



CORRECTIVE ACTION PLANS

RCCI/Private Schools Training
ALSDE - CNP
October 7, 2020

2020 Fall
RCCI/Private Schools Training
presented by
Alabama State Department of Education



AGENDA

**Wednesday
October 7, 2020**

**VIRTUAL
TRAINING**

Montgomery, AL



**Welcome ~ Announcements
Updates and Reminders** **Robbie Scott**
Education Specialist
ALSDE, School Programs

COVID19 Waivers **Julie Autrey**
Education Specialist
ALSDE, School Programs

CNP Finance Management **Steven Rylant**
Auditor
ALSDE, Financial Management

HACCP **LaKecia Love**
Education Specialist
ALSDE, School Programs

**Special Diets and Food
Allergies** **Devin Williamson**
Nutritionist
ALSDE, School Programs

Corrective Action Procedures **Chad Langston**
Senior Nutritionist
ALSDE, School Programs

Agenda

Click on the link below to access the recorded training:

<https://alsde.webex.com/alsde/lsr.php?RCID=7cc5865a7010483eb9cca5d70c762864>

Timeline

Once every 3-5 years, School Food Authorities (SFA) receive an Administrative Review (AR)



PRELIMINARY AR REPORT –
DISCUSSED DURING EXIT
CONFERENCE



FINAL AR REPORT - MAILED
TO SFA WITHIN 30 DAYS OF
EXIT CONFERENCE



CORRECTIVE ACTION
PLAN – COMPLETED BY
SFA AND SUBMITTED TO
SA (STATE AGENCY)
WITHIN 30 DAYS OF
RECEIPT OF FINAL REPORT



SA RESPONSE – REVIEW
AND RESPOND TO CAP
SUBMISSION WITHIN 30 DAYS
OF RECEIPT FROM SFA

Corrective Action

7 CFR 210.18(j)

- Corrective action is required for any violation under either the critical or general areas of the review. Corrective action must be applied to all schools in the school food authority, as appropriate, to ensure that deficient practices and procedures are revised system-wide.

Types of Citations

Critical

- Performance Standard 1 – all free, reduced price and paid school meals claimed for reimbursement are served only to children eligible for free, reduced price and paid school meals respectively; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.
- Performance Standard 2 – reimbursable lunches meet the meal requirements in 7 CFR 210.10 as applicable to age/grade group reviewed. Reimbursable breakfasts meet the meal requirements in 7 CFR 220.8, as applicable to age/grade group reviewed.

General

- Areas of review specified in paragraph (h) of this section. These areas include free and reduced-price process, civil rights, school food authority on-site monitoring, reporting and recordkeeping, food safety, competitive food services, water, program outreach, resource management, and other areas identified by FNS.

Corrective Action Plan

7 CFR 210.18

- *Documented corrective action* means written notification required of the school food authority to certify that the corrective action required for each violation has been completed and to notify the State Agency of the dates of completion. Documented corrective action may be provided at the time of the review or may be submitted to the State Agency within specified timeframes.
- Corrective actions may include training, technical assistance, recalculation of data to ensure accuracy of any claim that the school food authority is preparing at the time of the review, or other actions.

Response to Corrective Action Plan
A separate form should be completed for each citation.

SFA:	Agreement #:
Citation #:	
Person Accountable for Results of CAP:	
Citation	
State the citation in the box below. Be sure that you understand the finding. Do not be afraid to ask questions. Work with the reviewer to understand the finding and the source of any data used in the finding. State the finding and interpret it in your own words.	
Explain how the SFA was noncompliant in the box below. Identify what the root cause was for the occurrence of the citation. Unless the problem is stated appropriately, finding the root cause and in turn, identifying the solution is not feasible. (Ex. lack of training; no monitoring plan in place; etc.)	
Corrective Action	
Date Corrective Action has been implemented, (Date plan was put into action.):	
In the space below, describe the steps that have been made to correct the finding. Be sure to demonstrate how the noncompliance will be permanently eliminated. Create simple, measurable solutions to address the root cause of the finding. What is the exact issue that is causing the problem? Devise a way to rectify the noncompliance. (Ex. Provided training or retraining; revise policies, procedures, menus etc. to make them compliant and set schedule for monitoring this issue.)	
List the person(s) responsible for overseeing the corrective action and ensuring compliance as well as follow-up and monitoring of the plan:	
In the space below, list any evidence you are providing that verifies the cause(s) of the finding are eliminated. <u>Evidence must show compliance.</u> (Ex. of supporting documents - Copy of written policy, written procedures, training agenda, training materials and sign sheets, current production records, temp logs, etc.)	
<input type="checkbox"/> The SFA certifies that the corrective action for this violation/citation is complete.	
Signature:	Date:
<input type="text"/>	<input type="text"/>

Response to CAP

In order to assist with completing corrective action, complete this form for each citation.

Completing Response to CAP Form

Person Accountable for Results of CAP:

- The first step is to identify who will be responsible for completing the Correction Action Plan for the individual citation.
 - This responsibility will typically be that of the CNP director.

Completing Response to CAP Form

State the citation in the box below. Be sure that you understand the finding. Do not be afraid to ask questions. Work with the reviewer to understand the finding and the source of any data used in the finding. State the finding and interpret it in your own words.

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- The next step is to simply re-state the citation listed in the preliminary or final AR report provided by the auditor.

Completing Response to CAP Form

Explain how the SFA was noncompliant in the box below. Identify what the root cause was for the occurrence of the citation. Unless the problem is stated appropriately, finding the root cause and in turn, identifying the solution is not feasible. (Ex. lack of training; no monitoring plan in place; etc.)

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Step 3 requires stating the root cause of the citation.

Completing Response to CAP Form

Date Corrective Action has been implemented, (Date plan was put into action.):

- Record the date that the SFA corrected the citation.
- The correction must take place prior to the deadline to submit the CAP to the SA.

Completing Response to CAP Form

In the space below, describe the steps that have been made to correct the finding. Be sure to demonstrate how the noncompliance will be permanently eliminated. Create simple, measurable solutions to address the root cause of the finding. What is the exact issue that is causing the problem? Devise a way to rectify the noncompliance. (Ex. Provided training or retraining; revise policies, procedures, menus etc. to make them compliant and set schedule for monitoring this issue.)

- State the actual procedures that are being implemented to assure the root cause is addressed and the citation won't reoccur.
- Be specific and detailed.

Completing Response to CAP Form

List the person(s) responsible for overseeing the corrective action and ensuring compliance as well as follow-up and monitoring of the plan:

- The individuals can vary greatly, and communication is important to ensure that all individuals involved in the correction are clear of their roles and responsibilities.

Completing Response to CAP Form

In the space below, list any evidence you are providing that verifies the cause(s) of the finding are eliminated. Evidence must show compliance. (Ex. of supporting documents - Copy of written policy, written procedures, training agenda, training materials and sign sheets, current production records, temp logs, etc.)

- Supporting documentation for each citation **must** accompany the CAP for the SA to sign off that the AR is complete.

SDE Approval Letter

- Upon receipt of your CAP by the SA, the Response to CAP form along with supporting documentation will be reviewed by Audit and/or School Program staff
- The SFA's corrective action plan must provide enough detail so that the SA can determine whether the findings/issues were **fully** and **permanently** corrected.
- Once the SA makes the determination that the CAP demonstrated full correction of each citation, the SFA will receive a notification letter regarding the approval of the CAP.

**If the CAP isn't received by the 30-day deadline, the SA may withhold reimbursement until the CAP is finalized.*

Example

Offer versus Serve (OVS) Signage

- Federal guidance states that students, servers and cashiers must be able to identify what constitute a reimbursable meal. The NSLP regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what foods constitute unit priced reimbursable meals. Schools using Offer versus Serve (OVS) must also identify what a student must select in order to have a reimbursable meal under OVS. Signage should be posted on the service line to assist students in identifying a reimbursable meal. Signage was not posted on the service line.

EXAMPLE

CORRECTIVE ACTION REQUIRED per preliminary AR Report

- Signage must be posted on the service line to assist students in identifying a reimbursable meal as required by federal regulations.

EXAMPLE

INSUFFICIENT RESPONSE

- *The OVS signs were not posted in the cafetorium.*
- Our food service professionals have had extensive training in OVS. I am confident that each school program is only claiming reimbursable meals, based on their training. The nutritionist monitors each program and reports show no issues with Offer versus Serve. Cashiers in our school district are not required to have OVS training as their focus is entering the correct student number for an accurate meal count. The nutritionist will request signs from the State Office and send them out to the schools when they arrive. We always strive to do our best for the children.

EXAMPLE

SUFFICIENT RESPONSE

- *Step 1 – John Doe – CNP Director*
- *Step 2 - Our school district participates in Offer versus Serve (OVS) and must identify, through the appropriate signage, what a student must select in order to have a reimbursable meal under OVS. Federal regulations 7 CFR 210.10(a)(2) require signage be posted on the serving line to assist students in making choices for a reimbursable meal. That guidance also states servers and cashiers must also be able to identify what constitute a reimbursable meal. This provides additional assurance that only reimbursable meals clear the cashier station.*
- *Step 3 – The underlying issue for receiving the citation was the director wasn't aware of the requirement and directing the focus of the cashier away from reimbursable meals and more towards accurate meal counts.*

EXAMPLE

SUFFICIENT RESPONSE (cont.)

- Step 4 – 00/00/00
- Step 5 - At the conclusion of the exit conference, the CNP Director sent an email of high priority to each CNP manager, supervisor, and nutritionist informing them of the meal review finding and the Federal guidance for Offer versus Serve. The email instructed program managers to print and laminate the attached OVS signage and post them near or at the beginning of the serving lines for compliance with National School Lunch Program OVS requirements and to request additional signage as needed from the administrative assistant. The same email announced a mandatory training on Offer versus Serve for CNP central office staff, managers, cafeteria serving staff, and cashiers that was held on 00/00/0000. Monitoring forms, used by supervisors, were revised 00/00/0000 to list each type of signage observed as opposed to “signage”. The Assistant CNP Director will performed Quality Reviews on supervisors monitoring to ensure future compliance with OVS signage. The QR must be completed 10 days after the monitoring visit.

EXAMPLE

SUFFICIENT RESPONSE (Continued)

- Step 6 – supervisors will utilize monitoring forms and Asst. CNP Director will perform Quality Reviews on supervisors monitoring
- Step 7 - Documents attached:
 - Email and Attachments
 - Revised Monitoring Form
 - Training Agenda
 - Training Attendance Sign-In Sheet
 - Responsibilities and Duties for Assistant Director

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- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Thank you

Contact Information:

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