



Administrative Review Preparation

THINKING THURSDAYS –

THE CHILD AND ADULT CARE FOOD PROGRAM

MICHIGAN DEPARTMENT OF EDUCATION

FEBRUARY 2023



Welcome to Thinking Thursdays!

- Participants are muted
- Enter your questions into the Q&A, not the Chat
- CACFP staff will answer questions as we go
- Certificate will be emailed
- Thank you for your attendance!

WHO IS HERE TODAY?

- Childcare center
- Family childcare home
- At-risk afterschool care center
- Adult day care center
- Sponsoring organization
- Emergency shelter
- School food authority





Today's Agenda

- Before the Review
- During the Review
- After the Review
- Resources




Things to Consider – Before Review

- Staffing Responsibilities
- Staff Training
- Organizing your CACFP Paperwork



Before a Review: Staffing Responsibilities



Who is
responsible for
each part of
the review?

Start with who
is listed on
your program's
NexSys
Application!



CACFP Staff Training

- MDE Online Training
 - Michigan Department of Education Brighton Bright Track Training
 - Child and Adult Care Food Program Videos
 - Online Training Modules (michigan.gov)
- MDE Guidance Memorandums
- Internal Agency Procedures



Before Review – Organize Your CACFP Paperwork





CACFP On-site Review Basic Information

- CACFP onsite reviews are scheduled every **three years** but could occur more frequently
- Sponsor will be contacted by assigned MDE Analyst to schedule the review
- Unannounced reviews are possible! Have records on-site!
- **Record Retention: Three years plus the current FY**
- Twelve months of records should be on site with others readily accessible within one hour

Before Review – Program Record Organization Best Practices

- Organize records by Fiscal Year (FY)
 - October 1 through September 30
- Sponsor contact information up to date on NexSys application
- GEMS/MARS scheduling letters are sent to responsible individual(s) for announced reviews





GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

MICHAEL F. RICE, Ph.D.
STATE SUPERINTENDENT

10/19/2022

MS. NOLA M. PRINCE
LOVING CARE INC Agreement #880000043
1855 SPARTAN RD
YOUR TOWN MI 48888

Dear Ms. Prince:

The Michigan Department of Education's (MDE) Child and Adult Care Food Program (CACFP) has scheduled an Administrative Review for your organization on 11/22/2022. The person(s) responsible for record keeping, as well as the food service operations, should be prepared for the visit and be accessible throughout the day.

Please confirm receipt of this checklist, the review date and include the address where the documentation review will be completed with Kelli Sigafoose by email to sigafoosek@michigan.gov. I will be arriving at 9 a.m.

The Administrative Review is a comprehensive on-site evaluation to ensure compliance with CACFP regulations, including observation of the meal service. Site visits may or may not be conducted on the same day and are unannounced. The most recent twelve months of records must be on-site the day of the review. An additional three years of records must be accessible in a reasonable period of time, if requested. The following records for the most recent twelve months must be available:

Annual Documentation

* Training: Documentation of CACFP staff and monitor training, for both new and returning staff, including Civil Rights training

* Procurement: Completed Small Purchase Informal Procurement Log(s), vendor contracts or Request for Bid and supporting documentation

* Board of Directors: List of current board members, meeting minutes from the 3 most recent meetings, copy of current members, bylaws, code of conduct policy. We will also need it disclosed if any board member(s) are related to staff.

* Household Income Eligibility Statements (HIES): Current, complete, and correctly categorized (HIES) for all participants claimed in Category A (free) or B (reduced pricing) NOTE: HIES forms should be available in a single file, rather than in a separate file for each child, and should be in alphabetical order by classroom (as applicable).

* Participant Enrollment Forms: Current and complete forms for all enrolled participants. These should be organized the same as the HIES

Review Scheduling Letter

- GEMS/MARS generated Email
- Sent to NexSys Sponsor Contact
- Detailed list of what is required

Annual documentation

Monthly claim documentation

Menu/meal pattern compliance

Site monitoring*

Other items



Before the Review: Getting Ready

1


Review prior CACFP reviews findings

2

Ensure any non-compliant issues have been corrected

3

Contact your analyst with any questions



CACFP Records Binder

Household Income Eligibility Statements (HIES)

Participant Enrollment Forms

CACFP Staff Training Documentation

Civil Rights Documentation

Infant Formula/Food Sign Off Forms

Procurement Log

CACFP Cost Documentation

Supporting Documentation for Monthly Claims

Sponsoring Organization Records*

Items you will need:





Household Income Eligibility Statements (HIES) – Option One

- Use Three Separate Tabs
 - *Free* “Category A” Income Statements
 - *Reduced* “Category B” Income Statements
 - *Paid* “Category C” Income Statements
- Alphabetize Participant’s HIES within each reimbursement category tab
- Children of same family can be on one form
- Establish a system to capture different last names for a family unit

Free

Reduced

Paid



HIES – Option Two

- Use one tab for all HIES
- Alphabetize HIES
- Children of same family can be on one form
- Establish a system to capture different last names for a family unit

Household Income Eligibility
Statements



CACFP Participant Enrollment Forms

- Remember to have parent/guardian update annually
- Keep in alphabetical order

Participant Enrollment
Forms



HIES & Enrollment Forms Best Practice

- Match up Participant's HIES and Enrollment form
- Alphabetize together categorized by Reimbursement Category
- Fastest option for analyst at review

HIES & Participant
Enrollment Forms



CACFP Staff Training Documentation



Dated training agenda



Specific topics covered



Participant list by first and last name



Facilitator/Instructor name by first
and last name



Civil Rights Documentation

- Ethnicity and Racial Beneficiary Form
 - Completed annually
 - Sponsoring Organization will complete one for each facility
- Civil Rights Training Documentation
 - Completed annually
 - Training date
 - Topics covered (resource used)
 - Attendance by first and last name

Civil Rights



Infant Formula/Food Signoff Statements

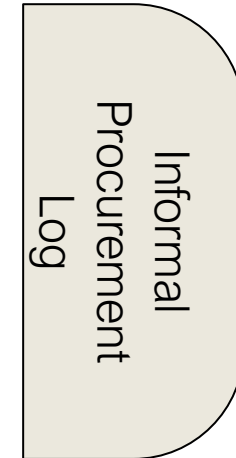
- Will have 1 for each infant you have enrolled until their first birthday
- Informs parents which infant formula and other foods for infants are provided by your center
- File in alphabetical order
- *Instructions & Forms, Infant Menu Information link*

Infant Food/Formula
Signoff Statements



Informal Procurement Log

- Log to be completed annually
- List items that support a typical weekly CACFP menu
- Compare three vendors
- Provide rationale for purchasing decision(s)
- Helps to determine best use of federal funds
- *Instructions & Forms, Annual Administrative Forms, Procurement & Pricing Programs link*





CACFP Cost Documentation

Labor Costs*

- Administrative and Food Service
- Time and Attendance Log
- Pay roll stubs
- Simple calculation, if applicable

Receipts/Invoices

- Separate food, non-food supplies, and non-CACFP expenses on receipts/invoices
- Highlight or mark cost type on receipts
- Write totals for each category on receipts/invoices
- MDE Summary of Costs Form

Labor Cost
Documentation

Food/Non-Food Cost
Documentation



Supporting Documentation for Monthly Reimbursement

- Claim Status Report
- Date point of service meal count sheets
- Sign in/out records (attendance)
- Infant meal records (*if applicable*)
- Date menus (including substitutions)
- Vended meals delivery tickets

October

November

December



Sponsoring Records

(for sponsoring organizations only)

- Site Monitoring documentation
- Dated training agendas and sign-in sheets
- Documentation of 2 required edit checks

Sponsoring Records

Tips for Larger Agencies



Instead of using a binder, use a portable file storage system



Create and label a file folder for each section

Electronic records



- Have a back-up to your back up and then back up again!
- MDE must be able to access records on-site
- Be able to have 12 months of records on site
- Be able to provide access to prior records in a timely manner
- Again - back them up!



Additional Items Needed for a CACFP Review

- CACFP Guidance Memorandum Binder*
- Sample enrollment packet given to parent/guardian of newly enrolled child/infant
- Parental Notification Flier - (CACFP Building Future Flyer)
- WIC Information – Facts about WIC *NEW POSTER AVAILABLE*
- Parent Handbook/Policy Book
- “...And Justice for All” poster prominently displayed
- Child Nutrition (CN) Labels and Product Formulation Statements (*if applicable*)
- Standardized Recipes
- Product Labels of items typically served

Additional Items Needed - Continued



Current Vendor Contract Agreement and delivery/transportation Tickets *(if applicable)*



Special Dietary Needs Medical Statements *(if applicable)*



A workspace for the analyst



A list of questions/concerns you have



REVIEW TIME!

BREATHE!

During the Review:

Is someone available for the duration of the review?

- should be the authorized representative/director or main person in charge of the CACFP
- MDE will review the process with contact person
- Contact must be available for questions the day of the review





During the Review Continued:

Areas of CACFP operation that will be evaluated:

- Records and recordkeeping process
- Food storage/preparation area
- Food product documentation
- Program attendance
- Menu planning process
- Meal service
- Meal attendance
- Claim consolidation process
- Site Monitoring (sponsoring organizations)



During the Review

- MDE will review your records for compliance for a claim month (more as necessary)
- MDE will observe a meal service
- Review menu and product information for meal pattern compliance
- Cost documentation/milk purchases
- Observe And Justice for All poster is prominently displayed
- WIC Poster



After the Review:

Exit Conference

- Recommendations and guidance
- Findings/Corrective Action Plan
- Fiscal Action, if applicable
- GEMS/MARS technical assistance



GEMS/MARS



- The administrative review form is completed by the MDE on GEMS/MARS
- Your program must have access to GEMS/MARS to review the report and any findings
- Your corrective action plan will be entered and uploaded into GEMS/MARS for analyst review

After the Review: *Finding/Corrective Action*

A *Finding* is an issue of non-compliance identified during the CACFP review

A *Corrective Action Plan* is a written response stating how a finding will be corrected

Responding to Findings on Corrective Action Summary Form

CORRECTIVE ACTION MUST
PERMANENTLY AND COMPLETELY
CORRECT THE PROBLEM(S)






After the Review

Corrective Action Plan (CAP)

- Written responses to address finding(s)
 - Step by step policies and/or procedures that will be implemented to address finding so agency complies with edit checks
 - **Who** completes each step
 - **When** each step will be completed
 - **Date** of implementation
 - **Where** documentation will be kept
 - **How** staff will be trained or informed of new policies / procedures
- **Additional supporting documentation** showing your agency has completed a requirement or is now in compliance



Sample Corrective Action Plan (CAP)

Sample Finding: Meals served do not meet CACFP meal pattern requirements

- 1st submitted CAP: “*The old cook left. We now have a new cook and will serve good meals.*”



Sample Corrective Action Plan - Revised

Revised submitted CAP for sample Finding - Meals served do not meet CACFP meal pattern requirements

- New cook, Angie, hired June 3.
- Cook trained on the CACFP meal pattern and creating creditable menus by Director on June 4.
- New cook was given the CACFP Crediting Handbook and will complete the MDE Brighton and MDE Meal Pattern Modules by June 30.
- After cook creates menus and completes production records, the director reviews for compliance. Angie creates the next month's menus by the 15th of every month and the director reviews by the 20th.
- Menus are posted at the entrance and in the kitchen and kept on file as claim support documentation in the CACFP binder which is kept in the director's office.
- This CAP was implemented June 3.

Included with the written plan is a copy of June's menus to demonstrate our agency is now in compliance with the meal pattern requirements.



After the Review Continued

Corrective Action Due Dates

- Be mindful of corrective action due date(s)
- Due date will be discussed with you
- Will be noted on your GEMS/MARS Review form



Are you ready for a review?

If MDE arrives unannounced will staff be ready?

Is your staff trained?

Are your CACFP records organized and readily available?

If there are review findings, are you comfortable providing a corrective action plan?

Resource: Supporting Documents Handout

Michigan Department of Education Child and Adult Care Food Program

Supporting Documents

Annual Documents

- Annual Staff training documentation for Civil Rights and CACFP
- Procurement Documentation: Informal Procurement Log(s); formal procurement documentation and/or approved food service contract(s), as applicable to your program
- Household Income Eligibility Statements (HIES), as applicable to your program
- Participant enrollment documentation, as applicable to your program
- Civil Rights – Completed "Ethnicity/Racial Beneficiary Data Form" for each site

Monthly Documents

- Dated menus, indicating meals/snacks served for participants ages 1 year and over
- Dated infant menu records indicating infant's name & birth date and meals/snacks served
- Meal attendance records – "point of service" records
- Record of adults (staff) served meals
- Daily program attendance records
- Documentation of costs*: Food, Non-food supplies, administrative costs/labor, food service labor, Indirect, Depreciation, Allocated Costs, and Allocation Cost Plan, as applicable
- Proof of residency (emergency shelters only)
- Proof of living independently (adult day services only)
- Program income, if applicable (catering, meals sold to staff, etc.)
- **For profit center:** Department of Health & Human Services (DHHS) 1381 report indicating payments received for care provided (documentation that 25% of the center's enrollment or capacity were Title XX beneficiaries) or documentation to support free or reduced-price eligibility. (For Adult Day Services: Title XIX beneficiaries)

Other Required Records

- Proof of tax-exempt status (non-profit organizations only)
- Request for Special Dietary Needs Form(s)
- Formula/Food Sign-Off Statement for all infants enrolled in care
- License or alternative approval documentation, as applicable
- WIC Poster or information (licensed childcare sites/facilities only)

Sponsoring Organizations Only:

- Household contact procedure
- Site monitoring tracking tool/schedule
- Completed site monitoring forms
- Participant/Parent Information Sheet

Recommended Documents - But Not Required

- MIND claim month status report
- Meal attendance summary form
- Summary of costs form
- Record of Milk purchased form



REMEMBER

- CACFP records do NOT go on field trips!
- Records must be available at your center during normal business hours.



Administrative Review Resources

For electronic system information:

- Requesting Access to the GEMS/MARS link in Mlogin for Third Party
- Summary of all Child Nutrition Program Systems
- Steps to Child Nutrition Program Systems Access
- Child Nutrition Program Systems Access Flowchart

MDE Webpage Resources

Resources Link

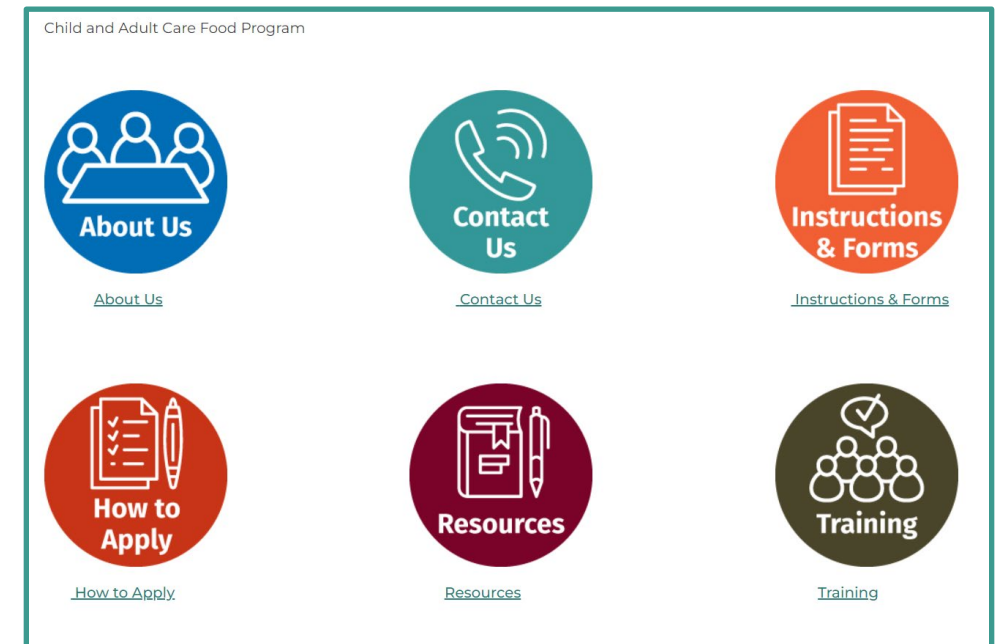
- Memos for Independent Centers and Sponsor of Centers
- Family Day Care Home Sponsor Memos

Additional Resources Link

- CACFP Handbooks | Food and Nutrition Service (usda.gov)

Instructions and Forms

- Forms and instructions





Thank You!

Any questions? Contact us!

Michigan Department of Education
Child and Adult Care Food Program Staff
P.O. Box 30008,
Lansing, MI 48909
Phone: 517-241-5353 Fax: 517-241-5376
Email: MDE-CACFP@michigan.gov
Child and Adult Care Food Program Website:
www.michigan.gov/cacfp



Nondiscrimination Statement

- In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.
- 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, audiotope, 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: [USDA Program Discrimination Complaint Form](#), 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
- This institution is an equal opportunity provider.
- USDA Civil Rights Complaint Link:
<https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>