The Compliance Review Process

CACFP Update Training
2018-2019

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CACFP Staff
Office of Child Nutrition
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An unscheduled, on-site visit conducted by a Child and Adult Care Food Program (CACFP) Program Monitor to assess Program operations, use of Program funds, and to ensure CACFP requirements are being met. The review period will be the most recent month for which a claim for reimbursement has been filed by your organization. However, the State Agency may review any month during the entire program year.
What areas will the Program Monitors evaluate?

- Enrollment Forms
- Meal Applications
- Master Roster
- Menu Book
- Monthly Claim Data
- Application and Agreement
- Meal Service Observation
- Meal Counts
- Record of Use of Program Funds
- Procurement Plan
- Civil Rights Information
- Current License (if applicable)
What happens after the Review?

The Program Monitor will prepare a **Compliance Review Report** detailing the areas covered during the review. A **Findings** Letter containing the specific deficiencies will be sent by certified mail to the person responsible for effective operation of the Program. Findings are areas of noncompliance with Federal regulations, FNS Instructions, and CACFP policy memoranda. They require immediate attention and must be adequately addressed by the organization.
Examples of Serious Concerns:

Any of these areas of noncompliance will result in the DISALLOWANCE of meals!

- Claiming meals for children who are not present
- Claiming meals for children who are not enrolled
- Lack of food or milk receipts
- Menus not being up-to-date
- Serving meals that do not meet meal pattern requirements*
- Serving insufficient portions of food or milk
- Claiming more meals than children in attendance
- Documenting meal components not actually served
- Not documenting meal service counts timely
The Most Common Mistakes involve **Recordkeeping!**

- Enrollment Forms
- Meal Applications
- Master Roster
- Daily Attendance Records
Enrollment Forms

Organizations are required to maintain documentation of the enrollment of each participant. They must be updated annually. All enrollment forms must include the following:

- Each Child’s Name and Birth Date
- Days Child will be in Attendance
- Hours of Care Needed
- Meal Types received while in Care
Meal Applications

The State Agency is required to verify the eligibility for free and reduced-price meals by reviewing Meal Applications. The application must be fully completed by the household, including income information, number of household members, and SNAP, TANF, SSI, or Medicaid numbers.
A Master Roster is used to track current participants, new enrollments, and eligibility categories. During a Compliance Review, the Program Monitor will verify the names and eligibility status of all enrolled participants, entrance dates, and withdrawal dates.
Daily Attendance Records

Organizations are required to maintain accurate daily attendance records of all enrollees. Attendance Records must be tallied monthly. These records must be maintained separately from the institution’s meal count records.
Whole Grain Component

The Program Monitors are tasked with the responsibility of verifying whether participants in CACFP are adhering to the Whole Grain component of the updated meal pattern requirements. In order to determine or establish compliance, the Program Monitors will:
Whole Grain Component

• Review the menus and menu books of participating centers and day care homes to ensure that a whole grain item is served once per day.

• Verify whether participating centers and day care homes are noting whether an item served is whole grain in the menu book.
Whole Grain Component

- Check receipts and invoices for the purchase of whole grain items for the review month.
- Examine the food labels for meal pattern compliance, specifically cereals, yogurt, and all grains (bread, pasta, rice, etc.).
Upon receiving a Findings letter from the State Agency, each organization must provide a written Corrective Action Plan (CAP). The CAP must address each finding and include the actions being implemented to permanently correct the identified deficiency.
How to Develop a CAP

✓ **How** can the problem be prevented or eliminated?

✓ **When** will the problem be corrected?

✓ **Who** will be responsible for making corrections and updating policies?
When a corrective action plan is received from an organization, it is evaluated to ensure that it is complete and that each finding has been adequately addressed. If the CAP is satisfactory, the State agency will issue a letter to the institution indicating that its response was acceptable, and the review is closed.
If the Corrective Action Plan is *NOT* Accepted

- If the corrective action plan is incomplete, the organization will be informed of all outstanding items and allowed additional time to submit the remaining documentation.

- If the corrective action plan is not submitted and/or the additional documentation is inadequate, the State agency must proceed to declare the organization *seriously deficient*. 
The Serious Deficiency (SD) Process

1. Identify the Serious Deficiency
2. Prepare the Serious Deficiency Notice
3. Assess the Corrective Action
4. Prepare the Notice of Intent to Terminate and Disqualify
5. Hold the Appeal Hearing
6. Terminate the Agreement and place the Organization on the National Disqualified List (NDL)
CACFP Staff

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Child and Adult Care Food Program (CACFP)

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This institution is an equal opportunity provider.