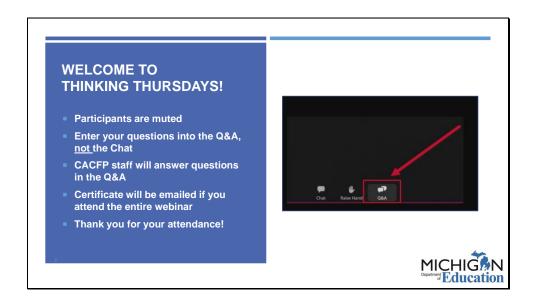


Welcome to today's Thinking Thursday: Sponsoring Organizations Site Monitoring Responsibilities. If you are from a Sponsoring Organization, this presentation is for you. If you are from an independent center, this knowledge is probably not necessary, unless you are considering expanding out to more than one site and becoming a Sponsoring Organization. (Next slide)

Inspired by: Guidance Memorandum 5: Sponsoring Organization Requirements (All Sponsors: 2 or more sites on the CACFP) (wi.gov); Serious Deficiency Suspension and Appeals Handbook (fns.usda.gov);



To begin, let me introduce myself. My name is Melissa Lonsberry. I am a Consultant for the CACFP. I will also be joined later in the presentation by Terri Thelen, CACFP program analyst. There are also several other CACFP Staff members here on the call. We are happy you are here to learn with us today.

Some quick housekeeping: All participants are muted for this presentation. If you look down at the bottom of this zoom presentation screen, you will see a chat box and a Q&A box. Please enter any questions in the Q&A and not in the chat box. The chat is for chatting. It is hard for staff to see questions and, therefore, your question may get lost in the chat box as people interact.

Entering your question in the Q&A helps us moderate your questions and answer them easier during the presentation and at the end. Other participant's can see your question and the answer, so we all can learn together.

Questions will be answered either by my CACFP staff co-hosts along the way or live at the end of the session, if we have time. If we run out of time, we can follow up with you by email after the session. This session is being recorded and will be posted on our website under Trainings, along with the power point slides and notes for you to reference later.

Training Certificates will be sent to participants via email after the presentation. You have to stay for the duration of the recording to receive a certificate.



## WHO IS HERE TODAY?

- Sponsor of At-risk afterschool programs
- Sponsor of childcare centers
- Sponsor of family childcare homes
- Sponsor of family childcare homes and childcare centers
- Sponsor of adult care programs
- Sponsor of childcare and adult care programs
- School food authority



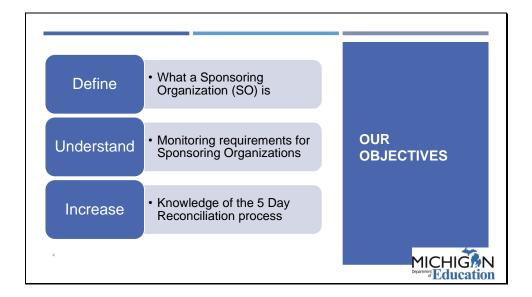
#### Poll Slide

Before we discuss feeding infants in the CACFP, We want to know who has joined us today. Let us know who you work for by selecting one of the options on our poll.

Do you work for a: (launch poll)

- Sponsor of At-risk afterschool care programs
- Sponsor of childcare centers
- Sponsor of family childcare homes
- Sponsor of family childcare homes and childcare centers
- Sponsor of adult care programs
- Sponsor of childcare and adult care programs
- School food authority

Display the results and briefly discuss "It looks like we have ..... in our audience today. Thank you for joining us today. Remember to type any questions in the Q&A box.



The webinar's Objectives are as follows:

Be able to define what a Sponsoring Organization is Understand monitoring requirements for Sponsoring Organizations Increase knowledge of the 5 Day Reconciliation process

## **TEST YOUR KNOWLEDGE!**

Why is site monitoring important?

- A. Ensures program guidelines are being followed
- B. Ensures participants are receiving nutritious meals
- C. Provides Sponsor opportunity to provide training/technical assistance
- D. Allows site to develop a corrective action plan to correct any findings
- E. All of the above

5



## Poll Slide:

Why is site monitoring important?

- A. Ensures program guidelines are being followed
- B. Ensures participants are receiving nutritious meals
- C. Provides Sponsor opportunity to provide training/technical assistance
- D. Allows site to develop a corrective action plan to correct any findings
- E. All the above (correct answer)

SPONSORING ORGANIZATION (SO) DEFINED A SO is an agency with full administrative responsibility for two or more centers/homes.

There are two types of sponsored sites/facilities:

- Affiliated: site(s) is/are the same legal entity as SO
- Unaffiliated: is/are not the same legal entity of the SO and are legally distinct from the SO



To begin, a SO is an agency that has full administrative responsibility for two or more sites/facilities participating on the CACFP.

There are two different types of sponsored centers or homes:

- 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



- Site reviews must be conducted at all sponsored facilities
- Monitoring staff should not work at the site(s) they monitor
- SO must inform sites of the right of SO, MDE, USDA or other State or Federal offices to make unannounced/announced review visits during regular hours of operation
- MDE or USDA staff must show photo ID to come into a site facility



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

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

As a sponsor, you must provide each site with written notification of the right of the Sponsor, MDE, USDA, and other State and Federal officials to make announced or unannounced reviews during a site's normal hours of operation to review CACFP operations at that site. This notification must inform sites that anyone making such reviews must show photo identification that they are employees of one of these entities.

• This notification of reviews by state and federal staff applies to all sites, even if the site is the same legal entity as the SO.

Provide review notification to new sites prior to the start of service under the CACFP

#### SO MONITOR RESPONSIBILITIES **Monitoring-Related Activities Non-Monitoring Related Activities** Planning and scheduling Determine/verify facility eligibility Travel to/from Program outreach, recruitment, and Supervisory oversight retention Writing review report Initial and annual training Conduct follow-up reviews Phone technical assistance Parental contacts Claims processing/claim reimbursements Conduct training Enrollment paperwork **Provide Technical Assistance (TA)** Serious Deficiency process, as applicable

So what does a Site Monitor do?

Well, they do activities related to conducting on-site reviews such as:

- planning and scheduling site reviews, pre-review preparation, travel to and from the site(s), supervisory oversight of monitors, writing review reports, conducting follow-up reviews, and activities related to the serious deficiency process as necessary
- They could also do parental contacts: conducting parent contacts or parent surveys to help determine the validity of a provider's claim
- Provide on-site training: all on-site training that occurs during a facility review
- Provide technical assistance: if provided during a review
- claims processing: menu reviews to determine claim accuracy and meal
- eligibility

All time spent in the facility during a site review is considered monitoring-related.

Non Monitoring-related activities may include (depending on your needs):

- facility eligibility: day care home tiering determinations, facility licensing status, facility applications and agreements
- program outreach: recruitment/retention activities
- initial and annual training
- technical assistance: if provided over phone
- claims processing/claim reimbursements
- enrollment paperwork

## **MONITORING STAFFING STANDARDS**

**Sponsors of Centers:** 

One full-time equivalent (FTE) for 25 - 100 centers

**Sponsor of Family Childcare Homes:** 

One FTE for every 50-150 homes

Monitors may perform both monitoring and nonmonitoring duties

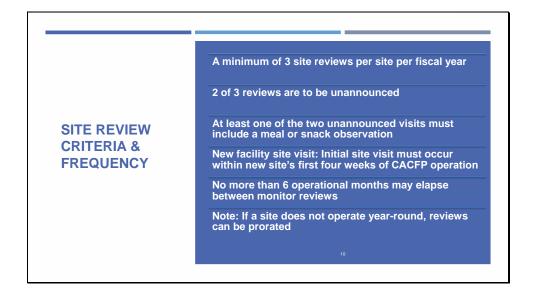


## Monitoring staffing standards:

Sponsors of Centers are to devote one full-time equivalent (FTE) staff member for 25-100 centers

FDCH one FTE for every 50-150 home sites Monitors may perform both monitoring and non-monitoring duties

This information must be entered into the NexSys application annually. This will help you to determine if you have enough monitors for your SO.



## Site Review Criteria and Frequency

and you are in compliance.

For a typical center or family childcare home open year-round, a minimum of three (3) site reviews per site per fiscal year (October 1 – September 30)

If a site does not operate year-round, reviews are prorated

Visits are to be unannounced (based on number of reviews)

Visits are to include a meal observation (based on number of reviews)

Please refer to the monitoring memo for more specifics. This should be used when planning your review schedule for the year. It will ensure that all these criteria are met

# PRE-OPERATIONAL SITE 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



-11

A pre-operational or "new site" visit must be completed prior to a new site beginning its CACFP operation. Sites that move to a new location are considered a new site and must also be monitored during the first 4 weeks of operation. This is to ensure the site is equipped to operate the CACFP. It also helps to ensure that site staff have been trained on CACFP program requirements.

	IONING FAC	DRATION TABI	- <b>L</b>	
Site Operational Months	Number of Reviews	Number of Unannounced	Number of Meal Observations	
1 - 3	1	1	1	
4 - 9	2	1	1	
10 - 12	3	2	2	

Frequency and Type of Reviews A minimum of three (3) site 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, discussed more in a few minutes.

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 each month, it is an operating month

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 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)

#### REVIEW AVERAGING OPTION EXPLAINED

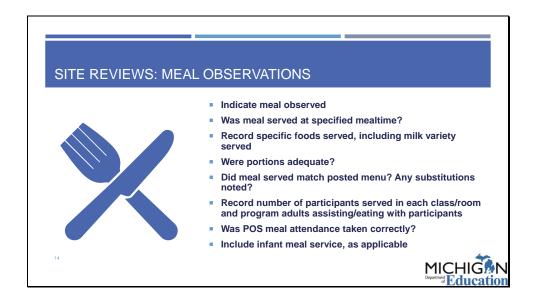
- Can average facility reviews
- Enables SO to monitor sites that need more assistance more often by visiting sites in good standing one less time
- Newer facilities or those with a history of operational problems can receive more support and oversight
- Must notify MDE you will use review averaging and how implemented
- Must contact same total number of reviews a year
- Note: Each facility must still receive two unannounced reviews per year

MICHIGAN Partment Education

Review averaging: What does this mean, exactly?

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.

The sponsor must inform the Michigan Department of Education (MDE) that it will utilize the "review averaging" option and must describe how it plans to implement it. This notification would take place inside the NexSys Coordinated application. I don't believe there are currently any CACFP sponsors that utilize this option however more information can be found in the memo that we mentioned earlier. Please reach out to your analyst if you have further questions about this option.



Observing a meal in a federal nutrition program helps the sponsoring organization to verify the facility's compliance with the meal pattern. Although a meal observation is not required during every monitoring review, please keep in mind that you are operating the Child and Adult Care Food Program. A best practice would be to include a meal observation at every visit.

Be specific when documenting what was actually served. For example if a snack of Hummus and pita bread is served, indicate if the pita bread is WG rich. This will help to determine that at least one WG item is served for that day.

Remember to observe infants, as applicable. Is the infant menu record being recorded after the infant has been offered food? (Not before).

### Monitors are to:

#### Indicate meal observed

- Note if the meal was served at specified meal time on application?
- Record the specific foods served to meet meal pattern requirements, remember including milk variety served (Whole, low fat or skim? Flavored or unflavored)
- Were portions adequate to meet portion requirements?
- Did meal served match what is shown on the posted menu? If not, were menu substitutions noted?
- Record number of participants served in each classroom and program adults assisting/eating with participants
- Was POS meal attendance taken?
- Include infants, as applicable to the facility

We will be going through a site monitoring review towards the end of the presentation.

### VARIED TIMING OF UNANNOUNCED REVIEWS

- Timing of reviews must be unpredictable to sponsored facilities
- Vary month, week, day, time of day meal observed
- Variance enables the sponsor to see how the facility operates daily, provide technical assistance, and initiate immediate corrective action

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Department Education

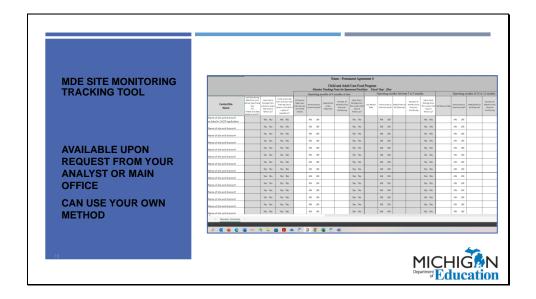
## Varied Timing of Unannounced Reviews

Sponsors must vary the timing of unannounced reviews so they are unpredictable to their sites.

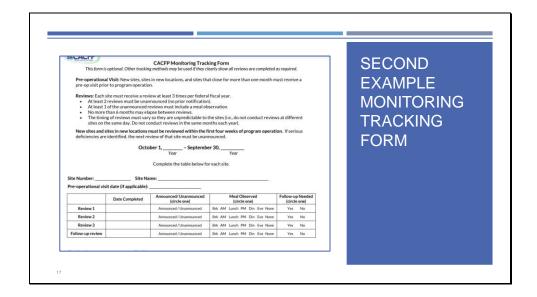
Unannounced reviews that follow a consistent pattern (for example, unannounced reviews that always occur during the third week of January, the third week of May, and the third week of September, or reviews that never occur during the first week of the month when claims are being processed) undermine the intent of the CACFP's unannounced review requirements.

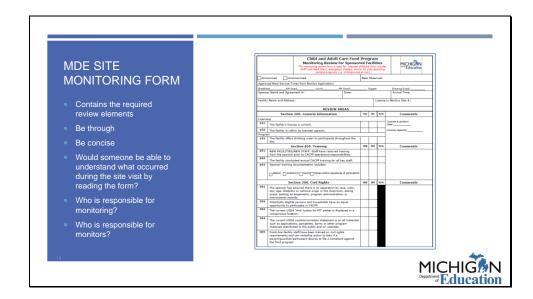
Sponsors are less likely to uncover management deficiencies and Program abuse if facilities can anticipate when their "unannounced" sponsor review is due to occur. Therefore, sponsors now must ensure that the timing of unannounced reviews is varied in a way that would ensure they are unpredictable to the facility. It is better to vary the month, week, day, time and meal observed. It sites are open on weekends or holidays, monitors should flex schedules to visit sites on those days as well. MDE does this, too.

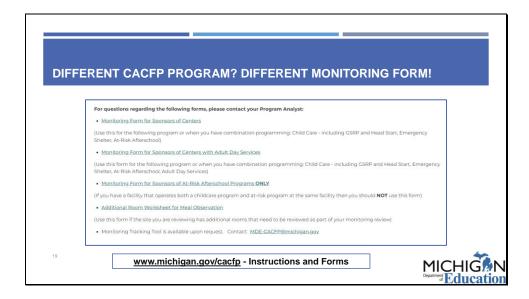
Unannounced reviews are an effective tool in ensuring program integrity. They give sponsors the opportunity to document how the site operates on any given day and to offer any technical assistance. In addition, a varied schedule offers a first-hand opportunity to detect and identify areas of mismanagement, such as inaccurate meal counts, problems with recordkeeping, and menu and enrollment discrepancies. Sponsors can then initiate immediate corrective action.



On the slide is MDE's site monitoring tracking tool. It is available upon request from your analyst or contact our main office. You can also use your own method.







MDE has different monitoring forms for different programs other than childcare. Sponsors of childcare sites (childcare and preschool programs like HS and GSRP) would use the Monitoring Form for Sponsors of Centers. This form can be used if there is a combination of programs at the facility being monitored.

Sponsors that oversee Adult Day Services centers can utilize the monitoring form for Adult Day.

Sponsors that oversee at risk after school programming would use the form tailored towards afterschool programs.

Each version of these monitoring forms have the required review elements within them to ensure your are observing what you need to during a site review.

Remember you can add to them, but do not take away any sections. If a section does not apply, mark it Not Applicable.

## SITE MONITORING CONTENT REQUIREMENTS

- Licensing Information, if applicable
- Civil Rights requirements and staff training
- CACFP Training of staff and monitors
- Meal counts
- Daily attendance
- Menus
- Meal observation
- Enrollment forms and household income eligibility statements (as applicable to site/program)
- Correction of past findings, if applicable
- Complete the Five-day meal count reconciliation



Facility reviews must include assessment of sites compliance with Program requirements pertaining to:

Licensing

Civil Rights requirements and staff training

CACFP training of staff and monitors

Meal counts and daily attendance

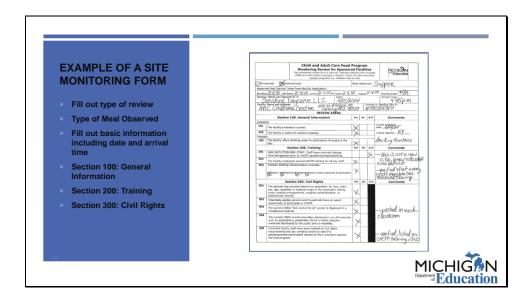
Menus and meal observation

Enrollment forms and income eligibility statements (as applicable to facility program)

Correction of past findings, if applicable

Five day meal count reconciliation

Now we are going to have Terri go over a site review form from a review she recently did.



Now we are going to go over a review from ABC childcare center. The Sponsoring organization is Sunshine Daycare LLC.

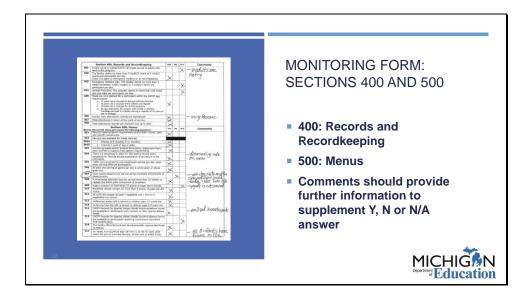
This is an unannounced supper review that was conducted on 2/15 by me. I arrived at 4:45 p.m. and I indicated the times of meals and snacks according to what was recorded in the NexSys coordinated application. I've also indicated the license number and site address.

Notice how every box is completed. If something doesn't apply, simply write N/A.

Section 100: General Information – note the license expiration date and licensed capacity. If the license is expired and the site is waiting for a licensing visit, this should be noted as well.

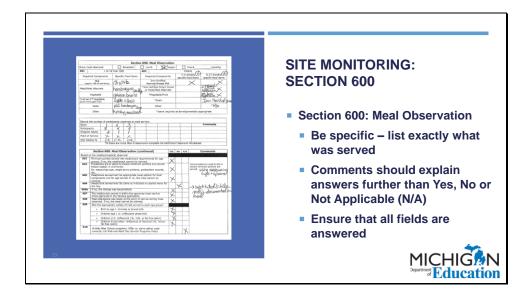
Section 200: Training Information – note any particulars in the comments.

Section 300: Civil Rights- notes in comments



Notice on this form that the monitor indicates what they used to verify compliance with WGR and Sugar Limits. (asterisks by question number and noted in comments in more depth.)

N/A: Make sure you mark not applicable if a question is not relevant to the specific site. If you leave it blank, MDE or the USDA cannot tell if the question was adequately addressed.



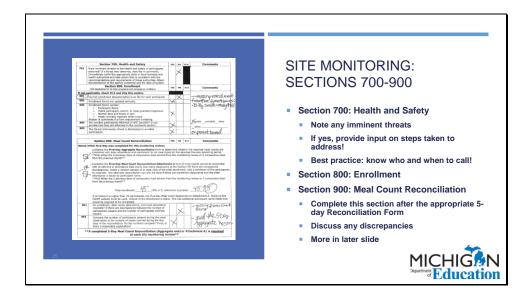
## Meal Observation:

Note that the actual foods served for each meal component are filled in. Do not just put an "x" in the boxes. The monitor even included condiments in the "other" foods field.

The Infant meal observed is also filled in. If they are serving infants enrolled for their care, they should have infant meal records. Remember, it is potential age discrimination to deny access to participation based on age.

Sportering Organization Name:    Agreement #:	Facility Name:   License #		Additional Roo					
Room Comments District of participants observed during the meal service:    South Comments   Comments   Comments   Comments	Room Pertogents Program Adults Poster of Service Room Pertogents Program Adults Poster of Service Room Retrogents Room Retrogents Room Retrogents Room Retrogents Room Retrogents Room Retrogents Program Adults Poster of Service Room Retrogents Program Adults Program Adults Retrogents Room Retrogents Program Adults Program Adults Program Adults Program Adults Program Adults	Sponsoring Organization Nar	me: Agreement #:			ent #:		
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Point of Service  Milk Variety Served    Name of participants observed during the meal service:   Room   Ourments     Pertopants     Program Adults     Point of Service     Program Adults	Point of Service	Participants						
Point of Service  Milk Variety Served    Milk Variety Served	Police of Service    Milk Variety Served      Record the number of participants observed during the meal service:   Room   Comments     Principants     Program Adults     Project of Service	Program Adults						WORKSHEET
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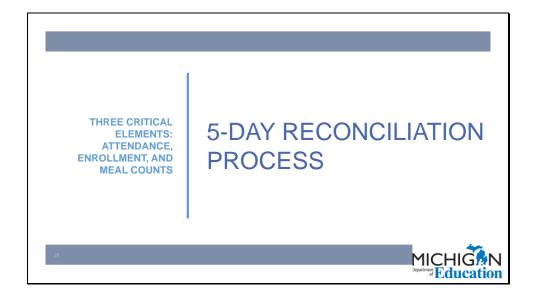
MDE also has an addition Meal Observation worksheet if you need more space to capture meal observations at sites with multiple classrooms. It is a best practice to have a few extra of these in your monitoring materials.



700: Heath and Safety-hopefully this is "no" answer. We will discuss this a little later.

800: Enrollment

900: Meal Count Reconciliation- there are 2 options to complete this section which we will jump into right now. One thing to note, make sure you jump back and answer these questions after the 5 Day reconciliation is completed.



So let's go over the 5 Day Reconciliation Process.

There are three critical elements of program compliance that we look at during this process: attendance, enrollment and meal counts.

### 5 DAY RECONCILIATION: TWO OPTIONS AVAILABLE

#### Participant Name (Attachment A)

- Meal counts, enrollment records and program attendance reconciled
- Completed by participant full name
- Random sample of at least 10% of facility's enrollment or minimum of 5 participants
- Best option for multiple classrooms at one site

#### By Aggregate Count

- Meal counts reconciled to program attendance records
- Used for At-risk Afterschool programs and Emergency Shelters
- Can be used for centers (at discretion of monitor if in good standing previously)
- Participant names not required
   If discrepancies are noted between

attendance, and meals, complete
Attachment A (only for enrolled
programs)

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Source: <u>CACFP 10-2018</u>: <u>Conducting Five-Day Reconciliation in the Child and Adult Care Food Program, with Questions and Answers (michigan.gov)</u>

There are two options for completing the 5 day reconciliation requirement.

#### Attachment A

This method is done by the participant's full name. This is typically done with enrolled programs, such as child or adult care.

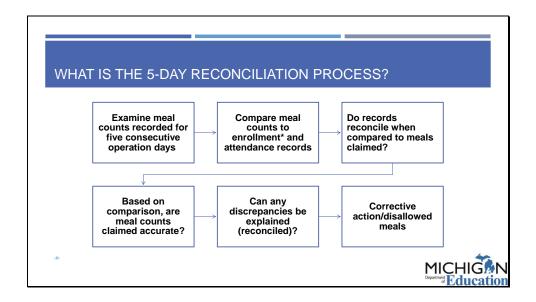
A random sample of at least 10% of the facility's enrollment or a minimum of 5 participant's is required

This option is the best when a facility has multiple classrooms at one site

The second method of completing the 5 Day is by aggregate count This is primarily used for at risk afterschool programs and emergency shelters (non enrolled programs)

It also can be used for a child or adult care facility at the discretion of the site monitor. This would be appropriate if the facility has been in good standing in the past and there are no red flags to indicate any issues present during the current review. They may start with Aggregate if easier and if no discrepancies between attendance, enrollment and meals then they have no need to participant name. However, it may be easier to do random children by name for large multi-classroom sites as mentioned early.

If however, discrepancies are found during the review on the aggregate count 5 day, then the Attachment A form should be completed to pinpoint the discrepancies.



Reviews must examine the meal counts recorded by the facility for five consecutive days during the current and/or prior claiming period. For each day examined, reviewers must use enrollment and attendance records (\*except in at-risk afterschool care centers, and emergency shelters where enrollment records are not required) to determine the number of participants in care during each meal service and attempt to reconcile those numbers to the numbers of breakfasts, lunches, suppers, and/or snacks recorded in the facility's meal count for that day. Based on that comparison, reviewers must determine whether the meal counts were accurate. If there is a discrepancy between the number of participants enrolled or in attendance on the day of review and prior meal counting patterns, the reviewer must attempt to reconcile the difference and determine whether meals were overclaimed (disallow meals). Meals will not be disallowed if there is a reasonable explanation for the discrepancy.

FIVE CONSECUTIVE OPERATING DAYS

## How are the five consecutive days determined?

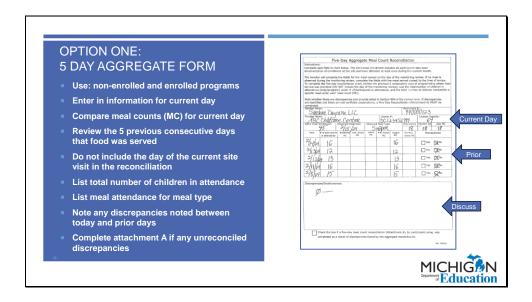
- Select 5 consecutive operating days
- Include weekends and holidays if site open
- May have to go back to previous weeks to obtain 5 days of food service operation



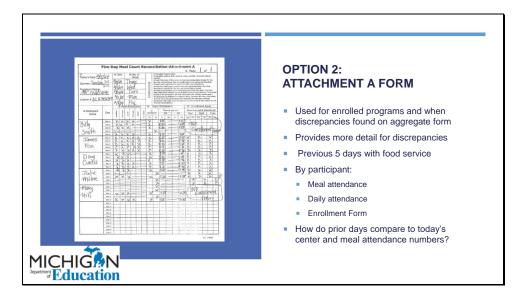
## How are the five consecutive days determined?

Select 5 consecutive operating days Include weekends and holidays if site open May have to go back to previous weeks to obtain 5 days

It's important to note that the 5 previous days should not include the day of the site review.



First we will discuss using the 5 Day Aggregate Form. This form showed that 18 children were in attendance on the day of the site review and 18 suppers were served. This information was compared to the previous 5 days and no discrepancies were found. A discrepancy would be if more children received a supper that were in attendance. An example of this would be, if 15 children were in attendance and 19 were recorded for supper. In that case, the monitor would need to check the box at the bottom of the form and then complete the other option, attachment A which we will discuss next.



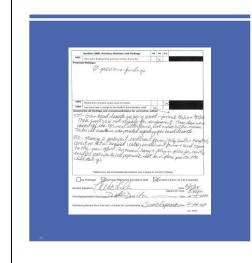
Here is what a 5 Day meal count reconciliation- Attachment A would look like for a childcare center. This option is not used for ARAS sites.

As you can see this form goes into a lot more detail. It is child specific. It includes the days and times the child was in care, and what meals and snacks they received. It then compares it to the child's enrollment form. As you can see in this example, Billy Smith and Mary Hill did not have enrollment forms on file. Also, Julie Miller's enrollment form did not match the days and times in care for 2 of the days. The monitor noted that the child was ill. So this is acceptable.

Other discrepancies that you would look for include the times in care and if a meal or snack was received. For example, if a child attended care from 8 a.m. to 1 p.m. and was marked for a p.m. snack and a supper, this would be a huge discrepancy and would warrant further investigation. You might even need to increase your sample size from 5 children to 10 or even reconcile a 2nd week.

Of course, just because you find a discrepancy doesn't always mean there is a problem. Perhaps the internet went out that day and they needed to use manual sign in and out sheets for the day rather than the electronic attendance system. After further investigation, you determine that the child was in attendance until 5:30 that day, warranting a pm snack and a supper.

The monitor should discuss all discrepancies with the site director to see if there was a reason for the discrepancy.



## SECTION 1000: PREVIOUS REVIEWS FINDING AND SUMMARY OF FINDINGS PAGE

- Note previous findings from prior review
- Were prior findings corrected?
- Has there been a change to administrative staff?
- Summary of Findings and Recommendations for Corrective Action:
  - Reference form question that finding pertains to
  - Write suggested corrective action for each finding under that finding
- Note any technical assistance provided
- Note due date of corrective action
- Obtain signatures, date, time completed





Be concise. Can another person understand what you observed? Be specific Example: Meal observed. Can another know exactly what was served? Complete all sections – if you don't write it, it did not happen. If something is not relevant, mark N/A rather than leaving it blank.

Ensure 5 Day Reconciliation is completed – you do not have to complete both unless there is a discrepancy.

Sign and date form

## SITE NON-COMPLIANCE: FOLLOW-UP METHODS

When non-compliance is noted during a site review or a site's claim raises concern about non-compliance, the SO must conduct a follow-up visit to investigate and resolve the issue.

Follow up methods may include the following:

- Conducting an <u>unannounced follow up</u> review to that site
- In-depth review of claim data for prior months
- Household contacts\* to verify participant attendance



When non-compliance is noted during a site review or a site's claim raises concern about non-compliance, the SO must conduct a follow-up visit 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:

- Conduct an additional unannounced follow-up review. Documentation must show what corrective action was taken.
- 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.

## SITE MONITORING: BEST PRACTICES

- ✓ Maintain the Sponsor Site Monitoring Tracking Tool throughout the vear
- ✓ Complete ALL reviews UNANNOUNCED
- ✓ Complete a meal observation at EVERY monitoring review
- √ Have a second person check reviews for completeness
- ✓ Review the previous monitoring review prior to your next site review
- ✓ Put notes in the comments sections of the review form or mark n/a.
- ✓ Be thorough

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