitted early (before all meals are served) those meals will be disallowed. A menu review letter along with a newsletter will be mailed or emailed each month. Online claiming providers can review the Office Error Report in their KIDKARE program.

# 5. The program's reimbursement system

The CACFP is a USDA reimbursement program to assist regulated home child care providers in meeting the nutritional needs of infants and children while in their care.

# To receive reimbursement:

- The provider submits meal counts, menus, new child enrollment forms, diet statements if needed, timesheets if needed, updated license or certification after the last meal service of the month. These forms need to be either postmarked or electronically submitted to the Horizons Unlimited, Inc. office by the 3rd of the month.
- CACFP employees review all information submitted.
- Horizon employees process each claim and provide a menu review letter or Office Error Report which includes meals disallowed and the reason.
- Direct deposits are made payable to the individual child care provider enrolled in the Horizon CACFP. Direct deposits are made the first Monday of the month. For example: A January claim is reimbursed by direct deposit the first Monday of March.

• A provider can submit a late claim or request an adjustment to an already paid claim up to 45 days after the last day of the claiming month to be eligible for reimbursement. Late claims and adjustments are reimbursed the 2<sup>nd</sup> Monday of the month and three months after the claiming month. For example: A late claim for March or a request for an adjustment to the March claim must be submitted or requested no later than May 15 to receive reimbursement. Reimbursement would be the 2<sup>nd</sup> Monday of June.

# **Upon receipt of your reimbursement:**

- Providers should verify meal totals paid with meal totals submitted.
- Keep your check stub with the claim for any audits that may be necessary. All
  food program claim materials must be kept on file onsite in the home for the
  current month plus the prior 12 months, with the remaining 24 months of
  records on file and readily assessable.
- The provider should call the Horizons Unlimited, Inc. office right away to discuss any discrepancies. All adjustments must be requested within 45 days of the last day of the month being claimed.
- Reimbursement deposits are only made to the individual child care provider enrolled in the Horizons Unlimited, Inc. and will be deposited into the bank account authorized by that person.

# 6. Compliance with Program's recordkeeping requirements including Civil Rights

- Making recordkeeping a priority helps keep your child care and home visits running smoothly. Putting a system in place will help to keep the paperwork in order and readily accessible.
- Keep your recordkeeping simple: perhaps by designating a certain time each day to organize or file your food program records. Record your menus and attendance at the same time every day so it becomes a habit.
- Use the handbook supplied by Horizons to maintain the current year's records. Have it ready for your Field Representative during your visit.
- Complete the required annual training by August 31st of each year

The CACFP Agreement between Sponsoring Organization and Childcare Home (DPI form # PI-1425) to participate in the Food Program. This is a permanent agreement and must always be maintained on file by the provider. You have agreed to abide by the Rights and Responsibilities of the Child Care Home. Noncompliance of these rules may result in meal disallowances or possibly being declared seriously deficient. Appeal rights will be offered if Horizons proposes to terminate you from CACFP participation for cause.

# The records you are required to maintain include:

- A copy of the non-expiring Agreement Between Sponsoring Organization and Day Care Home (PI-1425) and the Application
- Copies of CACFP Child Enrollment Forms and a copy of the annual Enrollment Renewal Report
- Copy of any applicable Diet Statements for children unable to follow the CACFP meal pattern.
- Certificate of Completion of the annual Recordkeeping training.
- Home Visit Forms
- Monthly menu and meal counts.
- Child Care Attendance Records.
- Menu Review Letters or Office Error Reports and check stubs.

What paperwork do I need to submit this year?	When is it due?	Additional Information
Monthly Claim	Must be recorded daily, and turned in <b>by the 3<sup>rd</sup></b> of the following month.	As part of the Provider/Sponsor Agreement, meal and attendance records must be updated daily. Please note that a late claim could result in up to a 3 month delay in reimbursement.
License or Certification	Due <b>immediately</b> when any changes occur on your license or certification	Your State Daycare License or County Daycare Certificate must be kept up to date in the office.
Enrollment Forms	Due <b>immediately</b> when a child enrolls in your child care.	Remember to include any applicable diet statements.
Child Enrollment Renewal Form	Due annually in <b>September</b> .	Watch for the renewal packet to be mailed in September.
Annual Recordkeeping Training	Due annually in <b>August</b> .	You will receive a new Annual Recordkeeping Training packet after February 1 <sup>st</sup> of each year.
Tiering Determination	Due annually in <b>July</b> .	Provider and parent income application expire June 30 <sup>th</sup> of each year (except School and Census eligible areas)

# **Civil Rights Policy and Procedures FY 2018**

## **GOALS OF CIVIL RIGHTS**

- Equal treatment for all applicants and beneficiaries
- · Knowledge of rights and responsibilities
- Elimination of illegal barriers that prevent or deter people from receiving benefits
- Dignity and respect for all

## WHAT IS DISCRIMINATION?

The act of distinguishing one person or group of persons from other, either intentionally, by neglect, or by the effect of actions or lack of actions based on their protected classes.

## WHAT IS A PROTECTED CLASS?

Any person or group of people who have characteristics for which discrimination is prohibited based on a law, regulation, or executive order.

## **DISCRIMINATION = FOUR D'S**

...an individual or group is:

- Denied benefits or services that others receive
- Delayed receiving benefits or services that others receive
- Treated **Differently** than others to their disadvantage
- Given **Disparate** treatment something which does not seem discriminatory, but has a
  discriminatory impact in practice

# **EXAMPLES OF DISCRIMINATION**

- Refuse a participant's enrollment based on disability
- Failure to provide reasonable accommodations to disabled individuals
- Serving meals at a time, place, or manner that is discriminatory
- Selectively distributing applications and income forms
- Failure to provide the same eligibility criteria to all participants
- Failure to provide foreign language materials regarding CACFP

#### COMPONENTS OF CIVIL RIGHTS COMPLIANCE

- Public Notification System
- Outreach and Education
- Data Collection
- Reasonable Accommodations
- Language Assistance
- Civil Rights Complaint Procedures
- Technical Assistance and Training
- Customer Service
- Conflict Resolution

# **EQUAL ACCESS**

- All participants who attend must be provided equal access to the benefits of the CACFP.
- To withhold the program from any eligible age group is age discrimination.

• Child Care/Emergency Shelter Sites: Infants must be offered infant formula and food at the child care center, and parents cannot be asked or required to supply these items.

## **PUBLIC NOTIFICATION**

Must include information on:

- Eligibility
- Benefits & Services (i.e. free or reduced price meals)
- Program availability
- Applicant rights and responsibilities
- Procedures for filing a complaint
- Non-discrimination policies
- Any programmatic changes (i.e. changing location of a meal site)

#### **METHODS OF PUBLIC NOTIFICATION**

- Public Release –Issued by State Agency
  - Inform the general public that your agency sponsors the CACFP and that meals are provided at no separate charge.
- Post "And Justice for All" Poster (required for group centers)
  - Includes the USDA's nondiscrimination statement and lists the USDA contact information for filing a complaint of discrimination.
- Other methods of public notification (optional):
  - o Bulletins
  - o Letters/Leaflets/Brochures
  - o Internet/Computer-based Applications

# "AND JUSTICE FOR ALL" POSTER (NOT REQUIRED IN FAMILY DAY CARE HOMES)



All group centers/agencies participating in Child Nutrition Programs must display the USDA's non-discrimination poster in a prominent area where participants and potential participants have access. Examples: cafeteria/food service area, office, centrally located bulletin board

Must be posted at every site

Must be 11" x 17" format

DPI provides posters to centers free of charge. To order posters, contact your assigned Consultant.



# **PUBLIC NOTIFICATION SYSTEM**

- All organizations participating in the CACFP must provide informational materials in the appropriate translation concerning the availability and nutritional benefits of the program
- News Media Release: DPI annually issues a statewide media release for all participating agencies.

# OUTREACH AND EDUCATION

- You want to reach as many potential participants as possible.
- · You want to ensure program access.
- You need to pay attention to under-represented groups.
- Include the required nondiscrimination statement on all appropriate FNS and agency publications, web sites, posters, and informational materials.
- When using graphics, reflect diversity and inclusion.



# **REQUIRED NON-DISCRIMINATION STATEMENT**

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint\_filing\_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) Mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) Fax: (202) 690-7442; or

(3) Email: program.intake@usda.gov

This institution is an equal opportunity provider.

If the material or document is too small to permit the full statement to be included, the material MUST, at a minimum, include: "This institution is an equal opportunity provider."

# **COLLECTING AND RECORDING PARTICIPATION DATA**

- Ethnic/Racial data is used to determine how effectively your program is reaching potentially eliqible participants and where outreach may be needed.
- Establish a system to collect ethnic and racial data on an annual basis
- Program applicants may not be required to furnish ethnicity and race
  - You may inform the household, however, that collection of this information is strictly for statistical reporting and has no influence on eligibility determination for the program.
- Data collectors may not second guess, change, or challenge a self-declaration of ethnicity/race made by a participant unless such declarations are blatantly false

# DATA COLLECTING AND REPORTING

Collect ethnic data first, then racial data

- Ethnicity categories:
  - o Hispanic or Latino

- Non-Hispanic or Non-Latino
- Racial categories (instructions should specify "mark one or more")
  - o American Indian or Alaskan Native
  - Asian
  - Black or African American
  - Native Hawaiian or other Pacific Islander
  - White

# **OBTAIN ETHNIC/RACIAL DATA THROUGH**



- Voluntary self-identification or self-reporting (preferred method)
  - Income application: Household applications that are completed each year and submitted to the center have a section for the household to identify their racial and ethnic data (households are not required to complete this)
  - o Ethnic and Racial Data Form
- If a household chooses not to provide racial/ethnic information, you may use one of the following two methods:
  - Visual identification by a center official
  - Personal knowledge, records or other documentation your agency possesses that identifies household racial/ethnic data.

#### **DATA MANAGEMENT**

- Collection systems must ensure that data collected/retained are:
  - Collected and retained by each program site
  - Kept secure and confidential
  - o Submitted, if requested, to FNS Regional or Headquarters Offices
  - Kept on file for 3 years plus the current program year
  - Identify all sources of information used

# **CONFLICT RESOLUTION**

- The USDA recommends using an Alternative Dispute Resolution (ADR) program
  - ADR Definition: use of a neutral third party (usually a person acting as a facilitator) to resolve informally a complaint of discrimination through use of various techniques such as fact finding, mediation, peer panels, facilitation, ombudsman support, or conciliation.
- For more information, visit:http://www.fas.usda.gov/about-fas/civil-rights/alternative-dispute-resolution-adr-program

# REASONABLE ACCOMMODATION OF PERSONS WITH DISABILITIES: PROVIDING FOOD SUBSTITUTIONS

- A disability is defined as any physical or mental impairment substantially limiting one or more
   " major life activities", including digestion.
  - a. This includes food allergies and intolerances.
- Programs are required to reasonably accommodate paticpants whose disabilities restrict their diets by providing substitutions or modifications for thier meals, when supported by a proper medical statement.
- · The medical statement must:
  - a. Be from a licesned healthcare professional authorized to write medical perscriptions under Wisconsin law These are: Licensed Physicians; Physician Assistants; and Advance Practice Nurse Prescribers (APNP).
  - b. Include a description of the impairment, how to accommodate it, what foods must be omitted, and what foods to provide substitutions.

# LANGUAGE ASSISTANCE: LIMITED ENGLISH PROFICIENCY (LEP)

#### Definition:

- Individuals who do not speak English as their primary language and have limited ability to read, speak, write, or understand English.
- Recipients of Federal financial assistance have a responsibility to take reasonable steps to ensure meaningful access to their programs and activities by persons with LEP.

# LIMITED ENGLISH PROFICIENCY (LEP)

- Participants should not be used as interpreters.
- Volunteers may be used, but make sure they understand interpreter ethics –particularly confidentiality!
  - Example: Staff with Spanish language skills could assist a household in completing an application but would need to be trained on the importance of keeping all information received from the household confidential

# LIMITED ENGLISH PROFICIENCY (LEP)

- See www.lep.govfor more information and resources
- Documents translated in Spanish and Hmong (Wisconsin specific forms)
  - :http://dpi.wi.gov/community-nutrition/cacfp/translations
- Household-Size Income Statement Forms in other languages (USDA Forms)
  - :http://www.fns.usda.gov/cacfp/meal-benefit-income-eligibility

Please Note: the document includes the various forms for all CACFP components; identify the appropriate form within the English document first to know which of the translated documents to give the households.

# A SHORTAGE OF RESOURCES DOES NOT ELIMINATE THE TRANSLATION REQUIREMENT

# Suggestions:

- Share resources to save money
  - Use interpreter from another area
  - Train bilingual staff to be interpreters
  - Contact grassroots organizations to discuss translation or assistance from within the community
- Language line phone services may be available for a subscription fee through your local telephone service provider

# RIGHT TO FILE A COMPLAINT

Any person who believes he or she or someone he/she knows has been discriminated against based on Federal protected classes (i.e. National origin, race, etc.) has a right to file a complaint within 180 days of the alleged discriminatory action.

- Complainants should complete the USDA Program Discrimination Complaint Form
- Complainants may contact either of the following offices to register a complaint:
  - USDA-Office of the Assistant Secretary for Civil Rights: Refer above for the address, fax number, and email address.
  - Wisconsin DPI: Director, Community Nutrition Programs, 125 South Webster Street,
     P.O. Box 7841, Madison, WI 53707-7841, (608) 267-9129

## HANDLING CIVIL RIGHTS COMPLAINTS

- Complaints can be written or verbal
- Anonymous complaints should be handled as any other complaint
- All verbal or written complaints must be forwarded to the WI DPI or Civil Rights Division of USDA Food and Nutrition Service within three days of receiving a complaint
- Sponsors must give complainants a Civil Rights Complaint Form to complete Document all potential complaints in a Civil Rights Complaint Log
- Have a central location where the Civil Rights Complaint Forms and Civil Rights Complaint Log will be kept

## THE FOLLOWING INFORMATION SHOULD BE INCLUDED IN A CIVIL RIGHTS COMPLAINT

- Name, address, phone number of complainant, if provided (not required)
- Specific name and location of entity delivering the benefit or service
- The nature of the incident, action, or method of administration that led the complainant to feel discriminated against
- The basis on which the complainant feels discrimination exists (race, color, national origin, sex, age, or disability)
- The names, titles, and business addresses of persons who may have knowledge of the discriminatory action
- The date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such action

## **CIVIL RIGHTS TRAINING FOR AGENCY STAFF**

- All staff who work with the CACFP must receive training on all aspects of civil rights compliance annually
- Topics:
  - o What is Discrimination?
  - o Collecting/recording racial/ethnic data
  - Where to display posters
  - o What is a Civil Rights complaint
  - o How to handle a Civil Rights complaint
- Retain training records of the people who received civil rights training

#### **CUSTOMER SERVICE**

- All participants must be allowed equal opportunities to participate in Child Nutrition programs regardless of race, color, national origin, sex, age, or disability.
- All participants must be treated in the same manner (i.e. seating arrangements, serving lines, services and facilities, assignment of eating periods, methods of selection for application approval processes).

# UNDERSTANDING DIFFERENCES: RESPECTFUL LANGUAGE

- Put the person first
  - o Example: USE "person with a disability", NOT "disabled person"
- Use culturally sensitive language
  - □Example: USE "Asian", NOT "Oriental"
- Use inclusive/respectful terms
  - Example: USE "chair", NOT "chairman"

The Side Road -Business Communication:

http://www.sideroad.com/Business Communication/politically-correct-language.html

# ASK YOURSELF EACH TIME YOU INTERACT WITH PARTICIPANTS...

- How would I want to be addressed?
- Am I treating this person in the same manner I treat others?
- Have I informed this person exactly what information I need to make a determination on the application?
- Have I given this person the opportunity to clarify all relevant factors or inconsistencies and ask questions?
- Have I provided this person with needed information to make necessary decisions?

# **CIVIL RIGHTS "MUST DO LIST"**

- Provide the CACFP in a nondiscriminatory manner
- Must offer meals to all participants in care and provide meal substitutions to participants with disabilities
- Group centers must prominently display the "And Justice for All" poster
- Non-discrimination statement & complaint filing procedure must be on all printed materials available to the public which mention USDA and/or CACFP, including websites
- Annually complete the Ethnic and Racial Data Form
- Child Care/At-Risk/Emergency Shelter Centers Only:
  - Distribute the Building for the Future flier to all newly enrolling families
  - o Distribute the Infant Meal Notification form to families of all newly enrolling infants
- Provide informational materials in the appropriate translation concerning the availability and nutritional benefits of the CACFP
- Train staff annually on Civil Rights and complete a training form
- Develop & fully implement your Civil Rights Complaint Procedure
- Make available to all staff: Civil Rights complaint forms, Civil Rights Log and Civil Rights complaint procedure
- Refer all Civil Rights complaints to DPI or USDA