



COLORADO

Department of Public
Health & Environment

*** CDPHE-CACFP PROCEDURE MEMO CENTERS #15-23 ***

*** CDPHE-CACFP PROCEDURE MEMO FDCH #15-19 ***

DATE: August 13, 2015
MEMO CODE: FDCH #15-19, CENTERS #15-23
SUBJECT: Colorado CACFP reimbursement disallowance procedures
TO: CACFP sponsoring organizations of family day care homes and unaffiliated child care centers

The intent of this memorandum is to communicate immediate actions of the Colorado Department of Public Health and Environment, Child and Adult Care Food Program (CDPHE-CACFP) to align CDPHE-CACFP reimbursement disallowance procedures with current United States Department of Agriculture (USDA) policies. The CDPHE-CACFP takes these actions to prepare for the implementation of the final rule for the new USDA CACFP Meal Patterns.

Effective immediately, the CDPHE-CACFP not disallow reimbursement for non-compliance with Colorado-specific nutrition policies for any CACFP institution or sponsored facility. Similar to the Healthier Meals Initiative policies pertaining to whole grains, 100% juice, and certain processed and pre-fried meats, the policies described in this memorandum remain in effect as USDA approved additional state agency policies, but without financial consequence. This change in procedure will allow for a smoother transition to the new meal pattern requirements when released. Sponsoring organizations may adopt these disallowance procedures for consistency, if desired.

Similar to the Healthier Meals Initiative policies, the CDPHE-CACFP will not disallow for non-compliance with the following USDA-approved Colorado-specific nutrition policies. Sponsoring organizations must refer to these guidelines as policies when communicating with sponsored facilities.

- **Requirement to serve a second meat/meat alternate when peanut butter is served:** This requirement is highly suggested in the *USDA Crediting Handbook for the Child and Adult Care Food Program* and remains a Colorado-specific nutrition policy; however, disallowance of reimbursement will not occur for non-compliance.
- **Limit of creditable chips, including plain tortilla chips, to no more than twice per week on the menus:** Very few types of chips are allowable in the *USDA Crediting Handbook for the Child and Adult Care Food Program*. The Guide also states certain chips are high in fat and sodium, and present choking risks. This limit on chips remains a Colorado-specific nutrition policy; however, disallowance of reimbursement will not occur for non-compliance.



- **Limit of portion size for raisins and other dried fruits:** The *USDA Crediting Handbook for the Child and Adult Care Food Program* recommends only serving smaller portions (no more than 1/8 cup) of raisins and other dried fruits, and that other fruits and/or vegetables supplement this smaller portion. This remains a Colorado-specific nutrition policy; however, disallowance of reimbursement will not occur for non-compliance.
- **Requirement for whole milk for children ages 12-24 months:** The *USDA Crediting Handbook for the Child and Adult Care Food Program* states that pediatric nutrition authorities agree that children under the age of 2 years should not have low-fat or fat-free milk. This remains a Colorado-specific policy; however, disallowance of reimbursement will not occur for non-compliance. If a parent prefers an allowable milk that is not whole milk for a child in this age group, the CDPHE-CACFP recommends the facility obtain written documentation of the request from the parent. A physician's note is not required, as this policy is not a USDA requirement.

Sweet grain products

The CDPHE-CACFP received confirmation from the USDA Mountain Plains Regional Office that the USDA has adopted the Colorado-specific nutrition policy limiting the service of sweet grain products to twice per week, as stated in the *USDA Crediting Handbook for the Child and Adult Care Food Program*. The guide also specifies which grain products this pertains to. Therefore, this Colorado-specific nutrition policy remains in effect, and the CDPHE-CACFP will continue to deduct reimbursement for meals containing these products once the frequency of service exceeds twice per week. The CDPHE-CACFP will determine the number of times these products were served in excess of the limit, and of all the meals containing these products, will deduct the meal(s) or snack(s) that earned the least reimbursement. No Federal or Colorado-specific policy states these foods cannot be served as an extra food, in addition to a reimbursable meal.

This memorandum refers to the *USDA Crediting Handbook for the Child and Adult Care Food Program*. The CDPHE-CACFP intends to formally adopt this handbook in the near future. In the coming months, the CDPHE-CACFP will discuss aspects of this implementation with sponsoring organizations and determine the final process based upon these discussions.

Please contact the Nutrition Consultant assigned to the institution for questions pertaining to disallowance procedures described in this memorandum.

