POLICY ALERT

Date: August 8, 2006           Reference: # CACFP CCC 2006-22
To: Child and Adult Care Food Program-Child Care Centers (CACFP-CCC) Contractors
Subject: New Training Requirements for Sponsoring Organizations
Effective Date: Immediately

Purpose
This Policy Alert RESCINDS Policy Alert CACFP CCC 2006-5, New Training Requirements for Sponsoring Organizations, this alert:
• Revises the definition of Sponsoring Organization (SO).
• 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 Organization’s staff, i.e., monitors.
• Clarifies the training responsibilities for the Sponsoring Organization and facility.

Definitions
Annually—once during each program year.
Facility—a sponsored affiliated or unaffiliated child day care center.
Key Activities—essential CACFP activities, as defined by Special Nutrition Programs (SNP), performed to meet the requirements of the Program.
New Facility—a facility that has not begun participation in the Program, but has signed with a Sponsoring Organization.
Sponsoring Organization—a public or nonprofit private organization which is entirely responsible for the administration of the food program in:
  a) One or more day care homes.
  b) A child care center, outside-school-hours care center, at-risk afterschool snack program care center, or adult day care center, which is a legally distinct entity from the Sponsoring Organization.
  c) Two or more child care centers, outside-school-hours care centers, at-risk afterschool snack program care centers, or adult day care centers.
  d) Any combination of child care centers, adult day care centers, day care homes, outside-school-hours care centers, and at-risk afterschool snack program care centers.
The term “Sponsoring Organization” also includes a for-profit center that is entirely responsible for administration of the Program in any combination of two or more child care centers, outside-school-hours care centers, at-risk afterschool snack program care centers, or adult day care centers provided that the centers are part of the same legal entity as the Sponsoring Organization.

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Implementation

**PY 2006**

- Implement the new training requirements for all participating facilities and SO staff October 1, 2005 and thereafter.

**Procedures**

**Training Frequency**

- A new facility must receive training *prior* to the facility’s participation in the Program and annually thereafter.
- A participating facility must attend training annually.
- A new employee of the SO or facility, who performs key activities, must receive training *prior* to beginning key activities.
- A current employee of the SO must receive training annually.

**Key Activities**

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

- **Program Meal Pattern**
  - Infant and child meal pattern
  - Serving sizes for age groups
  - Creditable foods
  - Meal service styles
  - Accommodating special needs diets
  - Menu planning

- **Meal Counts**
  - Point of service count
  - Daily, weekly, and monthly counts

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<th>Procedures continued</th>
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| **Claims Submission** | o Due date  
|                     | o Late claims  
|                     | o Amended claims  |
| **Claims Review Procedures** | o Review elements  
|                     | o Adverse action  
|                     | o Appeal rights  |
| **Record Keeping Requirements** | o Daily, weekly, monthly forms  
|                     | o Child Nutrition Program Application  
|                     | o Annual enrollment information  
|                     | o Meal production records  
|                     | o Financial records  
|                     | o Record retention  
|                     | o Attendance records  
|                     | o Purchase vended meals  |
| **Reimbursement System** | o Blended rates  
|                     | o Administrative fee  
|                     | o Payment schedule  |
| **Civil Rights** |  |

**Participating Facilities and Current SO Staff** - At a minimum, trainings must include the following areas for *participating* facilities 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 facility staff. Experienced and inexperienced SO and facility 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 topic than others. Your training should always address areas you have identified where SO staff and facilities 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.

Training may be conducted in a variety of ways to meet the needs of the SO staff and facilities. 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 staff and facility 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 facilities may use electronic signatures to verify that they have completed electronic training.

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 facility completes a required training course, you must present the facility with written documentation acknowledging their completion of the training. The document must include:
- Name of the facility;
- Title of the training;
- Date the training was completed;
- Name of your Sponsoring Organization;
- Name of the trainer (if applicable); and
- Written or electronic signature of an authorized representative of your Sponsoring Organization.
SO Training Responsibilities For Facility Staff

During the program year facility staff may change. Any new staff hired by a facility is required to be trained on the areas and subtopics outlined in this Policy Alert. It is the SO’s responsibility to ensure new facility 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 facility for a trained facility 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 facility.

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-CCC 2003-9, 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 please contact your Area Program Office.