

2019 Mandatory Training

Documentation Requirements for the Child and Adult Care Program Meal Patterns

Instructions for Offline Users

The 2019 mandatory training may be completed by self-study packet. After taking the course, complete the test and evaluation. (The evaluation is optional.) Email a copy of your completed test and evaluation to fcc.calpronet@fresnocitycollege.edu, or mail the original test and the evaluation, along with your contact information to:

Fresno City College (FCC) Cal-Pro-NET Center, 1101 E. University Ave., Fresno, CA 93741. Include your name, agency name, agency CNIPS number, and mailing address. The deadline for the FCC Cal-Pro-NET Center to receive all tests is June 22, 2019.

In order to receive a certificate of completion, you must have an account with the FCC Cal-Pro-NET Center and be registered in the correct offline course. If you don't have one, create an account at https://online.fresnocitycollege.edu/calpronet/createaccount.asp. Register for the online course at https://online.fresnocitycollege.edu/calpronet/loginscreen.asp. Make sure you select the offline course, and not the online course (indicated under "Method").

Once your test has been graded, and you have achieved a passing score of 75 percent or higher (24 or more points out of a possible 32), the corrected test will be emailed or mailed back to you. After your certificate has been issued, you will receive an email with instructions explaining how to print it. You should expect this email within two weeks. If you have not received notification during that time, please contact the FCC Cal-Pro-NET Center by phone at 559-489-2237 or email at fcccalpronet@fresnocitycollege.edu.

Thank you. Linda Shelton, MS, RD Coordinator

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2019 Mandatory Training Course Evaluation

Documentation Requirements for the Child and Adult Care Food Program Meal Patterns

- 1. This course helped me understand the documentation requirements for the Child and Adult Care Food Program meal patterns.
 - Strongly agree
 - o Agree
 - Neither agree nor disagree
 - o Disagree
 - Strongly disagree
 - Not applicable
- 2. The course adequately covered the topic.
 - Strongly agree
 - o Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Not applicable
- 3. I would recommend this course to others.
 - Strongly agree
 - o Agree
 - Neither agree nor disagree
 - o Disagree
 - Strongly disagree
 - Not applicable
- 4. What is the main reason you took this course?
 - Required by my employer and/or job training
 - Required by my agency's Child Nutrition Consultant
 - o Wanted to increase my knowledge of procurement requirements in the CACFP
 - Other _____

5. What did you learn from this course that will help you better comply with the documentation requirements for the Child and Adult Care Food Program meal patterns?

6. Please provide any additional comments or suggestions you would like to share with us.

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Introduction

The US Department of Agriculture (USDA) updated the Child and Adult Care Food Program (CACFP) meal patterns effective October 1, 2017. The Nutrition Services Division (NSD) of the California Department of Education (CDE) has worked very hard spanning many months to develop a policy on documentation requirements for the CACFP meal patterns. The new policy is Management Bulletin (MB) CACFP-02-2018 Documentation Requirements for the CACFP Meal Patterns. This policy makes clear the requirements for CACFP operators without additional paperwork. The NSD has also worked extensively with the Field Services Unit regarding these requirements, outlined in the following management bulletin (MB). The Field Services Unit has been key to this process since its staff conduct CACFP Administrative Reviews (AR) with each CACFP agency every three years and have helped ensure that documentation requirements are reasonable. The NSD has also spent time conferring with other states on their policies and practices surrounding how they determine if their CACFP centers and day care homes "demonstrate that they are serving meals that meet the meal pattern requirements".

At the end of this course, participants will be able to:

- Demonstrate an understanding of the new CDE MB CACFP-02-2018: Documentation Requirements for the CACFP Meal Patterns
- List meal pattern documentation requirements for each part of the CACFP Administrative Review
- Describe specific food item documents that will be reviewed during an Administrative Review on "the day of onsite meal observation"

Background

This MB was created to support the updated CACFP Meal Patterns (*7 CFR*, section 226.20) that went into effect October 1, 2017, and to help program operators demonstrate that they are serving meals that meet the meal pattern requirements. Regulations that require CACFP operators to keep records of menus have already been in effect. The USDA recently authorized state agencies to determine other types of acceptable recordkeeping documents and asked that states not impose additional paperwork. The CDE has simplified its AR process and outlined it in the MB.

CDE Management Bulletin CACFP-02-2018

The CDE MB CACFP-02-2018: Documentation Requirements for the CACFP Meal Patterns ☑, located on the CDE CACFP Bulletin web page at https://www.cde.ca.gov/ls/nu/cc/mbcacfp022018.asp, describes specific requirements for the California CACFP operators to demonstrate compliance with the meal patterns. It includes a Meal Pattern Documentation Checklist for CACFP operators to use. This MB supersedes CDE MB CACFP–07-2017: Clarification on Documenting Meals in the CACFP. It is based on regulations in 7 Code of Federal Regulations (CFR), Section 226.15(e) and other USDA Policy Memoranda.

Definition of CACFP Terms

The term "program operators" used in this MB refers to all entities that provide meals and snacks as part of participation in the CACFP. Program operators include all types of centers (licensed child and adult care centers, at-risk afterschool programs, emergency shelters) and all day care home (DCH) providers.

There are some requirements that do not pertain to DCH providers since DCH sponsors do not provide meals and snacks as part of participation in the CACFP. In these scenarios, the requirement will refer to centers only. However, DCH sponsors are responsible for ensuring that DCHs comply with the documentation requirement outlined in this MB.

Some requirements do not pertain to all types of centers, for example at-risk afterschool programs and emergency shelters. In these scenarios, the requirement will directly refer to centers to whom the requirement applies, and exclude other specific types of centers by name.

Meal Pattern Documentation Checklist (Form ID CACFP 89)

The Meal Pattern Documentation Checklist is a great tool and companion piece to the MB for CACFP operators. The CDE created a two-page checklist that summarizes the meal pattern documentation requirements. It can be used by CACFP operators to prepare for an AR and to highlight areas that may need improvement.

The Meal Pattern Documentation Checklist and all other sample forms provided by the NSD and referenced in the MB can be found in the Download Forms section of the Child Nutrition Information & Payment System (CNIPS) ^I at https://www.cnips.ca.gov/.

Detailed information about the <u>CACFP Meal Patterns</u> I is located at https://www.cde.ca.gov/ls/nu/he/cacfpresource.asp.

Documentation Requirements: Categories

The MB CACFP-02-2018 outlines documentation requirements for the following 11 topics:

- 1. Infant Participation
- 2. Child and Adult Menus
- 3. Menu Production Records (MPRs)
- 4. Creditable Food Components and Food Items
- 5. Meal Modifications for Participants Without a Disability
- 6. Meal Modifications for Participants with Disabilities
- 7. Declining Participation in the CACFP
- 8. Transport Records
- 9. Meal Receipts and Allowable Costs
- 10. Record Retention
- 11. Policies and Procedures

Each section also clearly states the requirement, sample forms that may apply, helpful tips, best practices, and notes providing clarification.

Section One: Infant Participation

This section pertains to documentation requirements related to infant participation. All program operators **must**:

a. Offer CACFP benefits to all infants enrolled in child care. This is not a new requirement. Program operators do not have the option of limiting participation in the CACFP to children only.

Per USDA Policy CACFP 02-2018 Feeding Infants and Meal Pattern Requirements in the CACFP; Questions and Answers:

- A center or day care home may not avoid this obligation by stating that the infant is not "enrolled" in the CACFP or by citing logistical or cost barriers to offering infant meals.
- Decisions on offering program meals must be based on whether the infant is enrolled for care in a participating CACFP center or day care home, not if the infant is enrolled in the CACFP.
- b. Notify parents or guardians that an iron-fortified infant formula is offered at **no charge.** This can be done by either:

- including a notification in a parent handbook, on the enrollment record, on the agency's website, or another document available to parents; or
- obtaining the signature of a parent or guardian who provides an alternate infant formula acknowledging that the parent or guardian is declining the program operator's infant formula. An operator could use the Sample CNIPS Form, CACFP 12, *Parent/Guardian's Form for Declining a Provider's Infant Formula or Food,* found in the Download Forms section of the CNIPS, or an operator could develop a new form.

c. Maintain daily meal records for infants (zero through eleven months old) for all meals and snacks claimed for reimbursement.

The daily meal records **must** document the following:

- The type of infant meal offered (breastmilk, infant formula, or a combination of both)
- The name of all solid foods offered when infants are developmentally ready to accept them (for example, carrots: 1 Tablespoon)
- The quantity of expressed breastmilk or infant formula offered, and
- The quantity of all solid foods offered regardless of the age of the infant (DCH providers are exempt from this requirement)

There is a sample form, CACFP 32, Individual Infant Meal Record, in the CNIPS that an agency may use or an agency may develop its own form.

d. Label expressed breastmilk with the infant's name and the date the milk was expressed.

Note: Program Operators should not store breastmilk in a refrigerator for more than 72 hours after being expressed.

e. Include the current version of the federal Nondiscrimination Statement on menus if menus are available to the public and the menus contain other information regarding the CACFP.

- The short statement can be used on menu documents that are one page in nature.
- The Short Nondiscrimination Statement is:

This institution is an equal opportunity provider.

Scenario A

An eight-month old infant in an agency's care has fully transitioned to solid foods. The parent asks the program operator not to offer the infant any fruits or vegetables because they are upsetting the infant's stomach.

Question: What should the program operator do?

Answer: The CACFP operator should respect the parent's wishes and not offer the infant fruits or vegetables for that day.

USDA Policy Memo CACFP 02-2018 Feeding Infants and Meal Pattern Requirements in the CACFP; Questions and Answers (dated October 2017) is an excellent resource for these types of concerns with infants.

Meals should not be disallowed simply because one food component was offered one day and then not the next day, if consistent with the infant's eating pattern and the parent's wishes. All infants should be served formula or breastmilk for meals and snacks for reimbursement. However, other components that are listed with ranges in the meal pattern (for example, 0-4 tablespoons fruit) are totally flexible with serving sizes and the eating pattern of the infant.

As infants gradually transition to solid foods when developmentally ready, program operators are not required to offer all meal components on the meal pattern. Some food items on the meal pattern list a range for the portion size, such as 0-4 tablespoon infant cereal. This allows program operators the option to offer the food item or meal component during this transition.

Best Practices for Infant Meals (Optional)

Some best practices for infant meals include:

- Indicating whether an infant was breastfed onsite or offered expressed breastmilk
- Sharing with parents or guardians the American Academy of Pediatrics guidelines for determining when an infant is developmentally ready for solid foods:
 - \circ Infant is able to sit in a high chair, feeding seat, or infant seat with good head control
 - o Infant opens his or her mouth when food is offered and comes into view
 - o Infant can move food from a spoon into his or her throat, and

- Infant has doubled his or her birth weight and weighs about 13 or more pounds
- Communicating frequently with infant's parent or guardian about when to introduce solid foods
- Obtaining written documentation from the parent or guardian to show infant's preferences for what solid foods to offer

Section Two: Child and Adult Menus

All program operators must

a. Maintain dated, daily menus for children and adults that demonstrate compliance with the meal pattern requirements. As a reminder, <u>California Licensing Regulations</u> (Title 22, Division 12, Chapter 1, Article 6, Section 101227 Food Service), located at https://www.cdss.ca.gov/inforesources/Letters-Regulations/Legislation-and-Regulations/Community-Care-Licensing-Regulations/Child-Care, for licensed child care centers require menus to be in writing and posted at least one week in advance.

Note: DCH providers can meet the requirement to maintain daily menus by entering menu items each day into an electronic data base or by maintaining a daily written menu

b. List the food items served on the menu to document that meals and snacks include the required meal pattern components.

For example, the meal pattern for a child breakfast includes these food components:

- Milk
- Grain
- Fruit or vegetable or a combination of both

So, a sample menu might include the food items:

- 1 percent milk, unflavored
- Cheerios cereal
- Sliced strawberries
- c. Specify on the menu or MPR the fat content of the milk served, and whether the milk is flavored or unflavored for each age group.

- When adult day care or at-risk afterschool centers use offer versus serve and offer different types of milk, the menu **must** reflect all the types of milk offered. A notation on the bottom of the menu can satisfy the milk documentation requirement. Examples are listed below:
- Licensed child care centers:

Whole unflavored milk is served to children one year of age and 1 percent unflavored milk is served to all children two years of age and older.

• Unlicensed at-risk afterschool centers:

Children age six and older are offered a choice of 1 percent unflavored milk or fat-free flavored milk. Children age five and younger are only offered 1 percent unflavored milk.

Reminder: In California, the Healthy Beverages in Child Care Act does not allow licensed child care centers to serve flavored beverages to children of any age.

d. Identify at least one food item on the menu or MPR per day which meets the criteria for whole grain-rich (WGR).

Note: Please see USDA Policy Memo CACFP 09-2018: <u>Grain Requirements in</u> the CACFP: Questions and Answers C (PDF) located at https://fnsprod.azureedge.net/sites/default/files/cacfp/CACFP09_2018os.pdf for more information on the WGR criteria.

Day Care Home providers that input more than two meals and one snack, or two snacks and one meal into a system that determines which meals and snacks are submitted for reimbursement, are responsible for ensuring one daily meal or snack claimed for reimbursement includes a WGR item.

Suggestions for clearly identifying the WGR item on the menu include:

- Writing WGR after the food item
- Highlighting or bolding the WGR food item on the menu
- Using an asterisk after the WGR item with an accompanying notation at the bottom of the menu indicating the asterisk represents WGR

- e. Limit meat and meat substitutions for the entire grain component on the breakfast menu to no more than three times per week.
- f. Limit fruit or vegetable juice that is used to meet the vegetable or fruit component to one meal or snack per day.
- g. For Adult Day Care Only: Limit yogurt as a substitution for milk on the menu to no more than once per day.
- h. Indicate menu substitutions by:
 - Handwriting the substitution directly on the menu, MPR, or transport records
 - Updating the menu electronically to reflect the substitution
 - Developing another method of documentation to show what was actually served
- Exclude deep-fat fried foods on the menu when meals and snacks are prepared onsite. Meals prepared in a central kitchen are also considered onsite. Deep-fat fried foods are defined as cooking by submerging food in hot oil or other fat.
- j. Exclude grain-based desserts on the menu for the grain component at any meal or snack. The Dietary Guidelines support reducing sugars in our diet. Grain-based desserts cannot credit toward a reimbursable meal or snack and cannot be purchased with program funds. Grain-based desserts are considered an "extra" food.

Grain-based desserts have a superscript 3 or 4 in Exhibit A of the <u>USDA's Food</u> <u>Buying Guide for Child Nutrition Programs</u> ^I (PDF) located at https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/ExhibitA.pdf.

Examples of grain-based desserts include:

- Cookies
- Doughnuts
- Cereal bars
- Breakfast bars
- Granola bars
- Sweet rolls
- Toaster pastries
- Cake
- Brownies

Note: Sweet crackers (Exhibit A, Group B), which includes graham crackers and animal crackers only, are NOT grain-based desserts and therefore can be served in the CACFP.

k. Include the current version of the federal Nondiscrimination Statement on the menu if the menu is available to the public and it contains other information regarding the CACFP. The short statement can be used on menu documents that are one page in nature.

The Short Nondiscrimination Statement is:

This institution is an equal opportunity provider.

Best Practices for Child and Adult Menus

Best practices for child and adult menus (optional):

- Listing the quantities of each food component on the menu (for example, ¹/₂ cup broccoli) to ensure that all food service staff are aware of the quantities required of each component needed to comprise a reimbursable meal
- Suggesting all CACFP agencies display menus in a public location to ensure that parents, guardians, or other household members can view what food items are offered

Reminder: California regulations for licensed child care centers require menus to be posted one week in advance.

Section Three: Menu Production Records

All centers, with the exception of at-risk afterschool centers and emergency shelters, must maintain daily MPRs for children age twelve months and older and for adults in adult day care to verify that the quantity of food prepared meets the minimum size in the meal pattern for each age group. A sample form is CACFP 28, Agency Menu Production Record—Centers, is located in the Download Forms section of the CNIPS.

The following details need to be included on the MPR:

- Number of children and adults estimated to be served by age group and the actual number served
- Menu and serving size per age group
- Specific food items such as apple or apple juice, instead of fruit or juice, that are used to meet the meal pattern components

- Purchase unit and servings per purchase unit
- Estimated quantity to prepare and the actual quantity prepared
- Amount of leftovers, which may be used in another meal or snack, if applicable

Note: Program operators who keep the original milk carton(s) in an ice bath at or near the table (to maintain the temperature of the milk at 41 degrees or below during the meal service) and return the unused portion of milk to the refrigerator, must ensure that the MPR reflects the quantity of milk that was returned to the refrigerator (leftover) to be served in a future meal or snack. Agencies should consult with their local health department to determine whether maintaining the original milk carton(s) in an ice bath during meal service complies with local health and safety rules.

Section Four: Creditable Food Components and Food Items

A food component is one of the food groups that comprise a reimbursable meal. There are five food components: grains, fruits, vegetables, milk, and meat or meat alternates. A food item is a specific food offered within the food components. For example, oatmeal is a food item within the grain food component. An apple is a food item within the fruit food component. Broccoli is a food item under the vegetable component. Yogurt is a food item within the meat and meat alternate food component.

Documentation Requirements Based on the Three Parts of the Administrative Review

There are three different time frames within an AR used to determine whether the meal pattern requirements are met. The first time frame is the **month of the AR**. During this time the monthly menu will be looked at broadly to make sure all food components are listed. The second time frame will include looking closely at the **menu for a one-week period** to verify that minimum quantities of foods and beverages are included. During the third time frame, which is usually an unannounced visit, **onsite meal observation** and one day's menu will be looked at in detail to determine whether all of the meals and snacks served are creditable. Food package labels and quantities will also be checked during this onsite meal observation.

The Administrative Review–Month of Review

The first step of the AR entails a reviewer contacting an agency to determine a time to do an AR. To establish the AR month, a reviewer will ask which month will be the last claim for reimbursement submitted. This month will then be the AR month.

During an administrative review, the reviewer will ask to see the menu for the month of the AR. The program reviewer will check that all components were included for all meals and snacks. In addition, program reviewers will check:

- 1. The type of milk, and whether it is flavored or unflavored for each age group is documented on the menu
- 2. Deep-fat fried foods are not on the menu if meals and snacks are prepared onsite
- 3. At least one food item per day, on the menu or MPR is identified as WGR
- 4. Grain-based desserts are not on the menu for the grain component
- 5. Program operators are not substituting a meat or meat alternate for the grain component at breakfast on the menu more than three times per week
- 6. Vegetable or fruit juice on the menu is only used to meet the vegetable or fruit requirement once per day
- 7. Yogurt is on the menu to meet the milk requirement only once per day (allowable in adult day care only)

Note: The only document required for this review is the menu (and the MPR if milk and WGR items are documented on the MPR only).

The Administrative Review—One Week Menu Review

The second step of the administrative review is a closer look at what was served during one week of the AR month. The reviewer, who selects the week, will look at the types and quantities of food served and verify that they met the meal pattern requirements.

The following questions will be asked:

- 1. Do MPRs, if required, show that the quantity of milk, quantity of fruits and vegetables, and quantity of meat or meat alternates met the meal pattern requirements?
- 2. Are Child Nutrition (CN) labels or product formulation statements (PFS) available for processed meat or meat alternates and combination foods?
- 3. Are standardized recipes available when food items are made from scratch?

These questions are not new and have been asked in the past during an AR.

In addition to the items mentioned above, program reviewers may also ask for transport records, receipts for food and beverages, medical statements, and documentation of parent-supplied food at any point during an administrative review.

Note: Program reviewers may ask for any type of documentation at any point during an administrative review.

Scenario B

An agency served chicken nuggets during the week of the menu review.

Question: How does an agency demonstrate that the grain and meat or meat alternate components were creditable?

Answer: If it is a processed food, it must have a CN label or a PFS. Either a CN label or PFS are required for processed foods to demonstrate the contribution(s) to the meal pattern during the menu review for one week. If it was made from scratch, the standardized recipe will be required.

The Administrative Review–Onsite Meal Observation

During the third step, program reviewers will take a more detailed look at what is being served on the day of the onsite meal observation. If the day of the onsite meal observation is not during the month of the administrative review, program operators will need to verify that quantities served met the meal pattern requirements by reviewing the MPR for that day.

Typically, program reviewers will visit the site unannounced, and the visit will include an observation of meal or snack service.

On the day of the onsite meal observations, program reviewers will request the original, or copies of, product packages from foods and ingredients used in standardized recipes for meals and snacks served on that one day. **Product packages must include the Nutrition Facts label and ingredients list**, or any other information that verifies compliance with the meal pattern requirements. Reviewers will look at food package labels to ensure that all food items are creditable. If the reviewers are present during the meal service, they will also make a visual observation to determine if the food components are served in the minimum portions required for each age group. If food packages are not available (for example, the center has vended meals or a central kitchen), the program operator will have five days to provide their program reviewer with the requested documentation.

Creditable Food Components and Food Items

During the **onsite visit meal observation**, the program reviewer will investigate, by **reviewing food package labels**, whether the following food components and food items on the menu that day are creditable:

- Infant formula
- Infant cereal and ready-to-eat cereals for infants
- Milk
- Nondairy milk substitutes
- Grains (creditable, WGR, and breakfast cereals)
- Tofu and yogurt
- Meat and meat alternates, processed meat and meat alternates, and combination foods

Infant Formula

The requirements for infant formula have changed. Prior to October 1, 2017, program operators were required to offer at least one formula that was included on a list provided by USDA. This list is no longer available.

Program operators may provide an infant formula of their choice to participants as long as it contains at least one milligram of iron per 100 calories and is regulated by the Food and Drug Administration (FDA). All infant formula sold in the United States must be regulated by the FDA. If purchased outside of the United States, formula is not regulated by the FDA. The reviewer will need to verify the formula is creditable by reviewing the Nutrition Facts label.

Scenario C

A parent brings an agency an infant formula that was purchased in Mexico. The label is in Spanish, but appears to meet the iron requirement.

Question: What should the agency do?

Answer: Only infant formula sold in the United States is regulated by the FDA. The agency should tell the parent that the formula is not creditable for reimbursement with the CACFP. The agency could:

- ask the parent to bring in another formula;
- ask the parent to choose the formula the agency offers; or
- have the parent decline participation in the CACFP.

Cereal and Ready-to-Eat Cereals Served to Infants

Infant cereal that is served at meals and snacks must be made from dry, iron-fortified infant cereal.

It is only allowable to offer ready-to-eat cereal at snack time to infants. The ready-to-eat cereal must be either fortified or made from enriched or whole grain meal or flour and contain no more than six grams of sugar per dry ounce. This is the same requirement as ready-to-eat cereals for children and adults. To verify this, the program reviewer will ask to see the food package label ingredient list with the Nutrition Facts label.

Milk

The milk served to participants must meet the fat content appropriate for each age group. Flavored milk must not be served to participants five years of age and younger. To verify this, the program reviewer will ask to see the food package label ingredient list with the Nutrition Facts label.

In California, the Healthy Beverages in Child Care Act (Assembly Bill 2084) prohibits flavored beverages to be served to children in licensed child care centers or homes.

Nondairy Milk Substitutes

The requirements for nondairy milk substitutes served to participants has not changed. Any nondairy milk substitute served without a medical statement must be nutritionally equivalent to milk. The nondairy package label must be available for a reviewer to verify that the nutrients in that milk meet the required amounts in the regulations. Letting a reviewer know the name and brand of the nondairy milk substitutes alone will not meet the documentation requirement. The reviewer will need to see the Nutrition Facts label. The regulations also require that a parent or guardian submit a written request for nondairy milk substitutes. In the past, program operators were required to have parents submit the form CACFP 49, titled Request for a Fluid Milk Substitute, located in the Download Forms section of the CNIPS. This form includes the parent's signature. While a written request with signature is still required, the NSD has determined that a specific form is not required. The form, CACFP 49, can still be used if desired. A written request may also be incorporated into an existing document, such as an enrollment record.

Note: The NSD is providing this option to reduce paperwork. A written request is still required, but where an agency obtains the parent signature is up to the agency for nondairy milk substitutes.

Creditable Grains

All grains served for the grain component in meals and snacks must be made from enriched or whole grain meal or flour, bran or germ. They must also meet the minimum quantities as specified in the meal patterns.

An agency must have the Nutrition Facts labels available for all grains served on the day of the onsite meal observation.

Whole Grain-Rich Food Items

During the onsite meal observation, program reviewers will check to make sure that one serving of a WGR food item is on the menu for that day and it meets the WGR criteria. There are many ways to determine whether a grain is WGR as outlined in the USDA Policy Memo CACFP 09-2018, Grain Requirements in the CACFP, Questions and Answers.

The documentation required to demonstrate that a food item meets the criteria for WGR will depend upon the method used to determine whether the food item is WGR, as described in this USDA policy memo.

Breakfast Cereals

Breakfast cereals must contain no more than six grams of sugar per dry ounce and must be fortified or made from enriched or whole grain meal or flour. If breakfast cereals are on the menu at breakfast on the day of the onsite meal observation, program reviewers will verify that the breakfast cereals meet these new requirements.

To verify this, the program reviewer will ask to see the food package label ingredient list with the Nutrition Facts label. If the breakfast cereal is on any state agency's Women, Infants, and Children (WIC) Supplemental Nutrition Program Authorized Food List Shopping Guide, the reviewer will not need to see the label as all cereals listed in the WIC shopping guide meet the sugar threshold.

Tofu

Tofu is now allowable for children and adults with some restrictions. If tofu is on the menu on the day of the onsite meal observation, program reviewers will ask for the tofu package with the Nutrition Facts label to verify that the tofu:

• is commercially prepared;

- easily recognizable as a meat substitute (for example: sausage links, tofu chunks in a stir fry); and
- contains at least five grams of protein per 2.2 ounces (equivalent to ¼ cup).

Yogurt

The updated meal pattern includes a requirement that limits the amount of sugar in yogurt served to participants. The requirement states that yogurt must not contain more than 23 grams of sugar per six ounces. The original or a copy of the product package with the Nutrition Facts label must be available. If yogurt is on the day's menu, the program reviewer will ask for the container to verify that the yogurt does not contain more than 23 grams of sugar per six ounces.

Meat and Meat Alternates

Meat and meat alternates must be listed in the <u>USDA Food Buying Guide for Child</u> <u>Nutrition Programs</u> located at <u>https://www.fns.usda.gov/tn/food-buying-guide-forchild-nutrition-programs or the most current <u>Crediting Handbook for the CACFP</u> (<u>PDF</u>) located at <u>https://www.cacfp.org/files/9914/4240/2457/CACFP creditinghandbook.pdf</u>.</u>

Processed Meat and Meat Alternates and Combination Foods

Processed meat and meat alternates and combination foods such as pizza, burritos, and chicken nuggets must have a CN label or a PFS signed by the manufacturer, which verifies the product's contribution to the meal pattern requirements.

Scenario D

On the day of the onsite meal observation, an agency served yogurt but threw the container in the trash.

Question: What should the agency do?

Answer: The agency could:

- Not throw yogurt containers away until the end of the day
- Photocopy the yogurt container label and post it on the refrigerator
- Take a picture of the container on a smartphone
- Get the carton out of the trash can

• Section Five: Meal Modification for Participants Without a Disability

For meals to be credited for participants without a disability, program operators must:

- document parent-supplied, or program operator-supplied, food or beverages;
- limit meal modifications to only one component per meal or snack; and
- ensure all food items are creditable.

A specific form is not required, but may be used. Sample forms found in the Download Forms section of the CNIPS include:

- CACFP 12, Parent/Guardian's Form for Declining a Provider's Infant Formula or Food. Two forms are now consolidated, which is new.
- CACFP 84, Parent/Guardian's Form for Declining a Provider's Food for Older Children

Scenario E

A parent brings in almond milk for a child and asks the program operator to serve it as a substitute for milk because the parent thinks it is healthier for the child. The almond milk is not nutritionally equivalent to milk.

Question: What should the agency do?

Answer: The agency could:

- Provide a soy milk that is nutritionally equivalent to milk and obtain a written request from the parent.
- Choose not to accommodate the parent's request for almond milk as it is a parental preference and not a disability.
- Ask the parent to decline participation in the CACFP and bring in all meals and snacks.

Scenario F

A parent enrolls her child in care and asks the agency to provide the child with organic fruits and vegetables. The child does not have a medical statement.

Question: What should the agency do?

Answer: The agency could:

- Provide organic fruits and vegetables.
- Choose not to accommodate the parent's request.
- Ask the parent to bring in one organic fruit or vegetable per meal or snack. (The other fruit or vegetable served will not be organic).
- Ask the parent to decline participation in the CACFP and bring in all meals and snacks.

USDA Policy Memo CACFP 14-2017, SFSP 10-2017 Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Services Program dated June 22, 2017 states that:

"Program operators have the option to accommodate special dietary needs that do not constitute a disability, including those related to religious or moral convictions or personal preference."

Section Six: Meal Modifications for Participants With a Disability

Program operators **must** make reasonable food and beverage substitutions on a caseby-case basis for individual participants who are considered to have a disability that restricts their diet.

It is required for program operators to obtain a signed medical statement when food and beverage substitutions do not meet the meal pattern requirements. The medical statement must be signed by a physician, physician assistant, or nurse practitioner and must include a description of the participant's physical or mental impairment. The description must be sufficient for a program operator to understand how it restricts the participant's diet and include an explanation of what is required to accommodate the disability.

A sample form, CNP 925, Medical Statement to Request Special Meals and/or Accommodations, is available in the Download Forms section of the CNIPS. This form was revised in August of 2018. There are no longer two boxes at the top of the form that state "disability" or "nondisability." If this form is completed, program operators should consider the participant to have a disability.

Program operators must provide at least one required component when meal modifications are made for participants with a disability. Parents and guardians may supply one or more creditable component of a reimbursable meal when there is a disability.

Note: A medical statement does not need to be updated unless there is a change in the dietary restriction.

For more information on meal modifications for participants with disabilities, access the MB, CACFP-08-2017; SFSP-02-2017, <u>Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and the Summer Food Service Program</u> ^I on the CDE CACFP Bulletin web page web page at http://www.cde.ca.gov/ls/nu/cc/mbcacfp082017sfsp022017.asp.

Scenario G

A parent brings in a completed and signed medical statement stating the child needs a gluten-free diet. The medical statement recommends specific brands of gluten-free products as a substitute for grains.

Question: What should the agency do?

Answer: The agency could provide a special meal with reasonable modifications to accommodate the disability at no charge. The exact product brands listed in the medical statement are not required as long as the modification accommodates the disability.

According to USDA Policy Memo CACFP 14-2017, SFSP 10-2017 Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Services Program, the CACFP operator is not required to provide the exact substitution or other modification requested. However, the program operator must work with the parent or guardian to offer a reasonable modification that effectively accommodates the participant's disability.

Section Seven: Declining Participation in the CACFP

Regulations do not require a parent or guardian signature when declining participation in the CACFP. Therefore, it is no longer required that a declination form be completed. However, an agency can choose to require the parent or guardian to complete a declination form, if desired. The declination forms have been consolidated. In the past, there were separate forms for children and adults in adult day care. There is currently only one form: CACFP 11, Declining Participation in the Child and Adult Care Food Program, located in the Download Forms Section of the CNIPS.

Section Eight: Transport Records

All program operators that serve food prepared offsite and delivered **must** maintain transport records. Transport records **must** have the same level of detail as found in the sample form, CACFP 66, Sample Transport Record, located in the Download Forms Section of the CNIPS.

Section Nine: Meal Receipts and Allowable Costs

Centers only **must** retain legible receipts of all food items purchased with program funds that contribute toward a reimbursable meal. Centers must purchase only creditable food items with program funds.

While condiments, herbs, and spices cannot credit toward the meal pattern requirements, condiments served with creditable foods and herbs and spices used to prepare and enhance the flavor of meals may be purchased with program funds.

Program reviewers will often review receipts and invoices to verify that the amount of milk purchased meets the minimum amount required in the meal patterns.

Centers should copy or scan receipts that fade over time to ensure that the receipt is legible during an AR.

Section Ten: Record Retention

Program operators **must** retain documents related to verification that the meal patterns are met for the current Federal Fiscal Year (FFY), October 1 through September 30, plus the prior three FFYs. These documents include:

- Menus
- Food and beverage receipts and invoices, if applicable
- MPRs, if required
- CN labels, PFS, and standardized recipes, if applicable
- Transport records, if applicable
- Medical statements, if applicable
- A written request from a parent or guardian of an infant or child or a household member of an adult participant for a nondairy milk substitute when there is no disability, if applicable

Section Eleven: Policies and Procedures

For a comprehensive and up-to-date listing of policy memos, resources, and training opportunities related to the CACFP new meal patterns, visit the CDE <u>CACFP New Meal</u> <u>Patterns</u> [→] web page located at **https://www.cde.ca.gov/ls/nu/he/cacfpresource.asp.**

In addition, the NSD has developed an online, <u>Child Nutrition Programs Course Catalog</u> , for all trainings offered, including training for CACFP operators. The web address is **https://www.cde.ca.gov/ls/nu/ed/cnpcoursecatalog.asp**. This can also be found by visiting the CDE web page and typing in "nutrition course catalog" in the search bar.

On the course catalog, staff can find training relevant to their programs. New courses will be added as they are developed. The CACFP Meal Pattern video series with seven trainings is located here. Some of the courses are: Infant Meal Pattern, Child Meal Pattern, Family Style Meal Service in the CACFP, Offer versus Serve in the CACFP, and Milk Requirements in the CACFP for Centers and Providers (English and Spanish). After completing a course, users will be directed to the course web page and asked to enter their contact information. This information will be used to generate a Certificate of Completion. A short evaluation is also at the end of each course.

Questions

Questions regarding the meal pattern documentation requirements outlined in the MB should be directed to an agency's CACFP Specialist. The CACFP Specialist list is available in the Download Forms Section of the CNIPS, CACFP 01. An agency may also contact Nancy Charpentier, the CACFP Unit Office Technician. Her phone number is 916-327-2991 or 800-952-5609, Option 3. Her email address is <u>ncharpentier@cde.ca.gov</u>.

Questions related to an AR should be directed to an agency's CACFP Child Nutrition Consultant (CNC). To identify an agency's CNC, access the Contact List and County Assignments, CACFP 01, in the Download Forms section of the CNIPS, or contact the Field Services Unit main line at 916-323-4558.

Civil Rights

Civil rights are based on the idea that everyone has the same rights and opportunities. Discrimination is defined as different treatment which makes distinction of one person or a group of persons from others, either intentionally, by neglect, or by the actions or lack of actions, based on one or more protected bases.

In the CACFP, discrimination on the basis of race, color, national origin, sex, age, or disability is prohibited.

CACFP agencies that receive federal financial assistance must understand:

- Civil rights laws
- Regulations
- Policies and procedures

For additional information, review the <u>FNS Instruction 113-1 (Civil Rights Compliance</u> and <u>Enforcement---Nutrition Programs and Activities</u>) **(PDF)**, and <u>Title VI of the Civil</u> <u>Rights Act of 1964</u>. These are federal guidelines that govern civil rights. These guidelines can be found at: https://fns-prod.azureedge.net/sites/default/files/113-1.pdf, and http://www.justice.gov/crt/about/cor/coord/titlevi.php.

Civil Rights Training

Agencies should ensure that they train all CACFP staff, including the following, on civil rights:

- Person responsible for reviewing civil rights compliance
- Frontline staff who interact with program applicants or participants
- Those who supervise frontline staff

The topics that need to be covered in civil rights training include:

- Collection and use of data
- Effective public notification systems
- Complaint procedures
- Compliance review techniques
- Resolution of noncompliance
- Requirements for reasonable accommodation of persons with disabilities
- Requirements for language assistance
- Conflict resolution
- Customer service

Civil Rights Goals

The goals of civil rights in the nutrition program are to:

- eliminate barriers that prevent or deter people from receiving benefits of a government sponsored or funded program;
- provide equal treatment in the delivery of programs and services to all applicants, participants, and beneficiaries of a federal program;
- ensure that all applicants and participants understand their rights and responsibilities; and
- show respect and dignity to all.

USDA Nondiscrimination Statement

On November 19, 2015, the USDA updated the nondiscrimination statement. At that time all local agencies or other subrecipients were required to incorporate the USDA nondiscrimination statement into all materials and resources, including websites and published materials, used to inform the public of the CACFP. The nondiscrimination statement does not have to be included on menus unless there is other information regarding the CACFP. If there is other information about the CACFP, this is considered a program document and must include the nondiscrimination statement.

This is the current full USDA nondiscrimination statement:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at <u>How to File a Program Discrimination</u> <u>Complaint</u> and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov.

USDA is an equal opportunity provider, employer, and lender.

According to FNS Instruction 113-1, all informational materials and sources, including websites, used by FNS, State agencies, local agencies, or other subrecipients to inform

the public about FNS programs, must contain a nondiscrimination statement. It is not required that the nondiscrimination statement be included on every page of the program information website. At a minimum, the nondiscrimination statement, or a link to it, must be included on the home page of the program information.

The short statement --- "This institution is an equal opportunity provider" --- may be used on flyers, posters, or documents that are one page by nature. This must be done in a font no smaller than the text of the document.

Informational materials that require the full nondiscrimination statement include:

- Employee and parent handbooks
- Enrollment forms
- Newsletters
- Print and broadcast advertisement. Any radio, television, or internet ads should state: "The [agency name] is an equal opportunity provider." The CACFP agency is responsible for providing the full nondiscrimination statement to newspaper, media, or whoever is printing or broadcasting the ad. However, whoever prints or broadcasts the ad is not required to provide the full statement.
- Websites: must be displayed on the home page, but does not need to be on every page of the website.

Civil Rights Requirements

Any organization that accepts federal financial assistance, such as CACFP reimbursement, must comply with all federal civil rights laws, regulations, policies, instructions, and guidance. The following are some of the civil rights requirements for agencies participating in the CACFP:

- Appoint a civil rights coordinator.
- Issue a media release. Only new agencies need to issue a media release. CDE issues a media release once a year, for all other agencies, which satisfies this requirement.
- Make program information available in different languages.
- Include the full USDA nondiscrimination statement on CACFP materials, and anything else that goes out to the public, with the exception of flyers and brochures. The short version of the USDA nondiscrimination statement may be

used on flyers and brochures. For example, the full USDA nondiscrimination statement should be on applications that go out to families. It is not required on items such as pens, pencils, buttons, cups, or magnets that identify the program because the configuration is impractical.

- Display the "And Justice for All" poster in a prominent place so that it can be seen by recipients of the program anywhere that food is served and in all administrative offices where the public has access. Contact Nancy Charpentier at <u>ncharpentier@cde.ca.gov</u> to obtain more posters if needed.
- Collect racial and ethnic data:
 - You must develop a method for data collection on the racial and ethnic breakdown of participants and potential participants. Once you have the data, you will be required to enter it into the CNIPS every year. Selfidentification of the participant's ethnicity and race is voluntary and is the preferred method of obtaining ethnic and racial data. If the participant's ethnicity and race are not provided, you are required to use visual identification or personal knowledge to obtain the data. The participant should be informed that a visual identification will be made and recorded only to determine compliance with federal civil rights laws and will not affect eligibility.
 - You will maintain this data on file for three years plus the current year.

You must have a system in place to handle complaints of discrimination or program complaints. The nondiscrimination statement and a procedure for filing a complaint should be made readily available to the parents or participants of the program, as well as to people who may potentially participate. Staff should be able to identify a civil rights complaint if received and understand how to address the complaint.

The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act of 1973 prohibits discrimination based on disability. This includes accommodating children with special dietary needs.

Agencies should keep in mind the following:

- You must have a system in place for the identification and evaluation of areas for accessibility of disabled persons.
- You must implement policies and procedures to ensure access for participants with disabilities.

• You must provide appropriate aids and services for persons with disabilities and do not have policies that limit participation.

In addition, a child or adult with a disability must be provided food substitutions when that need is supported by a statement signed by a recognized medical authority (licensed physician, physician assistant, or nurse practitioner).

National Origin—Limited English Language Proficiency

Agencies must take reasonable steps to assure meaningful access to CACFP information and services for people with Limited English Proficiency (LEP). The term, LEP, refers to an individual with a limited ability to read, speak, write, or understand English. State and local agencies participating in the child nutrition programs are required by Title VI to provide language assistance to participants and potential participants. Local agencies can use bilingual staff or interpretive services to meet this requirement. The level of contact with LEP participants will determine the need for these services.

According to FNS Instruction 113-1, when determining the need for and extent of LEP communications, State agencies, Local Educational Agencies (LEA), and schools should consider the:

- Overall number of participants from households made up of LEP individuals
- Proportion of students from households made up of LEP individuals as compared with the overall student population
- Frequency of communications with LEP individuals
- Means through which communications are sent (mail, telephone, websites, etc.)
- Resources already available (such as USDA translation materials) and the resources that will need to be supplied (such as oral interpreters)

Note: Refer to pages 9-12 of FNS Instruction 113-1 for more information on LEP.

Recognizing a Civil Rights Complaint

A complaint pertaining to unequal treatment based on race, color, national origin, sex, age, disability or retaliation for prior civil rights activity is considered a civil rights complaint. The complaint can be either verbal, written, or visually observed. This means someone might complain by a phone call, letter, email, fax, or any form of communication.

Agencies participating in the CACFP are required to have written procedures to address any discrimination or program related complaint that they receive. This includes assigning a civil rights coordinator who will be the point of contact when complaints are received.

Once you have assigned a person as the civil rights coordinator, that person is responsible for the following:

- Creating a complaint log
- Processing incoming complaints
- Tracking the complaint through the investigation and resolution process
- Assisting the complainant with filing the complaint
- Forwarding all civil rights complaints (race, color, national origin, sex, age, disability) to the USDA National Office of Adjudication

The civil rights coordinator is responsible for providing information on how to file a complaint with the USDA and noting the complaint on her complaint log. She is also responsible for notifying the USDA national office of all complaints of discrimination.

The civil rights complaint log must contain all relevant information to investigate and resolve the complaint including the:

- details of the complaint;
- contact information of the complainant (unless anonymous); and
- name and location of the site where the alleged discrimination occurred.

These records must be kept for three years plus the current year, even if no complaints have been received, and must be available upon request by the CDE or USDA.

Administrative Review

During an AR, the CDE will verify that:

 Program and civil rights information is available to applicants, participants, grassroots organizations, or similar minority groups at each site. (A grass roots organization is any organization at the local level that interacts directly with eligible or potentially eligible participants or beneficiaries, such as an advocacy organization, community action program, civic organization, migrant group, religious organization, neighborhood council, or other similar group.)

- Complaint procedures are in place to address complaints and incorporate federal requirements.
- The USDA "And Justice for All" poster is displayed.
- The nondiscrimination statement is included on all program materials produced for public information, public education, or public distribution.
- Materials regarding the program are provided in the appropriate language of the population being served.
- All civil rights complaints are addressed properly.
- Reasonable accommodations are provided in the delivery of services to participants with disabilities.

If your agency is found to be out of compliance with any civil rights requirements during an AR or as the result of a complaint, your agency must take immediate steps to correct the noncompliance and provide documentation that the noncompliance is permanently corrected.

Customer Service

Customer service is an important part of the complaint process. Most people just want to tell their side of the story. A listening ear can make the difference between calming the person down or making the situation worse. Keep in mind the following tips when addressing a complaint:

- Treat all applicants and beneficiaries equally.
- Understand the complainant's rights.
- Know the responsibilities of addressing a complaint.
- Identify and eliminate barriers that prevent people from receiving benefits.
- Show respect and dignity to all.

Conflict Resolution

Conflict resolution goes hand in hand with good customer service. By providing good customer service, you might avoid potential complaints.

Keep these helpful tips in mind:

- Avoid the desire to blame.
- Attempt to improve the situation.

- Allow complainants to communicate their feelings.
- Improve relationships and increase communication.
- Avoid repeating the situation.

Civil Rights Questions

If you have any questions regarding civil rights or program-related complaints, please contact:

Heather Sashington CDE Civil Rights and Complaints Coordinator Email: <u>hsashington@cde.ca.gov</u> Phone: 916-322-2145

Documentation Requirements for the CACFP Meal Patterns

Self-study Test

- 1. The Meal Pattern Documentation Checklist is a useful tool for preparing for an Administrative Review.
 - A. True
 - B. False
- 2. Program operators serving infants and children have the option of limiting participation in the CACFP to only the children enrolled for care.
 - A. True
 - B. False
- 3. Program operators must notify parents/guardians that an iron-fortified formula is offered at no charge by:
 - A. Including a notification in the parent handbook
 - B. Including a notification on the enrollment record
 - C. Including a notification on the agency's website
 - D. Including a notification on another available document
 - E. Obtaining the signature of a parent/guardian who provides an alternate formula acknowledging they are declining the program operator's infant formula
 - F. Any of the above methods
 - G. A, C or D only
 - H. A or E only
- 4. Daily meal records for infants must document the amount of formula, breastmilk, or foods actually consumed by infants.
 - A. True
 - B. False
- 5. Breastmilk can be stored in a refrigerator for up to 72 hours after expressed.
 - A. True
 - B. False

- 6. When infants are transitioning to solid foods they must be offered all meal components on the meal pattern.
 - A. True
 - B. False
- 7. For children and adults participating in the CACFP, program operators must
 - A. Maintain daily menus demonstrating compliance with meal pattern requirements
 - B. List food items served on the menus to document that meals and snacks include the required meal pattern components
 - C. Both A and B
- 8. Licensed child care centers are required to post menus in a public location one week in advance.
 - A. True
 - B. False
- 9. It is now required that the fat content of milk served, and whether it is unflavored or flavored, must be specified on the menu or menu production record.
 - A. True
 - B. False
- 10. For programs that use offer versus serve (only allowed in at-risk afterschool or adult day care), all types of milk offered must be listed on the menu.
 - A. True
 - B. False
- 11. Whole grain-rich (WGR) items can be identified on the menu or menu production record by:
 - A. Writing WGR after the food item
 - B. Highlighting or bolding the WGR item
 - C. Using an asterisk (*) by the WGR item(s) with a footnote on the bottom of the menu indicating it is WGR
 - D. Any of the above methods

- 12. Program operators must clearly indicate any menu substitutions on the menu, menu production record, or transport records.
 - A. True
 - B. False
- 13. Grain-based desserts are not credible in the CACFP so they cannot ever be served as an extra food.
 - A. True
 - B. False
- 14. The current version of the federal Nondiscrimination Statement must be included on menus if they are available to the public and contain other information regarding the CACFP.
 - A. True
 - B. False
- 15. With the exception of at-risk afterschool care centers and emergency shelters, menu production records must be maintained for children ages 12 months and older and for adults in adult day care to verify that the quantity of food prepared meets the minimum serving size in the meal patterns.
 - A. True
 - B. False
- 16. Creditable infant foods include:
 - A. Any infant formula containing at least one milligram of iron per 100 calories and sold in the U.S.
 - B. Infant cereal made from dry, iron-fortified infant cereal
 - C. Ready-to-eat cereals, served at snack time only, fortified or made from enriched or whole grain meal or flour and containing no more than 6 grams of sugar per dry ounce
 - D. All of the above
- 17. To be creditable, CACFP regulations state that flavored milk must not be served to participants three years of age and younger.
 - A. True
 - B. False

- 18. If a written request of a nondairy milk substitute is incorporated into an existing or new document, such as an enrollment record, the form, *Request for a Fluid Milk Substitute* (CNIPS Form ID CACFP 49), is no longer required.
 - A. True
 - B. False
- 19. On the day of the on-site meal observation, the label for all grains served that day must be available.
 - A. True
 - B. False
- 20. A breakfast cereal must have less than 6 grams of sugar per dry ounce and appear on the CA State Women, Infants and Children Supplemental Nutrition Program Shopping Guide in order to be creditable.
 - A. True
 - B. False
- 21. Tofu is now allowable for children and adults if it:
 - A. Is commercially prepared
 - B. Easily recognizable as a meat substitute
 - C. Contains at least 5 grams of protein per 2.2 ounce
 - D. All of the above
 - E. A and B only
- 22.Creditable Meat/Meat Alternates must be listed in the USDA Food Buying Guide or the most current Crediting Handbook for the CACFP.
 - A. True
 - B. False
- 23. For participants without disabilities who are substituting one component of a meal or snack, a specific form is no longer required.
 - A. True
 - B. False

- 24. Program operators must accommodate special dietary needs that do not constitute a disability.
 - A. True
 - B. False
- 25.Program operators must make reasonable substitutions for participants with a disability but are **not** required to provide exact product brands listed in the medical statement.
 - A. True
 - B. False
- 26. A parent/guardian signature is **not** required when participants decline the CACFP.
 - A. True
 - B. False
- 27. Condiments, herbs, and spices may be purchased with program funds and can credit towards the meal pattern requirements.
 - A. True
 - B. False
- 28. All of the following must be retained for the current Federal Fiscal Year, October 1 through September 30, plus the prior three Federal Fiscal Years:
 - Menus
 - Food and beverage receipts and invoices, if applicable
 - Menu Production Records, if required
 - CN labels, Product Formulation Statements, and standardized recipes, if applicable
 - Transport records, if applicable
 - Medical statements, if applicable
 - A written request from a parent/guardian of an infant or child or a household member of an adult participant for a nondairy milk substitute when there is no disability, if applicable
 - A. True
 - B. False

- 29. The short nondiscrimination statement can be used on flyers, posters, or documents that are one page by nature.
 - A. True
 - B. False
- 30. Civil rights complaints must be verbal or written.
 - A. True
 - B. False
- 31. Program operators are required to develop a method for data collection on the racial/ethnic breakdown of participants and potential participants. This information is entered into CNIPS each year.
 - A. True
 - B. False
- 32. Complaint logs must be kept three years plus the current year, and available upon request by the CDE or USDA.
 - A. True
 - B. False

2019 Mandatory Training Course Evaluation

Documentation Requirements for the Child and Adult Care Food Program Meal Patterns

- 1. This course helped me understand the documentation requirements for the Child and Adult Care Food Program meal patterns.
 - Strongly agree
 - o Agree
 - Neither agree nor disagree
 - o Disagree
 - Strongly disagree
 - Not applicable
- 2. The course adequately covered the topic.
 - Strongly agree
 - o Agree
 - Neither agree nor disagree
 - Disagree
 - Strongly disagree
 - Not applicable
- 3. I would recommend this course to others.
 - Strongly agree
 - o Agree
 - Neither agree nor disagree
 - o Disagree
 - Strongly disagree
 - Not applicable
- 4. What is the main reason you took this course?
 - Required by my employer and/or job training
 - Required by my agency's Child Nutrition Consultant
 - o Wanted to increase my knowledge of procurement requirements in the CACFP
 - Other _____

5. What did you learn from this course that will help you better comply with the documentation requirements for the Child and Adult Care Food Program meal patterns?

6. Please provide any additional comments or suggestions you would like to share with us.