



BRIGHT FROM THE START
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Memorandum

To: Sponsoring Organizations

From: Jackie Romain, Division Director

Date: March 18, 2005

Re: Monitoring Requirements

The purpose of this memorandum is to notify Child and Adult Care Food Program (CACFP) sponsoring organizations of a revision that has been made to the Monitoring Requirements Policy Memo that was originally dated September 26, 2002 and revised on July 2, 2003. (7 C.F.R § 226.16 (d)(4))

Sponsoring organizations are responsible for reviewing the food service operations of their sponsored facilities to assess compliance with meal patterns, licensing/approval status, attendance at training, meal counts, recordkeeping (menu and meal records), the annual updating and content of enrollment forms (if the facility is required to have enrollment forms), and other Program requirements. Reviews must be made at least three times each year at each facility (unless the sponsoring organization has elected to use a review averaging system- See Review Averaging Memo dated March 18, 2005). If a “new” facility, at least one of these three reviews must be made during the facility’s first four weeks of Program operation. “New” is defined as a facility that has never operated the CACFP under the auspices of the sponsoring organization or which has operated under the sponsoring organization, but has had a six month break in participation.

For all facility reviews, at least two of the three reviews must be unannounced and no more than six months may elapse between reviews. One of the two unannounced reviews must include the observation of a meal service. Reviews of centers that have outside-school-hours care centers or “at-risk” afterschool care programs must be made at least three times each year rather than six times per year as had been required in the past.

Required Number of Reviews

Per 7 CFR 226.16(d)(4)(iii) sponsoring organizations must review each facility three times a year, except as provided in 7 CFR 226.16(d)(4)(iv) which will be discussed later in this document. DECAL defines a “year” as the Federal Fiscal Year, which runs from October 1st to

September 30th. Pre-operational visits are not considered reviews and must not be included as such when calculating the number of reviews completed.

If each facility had no serious deficiencies that needed follow-up, an average review cycle would be conducted every 4 months, one review between Oct-Jan., one between Feb-May, and the last review between June-September.

Each facility, therefore, would be expected to have three reviews conducted except when the facility does not operate the CACFP for the entire federal fiscal year as described in the following section or when averaging.

Prorating the Review Visits Based on Effective Operating Date

Because some facilities do not participate the full year, it's not possible to visit that facility three times for the federal year; therefore, prorating the number of visits based on the start date of the organization is allowed.

The following guidelines must be followed:

- If the month that a facility is approved to submit claims falls between the months of Oct-Jan, the facility would need to be reviewed three times before the end of the fiscal year;
- If the month that a facility is approved to submit claims falls between the months of Feb-May, the center would need to be reviewed two times before the end of the fiscal year;
- If the month that a facility is approved to submit claims falls between the months of June-September, the facility would need to be reviewed one time before the end of the fiscal year.

For sponsored centers, the month that the center is approved to claim reimbursement for the CACFP is the beginning of the month in which the application for that site is complete. In the case of sponsored centers, there could be scenarios where the center's application was completed on the last day of the month, and the approval is "backdated" for the beginning of that month. While in reality it may not be possible to actually conduct a review in the 4-month period for which the approval month falls into, a review will still need to be conducted based on the approval date. The review will actually be conducted in the following 4-month period. Day Care Home Sponsors are required to submit provider applications by the 5th of the month in order for that home to be approved for participation in the same month. While the submission date for Day Care Home Sponsors is different, the same review guidelines would apply.

The following is an example pertaining to sponsored centers. An application is submitted to DECAL on Jan. 15th. All materials are complete Jan. 31st, and the facility is approved to operate effective January 2005. Because the actual completion of the application did not occur until Jan. 31st, it's unlikely that the sponsoring organization will be able to conduct a review for Oct-Jan. period. However, because the effective date of operation fell into this period, three reviews will be required for that facility for the federal fiscal year.

Meeting Minimum Review Requirements when Prorating Reviews

Because the regulations require at least two unannounced reviews for each facility, if a facility does not begin operation of the CACFP at the beginning of the year and less than three reviews will be made, then each review must be unannounced.

Because the regulations require that at least one unannounced review include the observation of a meal service, if a facility begins operation at a time in the year where only one review will be required, that review must be both unannounced and include the observation of a meal service.

DECAL Method for Determining the Minimum Reviews that must be Conducted

Each state is required to determine the minimum number of reviews that must be conducted by each sponsoring organization for the federal fiscal year when review averaging is used. The minimum number of reviews that must be completed by a sponsoring organization is obtained by adding together the maximum number of active and approved facilities for each trimester in the federal fiscal year.

Other Review Requirements

Sponsoring organizations must provide each sponsored facility with written notification of the right of the sponsoring organization, Bright from the Start: Georgia Department of Early Care and Learning (DECAL), and/or any of its agents to make announced or unannounced reviews of its operations during the facility's normal hours of operation, and must also notify sponsored facilities that anyone making such reviews must show photo identification that demonstrates that they are employees of one of these entities.

In addition to conducting reviews to assess a sponsored facility's compliance with Program regulations and policies, sponsoring organizations must also conduct reviews to assess whether the facility has corrected problems of a serious nature that were found during the previous review. If, in conducting a facility review, a sponsoring organization detects one or more serious deficiency, the next review of that facility must be unannounced, regardless of whether the previous reviews were unannounced.

Sponsoring organizations must also conduct a reconciliation of a sponsored facility's meal counts with enrollment and attendance records for a five-day period. 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, monitors must use attendance and/or enrollment records to determine the number of participants in care during each meal service and attempt to reconcile those numbers to the number of breakfasts, lunches, suppers, and/or snacks recorded in the facility's meal count for that day. Based on that comparison, monitors must determine whether the meal counts were accurate. If there is a discrepancy between the number of children enrolled or in attendance on the day of the review and prior meal counting patterns, the monitor must attempt to reconcile the difference and determine whether a reclaim is necessary.

Sponsors are also required to conduct household contacts in compliance with federal regulations and DECAL policies as part of their monitoring responsibilities (See Household Contact Memo dated March 18, 2005).

Sponsoring organizations are required to use the review form provided by the Department of Early Care and Learning unless the organization submits and receives approval to use an alternate form. Any forms submitted for alternate approval must indicate the requirements found at 7 CFR 226.16(d)(4) will be met during the review.

For questions concerning this memorandum, please contact your consultant.