

Community Nutrition Programs

Child and Adult Care Food Program (CACFP)

[Guidance Memorandums](#) [CACFP Webcast Trainings](#) [Translated Documents](#)

Applies To: Adult Care Centers

Independent Centers and Sponsoring Organizations

Revision Date: July 2016

Purpose:

Guidance Memorandum 1A details the CACFP requirements pertaining to Household Size-Income Statements and determining eligibility enrolled participants. It includes instructions and forms to use for meeting these requirements. Additional resources are referenced to access more detail in specific areas if needed. Webcast trainings and complimentary handouts are also referenced for further review of the requirements.

Required Documents and Forms:

- [Household Size-Income Statement Form \(HSIS\) \(7/16\)](#)
- [The Household Letter](#)
- [Household Size-Income Scale \(July 1, 2016 - June 30, 2017\)](#)
- [Excel Version of Household Size-Income Record](#)
- [Word Version of the Household Size-Income Record](#)

Resources:

- [USDA's Eligibility Manual for School Meals](#)
- [Making HSIS Determinations: Instructions for Using the Household Member's Signature Date](#)
- [Electronic Storage of CACFP Records and Data - Policies and Procedures](#)
- Webcasts:
 - [Household Size-Income Statements](#)
 - [Household Size Income Record](#)

Overview:

The *Household Size-Income Statement (HSIS)* collects household size and income level information from eligible participants enrolled at adult day care centers participating in the CACFP. This information is required for determining the reimbursement rate the agency will receive for meals served. The three USDA reimbursement rates per meal are assigned to terms that represent each reimbursement amount. From the highest to the lowest rate, these terms are: Free; Reduced; and Non-needy.

Participating agencies must distribute, collect, and determine/approve the HSIS forms completed by the households of each eligible participant on annual basis. Free and Reduced eligibility determinations can only be based on completed HSIS. The HSIS eligibility determinations for all enrolled eligible participants are then compiled and reported on the monthly *CACFP Reimbursement Claim*.

- Refer to [Guidance Memorandum 2 - CACFP Reimbursement](#) for further information on the eligibility categories (Free, Reduced, and Non-needy) and their associated reimbursement rates as well as the calculation process of the *CACFP Reimbursement Claim*.
- Refer to [Guidance Memorandum 3A - Claims Submission and Processing](#) for further instruction on compiling and submitting monthly reimbursement claims.

The most current *Household Size-Income Statement* and accompanying *Household Letter* must be distributed annually to all enrolled eligible participants (functionally impaired adults and/or persons 60 years or older) who **do not** reside in an institution (nursing homes, Community Based Residential Facilities, and Adult Family Homes) without discrimination. Both forms are revised in July of each year.

A. The Importance of Valid Household Size-Income Statements

[Household Size-Income Statement Form \(HSIS\) \(7/16\)](#)

[Webcast Training on Household Size-Income Statements](#)

Agencies are required to have on file current, complete, correctly determined and approved HSIS for each enrolled eligible participant who is counted in the Free and Reduced categories. One HSIS can be collected per household for all eligible participants living within that household; a separate HSIS form does not have to be completed for each eligible participant within the household.

- **A valid HSIS means that the HSIS is current and has been fully completed by a household member of the eligible participant's household and is then properly approved by the agency. (As specified sections F and G in this guidance memorandum)**

An eligible participant who does not have a valid HSIS on file must be counted as Non-needy. A HSIS is invalid when:

- An adult household member refuses to complete a HSIS or fails to return it to the agency.
- The HSIS is missing any required information as specified within this guidance memorandum.
- The HSIS has expired (it is past the last day of the 13 month validity period).

Confidentiality:

In accordance with disclosure protection requirements, all collected information on the HSIS must remain confidential and the HSIS forms must be retained in a location that provides a safeguard of confidentiality.

B. Household Letter

[Household Letter \(Adult Care Centers\)](#)

The *Household Letter* explains the purpose of the HSIS form and lists the required information that the eligible participants must provide on this form, if they choose to do so. It provides the income eligibility guidelines which include both the Free and Reduced levels of income.

- Each household must be given the *Household Letter* with the HSIS. The letter to use is included in this memorandum.

Eligible participants are not required to complete the HSIS and return it to the agency; this is voluntary. However, agencies may encourage the eligible participants or their households to return the HSIS by writing "N/A" across the form even if their household isn't eligible as Free or Reduced. If their household does not receive any of the qualifying benefits and the total household income exceeds the income eligibility guidelines, the household's eligibility category is Non-needy regardless whether they return the HSIS form to your agency.

C. Determining and Approving Household Size-Income Statements

Once the enrolled eligible adult participant has returned a completed HSIS, the agency must determine and approve the HSIS by fully completing the *For Center Use Only* portion on the bottom of the form. Agencies must designate a “Determining Official” or “DO” who is responsible for reviewing, determining and approving all HSIS. The DO must keep all information collected on the HSIS as confidential.

To determine the eligibility category and approve the HSIS, the DO must fully complete all three sections (Sections 1, 2, and 3) of the bottom portion of the HSIS (*For Center Use Only*):

- **Section 1:** the *Basis for Determining Eligibility*
(A. household size and income **or** B. participation in a benefits program);
- **Section 2:** the *Eligibility Determination* (Free, Reduced or Non-needy); and
- **Section 3:** the *Determining Official’s Initials and Approval Date* **and**
the *Effective Month of the Determination*

D. Effective Month of HSIS Determinations

1. Methods

The effective month of the Free or Reduced status of each eligible participant may be established by one of two methods described below in “a” or “b”. Each agency must choose the method it will use to establish the effective month of **ALL** complete HSIS. The chosen method must be selected within the online CACFP contract that is approved by the Wisconsin Department of Public Instruction (DPI). This method must be consistently applied to all HSIS determinations for the entire Federal Fiscal Year (FFY) (October 1 – September 30). If it is found that an agency is not consistently applying the chosen method to all HSIS for the entire FFY during a review by DPI, it will result in fiscal action or claim adjustments.

Guidance Memorandum 1A: CACFP Requirements for Household Size-Income Statements

a. Approval Date by Agency:

If the agency chooses to base the *Effective Month of Determination* on the DO's approval date, the *Effective Month of Determination* is the month/year of the date written in Section 3, the *Determining Official's Initials & Approval Date*, of the *For Center Use Only* box on the HSIS.

b. The Adult Household Member's Signature Date:

If the agency chooses to base the *Effective Month of Determination* on the Household Member's Signature Date, the *Effective Month of Determination* is the month/year of the date written in the *Signature Date* box next to the household member's signature.

→ **The exception to this rule:** If the Household Member's Signature Date is not within the same month of the DO's Approval Date or the month immediately preceding the DO's Approval Date, the *Effective Month of Determination* must be the month/year of the DO's Approval Date (choice "a" illustrated below). It cannot be the month/year as shown in the *Signature Date* box next to the adult household member's signature.

The *Effective Month of Determination* for an incomplete HSIS must be based on the unchanged Household Member's Signature Date (if the he/she chooses not to update it) or the updated Household Member's Signature Date (if updated by him/her); the same rule as stated above applies to the unchanged or updated Household Member's Signature Date.

[Making HSIS Determinations: Instructions for Using the Household Member's Signature Date](#): this resource provides an excellent illustration of how this rule applies.

The image below illustrates the choices, "a" and "b", for the Effective Month method.

The Bottom of Form

Signature of Adult Household Member		Signature Date Mo./Day/Yr.	Last 4 digits of SS# (or check "None" if you do not have a SS#) ***-**-____ <input type="checkbox"/> None
<i>FOR CENTER USE ONLY – All 3 sections and the Effective Month of Determination must be completed</i>			
Section 1: Basis of Determining Eligibility (A or B)		Section 2: Eligibility Determination	Section 3: Determining Official's Initials & Approval Date
A. Household Size & Income Total Household Size _____ * Total Income \$ _____ / _____ <small>(5 Amount) (Time Period)</small>		<input type="checkbox"/> Free <input type="checkbox"/> Reduced <input type="checkbox"/> Non-Needy	_____ **Effective Month of Determination _____ Month/Year

2. The Effective Month of Determination

Depending on the chosen method of "a" or "b" described above, the DO must write in that respective month/year within the *Effective Month of the Determination* box.

Free or Reduced eligibility determinations are effective the first of the month of the *Effective Month of the Determination*.

3. Incomplete HSIS

If a collected HSIS is incomplete because of missing any of the required information, as specified in sections F and G, the adult participant's eligibility status must remain as Non-needy until all of the required information is properly documented on the HSIS. Once all of the required information is properly documented on the HSIS, the DO must determine and approve the HSIS.

a. *Effective Month of Determination* for Incomplete HSIS:

→ **If your agency has selected using the DO's Approval Date for the *Effective Month of the Determination*:**

The *Effective Month of the Determination* of an eligible participant's Free or Reduced status must be the month/year of the Approval Date written by the DO (method "a").

→ **If your agency has selected using the Household Member's Signature Date for the *Effective Month of the Determination*:**

The Household Member's Signature Date only can be used for the *Effective Month of the Determination* **if the unchanged or updated Household Signature Date is in the same month or immediately preceding month as the Approval Date by the DO.** If the unchanged or updated Household Member's Signature Date is earlier than the month immediately preceding the Approval Date, then method "a", or the DO's Approval Date must be used for the *Effective Month of the Determination*.

b. Making Proper Alterations:

The HSIS is a legal document and must be treated as such. Agencies must make all attempts to have the eligible participants fully complete the HSIS by providing all required information, as specified in this guidance memorandum. However, if the eligible participants return incomplete forms, the agency's DO or designated staff who fully understand the confidentiality requirements may obtain the required information through other methods, with the exception of the Household Member's Signature and Household Member's Signature Date.

These acceptable methods are by phone, text, or email from the household. **If the required information is obtained by the agency, the following three pieces of information must be documented next to the acquired information on the HSIS form:**

- **The agency staff's initials;**
- **The date the information was added to the HSIS; and**
- **The source of information (i.e. per John by email)**

E. Duration of HSIS Determinations

HSIS are valid starting from the first of the month of the agency's *Effective Month of the Determination* through the last day of that month a year later (see section D, above, for the allowed methods for establishing the effective month); thus, the duration of HSIS determinations are for a thirteen month period.

Examples:

- **If the *Effective Month of Determination* is the month (and year) of the DO's Approval Date (method "a"):**

DO's Approval Date: May 12, 2015

Effective Month of Determination: May, 2015

Duration of eligibility: May 1, 2015 through May 31, 2016

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- If the *Effective Month of Determination* is the month (and year) of the Household Member's Signature Date (method "b"):
Household Member's Signature Date: April 30, 2015
Effective Month of Determination: April, 2015
Duration of eligibility: April 1, 2015 through April 30, 2016

Once the HSIS has expired (*it is past the last day of the last month of the validity period*), the HSIS is no longer valid and the eligible participants must be counted as Non-Needy until a new HSIS is completed by the household, submitted to the agency, and properly determined by the Determining Official (DO).

F. Determining Eligibility by Participation in a Benefits Program

1. Benefits Programs:

An eligible participant is automatically eligible as Free when the adult's household participates in one or more of the following four benefit programs, the adult's household provides the case number for at least one benefit within Part 1 on the HSIS, completes Part 3 (*the Ethnicity and Race Data Collection section is optional*), and then the DO properly approves it (as specified in section F2 below).

a. Supplemental Nutrition Assistance Program (SNAP) (FoodShare Wisconsin)

- The case number must be 10 digits or it must be 16 digit Quest card number.

b. Supplemental Security Income (SSI)

c. Medicaid

d. Food Distribution Program on Indian Reservations (FDPIR)

- The case number must be an adult household member's Social Security number.

2. A Complete/Valid HSIS based on Participation in a Benefits Program → Requires the following five points (a-e) of information:

- a. The full name(s) of the enrolled eligible participant(s) [7 CFR Part 226.23(e)(1)(v)(A)];
- b. The appropriate SNAP (FoodShare Wisconsin), FDPIR, SSI, or Medicaid assistance number [7 CFR Part 226.23(e)(1)(v)(A)];
- c. The signature of an adult household member [7 CFR Part 226.23(e)(1)(iv)(B)];
- d. The signature date by the adult household member [7 CFR Part 226.23(f)]; and
- e. The Completed *For Center Use Only* portion by the DO → **All 3 sections including the *Effective Month of the Determination* box.**

3. Extended Benefits Program Eligibility:

If an eligible participant receives FoodShare Wisconsin or FDPIR, (s)he may be claimed as Free regardless of where he/she is residing (i.e. if the eligible participant moves to another household). That Free eligibility status extends to other eligible participants residing in the household as well; meaning all eligible participants in that household are also Free. Eligible participants with this extended Free eligibility retain their Free status when moving to a different household for the duration of their current HSIS determination.

→ However, eligible participants with Free eligibility status attained from their previous household who then move cannot extend this Free eligibility to the household members in their new household. The agency must record these eligible participants' extended eligibility status within the new household's eligibility documentation by clearly indicating that their eligibility status does not extend to any household members within the new household.

G. Determining Eligibility by Household Size and Income:

Household Size-Income Scale (July 1, 2016 - June 30, 2017)

A participant may be eligible as Free or Reduced depending on the household's size and total income reported on the HSIS if the information specified in section G3 below is provided on the HSIS form.

The household must fully complete Part 2 of the HSIS by listing the full names of all of the household members and all of each household member's current income received, by income source and frequency each income source is received. Then, an adult household member must complete Part 3 (*the Ethnicity and Race Data Collection section is optional*).

To determine the eligibility category (Free, Reduced, or Non-needy) of the enrolled eligible participants within the household, the DO must review the completed HSIS to identify the household size and calculate the total income. Then, (s)he must compare this information to the appropriate Income Eligibility Guidelines (IEGs) provided within the current Household Size-Income Scale (which is part of this guidance memorandum) for making the eligibility determination.

1. Calculating Household Income

Households may have income from different sources which are paid on different schedules. For example, the household may receive paychecks on a weekly basis and Social Security payments on a monthly basis. The following points (a and b) explain when conversion of income is required and how conversion is done.

a. No Conversion Required

If there is only one source of income or if all sources are received in the same frequency, no conversion is required.

The agency would just total all sources. For example, if a household reported receiving a monthly Social Security check and monthly private pension funds, those amounts would be added together; this total would then be compared to the appropriate IEG for monthly income for the household size.

b. Conversion Required

If there are multiple income sources with more than one frequency, the agency must annualize all income by multiplying:

- Weekly income by 52;
- Bi-weekly income (received every two weeks) by 26;
- Semi-monthly income (received twice a month) by 24;
- Monthly income by 12.

Do not round the values resulting from each conversion. Add all of the un-rounded converted dollar amounts and compare this un-rounded total to the appropriate IEG on the Household Size-Income Scale for annual income for the household size.

→ **Agencies *cannot* use conversion factors such as 4.33 to convert weekly income or 2.15 to convert bi-weekly income to monthly amounts.**

2. “Zero” or No Income:

Households seldom have “zero” or no income with none of the household members receiving benefits that would qualify the household automatically as Free. However, reporting “zero” or no income on the HSIS can be accepted for determining the household as Free.

A household may report that it currently earns “zero” or no income with no benefits in the following ways:

- a. Listing zero (“\$0”) income for all or some household members reported on the HSIS;
- b. Checking “no income” for all or some household members reported on the HSIS; or
- c. Leaving the income section in Part 2 of the HSIS completely blank. As of July 1, 2015, a blank income section on the HSIS can be accepted as a positive indication of no income and as the household’s certification that there is no household income to report.

All other required pieces of information must be provided by the household within Parts 2 and 3 of the HSIS form for determining the HSIS as Free (*with the Ethnicity and Race Data Collection section being optional*); this required information is as follows:

Full names of all household members; signature of an adult household member along with the signature date; and the last four digits of the signing household member’s social security number or an indication that (s)he does not have one.

→ **If the HSIS is missing any of this required information, the HSIS is considered incomplete and the eligible participants must be counted as Non-need**y until the household provides this missing information and then the HSIS is properly determined and approved by the DO.

Households submitting HSIS that indicate “zero” or no income and contain all of the other required information must be determined as Free; the Free determination is valid for the 13 month period as specified in section E, *Duration of HSIS Determinations*, above in this guidance memorandum.

**3. A Complete/Valid HSIS based on Household Size and Income →
Requires the following six points (a-f) of information:**

- a. Names of all household members including the name(s) of the eligible participant(s) [7 CFR Part 226.23(e)(1)(iii)(A)&(B)];
- b. The household income received by each household member identified by source and frequency or an indication of “zero” or no income [7 CFR Part 226.23(e)(1)(iii)(D)];
- c. The last four digits of the social security number of the adult household member signing the HSIS or an indication that he/she does not possess a social security number [7 CFR Part 226.23(e)(1)(iii)(C)];
- d. The signature of an adult household member [7 CFR Part 226.23(e)(1)(iii)(F)];
- e. The signature date by the adult household member [7 CFR Part 226.23(f)]; and
- f. The Completed *For Center Use Only* portion by the DO → **All 3 sections including the Effective Month of the Determination box.**

4. Definitions Relating to Household Size and Income:

a. The Terms Family and Household:

Family and household are used interchangeably. Program regulations define these as a group of related or unrelated individuals who are not residents of an institution or boarding house, but who are living as one economic unit. Within this definition, the term “household” is generally used for consistency.

b. Economic Unit:

An economic unit generally means a group of related or unrelated people who share all significant income and expenses of its members. Economic units are characterized by the sharing of expenses such as food, housing, medical, and household insurance expenses. More than one economic unit may live in the same house. Separate economic units living in the same house are characterized by prorating of expenses and economic independence from each other.

c. Income that must be reported on the HSIS

Income that must be reported on the HSIS are gross figures and any funds received on a recurring basis.

→ **Gross income** means money earned before deductions for income taxes, insurance premiums, bonds, garnishment, bankruptcy, etc.

→ **Self-employed individuals** should report net income, which is the gross receipt of income less operating expenses.

→ **Current income** means income received by the household for the current month (the month in which the HSIS is completed) or for the month prior to HSIS completion. If such income does not accurately reflect the household’s annual income, income may be based on the projected annual household income. If the prior year’s income provides an accurate reflection of the household’s current annual income, the prior year may be used as a base for the projected annual income.

Regular income that must be reported includes the following:

- Monetary compensation for services, including wages, salary, commission, or fees;
- Net income from nonfarm self-employment;
- Net income from farm self-employment;
- Social security;
- Dividends or interest on savings or bonds, IRA distributions, or income from estates or trusts;
- Net rental income;
- Public assistance or welfare payments;
- Unemployment compensation;
- Government, civilian employee, or military retirement or pensions, or Veterans' payments;
- Private pensions or annuities;
- Alimony or child support payments;
- Regular contributions from persons not living in the household;
- Net royalties; and

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- Other cash income such as amounts received or withdrawn from savings, investments, trust accounts or other resources that would be available to pay the price of an adult participant's meal.

d. Income not to be reported

- Any cash income or value of benefits from Federal Programs that must be excluded based on legislative prohibition:
 - Go to the following web link for an all-inclusive and current list of these Federal Programs: [List of Federal Programs Excluded based on Legislative Prohibition](#)
(This list is maintained by the Supplemental Security Income Program)

A few of these Federal Programs are as follows:

- Volunteering to provide services under programs authorized by the Domestic Volunteer Services Act of 1973, including (but not limited to):
 - The Foster Grandparents Program
 - Senior Companions Program
 - Benefits received under the National School Lunch Program and Child Nutrition Acts (CACFP)
- The value of in-kind compensation allowances, such as military base housing or other subsidized housing, medical, and dental services
- Student financial assistance, including grants and scholarships
- Loans (i.e. bank loans)
- Occasional earnings, including occasional (not recurring) payments received for odd jobs (i.e. babysitting, lawn mowing) and lump sum payments (i.e. bonuses)

H. Completion of the HSIS on Behalf of the Eligible Participant:

In most cases, eligible participants are able to complete their own HSIS form. An earnest effort must be made to have the adult participant, or an adult member within his/her household, complete a HSIS with his/her signature, even if the signature consists of the adult's own simplified "mark" in order to certify the furnishing of true information.

1. Completion by a Guardian or Power of Attorney:

If an eligible participant is not able to complete a HSIS with his/her signature, and his/her guardian or power of attorney completes and signs the HSIS on his/her behalf, the guardian or power of attorney must provide the last four digits of his/her social security number in place of the adult participant's social security number in the space provided on the HSIS.

2. Completion by a Center Representative:

If an eligible participant is not able to complete a HSIS with his/her signature, and no family member, guardian, or power of attorney is available to complete it for him/her, the center may complete the HSIS on the adult participant's behalf if (s)he is eligible as Free based on participation in a benefits program (see section F for *Determining Eligibility by Participation in a Benefits Program*). Then, the adult participant must have documentation on file at the center that verifies his/her eligibility in this specific benefits program.

I. Questionable HSIS:

The HSIS is a legal document; all information reported on the HSIS must be accurate and true. Reporting inaccurate or false information on the HSIS may result in prosecution under state and federal laws.

The adult household member who signs the HSIS certifies that all of the reported household information is true and correct and that all income is reported. Upon signature, this household member further certifies (s)he understands that the information provided on the HSIS is being given for the receipt of federal funds; that agency officials may verify the information on the form; and that deliberate misrepresentation of the information may subject him/her to prosecution under applicable state and federal laws.

→ **Agencies have an obligation to verify all questionable HSIS (“verification for cause”). If there is concern about the authenticity or correctness of the information provided on a HSIS, the agency, DPI, and/or USDA may, on a case by case basis, verify the HSIS for “cause” or request the household to submit verification documents supporting its listed information on the form.**

Please refer to the *Verification for Cause* section of the [USDA's Eligibility Manual for School Meals](#) for the required protocol in verifying a questionable HSIS for accuracy.

J. Household Size-Income Record (HSIR)

[Excel Version of Household Size-Income Record](#)

[Word Version of the Household Size-Income Record](#)

[Webcast Training on the Household Size Income Record](#)

All adult care centers must use the *Household Size-Income Record* form for documenting each eligible participant’s Free, Reduced, or Non-needy status each month based on his/her valid HSIS on file. This information must be used when compiling the monthly CACFP Reimbursement Claim.

→ **All enrolled eligible participants must be listed on the HSIR form. Ineligible adults (those who reside in CBRFs, Adult Family Homes, or nursing homes) must not be listed on the HSIR form.**

1. The Required HSIR Form

All agencies must use the HSIR form unless they have submitted their alternative form to DPI for approval. DPI approval of this alternative form must be granted prior to the agency using it to compile the enrollment data for their monthly CACFP Reimbursement Claim.

2. CACFP Enrollment Policy

All agencies are required to select their CACFP enrollment policy within the online CACFP contract for each site to define the specific time frame that eligible adults are considered enrolled when determining which of them will be marked as an eligibility on the HSIR each month. See *Guidance Memorandum 6A* for examples of CACFP enrollment policies that may be chosen by the agency.

3. Completing the HSIR

The HSIR must be completed according to the agency's chosen CACFP enrollment policy. All eligible adults enrolled at the center must be listed on the HSIR for the entire Federal Fiscal Year (October – September). When the adults are no longer considered as enrolled in accordance with the center's chosen CACFP enrollment policy, those adults' names must remain on the HSIR, but their eligibilities (Free, Reduced or Non-needy) should not be recorded starting the first full month of no longer being enrolled. Then, at the beginning of a new Federal Fiscal Year, when starting a new HSIR, eligible adults who are no longer enrolled should not be listed on the HSIR.

a. Directions to use the Excel spreadsheet version of the HSIR are as follows:

Record the eligibility category of each enrolled eligible participant for each month by typing in the appropriate "n", "r", or "f" **OR** an "x" within the appropriate column. If additional rows are needed, press on the row number (on the left-hand side) and select **Insert** and then **Rows** from the top menu.

b. Record Retention and availability of the agency's completed HSIR:

DPI recommends that agencies retain printed copies of each site's HSIR with the support documentation for each monthly claim. If agencies choose not to print their HSIRs for each monthly claim, they must be able and willing to print their HSIRs upon request by DPI or USDA for claim verification purposes.

→ **If agencies solely maintain their HSIRs electronically, safeguards must be in place to ensure that they can readily access these HSIRs and make them available upon request.** Refer to section K2b within this guidance memorandum for further instruction on storing records electronically.

4. Sponsoring Organizations:

A separate HSIR must be completed for each site to track its enrolled eligible adults each month.

- **When eligible adults attend more than one center within a given month**, they must be enrolled at each site and included on each of the attended sites' HSIRs. This is critical because claims may be rejected where attendance exceeds enrollment.

K. Record Maintenance and Retention Requirements:

1. Federal Regulations:

USDA regulations require that all CACFP records be retained and remain readily accessible for three years plus the current year based on the Federal Fiscal Year (October 1 to September 30) regardless whether they are retained in hard copy or electronic form. This record retention rule applies to collected HSIS regardless of eligibility determination, including those determined as Non-needy and for those eligible participants who are no longer enrolled.

2. Electronic Submission and Storage of HSIS:

a. Electronic Submission:

Agencies cannot require households to submit their completed HSIS electronically. They must make hard copies of the HSIS form available for completion.

i. Via Fax or Email:

At their discretion, agencies may permit households to electronically submit copies of their completed HSIS forms by email or fax under the following conditions:

- Upon request, the household will readily provide the original hard copy of the completed HSIS to the agency, DPI, and/or USDA;
- The submitted copy is legible when viewed electronically as well as by printed hard copy;
- The electronic format used by the household for transmitting the completed HSIS allows the agency (as well as DPI and/or USDA) to readily view and print the document;
- Transmission information including the date and time of the electronic transmission and the identity of the person transmitting the HSIS to the agency is available and retained on file; and
- All necessary safeguards are in place to prevent improper disclosure of the household's HSIS information. For example, the agency should only authorize staff who are responsible for the adult participant's eligibility information to receive or accept electronically submitted HSIS.

ii. Computer or Web-based Systems

→ **Agencies must request for and obtain DPI approval prior to implementing computer or web-based systems that serve to collect the required HSIS information.**

DPI and USDA does not endorse any specific software used for the collection and submission of HSIS information as well as making eligibility determinations. There are no Federal specifications for software vendors. Agencies are responsible for assuring that the software programs used for any automated processes is performing correctly and meets all requirements.

b. Electronic Storage:

Agencies choosing to store HSIS electronically **must ensure that their electronic storage systems sufficiently preserve and maintain these records so that they remain legible and readily accessible for the required retention period (three federal fiscal years plus the current year).**

→ **Written Policies and Procedures:**

DPI strongly advises agencies which store their records electronically have written policies and procedures that include the 11 points listed on page 2 of DPI's instruction resource:

[Electronic Storage of CACFP Records and Data - Policies and Procedures](#)