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E-LEARNING

For more information and training on the requirements in this Guidance Memorandum go to the applicable CACFP E-Learning Course for your program:

- Child Care Centers, Outside of School Hours, Emergency Shelters, and Head Starts
- Adult Day Centers
- At-Risk Afterschool Centers

CACFP RECORDS AND RECORDKEEPING

CACFP records must be maintained on site, be accessible during normal business hours and be available for review by DPI, USDA, or other state officials within one hour of arrival, announced or unannounced. All CACFP records must be retained on file for three Federal Fiscal Years (FFY) years plus the current FFY (October 1 through September 30) and for longer when specified or if audit findings have not been closed.

Recordkeeping Resources

The following resources are available to assist programs in meeting CACFP requirements:

- Requirements Checklist includes CACFP requirements and resources
- Required Documents List includes CACFP forms each type of program must complete and frequency
- New Staff Responsible for CACFP lists what to do as a new CACFP Authorized Representative or primary staff responsible for the CACFP
- At-Risk Component: Requirements and Deadlines includes information for At-Risk programs on requirements prior to and during At-Risk operation

Electronic Storage

Programs choosing to store documents electronically must ensure their electronic storage systems sufficiently preserve and maintain these records so they are legible and accessible for the required retention period. The agency must be able to be print these records for DPI or USDA when requested. Programs that store records electronically should have written policies and procedures that include the 11 points listed on page 2 of DPI's resource: Electronic Storage of CACFP Records and Data.

CACFP CONTRACT

The CACFP contract must be renewed each Federal Fiscal Year to continue participation. The DPI emails the Authorized Representative when it is time to renew the contract.

Agencies must update and submit its CACFP contract when changes occur throughout the year, such as a change in Authorized Representative, board member changes, change in Food Service Vendor, DCF Child Care License changes, when a site moves its location, and adding meal types served.

➢ If there are changes with the Federal Employer Identification Number (FEIN), legal name, or ownership of the agency, contact your assigned consultant.

Failure to submit these changes and receive DPI approval in a timely manner may result in disruption of CACFP participation and/or reimbursement. Contact your assigned consultant when changes are made and the contract is submitted.

➢ Refer to the CACFP Contract Manual for instructions on how to access, update and submit the contract.

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

The signed copy must remain permanently on file beyond the three-year retention rule.

Contracted Services

A CACFP agency may NOT contract out its management of the program. Program management responsibilities that an agency may NOT contract out include, but are not limited to:

1. Signature authority on the CACFP contract between the agency and the WI Department of Public (DPI) Instruction and contract documents.
2. Providing adequate supervisory and operational personnel for management and monitoring of the program; training and monitoring administrative and site staff.
3. Control of the quality, extent, and general nature of the food service.
4. Submission of claims for program reimbursement.
5. Determining eligibility, signature authority and privacy rules related to Household Income Statements.
6. Recordkeeping responsibilities, including meal counts to verify claims.
7. Compliance with state and local regulations including health certification and licensing requirements.
8. Adherence to the procurement standards when contracting (refer to GM 4).

A CACFP agency must check with WI DPI before allowing a contractor to undertake any other tasks that may include management functions that may not be delegated.

GOVERNING BOARDS

All non-profit agencies and any for-profit agencies with governing boards must have an independent board of directors. The board must provide oversight of the agency's CACFP.

An independent board consists of a majority of voting members:
1. Who are not **family-related** to each other as well as to agency personnel, including the Authorized Representative, Executive Director, and staff listed on the *Staffing Personnel* page of the agency's CACFP contract.
2. Whose livelihood is independent from, and who hold no personal **financial interest** in, the agency's activities.

   ➢ A majority is defined as greater than 50 percent of the total number of voting board members.
   ➢ Board members must remove themselves from voting on decisions related to their own financial interest and that of family members.

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.

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 Executive Director and the Authorized Representative cannot be 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 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 delegated with CACFP responsibilities, which would disqualify these individuals from any involvement with the CACFP.

Board Meeting Minutes

The CACFP must be discussed during a board meeting at least annually and documented in the board minutes. Board minutes must be retained on file and available for review.

WIC INFORMATION (Child Care Centers and Head Start Sites only)

Child care centers and Head Start sites must provide current information on the benefits of the Women, Infants and Children (WIC) program, including the most current WIC income eligibility guidelines, to the families of their enrolled children. Programs may use the WI WIC Program Information Sheet.

To provide current information, post the WI WIC Program Information Sheet with the current Income Eligibility Table in a location visible to families. The DPI annually informs agencies, through the CACFP Bulletin email, when the updated WI WIC Program Information Sheet with the current Income Eligibility Table has been posted to the GM webpage.

MEAL COUNTS

Meal counts must be recorded separately for each meal type (breakfast, AM snack, lunch, PM snack, supper, and/or additional snack) served each day. The total number of meals and snacks claimed each month must be compiled from meal count records. 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.

Time of Service (TOS) Meal Count

TOS meal counts must be recorded either at the time participants are served the meal/snack or immediately after. It is NOT acceptable to record meal counts based on who is expected to eat, before the complete meal/snack is served to participants, at the end of the day or week, or from attendance records, including computerized attendance systems.

Valid Meal Count

To record a participant for a meal/snack that will be claimed, all of the following requirements must be met:

1. Participant is served a meal/snack that contains all required food components and creditable foods
2. Participant is sitting and participating in the meal service
3. The entire meal/snack served to the participant is supplied by the program (families may supply one creditable component for non-medical reasons)
4. Participant is served the entire meal/snack while in the program's care, and not sent home; and
5. Meal counts are recorded at the time of service

If the requirements specified above are not met, the meal counts are invalid and must not be claimed. If DPI finds during a review that invalid meal counts are claimed, those meal counts will be disallowed.

Record participants in the room in which they are physically present and served the meal/snack. This will ensure that participants are not recorded in more than one room's meal counts for the same meal.

Meal Count Forms

Meal count template forms that can be used to document time of service meal counts are listed below. It is recommended to use a template form, however, an agency-specific form with a similar format may be used.

Claiming Three or Less Meal Services

Record the total number of participants who were counted for each meal/snack (also known as a "head count") on the Meal Count Form (Three or Less Meals).

Claiming More than Three Meal Services

Record meal counts by participant for each meal/snack to ensure each participant is claimed for no more than two meals and one snack or two snacks and one meal per day. The "head count" method cannot be used. The following forms may be used:

- Greater Than Three Meals Record (M-F)
- Greater Than Three Meals Record (Sat/Sun)

When claiming more than three meal services, programs must follow steps 1-3 below for recording, tallying and calculating accurate meal counts:

1. The meal count form must list the first and last name of each participant.
2. A mark must be made (e.g., an "X" or check mark) in the column of each meal/snack served at the time of service in the row of the participant's name.
3. Before tallying the number of meal/snacks for each day, each participant's meal counts 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 marked (e.g. with a highlighter, different colored pen) so that excess meals are not counted.

At-Risk Afterschool Programs
Programs claiming an afterschool meal and/or snack use one of the following forms to record meal counts by crossing off a number as each participant receives a creditable meal:
- At-Risk Meal Count Lunch/Supper – Weekly
- At-Risk Meal Count Snack – Weekly
- At-Risk Meal Count All Meals - Daily

At-Risk Afterschool Programs may serve and claim meals on field trips. Refer to the At-Risk Field Trip Form Instructions and use the At-Risk Meal Count Field Trip Form.

Infants
Programs claiming meals served to infants (ages 0-11 months) must use the Infant Meal Form or Infant Meal Record. Do not record infant meals on any of the above meal count forms. Refer to Guidance Memorandum 12: Meal Requirements Infants for more information.

ATTENDANCE RECORDS

Child Care Centers, Head Start, Outside of School Hours, Adult Care Centers
Must maintain daily attendance records of the participants attending their sites.

At-Risk Afterschool Programs
Must maintain daily attendance records of the participants attending their sites. If a site does not maintain an attendance roster, meal counts must be taken by participant name. Therefore, the meal counts recorded by name are the attendance records.

Emergency Shelters
Must maintain a daily roster of the participants residing at the shelter, including each participant's name and date of birth.

TRAINING
All staff, including new staff, must be trained so they can perform the CACFP tasks for which they are responsible. Programs may use the following to train staff:
- Lessons in the *CACFP E-Learning Course* applicable to the program, linked to on page 1 of this GM
- Guidance Memorandums
- Forms or other resources applicable to CACFP tasks

CACFP training may be documented on DPI's CACFP Training Checklist.

If a person who is primarily responsible for the CACFP leaves the agency, refer to the New Staff Responsible for CACFP and contact your Assigned Consultant.

Civil Rights Training
Training must be completed annually by all staff within the agency who have contact with the community, as specified in Guidance Memorandum 8: Civil Rights Requirements.