

WISCONSIN DEPARTMENT OF PUBLIC INSTRUCTION
Community Nutrition Programs
Child and Adult Care Food Program

Guidance Memorandum 6A: For Child and Adult Care Food Program Sponsoring Organizations and Independent Centers (Adult Care Component)

Topic: Enrollment Requirements

Date: July 2014

All centers participating in the Child and Adult Care Food Program (CACFP) must have an enrollment policy that defines which enrolled adults will be reported within the enrollment data on the monthly CACFP reimbursement claim.

A. Eligible Adults

The reported monthly enrollment data must only include enrolled adults who meet the following two eligibility criteria, as defined in USDA regulations.

1. Persons who are functionally impaired and/or 60 years of age or older

Eligible adults must be functionally impaired and/or 60 years of age or older.

- *Functionally impaired adult* means chronically impaired disabled persons 18 years of age or older, including victims of Alzheimer's disease and related disorders with neurological and organic brain dysfunction, who are physically or mentally impaired to the extent that their capacity for independence and their ability to carry out activities of daily living is markedly limited. Activities of daily living include, but are not limited to, adaptive activities such as cleaning, shopping, cooking, taking public transportation, maintaining a residence, caring appropriately for one's grooming or hygiene, using telephones and directories, or using a post office. Marked limitations refer to the severity of impairment, and not the number of limited activities, and occur when the degree of limitation is such as to seriously interfere with the ability to function independently.

2. Private Residency

Eligible adults must either reside in their own homes (whether alone or with spouses, children, or guardians) or in group living arrangements.

- *Group living arrangement* means residential communities which may or may not be subsidized by federal, state or local funds but which are private residences housing an individual or a group of individuals who are primarily responsible for their own care and who maintain a presence in the community but who may receive on-site monitoring.

B. Ineligible Adults

USDA regulation specifies that "institutionalized" adults are not eligible for CACFP participation because they are no longer primarily responsible for their own care. "Institutionalized" adults are those who reside in the following living arrangements:

1. Nursing Homes

2. Community Based Living Facilities (CBRFs)

3. Licensed or Certified Adult Family Homes (AFHs) (which include foster homes)

Per the definition of licensed and certified AFHs in the Wisconsin Administrative Codes 82 and 88 and Wisconsin State Statute 50, residents of AFHs have relinquished the responsibility for their own care to the service provider and/or the designated service coordinator who is responsible for the resident's care through Individualized Service Plans (ISP), the provision of meals, and the provision of care on a 24 hour basis;

Ineligible adults must not be included within your agency's CACFP monthly enrollment data as well as meals claimed for reimbursement.

C. CACFP Enrollment Policy

All eligible adults enrolled at the center must be enrolled in the CACFP and therefore be included on its Household Size-Income Record (HSIR) (see *Guidance Memorandum 1A*) and reported within the center's monthly enrollment data regardless of the following:

- whether they are served or claimed for meals and snacks;
- what their eligibility categories are (Non-needy, Reduced, or Free), based on their Household Size-Income Statements (HSIS) (See *Guidance Memorandum 1A*);
- whether they have complete and current HSIS.

1. Individual Plans of Care or Individual service plans (ISPs):

All adults must be enrolled into the adult day care center according to the Adult Day Care Certification Standards per the Department of Health Services; this includes having individual plans of care for each functionally impaired adult.

Individual plans of care or Individual service plans (ISPs) coordinate a variety of health, social, and related support services which include the goals and objectives of the planned care, the activities that will be completed to achieve the goals and objectives, recommendations for therapy, referrals to and follow-up with other service providers as needed, provisions for periodic review and renewal, and a daily schedule of individual and group activities aimed at providing both physical and mental stimulation.

2. CACFP Enrollment Time Frame

Agencies must define the time frame that their enrolled eligible adults are considered enrolled in the CACFP. The chosen time frame must be uniformly applied to all enrolled eligible adults when completing the HSIR each month. Agencies may select one of the three enrollment time frames (a-c) listed below or specify another time frame for their CACFP enrollment policy.

At minimum, all enrolled eligible adults who have been in attendance at least one time within the given calendar month must be included within that month's completed HSIR; a center may choose only this time frame, which is on a "One (1) Month Basis", choice "a". Your agency may expand this time frame to include additional enrolled eligible adults who are not in attendance for the given month when choosing options "b" or "c".

a. One (1) Month Basis

Eligible adults are counted as enrolled on the HSIR for a given month if they are in attendance at least one day of that calendar month. Attendance records for that calendar month must be the basis for determining which eligible adults are enrolled for the month.

b. Three (3) Month Basis

Eligible adults are counted as enrolled when completing the HSIR for a given month if they have attended at least once in the past 3 months. After an attendance lapse of 3 months, the eligible adults are no longer counted as enrolled on the HSIR for subsequent months.

c. Vacant Opening Basis

Eligible adults are counted as enrolled when completing the HSIR for a given month if the center maintains a vacant opening in anticipation of their future attendance at the center.

The DPI generally advises agencies to choose "a", the "One (1) Month Basis" time frame, because it is most easily supported by attendance documentation and it most accurately represents the enrolled eligible adults served meals in that given month calendar month.

- **CACFP Contract**
Agencies must indicate what each site's enrollment policy is within its online CACFP contract.

On the *Site Application* page of the online CACFP Contract

Enrollment:

Check *only one* of the *enrollment policy* your institution follows in relation to participants who will be reported as free, reduced and non-needy each month on the reimbursement claim. In accordance with USDA guidance, a center is required to maintain its definition of enrollment for the entire fiscal year or receive written permission from DPI to change the enrollment definition if it is not consistent throughout the year. For Institution/Sponsoring Organization with two or more sites and/or a sponsoring organization that sponsors one or more sites which is/are not the same legal entity(ies) of the sponsoring organization, detail the enrollment policy and the applicable center(s) if the policy varies between each center. Refer to Guidance Memorandum 6, Enrollment, for additional information and examples of reasonable and measurable enrollment criteria. ("At Risk" After School and Emergency Shelter sites: Please specify how attendance at these sites is documented, in lieu of an enrollment policy.)

A participant is considered enrolled for a given month if he/she has a completed and approved current enrollment form on file, and:

is in attendance at least one day in the given month; !

has attended at least once in the past three months; !

the center maintains a vacant opening in anticipation of the participant(s) future attendance at the center, or !

Other Specify below: !

A site is required to consistently maintain its enrollment policy for the entire Federal Fiscal Year (October – September), as agreed to within its online CACFP contract. If an agency would like to change a site's enrollment policy during the fiscal year, the agency must request for permission and receive approval from DPI through the online CACFP contract amendment process, prior to making the change.