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

Sponsoring Organization (SO) Definition: an agency that has full administrative responsibility for two or more sites/facilities participating on the CACFP. There are two different types of SOs:

Affiliated: A SO with two or more sites that are the same legal entity as the SO. A site is considered the same legal entity as the SO if either of the following conditions are met:

- The site operates under the SO’s Federal Employer Identification Number (FEIN);
- The same board of directors or corporate officials who govern the SO, governs and oversees the site.

Unaffiliated: A SO that sponsors one or more sites which is/are not the same legal entity of the SO.



MONITORING REQUIREMENTS

Monitoring reviews must be conducted at all facilities that participate on the CACFP.

- [CACFP E-Learning Course](#): *Monitoring* lesson reviews SO monitoring requirements.
- Use the *Monitoring Tracking Form* to plan and track monitoring reviews for each site to assure they are completed as required.

[Monitoring Tracking Form](#)

Monitoring Staff

To ensure effective oversight, it is recommended that staff who monitor each site are staff who do not regularly work at the site (ex. administrative staff or the director of one site conducts monitoring at another site).

Written Notification to Sponsored Sites

Sponsoring organizations must provide each site with written notification of the right of the Sponsor, DPI, USDA, and other State and Federal officials to make announced or unannounced reviews during a site’s normal hours of operation. This notification must inform sites that anyone making such reviews must show photo identification that they are employees of one of these entities.

- Notification of reviews applies to all sites, even if the site is the same legal entity.
- Provide review notification to new sites prior to the start of service under the CACFP.

Pre-operational Visits

Monitoring staff must complete a pre-operational visit at the following sites:

- Sites that are new to the CACFP sponsorship
- Sites that move to new locations
- Sites that close for more than one month

The pre-operational visit must be completed prior to a new site beginning its CACFP operation and prior to beginning CACFP operation at the new location. This is to ensure the site is equipped to operate the CACFP and document that site staff with CACFP responsibilities have been trained on Program requirements. Participants or staff are not required to be present during the pre-operational visit since this visit must be completed prior to the start of CACFP operation.

Pre-operational Visit Form

Pre-operational visits must be documented on the *CACFP Site Pre-operational Visit Form* unless an alternate form has been pre-approved by DPI. When completing the pre-operational visit form when no staff are present, it is acceptable that only the monitor sign the completed form.

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

Monitoring Reviews

Frequency and Type of Reviews

A minimum of three (3) monitoring reviews must be conducted at each site each Federal Fiscal Year (October 1 through September 30), except when facilities do not operate year-round or if the SO chooses to average its reviews, as specified below.

If a site 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

- New sites and sites that move to new locations must receive the first of the three reviews **within the first four weeks of CACFP operation.**

Review Requirements

- At least two of the three reviews must be unannounced (**no prior notification**)
- At least one of the unannounced reviews must include a meal observation.
- No more than six months may elapse between reviews.
- The timing of the unannounced reviews must vary so they are unpredictable to the sites (i.e. do not conduct reviews at different sites on the same day. Do not conduct reviews in the same months each year).

Averaging of Required Reviews

A SO may use review averaging to focus review efforts on sites that are more likely to commit errors. This is done by conducting more than three reviews/year at these sites and two reviews/year at sites that have no serious deficiencies (see *Serious Deficiencies* section). A SO can use review averaging when the following conditions are met:

1. The SO conducts one unannounced (UA) review of a site and finds no serious deficiencies (this review must include the observation of an approved meal service). The SO may choose not to conduct a third review of this site and may make the second review announced. Then, this site's first review in the next fiscal year must occur no more than nine months after the previous review.
2. The SO conducts an average of three reviews of all of its sites that year.
3. The SO conducts an average of two UA reviews of all sites that year.

CACFP Monitoring Form

Monitoring reviews must be documented on the *CACFP Monitoring Form* unless an alternate form has been pre-approved by DPI.

- Complete all sections and answer each question to determine if the site has any findings that require corrective action
- Verify that the site has corrected all findings

[CACFP Monitoring Form](#)

Follow-up Methods for Non-Compliance

When a monitoring review or a site's claim raises concern about non-compliance, the SO must follow up to investigate and resolve the issue. The methods for following up may vary depending on the nature of the concern. Follow-up methods may be one or more of the following:

- Additional unannounced reviews
- A more detailed examination of the site's claim information submitted for previous months
- Household contacts

Household Contacts

SOs may contact households to investigate suspicious documentation submitted by sites and verify claim accuracy. Refer to [Household Contact Procedure](#) for more information.

Imminent Threat

Monitors must recognize conditions that pose an imminent threat to the health or safety of the participants, staff, and/or the public and notify the relevant authorities. Refer to the resource *Imminent Threat and Serious Deficiencies* for instructions on identifying imminent threat conditions and taking required action.

Serious Deficiencies

When serious deficiencies are identified during a monitoring review, the sponsor must complete the site's next review as unannounced. Refer to the resource *Imminent Threat and Serious Deficiencies* for a list of serious deficiency findings.

[Imminent Threat & Serious Deficiencies](#)



TRAINING REQUIREMENTS

A SO must train key staff, at all sites, on the CACFP requirements applicable to their responsibilities.

- [CACFP E-Learning Course: Training Staff on CACFP Topics](#) lesson reviews SO training requirements. This lesson is not intended to meet the staff training requirements. Use other applicable lessons within the E-Learning Course to train key staff on the seven required topics listed below.

Definition of “Key Staff”

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

Timing and Frequency of Training

- **New staff and staff at new sites** must be formally trained prior to being held responsible for CACFP requirements and prior to the beginning of program operations.
- **Current staff** must be formally trained on an annual basis, at least once each Federal Fiscal Year (October 1 – September 30).

Required Training Topics

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 who interact with program participants and their families, as well as supervising staff, must complete the **required CACFP civil rights training on an annual basis**. Refer to *GM 8: Civil Rights Requirements* for the subject matter that must be covered annually.

Use the *CACFP Training Checklist* to:

- Assure key staff receives initial and annual training on required CACFP topics (the checklist provides guidance on which key staff should be trained on each topic)
- Utilize DPI resources available to meet CACFP training requirements
- Document topics reviewed and resources used to complete training

[CACFP Training Checklist](#)

Training Documentation

CACFP training records must document the following:

1. Training session date(s) and location(s)
2. Topics presented at each session, **including copies of materials reviewed within the training**
3. Names of staff attending each session (including the name of their site)

Use the [CACFP Training Agenda](#) to document when training is completed and staff attendance.

SPONSORS OF AT-RISK AFTERSCHOOL SITES

Sponsors of At-Risk Afterschool sites must complete all SO requirements detailed in this Guidance Memorandum, including:

- Completing a pre-operational visit prior to a new site beginning its CACFP operation and prior to beginning CACFP operation at the new location. See the *Pre-operational Visits* section, above, for more information and the [CACFP Site Pre-operational Visit Form](#).



- Using the [Monitoring Tracking Form](#) to plan and track monitoring for each site to assure reviews are completed as required.
- Providing training to key staff, at all sites, on the CACFP requirements applicable to their responsibilities. *See the Training Requirements section.*

CACFP At-Risk Site Review Form

- Site reviews must be documented on the *CACFP At-Risk Site Review Form* unless an alternate form has been pre-approved by DPI.
- If problems were noted during these reviews, documentation must show what corrective action was taken and documentation of a follow-up visit should be noted.

[CACFP At-Risk Site Review Form](#)

Sponsors of At-Risk Afterschool Sites that Participate in NSLP and/or SFSP

CACFP regulations permit the following flexibilities for sponsors of At-Risk Afterschool Program sites that participate in the National School Lunch Program (NSLP) and/or Summer Food Service Program (SFSP):

Monitoring Requirements

- **Pre-operational visits:** Sponsors are not required to complete pre-operational visits at sites participating in the NSLP or SFSP prior to the beginning of CACFP operations.
- **Reviews:**
 - School Food Authorities: Refer to [School Food Authority Monitoring Options](#)
 - Non-School Food Authority SFSP Sponsors: The three required CACFP reviews may be completed as follows: two reviews may be completed for CACFP and one review may be completed during the summer for SFSP, prior to the end of the fourth week of SFSP operation to assess compliance with the SFSP requirements. This SFSP review must be unannounced and include a meal service observation.

Training Requirements

Food service staff at At-Risk Afterschool sites who receive meal service training under the NSLP and/or SFSP are not required to attend separate CACFP training on meal services. *Administrative staff must attend annual CACFP training.*

MEAL COUNT EDIT CHECKS

SOs must perform and document two meal count edit checks for each site’s meal counts prior to submitting its monthly claim.

- [CACFP E-Learning Course:](#) *Claim Edit Checks* lesson reviews SO meal count edit checks requirements.

Edit Check #1: verify the site is approved in the DPI contract for the type(s) of meals claimed

Edit Check #2: verify that the total number of meals claimed by each site does not exceed the number derived by multiplying:

$$\text{Number of approved meal types} \times \text{number of days of service} \times \text{total monthly enrollment number}$$

If a site submits a total number of meal counts that exceed the number from the calculation above, the sponsor must review the site’s meal counts and other claim data and make necessary corrections **before** submitting the reimbursement claim.

SOs may use DPI’s *Meal Edit Checks Form* to document the completed edit checks each month. They are located under *GM 3*.

[Meal Count Edit Checks Form](#)