CHILD CARE CENTER MONITORING REVIEW FORM INSTRUCTIONS
SPONSORING ORGANIZATIONS ONLY

The Child Care Center Monitoring Review Form is designed to be used by administrative (unaffiliated) and center sponsors (affiliated) in reviewing their sponsored child care centers. Use the review form for adults if not a child care center. 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.

Second Table
Sponsoring Organization Name: Enter the legal name of the sponsoring organization.

Name of Center: Enter the legal name and the name the center is doing business as. Enter the address of the center.

Licensed Capacity: Enter the capacity of the center at 35 sq. feet and if applicable the licensed capacity for the two extra hours at 25 sq. feet. For those facilities that are not licensed by Bright from the Start, enter NA for not applicable.

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

Number Present on Date of Visit: Enter the number of participants that were present at the time of the visit.

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

Program Type: Check the type of program operated by the center. If the center operates both child care and at-risk at the same location, check both programs.

Licensing/Approval
To qualify for the CACFP, child care centers must meet one [1] of the three [3] licensing or approval types.

Licensing Type:
If the center is licensed by Bright from the Start (DECAL) as a day care home or child care center, check the DECAL box. If the center is on a military installation and licensed by the Department of Defense, check the DOD box.

Approval Type: For Head Start programs that are not licensed in Georgia, check the Head Start Performance Standards. For other child care programs that are not licensed in Georgia, but have been approved by a federal, State, or local government entity, check this box. Indicate the authority (government entity or program) under which the center is approved to operate.

Alternate Licensure: Child care centers which are not licensed or approved by a federal, State, or local authority may use the CACFP Child Care standards to qualify. The center or the sponsor may elect to

complete the CACFP Child Care standards instrument. Centers that operate the At-Risk Afterschool Meals Component, Outside School Hours Care, and Emergency/Homeless Shelters **only** are not required by CACFP regulations to be licensed, approved, or meet alternate licensure requirements (compliance with CACFP child Care Standards) and should check the Exempt box.

While these types of centers are not required by CACFP regulations to be licensed, At-Risk Afterschool and Outside School Hours Care may be required to either be licensed or have an exemption from licensure in the State of Georgia. These types of programs must also comply with any State and local health and safety standards.

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

Third Table
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. Most items that are checked "No" will require a citation that should be listed on the Summary of Findings page, but some items should be treated as technical assistance (TA). Items that should be treated as technical assistance will be noted on the Child Care Center Monitoring 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.

License
Item 1: The number of participants that are present at the time of the review should be counted. Based on this number, determine whether the center is within their licensed capacity. Meals may not be claimed if the center is not within the licensed capacity per 7 CFR 226.17(b)(4) (child care centers & 226.19(b)(5) (outside school hours centers). The center contact should be made aware of this regulation and a method put in place to review the center's claim for reimbursement to ensure the meals are not claimed. If the center is not required to be licensed, or has an exemption, check N/A.

Item 2: To participate in the CACFP, federal, state, or local licensing or approval is required for all child care centers. Demonstration of approval by a federal, State, or local authority, the governing authority must have written standards of criteria by which the child care services are operated and approved. The written standards and approval must be focused on the various aspects of services that will be delivered to the children in care. Solely meeting compliance with one aspect of care, such as fire safety or food safety, does not meet the criteria for approval. Therefore, having a fire or food inspection alone would not meet the licensing or approval criteria for participation in the CACFP. This is not applicable to the At-Risk Afterschool Meals Component, Outside School Hours Care Centers, and Emergency Shelters (these centers must obtain a Certificate of Occupancy upon initially opening.

Item 3: Child Care Centers that are not licensed by a federal, State, or local authority must comply with CACFP Child Care Standards and have a current health/sanitation permit or satisfactory report of inspection conducted by local authorities within the past 12 months and a current Certificate of Occupancy. Centers that are using CACFP Child Care Standards to qualify must use the Bright from the Start Child and Adult Care Food Program Child Care Standards Form to conduct an evaluation of their center to assess compliance with the standards. Centers qualifying under the CACFP Child Care Standards must conduct an evaluation at least once a year and ensure compliance to continue participation. Centers must certify compliance with and maintain the CACFP Child Care Standards Form at the center. This is not applicable to the At-Risk Afterschool Meals Component, Outside School Hours Care Centers, and Emergency Shelters (these centers must obtain a Certificate of Occupancy upon initially opening.

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Civil Rights

For guidance on civil rights requirements, see FNS Instruction 113-4, Civil Rights Compliance and Enforcement in the Child Care Food Program.

Item 4: Self-explanatory.

Items 5-6: The center must allow equal access to the program and not discriminate based on race, color, national origin, sex, age, or disability, and reprisal or retaliation for prior civil rights activities. Inquire with administrative staff as to admission criteria. Determine if the 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 7: 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 8: 7 CFR 226.15(n) requires that participant households be provided with yearly updates regarding income eligibility standards and program facts for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). WIC information must be distributed at the time of enrollment to households whose children are enrolled for participation in child care programs. Posting the information does not fulfill the obligation. Ask the center contact how this information is distributed and verify the procedure while conducting the review if possible. This is not applicable to At-Risk, or Outside School Hours Care.

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 in 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.

Additionally, programs may not charge some participants a separate fee while not charging others in the facility a separate fee for meals. For example, many organizations that have the Georgia Pre-K program are allowed by Pre-K guidelines to charge the Pre-K students a separate charge for meals. However, if the center participates in the CACFP, the center cannot treat and charge differently for different groups within the center. The center must choose to be either a pricing or non-pricing program and apply this system across the entire organization. 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.

Claim for Reimbursement Verification

Item 11: 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 12: 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. 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. For each of these days, the reviewer must review the enrollment and attendance on file to determine the number of participants that are enrolled and in attendance. Outside School Hours Care, At-Risk, and Emergency Shelters are not required to have annually updated enrollment records. Therefore, if one of these types of centers is being reviewed, the reviewer will only review attendance records.

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. 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 children in attendance does not exceed the number of children 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.

Based on the attendance/enrollment records, the reviewer should determine if the center documented meals more than the attendance/enrollment records. If enrollment records are reviewed and it is found that a child is not noted as normally being present at a certain time, but the child is marked on the attendance record, the reviewer should place this child or children with similar situations in the sample of household contacts to verify enrollment. Additionally, if a substantial number of meals were documented on the Weekly Menu and Food Service Record that could not be verified by attendance/enrollment records, the sponsoring organization (SO) must take the appropriate steps to make household contacts per DECAL's Household Contact Memo. If upon making household contacts, the SO has reason to believe that the sponsored child care center intended to file a false or fraudulent claim, the SO should take the appropriate steps to conduct follow-up reviews or declare the center seriously deficient. Keep in mind household contacts are only applicable to child care centers including Head Starts. The sponsoring organization must also have a system in place when completing the claim for reimbursement to ensure that only the number of meals that the reviewer has verified through attendance/enrollment records are claimed.

Item 13: Regulatory age limits are defined under the definition of "children" in 7 CFR 226. Determine based on the type of program, whether participants are being correctly claimed. When children turn 13 years, they can no longer be claimed in the CACFP unless it is a migrant program or there is documented disability of any child of any age if most of the children in care are under 18 years of age. Children participating in the At-Risk Afterschool Meals Component may be up to 8 years of age. Children that turn 19 years in the At-Risk Afterschool Meals Component may be claimed throughout the end of the school year.

At-Risk Afterschool Meals Component
Item 14: When reviewing the at-risk program, review and record the activities that are taking place. The center must be providing enrichment or educational activities during the afterschool program to be eligible for this program. This does not mean that during the afterschool program, free time (playground or videos) is not allowed. However, free time should not be most of the program agenda. If at the time of the review, educational or enrichment activities are not being conducted, review the agenda that is available for the program. There should be educational, or enrichment activities listed. While there is a variety of enrichment or educational activities that meet this requirement, the staff at the center must be actively involved in providing these activities. Solely having the students complete their homework while at the program with no involvement from the staff would not qualify the center under this program. The center should be cited if not providing enrichment or educational activities and ensure that staff are trained to provide these activities. Centers that choose to create an agenda should submit the agenda as part of the corrective action. At the next review, the reviewer should observe the activities that are being conducted. If the center is still not providing these educational or enrichment activities, determine if the center should be designated as seriously deficient for lack of compliance. (Administrative Sponsors only)

Recordkeeping
Item 15: This item is applicable to child care centers and Head Start centers. Mark "NA' for all other sponsored centers. Determine whether each child enrolled and being claimed for the review month has a complete and current enrollment form. In Georgia, the enrollment information can be documented on the Income Eligibility Statement (IES).

For those centers that choose not to use the DECAL Income Eligibility Statement for all participants, enrollment information must be on file for these children at the center. If the center uses the IES for all participants, the sponsor should be able to make this determination without reviewing information at the center. If the center does not use the IES form for all participants, review the enrollment information for those participants to determine if the guidelines, found at 7 CFR 226.15(e)(2), for enrollment are being met. Enrollment information must be updated and signed by the parent annually.

Item 16: 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 17: 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 18: 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.

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 19-21: 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 captures 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 22-23: 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 24: 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 25: 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 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 26: 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.

Item 27: 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 centers 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 centers 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:
- o   Enhance equipment to improve meal preparation or service.
- o   Expand menus to include a larger variety of foods including the amount and variety of whole grains and fresh vegetables and fruits.
- o   Hire staff and/or charge allowable labor costs to the CACFP that were not previously being charged.
- o   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 centers 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 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 28: 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 29: 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 30: 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.

Items 31: 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.

*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 32: 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 33: 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 34: 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 35: 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.

<u>Training</u>
Items 37: 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 38: Based on the training provided, determine if the center is implementing the topics that were discussed. If training topics included regulatory requirements that must be 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 39: 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 40: 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 41-58: 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
Indicate the meal type observed and the total number of participants present (infants, 1-12 years and at-risk). Record the food items that were served under the food item column and the serving sizes under the applicable age range. In the lower table, infant meals should be recorded for all centers that enroll infants.

Meals Service Day of Review
Item 59: 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 not be a finding, technical assistance should be provided.

Item 60: 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 61: The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, requires that milk served in the CACFP be consistent with the most recent version of the Dietary Guidelines for Americans. The 2017 Updated Meal Pattern Requirements recommend that children two-five years of age consume fat-free (skim) or low fat (1%) fluid milk; and unflavored low-fat, unflavored fat-free, or flavored fat-free milk or flavored low-fat milk be served to children 6 years old and older. Unflavored whole milk must be served to 1-year old children. **Whole milk and reduced fat (2%) milk may not be served to participants over two years of age.** Additionally, parents and guardians may now request in writing nondairy substitution that meets the nutritional standards for fortification of calcium, protein, vitamin A, vitamin D, and other nutrients found in cow's milk without providing a medical statement. Such substitution is at the option and the expense of the center. The requirement for participants who

have a medical disability and who submit a medical statement signed by a licensed physician remains unchanged.

Item 62: 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 63: Observe the meal counts taken and recorded on the Weekly Menu and Food Service Record Forms. 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 64: 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 Forms, they cannot be claimed for reimbursement. If the center serves "non-program" adults, determine if the organization is recording this information on the Weekly Menu and Food Service Forms and ensure these adults are not being claimed on the claim for reimbursement.

Item 65: Meals served to participants should incorporate a combination of colors, temperatures, textures, shapes, sizes, and flavors. If the answer to this item is "N," provide technical assistance to encourage a variety and enhance eye-appeal of meals. For further guidance for child care centers, check out the information at the following website address: http://www.fns.usda.gov/cnd/Care/Publications/tools.htm

Item 66: A positive and pleasant meal environment promotes good eating habits for children. If the answer to the question is "No," provide technical assistance to encourage the center to create a more pleasant meal environment.

Item 67: All child care centers that enroll infants must offer formula to infant households that are enrolled participants. DECAL Policy Memo entitled "Infant Meals" dated July 7, 2005, recommends that an affidavit be on file to support the parent's choice to supply formula. If the affidavit is not used, some other method of documenting compliance must be on file. Review the procedures for offering formula and/or review documentation to support the center's procedure.

Item 68: Infant meals consisting solely of food provided by parents are NOT reimbursable unless the pattern only includes formula/breast milk for that meal (per USDA policy memo 226.20-28 and DECAL Memo dated 7-7-05). 7 CFR 226.20 (b)(2) requires centers and day care homes to offer at least one type of iron-fortified infant formula. Updated CACFP USDA policy memo CACFP 02-2018 on Feeding Infants and Meal Pattern Requirements requires the center or day care home to supply all the other required food components for the meal to be reimbursable when a parent or guardian chooses to provide breastmilk or a credible infant formula when their infant is consuming solid foods.

Item 69: 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 70: The Healthy, Hunger-Free Kids Act of 2010 (the Act), Public Law 111-296, requires child care centers, family day care homes, at-risk afterschool programs and emergency shelters participating in

CACFP to make drinking water available to children, as nutritionally appropriate. Throughout the day, including at meal times, water should be made available to children to drink upon their request, but does not have to be available for children to self-serve. While drinking water must be made available to children during meal times, it is not part of the reimbursable meal and may not be served in lieu of fluid milk. Water may not be served in lieu of liquid milk or fluid item for snack, however if two [2] non-fluid items are served for snack water should be offered in addition to those items. Please note, that the purchase of water will continue to be an unallowable cost, unless in extreme circumstances where safe water is not readily available in a facility.

Item 71: Review the Weekly Menu and Food Service Record Forms for the five [5] previous operating days. If there is a difference between the number of children in care at the time of the meal service and the number of children documented on the Weekly Menu and Food Service Record Forms 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. If the Center Contact cannot provide a valid and reasonable explanation for the discrepancy and the difference is 20% or more, household contacts will be required. Review the memo for conducting Household Contact Procedures. Household contacts will determine, when applicable, if a disallowance will be implemented. If the Center Contact/center staff can provide a valid and reasonable explanation, document the explanation.