POLICY ALERT

Date: February 3, 2006
Reference: # CACFP ADC 2006-4
To: Child and Adult Care Food Program-Adult Day Care (CACFP-ADC) Contractors
Subject: New Training Requirements for Sponsoring Organizations
Effective Date: Immediately

Purpose
This Policy Alert REPLACES Policy Alert CACFP ADC 2005-5, this alert:
• Adds “Claims Review Procedure” to the list of minimum training topics.
• Removes “Review Procedures” from the list of minimum training topics.
• Adds training requirements for the Sponsoring Organizations staff, i.e. monitors.
• Clarifies the training responsibilities for the Sponsoring Organization and center.

Definitions
Annually – once during each program year.
Center – a sponsored affiliated or unaffiliated adult day care center.
Key Activities – essential CACFP activities, as defined by Special Nutrition Programs (SNP), performed to meet the requirements of the Program.
New Center – a center that has not begun participation in the Program, but has signed with a sponsoring organization.
Sponsoring Organization (SO) –
1. A public or private nonprofit organization that is entirely responsible for the food service in adult day care centers that are legally distinct entities from the sponsoring organization; or
2. A for-profit organization that is entirely responsible for the food service in adult day care centers that are part of the same legal entity as the sponsoring organization.

Implementation
PY 2006
• Implement the new training requirements for all participating centers and SO staff October 1, 2005 and thereafter.

continued

This Policy Remains in Effect Until Further Notice
### Procedures

| Training Frequency | A new center must receive training prior to the centers participation in the Program and annually thereafter.  
|                   | A participating center must attend training annually.  
|                   | A new employee of the SO or center, who perform key activities, must receive training prior to beginning key activities.  
|                   | A current employee of the SO must receive training annually. |

### Key Activities

SO and Center staff that perform a key activity must attend training annually. Listed below are the minimum key activities identified by SNP. Contractors may include additional activities to meet their training needs.

- **Budget**
- **Procurement**
- **Enrollment**
- **Eligibility Determination**
- **Attendance Records**
- **Meal Preparation**
- **Meal Service**
- **Meal Counting**
- **Claim Preparation**
- **Monitoring**
- **Civil Rights**
- **Training**

### Training Content

New center and SO Staff - At a minimum, trainings must include all the following areas and subtopics for each new center and SO staff.

#### Program Meal Pattern

- Adult meal pattern
- Serving size
- Creditable foods
- Meal service styles
- Accommodating special needs diets
- Menu planning

#### Meal Counts

- Point of service count
- Daily, weekly, and monthly counts

#### Claims Submission

- Due date
- Late claims
- Amended claims

#### Claims Review Procedures

- Review elements
- Adverse action
- Appeal rights

...continued
Training Content continued

Procedures continued

Record Keeping Requirements
- Daily, weekly, monthly forms
- Application for meals in adult day care centers
- Meal production records
- Financial records
- Record retention
- Purchased vended meals

Reimbursement System
- Blended rates
- Administrative fee
- Payment schedule

Civil Rights
Participating centers and current SO staff - At a minimum, trainings must include the following areas for participating centers and SO staff.
- Program Meal Pattern
- Meal Counts
- Claims Submission
- Claims Review Procedures
- Recordkeeping Requirements
- Reimbursement System
- Civil Rights

Training Format
You must plan trainings that are appropriate to the experience level and duties of the SO and center staff. Experienced and inexperienced SO and center staff should not get the same training year after year. Repetition of some information may be necessary to ensure continued Program compliance.

Although all topics must be included in the annual training, you may provide more information on some topics than others. Your training should always address areas you have identified where SO staff and centers have problems.

There is no requirement for the amount of time spent on training. Therefore, you may only need a short review on some topics, while other topics require a longer period of time.

continued
Training Format continued

Training may be conducted in a variety of ways to meet the needs of the SO staff and centers. Sponsors may use classroom style, on-site, distance learning (with the exceptions listed below), or other innovative training techniques, provided the training is properly documented and the training accomplishes the regulatory requirements for training content and frequency.

However, sponsors may not fulfill the training requirements by providing a training video to SO and center staff and requiring them to certify that they watched it. Training on video, CD-ROMS, web-based training, and/or other independent learning approaches are only permitted to fulfill the requirement if there are means to verify that each trainee has actually received the training, i.e., pre- and post-tests, activities, exercises, etc. SO staff and centers may use electronic signatures to verify that they have completed electronic training.

Training Documentation

You must maintain documentation of all training sessions that include the following:
- Date of training,
- Location of training,
- Training topics,
- Names of participants, and
- Written or electronic signature of the participants.

When a center completes a required training course, you must present the center with written documentation acknowledging their completion of the training. The document must include:
- The name of the center;
- The title of the training;
- The date the training was completed;
- The name of your sponsoring organization;
- The name of the trainer who provided the training (if applicable); and
- The written or electronic signature of an authorized representative of your organization.

SO Training Responsibilities for Center Staff

During the program year center staff may change. Any new staff hired by a center is required to be trained on the areas and subtopics outlined in this Policy Alert. It is the SOs responsibility to ensure new center employees who will be performing key activities receive training prior to the beginning of CACFP functions. The SO can develop a method to ensure this training is performed and compliance with the requirement for the staff member to participate is met. This can include the SO providing the training as needed or developing a training plan with the center for a trained center employee to provide the training. All documentation requirements would apply in either situation and the SO would be responsible for verifying compliance with the training requirements during their review of the center.
Adverse Action

Sponsors that do not conduct the required training may be placed in the serious deficiency process. Not providing proper training is a serious deficiency listed in Policy Alert CACFP ADC 2003-6, Serious Deficiency Process for Participating Contractors. Please refer to the policy alert for detailed information on the serious deficiency process.

The sponsor must follow its own procedures for handling a facility’s failure to receive annual training.

Authority

Child and Adult Care Food Program: Improving Management and Program Integrity Rules.

Contact

If you have any questions regarding this Policy Alert please contact your Area Program Office.