Date: May 18, 2005  
Reference: # CACFP CCC 2005-9  
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 notifies sponsoring organizations of the new mandatory training requirements for new and participating facilities.

Definitions
Annually – once during each program year.

Facility – a sponsored affiliated or unaffiliated child care center, at-risk site, and/or outside-school-hours care center.

Key Activities – essential activities, defined by Special Nutrition Programs (SNP), performed in the CACFP necessary 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 –
1. A public or private nonprofit organization that is entirely responsible for the food service in any combination of child care centers, outside-school-hours care centers, or at-risk programs that are legally distinct entities from the sponsoring organization; or
2. A for-profit organization that is entirely responsible for the food service in any combination of child care centers, outside-school-hours care centers, or at-risk programs that are part of the same legal entity as the sponsoring organization.

Implementation

PY 2005
- Immediately implement and thereafter, the new training requirements for new facilities.
- Implement immediately the new training requirements for participating facilities that have not received annual training in PY 2005.

PY 2006
- Implement the new training requirements for all participating facilities October 1, 2005 and thereafter.

continued

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

#### Key Activities
Facility 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 facility - At a minimum, trainings must include all the following areas and subtopics for each new facility.

**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

**Claims Submission**
- Due date
- Late claims
- Amended claims

**Review Procedures**
- Frequency
- Review elements
- Adverse action
- Appeal rights

---

continued
Training Content continued

**Record Keeping Requirements**
- Daily, weekly, monthly forms
- Child Nutrition Program Application
- Annual enrollment information
- Meal production records
- Financial records
- Record retention
- Attendance records
- Purchase vended meals

**Reimbursement System**
- Blended rate
- Administrative fee
- Payment schedule

**Civil Rights**

Participating facilities - At a minimum, trainings must include the following areas for participating facilities.

- Program Meal Pattern
- Meal Counts
- Claims Submission
- 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 facilities staff. Experienced and inexperienced facilities 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 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.

continued
Training may be conducted in a variety of ways to meet the needs of the 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 facility 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. 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.

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 regarding this Policy Alert please contact your Area Program Office.