

# Child and Adult Care Food Program (CACFP) Sponsor Monitoring Procedures

## Purpose and Scope

1. The purpose of this document is to describe the responsibilities of sponsoring organizations participating in the Child and Adult Care Food Program (CACFP).
2. Included are requirements for monitoring staff, supervisory and operational personnel, and procedures to be followed when conducting monitoring visits. Follow-up and unannounced visits are also addressed.

## Legal Requirements

Laws and regulations that serve as the basis for this document include:

- [7CFR 226.16](#), [7CFR 226.16\(b\)\(1\)](#) and [7CFR 226.16\(d\)](#)

## Personnel and Program Assistance Requirements

Each sponsoring organization must provide adequate assistance to supervisory and operational personnel for the effective management and monitoring of the CACFP at all facilities it sponsors. At a minimum, Program assistance must include:

1. Pre-approval visits conducted of each site to discuss Program benefits and verify that the proposed food service does not exceed the capability of the site;
2. Training for all sites on Program duties and responsibilities prior to beginning Program operations. Sponsoring organizations are required to train all new staff in CACFP soon after hire and before taking responsibility for their CACFP job responsibilities. At a minimum, such training must include Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, reimbursement system, and civil rights. Attendance by key staff (e.g., any staff with CACFP duties or responsibilities) is mandatory and must be documented;
3. Additional mandatory training sessions for key staff from all sites sponsored must occur annually. At a minimum, such training must include Program's meal patterns, meal counts, claims submission and review procedures, recordkeeping requirements, reimbursement system, and civil rights. Attendance by key staff (e.g., any staff with CACFP duties or responsibilities) is mandatory and must be documented;
4. Reviews of food service operations to assess compliance with meal pattern, recordkeeping, and other Program requirements.

## Monitoring Staff

Each sponsoring organization must employ monitoring staff sufficient to meet the United States Department of Agriculture (USDA) requirements. A sponsoring organization of day care homes

must employ the equivalent of one full-time staff person for each 50 to 150 day care homes it sponsors. A sponsoring organization of centers must employ the equivalent of one full-time staff person for each 25 to 150 centers it sponsors.

### **Sponsoring Organization Written Monitoring Procedures**

Each sponsoring organization must have written monitoring procedures that include at a minimum the number of staff assigned to performing monitoring reviews and the percentage of their time they devote to monitoring, how to conduct pre-approval visits to all new facilities prior to claiming meals for reimbursement and submitting their site application, how to conduct monitoring reviews, how to assign and collect corrective action for areas of non-compliance, when to perform follow-up visits, and how unresolved issues of non-compliance are handled.

### **Site Monitoring Reviews**

Monitors are required to conduct regular visits at all facilities to determine compliance with meal patterns, recordkeeping, and other CACFP requirements. Monitoring reviews must assess whether the facility has corrected problems noted on the previous review(s), a reconciliation of the site's previous meal counts with enrollment and attendance records for a five-day period (preferably the prior last five days), and an assessment of the facility's compliance with CACFP requirements pertaining to:

- The meal pattern;
- Licensing or in the case of license exempt facilities, current health and safety inspections;
- Attendance at training;
- Meal counts;
- Attendance records;
- Meal serving times and type of meal service;
- Menu and menu production records;
- Food safety and sanitation;
- Infant meals and records (if applicable);
- Medical statements for food substitutions;
- Civil rights compliance.

### **Frequency and Type of Required Site Monitoring Reviews**

Sponsoring organizations must review each facility three times each year. In addition:

- New sites must be reviewed within the first four weeks of Program operations;
- At least two of the three reviews must be unannounced;
- At least one unannounced review must include an observation of meal service (all approved meal services must be reviewed at least once across all sites);
- Monitors must vary the timing of unannounced visits, so they are unpredictable; and
- No more than six months may elapse between reviews.

## Facilities Operating Less than 12 Months

In some instances, sponsored facilities may not participate in CACFP year-round. In addition, sites may be brought onto the Program part way through the year. In the case that the sponsoring organization has facilities that do not participate year-round or did not participate in the beginning of the new fiscal year, this schedule will be followed:

- Facilities operating 0-4 months out of the year must be reviewed one (1) time
- Facilities operating 5-8 months out of the year must be reviewed two (2) times
- Facilities operating 9-12 months out of the year must be reviewed three (3) times

## Monitoring Documentation

Each year during the renewal application, sponsoring organizations will create a planned monitoring schedule for the entire fiscal year of all sites sponsored by completing the [Planned Monitoring Schedule](#). Sponsoring organizations must document all monitoring visits by completing the [Site Review Form](#). The monitor must thoroughly document what was observed during site visits and on the required records. All questions and sections on the monitoring form must be completed. In this process, the monitor will identify any problems and patterns of non-compliance. The monitor must review the results of the monitoring visits with the facility owner, director, or provider. Both the monitor and facility owner, director, or provider must sign the monitoring form prior to the monitor leaving the facility.

Monitoring visits must last through the entire meal session, so the monitor can observe the complete meal service, including meal counts.

The sponsoring organization should maintain a [Monitoring Tracking Log](#) that reports:

- Site name;
- Date of each site review;
- Meal service observed;
- Indicate whether the visit was unannounced;
- Findings observed;
- Corrective actions required;
- Any training or technical assistance provided;
- Follow-up action(s) or date of visit; and
- Date findings are corrected.

In addition, sponsoring organizations of unaffiliated centers must also maintain a serious deficiency tracking log that reports:

- Site name;
- Date of serious deficiency;
- Description of serious deficiency;
- Date serious deficiency letter sent to the State agency;
- Dates corrective action plan (CAP) due and received;
- Date of follow up visit;

- Date serious deficiency was temporarily deferred (if applicable);
- Date the temporarily deferred letter was sent to the State agency;
- Date proposed termination letter (if applicable);
- Date proposed termination letter was sent to the State agency;
- Date center was terminated;
- Date termination letter was sent to the State agency.

### **Five Day Reconciliation of Meal Counts**

Monitoring reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period month. It is preferred that monitors look at the last five previous days of operation to ensure meal counts are being completed at the time of meal service. For each day examined, monitors must use enrollment and attendance records to determine the number of participants in care during each meal service and attempt to reconcile those numbers to the number of breakfasts, lunches, suppers, and/or snacks recorded on the facility's meal count sheet. Based on the comparison, monitors must determine whether the meal counts were accurate. If there is a discrepancy between the number of participants enrolled or in attendance and recorded meal counts, the monitor must attempt to reconcile the difference and determine whether there was an overclaim.

### **Follow-up Monitoring Reviews**

Any problems or non-compliance findings during a site monitoring review must be followed-up to ensure they have been corrected. This may require the sponsor to perform an additional follow-up review of the Program on-site to ensure findings have been corrected. Follow-up reviews do not count toward the three required monitoring visits annually. If the sponsor finds one or more areas of non-compliance during the follow-up visit, the next review of the site must be unannounced.

### **Notification of Unannounced Reviews**

Sponsoring organizations must provide each site with written notification of the right of the sponsoring organization, Vermont Agency of Education, USDA, and other State and Federal officials to make announced or unannounced reviews of its operations during the facility's normal hours of operation and must also notify sponsored facilities that anyone making such reviews must show photo identification that demonstrates that they are employees of one of these entities. The sponsoring organization must provide the notice before meal service under CACFP begins. Unannounced reviews must be made only during the facility's normal hours of operation.

### **Imminent Threat to Health or Safety**

If a sponsoring organization discovers facility conduct or conditions that pose an imminent threat to the health or safety of participants or the public, the sponsoring organization must immediately notify the appropriate State or local licensing or health authorities and take action that is consistent with the recommendations and requirements of those authorities.

## Household Contacts

Sponsoring organizations, as part of their monitoring of facilities, must comply with the household contact requirements established pursuant to [7 CFR 226.6\(m\)\(5\)](#). Household contact means a contact made by a sponsoring organization or a State agency to an adult member of a household with a child in care. The purpose of the contact is to verify the attendance and enrollment of the child and the specific meal service(s) the participant routinely receives while in care. The intent of the household contact system is to investigate potentially inflated meal counts or other questionable CACFP documentation. The State agency has a procedure on when and how sponsoring organizations perform household contacts. The Household Contact Procedure also includes a template letter, survey, and script for sponsoring organizations to use.

### Non-discrimination statement:

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Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. **mail:**  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. **fax:**  
(833) 256-1665 or (202) 690-7442; or
3. **email:**  
[program.intake@usda.gov](mailto:program.intake@usda.gov)

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