

What to Expect:

Child and Adult Care Food Program Administrative Review



Health and Nutrition Services
Arizona Department of Education





Disclaimer

This training was developed by the Arizona Department of Education (ADE) Health and Nutrition Services Division (HNS). The content in this training is intended for professionals operating one or more USDA Child Nutrition Programs in Arizona under the direction of ADE. The information in this training is subject to change. Attendees are encouraged to access professional development materials directly from the training library to prevent use of outdated content.

Intended Audience

This training is intended for organizations operating the Child and Adult Care Food Program (CACFP) receiving an Administrative Review. All regulations are specific to operating the CACFP under the direction of ADE. This training does not apply to Family Day Care Home (FDCH) Sponsors.

Objectives

At the end of this training, attendees will:

- understand the State agency monitoring requirements for entities undergoing a CACFP Administrative Review (AR);
- know what to expect of the review process;
- be familiar with all formal correspondence that will be initiated by the HNS Reviewer; and
- understand potential review outcomes and actions to be taken after the review.

TRAINING HOURS

A training certificate will be available at the end of this course. This training counts toward Empower Program training requirements. It is listed on the Arizona Early Childhood Workforce Registry. If you want this training to appear on your Registry transcript, please provide your ID in the completion survey.

Training Title: What to Expect:
Child and Adult Care Food Program
Administrative Review

Key Area: N/A

Learning Code: N/A

Length: 30 Minutes

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WHAT TO EXPECT:
CHILD AND ADULT CARE FOOD PROGRAM ADMINISTRATIVE REVIEW

Section One: State Agency Monitoring Requirements



Intent of the Administrative Review

The administrative review is set in place to ensure program compliance and for State agencies to provide technical assistance. The intent of the administrative review is to:

- determine if program requirements are being met;
- provide technical assistance specific to the organization;
- help organizations determine how corrective action will be implemented into their operation to assure technical assistance is understood and impactful; and
- assess fiscal action (if applicable).



Administrative Review

The Arizona Department of Education (ADE) is required to conduct administrative reviews of all organizations operating the Child and Adult Care Food Program (CACFP) at least once during each 3-year review cycle. During the administrative review, ADE will review all Child Nutrition Programs (CNPs) the organization is operating during the year of review.

Minimum Number of Sites to Review

At a minimum, State agencies must review at least 10% of an organization's operating sites. The HNS Reviewer will use the chart below to determine the number of sites that will be selected for review.

NUMBER OF SITES	MINIMUM NUMBER OF SITES TO REVIEW FOR SFSP
1-10	1
11-20	2
21-30	3
31-40	4

Scheduling the Administrative Review

The CACFP operates under the Program Year (PY), October- September. ADE will schedule in-person administrative reviews during the months of March through September for organizations that are up for review for the PY.

Typical months of CACFP reviews during the PY.

October
November
December
January
February
March
April
May
June
July
August
September

THE STATE AGENCY WILL PROVIDE WRITTEN NOTIFICATION OF THE REVIEW FINDINGS (ADMINISTRATIVE REVIEW SUMMARY AND REPORT) TO THE SPONSOR REPRESENTATIVE (OR EQUIVALENT POSITION) WITHIN 30 DAYS OF THE EXIT CONFERENCE.

Review

Correspondence

ORGANIZATIONS SCHEDULED TO RECEIVE AN ADMINISTRATIVE REVIEW WILL RECEIVE AN EMAIL FROM THEIR REVIEWER NOTIFYING THEM OF THE UPCOMING REVIEW.

The email notification does not provide specific dates for when the review will be conducted.

Quiz Time

True or False: All organizations receiving an administrative review will be notified of the date their review will be conducted.

A True

B False



Quiz Time

True or False: All organizations receiving an administrative review will be notified of the date their review will be conducted.

A True

B False

Organizations receiving an administrative review will be notified of their upcoming administrative review for the current program year. The notification will not include the date of when the administrative review will be conducted.



Scope of the Administrative Review

The administrative review will focus on the accountability requirements in the areas of:

- **Enrollment** – DHS Emergency Information and Immunization Cards (Blue Cards), Meal Benefit Income Eligibility Forms, Claiming Rosters (for review month), DES Billing Records (for review month), and Sign In/Out Sheets (for the review month).
- **Meal Counting** – Child, Infant, and/or Adult Point of Service Meal Count Sheets and Meal Count Summary Sheet (for evaluation month).
- **Menu and Supporting Documentation** – Menu (for review month), Participant Menu Modification Forms, Supporting documentation for all whole grain-rich items, commercially prepared entrees, cereals, and yogurt being served.
- **Safety and Sanitation** – Kitchen Permit, Food Handler Certificates and Food Safety Manager Card (according to county).

Scope of the Administrative Review Continuation

The administrative review will focus on the accountability requirements in the areas of:

- **Administrative and Operational Costs** – Receipts and invoices to support program purchases, Food Service Vendor/Provider receipts (for evaluation month, if applicable), Time Distribution Reports, and lease payment receipt.
- **Monitoring** – Site monitoring for organizations with multiple operating sites.
- **Procurement** – Documentation to support compliance with micro, small, and formal purchases (if applicable).

WHAT TO EXPECT:
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Section Two: The Administrative Review Process



On-Site Requirements of the Review

TO CONDUCT AN ADMINISTRATIVE REVIEW, THE STATE AGENCY MUST:

- gather and assess information off-site and/or on-site; and
- observe the site's food service operation during the day of the administrative review.



Assigned Reviewer

HNS has a team of reviewers that conduct all Child Nutrition Program reviews.

Organizations will be assigned one HNS Reviewer to conduct the entirety of the review.

Organizations can expect to be in constant contact with their assigned HNS Reviewer throughout the entire review process.



Type of Administrative Review

ADE IS REQUIRED TO REVIEW 33.3% OF ALL THE ORGANIZATIONS PARTICIPATING IN THE CACFP. AT LEAST 15% OF THESE REVIEWS MUST BE UNANNOUNCED EACH YEAR.

- **Unannounced Review:** An on-site review for which no prior notification is given to the organization regarding when the on-site visit will be conducted and what month of documentation will be requested for review.
- **Announced Review:** An on-site review for which prior notification is given to the organization of when the on-site visit will be conducted and what month will be reviewed and what month of documentation will be requested for review.

What to Expect of the Unannounced Administrative Review

The **unannounced** AR occurs in the following order:

- The HNS Reviewer will visit the organization's sites that are up for an administrative review without notifying the organization.
- The HNS Reviewer will conduct an Entrance Conference at the time of arrival and will provide the organization's representative with a checklist of all the documentation that will be reviewed as well as the month being reviewed.
- The organization representative will compile all the requested documentation.
- The HNS Reviewer will conduct a meal observation.
- The HNS Reviewer will conduct an Exit Conference at the end of the administrative review and will provide the organization's representative with an overview of all the findings identified during the review.
- **Within 30 days of the Exit Conference**, the organization will receive an *Administrative Review Summary Report*.



What to Expect of the Announced Administrative Review

The **announced** AR occurs in the following order:

- **At least five weeks prior to the day of the On-Site Administrative Review**, the organization will be notified of the administrative review and the assigned HNS Reviewer will provide the Confirmation Memo & Checklists.
 - The organization will compile and have documentation ready by the communicated deadlines.
 - The HNS Reviewer will notify the organization representative if additional documentation will be needed at the time of the on-site review
- **Prior to the day of the On-Site Administrative Review**, logistics of the visit will be discussed
- **On the day(s) of the On-Site Administrative Review**, an Entrance Conference, meal observation(s) for all site(s) selected and an Exit Conference will be conducted
- **Within 30 days of the Exit Conference**, the organization will receive an Administrative Review Summary Report

Notification of the Scheduled Review

At least five weeks prior to the day of on-site announced administrative review, the HNS Reviewer will notify the organization that the review has been scheduled. At this time, the HNS Reviewer will provide the Confirmation Memo & Checklists.

- **Confirmation Memo & Checklists** — Outlines the details of the AR and lists documentation required to be submitted to the HNS Reviewer prior to the day of review as well as documentation required to be provided to the HNS Reviewer on the day of review.
- **Copy of Previous AR Report** — Included to assist sponsors in reviewing previous findings to ensure they have been corrected

THE CONFIRMATION MEMO & CHECKLIST OUTLINES THE DETAILS OF THE ADMINISTRATIVE REVIEW AND LISTS DOCUMENTATION REQUIRED TO BE SUBMITTED TO THE HNS REVIEWER BY THE COMMUNICATED DEADLINES, AS WELL AS DOCUMENTATION REQUIRED TO BE PROVIDED TO THE HNS REVIEWER ON THE DAY OF THE REVIEW.

Confirmation Memo

The intent of the Confirmation Memo is to indicate which site(s) will be reviewed and the timeframe in which the review will occur. Included in the Confirmation Memo are checklists of documents that will need to be sent to the reviewer by the provided deadlines. All requested documents will have a deadline prior to or on the day of the on-site administrative review.

The HNS Reviewer will provide the Confirmation Memo via email to the organization's representative at least five weeks prior to the on-site administrative review.

Note: The Confirmation Memo mentioned above applies to **announced** reviews only. **Unannounced** reviews will not receive a Confirmation Memo with the specific date of their review.



Health & Nutrition Services Division

[DATE]

[SPONSOR REPRESENTATIVE NAME & TITLE]
[RECORD KEEPER NAME & TITLE]
[SPONSOR NAME]
[SPONSOR MAILING ADDRESS]
[CITY, STATE, ZIP]

Dear [SPONSOR REPRESENTATIVE & RECORD KEEPER NAMES]:

Per our previous communication, [SPONSOR NAME] is required to partake in an Administrative Review of the Child and Adult Care Food Program (CACFP) and At-Risk Afterschool Meals during the 2022 program year. This review is announced and will be conducted on [DATE SELECTED FOR REVIEW] for the month of [MONTH OF REVIEW]. The site(s) selected for the Administrative Review is/are: [SITE(S) SELECTED FOR REVIEW].

The Administrative Review assesses compliance with Federal and state regulations in areas such as meal counting and claiming, meal pattern, purchasing, and civil rights in order to confirm that the Federal funding received is being used effectively. Additionally, the Administrative Review provides an environment for the State agency to provide Sponsor-specific technical assistance.

Please review all enclosed documents:

- **Required Phase 1 Documentation** checklist outlines the materials that should be organized and sent by [DATE WITHIN MONTH PRIOR TO ON-SITE].
- **Required Phase 2 Documentation** checklist outlines the materials that should be organized and readily available on [DATE OF REVIEW].
- **Previous CA Letter** from Program Year [PROGRAM YEAR OF PREVIOUS AR].

As a reminder, the Arizona Department of Education, Health and Nutrition Services Division offers training opportunities throughout the year. A web-based training overviewing what to expect of your administrative review will be made available on ADE's website at <https://www.azed.gov/hns/covid19>, under the accordion Reviews Conducted by the State Agency.

If you have any questions regarding the review, please contact me at [REVIEWER'S PHONE #] and/or [REVIEWER'S EMAIL ADDRESS].

Sincerely,

[REVIEWER'S NAME AND TITLE]
Health and Nutrition Services Division

*Confirmation
Memo*

The pages following the Confirmation Memo include checklists containing lists of required documents grouped in two phases. Each phase will have a unique deadline for the organization to submit incrementally rather than all at once.

- Note: The checklists mentioned above apply to announced reviews only. Unannounced reviews will receive one checklist upon reviewer's arrival.

Administrative Review Checklist

Checklist Documentation

DOCUMENTATION DUE DATES

Many items on the checklists will be tied to specific dates within the assigned review period. The organization representative may have to wait for those dates to pass before making copies of the documents to provide to the HNS Reviewer.

- **Phase 1** documentation will be required to be submitted on or before the specified date prior to the on-site administrative review.
- **Phase 2** documentation will be required to be provided on the day of the on-site administrative review.

PLEASE NOTE...

Note: The due dates mentioned above apply to announced reviews only. Unannounced reviews will receive one checklist upon reviewer's arrival.

Phase 1: Off Site

OPERATIONAL REQUIREMENTS:

- Enrollment and Attendance
- Meal Counts
- Safety and Sanitation
- Administrative and Operational Costs
- 5-Day Reconciliation
- At-Risk Records
- Procurement
- Monitoring

Menu Documentation for Week of Review:

- Menus; production records (if applicable); Nutrition Facts labels (including ingredient list) for all whole grain-rich items, yogurts, and cereals served; and Product Formulation Statements and Child Nutrition labels for all commercially prepared products.

PLEASE NOTE...

Note: The due dates mentioned above apply to announced reviews only. Unannounced reviews will receive one checklist upon reviewer's arrival.

Phase 2: On Site

OPERATIONAL REQUIREMENTS:

- Enrollment Emergency Forms
- Meal Counts

Menu Documentation for Day of Review:

- Menus; production records (if applicable); Nutrition Facts labels (including ingredient list) for all whole grain-rich items, yogurts, and cereals served; and Product Formulation Statements and Child Nutrition labels for all commercially prepared products.

PLEASE NOTE...

Note: The due dates mentioned above apply to announced reviews only. Unannounced reviews will receive one checklist upon reviewer's arrival.

Compile and Send Review Documents

Organizations are required to email the program documents listed on the checklist by the communicated due dates.

The HNS Reviewer will acknowledge receipt of the documents and will contact the sponsoring entity if the responses and/or documents are inadequate. At this time, the HNS Reviewer will determine if additional documentation is required. These documents will be requested prior to the on-site portion of the review. The HNS Reviewer will not disclose any findings until the day of the on-site administrative review.

Note: Emailing documents prior to the on-site visit applies to announced reviews only. Unannounced reviews will provide all documents during the on-site visit.



Day of On-Site Review

Prior to the on-site review, the HNS Reviewer will collect the organization's mealtimes from their approved CNPWeb site application(s). If the review has been announced, the HNS Reviewer will work with the organization representative to confirm the location and time of the on-site visit one week prior to the day of on-site administrative review. The HNS Reviewer will observe at least one of the following meals services:

- **BREAKFAST AND/OR;**
- **AM SNACK AND/OR;**
- **LUNCH AND/OR;**
- **PM SNACK AND/OR;**
- **SUPPER**

HNS Reviewer Workspace

The HNS Reviewer will need a quiet and somewhat private workspace to review program documents.

**PLEASE PROVIDE THE
FOLLOWING:**

- **INTERNET ACCESS**
- **ELECTRICAL OUTLETS**
- **TYPICAL LOCATION OF
WHERE THE MAIN
CONTACT WILL BE
WORKING THROUGHOUT
THE DAY IN CASE
QUESTIONS ARISE**

Entrance Conference

Typically, the entrance conference will occur on the day of the on-site administrative review. If the breakfast service is being observed, it may occur after meal service concludes.

The entrance conference gives the organization and HNS Reviewer the opportunity for introductions, a review of the day's agenda, and a time to discuss documents that must be provided.

At a minimum, the organization representative is required to participate in the entrance conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.



Exit Conference

The exit conference will occur at the conclusion of the on-site visit. It will be more formal than the entrance conference because the entire review — including on-site observations, technical assistance, potential fiscal action, and next steps — will be discussed in detail.

At a minimum, the organization representative is required to participate in the exit conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.



Administrative Review Summary Report

The Administrative Review Report is a detailed record of any review findings and technical assistance that occurred during the administrative review. The summary is the Cover Memo to the Administrative Review Report.

Within 30 days of the exit conference, the reviewer will send the Administrative Review Summary and Report to the CACFP Sponsor Representative via email.



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Section Three: Responding to Review Findings



Responding to the Administrative Review Summary

The Designated Official must review the Administrative Review Summary Report and is responsible for ensuring all corrective action and fiscal action are received by the given deadline. Should these post-review actions not be completed by the deadline, it could lead to being declared seriously deficient.



Corrective Action

Corrective action may include written descriptions of changes made within the operation, documentation to demonstrate understanding of program regulations, and/or certificates showing training was completed. A written response must be provided by the deadline indicated in the Administrative Review Summary and Report. The response must be on the organization's letterhead, be signed by an authorized representative listed on the Food Program Permanent Service Agreement (FPPSA) and must address all required corrective action items listed in the report. It is best practice to submit corrective action prior to the deadline in case any revisions are required. The Sponsor Representative will receive a Close-Out Memo when sufficient corrective action is submitted.



Fiscal Action

Some areas of the administrative review are tied to reimbursement funds. During an administrative review, if it is found that reimbursement was paid for non reimbursable meals or that meals were claimed utilizing inaccurate eligibility, fiscal action may be assessed and recovered by direct payment or through future claims.

The Administrative Review Summary and Report will provide the total amount of fiscal action that was assessed due to review findings, if applicable.



Findings that Lead to Fiscal Action

Fiscal action may be taken against any organization that fails to comply with the regulatory requirements for participation in the CACFP. Specifically, findings in the areas of meal counting and claiming and meal pattern may lead to fiscal action.

EXAMPLES OF FINDINGS THAT MAY LEAD TO FISCAL ACTION:

- Claiming meals for a participant not enrolled in the Program
- Meals served with missing components
- Serving high sugar cereal and/or yogurt
- Participants miscategorized on the claiming rosters

Assessing Fiscal Action

Fiscal action is calculated for the entire administrative review by combining the fiscal action of all the review findings. If fiscal action during the administrative review exceeded \$600, funds for fiscal action will be recovered by direct payment or through future claims.

FOR EXAMPLE...

If \$700 of fiscal action was assessed during the administrative review, this means ADE would recover a total of \$700 from the organization after all CNPs being operated have been reviewed.

Fiscal Action Disregard

If the total sum of CACFP fiscal action is less than \$600, it is disregarded, and the funds are not recovered.

FOR EXAMPLE...

If if \$100 of fiscal action for a missing component was calculated during the menu portion of the administrative review and \$300 of fiscal action was calculated for incorrect eligibility during the rest of the administrative review, ADE will disregard the total \$400 fiscal action.

Quiz Time

Is the administrative review closed the day of the on-site visit?

- A** Yes, you will never discuss the administrative review again.
- B** Yes, the HNS Reviewer will provide the Close-Out Memo once all findings are discussed.
- C** No, the review is not considered closed until adequate responses for all corrective actions are received and the Close-Out Memo is issued by the HNS



Quiz Time

Is the administrative review closed the day of the on-site visit?

- A** Yes, you will never discuss the administrative review again.
- B** Yes, the HNS Reviewer will provide the Close-Out Memo once all findings are discussed.
- C** No, the review is not considered closed until adequate responses for all corrective actions are received and the Close-Out Memo is issued by the HNS

A written summary of the review findings, technical assistance provided during the review, and the required corrective action will be sent via email once the review is complete. The review is not considered “closed” until the Close-Out Memo is issued.



Quiz Time

1 True or False: Serving yogurt and cereal that does not meet the sugar requirement will result in fiscal action.

A True

B False

2 True or False: Failure to comply with program requirements or failure to implement required corrective action assigned after the administrative review will result in the organization being declared Seriously Deficient.

A Yes

B No



Quiz Time

- 1 True or False: Serving yogurt and cereal that does not meet the sugar requirement will result in fiscal action.

A True

B False

Fiscal action will be assessed based on all review findings and the review will result in fiscal action if administrative review findings exceed the \$600 threshold.

- 2 True or False: Failure to comply with program requirements or failure to implement required corrective action assigned after the administrative review will result in the sponsoring entity being declared Seriously Deficient.

A True

B False

Any findings violating compliance with program requirements must be resolved and sufficient corrective action must be submitted by the due date provided by the HNS Reviewer, or the organization will be declared seriously deficient..





Congratulations

You have completed the Online Course:
**What to Expect: Child and Adult Care Food
Program Administrative Review**

**To request a certificate, please go to the next
slide.**

**Training Title: What to Expect: Child and Adult
Care Food Program Administrative Review
Length: 30 minutes**

Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.

Certificate

Requesting a training certificate:
Please click the button to
complete a brief survey about
this online training. Once the
survey is complete, you will be
able to print your certificate of
completion from Survey Monkey.

[Take Survey](#)



The information below is for your reference when completing the survey:

- **Training Title: What to Expect: Child and Adult Care Food Program Administrative Review**
- **Length: 30 minutes**

Please note, attendees must document the amount of training hours indicated on the training despite the amount of time it takes to complete it.





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1. **Mail:** U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410;
2. **Fax:** (202) 690-7442; or
3. **Email:** program.intake@usda.gov.

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