



# WI FDCH Sponsor – DPI Agreement

## CACFP Meal Pattern Documentation and Monitoring Requirements

October 2020

This *WI FDCH Sponsor – DPI Agreement* was first implemented for Federal Fiscal Year (FFY) 2018. Effective October 1, 2017, all FDCH Sponsors were to make changes to their software programs and operational/administrative policies and procedures to successfully implement the new CACFP meal pattern requirements. It lays out the parameters for implementing these requirements in an effective, consistent, and fair manner from both the DPI's and FDCH sponsors' perspective. This Agreement has evolved each year since it was first implemented and will continue as a base for future collaborative decisions on changes needed to improve its effectiveness. Any changes to be made are typically discussed during our annual DPI-FDCH Sponsor Trainings.

### **DISALLOWANCES:**

Unless USDA issues notice permitting otherwise, both claims processing and home visit (HV) procedures for making disallowances of meals and snacks that are non-compliant with the new meal pattern requirements must be in place and implemented.

Parameters on specific disallowances to be made as part of Home Visits (HV) are detailed within the "Home Visit (HV) Checkpoints, Documentation, and Disallowances" section of this document.

### **HOME VISIT MENU AND PRODUCT DOCUMENTATION REVIEW LOG**

The *HV Menu and Product Documentation Log* implemented in October 2019 was devised as "trial one" for establishing a systematic and efficient approach of reviewing a well-rounded sample of foods that providers were serving for grain items identified as Whole Grain-Rich (WGR), cereals, yogurt, and store-bought combination items reported on their menus submitted each month for reimbursement. This logging method was to lessen repetitive assessment of the same foods providers were found to be serving from one home visit to the next and to keep running tabs on the various types of items being served on their menus throughout the year. This approach was introduced as an alternative to requiring that providers retain packaging from all of their foods served for these items, to then be reviewed by monitors during their home visits for verifying whether they met the crediting criteria. This logging process enables the monitor to focus on verifying creditability of foods on-hand, save time by filtering out foods they have already reviewed during prior home visits with the provider, yet prevent items regularly served on their menus from going unchecked if they are not on-hand during home visits.

**FFY 2021 Options for the *Home Visit and Product Documentation Review Log*:** Starting for use October 1, 2020 for FFY 2021, DPI is proposing two versions of this log form, Version 1 (revision of Version 1 used in FFY 2020) and Version 2, that sponsors may choose from to continue this logging process for monitoring foods that require review of individual product information to verify they are creditable.

### **HOME VISIT INFANT REVIEW LOG**

**FFY 2021:** The *Home Visit Infant Review Log* also implemented in October 2019 has been revised for clarity, assesses the provider's accommodation of each infant's developmental readiness, and has additional room for notes.

*If a sponsor has an alternate *Home Visit and Product Documentation Review Log* to complete the menu and product documentation review process or an alternate *HV Infant Review log* method to document the review of each infant during HVs or DPI's version is inconveniently duplicative, to propose that will better enable their monitors to expedite this process, they are to submit their proposed method to their assigned DPI consultant for approval prior to implementation. The submitted information must describe or illustrate its process and documentation method and how it will capture information and function similarly to DPI's log.*

- Subsequent pages 2-4 list the new CACFP meal pattern requirements for each meal component and include particulars unique to the components for menu documentation, claims processing, and monitoring
- Pages 5-6 consolidate the information on home visit checkpoints, required documentation, and disallowances that was previously listed separately for each component, together into one section with instructions on using the home visit logs.



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### Milk

**USDA Regulations:** ● [7 CFR 226.20\(a\)\(1\)](#) ● [CACFP Policy Memo 17-2016-CACFP Requirements for Fluid Milk & Nondairy Milk Substitutions](#)  
● [CACFP Policy Memo 13-2018: Child Nutrition Programs' Flexibilities \(Milk\)](#)

- 1) Milk served to one year olds must be unflavored whole milk or creditable unflavored non-dairy beverages
- 2) Milk served to children two year olds and older must be unflavored low-fat (1%)/fat-free (skim) milk or creditable unflavored non-dairy beverages
- 3) Fat-free or 1% flavored milk and creditable flavored non-dairy beverages can be served to children 6 years and older
- 4) A one-month transition period is allowed for children 24 months to 25 months old. They may have whole or reduced-fat (2%) milk as they transition to low-fat (1%) or fat-free (skim) milk. *DPI strongly advises not promoting 2% during this transition period because of the confusion it may cause.*

**Sponsor's Software and Provider's Menu Documentation:** The types of milk served to each age group must be documented on menus in some way, including the fat content and if flavored, for each age group.

● **Menu Documentation in the form of the "Milk Certification Statement":**

Sponsors may have an all-inclusive "Milk Certification Statement" detailing the types of milk served to each age group (fat % and if flavored), which is then agreed to by the Provider when submitting the completed menus/meal count forms to the Sponsors for claims processing.

▪ FDCH Sponsors and DPI agree that if using the "Milk Certification Statement" method of menu documentation for milk types, it is acceptable to list "milk" as the single choice to be selected from the software's food lists by the provider for the milk component.

▪ **If the Sponsor does not incorporate the "Milk Certification Statement" into its menu system**, then the Sponsor must include the choice of individual and/or grouped milk types within its software program's food list, which then can be selected by the online claimers, and require paper claimers to record the individual or grouped milk types (fat % and if flavored) served to each age group.

▪ **Using old Paper Menu Forms or Forms without the "Milk Certification Statement":** if the Sponsor chooses to have Providers use up old menu forms not having the "Milk Certification Statement" and/or chooses to not add the "Milk Certification Statement" to newly printed paper menu forms, Providers must document the individual and/or grouped milk types (fat % and if flavored) served to each age group as follows:

- Record the individual and/or grouped milk types (fat % and if flavored) served to each age group, for each meal and snack; **OR**
- Handwrite the "Milk Certification Statement" on each paper menu form (*for example, on the top or bottom of the form*) OR sign and submit, with the menu forms, a separate document containing the pre-printed "Milk Certification Statement".

● **Flavored milk** may be noted in various ways by the Provider (e.g. by recording within the menu comments section or selecting/recording a specific fat %/flavored milk option

● **Monitoring of Menu Documentation at the Claim Level:** Sponsors must ensure that their software programs enable both online claimers and paper claimers to meet the menu documentation requirement stated above of the different milk types per age group by following their established procedures.

● **Claim Review - Meal Pattern Error Detection:** Compliance with the meal pattern's milk component requirements cannot be detected at the claim level when the specific milk type served is not identified by child. This is furthermore the case when using an all-inclusive certification statement or having individual and/or grouped milk choices within the food lists for selecting the types of milk served per age group. Therefore, meals cannot be disallowed for milk type errors within the automated claim processing system. DPI advises Sponsors to treat paper claimers (who handwrite their food items for each meal component) the same as online claimers by not disallowing meals for milk errors recorded on their menus.

### Grains

**USDA Regulations:** ● [7 CFR 226.20\(a\)\(4\)](#) ● [CACFP Policy Memo 16-2017: Grain-Based Desserts](#) ● [CACFP Policy Memo 09-2018: Grain Requirements](#)

**DPI Resources:** ● [Whole Grain-Rich Flow Chart](#) ● [WI WIC Approved Whole Grains](#) ● [CACFP Grains Chart](#) ● [WIC Approved Cereals List](#)  
 ● [Is it a Grain-Based Dessert?](#) ● [CACFP Reference Guide](#) ● [USDA Crediting Handbook for the CACFP](#)  
 ● [New Creditable Foods](#) (corn masa, masa harina, nixtamalized corn flour/cornmeal, hominy, popcorn)

- 1) Grain-based desserts are not creditable (*refer to [CACFP Grains Chart](#) and [Is it a Grain-Based Dessert?](#)*)
- 2) Whole Grain Rich (WGR) Foods must be served for at least one approved meal type per day; all other grains served must be enriched.
  - WGR foods contain 100% whole grains or at least 50% are whole grains and the remaining grains are enriched
  - This whole grain-rich requirement only applies to meals served to children 1 year and older, not to infant meals.
- 3) Breakfast cereals must contain no more than 6 grams of sugar per dry ounce when served to both infants and children 1 year and older

### Provider’s Menu and Product Documentation

#### 1. WGR Foods:

- **Menu Documentation:** WGR items must be identified on the menus by marking them as “WGR”, “WG” or, “WW”. “WGR” covers all whole grain (WG) and whole wheat items (WW); therefore, it easiest to consistently record “WGR” on the menus for all WGR foods. This requirement applies to both on-line claimers and paper claimers.
  - **WGR Foods Served for Meals with no Meal Attendance:** If a provider planned to serve a WGR item for a meal on a day he/she was not able to serve due to an unanticipated event or no meal attendance, the provider must still complete the menu for that meal to show that a WGR item would have been served on that day. No meals should be disallowed for missing a WGR item that day. *Providers cannot circumvent the WGR requirement by "planning" to serve a WGR item for meals typically not claimed.*
    - ➔ If the least reimbursable meal containing a grain is disallowed for that day, a manual adjustment may be needed to add meal reimbursement back in for the deducted meal.
- **Product Documentation:** Providers must have on-hand during HVs:
  - Recipes for home-made WGR goods
  - Product packaging (actual/copies/photos) for store-bought WGR foods showing the product names/brands, how item is labeled (ex. for breads, buns, and pastas labeled as whole wheat), ingredient lists, and/or CN labels.

#### 2. Breakfast Cereals:

- **Menu Documentation:** Best practice is to maintain specific cereal names (e.g. Rice Krispies, Cheerios) within the Sponsor’s software food lists for Providers to select for online claimers and have paper claimers record specific cereal names served on their submitted menus.
  - Sponsors may keep breakfast cereal selections within their software food lists as general descriptions; for example, ‘Cold/Ready-to-Eat Cereal’ and ‘Hot Cereal’; paper claimers may also record breakfast cereals served using these general descriptions.
- **Product Documentation for cereals:** Providers must have on-hand during HVs:
  - Product packaging (actual, containing the food on-hand or empty, copies, photos) that shows the cereal names (e.g. Cheerios); if serving cereals that are not on the [WIC Approved Cereals List](#), the product packaging must show the cereal names and their nutrition fact labels to verify whether they meet the sugar limit.

3. **Grain-based Desserts (GBD):** Sponsors are not required to include GBD items within their software food lists when their policy is that they do not include non-creditable foods on their food lists.

### Meat/Meat Alternates (M/MA)

**USDA Regulations:** • [7 CFR 226.20\(a\)\(5\)](#) • [USDA Policy Memorandum 21-2016: Crediting Tofu and Soy Yogurt in the CACFP](#)

**DPI Resources:** • [CACFP Reference Guide](#) (yogurt sugar limits) • [Methods to Determine Sugar Amounts in Yogurt](#)  
 • [Serving Tofu and Soy Yogurt in the CACFP](#) • [CACFP Crediting Guide](#) • [Creditable/Non-Creditable Cheese](#)  
 • [Crediting Store-bought Combo Foods](#) • [New Creditable Foods](#) (Shelf-stable meat/poultry, seafood products; Surimi seafood; Tempeh)

- 1) M/MA may be served in place of the entire grains component at breakfast a maximum of three times per week
- 2) Tofu credits as a meat alternate for 1+ year olds if:
  - It is commercially prepared (store-bought); and 2.2 oz. (1/4 cup) of tofu containing at least 5 g of protein = 1.0 oz. M/MA
- 3) Soy yogurt credits as a meat alternate (MA) for 1+ year olds (*the same as yogurt: 4 ounces (1/2 cup) = 1 ounce M/MA*)
- 4) Yogurt (including soy yogurt) must contain no more than 23 grams of sugar per 6 ounces
- 5) Store-bought Combination Items (includes M/MAs with fillers like meatballs; chicken nuggets; pizza; lasagna; macaroni & cheese) must have Child Nutrition (CN) Labels or Product Formulation Statements (PFS)

$$\text{Protein (g)} \div \text{Serving Size (oz.) or (g)} = \text{Threshold for ounces: 2.27 or more}$$

$$\text{Threshold for grams: .08 or more}$$

### Fruits and Vegetables (F & V)

**Resources:**

[CACFP Crediting Guide](#)

[Additional Creditable Fruits & Vegetables Smoothies](#)

**USDA Regulations:**

[7 CFR 226.20\(a\)\(2\) and \(3\)](#)

[USDA Policy Memorandum 25-2016: Vegetables/Fruits Requirements in the CACFP](#)

[USDA Policy Memorandum 09-2017: Vegetables and Fruits Requirements in the CACFP: Q & A](#)

- 1) F & Vs are separate components at lunch, supper and snack; the F/V component remains as a combined component for breakfast.
- 2) A vegetable is required for lunch and supper:
  - A vegetable and a fruit, OR two different vegetables must be served. Two fruits cannot be served.
  - Minimum serving size requirements of the F & V component are equal, except for 6-12 year olds; at minimum, ½ cup of vegetable and ¼ cup fruit are required for 6-12 year olds.
- 3) A fruit and a vegetable can be served as a snack
- 4) Juice may only be served at one meal or snack per day

### Infant Requirements

**USDA Regulations:** • [7 CFR 226.20\(b\)](#) • [USDA Policy Memo 02-2018-Feeding Infants & Meal Pattern Requirements in the CACFP](#)

**Resources:** • [Infant Meal Pattern Chart](#) • [Foods for Infants Handout](#) • [USDA Feeding Infants for CACFP Guide](#) • [Infant Developmental Readiness Handout](#)

- 1) Meals are reimbursable when a mother breastfeeds on-site, including when an infant is only consuming breastmilk.
- 2) Yogurt and whole eggs are allowable meat alternates
- 3) Ready-to-eat cereals may be served at snack
- 4) A vegetable or fruit, or both must be served at snack for infants 6 - 11 months old, when developmentally ready
- 5) Juice, cheese food, and cheese spread are not creditable towards the CACFP Infant Meal Pattern
- 6) Parents/guardians may provide only one meal component of infant meals and snacks to be claimed
- 7) Introduction of foods is based on developmental readiness; providers must supply foods once developmentally ready, including < than 6 months

### Requirements for Food Preparation/Cooking Methods

**Resources:** [Acceptable Cooking Methods](#)

**USDA Regulations:** [7 CFR 226.20\(d\)](#)

Deep-fat fried foods that are prepared on-site cannot be part of a reimbursable meal. For this purpose, deep-fat frying means cooking by submerging food in hot oil or other fat. Pre-fried, flash-fried, or par-fried foods by a manufacturer may be served, but must be reheated by a method other than frying.

**Home Visit (HV) Checkpoints, Documentation, and Disallowances**

**Home Visit Preparation**

**Menu Review:** Review the provider’s **monthly menus from the most recently processed claim and the current month’s menus up to the HV date** for the items listed in the Meal Components Chart, below.

**HV Menu and Product Documentation Review Log:** List grains and meat/meat alternate items with a “\*” in the Meal Components Chart below on the *HV Menu and Product Documentation Log* if served on reviewed menus

Identify meal pattern errors for items with a “✘” in the Meal Components Chart below on current month’s menus and do not record them on the *HV Menu and Product Documentation Review Log*.

**MEAL COMPONENTS CHART**

<b>GRAINS:</b>	<b>MEAT/MEAT ALTERNATES (M/MA)</b>	<b>FRUITS &amp; VEGETABLES (F/V)</b> <i>[Do not list on HV Menu-Product Doc Review log]</i>
<ul style="list-style-type: none"> <li>* Breakfast cereals</li> <li>* Grains identified as WGR</li> <li>✘ Any non-creditable grains, i.e. grain-based desserts (GBD)</li> </ul>	<ul style="list-style-type: none"> <li>* Yogurt (regular or soy)</li> <li>* Store-bought combination foods</li> <li>* Tofu</li> <li>✘ Serving M/MA for breakfast &gt; 3 times/week</li> <li>✘ Any other non-creditable M/MA</li> </ul>	<p>Note when the following errors are identified <b>on the current month’s menus:</b></p> <ul style="list-style-type: none"> <li>✘ Missing vegetables for lunches &amp; suppers</li> <li>✘ The same food is served as the vegetable &amp; fruit component for lunches &amp; suppers</li> <li>✘ Juice is served &gt; one meal/day</li> <li>✘ Items served to meet the F/V component that are not creditable as a F/V</li> </ul>

**HV Infant Review Log:** Review the provider’s **infant menus from the most recently processed claim and the current month’s menus up to the HV date.**  
List all items served to each infant on their menus

**During Home Visit**

**Review of Foods/product documentation on-hand for items with a “\*”**

- \* Continue completing the Home Visit Menu and Product Documentation Review Log (for items with a “\*” in the meal components chart above) by:
  - Listing brands/names of foods on-hand for items identified on the reviewed menus
  - Reviewing product packaging of store-bought foods (*and recipes for home-made grain items*) for items identified within the reviewed menus
    - Verify whether foods meet their respective crediting criteria
    - if item is creditable
  - Marking “Y” or “N” for each listed menu item for whether they had foods/product doc/recipes on-hand
    - Items marked “N” require follow-up

**Review of Formula/Breast Milk/Foods On-hand for each infant (During Home Visit)**

- \* Continue completing the Home Visit Infant Review Log by:
  - Reviewing formula/breast milk/foods on-hand for each infant
    - List/identify each component as provider and/or family-supplied
    - if item (*regardless of family or provider supplied*) is creditable
  - Checking if each infant is being served foods appropriate to their developmental readiness;
  - Checking if the provider is only claiming infant meals with <= 1 family-supplied item
  - Assessing whether the provider is recording all items on the menus that are actually being served to each infant

**Milk**

- **Check refrigerator:**  
Request provider to show which milks are served to each age group.
- **When observing a meal:**  
Identify the age groups and milk types served to each and whether they are the correct types of milks

**Meal Preparation Methods**

- Check food preparation methods during a meal observation visit for whether the provider is deep-fat frying any foods served for meals
- If not observing a meal, ask open-ended discussion/Questions, Ex: “How do you cook your foods?”

**Disallowances for Meal Pattern Errors**

<b>Served on the HV Day</b>	<b>Within current month’s menus back to the 1<sup>st</sup> of that month</b>
<p><b>M/MAs:</b></p> <ul style="list-style-type: none"> <li>*yogurt (&gt; sugar limit)</li> <li>*store-bought combination foods (no CN label/PFS)</li> <li>*tofu (&lt; required # of protein grams)</li> </ul> <p><b>GRAINS:</b></p> <ul style="list-style-type: none"> <li>*Non-creditable cereal (exceeded sugar limit)</li> <li>*non-creditable grains (i.e. grain based desserts)</li> <li>*The least reimbursable meal serving a grain when a WGR item is not served/will not be served on the HV day                             <ul style="list-style-type: none"> <li>• <i>Meals must be disallowed starting 10/1/20 for not meeting the latest updated WGR crediting criteria (updated in 2019). Sponsor monitors were to give TA during FFY 2020 and not disallow meals when grains were found not creditable as WGR.</i></li> </ul> </li> </ul> <p><b>INFANT MEALS</b></p> <ul style="list-style-type: none"> <li>*More than one family-supplied meal component</li> <li>*Non-creditable items</li> <li>*Items served are not appropriate to the infant’s developmental readiness</li> </ul> <p><b>FRUITS/VEGETABLES</b></p> <ul style="list-style-type: none"> <li>• F/V errors observed at meal</li> <li>• Juice: least reimbursable meal if served more than 1X on HV day</li> </ul> <p><b>MILK</b></p> <ul style="list-style-type: none"> <li>• Incorrect types of milk during a meal observation</li> <li>• Up to the HV time if correct types of milk were not on-hand for that day’s meals (for example, if no empty milk container in garbage)</li> <li>• For that day if evident that provider will be unable to buy the correct types of milk before the end of the day for meals not yet served</li> </ul> <p><b>PREPARATION METHODS:</b></p> <ul style="list-style-type: none"> <li>• Meals serving deep-fat fried foods prepared on-site during meal observation</li> </ul>	<ul style="list-style-type: none"> <li>• Any non-creditable foods for any meal component or meals that are missing components</li> </ul> <p><b>GRAINS:</b></p> <ul style="list-style-type: none"> <li>• Non-creditable grains, including grain based desserts</li> </ul> <p><b>M/MA:</b></p> <ul style="list-style-type: none"> <li>• Breakfasts serving M/MAs instead of grains &lt;= 3X/week</li> </ul> <p><b>F/V:</b></p> <ul style="list-style-type: none"> <li>• Vegetable not served for lunch/supper</li> <li>• The same food served for vegetable &amp; fruit components for lunch/supper</li> <li>• The least reimbursable meal when juice is served more than 1X/day</li> </ul> <p><b>INFANT MEALS</b></p> <ul style="list-style-type: none"> <li>* More than one family-supplied meal component</li> <li>* Non-creditable items</li> <li>* Items served are not appropriate to the infant’s developmental readiness</li> </ul>

**Home Visit Form Documentation**

<p><b>RECORD FOLLOW-UP ON:</b></p> <ul style="list-style-type: none"> <li>• Menu items without foods on-hand or product doc/recipes <u>during the prior HV</u>- whether the provider now has foods on-hand or product doc/recipes for these foods at this HV, and if so, are creditable.</li> <li>• Items on the reviewed menus that did not have foods on-hand during this HV, for follow up <u>at the next HV or by provider sending in copies</u></li> </ul>
<p><b>RECORD NON-COMPLIANCE AND REQUIRED CORRECTIVE ACTION (CA):</b></p> <ul style="list-style-type: none"> <li>• Non-creditable foods identified when reviewing product documentation on-hand (list specific names/brands of foods)</li> <li>• Incorrect types of milk served according to age group (specify what type and age group)</li> <li>• Infants                             <ul style="list-style-type: none"> <li>◆ Serving non-creditable items (specify each item)</li> <li>◆ Not serving meals according to infant’s readiness (explain specific situation)</li> <li>◆ Claimed meals containing &gt; 1 family-supplied item (specify infant and meals)</li> <li>◆ Not recording all foods actually served on the infant’s menus (specify infant and foods not recorded)</li> </ul> </li> <li>• Provider is deep-fat frying foods on-site (specify which foods)</li> <li>• Meal pattern errors (non-creditable foods/missing components) identified within the current month’s menus</li> </ul>