

Montana Department of Public Health & Human Services	Policy
	SH CACFP 1998-5 Rev 2
	Section: Sponsors of Day Care Homes
Child and Adult Care Food Program	Subject: Recruitment
	Date Revised: 1/30/2009

RECRUITMENT

All SO are encouraged to recruit DCH providers that are not currently participating in the CACFP. Listings of active DCH providers are available upon request from the State agency. During the pre-approval process, the State agency will utilize the list of active providers to inform a SO if they are currently participating with another SO.

Sponsoring organizations (SO) shall not actively recruit day care home (DCH) providers who are participating in the Child and Adult Care Food Program (CACFP) under a current CACFP *Sponsor/Provider Agreement* with any other SO.

1. Public advertisements are not considered direct contacts or active recruitment.
2. Publications or publicity produced by a SO may be distributed to CACFP participants they do not sponsor, and will not be considered active recruitment if;
 - a. the information applies to all SO participating in the CACFP; and
 - b. the information is applicable to the CACFP as a whole.
3. Publications or publicity produced by a SO detailing the sponsoring organization's core business activities, which may include but are not limited to CACFP, are acceptable as long as the agency is only including CACFP as part of their business not focusing on CACFP activities solely.
4. Trainings, events, or activities sponsored by a SO are not considered direct active recruitment unless the specific intention of the event is CACFP focused. For example, a SO speaks at a meeting or conference where there are child care providers in attendance. During this time, the SO provides an overview of its core services and mentions the CACFP as part of the core business. This would be considered acceptable.
5. If a SO is asked to conduct a workshop for a local group of providers, it is appropriate for the SO representative to describe their job title, job duties, and the role of their agency to justify their knowledge and expertise. It is equally appropriate that contact information given and included in the workshop. NOTE: It becomes active recruitment when the details of the CACFP are specific to the SO's organization and enrollment or recruitment forms and documents are used or distributed, and persuasion is used. Additionally, it is active recruitment when the SO's contact information is excessive, for example, on every document and promotional material used.
6. It is acceptable for a SO to use websites or social media as a means to describe the services that the organization provides, including the CACFP. A link to the State agency's website for the CACFP can also be used: www.bestbeginnings.mt.gov.

Active Recruitment:

Definition: Direct contact initiated by a SO with a DCH provider who is currently participating in the CACFP, for the purpose of enticing the provider to switch to a different SO.

1. Direct mailings, in-person contacts, phone calls, faxing or e-mailing are considered direct contact.
2. Publications produced by a SO for the sole purpose of CACFP, that are sent to DCH providers that it does not sponsor are considered direct contact and active recruitment if the communication or mailing is invitational in content. For example, a Child Care Association uses a licensed/registered provider list and sends out a notice to DCHs inviting them to join the agency's CACFP food program.
3. Trainings, events, or activities sponsored by an organization that specifically invite providers to join the agency's food program. For example, a child care resource and referral agency holds new provider orientation as part of their core business. During this training, the agency hands out a brochure specific to the agency's food program only and do not mention that there are other CACFP sponsoring organizations available. NOTE: It is not active recruitment, however, if the agency includes a brochure detailing their agency's services and CACFP is mentioned as one of the services of the agency.

Disciplinary Action:

Suspected recruiting violations must be reported to the State agency staff in writing for investigation and the State agency will issue a determination to the SO who has been identified as possibly violating the active recruitment policy. Correspondence may not occur with the party issuing the complaint once a determination has occurred.

Should active recruitment be determined, the following will occur:

1. First occurrence: A warning letter will be issued to the SO stating the policy violation.
2. Second occurrence: The State agency will not allow the SO to add any new or switching DCH providers for 6 months.
3. For subsequent violations, the SO will not be allowed to enroll any new providers or providers changing sponsors without specific prior written approval from the State agency for five (5) years. The State agency may allow or deny SO requests for pre-approval for any reason it chooses.
4. Simultaneous active recruitment of multiple providers will be treated as a single violation.

[References: 7 CFR 226.6 (p) page 44 and 226.6(b)(1)(iv)(E)(xvii)(A)(1) page 15 and 226.6(b)(2)(vii)(A)(1) page 18]