



Administrative Reviews

Determining Compliance

Administrative Review Basics

- **Formal “full” reviews**
 - At least once every 3 years
 - Announced or unannounced
 - Duration: 1-5 days...or longer
 - Record review and observation
- **In addition:**
 - Technical assistance visits
 - Follow-up reviews
 - Record reviews

After an Administrative Review

- **Exit conference**
 - Discuss preliminary findings
 - Identify areas that require immediate corrective action
- **Administrative Review Findings Letter** – includes:
 - Findings (*require corrective action*)
 - Observations with Recommendations
 - Fiscal action
 - Note: fiscal action may be appealed but **not** findings
 - Supporting Documents

After an Administrative Review

- **Return signed letter**
 - Specify repayment plan if needed
 - Noting that you plan to appeal the fiscal action does not count as the required written request for an appeal
- **Corrective Action Plan Worksheet**
 - Includes required corrective actions based on findings
 - Corrective Action numbers correspond to Finding numbers
 - Fields guide you through writing a thorough plan



Successful Corrective Action Plans

Demonstrating Commitment to
Compliance

What?

Corrective Action Plan

The steps you take to **fully** and **permanently** fix deficiencies so that you are **in compliance** with all CACFP requirements.

Why?

The USDA requires it
whenever the State Agency
identifies a deficiency.

Why?

It's a smart business practice.

Work smarter, not harder.

Protect yourself from future losses and termination.

Why?

- Document understanding of what is wrong and what needs to be done;
- Document the plan for improvement;
- Provide opportunity for the State Agency to evaluate the plan and request additional information or clarification; and
- Provide enough detail so that the State Agency can determine whether the issues were fully and permanently corrected.

How to Start?

- Read the notice
- Know the regulations and requirements
- Understand the problem
- Think about why the problem is occurring

What NOT to Do

- “The State Agency is wrong; we’re doing OK.”
 - Corrective actions are not appealable.
- “I don’t understand.”
 - Ask for explanation before your CAP is due.
- “My staff won’t do what I tell them.”
 - Passing blame is not a solution.
- “We’ll try harder” or “We’ll do it right.”
 - Progress and vague promises are not enough.

What Does a CAP Look Like?

- Who will address the deficiency?
- What actions will be implemented to address it?
- Who does this? Who is the back-up?
Who oversees them?
- When and how often is this done?
- When will the corrective action be implemented?
- Where are the records for this filed?
- How will applicable individuals be informed?
- How will you make sure this happens?

What Does a CAP Look Like?

- **S** = Specific
- **M** = Measurable
- **A** = Action-Oriented / Assignable
- **R** = Realistic
- **T** = Time-Bound

Who will address the deficiency?

- Give position title
 - Assign task to a position, not a person
 - Corrective actions must be maintained even if there is staff turnover
- Designate a back-up
- Ensure oversight

Finding: Five IES were incorrectly classified based on income.

Corrective Action: How will the center ensure that all IES are correctly classified?

Who: Sierra

NOT SPECIFIC

Who: Fairy Godmother

NOT REALISTIC

Who: Sierra Johnson, Operations Manager, classifies the IES and Monique Smith, Administrative Assistant, verifies the IES. Ron Jones, Executive Director, oversees them.

ACCEPTABLE

Who: The Operations Manager classifies the IES and the Administrative Assistant verifies the IES. The Executive Director oversees them.

ACCEPTABLE

What will be done to address it?

- Actions or procedures
 - Update staff or parent handbook
 - Create internal procedure or memo
 - Provide training
- Specific steps

What: IES will be correctly
classified based on
income.

NOT SPECIFIC

What: We will go to the State Agency IES workshop and have our Specialist classify our IES.

NOT REALISTIC

What: We have developed a checklist for ensuring that the IES is complete and correctly classified. Each IES is reviewed and then verified with the checklist. The current Income Eligibility Guidelines (for July through the following June) are used when the IES is classified based on household income. If the Administrative Assistant disagrees with the determination, the Operations Manager rechecks the IES. If there is still a disagreement, the Operations Manager will contact our Specialist. We will also attend IES trainings or workshops offered by the State Agency.

See attached checklist.

ACCEPTABLE

When and how often is this done?

- When: a specific time of the day, week, year, etc.
 - By 9 AM
 - During the first week of August
 - When the claim is being prepared for the prior month
- How often
 - When X occurs (i.e. upon initial enrollment)
 - Daily
 - Weekly
 - Monthly
 - Annually

When: We will classify the IES
when needed.

NOT SPECIFIC

When: We will classify the IES
immediately.

NOT SPECIFIC OR REALISTIC

When: The IES for re-enrolling children will be determined and verified during the first week in September each year since the annual re-enrollment applications are due at the end of August. IES for new children will be determined within two business days of enrollment. The Operations Manager will notify the Administrative Assistant when the classifications are complete, and the IES will be verified within two business days after determination.

ACCEPTABLE

When will this be implemented?

- Specific date of initial implementation

When: Now.

NOT SPECIFIC

When: The procedure was implemented for newly enrolled children on May 26. The procedure for re-enrollment will be implemented this August/September.

ACCEPTABLE

Where are the records for this filed?

- “If you didn’t document it, it’s like you never did it.”
- Specific location that others could find based on description
- Electronic and/or hard copy

Where: At the main office.

NOT SPECIFIC

Where: On the computer.

NOT SPECIFIC

Where: IES that have not yet been classified are held in the inbox on the Manager's desk. After the IES are classified, the Manager puts them in the inbox on the Assistant's desk. Once the IES are verified, they are filed alphabetically by last name in the IES section of CACFP binder for that fiscal year. The current IEG chart and IES review checklist are in the pocket of the binder. The binders are kept on the shelf behind the Manager's desk. The office is locked when the Manager and Assistant are not in the office.

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Where: ...during the first week in October, the IES for the prior year are scanned in bulk and saved with the file name “FY XXXX IES” under the FY XXXX folder within the CACFP folder on the center’s network (S:\) drive. The old IES are shredded after the file has been checked to ensure that the IES were scanned correctly.

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How will you inform people?

- Depends on groups that need to be informed:
 - Administrative staff
 - Food service staff
 - Teachers
 - Parents
- Multiple groups may need to be informed
- Specify method:
 - Training or meeting
 - Email, memo, handbook, etc.

How: I will tell them.

NOT SPECIFIC

How: The Executive Director, Operations Manager, and Administrative Assistant met on May 22 to discuss the new checklist and procedures. Each person put recurring annual reminders on their Outlook calendars for the annual deadlines.

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How will you make sure this happens?

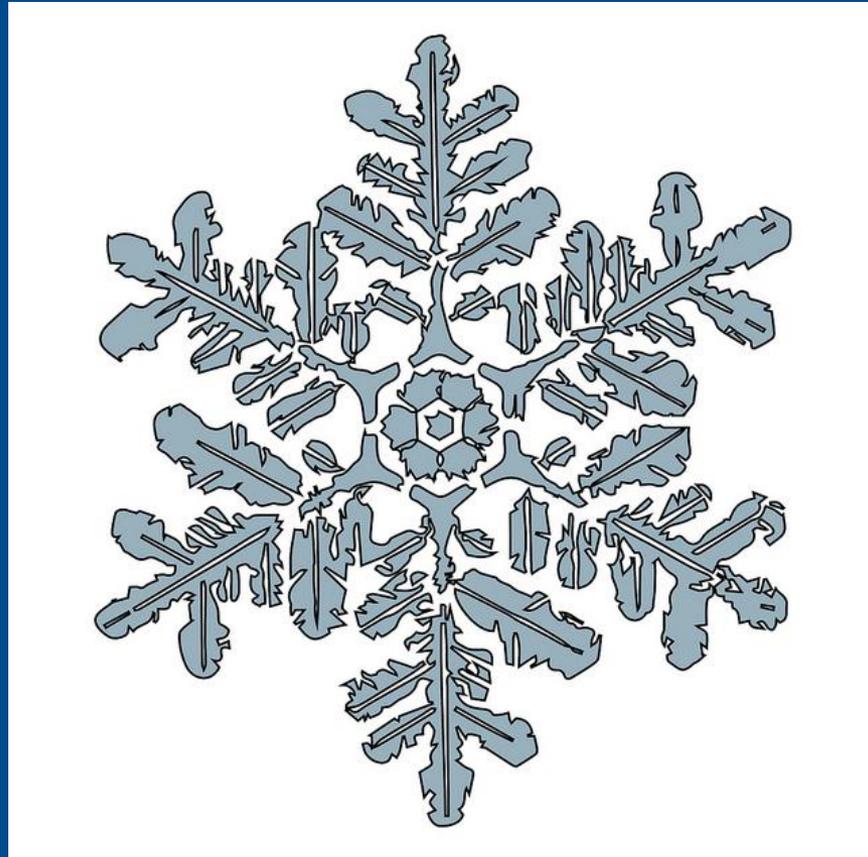
- Implementation must occur
- Monitoring or oversight is necessary

How: The Executive Director
makes sure the procedures
are implemented.

NOT SPECIFIC

How: The Administrative Assistant makes sure the IES are on file when preparing the claim each month. The Executive Director checks the CACFP binder for the new fiscal year at the end of the second week of September to make sure that the IES are determined, verified, and filed. The Executive Director has added the determination and verification of the IES to their annual performance evaluations in January of each year.

ACCEPTABLE



Each CAP is like a snowflake...

...it's unique to your center, your staff, and your operations.

In Summary

- Understand the issue and why it's happening
- Address Who, What, When, Where, & How
- Be SMART
- And then make it happen!

What You Can Do Now

- Assess current operations
 - Review “Institution Responsibility Overview” to ensure all major requirements and records are covered
- Develop policies and procedures
- Provide training, support, and oversight
- Plan for staff turnover

