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***** CDPHE-CACFP PROCEDURE MEMO CENTERS #15-20 *****
***** CDPHE-CACFP PROCEDURE MEMO FDCH #15-17 *****

DATE: July 10, 2015
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SUBJECT: 5-day reconciliation procedures and flexibilities
TO: CACFP sponsoring organizations of family day care homes and unaffiliated child care centers

This memorandum describes procedural changes of the Colorado Department of Public Health and Environment-Child and Adult Care Food Program (CDPHE-CACFP) and flexibilities available to sponsoring organizations of family day care homes and unaffiliated child care centers pertaining to 5-day reconciliation practices. Overall, the intent of these changes is to improve efficiency during facility monitoring visits by sponsoring organizations, align CDPHE-CACFP practices with those of sponsoring organizations, maintain a high level of integrity, achieve an improved CACFP experience for participating centers and family day care homes, and promote a positive image of the CACFP within regulations.

The provisions in this memorandum do not apply to at-risk afterschool programs, homeless/emergency shelters, or adult day care programs.

Attendance records flexibilities

USDA policy, CACFP #15-2013, dated July 26, 2013, reminds State agencies and sponsoring organizations that sign-in and sign-out records are not a Federal CACFP requirement to document daily attendance. The policy acknowledges that other acceptable methods for verifying attendance during the 5-day reconciliation, such as billing, may be less burdensome for centers and homes. Because sign-in and sign-out sheets remain a licensing requirement for licensed child care facilities, enforced by the Colorado Department of Human Services, Division of Early Care and Learning, the CDPHE-CACFP and Colorado CACFP sponsoring organizations must continue to emphasize this message during compliance reviews and monitoring. However, effective immediately, the CDPHE-CACFP may use valid alternate attendance records to complete the 5-day reconciliation during State agency reviews of centers and family day care homes when sign-in and sign-out sheets are missing entries. Colorado CACFP sponsoring organizations may also adopt this flexibility during monitoring visits, if desired.

During the 5-day reconciliation, the CDPHE-CACFP will initially use sign-in and sign-out records as the attendance records because they are readily available in family day care homes and child care centers. If sign-in and sign out entries are not available for the entire day or day(s) for a child, the CDPHE-CACFP staff will ask for Child Care Assistance Program (CCAP) billing and/or attendance documentation, if applicable, to verify attendance. If CCAP billing and/or attendance records are not available, the CDPHE-CACFP staff will determine whether the center or home provider's method of billing for child care services is based on the actual days care is provided. If the center or family day care home uses this method, the CDPHE-CACFP staff may ask for this documentation and may accept it, if valid. Lastly, the



CDPHE-CACFP may conduct household contacts according to the CDPHE-CACFP household contact policy to validate meal counts. In most cases, if attendance records (sign-in and sign-out records, CCAP billing or attendance records, or child care services billing records) are not available to verify attendance for the day, the CDPHE-CACFP will disallow the meals claimed for the child. Federal regulations require current and complete attendance records and meal counts. The CDPHE-CACFP will take further action to resolve record-keeping compliance issues if needed.

Colorado CACFP sponsoring organizations may adopt the CDPHE-CACFP procedures described above during monitoring visits of family day care homes and centers, or choose to use only sign-in and sign-out records and base disallowances on these records alone. Sponsoring organizations of family day care homes and centers must reflect the selected method in their management plans and apply the procedures consistently for all sponsored facilities.

Criteria for valid alternate attendance records:

- Any alternate attendance record must clearly reflect the date and time the child was in care.
- CCAP billing and attendance records must be official documents used in the billing process between the family day care home or child care center and the county CCAP office.
- Child care services billing records used to collect child care fees from families must clearly indicate dates and times children were in care. Use of billing records as an alternative attendance record is only allowed if the center or home uses fee for service methods for billing, or only charges families for the actual care provided. Billing records are not acceptable if the child care home or center charges families a weekly or monthly tuition, regardless of whether the child receives care on all days of the billing period.
- Household contacts (if used) must be completed according to the household contacts policies and procedures of the CDPHE-CACFP and sponsoring organizations.

5-day reconciliation documentation requirements

Sponsoring organizations of family day care homes and child care centers must provide the following 5-day reconciliation documentation on the monitoring form when completing the 5-day reconciliation. This documentation is consistent with CDPHE-CACFP required documentation during State agency reviews.

- Dates for which the 5-day reconciliation was conducted;
- Description of any alternate attendance records used to conduct the 5-day reconciliation other than sign-in and sign-out records;
- Results of the 5-day reconciliation, clearly noting the absence of discrepancies or the discrepancies found and disallowances that will occur;
- Documentation of household contacts if used, according to sponsoring organization household contact documentation policies; and
- Names of children included in the 5-day reconciliation sample for child care centers monitoring visits only. Documentation of names of children are not required for family day care homes because all children claimed during the 5-day period selected must be included in the sample.



Attendance records for provider's own children (sponsoring organizations of family day care homes only)

Current Colorado licensing regulations for family day care homes do not require sign-in and sign-out records for provider's own children. However, USDA guidance does not exempt family day care home providers from the CACFP attendance record requirements for their own children that are enrolled for care and for whom meals are claimed. The USDA Food and Nutrition Service Mountain Plains Regional Office confirmed on November 22, 2013 that if the provider's own children are enrolled and the provider claims meals served to them, the 5-day reconciliation requirements are the same as for other enrolled children.

In consideration of the attendance record flexibilities allowed according to this memorandum, family day care home providers caring for their own children must keep a current record of attendance (in any format) to demonstrate their children's presence during claimed meals. This record must be separate from meal counts, and must clearly demonstrate the child was in attendance at the time of the claimed meal. Sponsoring organizations must use the attendance record, Child Enrollment Form, and the meal counts for provider's own children for the 5-day reconciliation during monitoring visits.

Meal disallowance on days with a partial attendance record

USDA policy and guidance does not address disallowance procedures if only a partial attendance record exists for a particular day. Examples of partial attendance records are when a child is signed in at the beginning of the day, but not signed out at the end of the day, or when a child is signed out at the end of the day, but not signed in at the beginning of the day. In these situations, the CDPHE-CACFP strives to implement a reasonable disallowance approach while upholding integrity in the program.

When only a partial attendance record is available for a child on a particular day, the CDPHE-CACFP will review the Child Enrollment Form (in family child care homes only) and sign-in and sign-out records (in centers and homes) for other days to determine the usual days and times the child is in care. If the child's usual days and time in care is consistent with the meal service in question, the CDPHE-CACFP will not disallow meals served on that day. If the usual days and times in care are not consistent, the meal served closest to the missing entry (sign-in or sign-out) will be disallowed. This procedure will only occur if the missing sign-in or sign-out entry is an isolated and infrequent error. The results of this assessment will be documented. As indicated above, if attendance records do not support the attendance of the child for the entire day, all meals will be disallowed.

According to the reviewer's judgment, if partial daily sign-in and sign-out records are not isolated problems, but occur more frequently, the CDPHE-CACFP will request other allowed alternate attendance records to verify attendance for the days in question. If these records do not verify attendance, the CDPHE-CACFP will disallow meals in question.

If desired, sponsoring organizations of family day care homes and centers may adopt the CDPHE-CACFP disallowance procedures for partial attendance records as described above, according to the determination of whether missing entries occur in isolation or more frequently. Federal CACFP regulations require institutions and participating facilities to maintain current, accurate, and complete records at all times, including attendance records and meal counts. If record keeping compliance issues are more frequent than isolated and/or



severe in nature, or are not resolved by the facility according to corrective action plans, the CDPHE-CACFP and sponsoring organizations must execute corrective action and resolution processes required by Federal regulation. Disallowances must occur as described in this memorandum.

Use of the Minute Menu Sponsor Review Worksheet (sponsoring organizations of family day care homes only)

To improve efficiency during family day care home visits, sponsoring organizations may use the Minute Menu Sponsor Review Worksheet during the 5-day reconciliation if desired. However, the sponsoring organization monitors must continue to verify that the family day care home provider maintains copies of Child Enrollment Forms on site.

Please contact the CDPHE-CACFP office at 303-692-2330 with questions.

