

Guidance Memorandum F: Financial Management Requirements CACFP FDCH Sponsoring Organization Requirements

Community Nutrition Programs
Child and Adult Care Food Program (CACFP)

Applies To: All Sponsoring Organizations of Family Day Care Homes

Revision Date: July 2015

Federal Regulations and Policies: [2 CFR 200](#); [7 CFR 226](#); [FNS Instruction 796-2 \(revision 4\)](#); [US Generally Accepted Accounting Procedures \(US GAAP\)](#); [Guidance Memo F](#)

Sponsors must maintain financial records to document the administrative costs and Program income reported each month. This requirement can be met by having separate CACFP accounting codes or by a separate bank account. Either a cash system, which recognizes revenues and costs when cash is actually received and expended, or an accrual system, which recognizes revenues and costs when incurred can be used.

The accounting system for CACFP Sponsors of family day care homes must:

1. Separate CACFP financial activities pertaining to day care homes from all other financial activities, including any CACFP activities pertaining to group child care centers;
2. Separate operational and administrative CACFP financial activities by month; and
3. Provide support documentation for all financial data submitted on monthly claims and quarterly financial reports.

Administrative Costs

All CACFP administrative costs must be actual, necessary, reasonable and have received prior approval from the Wisconsin Department of Public Instruction (DPI), through the budget process. Actual support documentation (receipts, invoices, timesheets, mileage logs, etc.) must be maintained to support the actual costs. Costs that are shared with other programs, such as rent or telephone, which cannot be specifically identified to CACFP administration, must be prorated on a consistent and rational basis in accordance with generally accepted accounting principles appropriate to the circumstances. Shared labor costs must be documented with daily time records to establish salary allocations.

Administrative costs must be offset by applicable credits, such as purchase discounts, rebates or allowances, recoveries or indemnities on losses, incidental services, receipts and adjustments of overpayments or erroneous charges.

Indirect cost rates must receive approval from the agency's federal or state cognizant agency. If the CACFP is the major funding source then the USDA is the federal cognizant agency. All indirect cost plans must follow federal management regulations outlined in 2 CFR 200. If an agency does not have an approved indirect cost rate the DPI can approve a de minimis rate of no more than 10% of the Modified Total Direct Cost (MTDC). The MTDC means all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel and up to the first \$25,000 of each subaward per §200.68. Subawards do not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program (i.e. Provider Reimbursement) per §200.92. All indirect cost plans must be submitted to the State Agency (DPI) along with written confirmation from the agency's outside auditor indicating the plan has been reviewed and approved by the audit firm. The DPI will forward all indirect cost rate proposals above the de minimis rate of 10% to the appropriate USDA office for approval.

Family Day Care Homes Sponsors can carryover a maximum of 10% of earned administrative reimbursement into the next federal fiscal year (FFY). These carryover funds become additional Program income to the next federal fiscal year and must be incorporated into the respective budget. All carryover funds must be expended by the end of the FFY. DPI strongly suggests using the First In First Out (FIFO) accounting method for use of these funds, in which these funds are used first for expenses of the new federal fiscal year. Any carryover funds in excess of the 10% or that are not used within the next federal fiscal year must be returned to the DPI.

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Standards for Allowable Costs (Effective April 2014)

Allowable costs are bona fide obligations of the institution incurred for the actual expenses of operating the program. Certain costs may be allowable for a public institution but unallowable for a private nonprofit institution and vice versa. Furthermore, subsequent events may result in the reclassification of costs from allowable to unallowable. In all cases, allowable costs require some level of State agency approval. For a quick reference, the [Summary of Allowable Costs \(revised 04/14\)](#) is an index of cost items from [FNS Instruction 796-2 \(revision 4\)](#) and the required approval level. As an additional reference, Exhibit I from 796-2 (rev. 4) has also been provided which outlines *Costs Requiring Additional Approvals*.

All cost items, illustrated in the [Summary of Allowable Costs](#) as requiring prior approval or specific prior written approval by DPI, cannot be claimed for administrative reimbursement, unless that approval has been given prior to the specific incurrence. All Family Day Care Home Sponsors participating in the CACFP are required to monitor budget vs. actual costs on a monthly basis, to ensure the proper approval has been obtained.

Typical Allowable CACFP Administrative Costs:

Salaries and Benefits of CACFP Employees	Purchase of Expendable and Nonexpendable Property ¹
Printing and Reproduction	Postage
Office Rent/Building Costs	Insurance
Advertising	Telephone and Other Communication Costs ²
Employee CACFP Travel Expenses	Training of Staff and Providers
Indirect Costs	Standard Bank Fees (including stop payment fees)
Contracted Services: Accounting; Audit; IT; Payroll/HR; Legal; Office Maintenance; Appeals/Hearing Official; Claims Processing	Professional Membership Dues or Subscriptions (Agency only)

¹ Nonexpendable personal property is all property with a useful life of more than 1 year and an acquisition cost of \$5,000 or more.

² Telephone and Other communication costs (i.e. internet access) is only allowable if the agency has a contract with the service provider. The cost of Individual or personal contracts are unallowable CACFP costs.

Typical Unallowable CACFP Administrative Costs:

Bad Debts	Non-program Legal Expenses
Contributions and Donations	Purchase of Real Estate
Fines and Penalties	Entertainment
Political Activities	Prior federal fiscal year expenditures

FNS has issued a helpful fact sheet entitled *Assessing Costs in the Child and Adult Care Food Program (CACFP)*. A copy of this fact sheet can be found at http://fns.dpi.wi.gov/sites/default/files/imce/fns/pdf/assessing_costs_cacfp.pdf

Amended Budgets (Effective October 2015)

The DPI Budget completed at the beginning of the program year should be a map of the projected expenditures that your agency anticipates on incurring throughout the year. DPI expects situations may arise that will require you to amend your budget. Amendments to the current federal fiscal year budget will be accepted at any time prior to September 1st of that federal fiscal year. Any budget amendment after September 1st, will be accepted for emergency situations only.

A request for an amended budget must be in writing (except in the case of an emergency, then verbal communication will be accepted) and submitted via the online contract. An email should be sent to the CNT Auditor notifying of the submitted amendment. DPI will respond within 30 business days of receiving a complete budget amendment. A complete budget amendment request must contain: (1) the specific cost item(s) that is being amended (highlighted on the uploaded amended Attachment E), (2) the projected dollar amount that is being changed, (3) the source of funding that will cover the costs (i.e. additional administrative reimbursement, lowering the dollar amount for a different line item, other source of funding, etc.); (4) support documents uploaded to the online application; and (5)

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the figures on the online *Budget Summary* page match those that are figured in the uploaded amended Attachment E. Approval will be granted through the online application process.

No budget amendment for cost items requiring Prior Approval or Specific Prior Written Approval, as illustrated on the [Summary of Allowable Costs](#), will be approved **after** a cost has been incurred. The budget does not need to be amended to reflect any change/addition of a Generally Allowable Cost, unless the addition will increase the overall budget amount. In this situation, simply notify the DPI auditor via email that the agency's overall budget amount will be increased, the reason for the increase (i.e. increase in the number of homes originally projected), and certify that the agency is planning to spend the extra admin on generally allowable costs (i.e. purchase of office supplies, printing supplies, more monitoring visits).

CACFP Quarterly Financial Report for Sponsoring Organizations of Homes (Eff. March 2015)

Sponsors must submit, on a **quarterly** basis, the *Quarterly Financial Report for Sponsoring Organizations of Homes*. This report is to be submitted **online**. Instructions for submitting your quarterly financial report are contained on the Guidance Memo website entitled *CACFP Sponsors of Family Day Care Homes: Revised CACFP Quarterly Financial Report*. The report should document all revenue and costs to the food service program, including carryover funds, on an accrual basis (as they were incurred not when they were paid/received). The *CACFP Quarterly Financial Report for Sponsoring Organizations of Family Day Care Homes* (PI-1463-B) form can also be found on the Guidance Memo website http://fns.dpi.wi.gov/fns_homememos and should be completed as a worksheet to enter figures online and retained on-site for agency records. **A PAPER COPY OF THE REPORT SHOULD NOT BE SENT TO DPI.** The deadlines for submitting these financial reports are as follows:

<u>Time Reporting Period</u>	<u>Quarterly Finance Report due to DPI</u>
October 1 – December 31	March 1
January 1 – March 31	June 1
April 1 – June 30	September 1
July 1 – September 30	December 1

Operational Payments

A Sponsor must disburse any reimbursement payments for food service due to each day care home within five (5) working days of receipt from the DPI. The full amount of food service payments must be disbursed to each day care home on the basis of the number of reimbursable meals and snacks served to enrolled and participating children. In certain cases, the Sponsor may reduce or increase the amount of the facility's payment. These cases are limited to the guidelines found in FNS Instruction 796-2 (rev. 4) Part IX B(3)(c).

Reimbursement payments to each day care home **must** be payable to an individual provider, not the name of the family day care home, nor to more than one provider. The provider enrollment data (as documented on Application - Day Care Home - PI-1472, Rev. 04-10) must correspond to that on file with the Sponsor, and must be kept current by the Sponsor as reported to our office. (See Guidance Memo A)

Recovery of Overpayments to Providers

An overpayment (overclaim) is defined as a provider's submitted claim for reimbursement which the Sponsor has determined to be invalid (whole or in part) due to reporting of false or erroneous information. This situation is usually the result of a Household Contact (i.e. parent audit) or other information received after the claim has been processed and payment has been issued to the provider. Other situations may be the result of a "human" error made, either by the Sponsor or the Provider. In any situation resulting in an overpayment to the provider, in where the provider was at fault, these funds must be recovered from the provider and the overpayment amount must be returned to the DPI. Errors made as a result of the Sponsor not maintaining the proper edit checks are the responsibility of the Sponsor to repay.

Once a Sponsor identifies that a provider has claimed in error, the Sponsor must send notification of the overclaim amount to the provider. The notification must include the basis for the action (i.e. result of household contact, on-site review, etc.), the claim(s) that was effected, the amount of the reimbursement that needs to be recovered, and the method of payment (check or deduction from a future valid claim). **Under no circumstances must a Sponsor self-correct a provider meal reimbursement claim, by deducting the erroneous meals from a future valid claim.**

CACFP regulations [7 CFR 226.13(c) and 226.18(b)(7)] state that Sponsors of family day care homes must disburse the full amount of food service payments to providers. **The Sponsor must not withhold Program payments to any family day care home for any other reason**, except when the Sponsor has reason to believe that a claim (whole or

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in part) is invalid due to the provider having submitted false or erroneous information. This will ensure that the claim figures that the Sponsor is reporting to DPI, and eventually DPI to USDA, are a true and accurate reflection of the performance of the providers.

Documentation of the meals being denied must be maintained on file by the Sponsor, utilizing the *Provider Meal Reimbursement Refund Check Detail (Attachment 1)* of this guidance memorandum and reported to DPI on a quarterly basis. All provider reimbursement that is collected by a Sponsor must be returned to the DPI at the end of each federal fiscal quarter (December 31, March 31, June 30, and September 30). The reimbursement check must be from the Sponsor and be made payable to the Department of Public Instruction. The reimbursement check must reflect the total of all provider meal reimbursement(s) recovered from provider claims paid in error for the given fiscal quarter and correspond to the completed *Provider Meal Reimbursement Refund Check Detail (Attachment 1)*. The form and the reimbursement check should be sent to *Wisconsin Department of Public Instruction, Attn: Debra Anklam – Business Office, PO Box 7841, Madison, WI 53707-7841*. A copy of the form should be sent (via e-mail) to Cari Ann Muggenburg.

Please note: When completing the *Provider Meal Reimbursement Refund Check Detail (Attachment 1)*, ensure that the information entered is in order by **Claim Date**. Only one check and one form (unless more space is needed) should be submitted per quarter.

Outstanding Provider Checks

Sponsors are required to have a check register and payment log for all meal reimbursement payments made to providers. A reconciliation of the provider payments should be done on a monthly basis with the bank statements that are received for the account. Any discrepancies should be investigated with the effort and result documented. At the very least, the Sponsor should contact any provider who has not cashed their meal reimbursement check within 45 days from the date the check was issued to determine the reason. If the provider has lost their check, the Sponsor should make immediate arrangements to replace the lost meal reimbursement check, including placing a stop payment on the lost check, if applicable, and reissuing a new meal reimbursement check.

Tracking Report of Outstanding Provider Payments

Each Sponsor must submit, to the DPI, within 90 days of the end of the federal fiscal year, a completed *Outstanding Provider Check Tracking Report – Summary and Detail (Attachment 2)*. This report will list all provider payments from the recently completed fiscal year that have still not been cashed by the provider and have not been resolved or replaced by the Sponsor. A copy of the *Outstanding Provider Check Tracking Report – Summary and Detail (Attachment 2)* is required to be sent along with a check in the total amount of outstanding checks collected at the end of the program year. The reimbursement check **must** be made payable to the **Department of Public Instruction**. The check and the completed *Attachment 2* must be sent to: *Wisconsin Department of Public Instruction, Attn: Debra Anklam, DPI Business Office, 125 South Webster Street, P.O. Box 7841, Madison, WI. 53707-7841*.

If a provider requests repayment of a lost meal reimbursement check after the unresolved balance has been returned to DPI, the Sponsor is required to reimburse the provider for the lost payment. The Provider must make the request, in writing, to the Sponsor for a replacement payment indicating the reason for repayment. The Sponsor must then submit to DPI a request, in writing, for a replacement payment. To make a request for a replacement payment from DPI, the Sponsor must submit the following to the Community Nutrition Auditor, Cari Ann Muggenburg, for approval:

1. A copy of the written request for a replacement check submitted by the Provider to the Sponsor.
2. A copy of the original *Outstanding Provider Check Tracking Report – Summary and Detail (Attachment 2)* that was submitted with the funds related to the provider payments. The payment that is to be replaced should be highlighted.
3. A completed paper claim form (PI-1452) found in Guidance Memo N that corresponds to the requested payment. The word “Amended” should be written at the top of the claim form and should be completed for the claim month the provider payment was originally paid.

Record Retention

Accounting records and documentation for program revenues and costs must be retained for three years plus the current year to which they apply. For instance, the 2015-2016 federal fiscal year food service records must be retained until October 1, 2019.

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Interest-Earning Accounts (Effective July 2015)

Sponsors are permitted to use interest-earning accounts for both operational and administrative funds. Interest earned on Federal funds in the amount of \$500 may be retained for administrative CACFP expenses. In accordance with 2 CFR 200, any additional interest earned on Federal advance payments must be remitted annually to the Department of Health and Human Services. Details on the payback can be found under 2 CFR 200.305.

Audit Requirements (Effective December 26, 2014)

The Code of Federal Regulations, Title 2-Agriculture, Part 200 (2 CFR Part 200) establishes audit requirements. Specifically, Subpart F- Audit Requirements requires an annual single or program audit if nonfederal entities, with a fiscal year beginning on or after December 26, 2014, expend \$750,000 or more in a year in total federal awards (this amount is \$500,000 for agencies with a fiscal year beginning on or before December 26, 2014 until the next fiscal year). The audit threshold applies to all federal grant awards combined.

Copies of all completed single audit reports are required to be submitted to the Federal Audit Clearing House. A copy, of the last completed, single audit report must be uploaded into the online application. If you have any question please do not hesitate to contact Cari Muggenburg at cari.muggenburg@dpi.wi.gov.

Fiscal Action Procedures

Fiscal action can be taken on any agency that fails to comply with the regulatory requirements for participation in the Child and Adult Care Food Program. An overclaim can be assessed on an agency as a result of a program review, financial audit (including but not limited to a Single Audit, LAB audit or desk audit), or a federal audit (i.e. OIG audit).

Federal regulation allows a disregard threshold, currently \$600.00 for overpayments to child or adult care institutions participating in the Child and Adult Care Food Program (CACFP). A disregard threshold in the amount of \$600.00 will be placed on any operational (provider reimbursement) overclaim notice assessed as a result of a program review or audit. *However, no overpayment will be disregarded where there is substantial evidence of violations of criminal law or civil fraud statutes, or for any administrative overclaim or disallowed administrative expense.*

If your agency incurs a fiscal overclaim, greater than \$600.00 in provider reimbursement or for any dollar amount of administrative reimbursement, the entire debt must be repaid in full within 30 days from the date of the *Overclaim Notice*. All overclaim payments are required to be submitted by check for the full amount of the overclaim. The check should be made payable to the *Department of Public Instruction* and mailed to the following address: Department of Public Instruction, Attention: Deb Anklam, PO Box 7841, Madison, WI, 53707-7841.

Payment is due in full within 30 days from the date of the *Overclaim Notice* letter. If not paid in full within 30 days, interest at the rate of 1.000% per year will be charged on any overclaim balance in excess of \$5.00, beginning with the date of the *Overclaim Notice* letter. If you appeal the payment demand, we will stop all collection activities, however, interest will continue to accrue. If the hearing officer upholds our demand for payment, you will owe the total balance of the overclaim and the interest that has accrued. If the hearing officer does not uphold our decision or reduces the amount of our repayment demand, any interest that has accrued on the overclaim amount, no longer due, will be waived. Collection activity will resume after the hearing officer issues a decision on your appeal.

If your agency disagrees with any of the findings that resulted in the fiscal overclaim, your agency may appeal our determination of the fiscal action, in accordance with CACFP regulation 7 CFR 226.6(k). A copy of the appeal procedure is enclosed. **The *Appeal Request Form (PI-1453)* must be filed in writing and postmarked within 15 calendar days from the date you receive this letter.** The appeal should be addressed to: *Department of Public Instruction, Community Nutrition Programs, Attention: Cari Ann Muggenburg, P.O. Box 7841, Madison, WI. 53707-7841.* If you decide to appeal the overclaim, all appeal procedures must be followed as failure to do so may result in the denial of your request for an appeal.

Payment of an administrative overclaim and an overclaim in provider reimbursement that was due to an error of the Sponsoring Organization must be paid using **non-CACFP** funds. Any overclaim in provider reimbursement that was the result of a provider error must be paid by following the above procedures for *Recovery of Provider claims paid in error.*