Policy Alert

Date: January 30, 2006
Reference: # CACFP DCH 2006-5
To: Child and Adult Care Food Program-Day Care Homes (CACFP-DCH) Sponsors
Subject: Household Contact Procedures
Effective Date: Immediately

Purpose
The household contact procedure is an oversight tool that sponsoring organizations must implement and use as a means to provide a more independent way of checking the accuracy of a provider’s meal counts. By getting information from parents about their child's attendance at a facility, household contacts enable monitors to confirm children’s attendance and enrollment.

Implementation
Immediately

Definitions

Household Contact: a contact made by a sponsoring organization or a State agency to an adult member of a household with a child in a day care home or a child care center in order to verify the attendance and enrollment of the child and the specific meal service(s) which the child routinely receives while in care.

Secondary Verification: a means of verifying information, either when the first or primary means of verifying the information has failed or was inconclusive, the first means of verification is not applicable, or the situation requires two or more means of verification.

Procedure

When unusual CACFP participation/claiming patterns are detected at a monitoring visit or during the consolidation of meal count data, follow-up will be conducted using the household contact procedure to verify that meals claimed in the time period in question were:

- served to children enrolled in care; and
- served to children in attendance when the meal was served.

This Policy Remains in Effect Until Further Notice
Procedure

At a minimum, you must call parents or guardians of children whose attendance/enrollment is in question when one or more of the following situations occurs:

- There is an unexplainable difference in the number of meals claimed than what the monitor verifies at the monitoring visit/review.
- There is no acceptable explanation for a significant variation (10% or more) in the attendance on the day of the monitoring visit/review.
- Maximum capacity is claimed consistently except on the day of the review.
- There is a suspicious claiming pattern discovered during review of the monthly meal count data submitted.
- Children are only absent the day of the monitoring visit/review.
- Complaints are received that indicate meals are claimed fraudulently.
- Enrollment form and/or attendance form appears to be completed or altered without parental consent.
- Any other claiming pattern and/or program participation concerns that the sponsoring organization identifies.

Contacting Households

- Do not notify the provider prior to initiating household contacts.
- Households may be contacted by written correspondence, email, phone, personal visit or any other means the sponsoring organization may choose to make. Letters are strongly encouraged as families may be hesitant to share this type of information with a stranger over the phone. When using letters, include a self-addressed stamped envelope to increase chances the household will respond.

A minimum of three documented attempts must be made to contact the household.
- If all attempts to contact a household fail, verify that the contact information is the most current by using the secondary verification process. Secondary verification of participation is acceptable only when the sponsoring organization can document compliance with the requirement to make a minimum of three attempts to contact the child’s parent or guardian.

Examples of secondary verification are:
  - Itemized deposit slips or receipts showing the child-care payments were received for the child during the time period in question;
  - Collateral contact such as a member of the child’s family other than the parent, guardian, or the parent or family member of another child in care who can verify that the child was enrolled for care and received meals during the time in question;
  - Sign in/sign out sheets that show that the child was present during the meal service during the time in question; or
  - Trip sheets and/or field trip permission forms that show the child was present during the meal service time in question.
- Initiate the action within 30 calendar days from the date of the monitoring visit/review or the date the claim in question is processed. No more than 45 calendar days may elapse from the start of the household contact procedure to the end.
A response rate of 50% or more of the households contacted is considered successful. If contact cannot be made with at least 50% of the selected households, meaning the household contact procedure is unsuccessful, you may use other approaches (additional unannounced reviews, more detailed review(s) of claim history, etc.) to investigate and explain the Program concern. Regardless of other approaches used, you must document all subsequent actions taken to an unsuccessful household contact.

**Contact Documentation**

Document household contacts and attempts; include the following data:

- Name of Provider
- Name of person conducting the household contact;
- Name of child/children in household in question;
- Name of household contact;
- Circumstances that initiated the household contact;
- Date of household contact or attempted household contact;
- Method of household contact;
- Circumstances for unsuccessful household contact;
- Information obtained from household contact; and
- Any additional information the sponsoring organization wants to include.

A sample household contact form is attached, but you may develop your own form.

The sponsoring organization must establish their own written policies and procedures regarding corrective action and reimbursement when discrepancies are verified.

**Adverse Action**

Failure to implement the household contacts procedure could result in adverse action.

**Authority**

Child and Adult Care Food Program: Improving Management and Program Integrity Rules.

**Contact**

If you have any questions regarding this Policy Alert please contact your Area Program Office.

ATTACHMENT