

Section 8.1: Frequency/Purpose

Pre-approval Visits

During the final stages of the application process, ADE will conduct a pre-approval visit. The purpose of this visit is to ensure the applying organization is eligible to operate the CACFP. Once the hard copy application is complete, the assigned specialist will contact the applying organization to schedule the pre-approval visit.

Welcome Visits

ADE is required to visit all new sponsors within the first 90 days of participation in the CACFP. A CACFP Specialist will review program records and recordkeeping procedures and provide technical assistance as needed. Welcome visits allow the Specialist to identify any potential problems that may arise and provides the opportunity to assist in correcting them. Welcome visits do not apply to sponsors who have five or more sites. A full administrative review will be conducted in lieu of the welcome visit.

Technical Assistance Visits

Each business day from 8am-5pm, a CACFP Specialist is assigned to receive incoming calls from sponsors to provide them with any technical assistance needed. The CACFP Specialist can be reached by dialing 602-542-8700. Ask to speak to the CACFP Specialist of the Day. Specialists are also available to conduct technical assistance visits on-site if a participant has a specific program area that needs further clarification or requires additional training (i.e. production worksheets, infant requirements). On-site technical assistance visits must be requested in writing.

Reviews

Sponsors of the CACFP are subject to administrative reviews conducted by ADE/H&N staff, by duly authorized Program consultants, or by USDA staff. The ADE/H&N is required to conduct a percentage of unannounced reviews. Federal regulations do not require advance notification. If the review is announced, Sponsors are notified two to four weeks prior to the review date.

Administrative reviews are conducted:

- Every three years at a minimum.
- Within the first 90 days during the first year of participation. This applies only to sponsors who have five or more sites. Those with five or more sites do not receive a Welcome Visit, as mentioned above.
- At least once a year until deficiencies are corrected. This applies to sponsors found to be seriously deficient. The scope of review involves records for the current fiscal year and may also involve a review of prior year's records, if necessary.

The following is a list of items that are required for a review:

1. Income affidavits
2. Claiming Percentage Rosters F/R/P
3. Sign-in/out (attendance) Records
(multiple sites/centers must provide for month indicated and 5 days prior to review date)
4. Enrollment Emergency Forms (Blue/Cards)
5. Title XX DES Billing Records*
6. Point of Service Meal Count Sheet
(multiple sites/centers must provide for month indicated and 5 days prior to review date)
7. Meal Count Summary
8. Infant Daily Meal Production Records*
9. Infant Feeding Preference Forms*
10. Menu (with dates for the month being reviewed on it)
11. Medical Statements for Meal/Milk Substitutions for Medical Reasons*
12. Child Nutrition (CN) Labels*
13. Menu Production Worksheets*
14. Procedure for Complaints of Discrimination
15. Civil Rights Pre-Award Compliance Review
16. Civil Rights Compliance Data Collection
17. Internal Civil Rights Training Materials
18. Current License/Sanitation Permit
19. Food Handler Cards
20. Food Safety Manager Card*
21. Monitoring and training documents for multiple site/center sponsors*
22. Time Distribution Reports
23. Food Service Cost Report/CACFP Expense Worksheet (receipts, invoices, leases, etc.)
24. Management Plan
25. CACFP Policies and Procedures (record maintenance/job descriptions/block claiming)
26. Permanent Agreement
27. Procurement Standards Guidelines
28. Administrative Review Procedures
29. Food Service Vender Contract
30. Food Service Vender Invoices

*If applicable

Audits

Audits shall be conducted in accordance with Circulars A-133 and A-110 of the Office of Management and Budget and the Uniform Federal Assistance Regulations (7 CFR part 3015) of the USDA. Audits are conducted by ADE/H&N staff or duly authorized Program consultants. Sponsors are notified prior to the audit date. The ADE/H&N reserves the right to conduct unannounced audits. Federal regulations do not require advance notification.

Administrative audits are conducted based on the total federal assistance expended. Audits encompass the current fiscal year and/or a closed fiscal year. An audit may be conducted during a current fiscal year; however, the scope of an audit may involve records from a prior fiscal year.

Agreed Upon Procedure Engagements

Because audits are based on Program reimbursement, not all sponsors will meet the financial threshold for audit requirements. Such sponsors may undergo an Agreed Upon Procedure Engagement instead. An Agreed Upon Procedures Engagement is similar in scope to an audit and will focus on many of the same areas.

Section 8.2: Program Compliance/Verification

As part of the CACFP review or audit, all records to support any claims filed for reimbursement must be made available within a reasonable amount of time, authorizing ADE/H&N staff and duly authorized consultants access to examine and copy such records and inspect facilities during normal business hours.

Fiscal action may be taken for findings found under the following areas:

- Classification of children under free, reduced or paid categories
- Sign-in/sign-out, enrollment, attendance records
- Title XX assist billing forms (applicable to for-profit sponsors)
- Meal count records and point-of-service meal count system
- Observed meal
- Menus and production worksheets
- Reimbursement claim forms

Corrective action may be required for violations found under the following areas in addition to areas stated above:

- Required recordkeeping
- Civil rights compliance
- Training and monitoring responsibilities
- Current license, health/safety inspections, sanitation permits
- Current Food Service Agreement
- Procurement/purchasing standards
- Tax-exempt status (non-profit status)
- Administrative and operating labor costs and purchased services
- Costs for food and supplies
- Income to the program (adult meals in excess of the 5:1 ratio/donated food)
- Free and reduced price eligibility process

Conditions by which a sponsor will be considered seriously deficient may include, but is not limited to the following:

- Noncompliance with applicable bid procedures and contract requirements
- Submission of false information to the ADE/H&N
- Failure to maintain Program records
- Claiming meals not served to children
- Serving meals that do not contain required components or amounts
- Continued use of food service providers/vendors who are in violation of health codes
- Refusing facility access to ADE/H&N staff or USDA staff
- Permission of an individual on the National Disqualified List
- Failure to operate program in conformance to performance standards
- Failure to follow Federal procurement regulations

- Invalid Title XX claiming
- Failure to properly train or monitor facilities
- Failure to disburse payments to facilities
- Conviction of institution or principals indicating lack of integrity
- Failure to adjust meal orders to conform with the number of participants
- Failure to maintain adequate records
- Claiming for significant number of meals that do not meet program requirements
- Use of FSMC that is in violation of health codes
- Failure to perform financial and administrative duties

Sponsors determined to be seriously deficient who do not satisfactorily implement or maintain corrective action shall be terminated from CACFP. For more information on serious deficiencies, please refer to Chapter 12. Findings affecting participation or claims for reimbursement may be appealed by following the CACFP Appeal Procedure included in the CACFP application packet.