

# Guidance Memorandum L (Family Day Care Home Sponsors)

# **Infant Requirements**

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Terms to Know:	
Infant:	A child from birth through 11 months old (less than one year of age)
IFIF:	Iron-fortified Infant Formula
IFIC:	Iron-fortified Infant Cereal

#### **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 most infants in care.
- Creditable, developmentally appropriate infant foods

Providers must offer to supply infant formula and foods even when they choose to not claim infant meals for CACFP reimbursement. Providers cannot avoid this requirement by stating infants are not "enrolled" in the CACFP, or by citing administrative or cost barriers to offering infant meals.

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.

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#### **IFIF and Foods On-Hand:**

The provider must always have enough IFIF and foods on-hand to serve meals according to each infant's developmental readiness and feeding schedule, regardless of whether the family or provider supplies the infant's IFIF, breast milk, and/or foods.

If families choose to supply breast milk, IFIF, and/or foods for their infant while in care, the provider and families must agree to a contingency plan that will be followed when the infant's IFIF, breast milk, and/or food supply runs out. The contingency plan must ensure that the infant's feeding schedule is not interrupted while the infant is in care. Some examples of a reasonable plan may be that the provider:

- Always keeps their own purchased IFIF and foods on-hand as back-up for the infant
- Makes a quick run to purchase the needed supplies at the nearest store
- Contacts the family to bring in more supplies before the infant's next feeding.

#### **Infant Meal Notification Requirement:**

Providers must inform families, in writing, of the type of IFIF and foods they supply for infant meals while in care.

Sponsors must require their enrolled providers to meet this notification requirement by using one of two methods (1 or 2):

#### The Sponsor's CACFP Enrollment Form or Infant Meal Notification Form (Method 1)

All WI FDCH sponsors have historically required providers to use this infant meal notification method.

The sponsor's CACFP Enrollment Form either has an infant meal notification section or they use a separate Infant Meal Notification Form for meeting the infant meal notification requirement.

Using either form as specified by the sponsor, providers must inform their families of the type of IFIF that they supply and that they supply all foods for serving meals in accordance with the Infant Meal Pattern requirements. Then, the family selects, on the form, whether they accept the provider-supplied IFIF and/or infant foods **or** that they will supply their own IFIF/breast milk and/or foods for their infant.

OR

#### DPI's Infant Menu Template/Infant Meal Pattern (Method 2) - Newer Method

This method requires the provider to complete the <u>Infant Menu</u> template and then to post and/or distribute their completed Infant Menu and the <u>Infant Meal Pattern</u> chart together:

- > When posting them, they must be placed in a visible location upon entering the home.
- When distributing copies, each family enrolling their infants must receive a copy of both the completed Infant Menu and the Infant Meal Pattern chart together.

Go to <u>CACFP Translated Docs</u> for Spanish and Hmong versions of the documents.

Also refer to the <u>FDCH CACFP Infant Recordkeeping Requirements Handout</u> for instructions on meeting the infant meal notification requirement by using this method.

#### **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.

- <u>Infant Meal Pattern and Grains Chart:</u> Required food components and minimum serving sizes for meals/snacks
- <u>CACFP E-Learning Course</u>: Infant Meal Pattern lesson reviews meal pattern requirements

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#### **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 <a href="Developmental Readiness">Developmental Readiness</a> handout for more information.

#### **Food Components**

#### **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. For more information on how to promote breastfeeding, refer to the <u>Ten Steps for Breastfeeding Friendly Child Care Centers Toolkit</u>.

#### <u>Iron-Fortified Infant Formula (IFIF)</u>

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.

The FDA defines IFIF as containing 1 milligram (mg) or more of iron per 100 kilocalories when prepared according to the manufacturer's directions. The mg of iron is found on the Nutrition Facts Label.

#### **NON-CREDITABLE Infant Formulas:**

- 1. Low-iron Infant Formulas: formulas labeled as low-iron (or have less than 1 mg iron per 100 kcals)
- 2. FDA Exempt Infant Formulas: formulated for infants with inborn errors of metabolism, low birth weight, or unusual medical or dietary problems. For more information: <u>List of Exempt Formulas</u>
- 3. Serving Formula to Infants 13 Months or Older: IFIF is creditable if served to infants until 13 months of age as long as it is served as part of the weaning process from formula to cow's milk. While weaning, infants should be provided both formula and cow's milk at the same meal service to gradually encourage an infant's acceptance of cow's milk. IFIF served to infants over 13 months of age is not creditable.

To serve non-creditable infant formulas, a valid medical statement must be on file. Refer to the <u>Special Dietary Needs and the CACFP</u> for more information.

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#### **Infant Foods**

Foods creditable to the infant meal pattern include homemade baby food, table food, and certain store-bought jarred and packaged baby food. An overview of these types of foods is provided below. The <u>Crediting Infant Foods</u> and <u>Foods for Infants</u> resources provide a detailed list of creditable and non-creditable foods.

- **Homemade Baby Foods:** Whole fruits, vegetables, and meat/meat alternates may be pureed, ground or mashed to the appropriate size and texture. <u>Homemade Baby Food</u> provides information for how to prepare homemade baby food.
- 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
  - o Meats: Must be single meats or poultry; gravy and broth are ok

#### **NON-CREDITABLE Store-bought Baby Foods:**

- 1. Dry infant cereal containing fruit (e.g., infant cereal with apples)
- 2. Jarred or packaged purees (e.g., fruit and yogurt purees,)
- 3. Freeze-dried fruit yogurt snacks (yogurt melts)
- 4. Infant combination dinners, entrees, or meals with multiple component ingredients (ex. turkey rice dinner or chicken noodle dinner) unless the product's label includes volume information that credits one or more food components

View the Creditable Infant Foods lesson in the <u>CACFP E-Learning Course</u> for more information.

#### Allergen Foods

Foods that contain one or more of the nine major food allergens identified by the FDA (milk, egg, fish, shellfish, tree nuts, peanuts, sesame seeds, wheat, and soybeans) are appropriate for infants and can be part of a reimbursable meal. The American Academy of Pediatrics states there is no current convincing evidence that delaying the introduction of allergen foods influences the development of food allergies. Consult with families to learn about any concerns of possible allergies and their preference on how solid foods are introduced.

#### SERVING AND CLAIMING CREDITABLE INFANT MEALS

To claim meals and snacks served to an infant:

- IFIF and foods must be creditable to the meal pattern, regardless of whether they are family or provider supplied
- Meals must meet infant meal pattern requirements according to the infant's developmental readiness
- All required components of the meal are offered during a timeframe consistent with the infant's schedule (i.e., formula at 9 AM, IFIC at 9:30 AM). Foods do not have to be served at the same time.

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- The provider must supply all components or all but one component: The CACFP allows families to provide only <u>one</u> component for a meal or snack that is claimed. If families provide more than one component, the meal cannot be claimed.
- Provider's Own Infant:

A provider may claim their own infant's meals for CACFP reimbursement when:

- The criteria for claiming infant meals, as listed directly above, is met;
- o They feed their infants during child care;
- o Their household is Tier I eligible based on income or Benefits Program participation; AND
- o Another non-residential child is present for meals they have fed their infant

#### **Breastmilk and Iron-Fortified Infant Formula (IFIF)**

Breastmilk and/or IFIF are a required component at all meals and snacks. They are considered one component.

- When breastmilk and/or formula is the only component served at a meal or snack, the meal is creditable and can be claimed. This includes when the family declines the provider-supplied infant formula and supplies a different formula, or when the family provides breastmilk and supplements formula.
- Breastmilk is creditable when:
  - o It has been expressed and is served to the infant in a bottle, and/or the mother breastfeeds her infant in the home while in the provider's care
  - The provider and/or licensed provider's assistant breastfeeds their enrolled infant in the home during work hours, a work break, and off-work hours if the infant is enrolled and while signed in for care
    - (See the section <u>Serving and claiming Creditable Infant Meals</u>, above, for when the provider may claim their own infant's meals.)
- Less than the minimum required amount of breastmilk may be offered when additional breastmilk or infant formula is available and offered to the infant when hungry.

#### **Foods**

Foods are required to be served once the infant has started to eat them and must be offered according to the infant's eating habits, **regardless of age.** 

#### **Provider-Supplied and Family-Supplied Components**

When an infant is drinking breastmilk/formula and eating one or more foods at a meal or snack:

- Meals can be claimed when the provider supplies all, or all but one, component. Examples:
  - o Family supplies breastmilk/formula and the provider supplies all foods
  - o Provider supplies formula, fruits and vegetables, and the family supplies infant cereal
- Meals cannot be claimed when the family supplies two or more components. Examples:
  - Family supplies breastmilk and infant cereal, and the provider supplies fruits and vegetables
  - o Provider supplies formula and the family supplies fruits, vegetables and infant cereal

Providers may not be able to claim all meals and snacks served each day depending on who supplies the components at each meal/snack. For example, a breakfast and lunch served to an infant that includes breastmilk and family-supplied foods cannot be claimed; however, a snack served to this same infant that includes breastmilk and provider-supplied crackers can be claimed.

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#### **RECORDING INFANT MEALS TO CLAIM**

Sponsors must require providers to record infant meals by one of two methods (A or B):

#### <u>Infant Menu Records (Method A)</u>

All WI FDCH sponsors have historically required providers to use this method to claim infant meals.

This method requires providers to record individual infant menu records (typically grouped by age) by listing the specific items served for each component and the infants who were served each of these respective meals. The provider must submit their completed infant menu records to the sponsor as part of their monthly claim. Based on review of the provider's submitted infant menu records, the sponsor must only reimburse the provider for infant meals showing that all required components were served.

#### **Documentation of Provider/Family Supplied Components:**

Once infants are eating foods, the provider must only claim infant meals for which all components are supplied by them or have only one family-supplied component. Sponsors must not reimburse providers for infant meals that served more than one family-supplied component.

Sponsors should specify how and where their providers are to identify who supplies each component of for each infant's meals. Examples:

- On their handwritten menus or on the Claim Information Form (CIF) (if claim by paper)
- Within the 'Remarks' or 'Comment' fields (if claiming on-line)
- Via email
- By completing <u>DPI's CACFP Infant Meal Components Form</u> for each infant (see <u>Method B</u> below)

# <u>DPI's CACFP Infant Meal Components Form/Sponsor's Meal Count Form (Method B)</u> [Newer Method]

This method requires providers to complete the <u>DPI's CACFP Infant Meal Components Form</u> (or other DPI-approved infant form) along with the sponsor's meal count form for each infant's meals.

If using these two forms to document infant meals, the Infant Menu Record Form described above for Method A is not required.

#### Completing the DPI's CACFP Infant Meal Components Form

If using this method, providers complete a meal components chart for each infant during the calendar month.

The following instructions are provided on the form:

At the beginning of the month, providers must record the meal components each infant is currently eating and whether it is supplied by the provider or family. Then, during the month if an infant becomes developmentally ready to start eating additional meal components and/or the supplier of the component changes (ex. family-supplied IFIF changes to provider-supplied IFIF later during the month), the provider must record the date on which this addition or change started and who supplies the specific meal component.

#### Completing the Sponsor's Meal Count Form

Providers must record each infant (by full name or assigned number) served at each meal by the end of the day when the infant meal served creditable items for the required meal components, all of which are supplied by the provider or have only one family-supplied component.

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#### Providers must not record a meal count for an infant when the meal:

- Did not serve creditable items for the required meal components (in accordance with the infant's developmental readiness see <a href="Infant Meal Pattern section">Infant Meal Pattern section</a> above for more information)
- Contained more than one family-supplied component

Both forms must be kept on file to support the monthly claim.

➤ Also refer to the <u>FDCH CACFP Infant Recordkeeping Requirements Handout</u> for instructions on using this method (<u>Method B</u>).

The <u>FDCH CACFP Infant Recordkeeping Requirements Handout</u> provides instructions on using the newer methods to meet the infant requirements, as detailed within this guidance memo: Method 2 for meeting the infant meal notification requirement and Method B for using <u>DPI's CACFP Infant Meal Components Form</u> to claim infant meals

### MONITORING INFANT MEALS WITH FAMILY-SUPPLIED COMPONENTS

Sponsors must monitor provider/family-supplied components as part of the home visit's infant review component.

#### **Monitoring at the Home Visit Level:**

**During each home visit**, the monitor must determine what the provider is actually serving to each enrolled infant for assessing whether the provider is in compliance by:

- Recording all items served to each infant on their submitted claims;
- Serving items that are creditable to the infant meal pattern;
- Serving items appropriate to each infant's developmental readiness; and
- Claiming infant meals that served no more than one family-supplied component

In order adequately assess the provider's compliance with the infant meal requirements, the monitor must complete the following two checkpoints at every home visit:

- 1. See infant formula/breast milk and foods on-hand:
  - To know what each infant is being served for meals, the monitor must physically check the foods and formulas/breast milk on-hand during the home visit by asking the provider to show them the infant supplies on-hand for what each enrolled infant is currently eating and whether the provider or family supplies these items.
  - As part of this observation, the monitor should also take note of the provider feeding their enrolled infants, **if they feed their infants** during the home visit.

#### AND

Cross-compare items on-hand to infant meal records:
The monitor must compare this information to the provider's infant meal records for infant meals claimed.

#### **Required Action for Non-compliance:**

The monitor must:

- Disallow infant meals that served non-creditable foods/formula, were missing required components in accordance with each infant's developmental readiness, and/or contained more than one family-supplied component
- Document the specific non-compliance within the provider's home visit report/form
- Require the provider to correct the non-compliance; and
- Inform the office of the non-reimbursable infant meals identified during the home visit to ensure these meals are properly disallowed on that respective month's claim as well as on future claims if improperly reported by the provider.

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#### **Monitoring at the Monthly Claim Level:**

Sponsors currently have discretion in whether they systematically review provider-supplied versus family-supplied component information for all claimed infant meals at the monthly claim level, as part of the menu review and claims processing procedure. Claim level oversight will more consistently prevent CACFP reimbursement payments for infant meals containing more than one family-supplied component.

Monitoring at the monthly claim level requires cross-checking provider/family-supplied component information as part of the monthly menu review procedure when preparing to process claims. Sponsor staff compare the provider/family-supplied documentation submitted by the provider for each infant to the infant meals claimed. Based on this comparison, the sponsor disallows reimbursement for infant meals containing more than one family-supplied component.

➤ Refer to the <u>Recording Infant Meals to Claim section</u> of this guidance memo on documentation methods of each infant's provider/family-supplied component information.

#### USDA'S Feeding Infants in the Child and Adult Care Food Program

This guide provides information on the CACFP infant meal pattern requirements as well as best practices for infant feeding, including information on the infant meal pattern, creditable foods, developmental readiness for solid foods, hunger/fullness signs; and handling/storing breastmilk and infant formula.

Spanish and printed versions are also available to be ordered or downloaded.

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