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

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

Applies To: All Participating Agencies in the Child Care, At-Risk Afterschool Program and Emergency Shelter Components

Child Care Agencies include Group Child Care Centers, Head Start Centers, and Outside of School Hours Care Centers

Both Independent Agencies (1 site) and Sponsoring Organizations (>1 site)

Guidance Memorandum 9C details the administrative and recordkeeping requirements for all Child Care, At-Risk Afterschool Program and Emergency Shelter agencies participating in the CACFP. It includes instructions and forms to use for meeting these requirements. Additional resources are referenced for providing more detail in the specified areas. Webcast trainings and complimentary handouts are also referenced for further review of the requirements.

All CACFP records must be retained on file by your agency and be readily available for review by DPI, USDA, or other state officials for at least three Federal Fiscal Years (FFY) years plus the current FFY, except when audit findings have not been resolved; the records must then be retained as long as required for resolution of the issues raised by the audit.

9.1 CACFP Contract and Agreement

Contract Changes

It is critical to notify your agency’s assigned consultant at DPI of any changes to its contract information throughout the year.

Your agency must immediately submit its amended online contract for DPI approval when the following changes occur within your agency:

[CACFP Nutrition Program Consultants](#)

- Ownership
- Name of the Agency
- Federal Employer Identification Number (FEIN)
- Business Structure
- Site Location
- Authorized Representative (including email address and phone number)
- Board President
- Board Member changes that compromise its independent governing board status
- Type of Meal Preparation
- Change in Food Service Vendor
- DCF Child Care License Changes:
 - Capacity Changes
 - Days and Times of Operation
 - Ages of Children/Youths
 - Regular License Status from Provisional Status (Expiration Date)
- Adding Meal Types Served

Failure to submit these changes within your agency's contract and receive DPI approval for them in a timely manner could result in disallowance of your agency's meal payments and/or your agency having to remit CACFP funds.

Instructions are provided within the *Child and Adult Care Food Program Contract Manual* for making changes (amendments) to the contract.

[CACFP Contract Manual](#)
[Checklist of Required Documents](#)

CACFP Permanent Agreement/Policy Statement (PI-1486-AP)

Your agency's signed and approved copy **must remain permanently on file** beyond the three year retention rule.

Approved CACFP Contract

DPI advises to print and retain a copy of your agency's approved CACFP contract, including the Site Application and Site Meal Information pages for each site, the uploads to the contract, and any subsequent approved contract changes.

All Non-Profit Agencies and Any For-Profit Agencies with Governing Boards

An acceptable independent board of directors consists of a majority of voting members who are not family-related to each other as well as to staff listed on the *Staffing Personnel* page of the agency's CACFP contract **and** whose livelihood is independent from and who hold no personal financial interest in the agency's activities. *A majority is defined as 50 percent or greater of the total number of voting board members.*

The agency must maintain an independent governing board of directors while participating in the CACFP. Information provided within the agency's CACFP contract on its board members must attest to meeting the following criteria for maintaining an independent governing board:

The Executive Director and the Authorized Representative are not members of the governing board unless the agency's bylaws, articles of incorporation, or the board's policies and procedures include a resolution stating they are not eligible to vote on items relating to board decisions regarding their salary or other human resource issues that affect them, such as hiring and firing of staff.

The majority of the total number of voting board members do not have a financial interest in the agency; being employed by the agency is having a financial interest.

- **Financial interest** is defined as receiving anything of monetary value from the agency, including but not limited to: wages, salary, consulting fees, contractor services, honoraria, equity interests (e.g., stock, stock options, or other ownership interests), interest in real or personal property, dividends, royalties, rent, capital gains, and forgiveness of debt.

The majority of the total number of voting board members are not family-related to each other as well as to staff listed on the *Staffing Personnel* page of the agency's CACFP contract.

- **Family-related members** are defined as an individual's spouse, domestic partner or similar designation, and the individual's or spouse's (or domestic partner's) children, grandchildren, great grandchildren, siblings (whether by whole or half-blood), and the spouses/partners of the children, grandchildren, great grandchildren and siblings.

Board members must remove themselves from voting on decisions related to their own financial interest and that of family members.

Board Meeting Minutes

The agency's independent governing board must be responsible for setting policy, fiscal guidance, and ongoing governance. It must regularly review the organization's policies, Programs, budgets and operations, including the CACFP. Additionally, the Board should have a screening process for identifying any criminal convictions of Board members and principals/individuals (RP/I) delegated with CACFP responsibilities, which would disqualify these individuals from any involvement with this Program.

- The governing board's oversight of the agency's CACFP must be annually documented in the board minutes, which must then be retained on file and available for review.

Private Non-Profit and Public Agencies

Private Non-Profit Agencies

Private non-profit agencies must have **Federal** tax exempt status with the Internal Revenue Service. The 501(c)3 tax exempt letter issued to the agency must be uploaded as part of its CACFP contract. The Wisconsin certificate of tax exempt status is not sufficient.

Public Agencies

Public agencies must be part of an entity recognized as "public" by the State or Federal Government. Their FEIN must be the same as is assigned to the public entity.

Public entities are: public schools; public universities and technical colleges; and Indian reservations.

For-Profit Centers

For-Profit centers may qualify to start initial CACFP participation when one of the following two conditions are met for the preceding month and then once approved, for each subsequent month to submit CACFP reimbursement claims.

In comparing the number of children/youths to the lesser number between the total number of enrolled children/youths for the given month or the center's licensed capacity:

1. At least 25 percent of the center's enrolled children/youths were authorized to receive Wisconsin Shares child care funding (Title XX funds);
- OR**
2. At least 25 percent of the center's enrolled children/youths were from households qualifying as the Free and Reduced eligibility categories based on their valid Household Size-Income Statements on file at the center, for the respective month.

9.2 Documentation of Compliance with the USDA– CACFP Civil Rights Requirements

Refer to the requirements detailed in [Guidance Memorandum 8C: Civil Rights Requirements for the CACFP](#).

9.3 Documentation of WIC Information Availability

This requirement only applies to Child Care Centers and Head Start Centers (not to Emergency Shelters, At-Risk Afterschool Programs, and Outside of School Hour Care Centers).

Child care centers and Head Start centers must demonstrate that they make current information available on the importance and benefits of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), including the most current WIC income eligibility guidelines, to the families of their enrolled children. Centers may hand out (i.e. in the enrollment packet) or post WIC information for families to see using DPI's

[Wisconsin's WIC Program Information](#)

9.4 Support Documentation for the Monthly CACFP Reimbursement Claim

Daily Attendance Records

All agencies must maintain daily attendance records of the children/youths attending their sites, including Child Care, Outside of School Hours, Head Start, and At-Risk Afterschool Program sites. Refer to section D2 below for records required specifically for Emergency Shelters.

DCF Licensed Child Care Centers

Daily attendance records must be maintained by each site, as required by the Department of Children and Families (DCF) licensing regulation (DCF 251). Attendance must be recorded for all children/youths at their actual time of arrival and departure. DPI/USDA review attendance records for verifying compliance with CACFP regulations. This may include electronic reports of daily attendance as well as records maintained for Wisconsin Shares participation.

CACFP Enrollment Forms

The CACFP Enrollment Form requirements only apply to Child Care Centers and Head Start Centers.

Enrollment forms for each child/youth that include information on each child's/youth's normal days and hours in care and meals normally received while in care, updated annually by a parent or guardian.

- Refer to [Guidance Memorandum 6C: CACFP Enrollment Requirements](#) for further information on these requirements, prototype forms that may be used to collect this information, and permitted exceptions.

Household Size-Income Statements (HSIS)

These Requirements only apply to Child Care Centers, Outside of School Hour Care Centers, and Head Start Centers with enrolled children who are not Head Start eligible.

All HSIS collected for children/youth must be retained on file to support the agency's eligibility determinations of Free, Reduced, and Non-need.

Refer to [Guidance Memorandum 1C: CACFP Requirements for Household Size-Income Statements & Determining Eligibility](#) for further information on these requirements.

[Household Size-Income Statement Form Parent Letter](#)

The Household Size-Income Record (HSIR)

These requirements only apply to Child Care Centers, Outside of School Hours Centers, and Head Start Centers with enrolled children who are not Head Start eligible.

Using the HSIR

The HSIR form must be used to track each center’s monthly enrollment data reported on the reimbursement claim. The center must complete the HSIR form each month by marking the eligibility status (Free, Reduced, or Non-needy) in the proper columns for each child/youth enrolled during that respective month.

- The same HSIR form should be used to track the children who are enrolled each month for the entire Federal Fiscal Year period, October – September.
- Refer to section L of [Guidance Memorandum 1C: CACFP Requirements for Household Size-Income Statements and Determining Eligibility](#) for further instruction on completing the HSIR each month.
- Preapproval from DPI is required for any alternative form used for this purpose.

[HSIR Word format](#)

[HSIR Excel format](#)

Sites not required to use the HSIR

Tracking Enrollment Data for At-Risk Afterschool Programs, Emergency Shelters, and Head Start Sites. All of the following sites receive the free rate of reimbursement for all meals served and claimed.

At-Risk Afterschool Program Sites

The total number of youths reported as enrolled each month on the reimbursement claim must be based on some form of daily attendance records. These daily attendance records must be retained on file to support the reported monthly enrollment.

Some At-Risk Afterschool Program sites may not follow a protocol for maintaining daily attendance records. These sites consider the meal count records required by the CACFP as their “daily attendance records”. In these cases, they may use the meal count records for determining and reporting the total number of youths enrolled for the month on the reimbursement claim.

Emergency Shelter Sites

The total number of youths reported as enrolled each month on the reimbursement claim must be based on the site’s daily rosters of those participants residing at the site. The daily rosters must have each participant’s name and date of birth.

Head Start (Including Early Head Start) Sites

When only Head Start eligible children are enrolled at the site, the total number of Head Start children reported as enrolled each month on the reimbursement claim must be based on daily attendance records. These daily attendance records must be retained on file to support the reported monthly enrollment.

Sites which enroll both Head Start Children and Children who are not Head Start Eligible: If a site has other children enrolled who are not approved as Head Start or Early Head Start eligible (including siblings of Head Start eligible children), a Household Size-Income Record must be completed to track these children’s need category status each month for reporting the accurate numbers of free, reduced,

and non-needy on the monthly reimbursement claim. (Household Size-Income Statements must be collected from the parents of these children for making need category determinations.)

Meal Count Records

These requirements apply to all types of centers including At-Risk Afterschool Programs and Emergency Shelters.

The total number of meals and snacks claimed for CACFP reimbursement each month must be based on meal count records. Meal count records must be recorded separately for each meal type (breakfast, a.m. snack, lunch, p.m. snack, supper, and/or additional snack) served each day and in accordance with the definition of a valid CACFP meal count.

All original meal count documentation must be retained on file along with the final summary records used to calculate the total meal counts that are claimed for reimbursement.

Definition of a Valid CACFP Meal Count

In order to count and record a child/youth for a meal/snack that will be claimed for CACFP reimbursement, all of the following requirements (1-5) must be met:

1. The infant/child/youth is served a meal/snack that contains all required food components according to the appropriate CACFP meal pattern, unless justified by a medical statement (refer to [Guidance Memorandum 12C: CACFP Meal Pattern Requirements](#) for further information).
2. The child/youth (1-12+ year old) is sitting at a serving table or in a highchair and participating in the meal service;
3. The entire meal/snack served to the child/youth (1-12+ year old) is supplied by the agency. No components are supplied by the parents/guardians, unless justified by a medical statement (refer to *Guidance Memorandum 12C: CACFP Meal Pattern Requirements*);
4. The infant/child/youth is served the entire meal/snack while in the agency's care, and not sent home; and
5. When the requirements specified in a-d above are met, meal counts must be recorded at the time of service.

Children/youths (1-12+ year olds): must be counted and recorded on the meal count form either at the time they are served the meal/snack or immediately, which is referred to as the "time of service" meal count.

Infants (under age 1 year): the completion of the infant meal records as the infants are served the various components is the required method of recording "meal counts" at "time of service". Refer to *Guidance Memorandum 12C, the CACFP Infant Meal Pattern* section, for further information on reimbursable infant meals/snacks.

It is unacceptable to record meal counts based on attendance records or who is expected to eat. Computerized recordkeeping systems or recording meal counts in any way that assume the children/youths have or will be served compliant meals based on the recorded times of attendance does not meet the definition of a valid CACFP meal count, and therefore must not be used for determining the number of meals claimed for CACFP reimbursement.

If the requirements specified in a-e above are not met, the meal counts are invalid for those meals and your center must not claim them. If DPI finds during a program review that invalid meal counts are claimed, those invalid meal counts will be disallowed and repayment will be required.

Meal Count Forms

If your agency has separate meal count forms for each classroom, the children/youths must be recorded on the meal count form in the classroom in which they were physically present and served the meals.

This will ensure that these children/youths are not recorded on more than one classroom's meal count form for the same meal.

Agencies approved to claim for 3 or less meal services per day may use the *Meal Count Form (Three or Less Meals)*, or a form with a similar format, to record the total number of children/youths who were counted for each meal/snack (also known as "head count").

Webcast Training: The DPI webcast *Meal Counts for 3 or Less Meals* explains how to record valid CACFP meal counts by this method. [Webcast: Meal Counts for 3 or Less Meals](#)

[Meal Count Form \(3 or Less Meals\)](#)
[Greater Than 3 Meals Record Form](#)

Agencies approved to receive reimbursement for more than three meal services per day must record meal counts by child/youth for each meal/snack, and not by the "head count" method. The *Greater Than Three Meals* form, or a form with a similar format, must be used to ensure that each child/youth is claimed for no more than two meals and one snack or two snacks and one meal per day.

- Agencies that operate more than five days per week should contact their assigned consultant for additional forms.

Agencies must follow steps 1-4 below for recording, tallying, and calculating accurate meal counts:

1. The *Greater Than Three Meals* form must list the first and last name of each child/youth in attendance.
2. A mark must be made (e.g. an "X" or check mark) next to each child's/youth's name for each compliant meal/snack the child/youth is served at the time of service.
3. **Before tallying the number of meals for each day**, each child's/youth's meal counts for each day must be reviewed and any meals/snacks that exceed two meals and one snack or two snacks and one meal must be crossed off or somehow marked (e.g.,) with a highlighter, different colored pen) so that excess meals will not be tallied.
4. The agency must have a process for double checking the meal count tally totals and the calculations of the monthly totals for each meal type to ensure accuracy of the final totals claimed for reimbursement.

Webcast Training: The DPI webcast *Meal Counts for Greater than 3 Meals* explains how to record valid CACFP meal counts by this method.

[Webcast: Meal Counts for Greater than 3 Meals](#)

Dated Menus

For meals and snacks served to children/youths one year old and over, agencies must maintain daily, dated menus for each approved meal service. The dated menus retained on file with your agency's CACFP records must be the copies showing all substitutions or changes made.

Production Records (Not Applicable to Emergency Shelters)

For children/youths one year and over, agencies must maintain daily, dated production records for each approved meal service reflecting the total quantity of each food item used in the preparation of the meal. Refer to Guidance Memorandum 12C for the prototype *Production Record* form and instructions on how to complete the production records.

[Production Record Form](#)
[Production Record Instructions](#)

Meals Purchased from a Vendor

When meals are purchased from a vendor such as a school, health care facility, or food service company, the vendor must maintain records of menus, production records and/or delivery slip records for the meals provided to the agency showing that all required components and their minimum required quantities were provided for each meal; this includes maintaining copies of Child Nutrition (CN) labels and manufacturers' product formulation statements for any commercially prepared combination food items (e.g., corn dogs, ravioli) served as part of the meals provided to the agency. The vendor must provide copies of these records to the agency. It is the agency's responsibility to monitor their contracted vendor to assure that the vendor complies with CACFP requirements. Refer to [Guidance Memorandum 4: CACFP Procurement Requirements—For Purchasing and Vendor Agreements to Provide Meals/Snacks](#) for more details.

9.5 Training and Monitoring Documentation

Training: All Agencies (both Independent Agencies and Sponsoring Organizations)

Regardless whether an independent agency or a sponsoring organization, all CACFP-related trainings must be properly documented.

Documentation of CACFP-Related Training Sessions

The agency's CACFP training records must include: date(s), location(s), specific topics covered, copies of materials used for the trainings, and names of attendees. All staff, including new staff, must be adequately trained so that they can sufficiently meet the CACFP requirements for which they are responsible.

Agencies may use DPI's *CACFP Training Agenda* form to document their CACFP training. This form lists the required key topics, suggested optional topics, and provides space for the attendees to sign in.

[CACFP Training Agenda Form](#)

- **New Employees:** It is the agency's responsibility to provide CACFP-related training to its new employees for assuring a successful transfer of CACFP knowledge and responsibilities before they are held responsible any CACFP related tasks.
- **Cross-Training of Staff on CACFP Responsibilities:** When staff holding CACFP responsibilities quit his/her position, it is the agency's responsibility to cross train staff for proper overlap in knowledge during the staff turnover period. If a person in a high level position (i.e. director, program administrator) is primarily responsible for the CACFP, that person's supervisor should have working knowledge of the CACFP. If direct oversight of this person's position is the agency's governing board, the President of the board, at minimum, should have working knowledge of the CACFP.

Documentation of Annual Civil Rights Training

Training must be completed annually by all paid and volunteer staff within the agency who have contact with the community, as specified in section II of *Guidance Memorandum 8C: Civil Rights Requirements in the CACFP*.

Sponsoring Organizations (All agencies with more than one Site)

Refer to *Guidance Memorandum 5C: CACFP Sponsoring Organization Requirements* for further detail on the specific training and monitoring requirements for sponsoring organizations.

[Guidance Memorandum 5C: CACFP Sponsoring Organization Requirements](#)

CACFP Training Requirements

Sponsoring organizations are required to provide training at least once a year for all key staff holding CACFP responsibilities. These agencies must document their CACFP training efforts; records relating to these required annual trainings must be retained on file and include the training date(s), location(s), specific topics covered, copies of materials used for the trainings, and names of attendees.

CACFP Monitoring Requirements

Sponsoring Organizations must document their monitoring efforts for each CACFP site, as specified in Guidance Memorandum 5C, to demonstrate that all of these sites are properly monitored. The most current *CACFP Site Pre-operational Visit* and *CACFP Site Review* forms must be used by sponsoring organizations, unless otherwise pre-approved by DPI.

9.6 CACFP Procurement, Contracting, and Rental/Leasing

Documentation

Refer to [Guidance Memorandum 4: CACFP Procurement Requirements—For Purchasing and Vendor Agreements to Provide Meals/Snacks](#) for further information on the following requirements.

The following records must be retained on file for review:

Written Procurement Policies and Procedures

All agencies must have written procurement policies and procedures which include the required standards specified in Guidance Memo 4.

Documentation of Contacted Suppliers/Vendors

Agencies must follow the USDA procurement requirements and retain records documenting the procedures followed by the agency for any procurement of goods and services, including contracts and leases. When using the small purchase method and formal methods of procurement, procurement records must include documentation of all prospective companies from which to purchase supplies and/or vendors considered when pursuing new contracts or renewing existing contracts to provide products and services related to the CACFP.

Current Contracts Covered by CACFP Funds (including Rental/Lease Agreements)

These records include:

- Signed contracts for meals provided by a vendor (i.e. school, health care facility, restaurant, another agency) or a food service management company;
- Signed contracts for the procurement of goods and services, including accounting services, equipment rental, consulting, etc.

9.7 Expense and Income Records

Refer to [Guidance Memorandum 11: CACFP Financial Management Requirements](#) for further information on the requirements for financial records.

The following financial records must be retained on file:

Documentation for all Expenditures Covered by CACFP Funds

- Itemized receipts, invoices, purchase orders for food and nonfood purchases;
- Inventory records of purchases, including date and source, when the receipts do not show the description of each item purchased;
- Time sheets for food service labor; and
- A payment summary or expense ledger with all food service costs listed under the appropriate itemized headings (e.g. food costs, non-food costs).

Documentation of all Income Sources Used for the Food Service Operation:

- Printed Claim Summary pages (from the DPI on-line claiming system) for submitted CACFP reimbursement claims.
- Any income received or other income sources used by the agency to cover for the costs of meals served to non-program adults (refer to *Guidance Memorandum 12C*), non-enrolled children/youths, and/or enrolled children/youths who pay for their meals within agencies administering the *CACFP Pricing Program Addendum*.
- Other income specifically designated for food service, including gifts, donations, payments for meals sold to other agencies.
- An income ledger clearly identifying all food service income.

9.8 Donations

Agencies may use donated foods received from the community for preparing meals that will be served to their enrolled children/youths, with the following conditions:

- Donated foods must be thoroughly inspected to assure that they are in good condition, have not expired or become outdated, and have not been tampered with;
- Parents/guardians cannot be required to donate food;
- Individual meals provided by the parents for their children or any other enrolled children/youths are not considered to be acceptable “donations”.

Documenting Received Donations

If your agency receives any donations of food that are then used for preparing meals served to the agency’s enrolled children/youths, a log of these donations must be kept and retained on file to justify the agency’s overall lower food costs and to show the source of these food items. A log of food donations should at minimum include:

- The descriptions of the donated items;
- The quantity of each donated food item;
- When they were donated; and
- By whom they were donated.

Contact your agency’s assigned consultant if interested in obtaining a copy of DPI’s prototype form for recording donations.

Food Donations Purchased with WIC or FoodShare Funds

Donations of foods that were purchased with WIC or FoodShare funds cannot be accepted. If an agency is aware that the donor’s foods were purchased using WIC or FoodShare money, should inform the donors to return the goods to the local WIC and/or FoodShare office.

9.9 Using Personal WIC or FoodShare Money for Agency Purchases

WIC or FoodShare funds cannot be used for purchasing food used in meals served by agencies participating in the CACFP. Staff, employees, and/or volunteers who purchase food and supplies used to prepare meals served to the enrolled children/youths can be reported to the WIC or FoodShare administering agency for improper use.

- **The costs for any goods purchased with WIC or FoodShare money are unallowable and cannot be covered by CACFP funds.**