Child and Adult Care Food Program (CACFP) Administrative Review Requirements

Administrative Review

- Code of Federal Regulations (CFR) Requirements
- CACFP Administrative Review
  - How to Prepare for an Administrative Review?
  - What Are the Consequences of an Administrative Review?
  - How to Correct Findings?
  - What Are the Consequences for Uncorrected Findings of the Administrative Review?

CFR 7 Part 226
Review Requirements

- Must review 33.3 percent of all institutions annually
  - At least 15 percent of the total number of facility reviews must be unannounced
- Must review new sponsoring organization with five or more facilities within the first 90 days of operation

CFR 7 Part 226
Review Requirements

- Must review independent centers and sponsoring organizations of 1 to 100 facilities once every three years
  - Must review 10 percent of the sponsoring organization's facilities
- Must review sponsoring organization with more than 100 facilities every two years
  - Must review 5 percent of the first 1,000 sponsoring organization's facilities and 2.5 percent of the facilities in excess of 1000

CFR 7 Part 226
Program Irregularities

- Must investigate complaints regarding the operation of the Program
- Must maintain evidence of such investigation

CACFP Administrative Review

- Review new sponsoring organization with five (5) or more facilities within the first 90 days of operation
- Review new independent centers after 12 months on the program
- Review
  - May be announced or **unannounced**
  - Performed during normal hours of operation
- Reviewer will present a photo ID

CACFP Administrative Review

- Review current operation of the Sponsor, Site(s), and Food Service Management Company (FMSC)
  - Review last reimbursed claim month
    - Review all required records
  - Observe and analyze a meal

How to Prepare for an Administrative Review?

- Adhere to federal and state regulations and guidelines
- Implement checks and balances for each process
- Contact program staff for guidance when problems occur

How to Prepare for an Administrative Review?

- Maintenance of Required Documents
  - Maintain all required records
  - Maintain documentation of income and expenses
- Civil Rights Compliance
  - Collect racial and ethnic data of participants
  - Establish a Civil Rights complaint policy
  - Post the "…And Justice for All" poster in a prominent place

How to Prepare for an Administrative Review?

- Attendance Record (AR)
  - Prepare AR as of October 1 and each subsequent month
  - Keep AR up-to-date daily
  - Add participants as they enter center
  - Maintain enrollment forms
  - Report enrollment accurately

How to Prepare for an Administrative Review?

- Application/Income Eligibility Forms (IEFs)
  - Approve applications/IEFs correctly
  - Code categories (F, R and P) correctly on AR
- Free, Reduced, and Paid Participants
  - Calculate and claim participants correctly based on applications and AR
  - Enter data into claim correctly

How to Prepare for an Administrative Review?

- Sign-in/Sign-out
  - Claim meals for participants that were present and served
- Licensing
  - Do not exceed license capacity for meal counts/participants

How to Prepare for an Administrative Review?

- Meal Counts
  - Count meals served correctly
  - Take point of service meal counts and record immediately
- Meal Count Records
  - Consolidate meal counts correctly
  - Complete attendance forms
  - Enter data into site data correctly

How to Prepare for an Administrative Review?

- Production Records
  - Complete production records daily
  - Serve all required components
  - Maintain CN label, if needed
  - Provide water during each meal service
- Procurement
  - Document procurement method
  - Document small purchase method

How to Prepare for an Administrative Review?

- Reported Costs of Program
  - Calculate costs correctly
  - Claim only allowable costs in the correct category
  - Budget bank account and internet fees and other expenses
  - Keep budget up-to-date
  - Maintain a file to document all costs (receipts, invoices, allocations, cancelled checks, donation forms, etc.)

How to Prepare for an Administrative Review?

- Fiscal Integrity
  - Do not intermingle funds
  - Do not incur insufficient charges
  - Do not make cash withdrawals
  - Document all expenditures and revenues
  - Keep bank balance below three months operating costs
  - Reconcile monthly budget, general journal and bank statement

How to Prepare for an Administrative Review?

- Training
  - Train staff on required topics
    - Civil Rights
- Proprietary 25% Free and Reduced
  - Meet 25% free and reduced requirement

How to Prepare for an Administrative Review?

- Milk Analysis
  - Purchase enough milk
  - Purchase correct milk
- Serving Days
  - Report serving days correctly

How to Prepare for an Administrative Review?

- Monitoring
  - Perform monitoring, if required
  - Complete monitoring forms
    - Ensure appropriate corrective action is taken
    - Follow SD procedures
    - Conduct parental contact when needed

What Are the Consequences of an Administrative Review?

- Findings
  - Serious Deficiencies
    - Submission of false or fraudulent information
    - Health and safety sanitation issue
    - Failure to operate Program in compliance with regulations
    - Material deviation
    - Failure to respond to review

How to Correct Findings?

- Adhere to timeframes
- Refund disallowances
- Permanently implement the corrective action

How to Correct Findings?

- Submit a corrective action plan that specifically states:
  - What procedures will be implemented to permanently correct the finding(s)
  - Who will be responsible for completing the task
  - When will the procedures for permanently correcting the finding be implemented, including a timeline for implementing the procedures (i.e., will the procedures be done daily, weekly, monthly, or annually and when will they begin)
  - Where the corrective action plan will be retained
  - How the staff and facilities will be informed of the new policies and procedures (e.g., Handbook, training, website, etc.)

What Are the Consequences for Uncorrected Findings of the Administrative Review?

- Appeal Procedures
- Withhold Program Payment
- Termination
- National Disqualified List

Administrative Review

- Code of Federal Regulations (CFR) Requirements
- CACFP Administrative Review
  - How to Prepare for an Administrative Review?
  - What Are the Consequences of an Administrative Review?
  - How to Correct Findings?
  - What Are the Consequences for Uncorrected Findings of the Administrative Review?

Questions