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?

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 independent centers and sponsoring organizations of 1 to 100 facilities once every three years
  - Must review 10 percent of the sponsoring organization's facilities

CFR 7 Part 226-Review Requirements

- 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
- Must review new sponsoring organization with five or more facilities within the first 90 days of operation

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 sponsors after 12 months on the program
  - May be announced or unannounced
  - Performed during normal hours of operation
  - Present photo ID
- Monitor current operation of the Sponsor, Site(s), and Food Service Management Company (FSMC)
  - 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 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 each month and keep up-to-date daily
  - Add participants as they enroll in the center
  - Enter participants' exit date when they stop attending
- Application (Outside School Hours)
  - Approve applications correctly
  - Code categories (F, R and P) correctly on AR

How to Prepare for an Administrative Review?

- Participants
  - Calculate and claim participants correctly based on applications and/or AR
  - Enter data into claim correctly
- Meal Counts
  - Count participants served correctly
  - Compare to participants on attendance records correctly
  - Consolidate meal counts correctly
    - Enter data into site data correctly

How to Prepare for an Administrative Review?

▫ Meal Count Records
- Take accurate (point of service) meal counts and record immediately
- Complete attendance records

▫ Sign-in/Sign-out, if required
- Claim meals for participants that were present and served

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, etc.)

How to Prepare for an Administrative Review?

- ▫ Menu Records
  - Serve all required components
  - Maintain CN label, if needed
- ▫ Procurement
  - Document procurement method
  - Document small purchase method

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
  - BOEs   5199 Revenue Code
                              9341 Function Code
- 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
- Licensing, if required
  - Do not exceed license capacity for meal counts/participants

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

How to Prepare for an Administrative Review?

- Milk Analysis
  - Purchase enough milk
  - Purchase correct milk
- Serving Days
  - Report serving days correctly
- Proprietary 25% Free and Reduced (OSHCC)
  - Meet 25% free and reduced requirement

What Are the Consequences of an Administrative Review?

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

What Are the Consequences of an Administrative Review?

- Withhold program payment
- Appeal Procedures
- Termination
- National Disqualified List

How to Correct Findings?

- Adhere to timeframes
- 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*** the procedures for permanently correcting the finding were 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.)
- Permanently implement the corrective action

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Questions