

CACFP New Sponsor Training

Online Course Workbook



pennsylvania
DEPARTMENT OF EDUCATION

Sponsored by the Pennsylvania Department of Education

Introduction

This workbook supplements the online training “Child and Adult Care Food Program (CACFP).” This training is offered by the Pennsylvania Department of Education.

OVERVIEW OF LESSONS

Lesson 0: Course Overview

Lesson 1: Civil Rights Training

Lesson 2, Topic 1: Meal Service Planning

Lesson 2, Topic 2: Meal Components and Patterns

Lesson 3, Topic 1: Documenting Institution and Facility Eligibility

Lesson 3, Topic 2: Participant Eligibility

Lesson 3, Topic 3: Meal Counting and Documentation

Lesson 3, Topic 4: Miscellaneous Recordkeeping

Lesson 4: Financial Management, Documentation, and Responsibilities

Lesson 5: Maintaining a Nonprofit Food Service Program

Lesson 6: Program Oversight

Lesson 0



By the end of this lesson, you will be able to...

1. Recognize eligible participants in the CACFP.
2. Identify the programs that are eligible to participate in the CACFP.
3. Become familiar with contracting as a method for providing meals.
4. Recall the three CACFP Performance Standards.



THE TOP 3 LIST...

Take a few minutes to write down the top three reasons you decided to become a sponsor for the Child and Adult Care Food Program. Put a star next to the one that is the most important to you.

1. _____

2. _____

3. _____



eLearning Recommendations

The eLearning course has been divided into lessons that address specific parts of the responsibilities of CACFP institutions. For example, first part of the second lesson, Menu Service Planning, will benefit the staff responsible for developing the menu and ensuring that all meals comply with meal regulations.

The responsible financial staff or accountant should complete the financial sections:

- Lesson 4 – Financial Management, Documentation and Responsibilities
- Lesson 5 – Maintaining a Non-Profit Food Service Program

Since all institutions are required to comply with all regulations, executive directors and department heads of nonprofit agencies, and the owners and board officers of proprietary centers must review the entire course. They are ultimately responsible for the management of the CACFP.

Owners, center directors, or department heads for new institutions must successfully pass all sections to be approved to participate in the CACFP. Each institution should create a log-on account at the institution level. While individuals may create and complete or review only portions of the course, the institution's log-on account will be the official one used by the state agency for approval purposes.

Institutions assigned to complete all or specific sections of this course as part of their corrective action process should follow the instructions provided by the state agency.



REMEMBER THIS

- Eligible participants in the CACFP include children through the age of 12, adults over 60, children through 18 participating in the afterschool care meals program or residing in emergency shelters, and individuals with special needs.
- Eligible CACFP programs include public or private non-profit or for-profit child and adult care centers, Head Start programs, afterschool care centers, day care homes, and emergency shelters.
- CACFP sponsors have the option to contract with school food authorities or food service management companies in order to provide vended meals for eligible participants.
- CACFP sponsors must meet and maintain the three performance standards of financial viability and financial management, administrative capability, and program accountability.

Lesson 1



By the end of this lesson, you will be able to answer...

1. What are civil rights?
2. Who is required to have civil rights training?
3. Why are civil rights important?
4. What are your responsibilities?

Definitions

Civil Rights

The rights of individuals to receive equal treatment and to be free from unfair treatment or discrimination. These rights are guaranteed to all U.S. citizens by the 13th and 14th amendments to the constitution and by multiple acts of congress over several decades.

Discrimination

Different treatment that makes a distinction of one person or group of persons from others, by neglect, or by the actions or lack of actions from a program.

Defining Discrimination

1. The act of distinguishing one person or a group of people from others, either intentionally, or through neglect, or by the effect of actions or lack of actions based on the protected classes.
2. Showing disparaging treatment by treated an individual or group because they belong to a protected class, intentionally or through policies or practices.
3. Creating disparaging impact on a protected class resulting in unintentional consequences.
4. Showing reprisal or retaliation through negative treatment due to civil rights activity of an individual or related parties cooperating in an investigation.



The Four Ds Test

The 4Ds test is used to help you determine if a procedure or practice constitutes a civil rights violation. Fill in the blanks below to complete each question.

1. _____ benefits or services that others received?
2. _____ in receiving benefits or services that others received?
3. Treated _____ than others, to their disadvantage?
4. Given _____ treatment that is, something that does not seem discriminatory, but has a discriminatory impact in practice?



Six Protected Classes

What are the six protected classes? Fill in the blanks below.

_____ race _____	_____
_____ color _____	_____
_____	_____



Your Responsibilities as a Sponsor

- Assurances
- Collection and Use of Data
- Effective Public Notification Systems
- Complaint Procedures
- Compliance Review Techniques
- Resolution of Noncompliance
- Requirements for Reasonable Accommodations of Persons with Disabilities
- Requirements of Language Assistance
- Conflict Resolution
- Customer Service



Where to include the Full and Short Versions of the Nondiscrimination Statement

Full:

Printed Materials
Websites

Short:

Document of one page or less
Novelty Items



Civil Rights Compliant Checklist

The following items should be included in a Civil Rights Complaint.

- The name, address, and phone number of the complainant
- The name and location of sponsor
- Description of the discriminatory action
- Basis of the discrimination
- People who are likely to know about the alleged discrimination
- Date



MUST DO LIST

- No discrimination
- Confidentiality
- Civil rights training
- Complaint procedure
- “And Justice for All” poster
- Non-discrimination statement
- Data collection
- Benefits and services to all who are eligible

*For more civil rights information, see appendix.

Lesson 2, Topic 1



By the end of this lesson, you will be able to...

1. Understand meal service requirements in the CACFP.
2. Identify special dietary requirements in the CACFP.
3. Summarize CACFP menu planning basics.



REMEMBER THIS

- CACFP facilities need to plan to provide one meal per child or adult for each approved meal type. The meal types are breakfast, lunch, supper, and snack.
- The number of meals, or meals and snacks that can be served to participants vary based on the type of program.
- Sponsors must select the meals to be served at each site, and have them approved in [online system].
- Sponsors are required to make modifications to menus when a physician declares a special dietary need that results in a disability for a participant.
- Meals should be enjoyable as well as nutritious. Consider eye appeal, variety and the age of the children you'll be serving when planning your menus.

Lesson 2, Topic 2



By the end of this lesson, you will be able to...

1. Recognize the standard meal pattern requirements for the CACFP.
2. Identify the minimum quantities of the required food components by age group.



REMEMBER THIS

- Getting to know the meal patterns and components will help you plan well-balanced, nutritious meals and snacks to meet the nutrient and energy needs of the children or adults in your care.
- The CACFP meal pattern for breakfast requires fluid milk, a bread or grain product, and a fruit or vegetable.
- For snacks, choose two of the four components of fluid milk, a bread or grain product, a fruit or vegetable, or a meat or meat alternate.
- The CACFP meal pattern for lunch and supper requires fluid milk, two servings of fruits and vegetables, a meat or meat alternate, and a bread or grain serving.

**The CACFP meal pattern requires that the fluid milk served to participants age two and older be 1% or skim milk. Water also should be available throughout the day for participants.*

Lesson 3, Topic 1



By the end of this lesson, you will be able to...

1. Recognize the standard meal pattern requirements for the CACFP.
2. Identify the minimum quantities of the required food components by age group.



Activity: Calculate 25%

Determine the number of participants who need to be receiving subsidized benefits, or be eligible for free or reduced price meals, in order for facilities sponsored by forprofit organizations to qualify for the CACFP. Use the space provided to work out your answer.

Use the smaller number to complete the equation.

1. License capacity _____

Participant enrollment _____

_____ x 0.25 = _____
smaller number participants needed
to meet criteria

2. License capacity _____

Participant enrollment _____

_____ x 0.25 = _____
smaller number participants needed
to meet criteria

3. License capacity _____

Participant enrollment _____

_____ x 0.25 = _____
smaller number participants needed
to meet criteria



REMEMBER THIS

- Next to caring for participants, recordkeeping is your most important task.
- The first level of eligibility involves determining that the agency, referred to as an institution or sponsor, applying to participate meets eligibility requirements.
- In addition to determining an institution's eligibility, all site facilities participating in the CACFP also have to meet eligibility requirements.

Lesson 3, Topic 2



By the end of this lesson, you will be able to...

1. Identify the records that must be collected and maintained for participants in the CACFP.



REMEMBER THIS

- The records required to document participant eligibility include enrollment forms, meal benefit income eligibility applications, and documentation showing that centers have met area eligibility requirements.
- Specific required fields on the meal benefit income eligibility applications need to be completed by all households of participants in care.
- After the meal benefit income eligibility application is completed and returned to the institution, institutions need to determine the eligibility category for meals served.

Lesson 3, Topic 3



By the end of this lesson, you will be able to...

1. Identify the records required to support meals claimed for CACFP reimbursement.



REMEMBER THIS

- The required meal documentation includes attendance records, meal counts, and menus.
- Meal counts and attendance require two separate counts.
- You can't use meal counts to calculate attendance, and you can't use attendance records to calculate meal counts.

Lesson 3, Topic 4



By the end of this lesson, you will be able to...

1. Identify the various miscellaneous records that must be maintained to document CACFP compliance.



REMEMBER THIS

- Training documentation has to show that all key staff have received annual training on all required training topics, or for all topics that apply to their assigned CACFP duties.
- Sponsors need to complete edit checks to ensure that only approved meal types are claimed and that no more than the maximum number of meals have been served to each eligible participant each day.
- All records must be available for administrative reviews, announced or unannounced, and maintained for three years plus the current fiscal year. Permanent records must always be on file.

Lesson 4



By the end of this lesson, you will be able to...

1. Understand the key elements of an effective financial management system.
2. Identify expenditures that are claimed as operating costs.
3. Identify expenditures that are claimed as administrative costs.
4. Recognize the limits and conditions that impact allowable costs.
5. Understand how claims are compiled, submitted and paid.



Costs Requiring Additional Approvals

Approval for Costs in the CACFP

All expenses/costs claimed by institutions participating in the Child and Adult Care Food Program (CACFP) must be approved prior to being incurred. Generally, most costs are approved through the annual budget process, and subsequent budget amendments. However, some costs require additional levels of approval in order to be paid through CACFP funds.

Costs requiring “Specific Prior Written Approval” are those identified by USDA that require the individual line item approval by the state agency. This approval must be in writing and must be for a specific cost. For example, the state agency can approve a line item for travel that includes monitors mileage, staff travel to conduct training sessions, or travel to deliver food to sites. However, conference travel cannot be included in the travel line item and must receive additional approval from the state agency.

In some cases, the state agency’s approval is not the last step of the approval process. There are costs that require USDA Regional Office approval. The attached chart identifies costs where Specific Written Approval and USDA approval is required. For additional information, institutions should refer to the Financial Management Instruction 796-2, Rev. 4.



Administrative Costs

All administrative costs are divided into four categories:

1. Salaries
2. Office supplies and related support expenses
3. Travel for administrative staff and monitors
4. A general "other cost" category

In the salaries category, you'll find the salaries, wages and benefits for the director and assistant director as well as any clerical and financial support and monitoring staff. In the office supplies and support expenses category, you'll find costs for renting offices, office equipment, office supplies, telephones and internet services, and costs to print any forms used in the program. The travel for administrative staff and monitors category includes vehicle costs, tolls, parking, costs to attend training and any mileage reimbursement.

Here a few examples of what you might include as other administrative costs in the "other costs" category:

- Contracted accounting
- Audits
- Maintenance agreements for equipment

These lists are just examples and they're not intended to be exhaustive. If you're ever unsure about whether a cost is allowable, or if it's an administrative or operating cost, just contact your state agency to clear it up.



Operating Costs

There are five categories for operating costs:

1. Food and related costs
2. Supplies and labor
3. Food preparation facility expenses
4. Food delivery
5. The general other cost category

Let's look at each category:

- Food and related costs include the actual meals you serve – vended or self-prepared.
- In the supplies and labor category, you'll find non-food supplies; salaries, wages and benefits for the staff overseeing the meal service and food preparation staff; and vendor costs.
- The facility expenses category relates to food preparation.
- The food delivery category is where you'll report your delivery costs for food.
- The general other cost category may include food preparation equipment under the threshold where equipment must be depreciated, or other miscellaneous costs relating to food preparation.

You need to make sure your vendor costs are well-documented. As far as operating costs go, your daily meal counts, attendance, delivery slips, and monitoring reports will be the best basis for validating your vendor contract costs.



2016-2017 Reimbursement Rates

The following rates of reimbursement are effective July 1, 2016, through June 30, 2017.

Rates per meals served in adult day care centers and child care centers

	Breakfast	Lunch/Supper	Snacks
Paid	\$0.29	\$0.30	\$0.07
Reduced	\$1.41	\$2.76	\$0.43
Free	\$1.71	\$3.16	\$0.86

The cash-in-lieu value of commodities for FY 2017 is \$0.23. Cash-in-lieu only applies to lunch and supper meals.

Rates for At-Risk Afterschool Meals

	Breakfast	Lunch/Supper	Snacks
Free	\$1.71	\$3.16	\$0.86

The cash-in-lieu value of commodities for FY 2017 is \$0.23.

Rates per meals served in day care homes

	Breakfast	Lunch/Supper	Snacks
Tier 1	\$1.31	\$2.46	\$0.73
Tier 2	\$0.48	\$1.49	\$0.20

Administrative rates for sponsoring organizations of day care homes (per home per month)

Initial 50 Day Care Homes (1 through 50)	\$112.00
Next 150 Day Care Homes (51 through 200)	\$86.00
Next 800 Day Care Homes (201 through 1000)	\$67.00
Additional Day Care Homes (1001 and over)	\$59.00



REMEMBER THIS

- In order for costs to be allowable, they must be reasonable and necessary and directly related to the CACFP.
- Financial management systems safeguard CACFP funds against unauthorized or unallowable use.
- Operating costs include the costs necessary to buy, prepare, and serve eligible meals to enrolled, eligible participants.
- Administrative costs are costs related to planning, organizing and managing the CACFP.
- 15% of the reimbursement center-based institutions receive for meals served may be retained to cover administrative costs.
- The claim for reimbursement summarizes meal counts and attendance records and requests reimbursement from the state agency.

Lesson 5



By the end of this lesson, you will be able to...

1. Clarify what is meant by “nonprofit food service program.”
2. Understand how a nonprofit food service program is determined.
3. Identify the records required to document the nonprofit food service program.
4. Understand what to expect if the nonprofit food service program can't be documented.



REMEMBER THIS

- Organizations can't make a profit from the operation of the CACFP or use CACFP reimbursement to benefit the general profits of the organization.
- All program reimbursement funds must be used principally for the CACFP, to operate or improve the food service.
- The most important documentation needed to determine the nonprofit status of your food service program includes all revenues and expenses.
- Excess fund balances must be expended to improve meal quality or expand CACFP access and institutions must receive specific prior written approval before utilizing excess funds.

Lesson 6



By the end of this lesson, you will be able to...

1. Distinguish between the various levels of program oversight in the CACFP.
2. Determine when monitoring is required by sponsors of sites participating in the CACFP.
3. Identify the factors involved in determining a serious deficiency.
4. Understand how a serious deficiency impacts CACFP participation.



REMEMBER THIS

- The four levels of program oversight include the review of applications and claim documentation, administrative reviews, audits and management evaluations.
- Program oversight begins with sponsor staff, who make sure both independent sites and sponsored sites are keeping the required records and documentation and following CACFP regulations.
- When an individual or institution is unwilling or unable to correct problems found that seriously open the program to administrative or financial mismanagement, it's called a serious deficiency.
- Once a Serious Deficiency Notice is issued, there are only two possible outcomes: either it's corrected and the notice is temporarily deferred or it's not corrected and the state agency issues the Notice of Proposed Termination and Disqualification.
- Multifaceted program oversight is designed to help you and all program participants remain in compliance and operate successful Child and Adult Care Food Programs.

Notes

Appendix

Equal **Opportunity**

for Faith-Based and/or Community Based Religious Affiliations

Faith-Based and Community-Based Religious Affiliation – Ensures that no organization will be discriminated against based on religion, and USDA funded programs are available regardless of religious affiliation. Specifically prohibits discrimination for or against an organization:

- On the basis of religious belief, practice or character
- By allowing independence to carry out mission of the religious as long as USDA funding is not use to support any inherently religious activities, part of the worship or religious instruction
- Allowing use of USDA funds in spaces without removal of religious icons, scriptures or other religious symbols
- By disallowing the organization to discriminate against program participants or beneficiaries on the basis of their religious belief or non-belief



for Participating Institutions, Facilities and their Staff

1. Assurances to Protect Civil Rights
2. Public Notification of Available Benefits through Outreach and Education
3. Use of Nondiscrimination Statements

- a. Complete Nondiscrimination Statement on all program materials, handbooks, enrollment forms, menus, newsletters, brochures, parent/household information, flyers and advertisements

"In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339.

Additionally, program information may be made available in languages other than English. To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

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

- b. Abbreviated Nondiscrimination Statement on websites, radio, TV public service announcements and items too small to include the complete statement.

"This institution is an equal opportunity provider."

4. Data Collection and Reporting for Ethnicity and Race
5. Complaint Procedures and Conflict Resolution
6. Accommodations for Protected Classes
7. Compliance Reviews



Protected Classes

1. Race 2. Color 3. Sex 4. Age 5. National Origin 6. Disability

Although not a specified class, Religious Affiliation is also protected.

1. Race: The five racial categories are:

- American Indian or Alaskan Native – A person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment or identity.
- Asian – A person having origins in any of the original peoples of the Far East, Southeast Asia, or Indian subcontinent, including Cambodia, China, India, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand and Vietnam
- Black or African American – A person having origins in any of the black racial groups of Africa. Terms such as Haitian or Negro can also be used in addition to Black or African American
- Native Hawaiian or Other Pacific Islander – A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands
- White or Caucasian – A person having origins in any of the original peoples of Europe, the Middle East or North Africa

2. Color: To have its commonly understood meaning – pigmentation, complexion, or skin shade or tone. Thus, color discrimination occurs when a person is discriminated against based on the lightness, darkness, or other color characteristic of the person.

3. Sex: Gender identity, including transgender status, or because of sexual orientation

4. Age: A time of life when specific characteristics or particular qualification, power or capacity arises.

5. Nation Origin: Pertaining to the country of birth or descent, most closely associated with ethnicity.

The two ethnic categories are:

- Hispanic or Latino – A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term Spanish origin can be used in addition to Hispanic and Latino.
- Non-Hispanic or Latino – All others not have culture or origin as listed above regardless of race.

6. Disability: Physical or mental impairment that substantially limits one or more major life activities.

“Major life activity” refers to functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working. More specifically, according to the ADA Amendments Act of 2008, it refers to “functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, cardiovascular, endocrine, and reproductive functions.”



Accommodating Language Assistance for Limited English Proficient Individuals

Limited English Proficiency – Individual or households where English is not the primary language spoken, and have limited ability to read, speak, write or comprehend English.

Through use of the documents available from USDA, LEP participants can complete the required documents to participate in the Child Nutrition Programs. These documents can be found at: <http://www.fns.usda.gov/documents-available-other-languages>.

Additionally, institutions and facilities are encouraged to use the “I Speak” chart, found at <http://www.fns.usda.gov/sites/default/files/lspeak.pdf> to assist in determining the appropriate language.

Primary factors to consider in Determining Reasonable Steps to accommodate LEP:

- Number of LEP persons participating in the program.
- Frequency with which LEP individuals have contact with the program.
- Nature and importance of the program provided.
- Resources available to the participant such as translator, materials, costs

Ways to Accommodate LEP households

- Language Assistance Services
- Oral interpretation services
- Bilingual staff
- Telephone interpreter lines
- Written language services
- Community volunteers
- School officials

Tips

- Never use children as interpreters
- Share the resources – enlist assistance from community-based organizations
- Always stress confidentiality regardless of who works with you
- Visit www.LEP.gov for additional resources



Accommodating Disabilities

All children and adults must be allowed equal opportunity to participate in CACFP.

All participants must be treated in the same manner, including:

- Provided services
- Seating arrangements
- Facility access
- Methods of serving meals

Institutions are expected to provide reasonable accommodations that respect the dignity of all participants.

Special Dietary Needs

USDA regulations require that agencies make substitutions or modifications in meals for persons whose disabilities restrict their diet. This need must be certified by a physician or another state recognized medical authority, defined as a licensed health care professional authorized to write medical prescriptions under state law.

The request must state if the request is due to an allergy or an intolerance, specify the food items to be avoided and acceptable food substitutions. The meal should be of equal acceptability to the participant. If it is an intolerance, accommodation is not required but recommended. However, you cannot choose to accommodate some and not all requests for food substitutions not originating as a food allergy. Component substitutions for intolerances or parent's requests that include non-creditable foods or where the meal no longer contains all required components are not allowed to be claimed.

Special dietary needs, like all medical conditions, are to be confidential. However, care must be taken to ensure those preparing food, serving food and overseeing the meal service are fully aware of the concern to ensure the safety of the participant.

Sponsors and facilities should contact the state agency for assistance if there are questions or concerns implementing special dietary needs.



Processing a Civil Rights Complaint

Regardless of the legitimacy of the complaint, all allegations must be treated as a civil rights complaint until the concern is investigated and, if determined to be a civil rights complaint, it is resolved. This is not to say all concerns should not be addressed, but the handling of Civil Rights complaints require specific steps. Other complaints may be a form of unequal treatment that do not fall under the specific protected classes.

1. Whenever possible, civil rights complaints should be resolved locally, and involvement of the state agency should only require notice of the complaint and action taken to be resolved. However, if this is not possible, the state agency and the USDA will assist in its resolution.
2. A complaint may be a telephone call, letter, email, fax or other means of communication. They may be signed or anonymous. But either way, upon receipt, a facility must log the complaint and notify the state agency.
3. In order to investigate the complaint, the person responsible for handling civil rights complaints must contact the complainant determine what the different treatment is, whether or not it falls under one of the protected classes, and the effect it has on receiving equal access to program benefits. This includes:
 - a. Interviewing the complainant;
 - b. Interviewing others who have similar complaint, if applicable;
 - c. Interviewing local authorities or allegedly responsible for the action or lack of action resulting in the civil rights complaint;
 - d. Interviewing all witnesses to the actions or lack of actions resulting in the civil rights complaint;
4. If the complaint is determined to have substance, the responsible person must determine what actions can be taken to resolve the concern, including cautioning the authorities or persons responsible for the action or lack of action resulting in the violation the retaliation is furtherance of the civil rights complaint.
5. If resolved, a complete report to the state agency and USDA must be filed and the log must be updated. If unable to resolve the issue, the complaint must be forwarded to USDA.
6. To prevent recurrence, the sponsor and state agency should conduct training with facility staff but keep the specific of the complaint confidential.