

**INSTRUCTIONS FOR ADULT CENTER REVIEW FORM TO BE USED
BY ADMINISTRATIVE AND CENTER SPONSORS ONLY**

The adult center review form is designed to be used by administrative and center sponsors in reviewing their sponsored centers. Follow the instructions below when completing a review.

Box: Record date of review. Circle whether the visit is the first, second, or third of the fiscal year. Check whether the review is unannounced. 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, address of the center and the telephone number.

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.

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

For each question, check "Yes" if the center is meeting the requirement. Check "No" if the center is not meeting the requirement, or check NA if the item is not applicable. Items that are checked "No" will require a citation that should be listed on the findings page. Some items should be treated as technical assistance. Items that should be treated as technical assistance will be noted on the review form and in the instructions and may not require a corrective action. Technical assistance items should still be documented even though no finding is made.

Approval to Participate in CACFP

Items 1-2: 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 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 as long as 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 area, i.e. fire safety, food safety, etc.

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

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.

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.

Item 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 restricts 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 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 "nonpricing" 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.

If a pricing program, determine if the system is applied consistently across the program and that participants are only charged for meals consumed.

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 have to 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 Reviewer.

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 plans 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 plan of care. Programs that are focused

only on one 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 Daily 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 Daily Menus 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 on a daily basis. All records should be up to date to the day of the review.

Item 21: 7 CFR 226.16(d)(4)(ii) requires the sponsoring organization to examine the meal counts recorded by the center for five 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 hasn't 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 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 Daily 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 in order to verify meal counts, the facility will need to be cited for not maintaining attendance records as well.)

The sponsoring organization must have a system in place when completing the claim for reimbursement to ensure that only the number of meals that the reviewer has verified are claimed.

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: 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 25: Each sponsored center must maintain all records to support the claim for reimbursement per 226.10(d) for three 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.

Item 26: 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 Operating Costs and the Monthly Record of Administrative Costs form. The reviewer for the administrative sponsor should review both of these forms 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. Based on the amount of the reimbursement received, determine if the center has an excess balance of CACFP funds. If there is an excess balance of funds, the center must be cited and the center should provide corrective action as to how the excess funds will be used to enhance the food program. 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 service 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, 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 27: Both administrative sponsors and center sponsors should review this item. However, under a center sponsor, a center will not likely be cited as it is the sponsor’s responsibility to ensure that administrative costs for the sponsor and all its sponsored facilities do not exceed 15% and are correctly charged. While reviewing this information, if the center sponsor finds that administrative costs

were claimed in excess of 15% of the reimbursement, the sponsor should take action to correct this item. To correct this item, an adjustment may need to be made to the financial records to use CACFP funds to pay for allowable operating costs that were not previously claimed, or funds would need to be repaid to the CACFP account if there are no other allowable operating costs.

The administrative sponsor must ensure that their administrative costs and any administrative costs that the center pays with CACFP funds do not exceed 15% of the reimbursement for that center. If the sponsored center is performing any administrative duties, the center is allowed to claim these costs, and costs should be indicated on the “Budget for Sponsored Center” form. In order for the sponsor to be charging the maximum amount, 15% of the center’s reimbursement, the center should be performing the bare minimum of administrative duties, which should include the documentation of the Daily Menu and Food Service records and documentation of the Monthly Record of Operating Costs and Monthly Record of Administrative Costs Form along with ensuring that all receipts or applicable supporting documentation for expenses are available to support charges to the CACFP.

If administrative costs charged by the sponsored center do not coincide with the “Budget for Sponsored Center, the center should be provided technical assistance and corrective action will be required. If there were allowable operating costs that were not claimed by the sponsored center, the center can make an adjustment to the financial records to reassign the costs paid with CACFP reimbursement to allowable operating costs, or the administrative sponsor will need to adjust the amount deducted from the center.

Item 28: FNS Instruction 796-2 Rev. 4 provides guidance concerning allowable costs that can be paid with CACFP reimbursement. There are 39 cost categories listed in the FNS Instruction. Be aware the cost categories in the instruction do not always match the cost categories that are listed on the Monthly Record of Operating Costs or Administrative Costs forms or budgets. 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 in order to claim the cost. These cost items can be found on the Bright from the Start website. Typical costs such as food, labor, rent, 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 on 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 Bright from the Start, but corrective action must include crediting their food program account in the amount of the costs they claimed that were not allowable.

Item 29: For centers under a center sponsor, 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 for prorating costs. Section 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 the guidelines for prorating rental costs and utilities.

Review to ensure the following guidelines are being met:

- The organization must have prorating methods to support their charges to the CACFP.
- The prorating method should show the formula that is used to derive the cost charged. Not having a documented prorating method on file, and simply guessing would not be sufficient.
- A prorating method should be very specific. For example, if the organization is charging utilities for the kitchen, the prorating 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 prorating method for utilities might look like this:

$$\mathbf{100\ sq.\ ft.\ kitchen / 1000\ sq.\ ft.\ total\ building = .10\ or\ 10\%}.$$

Simply having 10% listed as the charge to CACFP is not acceptable without the supporting prorating method on file.

- For those prorating methods that are only based on square footage and that remain the same each month, it would not be necessary for the organization to “rewrite” the prorating method each month, as long as one is on file.
- For those items that change each month, such as the amount of time someone might spend performing administrative duties, a prorating method would need to be documented and on file for each month that costs are charged to the CACFP

Do the following 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 prorating 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 30: Bright from the Start 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 instructions 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.

TRAINING

Items 31: 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 32: 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 center must be cited for any failure to implement. If training topics included discretionary items, technical assistance should be provided.

OTHER REQUIREMENTS

Item 33: 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 34: 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 35-52: 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.

Item 53: 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 54: 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 55: 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 56: Observe the meal counts taken and recorded on the Daily 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 57: While adult staff persons may eat with enrolled participants, and these “non-program” adults must be recorded on the Daily 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

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

Item 58: 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

Item 59: 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 60: A signed statement obtained from a recognized medical authority must accompany modifications in the meal pattern for medical or special dietary reasons. For further guidance on menu substitutions, see FNS Instruction 783-2, Rev. 2 Meal Substitutions for Medical or Other Special Dietary Reasons.

Item 61: 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 62: Review the Daily Menu and Food Service Records for the five 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 Daily Menu and Food Service Records for the previous five 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).