POLICY ALERT

Date: October 1, 2008                Reference: # CACFP CCC 2009-01
To: Child and Adult Care Food Program-Child Care Centers (CACFP-CCC) Contractors
Subject: Obtaining Copies of Contractor’s Records
Effective Date: October 1, 2008

APPLIES TO INDEPENDENT CHILD CARE CENTERS ONLY

Purpose

This Policy Alert ACCOMPANIES Item 5210, Examination of Records in the CACFP-CCC Handbook

Implementation

October 1, 2008

Background

When preparing for an administrative review, you must make available all records pertaining to the CACFP. During administrative reviews of the CACFP, Texas Department of Agriculture (TDA) Food and Nutrition Division (FND) staff must review these documents and obtain copies of documents needed. To minimize the amount of time spent at your office/center and the disruption caused by the TDA onsite, TDA is implementing a pilot project that will involve independent child care centers only.

Procedure

Beginning with administrative reviews scheduled in Program Year 2009 (October 1, 2008 – September 30, 2009) contractors will be required to copy certain records and submit them to their Food and Nutrition Field Operations Office two weeks prior to an announced administrative review. Four weeks prior to the announced administrative review, your Field Operations Office will mail you an appointment letter stating which records must be available during the onsite review as well as which records will need to be copied and submitted prior to the onsite review.

It will still be necessary to have available at the onsite review the originals of the copied documents as well as all of the documents identified in attachments 1A and 1B sent with your appointment letter

On-site Program Records

During an administrative review, the following records must be available on-site for inspection by TDA staff:

- Originals of all copied documents (as listed on Attachment 1B).
- Validation - Form H4528, Title XX/ Free-Reduced Price Certification-Child Care Centers

This Policy Remains in Effect Until Further Notice
Procedure continued

- For-profit contractors only: Form H4528 for the test month with documentation to show that 25% or more of your enrolled children are Title XX or eligible for free or reduced-price meals.

- Program Expenses
  - Written Compensation Policy for positions paid in whole or in part with food service funds
  - Time Distribution records for positions paid in whole or in part with food services funds (positions that are noted in your CACFP budget).
  - Records verifying payments to IRS (Form 941) for employee withholdings and social security for employees paid in whole or in part with food service funds.
  - Cost Allocation Records – All itemized receipts, invoices, billings, payroll records and any prorated expenses declared in your approved CACFP budget for the test month. You must be prepared to provide additional months of records if requested.
  - All cash register tapes, invoices, billings, ledgers, delivery slips, receipts, inventory records, with costs noted to support purchases and acquisition of foods on the Production Records.

- Non-profit Food Service Determination and Program Income
  - Records of Program Income – includes prices charged to program and non-program adults (not participants) for meals served, if applicable.
  - Records of interest earned on reimbursement, if applicable.

- Training
  - Training Records indicating the date(s), topics, name and signature of attendees, location of training, and person conducting training for the last 12 month period.
  - Documentation that new staff with CACFP duties are trained on the CACFP duties prior to assuming those duties.
  - Documentation to support that Civil Rights training was given in the past 12 months to all of your staff with CACFP duties.

- Monitoring
  - Form(s) H1529, Food Service Management Company/Vendor Monitor Review, that you have had contracts with in the last 12 months, if applicable.

- Procurement
  - Copy of your written procurement procedures.
  - Copy of your written Code of Standards of Conduct.
  - A copy of bid specification package(s) that was given to all potential bidder(s); copy of bid selection and evaluation process and any other documentation to support purchasing decisions, if applicable
  - Copy(s) of final vended contracts for all services and products received, including contracts with dietitians, if applicable.
  - Documentation to support that Form(s) H2048 and H2049 have been completed on all subcontractor(s), if applicable.
• Administrative Responsibilities
  o An organizational chart that includes the names and functions for all current employees, board members, officers, agents, consultants and volunteers involved in any aspect of the CACFP.
  o Alternate Form(s) and their approval(s) from TDA, if applicable.
  o Audit reports and outstanding audit issues, if applicable.
  o Documentation to support field trip activities if they are being claimed for food program purposes during the test month.
  o Documentation showing distribution of WIC information, as required by Agricultural Risk Protection Act, to parents/guardians of participants.
  o Documentation showing compliance with requirement to distribute the Parental Notification flier to each household with children enrolled for care in the center.

• Civil Rights
  o Copies of brochures or materials developed for the public regarding your participating in the CACFP and non-discrimination policy.
  o Documentation of potential beneficiaries by racial/ethnic categories.
  o Name of the Section 504 Coordinator – (for organizations with 15 or more employees).
  o Copy of your Grievance Procedure.
  o Copy of your Complaint Procedure.
  o Display of the required USDA Civil Rights Poster. This poster is required at the main office and site if they are in different locations. The poster must be displayed in a prominent area for the general public to see.

• Site Eligibility
  o Copy of license or valid certification to care for children.

• Meal Service
  o CN Label documentation, if applicable.
  o Product Analysis information, if applicable.
  o Special Diet documentation, if applicable.

• Sanitation and Storage
  o Health Inspection Documentation

Copies of Program Records to be submitted two weeks prior to announced review

Note: Costs incurred from making copies for the administrative review are considered allowable administrative costs, if they are in your approved budget.

Two weeks prior to the on-site administrative review, legible copies of the following records must be mailed or delivered to your Field Operations Office:

• Enrollment
  o An alphabetized list of names of children enrolled in the center during the test month.
Procedure
Continued

- CACFP enrollment forms or other forms that are used to capture all the required CACFP enrollment information alphabetized for all children enrolled during the test month.
- Sign in and sign out sheets for the test month.

- Eligibility Determination – Form H1531, Child Nutrition Program Application
  - Form(s) H1531 or H1531-S for children claimed in the test month, prepared in the following manner:
    1. Copy only the Form H1531’s for the children enrolled in the test month.
    2. Copy Form H1531’s front and back.
    3. Put the Form H1531’s in alphabetical order for comparison to enrollment and attendance records.

  **Note:** Form H1531 is not required for children who only attend the At Risk Afterschool Snack Program.

- Documentation of eligibility for free meals due to participation in a Head Start or Even Start Program for all children claimed in the free category in the test month on the basis of Head Start or Even Start participation.

- Attendance and Meal Count
  - Form(s) H1535, Daily Meal Count and Attendance Records (or approved alternate) for the test month.

- Meal Production Records
  - Form(s) H1530/H1530-A/H1530-B, Daily Meal Production Records for the test month.

  **Note:** Be prepared to provide additional months of data if requested.

If copies of the above records are not delivered to the Field Operations Office, the Field Operations Monitor will still conduct the Administrative Review and obtain copies of records at that time.

Adverse Action

Failure to provide copies of the above records to the Field Operations Office prior to the announced administrative review could result in a finding.

Authority

Texas Department of Agriculture (TDA) Food and Nutrition Division (FND)

Contact

If you have any questions please contact your Food and Nutrition Field Operations Office.