Date: March 26, 2014
To: Child and Adult Care Food Program (CACFP) Home Sponsors
From: Suzanne Secor Parker, Consultant, Bureau of Nutrition and Health Services
RE: Provider Registrations
Effective: Immediately

Concerns have been expressed about expired registrations and CACFP participation during the last several months. Several providers have been required to repay CACFP reimbursement because a current registration was not received due to gaps, revocation, and registration renewals not submitted. The purpose of this memo is to provide information, guidelines and expectations regarding provider registrations.

**CACFP Regulations (7CFR 226.18 Day care home provisions.)**
“(a) Day care homes shall have current Federal, State or local licensing or approval to provide day care services to children. ….. Day care homes which are complying with applicable procedures to renew licensing or approval may participate in the Program during the renewal process, unless the State agency has information which indicates that renewal will be denied. ….”

**CACFP State Agency (SA) Responsibility**
The SA will contact Department of Human Services (DHS) to request the status of a provider’s renewal process if their registration has been expired for more than one month and a new registration has not been received. A decision based on findings will be made which may include but not be limited to adding a CNP2000 provider application with a note in the comment box indicating the registration has expired.

**Home Sponsor Responsibilities**
1. Sponsors should encourage providers to contact DHS – Child Care Registration Unit or the local CCR&R consultant when there are registration or renewal questions.

2. The status of provider registrations must be monitored by Home Sponsors which includes:
a. reviewing each registration when received to make sure it currently reflects provider’s information. Inform the provider if there are errors regarding provider’s name, address, category, and effective date versus previous expiration date.

b. maintaining a copy of provider’s registration and a copy of the renewal application on file. A copy of the renewal application must be submitted to the SA when a CNP2000 provider application is submitted to update any information and the registration has expired. For example, a provider’s registration expired 01/01/2014, the provider requested to add suppers effective 02/01/2014. A copy of the renewal application must be sent to the SA and the renewal pending box checked on the provider application. As a reminder, an application should not be submitted in order to only check the renewal pending box.

c. maintaining documentation (emails, phone calls, etc) from providers about changes in their registrations.

d. submitting readable registration copies to the SA when received.

e. updating CNP2000 provider applications to match registrations.

f. submitting copies of DHS correspondence regarding changes in providers’ capacity, etc., to the SA.

3. Meals served over capacity must not be reimbursed. There are two exceptions when the number of meals served may be claimed over DHS capacity:

a. An eligible provider may claim meals served to their own school age children or over age 13 when there is a documented physical or mental disability, when the same meals are served to non-residential children. Provider eligibility documentation must be on file.

b. The same meal served to “shifts” of children are allowed to be claimed if attendance records reflecting time in/time out show that registration capacity was not exceeded at any time.

4. If overcapacity is observed during an on-site monitoring review, the Sponsor must notify DHS in writing. Documentation of the observation and contact with DHS must be maintained.

5. Sponsors are encouraged to use the DHS website to view current status of provider registrations:

   https://ccmis.dhs.state.ia.us/ClientPortal/ProviderSearch.aspx

6. Registrations with a provider’s child care business name or in addition to his/her name are accepted. Sponsors must write the provider’s name on the registration before submitting it to the SA if only the child care business name is identified.

**Provider Responsibilities**

In-home child care is a provider’s profession including all responsibilities associated with monitoring their registration.
1. Providers are to inform their Home Sponsor when there will be a change in his/her registration: name, address, category/capacity, or revocation.

2. Providers must comply with DHS registration rules, particularly capacity and providing a safe child care environment. The capacity for ages of children at any one time must be followed as well as when an assistant/co-provider is required. Documentation (in and out times) of part-time child care hours for “B” and “C” registrations must be maintained. The form (Daily Attendance Record for “Part-Time” Hours) in the DHS manual may be used, or the provider may identify children when using part-time hours on CACFP attendance records and track total part-hours used during the month.

3. Each provider should renew their registration in a timely manner, before the current registration expires. Providers should make sure all required documents are submitted with the renewal application. Copies of all documents sent to DHS as part of renewal packet should be maintained by the provider.

4. A readable copy of the renewal application should be submitted to the Home Sponsor when it is sent to DHS.

5. Providers should review their new registration to make sure it correctly reflects current information: name, address, and category. The effective date should be compared to the previous expiration date to determine if there is a gap. Providers are responsible for contacting DHS if there are errors on the new registration.

6. Providers must submit a readable copy of the new registration to their Home Sponsor as soon as it is received.

7. Providers should contact DHS – Child Care Registration Unit or the local CCR&R consultant when they have questions about registration rules or renewal process.

8. If a provider is found to be out of compliance with DHS registration rules and DHS is seeking to revoke their registration, the provider is required to post the revocation notice in a place that is visible to the public, and immediately notify the Home Sponsor. In many circumstances, the provider may be able to operate their child care business until a final action is taken by DHS.

9. If a different registration capacity is permitted by DHS, the provider must submit a copy of the DHS letter to the Home Sponsor as soon as it is received.

Home Sponsors are required to share/discuss this information with all providers.

Iowa Department of Human Services Registration
1. Registration packets are mailed to child development home providers from the Des Moines office approximately 90 days before the provider’s registration expiration date.
2. Effective July 1, 2013, providers were required to submit fingerprints as part of the registration renewal process. Providers need to allow 6-8 weeks to process fingerprints.

3. DHS staff members conduct on-site visits to homes as part of registration renewal process. Findings are discussed with the provider. DHS is required to go to 100% of the registered child development homes annually. DHS is currently completing approximately 67% of all required home visits.

4. Registration renewals received are considered in process when all documents are received. If additional documents are required, a provider has ten (10) days to respond OR an extension must be requested before his/her registration is revoked.

5. According to the Iowa DHS Registration Manual, Comm. 143, October 2009:
   a. Part-time hours refers to “the hours that child development homes in categories B and C are allowed to exceed their maximum preschool and/or school age capacity. A provider may use a total of up to 180 hours per month as part-time hours. No more than two children using part-time hours may be in the child development home at any one time” (page 2).
   b. It is necessary to use part-time hours only if the number of children in care exceeds the allowable capacity. A provider may have up to two additional preschool or school-age children in care who are using part-time hours. The provider can NEVER exceed the maximum number of children under 24 months of age in care. Providers must show proof of the number of part-time hours used during the month (maximum of 180 hours) (page 29).

6. If a provider changes to a new registration category, the allowable number of children according to the new category becomes effective as of the effective date on the new registration.

Email (suzanne.secorparker@iowa.gov) or call (515-281-3744) if you have questions.