

## **ADULT DAY CARE CENTER MONITORING FORM INSTRUCTIONS SPONSORING ORGANIZATIONS ONLY**

The Adult Day Care Center Monitoring Form is designed to be used by administrative and center sponsors in reviewing their sponsored adult day care centers. Follow the instructions below when completing a review. Check “No” if the center is not meeting the requirement or check NA if the item is not applicable. Most items answered as “No” will require a finding and corrective action. Some items answered as a “No” will only require technical assistance. Both should be documented on the Summary of Findings page. Separate technical assistance items from the findings at the bottom of the form.

### **First Table**

Record date of review. Indicate whether the visit is the first, second, or third of the fiscal year by selecting the appropriate box. Check whether the review is unannounced. **Indicate whether this review will include an assessment of non-profit food service and procurement by selecting the appropriate box.** Record arrival and departure times and the reviewer’s name.

### **Center Information**

**Name of Center and Telephone Number:** Enter the legal name and the name the center is doing business as.

**Telephone Number and Address:** Enter the center’s telephone number address.

**Number Enrolled:** Enter the number of enrolled participants as indicated on the roster.

**Eligibility Method:** Check whether the center is a profit or non-profit organization.

**Approval Type:** Indicate whether the center is a Medicaid Program recipient, a state operated facility, or approved by a federal, state, or local authority. Indicate approving authority.

**Approved Meal Types:** Check all the meal types the center is approved to claim as stated in the application.

### **Approval to Participate in CACFP**

**Items 1-2:** Indicate if documentation is on file to support the center’s approval to operate from a federal, state, or local authority. Indicate if the documentation is current and/or valid. Centers that do not have the required documentation on file for review must be cited for failing to keep required records and provide an adequate corrective action response.

Federal regulations require that adult centers participating in the CACFP be licensed or approved by federal, state, or local authorities and compliant with applicable procedures to renew licensing or approval. Currently, Georgia does not license adult centers. Any federal, state, or local government agency which funds or operates programs for adult care and has written standards that the center must meet to qualify for that program funding, can be used to demonstrate approval to participate in the CACFP. The written standards and approval must be focused on the adult care services that will be delivered to their adult participants.

Approval under the Community Services Care Program is one [1] example of a federal program a center may use to demonstrate approval to qualify for the CACFP. The Community Services Care Program administers the Medicaid program in Georgia. Centers that qualify for this program must be in compliance with the standards in the policies and procedures for Adult Day Health Services manual and receive approval from the Department of Community Health and the Division of Aging Services (DHR). The Community Services Care Program is not the only program that can be used. There may be multiple other types of programs that can be used if the standards and approval focus on adult care.

Fire inspections, food inspections, Certificates of Occupancy, or business licenses do not meet the requirement for approval. The standards to receive certificates of this nature and the evaluation process do not cover services for adult day care, but focus only on one [1] area, i.e., fire safety, food safety, etc.

Centers that fail to meet the criteria listed above are not eligible for CACFP participation.

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Citation: 7 CFR Part 226 (e) and 226.19a (b) (1) and Bright from the Start CACFP Policy 07/33.

**Item 3:** Indicate if documentation is on file to support the center receiving funding from Medicaid Programs. If the center is not a recipient of Medicaid funds, answer “NA”.

**Item 4:** For centers that are funded by state governmental agencies, indicate if state employees operate the center. If the center is not state funded or operated, indicate “NA”. Adult centers are only eligible to participate in CACFP if licensed or approved by a federal, state, or local authority.

### **Civil Rights**

For guidance on civil rights requirements, see FNS Instruction 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities.

**Item 5:** Self-explanatory.

**Items 6-7:** The center must allow equal access to the program and not discriminate based on race, color, national origin, sex, age, or disability. Inquire with administrative staff as to admission criteria. Determine if admission criteria restrict any individual based on the protected classes. Determine during the review if staff are separating or treating participants differently based on the characteristics listed.

**Item 8:** FNS Instruction 113-1 (XII) (A) requires ethnic and racial data be collected and maintained at the "service delivery point"; therefore, this data must be kept on file at the center. Ensure that the center collects and maintains this data on file.

### **Participant Information**

**Item 9:** Each sponsoring organization must ensure that a sponsor notice is distributed to participant households which contains the information required at 7 CFR 226.16(b)(5). If the sponsor has given the sponsored center responsibility for distributing this information to households, determine the process for distributing the information. Determine if the procedure is adequate to inform households of the program and the center’s sponsorship.

**Item 10:** All facilities that participate on the CACFP have two [2] optional systems for charging for CACFP meals, both of which are tied to the Program’s free and reduced-price meal policy. These systems are “non pricing” and “pricing” programs. When an organization has a pricing program, households can only be charged for the number of meals that are actually served to the enrolled participant. This means that the organization must not charge a household for any meals that the participant was not present to receive. Therefore, the pricing organization must have a system in place to count, record, and charge the household for only those meals that are actually served to the enrolled participant. Lastly, determine the method for receiving payment of meals for reduced or paid participants. Does the method prevent identification of those participants that are paying a reduced price or those participants that are not paying for meals? There must be no overt identification of participant’s income level.

**Item 11:** Review enrollment records to determine if the age of each participant is documented.

**Item 12:** Per federal regulations and Bright from the Start policy #33, adult centers claiming meals for reimbursement must provide care for functionally impaired adults. There is no specific number of functionally impaired adults that must be in attendance, but the center must be open to provide care to this group of people. The definition of functionally impaired can be found in Bright from the Start CACFP policy #33 or in the regulations in the definition section. Institutions claiming meals for reimbursement served to adults, in care, must meet this criterion. Centers found to not meet this criterion must be cited by the monitor.

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**Item 13-14:** Determine if functionally impaired adults are age 18 years or older. Determine if the adults that are not functionally impaired are age 60 years or older.

**Item 15:** Determine if an Individual Plan of Care exists for each enrolled participant that meets the functionally impaired criterion. Adults who are not functionally impaired do not require an Individual Plan of Care. Centers that do not have completed Individual Plan of Care must be cited for not maintaining all required records for CACFP participation. An adequate corrective action response with supporting documentation is required.

**Item 16:** Determine if the center has records on file that indicate that adults reside in their own home or group living arrangements. Living arrangements for the participant must be documented in the adult's records. The living arrangements must indicate more than a physical address and should allow the sponsor to know whether the adult qualifies for participation in the CACFP. Refer to the Adult Care policy regarding living arrangements to determine what type of arrangements qualifies. If adult lives in group living arrangements, the adult must be primarily responsible for him/herself.

**Item 17:** Determine if center provides care for the adults less than 24 hours per day. To qualify for the CACFP, the adult care center must be providing care for adults for less than 24 hours a day. Those programs, which have responsibility for the adult on a 24-hour basis, are not eligible to participate in the CACFP. If the center has both an adult care center where care is provided for less than 24 hours and another program where care is provided for 24 hours, the adult care center can participate, but cannot include those adults that are in the care of the center on a 24-hour basis.

**Item 18:** Determine if the center has a comprehensive program that offers a variety of health, social and related support services to enrolled adults. For adults to qualify for the CACFP, it must provide a comprehensive care plan for each adult. The care must focus on those areas that are identified in the individual's care plan. Programs that are focused only on one [1] area such as vocational training are not eligible to participate. Refer to the Adult Care policy for more information.

**Item 19:** Determine if the center has multiple programs such as workshops, classes, programs, and events for which adults are not enrolled for a comprehensive care program. If the center has workshops, substance abuse programs, vocational training or social programs or events that can be attended by individuals that are not enrolled in the center for a comprehensive care program, and these adults are served meals, determine if there is a procedure in place that prevents ineligible adult meals from being claimed on the CACFP.

### **Claim for Reimbursement Verification**

**Item 20:** The sponsor must ensure that the center is claiming meals only for participants enrolled in the child care center. Enrollment is defined as any child with enrollment records on file who comes and receives a meal at least one [1] day during the month.

**Item 21:** 7 CFR 226.16(d)(4)(ii) requires the sponsoring organization to examine the meal counts recorded by the center for five [5] consecutive days during the current or prior claiming period. For each of these days, the reviewer must review the attendance records and enrollment records to determine if the number of meals being claimed are supported by attendance and enrollment.

Due to the claim payment system, sponsors must review records for a five-day period in the current month, or the sponsor may use the previous month only if the claim for reimbursement has not been submitted to DECAL. The reviewer should review attendance records to verify the number of participants that were present for each meal service claimed during the five-day period. Record the

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number of participants that were in attendance according to the attendance records on the Meal Count Reconciliation page of the review form.

To conduct the five-Day Reconciliation, do the following:

1. Evaluate the center's enrollment and attendance records to ensure they are current and accurate.
2. Determine the number of meals claimed by the facility based on the Weekly Menu and Food Service Records.
3. Compare the center's total meal counts to its licensed capacity, if applicable. The meal counts should not exceed the licensed capacity, except if care is provided in shifts.
4. Compare the center's total enrollment to daily attendance to ensure the number of participants in attendance does not exceed the number of participants enrolled. If attendance does exceed enrollment for any day or shift (if shift care is provided), determine the source of the error (e.g., inaccurate attendance records, missing enrollment forms etc.)
5. Determine whether the meal counts exceed the number of participants in attendance on any day or any shift.
6. Record the number of participants that were enrolled and in attendance according to the records in the appropriate meal category on the Meal Count Reconciliation Worksheet. (If attendance records are not substantially complete to verify meal counts, the facility will need to be cited for not maintaining attendance records as well.)

**Item 22:** Regulatory age limits are defined under the definition of "adults" in 7 CFR 226 and Bright from the Start CACFP policy 07/33. Determine whether participants are being correctly claimed. Adults that are determined to be functionally impaired must be 18 years of age or older. Adults that are not functionally impaired must be 60 years of age or older to claim their meals for reimbursement. If the center enrolls participants that are not functionally impaired and are under 60 years of age, determine the process the center has in place to exclude these individuals from the meal counts. Adults enrolled in the facility that are not functionally impaired and/or under the age of 60 are not eligible for the CACFP. All meals claimed and reimbursed for these participants must be reclaimed.

**Item 23:** When a center operates programs where individuals come to attend only a single workshop or event, but does not receive comprehensive care, those adults are not eligible to participate in the CACFP. Determine if the center has programs of this nature. If so, the center must have a process in place to ensure adults who do not qualify for the CACFP are not claimed for meal reimbursement. Review and determine if ineligible adults were claimed. All meals claimed and reimbursed for these participants must be reclaimed.

### **Recordkeeping**

**Item 24:** The Weekly Menu and Food Service Record must be used to record actual meals and the number served unless the center has received approval to use an alternate form. Review the Weekly Menu and Food Service Record for the current month (or the prior month if the review is being conducted at the beginning of the month) to ensure that the center is documenting this form daily. All records should be up to date to the day of the review.

**Item 25:** Does the center have a procedure in place to submit records to the sponsor in a timely manner according to the agreement with the center? If not, provide technical assistance to the center to ensure records are submitted so that claims for reimbursements are not delayed.

**Item 26:** Each sponsored center must maintain all records to support the claim for reimbursement per 226.10(d) for three [3] years after the date of submission of the final claim for reimbursement for that fiscal year. Determine where and if the center's procedures for maintaining these records are meeting the requirements.

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### **Fiscal Recordkeeping**

Sponsoring organizations are responsible for ensuring all meals served and claims submitted are compliant with all USDA regulations and State guidance and for ensuring sponsored centers meet all financial management requirements [2 CFR 200.302, FNS Instructions 796-2, Section FNS IX E].

**Items 27-29:** The center must use an accounting system or have adequate records with cost codes that track, identify and separate food service program expenses and revenues from expenses and revenues from other federal or non-federal programs operated by the organization. A separate CACFP bank account is not required by highly encouraged. Sponsored centers may use one [1] of three [3] options to track and capture all financial activities for the food program.

1. Manual tracking, this system must identify the source and application of funds.
2. A separate CACFP bank account.
3. A comingled account with a chart of accounts and general ledger (accounting code/program identifier).

**Items 30-31:** 7 CFR Section 226.15(e)(6) requires each institution to maintain copies of invoices, receipts, or other records to document: (i) administrative costs claimed by the institution; and (ii) operating costs claimed by the institution. DECAL CACFP policy 26 also requires sponsored facilities to maintain these records. If the center being reviewed is under an administrative sponsor, each center must be maintaining the Monthly Record of Cost Form (MROC) to document allowable cost, unless the center has received approval to use an alternate form. The reviewer for the administrative sponsor should review the MROC for any prior month for which costs have been claimed. Determine if the organization is documenting each charge to the CACFP and has all receipts to support the costs. If the center does not have receipts to support the costs charged to the CACFP, the center as part of the corrective action must be required to pay the food program account back in the amount of the costs that were not supported by receipts, invoices, or applicable supporting documentation. If the center being reviewed is under a center sponsor (affiliated), and the center is not required to maintain the receipts or the applicable forms, but this is the responsibility of the sponsor, note that this item is not applicable to the center by checking NA.

**Item 32:** FNS Instruction 796-2 Rev. 4 provides the guidance on allowable costs that can be paid with CACFP reimbursement. There are 39 cost categories listed in the FNS Instruction. The cost categories in the instruction do not always match the cost categories that are listed on the Monthly Record of Cost Form or in the Budget Details section of GA ATLAS. You may have to review the instruction or use the index in the back of the instruction to locate a cost. After each cost category, requirements may be listed concerning documentation to support that cost.

Some cost items must have prior or specific prior approval to claim the cost. These cost items can be found on the DECAL website. Typical costs such as food, labor, rent, and utilities do not require prior approval. However, if the center is claiming costs that require prior approval, and a budget was not submitted to the sponsor to approve, the center must be cited. Review the costs and determine whether only allowable costs are being claimed. If receipts show foods were charged that are not creditable food items, the costs cannot be claimed in the CACFP and the cost of these items would have to be repaid back to the center's food program account. The center does not have to repay money to DECAL, but corrective action must include crediting their food program account in the amount of the costs that were not allowable.

**Item 33:** For centers under a center sponsor (affiliated), this may not be applicable as it is the sponsor's responsibility to ensure that requirements are being met. If this is the case, check "NA" for this item. FNS Instruction 796-2 Rev. 4 provides the guidance as to proration of costs. Section

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VII A.3 I indicates that the cost must be properly allocated so that only the allowable share of the cost is assigned to the program. If an item is not used exclusively for the operation of the CACFP, then the item must be prorated according to the benefit the CACFP receives for an item. The item being charged will dictate how the item is to be prorated. The most common items that are prorated are utilities, rent, and labor. The FNS Instruction provides guidelines for prorating rental costs and utilities. Review to ensure the following guidelines are being met:

- The organization must have proration methods to support their charges to the CACFP.
- The proration method should show the formula that is used to derive the cost charged. Not having a documented proration method on file, and simply guessing, would not be sufficient.
- A proration method should be very specific. For example, if the organization is charging utilities for the kitchen, the proration method should show the square footage of the kitchen divided by the total square footage of the building. The actual amounts of the square footage should be listed. A proration method for utilities might look like this:
  - **100 sq. ft. kitchen / 1000 sq. ft. total building = .10 or 10%.**
  - Solely having 10% listed as the charge to CACFP is not acceptable without the supporting proration method on file.
- For proration methods that are only based on square footage and remain the same each month, a new written proration method is not required each month if one is on file.
- For those items that change each month, such as the amount of time someone might spend performing administrative duties, a proration method would need to be documented and on file for each month that costs are charged to the CACFP. The following should be conducted to ensure costs are being properly charged.
  - Review the items that are being charged to the CACFP. Items such as utilities, rent, or any item that would not be solely for the CACFP should trigger a review.
  - Review each proration method to determine that the proper formula is used.
  - If necessary, measure the area that is being charged to ensure that the proper square footage of the area was derived or ask for some documentation that shows the square footage.
  - Perform the mathematical equation to determine if the correct percentage is being charged.

**Item 34:** DECAL Policy 39 entitled Financial Recordkeeping in CACFP and SFSP and Policy Memo entitled [Labor Cost Documentation dated May 23, 2005](#) allows organizations to combine labor cost forms in certain situations. If the center is using the guidance in the policy memo, ensure compliance with the memo. Otherwise, both time and attendance and a time distribution report must be maintained and the guidance in FNS Instruction 796-2 Rev. 4 Section VIII I 23 c must be followed. FNS Instruction 796-2 Rev. 4 requires that time and attendance, time distribution reports, and compensation plans be on file for any labor costs charged to the CACFP. Section VIII I 23 c specifically lists the documentation requirements to charge labor costs.

All costs charged to the CACFP must be necessary, reasonable, and allowable. Labor costs charged to the CACFP are considered allowable costs, provided that all Program requirements are met. Costs can be made unallowable by the action or inaction of a center. For example, administrative labor costs may become unallowable because the organization failed to maintain the required documentation to support the costs charged to the Program.

### **Non-profit Food Service**

**Refer to the DECAL Policy Memo, *Monitoring Requirements - Monitoring Sponsored Centers Non-profit Food Service and Procurement Procedures to determine how often non-profit food service must be assessed.*** Sponsoring organizations must not impose findings and adverse actions in FY 2021 or FY 2022. Instead, DECAL strongly encourages technical assistance to be provided.

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**Item 35:** Sponsored centers are required to operate a non-profit food service principally for the benefit of enrolled participants and to maintain adequate records to support the sponsor's non-profit food service status. Sponsors must also ensure their centers are maintaining a non-profit food service. To do this, sponsors must effectively monitor and review its center's activities, including but not limited to, budgeting, accounting, costing standards, management of revenues, management of expenditures, management of property, procurement standards, and fiscal audits.

Determine the fund balance of the center's food service account/financial tracking from the most recent financial statement. Determine whether there are any outstanding invoices/payments that would further reduce the fund balance. If so, request documentation for these outstanding payments.

Obtain the average monthly expenses by averaging all the monthly expenses in the prior fiscal year (12 months). If the center did not operate the prior year, average the expenses for all operating months in the current fiscal year. Determine the average, then multiply by three [3] to obtain the fund balance that cannot be exceeded. **Complete the table on the checklist to complete the non-profit food service assessment.**

**Example:** A center's prior year's expenses totaled \$18,000 (total expenses for all 12 months). When divided by 12 months, one [1] month of average expenses totals \$1,500. Then, multiply \$1,500 by three [3]. The center's food service account balance should not exceed \$4,500.

If the institution's fund balance exceeds the three-month threshold, then a finding should be issued and request corrective action. Excess funds must be used to benefit program participants through improvement or expansion of the nonprofit food service program. **Note: Sponsoring organizations must not impose findings and adverse actions in FY 2021 or FY 2022. Instead, DECAL strongly encourages technical assistance to be provided.**

Below are acceptable ways to prevent and lower the excess funds balance with approval:

- Enhance equipment to improve meal preparation or service.
- Expand menus to include a larger variety of foods including the amount and variety of whole grains and fresh vegetables and fruits.
- Hire staff and/or charge allowable labor costs to the CACFP that were not previously being charged.
- Purchase supplies that allow nutrition education or physical fitness activities to be incorporated during meal time.

### **Procurement Procedures**

The Sponsor must ensure all centers (100%) develop and implement a procurement policy as stated in 2 CFR 318(a). The Sponsor must make this assessment annually, once during the federal fiscal year. If the sponsored centers will be executing formal procurement procedures, sponsors as well as the State Agency must review contracts, agreements and supporting documentation related to this process according to Program regulation. **Sponsoring organizations must not impose findings and adverse actions in FY 2021 or FY 2022. Instead, DECAL strongly encourages technical assistance to be provided.**

Only answer the applicable questions based on the center's written procurement procedures. Attach copies of the applicable procurement documents reviewed to the monitoring review form. (e.g., Monthly Record of Cost, invoices and receipts, procurement policy).

The sponsor may utilize DECAL's [\*Procurement Review Workbook\*](#) template in place of answering the following questions. Instructions and a procurement flowchart have been included on the workbook to assist with completing the procurement assessment. The workbook must be completed in its entirety and

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attached to the monitoring review form along with the procurement documents reviewed. The workbook is located on DECAL's website under the [Procurement](#) section and [CACFP Forms](#).

**Item 36:** Determine if the center has a written procurement procedure. If the center does not have any written procurement procedures, the sponsor must ensure the center completes the DECAL [Procurement and Purchasing Policy Template](#) or develop their own written procedures. DECAL recommends using the template.

**Item 37:** If the answer to question 28 was yes, determine if the center is using DECAL's [Procurement and Purchasing Policy Template](#) or written procurement procedures that include policy language noted in the policy memo, *Monitoring Requirements - Monitoring Sponsored Centers Non-profit Food Service and Procurement Procedures* and meet all federal and state requirements.

**Item 38:** If the center is using the DECAL [Procurement and Purchasing Policy Template](#), then select "N/A" for items a-d. If the center is not using DECAL's template, proceed to answer questions a-d. The written standards of conflict may be incorporated into the written procurement procedures. Centers may set standards for situations in which gratuities, favors, or anything of monetary value is an unsolicited item of nominal value.

### **Procurement Assessment**

**Refer to the DECAL Policy Memo, *Monitoring Requirements – Monitoring Sponsored Centers Non-profit Food Service and Procurement Procedures* to determine how often procurement must be assessed.** Sponsoring organizations must not impose findings and adverse actions in FY 2021 or FY 2022. Instead, DECAL strongly encourages technical assistance to be provided.

Only answer the applicable questions based on the centers written procurement procedures and the type of procurement conducted by the center. The sponsor may utilize DECAL's *Procurement Workbook Template* in place of answering the following questions. Instructions and a procurement flowchart have been included on the workbook to assist with completing the procurement assessment. The workbook must be completed in its entirety and attached to the monitoring review form along with the procurement documents reviewed.

The sponsor should review the center's procedures and what type of procurement was conducted. Then, gather all Monthly Record of Cost Forms (MROC) and determine if the center aggregated expenses or not. The sponsor may have to ask the center. Aggregate means calculated by the combination of many separate units or items; total. If the *Procurement Workbook* is not used to complete the procurement assessment, refer to the flow chart in the workbook to assist in completing the following procurement questions.

**Item 39:** Determine if the center used the *Suspension and Debarment Certification Form*. If "No," determine if one [1] of the three [3] USDA recommended methods was used to meet verification. USDA/FNS requires verification that persons with whom child nutrition program providers intend to do business have not been excluded or disqualified when entering a transaction covered by this section. The certification requirement applies equally for procurement transactions across all Child Nutrition and Food Distribution Programs. This verification may be done by:

- Checking the System for Award Management (SAM) or the Excluded Parties List System (EPLS); or
- Collecting a certification from\* that person; or
- Adding a clause or condition to the covered transaction with that person.



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\*If using the certification method to meet the verification requirements, the [\*Suspension and Debarment Certification Form AD1048\*](#) must be used and cannot be deviated from in any way.

**Item 40:** Determine if the center conducted and followed their procurement procedures for all purchases. If no procurement was conducted, then evaluate based on one [1] month of expenses (MROC) and assess based on micro purchase. Review each individual transaction made during the review month to ensure it did not exceed the micro purchase threshold of \$10,000 or less. If the center has a more stringent threshold, assess procurement using that threshold rather than the federal threshold level noted here. The center should be cited for not following their procurement procedures. **Note: Sponsoring organizations must not impose findings and adverse actions in FY 2021 or FY 2022. Instead, DECAL strongly encourages technical assistance to be provided.**

**Item 41:** Determine if the center is using the micro purchase procurement method. If “Yes,” proceed to answer questions a-c. If the center is not utilizing the micro purchase procurement method, select “N/A” for questions a-c. Review each individual transaction made during the review month to ensure it did not exceed the micro purchase threshold of \$10,000 or less. If the institution has a more stringent threshold, assess procurement using that threshold rather than the federal threshold level noted here. If any single transaction exceeded \$10,000 or the institution’s more stringent threshold, cite for not conducting small or formal procurement. To ensure compliance with the micro purchase procurement method, the sponsor should check each purchase and ensure multiple vendors were used. A minimum of two [2] vendors must be used. If only one [1] vendor was used, the monitor should request documentation to support why only one [1] vendor was used. If not, cite for not following micro-purchase requirements. **Note: Sponsoring organizations must not impose findings and adverse actions in FY 2021 or FY 2022. Instead, DECAL strongly encourages technical assistance to be provided.**

**Item 42:** Determine if the center is using the small purchase procurement method. If “Yes,” proceed to answer questions a-h. If the center is not utilizing the small purchase procurement method, select “N/A” for questions a-h. The sponsor should request and review the quotes on the [\*Small Purchase Documentation Form\*](#) to assess the questions. The small purchase threshold is greater than \$10,000, but less than \$250,000. Unless the center has a more stringent threshold.

**Item 43:** Determine if the center is using the formal procurement method. If “Yes,” proceed to answer questions a-b. If the center is not utilizing the formal purchase procurement method, select “N/A” for questions a-b. If the sponsored centers will be executing formal procurement procedures, sponsors as well as the State Agency must review contracts, agreements and supporting documentation related to this process according to Program regulation. The formal purchase threshold is greater than \$250,000. Unless the center has a more stringent threshold.

**Training**

**Item 44:** Sponsors are required to conduct training annually to key staff at each center and key staff must attend the training. DECAL has defined “key staff” at sponsored facilities as the individuals that are responsible for the operation of the CACFP at the center. Determine whether the person(s) responsible for the CACFP has received training. If this individual(s) is new, training must be provided to this person(s) by the sponsoring organization in some form. If the key staff has failed to attend the annual training after being given more than one option to attend, the center must be declared seriously deficient.

**Item 45:** Based on the training provided, determine if the center is implementing the topics that were discussed. If training topics included regulatory requirements that should have been implemented, the

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center must be cited for any failure to implement. If training topics included discretionary items, technical assistance should be provided.

### **Other Requirements**

**Item 46:** The sponsored center should be provided with program guidance concerning the CACFP and the sponsoring organizations procedures. Determine if this information is maintained at the center and available to the staff persons performing CACFP duties. If the answer is “No”, provide technical assistance to the center and/or provide the documents that should be on file for reference.

**Item 47:** In preparation for the current visit, the last review should be examined. Determine if any findings that were cited during the last review are corrected. Findings for the individual items not corrected must be made. Determine the severity and the frequency of the repeat findings. If an administrative sponsor, determine if the center should be declared seriously deficient and follow that procedure.

### **Food Handling/Sanitation and Food Storage**

**Items 48-65:** Determine if reasonable health, safety, and sanitary conditions exist in the center. Any serious health and/or safety and/or sanitation problem(s) should be discussed with the staff and brought to the attention of the appropriate local and/or State agencies (if applicable).

### **Observation of Meal Service**

Record the food items that were served under the food item column and the serving sizes. Indicate the meal type observed and the total number of participants present during meal service.

### **Meals Service Day of Review**

**Item 66:** Compare food items served on the day of review to the written menu prepared by the center. Menus should accurately reflect which food items were served to meet the meal pattern requirements. Menu substitutions should be appropriate and recorded on the menu. While this item should be not a finding, technical assistance should be provided.

**Item 67:** Observe and determine if the meal contains all the required components. For further guidance on meal pattern requirements, refer to 7 CFR 226.20 and the Food Crediting Guide.

**Item 68:** Observe and determine that the required components were prepared and served in sufficient quantities. The meal service may be pre-plated or family-style. For further guidance on family-style meal service in the Child and Adult Care Food Program, see FNS Instruction 783-9, Rev. 2, Family Style Meal Service in the Child and Adult Care Food Program.

**Item 69:** Observe the meal counts taken and recorded on the Weekly Menu and Food Service Record. An accurate system is based on an actual count of participants served and must consistently yield correct results. Examples of meal count methods that are not accurate are plate counts, use of enrollment/attendance data for meal count, other figures derived from enrollment and/or attendance data, etc. Counts must be taken at the time of service or directly after the service of the meal. Determine if an appropriate count is being taken.

**Item 70:** While adult staff persons may eat with enrolled participants, and these “non-program” adults must be recorded on the Weekly Menu and Food Service Record, they cannot be claimed for reimbursement. If the center serves “non-program” adults, determine if the organization is recording this.

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information on the Daily Menu and ensure these adults are not being claimed on the claim for reimbursement.

**Item 71:** Meals served to participants should incorporate a combination of colors, temperatures, textures, shapes, sizes, and flavors. If the answer to this item is “No,” provide technical assistance to encourage variety and enhance eye-appeal of meals. For further guidance for adult care centers, check out the information at the following website address: [http://www.nfsmi.org/Information/adult\\_care.htm](http://www.nfsmi.org/Information/adult_care.htm).

**Item 72:** A positive and pleasant meal environment promotes good eating habits for adults. If the answer to the question is “No,” provide technical assistance to encourage the center to create a more pleasant meal environment.

**Item 73:** Modifications in the meal pattern for medical or disability must be accompanied by a signed statement obtained from a recognized medical authority. For further guidance on menu substitutions, see FNS Instruction 783-2, Rev. 2 Meal Substitutions for Medical or Other Special Dietary Reasons.

**Item 74:** The regulations allow adult centers to utilize Offer versus Serve per 226.20(q). Ensure that the center is only allowing participants to decline those servings allowed by the regulations. If the center is implementing correctly, the meal remains creditable and reimbursable.

**Item 75:** Review the Weekly Menu and Food Service Records for the five [5] previous operating days. If there is a noticeable difference between the number of participants in care at the time of the meal service and the number of participants documented on the Weekly Menu and Food Service Records for the previous five [5] days, inquire with the Center Contact regarding the reason for the discrepancy. Attempt to confirm the explanation if possible (for example, reviewing documents to confirm a field trip if that explanation is provided).