

**Community Nutrition Programs**

**Child and Adult Care Food Program (CACFP)**

[Guidance Memorandums](#) [CACFP Webcast Trainings](#)

- Monitoring, Training, and Claims
  - Document Web Links: documents are accessible under Guidance Memo 5A

**Applies To: All Sponsoring Organizations (≥Two Sites)**

- Adult Day Care Centers

**Revision Date: December 2015**

A sponsoring organization is generally defined as an agency that has full administrative responsibility for two or more sites or facilities participating on the CACFP. There are two different types of sponsoring organizations:

- Unaffiliated: A sponsoring organization which sponsors one or more sites which is/are not the same legal entity of the sponsoring organization.
- Affiliated: A sponsoring organization which sponsors two or more sites which are the same legal entity of the sponsoring organization. A site is considered to be the same legal entity as the sponsoring organization if either of the following two conditions are met:
  - The site operates its business under the sponsoring organization's Federal Employer Identification Number (FEIN);
  - The same board of directors or corporate officials who govern the sponsoring organization also directly govern and oversee the site.

CACFP regulations [7 CFR Part 226.16(d)] require that: "Each sponsoring organization must provide adequate supervisory and operational personnel for the effective management and monitoring of the program at all facilities it sponsors."

**I. Monitoring Requirements**

[Webcast: CACFP Monitoring Requirements](#)

Each sponsor must specify what its annual pre-operational visit and review schedule is for each site as part of its management plan, within the sponsor's CACFP contract. The sponsor's review schedule for each site must comply with the requirements specified within this section of the guidance memorandum.

Your agency may use the *Site Review Tracking Form* to assist in tracking the annual monitoring activity for each site to assure that it is completed as required and as specified in your agency's annual management plan.

[Site Review Tracking Form](#)

**A. Pre-operational Visits**

Completed pre-operational visits must be documented on the attached *CACFP Site Pre-operational Visit Form* unless an alternate form has been pre-approved by DPI. When your agency's monitoring staff complete pre-operational visits, it is permitted that participants or staff are not present at the site(s) during these visits since they must be completed prior to the start of CACFP operation; in this case, it is acceptable that only the monitor sign the completed form.

[CACFP Site Pre-operational Visit Form](#)

## Guidance Memorandum 5A: ■ CACFP Sponsoring Organization Requirements

### 1. New Sites and Sites that Move to New Locations

Your agency's monitoring staff must complete a pre-operational visit at sites that are new to your organization's CACFP sponsorship and at sites that move to new locations. The pre-operational visits must be completed prior to approving the site to begin CACFP operation for ensuring that the facility is properly equipped to operate the CACFP and to train staff on CACFP meal requirement and reporting responsibilities.

- These sites must receive the first of their three required reviews per year **within the first four weeks of CACFP operation.**

### 2. Sites That Close for More Than One Month

Your agency's monitoring staff must complete pre-operational visits at sites that close for more than one month prior to beginning CACFP operation for assessing whether the facilities are still properly equipped to operate the CACFP. Training of new staff and reviewing CACFP requirements with continuing staff should also be completed at this time.

## B. Reviews

Completed reviews must be documented on the attached *CACFP Site Review Form* unless an alternate form has been submitted and pre-approved by DPI.

### [CACFP Site Review Form](#)

### 1. Frequency and Type of Reviews

A minimum of three (3) reviews must be conducted each year at each site, except when facilities do not operate year-round and if your sponsoring organization chooses to average its required reviews, as specified in section B7, *Averaging of Required Reviews*. The review year is considered to be the Federal Fiscal Year, October 1 through September 30.

If a facility does not operate year-round, the number of reviews can be prorated as indicated below. If a site operates one day in a given month, it is an operating month.

Months of Operation	Number of Reviews
1-4	1
5-8	2
9-12	3

### 2. Unannounced Reviews and Required Meal Observations

An unannounced review is defined as a review with **no prior notification.**

- At least two of the three reviews must be unannounced.
- At least one of the unannounced reviews must include the observation of a meal service with participants present. In order to count as a "meal observation" review, the monitor must observe the entire meal service time. All rooms where meals are served should be visited at some point during the meal service time.
  - The monitor must assess the facility's compliance with the requirements specified in *Guidance Memorandum 12A: CACFP Meal Pattern Requirements* and the meal counting requirements, as specified in *Guidance Memorandum 9A: CACFP Recordkeeping Requirements*.
- The timing of the unannounced reviews must vary so they are unpredictable to the sites.

## Guidance Memorandum 5A: CACFP Sponsoring Organization Requirements

### 3. No more than six months may elapse between reviews.

### 4. Required review elements

All reviews must include the specified elements listed in 4a-4d as follows:

#### a. An assessment of the site's compliance with following program requirements:

- i) The meal pattern;
- ii) Licensing or approval (including sanitation and safety requirements);
- iii) Staff attendance at training;
- iv) Meal counts; and
- v) Menus and production records

#### b. Findings of Noncompliance

Written documentation of noncompliance found on reviews must include:

- i. A plan for corrective action
- ii. A deadline for completion.
- iii. The date and method of follow-up completed to verify that corrective action was implemented.

#### c. An assessment of whether the site has corrected noncompliance recorded on previous review documentation, if applicable.

#### d. 5-Day Reconciliation

A 5-day reconciliation must be completed by comparing the site's aggregate (or total) daily meal counts for each meal type to both the total enrollment and the total number of participants in attendance for a five consecutive day period. The meal counts and the number of participants in attendance must be recorded within the appropriate section of the *CACFP Site Review Form* for the review date and five consecutive day period.

- The monitor must examine the meal counts recorded by the site for the most recent five consecutive days during the current and/or prior claiming period. *If the monitor determines that an earlier five consecutive day period is indicative of meal count inaccuracies, he/she may examine and document this earlier five-day period for the reconciliation rather than the most recent five-day period.*

**The monitor must follow the steps (i-iv) in the specified order below when completing the 5-day reconciliation:**

- i. Before conducting the actual reconciliation, the monitor must take two preliminary steps:
  - Evaluate the site's enrollment and attendance records to ensure that they are current and accurate.
  - Compare the site's total meal counts to its licensed capacity. Meal counts for any day or any shift (if shift care is provided) should never exceed licensed capacity.

## Guidance Memorandum 5A: ■ CACFP Sponsoring Organization Requirements

- ii. Then, start by comparing the site's total enrollment to its recorded daily attendance, to ensure that the number of participants in attendance does not exceed the number of participants enrolled. If attendance does exceed enrollment, for any day or for any shift (if shift care is provided), the monitor must determine the source of the error (e.g., inaccurate attendance records, missing enrollment forms) before the five-day reconciliation can be completed.
- iii. Next, compare the site's total attendance to its meal counts. The monitor must review the aggregate meal counts for each approved meal type, to ensure that meal counts do not exceed the number of participants in attendance on any day (or for any shift if shift care is provided).
- iv. If meal counts and attendance cannot be reconciled, CACFP regulations require the monitor to "determine whether the establishment of an overclaim is necessary." Meal count and /or attendance record errors must be corrected by the facility and the discrepancy must be recorded as a finding of noncompliance.

### 5. Serious Deficiencies

If any serious deficiencies are identified during a review, the next review of that site must be unannounced. Serious deficiencies include:

- a. Submission of false information on an application
- b. Submission of false claims for reimbursement
- c. Simultaneous participation under more than one sponsoring organization
- d. Non-compliance with the CACFP meal pattern
- e. Failure to keep required records
- f. Conduct or conditions that pose an imminent threat to the health or safety of a participant(s) in care, or the public health or safety
- g. A determination that the center has been convicted of any activity that occurred during the past seven years that lacked business integrity
- h. Failure to participate in training
- i. Any other circumstance related to non-performance under the CACFP agreement

### 6. Imminent threat to the health or safety

- a. **Sponsors must train their monitors to recognize conditions that pose an imminent threat to the health and safety** of the participants, staff, and/or the public and to respond to these conditions appropriately.

Circumstances that rise to the level of imminent threat include:

- Lost or missing participant
- Suspected maltreatment of a participant
- Suspected sexual, physical, or emotional abuse of staff, volunteers, or family members occurring while on the premises of the adult care facility

## Guidance Memorandum 5A: ■ CACFP Sponsoring Organization Requirements

- Injuries to a participant requiring medical or dental care
- Illness or injuries requiring hospitalization or emergency treatment
- Mental health emergencies
- Health and safety emergencies involving the participants' families and visitors at the adult care facility
- Death of a participant or staff member (including a death that occurred outside of care hours that had resulted from serious illness or injury at the adult care facility)
- The presence of a threatening individual who attempts or succeeds in gaining entrance to the facility
- The presence of accessible firearms
- Inadequate or incompetent supervision;
- Unsanitary conditions for food service or unsanitary water;
- Inadequate light, ventilation, sanitation, or heating;
- Failure of the home's fire detection and prevention system.

### b. Required Response by the Sponsor:

- i. The sponsor must notify the relevant regulator and/or health or law enforcement authorities whenever a monitor observes an imminent threat to the health or safety of participants, staff or to the public in the center. If a monitor determines that a participant is in imminent danger, the proper authorities must be contacted immediately and (s)he must stay at the site until the authorities have arrived. The sponsor representative must take action that is consistent with the recommendations and requirements of those authorities.
- ii. This notification must be documented and retained on file.
- iii. When an imminent threat to health and safety is observed at a site, the sponsor must follow the required procedure of suspending the center from the CACFP and declaring the center as seriously deficient. Please contact your assigned consultant for these suspension and serious deficiency procedures.

### 7. Averaging of Required Reviews

If a sponsoring organization conducts one unannounced review of a site and finds no serious deficiencies, the sponsoring organization may choose not to conduct a third review of the site during that year, provided that the sponsoring organization conducts an average of three reviews of all of its sites that year, and that it conducts an average of two unannounced reviews of all its sites that year. This will allow sponsors to focus their review efforts on sites that are more likely to commit errors, by conducting more reviews (at least 2 of which are unannounced) at these sites.

When the sponsor uses review averaging and a specific site receives two reviews in one review year, the one unannounced review must observe an approved meal service and its first review in the next review year must occur no more than nine months after the previous review.

## Guidance Memorandum 5A: ■ CACFP Sponsoring Organization Requirements

### 8. Written Notification to Sponsored Sites

Sponsoring organizations must provide each sponsored site with written notification of the right of the sponsoring organization, DPI, the USDA, and other State and Federal officials to make announced or unannounced reviews of Program activities during a site's normal hours of operation. This notification also must inform sponsored sites that anyone making such reviews must show photo identification showing that they are employees of one of these entities. DPI recommends that the written notification include a description of the unannounced review requirements, as stated in section B2 above.

- This policy on notification of unannounced reviews applies to all sites, even if the sponsored site(s) is the same legal entity as the sponsoring organization.
- The sponsoring organization must provide the unannounced reviews notification requirement to new sites prior to commencement of meal service under the CACFP.

### C. Follow-up Methods

When a site review or a site's submitted claim information raises concern about potential non-compliance, the sponsor must follow up to investigate and resolve the concern. The methods for following up may vary depending on the nature of the concern.

→ Reasonable follow-up methods may be completing unannounced reviews and/or a more detailed examination of the site's claim information submitted for previous months

### D. Monitoring Staff (Sponsoring Organizations of 25 or More Sites Only)

As part of a sponsoring organization's annual management plan, it must document that it will employ the equivalent of one full-time monitoring staff person for each 25 to 150 sites it sponsors. The monitoring staff equivalent may include the employee's time spent on scheduling, travel and review time, follow-up activity, and report writing.

The Department of Public Instruction (DPI) has developed criteria for determining whether a sponsoring organization has sufficient monitoring staff. Refer to the *Monitoring Staffing Requirements – Sponsoring Organizations with 25 or More Facilities (PI-6070-A)* form or contact your assigned consultant for additional information.

## II. Training Requirements

### [Webcast: Training Staff on CACFP Topics](#)

Sponsoring organizations must provide training on CACFP requirements to "key staff" from all sponsored sites.

#### A. Timing and Frequency of Training

##### 1. New staff and staff at new sites:

New staff and staff at new sites must be formally trained prior to being held responsible for compliance with CACFP requirements and prior the beginning of program operations.

##### 2. Current Staff:

Current staff must be formally trained on an annual basis, at least once each Federal Fiscal Year (October 1 – September 30).

## Guidance Memorandum 5A: ■ CACFP Sponsoring Organization Requirements

### B. Definition of “Key Staff”

“Key staff” is defined as any staff member with primary responsibility for the operation of the CACFP and/or maintenance of the records that support the monthly claim for reimbursement and compliance with any other CACFP requirement. This includes staff members who have monitoring responsibilities.

### C. Required Training Topics

CACFP training must include instruction appropriate to the level of staff experience and responsibilities in the following areas:

1. **CACFP Meal Patterns**
2. **Meal Counts**
3. **Claims Submission**
4. **Review Procedures**
5. **Recordkeeping Requirements**
6. **Reimbursement System**
7. **Civil Rights Requirements**

All staff that interacts with program applicants or participants and their families as well as supervising staff must complete the required CACFP civil rights training on an annual basis. Please refer to *Guidance Memorandum 8A: Civil Rights Requirements for the CACFP* for the specific subject matter that must be covered within the annual civil rights training.

### D. Training Documentation

#### 1. CACFP training documentation must show the following:

- a. Training session date(s) and location(s)
- b. Topics presented at each session, **including copies of materials reviewed within the training session**
- c. Names of staff (including the name of site he/she is from) attending each session

#### 2. DPI Resources

- a. **The CACFP Training Checklist:** use this checklist as a tool for assuring all key staff receives initial and annual training on the required CACFP topics; for referencing the DPI resources available to meet the CACFP training requirements; and for documenting what topics are reviewed and which resources are used to complete the required training. The checklist also provides guidance on which key staff should be trained on each required topic.

[CACFP Training Checklist for Sponsoring Organizations \(GM 5A\)](#)

- b. **The CACFP Training Agenda form** (found under *Guidance Memorandum 9C*): use this form with the *CACFP Training Checklist* to document when training is completed and staff attendance.

[CACFP Training Agenda Form](#)

## Guidance Memorandum 5A: CACFP Sponsoring Organization Requirements

### III. Completing the Household Size-Income Record (HSIR) (refer to *Guidance Memorandum 1A: CACFP Requirements for Household Size-Income Statements*, Section I, for further detail)

**A separate HSIR must be completed for each site to track its enrolled participants each month.**

- **When participants attend more than one center within a given month**, they must be enrolled at each site and included on each of the attended sites' HSIRs. This is critical because claims may be rejected where attendance exceeds enrollment.

A printed copy of the HSIR for each site must be retained on file with each month's claim along with the other information that supports data on the claim.

### IV. Meal Count Edit Checks

#### [Webcast: Meal Count Edit Checks](#)

When submitting a reimbursement claim, each agency certifies that the claim is correct and that records are available to support that claim. CACFP regulations require the sponsor to perform and document two meal count edit checks for each site's meal counts prior to submitting its consolidated monthly claim.

- Required Meal Count Edit Check One:** the sponsor must verify that the site has been approved to serve the types of meals claimed.
- Required Meal Count Edit Check Two:** the sponsor must verify that the total number of meals claimed by each site does not exceed the number derived by multiplying:  
[The number of approved meal types **times** the number of days of service **times** the total monthly enrollment number]

[Meal Count Edit Check Sample Form](#) (listed under *Guidance Memo 3A: Claims Submission and Processing* on Guidance Memo website)

#### → **Meal Counts Versus Capacity Number:**

Sites must not claim more meals for any meal service type than its licensed or authorized capacity; if serving meals in shifts, the site's capacity cannot be exceeded at any one given time within the number of meals claimed.

Sponsors must monitor their sites' submitted meal counts to assure that the number of meals claimed do not exceed their capacity.

#### **Recordkeeping Retention:**

All required documentation, as specified within this guidance memorandum, must be retained on file in accordance with the CACFP record retention rule, which is for at least three Federal Fiscal Years (FFY) years plus the current FFY; except that, if audit findings have not been resolved, the records must be retained as long as required for resolution of the issues raised by the audit.