# Guidance Memorandum O Child Enrollment (FDCH Sponsors)

#### **TABLE OF CONTENTS**

CACFP ENROLLMENT REQUIREMENTS	1
Equal Access to Meals	
Non-Participating Children	1
Enrollment Forms - Decline Statements / Non-Participating Options	1
CHILD ENROLLMENT INFORMATION	2
Required Enrollment Information for Each Child	2
Annual Updates	2
Record Retention of Enrollment Forms	2
Normal Days, Hours, and Meals Information	2

#### **CACFP ENROLLMENT REQUIREMENTS**

Family day care home (FDCH) providers must enroll all children in the Child and Adult Care Food Program (CACFP) who are enrolled in their childcare. This includes all non-residential children (regardless of being related) and provider's own children when eligible.

### **Equal Access to Meals**

Not enrolling all children in the CACFP is considered discrimination by denying equal access to meals. The following are examples of denying equal access to meals:

- Not enrolling children for whom the provider considers to be "drop-in" DCF licensing and certification rules have no definition for "drop-in" children and make no exceptions for "drop-in" situations.
- Not enrolling infants:
  - o to avoid the requirement of offering formula and infant foods for their enrolled infants
  - Whose families choose to supply all foods and formula/breast milk
- Not enrolling children with special dietary needs (SDN):
  - o Whose SDN is disability-related -- providers must offer to accommodate the child's SDN
  - Whose families choose to supply their children's meals

#### **Non-Participating Children**

A child may only be considered as a non-participant when the family has submitted a separate, written request to not enroll their child in the CACFP and that they instead prefer providing meals for their child while in the provider's care. This written statement must be retained on file by the sponsor.

#### Enrollment Forms - Decline Statements / Non-Participating Options

Many software programs' enrollment forms used by sponsors include an option for families to indicate their child is "non-participating" for declining their CACFP participation.

If the sponsor's enrollment form has a non-participating option, they must run a monthly database query for any child whose parents chose to indicate they are not participating in the CACFP. The sponsor must contact each of these families to check whether they intended to select this option. If the family selected this option for its intended purpose and not because of a clerical error or misunderstanding, they must submit a written request as specified above in the Non-Participating Children section. The sponsor must retain their monthly query reports and documentation of their family contacts.

Revision Date: 8/2021 Page 1 of 2

## **Guidance Memorandum O** Child Enrollment (FDCH Sponsors)

#### CHILD ENROLLMENT INFORMATION

The provider must submit to the sponsor a complete enrollment form signed and dated by the family for each child. The sponsor must not reimburse providers for meals served to children without current and complete enrollment forms.

FDCH sponsors may reimburse providers for meals served to newly enrolled children and children whose annually updated enrollment information is due back to the first of the month if receiving the completed or updated enrollment forms before processing that month's claim.

Sponsors may use the DPI <u>CACFP Enrollment Form</u>, their own form, or a combination of forms to collect the required enrollment information.

#### **Required Enrollment Information for Each Child**

- full name, home address, and telephone number (must always be kept current)
- Normal days and hours in care and the meals normally received while in care, including hours in care both before and after school (must be updated annually)

### **Annual Updates**

Days, hours, and meals information on a child's enrollment form is valid for a 13-month period, starting the month the family signed it to the same month a year later. Changes to a child's name, home address, and telephone number must be updated as they happen.

The provider must request families to update and sign or initial and date their child's enrollment information each year and then submit the signed, updated enrollment information to the sponsor to continue receiving meal reimbursement for each child.

#### **Record Retention of Enrollment Forms**

Both providers and sponsors must retain the children's enrollment forms on file in accordance with USDA's record retention rule explained in <u>Guidance Memorandum (GM) K – Recordkeeping</u> Requirements.

#### **FDCH Sponsors:**

Sponsors must retain signed copies of all children's original and annually updated enrollment forms to support payment for meals served to enrolled children.

#### **Providers:**

Providers must have hard copies of their children's signed enrollment forms available on-site for review during home visits.

This is unless they maintain this information on the sponsor's online system **and** can rely on their electronic device for availability during home visits.

#### Normal Days, Hours, and Meals Information

Sponsors are to use the normal days, hours, and meals information provided on the children's enrollment forms when completing the five-day reconciliation during home visits. It may also be used for meal comparison beyond the five-day reconciliation to justify further investigation, i.e. more detailed claim verification, completing household contacts, follow-up home visits, etc.

This information must only be **updated annually** by the families. Monitors are to note on their home visit forms any changes to children's schedules resulting in discrepancies within the five-day reconciliation. Because this information is most likely not current, it should not solely justify meal deductions.

➤ Refer to the <u>Five-Day Reconciliation Procedure - Family Day Care Home Visits</u> under <u>GM D - FDCH Monitoring Requirements</u> for more information on the reconciliation process.

Revision Date: 8/2021 Page 2 of 2