

# **EARLY HEAD START TIP SHEET**

**No. 8 – 2009 revision**

## **Provisions of Diapers & Formula**

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### **Are Early Head Start programs responsible for providing diapers and formula in center-based programs?**

#### **Response:**

Early Head Start programs are responsible for providing diapers and formula as part of the comprehensive services that Early Head Start provides. Early Head Start programs are responsible for supplying the necessary, age-appropriate materials that meet the needs and facilitate the participation of the children and families. Programs should use information from families and medical personnel, as soon as possible, to best respond to each child's individual needs. For example, allergies and lactose intolerance should be taken into consideration when purchasing and supplying formula. Latex allergies should also be considered when purchasing gloves needed for diapering. Cloth diapers, as well, may be required when a child can not wear plastic/disposable diapers for medical reasons.

As cited below in 1305.9, once a child and family is determined to be eligible for Head Start, a program may not solicit, encourage, or in any other way condition a child's enrollment or participation in the program upon the payment of a fee. Costs incurred by families when purchasing diapers and formula could be considered a fee.

*Is supplying diapers for families the same as providing clothing?*

No, diapers are necessary materials for sanitary and hygienic toileting practices, as are rubber gloves, wipes, toilet paper, and disinfectant.

*Is supplying formula to families who receive supplemental formula from WIC a double-dipping practice?*

Although many families receive supplemental foods for their infants and toddlers for at-home consumption through Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), it is not considered a double dipping practice for EHS programs to provide foods. WIC and EHS support the nutritional needs of the child at home and in the EHS program. A family receiving benefits from both programs is receiving a supplemental food and nutrition education benefit from the WIC program and also receiving as a benefit, the meal service and nutrition education from EHS. As the infants' growth needs increase (for example, infants needing more formula than newborns), the USDA meal requirements used by the EHS program complements both the home feeding and the infants' developmental readiness.

USDA will reimburse for formula fed to young infants receiving both formula and breast milk when programs provide the amounts of formula stated on each infant's meal plan. USDA also reimburses other formulas needed as part of a special diet for toddlers when programs provide medical evidence and documentation of need.

#### **Questions to Consider for Planning and Programming:**

- Does the program's budget include the cost of diapers and formula?
- How does the program look for opportunities to garner these items through other funding opportunities or in-kind donations?

- How does the program ensure individualized services when purchasing these items?

### **Performance Standards, Title 45, Code of Federal Regulations:**

- 1304.23(b)(1)(iv) Each infant and toddler in center-based settings must receive food appropriate to his or her nutritional needs, developmental readiness and feeding skills, as recommended in the USDA meal pattern or nutrient standard menu planning requirements.
- 1304.23(b)(1)(i) All Early Head Start and Head Start grantee and delegate agencies must use funds from USDA Food and Nutritional Services Child Nutrition Programs as the primary source of payment for meal services.
- 1304.53(b)(1)(iii) Grantee and delegate agencies must provide and arrange sufficient equipment, toys, materials, and furniture to meet the needs and facilitate the participation of children and adults. Equipment, toys, materials, and furniture owned and operated by the grantee or delegate agency must be age-appropriate, safe, and supportive of the abilities and developmental level of each child server, with adaptations, if necessary, for children with disabilities.
- 1305.9 A Head Start program must not prescribe any fee schedule or otherwise provide for the charging of any fees for participation in the program. If the family of a child determined to be eligible for participation by a Head Start program volunteers to pay for part or all of the costs of the child's participation, the Head Start program may accept the voluntary payments and record the payments as program income. Under no circumstances shall a Head Start program solicit, encourage, or in any other way condition a child's enrollment or participation in the program upon the payment of a fee.
- 1304.20(f)(1) Grantee and delegate agencies must use the information from the screenings for developmental, sensory, and behavioral concerns, the ongoing observations, medical and dental evaluations and treatments, and insights from the child's parents to help staff and parents determine how the program can best respond to each child's individual characteristics, strengths, and needs.

### **Resources:**

**Do programs need to provide formula during socializations?** Early Head Start Tip Sheet 3. DHHS/ACF/OHS. 2003. <http://www.ehsnrc.org/Publications/> (accessed October 8, 2009).

**Issues Related to Feeding Infants in the Child and Adult Care Food Programs (CACEFP).** USDA/CACEFP. 2000. <http://www.fns.usda.gov/cnd/care/Regs-Policy/InfantMeals/2000-04-20.htm> (accessed October, 8 2009)

**Provision of Diapers.** Program Instruction ACF-PI-HS-09-03. DHHS/ACF/OHS. 2009. <http://eclkc.ohs.acf.hhs.gov/hslc/Program%20Design%20and%20Management/Head%20Start%20Requirements/PIs>

**Women, Infants, and Children (WIC).** US Department of Agriculture (USDA)/ Food and Nutritional Service (FNS). <http://www.fns.usda.gov/wic/>

10/09 (9/02)

*This Tip Sheet is not a regulatory document. Its intent is to provide a basis for dialogue, clarification, and problem solving among Office of Head Start, Regional Offices, TA consultants, and grantees. If you need further clarification on Head Start Policies and regulations, please contact your Regional Program Specialist.*