



Horizons Unlimited

Child and Adult Care Food Program 2019 Annual Recordkeeping Training

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. (**See included Meal Pattern Charts**)

FLUID MILK

- Required at breakfast, lunch, and supper
- Must be pasteurized and meet Grade A standards

Creditable Milks:

- Whole
- 1% (low-fat)
- skim (fat-free)
- kefir
- lactose-free
- lactose-reduced

Required Milks:

- 1 year olds: unflavored whole
- 2-5 year olds: unflavored 1% or skim
- 6-12 year olds: unflavored or flavored 1% or skim
- Cannot be served to infants (less than 12 months of age)
- Must be fluid drinkable milk
- Not creditable when used in cooking (i.e. cooked cereals, soups, pudding, etc.)
- If served at snack, juice cannot be served as the other component

GRAINS

- Required at breakfast, lunch, and supper
- The first ingredient, or second after water, must be whole grain or enriched grain
- Veggie straws, chips, or sticks, and tortilla chips are only creditable as a grain when the first ingredient, or second after water, is a whole or enriched grain.

Whole Grain Rich (WGR): At least one serving of grains per day must be whole grain-rich (WGR)

- WGR foods contain 100% whole grains, or at least 50% whole grains and the remaining grains are enriched

Identifying Whole Grain Rich (WGR): There are six options to determine if a grain product meets the WGR criteria. Any one of the options may be used. They are detailed in the CACFP Reference Guide. (Received on a home visit)

Breakfast cereals (ready-to-eat, instant & hot cereals) must be whole grain, enriched or fortified

- Breakfast cereals must contain no more than **6 grams of sugar** per dry ounce
- Programs cannot mix creditable cereals that meet sugar limits with non-creditable cereals that are above sugar limits to meet sugar limit requirements.

Grain-Based Desserts (GBD) are not creditable and cannot be served to meet the grains component

- Examples include granola bars, cookies, cake, cereal bars and toaster pastries.
- Even if the GBD is homemade with healthy ingredients, whole grains or less sugar, it is not creditable

MEAT/MEAT ALTERNATE (M/MA)

- Required at lunch and supper
- A M/MA may be served at breakfast, in place of grains, up to three days/week

Creditable M/MA:

- Lean meat
- Poultry
- Fish
- Cheese
- Eggs
- Cooked dry bean or peas
- Peanuts, soy nuts, tree nuts or seeds and their butters
- Yogurt
- Tofu
- Tempeh
- Soy products or alternate protein products

- Cooked dry beans or peas may not be served as a meat alternate and a vegetable in the same meal
 - Yogurt (regular and soy) must contain no more than 23 grams of sugar per 6 ounces
 - Creditable Cheese: natural or processed, cottage, ricotta, cheese spread, cheese food
- Store-bought combination foods** (i.e. chicken nuggets, pizza, ravioli, fish sticks, corn dogs, etc.) and some processed meats (i.e. pepperoni, turkey bacon) must have a Child Nutrition (CN) label or Product Formulation Statement (PFS) from manufacturer on file prior to serving. (See attachment- Store-Bought Combination Foods)

Processed meats (i.e. hotdogs, bologna, sausage):

- 100% meat ingredients are creditable (may contain salt and seasonings)
- If item contains fillers (i.e. byproducts, cereals, binders, or extenders) it is not 100% meat and requires a CN label or Product Formulation Statement (PFS) on file prior to serving
 - Common binders/extenderes: soy flour, starchy vegetable flour, calcium reduced dried skim milk, dried milk, modified food/ vegetable starch, soy protein concentrate, cereal, isolated soy protein, carrageenan, hydrolyzed milk protein.

Tofu: Creditable for participants ages 1 and older. Must be commercially prepared firm, extra firm, soft, or silken.

- 2.2 oz. (1/4 cup) of tofu containing at least 5 grams of protein = 1.0 oz. meat alternate Use the Nutrition Facts Label and the calculation below to determine if tofu is creditable: Protein (g) ÷ Serving Size (oz.) or (g) = Threshold for ounces: 2.27 or more; Threshold for grams: .08 or more

FRUIT AND VEGETABLES (TWO SEPARATE COMPONENTS)

- One serving of vegetable, fruit or both is required at breakfast
- One serving of fruit and one serving of vegetable (or two different vegetables) is required at lunch and supper
- One fruit and one vegetable may be served at snack as two components

- Cooked dry beans or peas may not be served as a vegetable and a meat alternate in the same meal

The following vegetable and fruit serving sizes vary from the meal pattern chart:

- 1 cup raw leafy greens (e.g. lettuce) = ½ cup vegetable
- ¼ cup dried fruit (e.g. raisins) = ½ cup fruit

Juice must be full strength (100%) fruit or vegetable juice and must be pasteurized

- If served at snack, milk cannot be served as the other component
- Can only be served once per day. This applies to all meals and snacks, even when served to different groups of participants.

Smoothies: Pureed fruits and vegetables served in a smoothie are considered juice. This counts as serving juice once per day.

DRINKING WATER

- Drinking water must be available and offered to participants throughout the day, including at meal times. However, water is not part of a reimbursable meal and may not be served in place of milk. Serve water with snacks when two creditable food components are served with no other beverage. Younger children must be asked frequently, throughout the day, if they want water. Water can be made available in a variety of ways: cups next to a sink, assigned water bottles, pitchers of water with cups set out, and scheduled water breaks, etc.

INFANT MEAL REQUIREMENTS

All providers caring for infants must offer to supply the following to all enrolled infants:

- At least one creditable iron-fortified infant formula (IFIF). Providers should select a formula that meets the needs of the majority of infants in care.
- Creditable, developmentally-appropriate infant foods

Families may choose whether they would like their infant to receive the provider-supplied formula and foods, or if they would like to supply breast milk, a different formula, and/or foods. **Families cannot be required to supply formula or foods.**

INFANT MEAL PATTERN

Meals and snacks must meet CACFP infant meal pattern requirements with creditable foods in at least the minimum serving sizes per the CACFP infant meal pattern chart. (See [included infant meal pattern chart](#))

DEVELOPMENTALLY READY

- The CACFP infant meal pattern age groups are guidelines for when to serve foods to infants. It is recommended to only serve breastmilk and/or formula for the infant's first 6 months and introduce foods around 6 months of age. However, some infants are ready to eat foods before 6 months while others will not be ready to eat foods until after 6 months. For this reason, food amounts listed in the meal pattern begin with zero (0) because USDA recognizes that not all infants are developmentally ready to eat solid foods at a certain age. It does not mean serving the food is optional. Once an infant is developmentally ready to eat solid foods, including infants younger than 6 months, providers are required to offer them to the infant.
- An infant's developmental readiness determines when to introduce foods, how often to serve foods, which foods to feed, the texture of foods, and which feeding styles to use. For example, new foods may be introduced one at a time over the course of a few days or an infant may eat a food item one week and not the next. Providers should be in constant communication with families to determine what and when to introduce specific foods. Refer to the included Developmental Readiness handout for more information.

BREASTMILK

- Breastmilk may be served to infants and children of any age, there is no age limit.
 - Support mothers who breastfeed by encouraging them to breastfeed on-site or supply breastmilk while their infant is in care. Offer a quiet, private area that is comfortable and sanitary when they breastfeed on-site.

IRON-FORTIFIED INFANT FORMULA (IFIF)

- A creditable IFIF is any infant milk or soy-based formula regulated by the Food and Drug Administration (FDA) and labeled as "iron-fortified", "infant formula w/ iron" or other statement on front of package.

INFANT FOODS

- Foods creditable to the infant meal pattern include homemade baby food, table food, and certain store-bought jarred and packaged baby food

Homemade Baby Foods: Whole fruits, vegetables, and meat/meat alternates may be pureed, ground or mashed to the appropriate size and texture.

Table foods: Foods on the regular menu for children older than 1 year may be served to infants when they are developmentally ready to eat them. The infant meal pattern must be followed (all required components offered) even when the infant is consuming some or all table foods.

Store-bought baby food: There is a variety of commercially prepared foods for infants and not all are creditable to the CACFP. Below is an overview of what to look for when purchasing these foods.

- **Iron-Fortified Infant Cereal (IFIC):** Must be single grain (e.g. rice, oatmeal, wheat) or multigrain
- **Fruits and Vegetables:** Must be single fruits, vegetables, or a mixture of fruits and/or vegetables
- **Meats:** Must be single meats or poultry; gravy and broth are ok
- **NOT CREDITABLE:** Foods that contain multiple components together in a jar or package. This includes dry infant cereal containing fruit (e.g. infant cereal with apples) and jarred and packaged purees, entrees, or meals (e.g. fruit and yogurt purees, or chicken vegetable dinner).

Disabilities

Providers must make reasonable modifications to meals/snacks, including providing special meals at no extra charge, to accommodate disabilities that restrict a participant's diet. This is required only when supported by a written medical statement from a state licensed healthcare professional.

WHAT IS A DISABILITY?

- A disability is a physical or mental impairment that substantially limits one or more "major life activities" including caring for oneself, performing manual tasks, eating, breathing, digestive, bowel and bladder, neurological, respiratory, circulatory, and endocrine functions.
 - Most physical or mental impairments will constitute a disability, it does not need to be life threatening. It is enough that the impairment limits a major life activity.
- **Example:** Digestion is a major life activity; therefore, a participant whose digestion is impaired by lactose intolerance may be a person with a disability, regardless of whether or not consuming milk causes severe distress.

MEDICAL STATEMENTS FOR A DISABILITY

- A disability must be supported by a medical statement completed and signed by a state licensed healthcare professional who is authorized to write medical prescriptions under state law. In Wisconsin, this is a Physician, Physician Assistant, and Nurse Practitioner (APNP). Statements from non-licensed health care professionals (e.g. registered nurse, dietitian, or chiropractor) cannot be accepted as a valid statement for a disability requesting foods that do not meet meal pattern requirements.
- A **valid medical statement** for a disability must include the following information:
 - Description of impairment (reason for request)
 - How to accommodate the impairment (e.g. items(s) to be avoided and recommended substitution(s))
 - Providers must seek clarification if a medical statement is unclear or lacks sufficient detail so that a proper and safe meal can be provided.
- After a medical statement for a disability is obtained, the provider must complete *Section I* of the **Special Dietary Needs Tracking Form**. (Given to you at a home review)

ACCOMMODATING DISABILITIES

- Providers must accommodate participants with disabilities with an appropriate modification.
- The medical statement from a state licensed healthcare professional identifying how to accommodate the disability and/or recommended substitution(s) must be followed.
- Providers are not required to provide the exact substitution or modification requested, however, must work with the family to determine a reasonable modification that effectively accommodates the disability.
 - For example, a family may request a particular brand name substitute. While a provider is not required to provide the brand name item identified, it must offer a substitute that does not contain the specific allergen that affects the participant.
- Providers can accommodate multiple participants with the same type of disability by offering one type of substitution. However, every situation must be evaluated on a case-by-case basis to determine if the modification is appropriate.
- Providers are not required to make modifications that may be so financially burdensome that they would make continued operation of the CACFP unfeasible.

NON-DISABILITY SPECIAL DIETARY NEEDS (SDN)

A non-disability special dietary need is:

- Eating certain foods or eliminating foods from the diet due to a general health concern and/or preference such as eating organic, vegetarian, or for religious or ethnic preferences.
- Includes medical-related requests that are not a disability or not supported by a valid written medical statement.
- **Examples:**
 - A request that a participant is not served cow's milk due to eating vegetarian, not because the participant has lactose intolerance
 - A request that a participant be served gluten-free foods based on the belief that a gluten-free diet is healthier, not because the participant has celiac disease

WRITTEN STATEMENTS FOR A NON-DISABILITY SPECIAL DIETARY NEED

- Documentation must be on file to support requests for a non-disability special dietary need.
- For a non-disability SDN request that is a family preference, a written statement from the family or the *DCF Health History and Emergency Care Plan* must be on file, and must include:
 - The non-disability dietary need including foods not to be served and allowable substitutions.
 - A statement that the family chooses to provide foods (if applicable) and the foods that will be provided.
- After a statement for a non-disability request is obtained, the provider must complete *Section II* of the **Special Dietary Needs Tracking Form**. (Given to you at a home review)

ACCOMMODATING NON-DISABILITY SPECIAL DIETARY NEEDS

- Providers are not required but may choose to accommodate non-disability SDN requests. When accommodating non-disability SDNs, modifications must meet CACFP meal pattern requirements (i.e. all required components are served and substituted food(s) and/or beverage(s) are creditable).
- Families may choose to provide one creditable component towards a reimbursable meal. It is the responsibility of the provider to ensure that food substituted meets meal pattern requirements.

NON-DAIRY BEVERAGES

Non-dairy beverages nutritionally equivalent to cow's milk are creditable and can be served as a milk substitute for a disability or non-disability special dietary need. Non-dairy beverages when served to children 1-5 years old must be unflavored.

- **Creditable non-dairy beverages:** Several soymilks nutritionally equivalent to cow's milk are listed in the your handbook. When served in place of cow's milk, the meal may be claimed.
- **Non-creditable non-dairy beverages:** Almond, cashew, coconut, hemp, oat, and rice milks, juice and water, etc. are not nutritionally equivalent to cow's milk. When served in place of cow's milk, the meal cannot be claimed without a valid Diet Statement.

2. Taking accurate meal counts

- Menus and meal counts must be recorded in KidKare or 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 reimbursed for two meals and one snack **OR** one meal and two snacks per day. When 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 voicemail, email or in KidKare in advance to avoid meals being disallowed.
- Your **own children/residential 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 and Tracking form 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/ Tracking Statement**, 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 or call Horizons.

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 2nd 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 2nd 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

- **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 designate 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 and Tracking Forms 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 by the 3rd 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 immediately when any changes occur on your license or certification	Your State Daycare License or County Daycare Certificate must be kept up to date
Enrollment Forms	Due immediately when a child enrolls in your child care.	Remember to include any applicable diet statements.
Child Enrollment Renewal Form	Due annually in September .	Watch for the renewal packet to be mailed in September.
Annual Recordkeeping Training	Due annually in August .	You will receive a new Annual Recordkeeping Training packet after February 1 of each year.
Tiering Determination	Due annually in July .	Provider and parent income application expire June 30 th of each year (except School and Census eligible areas)

7. Civil Rights Policy and Procedures FY 2019

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):
 - Bulletins
 - Letters/Leaflets/Brochures
 - 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.

Building For the Future

The Building For the Future (BFF) program is a USDA initiative to provide nutrition education and information to children and their families. BFF is a part of the CACFP and is designed to help children and their families understand the importance of healthy eating habits.

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Organizations participating in the CACFP must provide BFF materials to all children and their families.

Child Care Centers (CCC) and Emergency Shelter Sites (ESS) must provide BFF materials to all children and their families.

Family Day Care Homes (FDCH) must provide BFF materials to all children and their families.

Home Day Care (HDC) must provide BFF materials to all children and their families.

State agencies must provide BFF materials to all children and their families.

USDA provides BFF materials to all children and their families.

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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, audiotope, 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 eligible 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:
 - Hispanic or Latino

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

OBTAIN ETHNIC/RACIAL DATA THROUGH

COMPLETE AND RETAIN ON FILE
DO NOT SUBMIT TO DPI UNLESS REQUESTED

ETHNIC and RACIAL DATA FORM	
Instructions: Count each participant TWICE, once for ETHNICITY, then by RACE. A participant can be counted multiple times from one RACE category. Complete instructions are on the back of this form.	
Agency Name:	Site Name (if different):
Name of Agency Representative:	Site Address:
ETHNIC CATEGORIES – Select either Hispanic/Latino OR Not Hispanic/Latino for each enrolled participant	
Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term "Hispanic" includes an additional "Hispanic or Latino."	Number of Participants
Not Hispanic or Latino	
RACIAL CATEGORIES – Select at least one category for each enrolled participant	
American Indian or Alaskan Native: A person having origin in one of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment.	Number of Participants
Asian: A person having origin in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodian, Chinese, Filipino, Indian, Japanese, Korean, Laotian, Malaysian, Pakistani, Philippine, Thai, Vietnamese, and Chinese.	
Black or African American: A person having origin in any of the black racial groups of Africa. Terms such as "Black" or "African" could refer to ethnicity. Black or African American.	
Native Hawaiian or Other Pacific Islander: A person having origin in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	
White: A person having origin in any of the original peoples of Europe, the Middle East or North Africa.	
Agency Representative Signature:	Date:

- 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)
 - 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
 - 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 participants whose disabilities restrict their diets by providing substitutions or modifications for their meals, when supported by a proper medical statement.
- The medical statement must:
 - a. Be from a licensed healthcare professional authorized to write medical prescriptions 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 substitution

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.gov for 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
 - :http://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf
- 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:
 - What is Discrimination?
 - Collecting/recording racial/ethnic data
 - Where to display posters
 - What is a Civil Rights complaint
 - 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
 - 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
 - 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