

Management Evaluation

of the

Child and Adult Care Food Program

as administered by the

District of Columbia Office of State Superintendent of Education

Conducted

July 11-15, 2016

by



***United States Department of Agriculture
Food and Nutrition Service***

***Mid-Atlantic Regional Office
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District of Columbia 2016 CACFP Management Evaluation

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Executive Summary

The Management Evaluation (ME) is this office's ongoing assessment of the administration of the Child and Adult Care Food Program (CACFP). The findings of this report are the result of the ongoing exchange between this office and State agency personnel, on-site review of files, local level reviews, and discussions with members of the State agency staff. This evaluation was conducted during the period July 11-15, 2016 at the State agency office in Washington, DC. An exit conference was held on July 15, 2016 at the same location.

This year's report contains eight findings and two observations. Findings are designed to correct regulatory deficiencies in the State agency's administration of the CACFP. Findings require corrective action plans which must be submitted to FNS MARO within sixty (60) calendar days of the receipt of the ME report. The corrective action plans must include specific time frames for implementing procedures to resolve the deficiencies cited. Observations are non-regulatory suggestions for the improvement of the State agency's administration of the CACFP. Implementation of these observations is not mandatory, but a written response is requested within sixty (60) calendar days of the receipt of the ME report.

The review found that the DC Office of the State Superintendent of Education (OSSE), Wellness and Nutrition Services Department, must take additional action to fully implement procedures for the (1) application, management plan and budget approval/renewal process, (2) monitoring requirements, (3) serious deficiency and appeals processes, and (4) civil rights requirements.

We wish to thank the entire DC OSSE staff for the time and assistance extended to our office during this ME process. It is through this strong collaboration and commitment between FNS and the State agency that CACFP goals are realized efficiently and effectively.

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Introduction and Scope

The Food and Nutrition Service (FNS) uses the Management Evaluation (ME) process to assess State agency compliance with applicable Federal regulations, instructions, and policies, as well as to determine the effectiveness of SA administrative practices. We present findings and observations in an ME report based upon our review of SA policies, procedures, and associated administrative documentation, such as reports, logs, review schedules and case files. ME report conclusions also reflect information FNS Mid-Atlantic Regional Office (MARO) staff obtained during ongoing exchanges with the State agency staff, whether via email, phone, or in person during site visits.

The four areas of program operations reviewed in this year's evaluation provided a comprehensive view of the State agency's administration of the CACFP and its ability to maintain program integrity. We also conducted a local level review of one of your State's sponsoring organizations of centers to determine compliance with program regulations. These areas of review are identified below. In addition, we examined the actions taken by your agency to resolve the Fiscal Year 2011 ME finding and recommendations.

Key ME participants during onsite visit to the SA office:

State Agency	FNS
• Lindsey Palmer, State Director of CN Programs	• Paulette Buszko – MARO
• Norma Birckhead, CACFP Manager	• Danielle Gibb – MARO
• Katrina Florek, Program Specialist	• Sandra Harris – MARO
• Erica Nelson, Program Specialist	• Terry Roden - MARO
• Kristal Dail, Program Specialist	

The review period for this ME covered Fiscal Years (FY) 2013, 2014, 2015. The ME encompassed the following administrative areas:

- Application, Management Plan and Budget Approval, and Renewal Process
- Monitoring of Institutions, and State agency Oversight of Institution Monitoring Requirements
- State Agency Implementation of the Serious Deficiency and Appeals Processes
- State Agency Implementation of Civil Rights Requirements
- Local Level Review (Spanish Education Development Center)

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Status of Prior Management Evaluation

Finding 1: Monitoring

The State agency has not complied with regulatory monitoring requirements in the following areas:

- A. The State agency does not have a review tracking system that ensures compliance with all monitoring requirements.
- B. The review instrument for sponsoring organizations of family day care homes does not include a specific evaluation or examination of a sponsor's documentation to support its application of the seriously deficient home process.
- C. The five day reconciliation segment of the family day care home review instrument does not include all required elements and is completed in accordance with day care center, not home, requirements.
- D. State agency monitors do not ensure all elements on the review instrument have been completed.

Finding 2: Serious Deficiency Process

The seriously deficient provisions for institutions have not been implemented by the State agency and the day care home sponsoring organizations have not fully implemented their delegated responsibilities for the seriously deficient process.

Finding 3: The Appeals Process

The State agency does not ensure family day care home sponsors adhere to the regulatory requirements for administrative review procedures.

The current State agency appeal procedures for the review of proposed suspension due to submission of false or fraudulent claims does not adhere to regulatory requirements regarding program payments to sponsored facilities.

Finding 4: Administrative Budget Review Process

The State agency does not ensure all sponsors provide adequate documentation to support program costs and revenue presented in administrative budgets, including budget items requiring prior approval, for multi-state sponsors and/or sponsors with multiple agreements.

Finding 5: Civil Rights

The State agency does not ensure that participating institutions provide annual civil rights training to frontline staff.

DC OSSE submitted corrective actions that adequately addressed all findings listed in the 2011 Management Evaluation. The ME was closed.

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Noteworthy Initiatives

While conducting the on-site portion of the ME, we had the opportunity to meet with State agency staff to discuss all aspects of their CACFP administration. During the course of those meetings, we learned about a number of special initiatives that deserve recognition.

In early 2015, the District of Columbia enacted the Healthy Tots Act (HTA), a bill designed to promote healthier lifestyles for children in child care settings. The HTA provides local meal reimbursement funding for child development facilities, centers, and family day care home providers in addition to the Federal meal reimbursement these institutions receive through USDA, FNS' Child and Adult Care Food Program (CACFP). The purpose of this bill is threefold. It requires child development facilities to 1) adopt wellness policies for all participants, 2) develop nutritional and physical activity standards promoting healthier lifestyles in child care settings, and 3) provide additional meal reimbursement for the purchase of locally grown foods. DC's HTA works in conjunction with FNS' Healthy Hunger Free Kids Act (HHFKA) to improve the critical nutrition and food security of children.

Another initiative that also deserves special recognition is the development and implementation of DC OSSE's eLearning Center. This resource provides new and renewing CACFP organizations with the training needed to learn and improve their knowledge of CACFP, allowing them to efficiently and effectively administer the Program according to regulations. In addition to mandatory annual trainings, subject matter such as *Starting Strong – Nutrition for Infants and Toddlers*, *Nutrition for Early Learners*, *Proposed Meal Pattern Training*, *Infant Feeding*, *Serving Culturally Appropriate Meals*, and *Child and Adult Care Food Program Management Workshop* are offered to DC organizations participating in CACFP. This proactive approach to training has proven to be an effective tool in OSSE's administration of CACFP. Through eLearning, organizations gain a better understanding of Program operations.

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2016 Management Evaluation

Management Plan and Budget Review Process

Finding #1: The State agency does not have all the required documentation necessary on its new/renewing budget application forms to allow a reviewer to properly evaluate an institution's ability to administer CACFP according to required regulations.

Regulatory Citations

7CFR 226.6(b)(1)(xii) *Presence on the National disqualified list.* If an institution or one of its principals is on the National disqualified list and submits an application, the State agency may not approve the application.

7CFR 226.6(b)(2)(ii) *Presence on the National disqualified list.* If, during the State agency's review of its application, a renewing institution or one of its principals is determined to be on the National disqualified list, the State agency may not approve the application. If a renewing sponsoring organization submits an application on behalf of a facility and the State agency determines that either the facility or any of its principals is on the National disqualified list, the State agency may not approve the application.

7CFR 226.6 (b)(1)(xviii), 7CFR 226.6(b)(2)(vii) *Compliance with performance standards.* Each new/renewing institution must submit information sufficient to document that it is financially viable, is administratively capable of operating the Program in accordance with this part, and has internal controls in effect to ensure accountability... (A) *Performance Standard 1-Financial viability and financial management.* The new/renewing institution must be financially viable... (B) *Performance Standard 2 – Administrative capability.* The new/renewing institution must be administratively capable. Appropriate and effective management practices must be in effect to ensure that the Program operates in accordance with this part... (C) *Performance Standard 3 – Program accountability.* The new/renewing institution must have internal controls and other management systems in effect to ensure fiscal accountability and to ensure that the Program will operate in accordance with the requirements of this part...

7CFR 226.6(b)(1)(vii) *Documentation of tax-exempt status.* All private non-profit institutions must document their tax-exempt status.

7CFR 226.6(b)(3) *State agency notification requirements.* Any new or renewing institution applying for participation in the Program must be notified in writing of approval or disapproval by the State agency, within 30 calendar days of the State agency's receipt of a complete application...

Explanation

When reviewing an institution's new/renewal application and budget, the State agency must ensure that all information required by 7CFR 226.6(b) for the efficient and effective

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administration of CACFP is contained within those documents. An evaluation of OSSE's new/renewal application and budget forms noted the following omissions:

- A verification by the State agency that the institution and/or its individuals responsible for CACFP administration were not on the NDL.
- A certification that the institution and its responsible individuals meet all performance standards required for Program compliance – financially viable, administratively capable, and accountable.
- A State agency verification that non-profit institutions are not on the IRS' Automatic Revocation of Exemption List.
- The date the institution submitted its new/renewal application and budget forms and the date the State agency approved/disapproved the submission.

Corrective Actions Required

- The State agency must revise its new/renewal application forms to include NDL verification of all institutions and its responsible individuals.
- The State agency must incorporate all performance standards into its new/renewing application forms.
- The State agency must update its application forms to include an edit check that ensures all non-profit institutions have current tax-exempt status from the IRS.
- The State agency must revise its new and renewing application and budget forms to include a date that the institution submitted a completed application package and a date that the State agency approved/disapproved the application.
- The State agency must revise its written procedures for reviewing applications and budgets to include instructions for all revisions made to the forms and submit these new procedures to this office for review.
- Train OSSE staff members responsible for evaluating new/renewing applications and budgets so that they can determine whether the application and all supporting documentation submitted by a new/renewing institution meets all regulatory requirements necessary for CACFP participation. Provide this office with a copy of the training agenda, date of the training, instructor, and signatures of all attendees.
- Submit the revised application forms to this office for review and approval.

Finding #2: The State agency does not maintain all required documentation necessary for Program compliance for owners and responsible individuals of institutions participating in CACFP.

Regulatory Citation

7CFR 226.6(b)(1)(xv), 7CFR 226.6(b)(2)(v) *Certification of truth of applications and submission of names and addresses.* Institutions must submit a certification that all information on the application is true and correct, along with the name, mailing address, and date of birth of the institution's executive director and chairman of the board of directors or, in the case of a for-profit center that does not have an executive director or is not required to have a board of directors, the owner of the for-profit center.

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Explanation

A review of six of the State agency's new/renewing application files revealed the absence of dates of birth for the CACFP primary contacts for five out of the six institutions. The institutions missing dates of birth on the application forms were Anchor Mental Health Association, Edward C Mazique, House of Ruth, Martha's Table, and Milestone Enrichment Center.

Corrective Actions Required

- The State agency must ensure that all new/renewing applications contain dates of birth for the institution's owners and primary CACFP contacts.
- Update the applications with dates of birth for owners and responsible individuals for Anchor Mental Health Association, Edward C Mazique, House of Ruth, Martha's Table, and Milestone Enrichment Center and submit the revisions to this office for review.

SA Monitoring of Institutions, and SA Oversight of Institution Monitoring Requirements

Finding #3: The State agency could not produce all of the administrative review documentation needed to evaluate program compliance for the monitoring portion of the ME.

Regulatory Citation

7CFR 226.6(m) *Program assistance – (1) General ...* The State agency must maintain documentation of supervisory assistance activities, including reviews conducted, corrective actions prescribed, and follow-up efforts.

Explanation

While the State agency maintains an administrative review log with updated information on each review conducted and a file for each institution reviewed, many of those files were incomplete and did not contain the documentation needed to properly evaluate the State agency's compliance with Program monitoring regulations. The State's monitors also maintain files for the reviews conducted and may have the missing program documentation within their files, but those files were located on their personal computer drives not always available or accessible to others.

Ten institutions were reviewed. The reviewer could only evaluate seventeen of the required twenty files. Documentation was not on file for the 2015 review for Beacon House, the 2015 review for T&T Tutor World, and the 2014 review for Zena. Documentation was not consistent in determining when a review was closed. The finding letters for two institutions did not have a corrective action due date even though corrective actions were received within the required thirty days.

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Corrective Actions Required

- The State agency must develop internal processes to ensure that all administrative review documentation is kept in a central file that is accessible to all and provide training to all monitors regarding these new procedures.
- Submit a copy of these new procedures to this office for review.
- Submit a copy of the administrative reviews that were not available at the time of the ME for the following institutions, including any facility reviews conducted by the sponsoring organizations: 2015 reviews for Beacon House and T&T Tutor World, and 2014 review for Zena.

Finding #4: The State agency timelines for their administrative review process were non-compliant with Program regulations.

Regulatory Citation

7CFR 226.6(a)(5) *State agency personnel*. Each State agency must provide sufficient consultative, technical, and managerial personnel to: (1) Administer the Program; (2) Provide sufficient training and technical assistance to institutions; (3) Monitor Program performance; (4) Facilitate expansion of the Program in low-income and rural areas; and (5) Ensure effective operation of the Program by participating institutions.

Explanation

During the evaluation of its monitoring process for institutions, the State agency's administrative review timeframes were too long. Ten State agency administrative reviews were assessed for compliance and Program integrity. The following chart shows four reviews from the dates of the actual reviews until successful corrective actions were achieved and the reviews were closed.

Institution	Review	Report	CAP Dates	Closure	Time Lapse
Bean Foundation	4/8/2014	8/26/2014	9/19/2014	3/4/2015	11 months
NW Settlement	6/23/2013	10/18/2013	11/23/2013	2/27/2014	8 months
Bright Beginnings	6/4/2013	7/1/2013	8/9/2013, 3/10/2014	5/27/2014	11 months
Centronia	2/4/2015*	7/10/2015*	8/7/2015	Not in file	*5 mos to issue a report

Corrective Actions Required

- The State agency must put internal processes in place to ensure that all administrative reviews are completed within more appropriate timeframes.
- Submit a copy of these processes to this office for review.
- Provide training to all staff responsible for conducting administrative reviews to ensure the entire review process is completed within timeframes that support Program integrity.
- Submit a copy of the training agenda, date of training, name of instructor(s), signatures of attendees.

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- Provide this office with a copy of the closure letter sent to Centronia for the February 4, 2015 review conducted.

State Agency Implementation of the Serious Deficiency and Appeals Process

Finding #5: The State agency is not maintaining their seriously deficient log for child care institutions, sponsoring organizations, and family day care home providers.

Regulatory Citation

7CFR 226.6 (c)(8) *State agency list – (i) Maintenance of the State agency list.* The State agency must maintain a State agency list (in the form of an actual paper or electronic list or retrieval paper records). The list must be made available to FNS upon request, and must include the following information: (A) Institutions determined to be seriously deficient by the State agency, including the names and mailing addresses of the institution and the status of the institutions as they move through the possible subsequent stages of corrective action, proposed terminations, suspension, agreement termination, and/or disqualification, as applicable; (B) Responsible principals and individuals who have been disqualified from participation by the State agency, including their names, mailing addresses, and dates of birth; and (C) Day care home providers whose agreements have been terminated for cause by a sponsoring organization in the State, including their names, mailing addresses, and dates of birth.

Explanation

While the State agency does have a seriously deficient log with the elements required for Program compliance, it is not being updated by OSSE program staff. A comparison of the log to seriously deficient files for child care institutions Shiloh, Wibble Wobble, and Emergent Prep Academy confirmed this finding.

Corrective Actions Required

- The State agency must update its seriously deficient log to include all institutions that have been declared seriously deficient since FY2013 and must accurately reflect each stage of the process.
- Submit the revised seriously deficient log to this office for review.
- Submit all complete files for seriously deficient correspondence for institutions to this office.

Finding #6: The State agency is non-compliant with Program regulations regarding the seriously deficient process for institutions.

Regulatory Citations

7CFR 226.6(c)(3)(iii)(A) *Notice of serious deficiency.* The State agency must notify the institution...At the same time the notice is issued, the State agency must add the institution to the

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State agency list, along with the basis for the serious deficiency determination, and provide a copy of the notice to the appropriate FNSRO. The notice must also specify: (1) The serious deficiency(ies); (2) The actions to be taken to correct the serious deficiency(ies); (3) The time allotted to correct the serious deficiency(ies)...

7CFR 226.6 (c)(3)(iii)(C) *Proposed termination and proposed disqualification.* If timely corrective action is not taken to fully and permanently correct the serious deficiency(ies), the State agency must notify the institution's executive director and chairman of the board of directors, and the responsible principals and responsible individuals, that the State agency is proposing to terminate the institution's agreement and to disqualify...

7CFR 226.6(c)(4)(i) *Corrective action timeframes-(i) General.* Except as noted in this paragraph (c)(4), the State agency is prohibited from allowing more than 90 days for corrective action from the date the institution receives the serious deficiency notice.

7CFR 226.6(k)(5)(ii) *Time to request administrative review.* The request for administrative review must be submitted in writing not later than 15 days after the date the notice of action is received, and the State agency must acknowledge the receipt of the request for an administrative review within 10 days of its receipt of the request.

7 CFR 226.6 (k)(5)(ix) *Time for issuing a decision.* Within 60 days of the State agency's receipt of the request for an administrative review, the administrative review official must inform the State agency, the institution's executive director and chairman of the board of directors, and the responsible principals and responsible individuals, of the administrative review's outcome. This timeframe is an administrative requirement for the State agency and may not be used as a basis for overturning the State agency's action if a decision is not made within the specified timeframe.

CACFP 01-2007: Retention of records relating to institutions, responsible principals or responsible individuals, and family day care homes on the NDL; retention of records relating to serious deficiencies

HHFKA Section 332: State Liability for Payments to Aggrieved Child Care Institutions (2) Reimbursement. In accordance with paragraph (3), a State agency that fails to meet timeframes for providing an opportunity for a fair hearing and a prompt determination to any institution under paragraph (1) in accordance with regulations promulgated by the Secretary, shall pay, from non-Federal sources, all valid claims for reimbursement to the institutions and the facilities of the institution during the period beginning on the day after the end of any regulatory deadline for providing the opportunity and making the determination and ending on the date on which a hearing determination is made.

Explanation

While the State agency has written procedures for the seriously deficient and appeals process, those procedures are very general and do not contain many key elements necessary for effective and efficient Program administration. As a result, the State agency is not consistent when implementing the seriously deficient process. Discrepancies were found in the State agency's

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1) process for determining serious deficiencies, 2) timeframes for corrective actions, appeals, appeal acknowledgements, appeal hearings, and appeal decisions, 3) submission of seriously deficient correspondence issued to institutions to the regional office, and 4) retention of records relating to serious deficiencies.

Corrective Actions Required

- The State agency must revise its written procedures to ensure the serious deficiency process is utilized correctly. These procedures must include information that
 - 1) allows the reviewer to determine whether or not a serious deficiency is warranted. Criteria such as the severity of a problem, past review history, degree to which the problem impacts Program integrity, and/or unsuccessful corrective action provide State agency reviewers with a guideline for assessing an organization's CACFP administration;
 - 2) follows Program regulations regarding timeframes for all phases of the seriously deficient and appeal processes;
 - 3) includes submitting all seriously deficient correspondence to the regional office;
 - 4) ensures adherence to all Program requirements regarding record retention.
- Submit a copy of these written procedures to this office for review.
- The State agency needs to conduct training for all staff responsible for conducting administrative reviews so that they understand the serious deficiency process and can effectively use it to ensure Program integrity.
- Upon completion, submit a copy of the training agenda, date of training, name of the instructor, and signatures of attendees to this office.

Finding #7: The current method used by the State agency to monitor a sponsoring organization as it implements the serious deficiency process for family day care home providers does not successfully support regulation requirements.

Regulatory Citations

7CFR 226.6 State agency administrative responsibilities. (a) *State agency personnel*. Each State agency must provide sufficient consultative, technical, and managerial personnel to: (1) Administer the Program; (2) Provide sufficient training and technical assistance to institutions; (3) Monitor Program performance; (4) Facilitate expansion of the Program in low-income and rural areas; and (5) Ensure effective operation of the Program by participating institutions.

7CFR 226.16(1) *Termination of agreements for cause-(1) General*. The sponsoring organization must initiate action to terminate the agreement of a day care home for cause if the sponsoring organization determines the day care home has committed one or more serious deficiency listed in paragraph (1)(2) of this section...

Additional Reference: Serious Deficiency, Suspension, and Appeals for State Agencies and Sponsoring Organizations Handbook: Part 2. Serious Deficiency Process for Day Care Homes... "The sponsoring organization must provide a copy of the notices to the appropriate State agency".

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Explanation

A review of State agency serious deficiency files for family day care home providers revealed several instances when Program regulations were not being implemented.

1. Sponsoring organizations were not utilizing the serious deficiency process. Only two providers were declared seriously deficient since FY 2013.
2. State agency serious deficiency files were incomplete. T&T Tutor World declared providers Elvira Patrick and Kesha Mease seriously deficient, but the only documentation in the State agency files was the notice of temporary deferral for Elvira Patrick. There was no other seriously deficient correspondence in the files for Elvira Patrick or Kesha Mease.

Corrective Actions Required

- The State agency must develop written procedures that include all key elements of the serious deficiency process for family day care home providers and also contain specific details on a sponsoring organization's implementation of this process.
- Submit these procedures to this office for review.
- Conduct training for all sponsors of family day care homes and reinforce: 1) the importance of addressing each step of the serious deficiency process, 2) adherence to regulatory timeframes, and 3) submission of complete case files to the State agency.
- Submit an agenda of the training provided, the date(s) of the training, instructor(s), and signatures of all attendees.
- Submit all seriously deficient correspondence for Elvira Patrick and Kesha Mease to this office.

State Agency Implementation of the Civil Rights Requirements

Finding #8: The State agency's written agreements, program materials, and web site(s) do not contain the most recent civil rights statements required by Federal regulations.

Regulatory Citations

FNS Instruction 113-1, Appendix B, Section D, (2)(c) CACFP and SFSP: State agencies will incorporate the following CR assurance into all written agreements...

FNS Instruction 113-1: Nondiscrimination Statement

Explanation

The State agency's written agreements, program materials, and web site(s) do not contain the most current civil rights assurance language and/or non-discrimination statements. The assurance language is required on agreement documents to ensure the program is operated in a nondiscriminatory manner at all levels. The nondiscrimination statement is required on documents and materials that the State and local agencies/subrecipients develop for applicants

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and participants (applications, brochures, pamphlets, etc.) to inform them about FNS nutrition assistance programs.

Corrective Actions Required

- The State agency must revise its written agreements to include the most current assurance language found in FNS Instruction 113-1, Appendix B, Section D, (2)(c) and submit the revision to this office for review.
- The State agency must revise its nondiscrimination statement on all materials that it distributes to the public informing them about FNS nutrition assistance programs.
- The State agency must revise its web site(s) to include the most current assurance language and/or nondiscrimination statement as required by Federal regulations.

Observation #1: In reviewing the administrative budgets and management plans for renewing institutions, it was noted that the State agency does not have a separate line item for sponsoring organizations to list funds allocated for monitoring its facilities. Program regulations require that sponsoring organizations conduct three monitoring reviews/year of each facility with two of those reviews unannounced and one announced. Each review may not be more than 6 months apart.

Recommendation

With Program integrity playing a major role in the administration of CACFP, we highly suggest that the State agency add a line item in the sponsoring organization's administrative budget and management plan that allows them to specifically allocate funds for monitoring its facilities. Including this line item will allow the State agency to determine if adequate resources are being used for this purpose.

Observation #2: During a review of the State agency's procedures for budget approval, it was noted that there was no written information regarding an institution's request for amending its administrative budget and the State agency's review of an amended budget.

Recommendation

We recommend that the State agency revise its procedures to include information specific to an institution's request for amending its administrative budget as well as the steps the State agency takes in reviewing an amended budget. Adding this information will strengthen the State agency's administrative budget procedures and allow institutions to more accurately reflect the use of their Program funds.

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Local Level Review

The local level review was conducted the week of July 11, 2016. FNS MARO Program Specialist Terry Roden accompanied DC OSSE staff member Katrina Florek on the review. The purpose of this review was twofold. The State agency evaluated the institution's ability to administer CACFP according to regulations, and Mr. Roden was able to assess the State agency's implementation of Program regulations while conducting the review. The child care institution selected for this review was Spanish Education Development Center, a center of child care and head start programs, located in Washington, DC.

The comprehensive evaluation of the organization's compliance with CACFP included its use of program funds and all facets of program operations including, but not limited to, the institution's recordkeeping ability, income eligibility determinations, menu and meal count data, training documentation, and validation of the review month's claim for reimbursement.

MARO's review of Spanish Education Development Center detected the following deficiencies:

- Month of review (May 2016), reclaiming 39 Breakfast, 35 Lunches and 27 PM Snacks
- Missing medical statements on file for all substitutions related to medical needs for two: Anthony Gutierrez Lanuza and Zoe Forester
- Menu substitutions/additions/deletions were not reflected on menus: Lunch menu dated 7/12 showed cantaloupe and apples were served; none of the menus listed in the kitchen, main office and classrooms listed the correct fruit component for the lunch served.
- Income Eligibility Statement errors on 8 forms out of 154.
- Master Enrollment List had one error.
- The following error was detected on the agency's ethnicity data form:
Number of Hispanic or Latino: 118
Number of Not Hispanic or Latino: 33
Three children were not accounted for.

A comparison of MARO's local level review results with the State agency's administrative review revealed the same deficiencies. The State agency's evaluation of this organization was thorough and efficient. The results of the administrative review and the corrective actions required were sent to the institution on August 23, 2016.

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Appendix A **Required Corrective Actions**

Finding #1

- The State agency must revise its new/renewal application forms to include NDL verification of all institutions and its responsible individuals.
- The State agency must incorporate all performance standards into its new/renewing application forms.
- The State agency must update its application forms to include an edit check that ensures all non-profit institutions have current tax-exempt status from the IRS.
- The State agency must revise its new and renewing application and budget forms to include a date that the institution submitted a completed application package and a date that the State agency approved/disapproved the application.
- The State agency must revise its written procedures for reviewing applications and budgets to include instructions for all revisions made to the forms and submit these new procedures to this office for review.
- Train OSSE staff members responsible for evaluating new/renewing applications and budgets so that they can determine whether the application and all supporting documentation submitted by a new/renewing institution meets all regulatory requirements necessary for CACFP participation. Provide this office with a copy of the training agenda, date of the training, instructor, and signatures of all attendees.
- Submit the revised application forms to this office for review and approval.

Finding #2

- The State agency must ensure that all new/renewing applications contain dates of birth for the institution's owners and primary CACFP contacts.
- Update the applications with dates of birth for owners and responsible individuals for Anchor Mental Health Association, Edward C Mazique, House of Ruth, Martha's Table, and Milestone Enrichment Center and submit the revisions to this office for review.

Finding #3

- The State agency must develop internal processes to ensure that all administrative review documentation is kept in a central file that is accessible to all and provide training to all monitors regarding these new procedures.
- Submit a copy of these new procedures to this office for review.
- Submit a copy of the administrative reviews that were not available at the time of the ME for the following institutions, including any facility reviews conducted by the sponsoring organizations: 2015 reviews for Beacon House and T&T Tutor World, and 2014 review for Zena.

Finding #4

- The State agency must put internal processes in place and train staff to ensure that all administrative reviews are completed within more appropriate timeframes.
- Submit a copy of these processes to this office for review.

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- Provide training to all staff responsible for conducting administrative reviews to ensure the entire review process is completed within timeframes that support Program integrity.
- Submit a copy of the training agenda, date of training, name of instructor(s), signatures of attendees.
- Provide this office with a copy of the closure letter sent to CentroNia for the February 4, 2015 review conducted.

Finding #5

- The State agency must update its seriously deficient log to include all institutions that have been declared seriously deficient since FY2013 and must accurately reflect each stage of the process.
- Submit the revised seriously deficient log to this office for review.
- Submit all complete files for seriously deficient correspondence for institutions to this office.

Finding #6

- The State agency must revise its written procedures to ensure the serious deficiency process is utilized correctly. These procedures must include information that:
 1. allows the reviewer to determine whether or not a serious deficiency is warranted. Criteria such as the severity of a problem, past review history, degree to which the problem impacts Program integrity, and/or unsuccessful corrective action provide State agency reviewers with a guideline for assessing an organization's CACFP administration;
 2. follows Program regulations regarding timeframes for all phases of the seriously deficient and appeal processes;
 3. includes submitting all seriously deficient correspondence to the regional office;
 4. ensures adherence to all Program requirements regarding record retention.
- Submit a copy of these written procedures to this office for review.
- The State agency needs to conduct training for all staff responsible for conducting administrative reviews so that they understand the serious deficiency process and can effectively use it to ensure Program integrity.
- Upon completion, submit a copy of the training agenda, date of training, name of the instructor, and signatures of attendees to this office.

Finding #7

- The State agency must develop written procedures that include all key elements of the serious deficiency process for family day care home providers and also contain specific details on a sponsoring organization's implementation of this process.
- Submit these procedures to this office for review.
- Conduct training for all sponsors of family day care homes and reinforce: 1) the importance of addressing each step of the serious deficiency process, 2) adherence to regulatory timeframes, and 3) submission of complete case files to the State agency.
- Submit an agenda of the training provided, the date(s) of the training, instructor(s), and signatures of all attendees.

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- Submit all seriously deficient correspondence for Elvira Patrick and Kesha Mease to this office.

Finding #8

- The State agency must revise its written agreements to include the most current assurance language found in FNS Instruction 113-1, Appendix B, Section D, (2)(c) and submit the revision to this office for review.
- The State agency must revise its nondiscrimination statement on all materials that it distributes to the public informing them about FNS nutrition assistance programs.
- The State agency must revise its web site(s) to include the most current assurance language and/or nondiscrimination statement as required by Federal regulations.

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Appendix B Case Files Reviewed

The review team examined the records of multiple institutions and homes as recorded below.

Administrative Budget Process

New Application Review:

Deliverance Child Care Center
Lt. Joseph P. Kennedy Institute Early Child Development and Intervention Program
Multicultural Career Intern Program - Bell Teen Parent and Child Development Center

Renewing Institutions Budget Review

Anchor Mental Health Association
Edward C Mazique
Growing Seeds
House of Ruth
Martha's Table
Milestone Enrichment Center

Food Service Management Contract Reviews

Children's Hut
House of Ruth
Southeast Children's Fund

Monitoring

Sponsoring Organizations and Facilities Reviewed:

Beacon House
Bean Foundation
Centronia
Edward Mazique
Reeves Center
Loving Care
Loving Care Day Nursery, 616 H St. NE
Loving Care Day Nursery, 114 Kennedy St. NW
T&T Tutor World
Artimitia Mitchell
Lorraine Wooten
Corliss Richardson
Cleotilde Kimmell
Khadijah Thomas

Zena

Institutions:

Bright Beginnings
Creative Korner
Northwest Settlement

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Seriously Deficient

Institutions:

Emergent Prep Academy

Shiloh

Wibble Wobble

Sponsoring Organization's Family Day Care Homes:

T&T Tutor World