

## Child and Adult Care Food Program Site Monitoring

### Head Start Performance Standard

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§ 1302.44 (a)

CACFP Policy & Procedure Manual Chapter 13 Section B

#### Policy

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The Head Start CACFP Supervisor and all other designated CACFP monitors must conduct regular reviews at all CACFP sites to determine compliance with CACFP meal patterns, record keeping, and other CACFP requirements. Site reviews are conducted using the **Site Monitoring Report for CACFP**. Monitoring reports and any additional follow-up will be kept on file for three years.

At a minimum, each site must have a monitoring review three (3) times within a year, with no more than six (6) months between reviews. Two of the three reviews must be unannounced, and one unannounced review must include a meal observation at meal service. Head Start CACFP monitors must vary the timing of unannounced reviews, so they are unpredictable to facilities.

Site staff may not conduct their own site reviews. Sponsors must thoroughly train site monitors to CACFP requirements. All training must be documented, and training records must be kept on file.

#### Extended and Unexpected Site Closures:

If a site must close for an extended period, efforts will be made to conduct all outstanding site monitoring visits prior to the closing. If all visits cannot be conducted before the closing, they must be conducted when the site reopens and must be before the CACFP fiscal year ends.

#### Procedures

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Site monitoring reviews must include a review of the following records and/or observations and must be documented on the Site Monitoring Report for CACFP. The report must show the date and location of the site review, the meal observed, what was assessed, problems observed, corrective actions required, any training that was provided, along with any follow up actions.

Any issues of non-compliance during site monitoring must be followed up on to ensure they have been corrected. The Site Monitoring report must note the time frame for any required follow-up.

#### Records to be documented:

- Meal components
- Mealtimes
- Portion sizes
- Meal service style
- Meal count procedures
- Food safety and sanitation
- Health and safety violations
- Daily attendance records
- Five-day reconciliation

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- Menus
- Food Substitution Forms kept on file in classroom
- Infant menu records, if applicable
- CACFP and Civil Rights Posters (*Building for the Future* flyer, *And Justice For All* poster)
- Refrigerator temperature log
- Civil Rights binder
- Vendor Receipts

Any problems of non-compliance findings during a site monitoring review must be followed up to ensure they have been corrected. Sites are required to correct the action within two weeks of notification.

The CACFP Supervisor and other CACFP monitors are required to review all meal service types throughout the year. The percentage of all reviews at the mealtimes should be roughly proportional to the percentage of each meal type claimed.

Example: If 20% of the meals claimed by a sponsor in the prior year were breakfast, they are required to conduct roughly 20% of site monitoring visits at breakfast.

### Five-Day Reconciliation

Part of the site monitoring review includes a review of five consecutive operating day's records for the current or previous month to determine whether meal counts are accurate based on attendance for a five-day period. Five-day reconciliation is used to highlight problems in claiming procedures. The CACFP Supervisor must use the last five days of service, or the last five days of the prior calendar month when conducting the five-day reconciliation. The day of the review will not be used as one of the test days.

All sites:

- Disallow any meals claimed that are not supported by attendance records
- Document all meals disallowed and required corrective actions on the Site Monitoring Report. All follow-up and corrective action taken must be documented and kept on file.
- Notify PAS, teachers and teachers' aides if meal disallows are found. Retrain staff as needed. Meal disallows are not to be included in the monthly reimbursement claim

### Vendor Contracts

For the sites that purchase meals from vendors (School Districts) the CACFP supervisor will check that vended meals at each site comply with all CACFP requirements and that they are consistent with the Vended Meal Agreement. Vendor receipts will also be evaluated for completeness and accuracy, and the Classroom Aide and Supervising Teacher will be notified of any inaccuracies. Re-training will be conducted as needed.

### Civil Rights

Civil Rights compliance must be checked during monitoring. The CACFP Supervisor or CACFP monitor must note any problems observed and implement and maintain effective corrective action.

### New Site Visits

The CACFP supervisor will collaborate with the Compliance Supervisor to conduct pre-site visits. Pre-site visits will be conducted prior to the first day the children are present at the site.

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### **Desk Audits**

Site visits may be conducted via desk audit as opposed to in-person visits as outlined in the USDA Child Nutrition Waiver. Desk audits will be utilized when in-person site visits are not possible due to stable groups and limited classroom visitors, or as needed as determined by the CACFP Supervisor.

An “unannounced” desk audit is defined as a visit that is not announced to classroom staff. The Program Area Supervisors and any other supervisory staff will be notified as needed.

#### **Desk audit requirements:**

- Attendance and meal count will be audited via ChildPlus
- Meal observations will be noted as “not observed”
- Verbal confirmation will be requested for the “Building for the Future” and “Civil Rights” sections of the Site Monitoring report, or will be marked as “not observed”

### **Health and Safety Violations**

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CACFP monitors do not routinely assess health and safety issues during onsite reviews, they will be trained to recognize conditions that pose an immediate threat to the health and safety of the children and staff. Regulations require sponsors to notify appropriate licensing or health authorities if any of the following were to be identified during a site visit:

- A missing or lost child, or a child that was left unsupervised
- Suspected maltreatment of a participant
- Suspected sexual, physical, or emotional abuse of a participant
- Injuries to participants requiring medical or dental care
- Illness or injuries requiring hospitalization or emergency treatment
- Death of a participant and/or staff member
- The presence of a threatening individual who attempts or succeeds to enter the facility

Non-life-threatening health and safety violations will be reported to the respective PAS, and additional follow up may be needed.