The banner features two logos at the top left: the Idaho State Department of Education logo and the Idaho Child Nutrition Program logo. The main title is "Idaho Child and Adult Care Food Program Annual Mandatory Training" in white text on a purple background. Below the title, the dates "August 2, 6, 8, and 10 – 2018", time "9:00 am – 3:00 pm", and locations "Boise, Idaho Falls and Coeur d'Alene" are listed. The coordinator's name, "Kim Huntley", and title, "Child and Adult Care Food Program Coordinator", are also included. The background of the banner shows a photograph of an elderly man smiling at a young child. At the bottom left, there is a grey box with the text "Supporting Schools and Students to Achieve" and "SHERRI YBARRA, ED.S., SUPERINTENDENT OF PUBLIC INSTRUCTION".

**Idaho Child and Adult Care Food Program
Annual Mandatory Training**

August 2, 6, 8, and 10 – 2018
9:00 am – 3:00 pm
Boise, Idaho Falls and Coeur d'Alene

Kim Huntley
Child and Adult Care Food Program Coordinator

Supporting Schools and Students to Achieve
SHERRI YBARRA, ED.S., SUPERINTENDENT OF PUBLIC INSTRUCTION

Welcome to this annual CACFP training for Institutions currently participating on the Program.

My name is Kim Huntley, the CACFP Coordinator at Idaho State Department of Education

DO: Confirm participants have signed their names on the sign-in sheet(s), and they have all necessary materials for this training (i.e. Participant's packet, pens and calendar posters, CACFP note pad and "And Justice for All" posters). CACFP banner should be set up.

Housekeeping



- Restroom location
- Breaks
- Bike rack for questions
- Overview of participants packet



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it is important that we create an environment that allows everyone to participate freely and work together to accomplish the training objectives without fear of criticism. To accomplish this goal, let's review some housekeeping items and ground rules for today's training.

- First, the location of the restrooms is located (state where) and water service available in training room.
- We will take a few breaks during this training and a one hour lunch from approximately 12:00 – 1:00 pm. Of course, please be sure to return on time, as starting and ending breaks on time will allow us to cover all the training information and activities within the time allotted.
- Although I will try to answer questions throughout the training, sometimes a question requires research or a longer answer than time allows. Because your questions are important, I posted a “Bike Rack” flip chart. Feel free to write any questions on a sticky note and post it to the “Bike Rack.” I will aim to provide answer to all questions during the class but may need to take back for clarification and answer from USDA.

Ground Rules



- Be a team player
- Be respectful of everyone
- Share ideas with the class
- Be on time for all sessions
- Stand up when your mind goes on vacation
- Always ask for clarification if you do not understand
- Turn your mind on and your electronic devices to silent or off



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SAY:

Some ground rules for today's training include:

- Be a team player.
- Be respectful of everyone.
- Share ideas with the class.
- Be on time for all sessions.

Additionally, it is ok to stand up when your mind goes on vacation and always ask for clarification if you do not understand. Finally, turn your mind on and your electronic devices (cell phones) to silent or off. If you need to take a call please step out of the room into the lobby or hall so you don't interrupt the class.

Training Topics



- Topic 1: Budget Process and Requirements
- Topic 2: Procurement and Contract Requirements
- Topic 3: Monitoring Requirements
- Topic 4: Serious Deficiency Process
- Topic 5: Administrative Review Procedures (appeals)
- Topic 6: Civil Rights and Meal Accommodations

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This year the annual training is only 5 hours but we have several topics to cover in this time. The following are the topics we will cover today.

- Topic 1: Budget Process and Requirements
- Topic 2: Procurement and Contract Requirements
- Topic 3: Monitoring Requirements
- Topic 4: Serious Deficiency Process
- Topic 5: Administrative Review Procedures (appeals)
- Topic 6: Civil Rights and Meal Accommodations

Training Topics



Topic 7: USDA Updates and Resources

Topic 8: Common Findings on Program Reviews

Topic 9: Menu Record Requirements

Topic 10: Menu Record Activities

Topic 11: Tour of CNP Website



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Just before lunch and after we will cover these topics:

Topic 7: USDA Updates and Resources

Topic 8: Common Findings on Program Reviews

Topic 9: Menu Records Requirements

Topic 10: Menu Record Activities

Topic 11: Tour of CNP Website

Budget Process and Requirements



Let's get started. Our first topic is the budget process and requirements. All Institutions – Independent Centers, Sponsoring Organization of Centers and Sponsoring Organization of Day Care Homes are required to complete an annual budget. The only exception is School Food Authorities (SFA's) that only participate in the At-risk afterschool program and are in good standing in NSLP. Even though some of the SFA's present are not required to complete budgets at this time this information is valuable when maintaining your food service budget. In addition, some SFA's have expanded services in CACFP by adding child care or Head Start sites which then required the SFA to submit a CACFP budget to the state agency.

We will start first with a few definitions.

Budget Process and Requirements



Nonprofit Food Service

All food service operations conducted by the institution principally for the benefit of enrolled participants, from which all of the Program reimbursement funds are used solely for the operations or improvement of such food service.

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You may be wondering why CACFP Institutions are required by program regulations to maintain budgets and records of expenditures and revenues. All Institutions are required by 7CFR 226 to maintain a nonprofit food service operation. Here is the definition: *All food service operations conducted by the institution principally for the benefit of enrolled participants, from which all of the Program reimbursement funds are used solely for the operations or improvement of such food service.*

In general terms, the Institution must maintain records to support that all CACFP reimbursement is used solely for allowable program operation and administrative costs. In addition to the program regulations 7 CFR 226 the Institution must follow FNS 796-2 revision 4 guidance (Financial Management in CACFP) and 2 CFR part 200 subpart D.

Budget Process and Requirements



Allowable Costs

Bona fide obligations of the institution incurred for the actual operation and administration of the Program. All allowable costs require either prior or specific prior written approval by the State agency.

Costs must be necessary, reasonable, allowable and appropriately documented

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What are allowable costs? The term from FNS 796-2 revision 4 is:

Bona fide obligations of the institution incurred for the actual operation and administration of the Program. All allowable costs require either prior or specific prior written approval by the State agency.

Overall, ***Cost must be necessary, reasonable, allowable and appropriately documented.***

To receive prior or specific prior written approval of operation and administrative expenses before they are incurred the Institution must submit a budget for approval to the state agency. This includes budget amendments for expenses that were not included in the original budget. An ordinary allowable expense is unallowable if the expense is not included in the approved budget prior to incurring the expense.

Budget Process and Requirements



Financial Viability

An institution must demonstrate that it has adequate financial resources to operate and administer the CACFP on a daily basis, has adequate sources of funds to continue to pay expenses during temporary interruptions in Program payments and/or pay debts when fiscal claims have been assessed.

Examples of fiscal claims: Over claim or unallowable expenses

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An institution must be financially viable. Based on Program regulations an institution must demonstrate that it has adequate financial resources to operate and administer the CACFP on a daily basis, has adequate sources of funds to continue to pay expenses during temporary interruptions in Program payments and/or pay debts when fiscal claims have been assessed. Examples of fiscal claims would be an over claim verified by the state agency during a program review or an unallowable expense claimed for Program reimbursements.

Each of the terms we just covered are why annual budgets and expenditure/revenue reports are required and important documents in CACFP.

Budget Process and Requirements



Annual Budget Process for CACFP

- April State Agency issues budget workbook
- June 1 Independent Centers (IC) and Sponsoring Organization of Center (SOC) budget workbooks due to State agency
- August 1 Sponsoring Organization of Day Care Homes (SODCH) budget workbooks due to State agency

➤ Note: CACFP Fiscal year is October 1 – September 30

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The first step in the annual budget process begins in April. SDE will distribute the next fiscal year (FY) budget workbook to all program contacts and executive director by the first week of April. The workbook is sent through the SDE broadcast email system which limits who the workbook may be sent to in each Institution. It is important if the Program Contact or Executive Director are not the individual in your Institution to complete the work book, to forward the workbook to the correct individual.

CACFP program year begins October 1 and runs through September 30. The budget process begins early so Institutions may plan ahead, complete the workbook and receive SDE approval before the program year begins. Independent Centers and Sponsoring Organization of Centers budget workbooks are due to the SDE by June 1 and the Sponsoring Organization of Day Care Homes budget workbooks are due by August 1. It is important the budget workbooks are complete and sufficient detailed information is provided for each budget item before submitting for approval to the SDE. Sponsors may contact the state agency with any questions to ensure the workbooks are complete. In addition, SDE contracts with an accounting firm to review all sponsoring organization budgets. Sponsoring organizations must submit their budget workbooks to the auditing firm prior to the SDE for review to ensure the budget is complete and expenses listed are allowable. The auditing firm may provide guidance to the sponsoring organization during this time to assist the organization with completing the budget.

Budget Process and Requirements



- June – August State agency reviews and approves budget workbooks
- June – September Institution enters approved budget summary in MyIdahoCNP application packet

Packet Assigned To: Kim Huntley

Action	Form Name	Latest Version	Status
View Revise	✔ Sponsor Application	Original	Approved
View Admin	✔ Civil Rights Information		Approved
Revise Details	✔ Board of Directors	Original	Approved
View Revise	✔ Sponsor Budget Detail	Rev. 1	Approved
View Revise	✔ Sponsor Management Plan	Rev. 1	Approved
Details	✔ Checklist (3)		
Details	Application Packet Notes		
View	Application Packet Notes for Sponsor		
Details	Attachment List		

	Approved	Pending	Return for Correction	Denied	Withdrawn/Closed	Error	Total Applications
Site Application(s)	1	0	0	0	0	0	1

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The next step in the process is when SDE reviews the Institutions budget workbook and determines if it is complete and ready for approval. If additional information is needed SDE will contact the Institution for revisions or additional information before approving the budget. Once the budget workbook is approved the Institution will receive an email notification. The approved budget workbook file name will have in it “SA approved”. This is very important since it will distinguish the file from the original budget workbook sent to SDE. The approved budget also has the signed SPWA form if applicable. Once the Institution receives the approved workbook , the next step is to enter the approved budget summary in the next fiscal year application packet in MyIdahoCNP in the Sponsor Budget Detail form as highlighted on this slide. It is important to attach the approved budget workbook in the budget detail as well.

Budget Process and Requirements



Quarterly Expenditure and Revenue Reports

The screenshot shows the MyIdahoCNP web application interface. At the top, there is a navigation bar with links for Applications, Claims, Compliance, Reports, Security, and Search. Below this, there are links for Programs, Year, Help, and Log Out. The main content area displays a table with two columns: Item and Description. The table lists various items related to the Child and Adult Care Food Program, including Sponsor Manager, Application Packet - Center, Application Packet - DCH, Download Forms, ACQR - Centers, ACQR - DCH, ACQR Summary - Centers, and ACQR Summary - DCH. The ACQR - Centers item is highlighted in red.

Item	Description
Sponsor Manager	CACFP Sponsor's Profile, Site and Hold Information
Application Packet - Center	Center Application Packet
Application Packet - DCH	DCH Application Packet
Download Forms	Forms for Downloading - CACFP
ACQR - Centers	Center Actual Cost Quarterly Report
ACQR - DCH	DCH Actual Cost Quarterly Report
ACQR Summary - Centers	Displays a summary of ACQR report activity for Centers.
ACQR Summary - DCH	Displays a summary of ACQR report activity for Homes.

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The budget process does not end once the budgets are approved. Based on Cost Principles in 796-2 revision 4, Institutions are responsible for accounting for costs correctly and for maintaining records and sufficient supporting documentation to demonstrate that costs claimed have been incurred, are allowable to the Program and comply with financial management requirements. Costs that are not properly documented and recorded are unallowable.

During the program year Institutions must maintain records of the actual expenses and revenue for operating the program. This data must be reported in the ACQR report in MyIdahoCNP for each federal fiscal quarter.

Budget Process and Requirements



Quarterly Expenditure and Revenue Reports

Quarter 1: Due January 15

Quarter 2: Due April 15

Quarter 3: Due July 15

Quarter 4: Due October 15

Budget Category	Budget Amount	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter	Total	Balance	Percentage
Administrative Expenses	10000	2500	2500	2500	2500	10000	0	100%
Instructional Expenses	10000	2500	2500	2500	2500	10000	0	100%
Other Expenses	10000	2500	2500	2500	2500	10000	0	100%
Revenue	10000	2500	2500	2500	2500	10000	0	100%

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Here is the expenditure and revenue report in MyIdahoCNP. At any time in the program year if you find you made a mistake in one of the quarter reports you may access the report for that quarter and update the form. If you update the form it is important to contact SDE so they may review and accept the changes in MyIdahoCNP. The federal fiscal year quarters and due date to submit the report are:

Quarter one is due January 15th and covers October, November and December

Quarter two is due April 15th and covers January, February, and March

Quarter three is due July 15th and covers April, May and June

And Quarter four (last quarter in year) is due October 15th and covers July, August and September.

Budget Process and Requirements



Common Findings on Quarterly Reports

- Reimbursement reported in incorrect quarter
- Expenses reported under incorrect category
- Expenses reported in incorrect quarter



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Some common findings the accounting firm and state agency is determining on the quarterly reports are:

Reimbursement reported in incorrect quarter- It is important reimbursement is reported based on the months earned. Example: 1st quarter reimbursement would be the amount of reimbursement claimed in October, November and December. Reimbursement is not based on the month received since each sponsor submits their claim at different times. The most consistent reporting method is based on when reimbursement is earned.

Expenses reported under incorrect category – Example is nonfood supplies like napkins or paper plates are reported under the food category. It is important the sponsor has a method to separate the expenses on receipts, invoices and in their accounting system so the correct expense is reported under the correct category.

Expenses reported in incorrect quarter- Expenses must be reported on an accrual basis (when cost is incurred). This is when the goods or services are received. Examples: When the food is purchased at the store, when product is delivered from vendor, or when a service such as equipment repair is completed. It is not based on when the product will be used or in some cases paid by the Institution. This is the most consistent method for the state agency to verify and monitor all Institution quarterly reports.

Budget Process and Requirements



Common Findings on Quarterly Reports

- Labor and Benefits – operating and administrative costs reported based on estimates or percentages
- Unallowable expenses included in reported totals
- Expenses reported as estimate not actual cost

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Common Findings continued:

Labor and Benefits– operating and administrative reported based on estimates or percentages. Institutions must maintain time and attendance reports for all labor costs (salaries, wages, benefits) charged to CACFP for hourly or salaried employees for part-time, full-time or piece-work. Reports must include the total time actually worked by the employee, not just the time spent on CACFP duties. The CACFP time must be recorded by time spent between administrative and operating duties. The portion of labor costs charged to the nonprofit food service account must be allocated based on hours worked in CACFP and non-program duties. 796-2 revision 4 pages 44-50. The Institution shall maintain a written compensation plan which includes these procedures.

Unallowable expenses included in reported totals- Example: cream cheese, granola bars, candy costs included under food expenses. Another example would be an expense that was not approved in the budget. An allowable expense will be unallowable if prior or specific written prior approval is not received from the state agency prior to purchasing the product or service. Approval only occurs through the approval process of the budget workbooks.

Expenses reported as estimate not actual cost- It is important all expenses are reported based on actual costs for operating the CACFP whether CACFP reimbursement or other funds are used to pay the expenses. Quarterly reports are used by the State agency to verify the Institution is operating a nonprofit foodservice and is financially viable to maintain the Program.

Budget Process and Requirements



Budget Amendments

Operating Expenses								
Budget Category	Approved Amended Budget	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Year to Date Expenditures	Budget Balance	Percentage Budget Expended
Salary and Wages	36,635	5,676	12,077	0	0	17,753	18,882	48.46
Benefits	4,029	624	1,328	0	0	1,952	2,077	48.45
Food Purchases	21,600	4,644	5,429	0	0	10,073	11,527	46.63
Meal Contracts (meal cost)	0	0	0	0	0	0	0	0.00
Mileage (meal transporting cost)	0	0	0	0	0	0	0	0.00
Non-Food Supplies	2,400	1,063	1,070	0	0	2,133	267	88.88
Food Service Durable Supplies/Equipment/Repair	0	0	0	0	0	0	0	0.00
Purchased Services	0	0	0	0	0	0	0	0.00
Food Service Space	0	0	0	0	0	0	0	0.00
Total Operating Expenses	64,664	12,007	19,904	0	0	31,911	32,753	49.35

Administrative Expenses								
Budget Category	Approved Amended Budget	First Quarter	Second Quarter	Third Quarter	Fourth Quarter	Year to Date Expenditures	Budget Balance	Percentage Budget Expended
Salary and Wages	5,915	811	1,938	0	0	2,749	3,166	46.48
Benefits	661	89	213	0	0	302	359	45.69

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Since budgeted expenses and revenue are estimates it is sometimes necessary to submit budget amendments. Budget amendments may be submitted to the state agency as needed by the Institution. The final budget amendment must be submitted to the state agency by September 1, in order for the state agency to review and approve the revisions prior to the Institution incurring the expense or revenue.

Institutions shall monitor their budget on a regular basis. When entering actual expenses and revenue in the quarterly reports is a good time to review your Institution's budget status. In the far right column in the quarterly report is the % of the budget that has been expended. If your Institution is in the second quarter (half way through your program operation) and the expenditure in Food and Milk is already at 95%, you will need to complete a budget amendment.

Institutions may **not** go over more than 10% per any line item expense. Any amount over 10% on any line item will be unallowable and must be paid with other program funds. It is important to submit an amended budget and receive approval before incurring the expense. To submit a budget amendment to SDE, use the Institutions "SA approved" budget workbook and make any necessary changes in the workbook. If you cannot find the "SA approved" workbook in your files you may access the most current approved budget in MyIdahoCNP Sponsor Budget Detail in the Institutions application packet. Once the workbook is updated, submit the amended budget to SDE for approval. Once SDE approves the amended budget, SDE will update MyIdahoCNP Sponsor Budget Detail, attach the current approved amended budget workbook in the budget detail form and send an email notification the budget amendment is approved. At this point, when the Institution accesses the Quarterly reports the percentage expended is updated.

Budget Process and Requirements



Allowable versus Unallowable Costs

Allowable Costs- Necessary and Reasonable

- Legal under State and local laws
- Conform with Federal regulations
- Cost is treated consistently
- Adequate documentation
- Allocable (shared expense)
- Prior or Specific Prior Approval

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Let's now talk a little more about allowable and unallowable costs. Costs must be Necessary, Reasonable and required to operate in CACFP. The cost should reflect what a sensible or practical person would pay. Example: If purchasing a car for monitors an Organization would not purchase a Lexus when an economical vehicle would be more reasonable.

Legal under State and Local Law

In order to be allowable, the cost must be authorized or at least not prohibited under Federal, State or local laws and regulations. Some State or local laws are more restrictive than Federal laws and regulations and may therefore prohibit certain costs.

EXAMPLE: Some States or local governments/organizations have lower small purchase thresholds than the current Federal small purchase threshold. An institution wishing to vend meals or procure other services must make sure it follows the State/local small purchase threshold if the State/local small purchase threshold is lower than Federal threshold.

Conform with Federal Regulations

The cost must conform to limits or exclusions, as set forth in FNS Instruction 796-2, Rev. 4 and Federal laws, or other governing regulations. If a cost is prohibited by the IRS, it cannot be allowed in CACFP.

EXAMPLE: Personal expenses are not deductible as business expenses under both the IRS rules and CACFP regulations. On the other hand, car expenses associated with conducting CACFP reviews are allowable business expenses under all Federal laws, and reimbursement is based on the actual mileage driven to conduct the reviews.

Consistent Treatment

The cost must be treated consistently through the application of U.S. GAAP principles. This means the same cost cannot be charged differently depending on the Program to which it is assigned [FNS Instruction 796-2, Rev. 4 (Section VII A 2)].

EXAMPLE: If an organization pays \$0.55 per mile for business travel for the staff that conducts non-CACFP travel, it cannot claim \$0.60 per mile for CACFP business travel. All expenses and revenue must be documented and the Institution must maintain the documentation. If expenses in the budget is allocable it must be allocated accurately and if prior or specific prior written approval is necessary it is approved by SDE before the Institution assumes the cost. Costs must be approved by SDE in the Institutions budget before the Institution may begin spending CACFP funds on the costs.

Budget Process and Requirements



Allowable versus Unallowable Costs

Unallowable Costs-

- Costs that are not a reasonable expense specifically for the CACFP;
- Costs that are not necessary for the operation/administration of the CACFP;
- Costs that are not approved in the CACFP budget or a budget amendment;
- Costs that are not properly allocated between CACFP and other non-CACFP Programs;
- Less-than-arms-length transactions that are not properly disclosed and approved.

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Unallowable Costs are:

Costs that are not a reasonable expense specifically for the CACFP;
Costs that are not necessary for the operation/administration of the CACFP;
Costs that are not approved in the CACFP budget or a budget amendment;
Costs that are not properly allocated between CACFP and other non-CACFP Programs;
Less-than-arms-length transactions that are not properly disclosed and approved.

Budget Process and Requirements



Operating Versus Administrative Costs

Examples of Operating Costs:

- Food
- Food service labor and benefits-activities to plan, prepare and serve the meals or snacks
- Nonfood supplies
- Food service equipment

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What is the difference between operating and administrative costs? Operating costs are any expenses to plan, prepare and serve the meals and snacks in the program. Here are some examples of operating costs:

- Food
- Food service labor and benefits-activities to plan, prepare and serve the meals or snacks-this includes prepare and completing menu records and purchasing the food and supplies
- Nonfood supplies
- Food service equipment

Budget Process and Requirements



Operating Versus Administrative Costs

Examples of Administrative Costs:

- Administrative labor and benefits-activities to plan, organize and manage program
- Office and training supplies
- Office equipment
- Monitoring travel expenses

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Administrative costs are any expenses to plan, organize and manage the program. This includes completing the CACFP application, recruiting and hiring, preparing and monitoring the budget, monitoring facilities, providing training to organizations and facilities etc.

Examples of Administrative Costs:

Administrative labor and benefits-activities to plan, organize and manage program
Office and training supplies
Office equipment
Monitoring travel expenses

Budget Process and Requirements



Record Keeping Requirements

All records to support the budget expenses and revenue must be maintained for three years plus the current program year in CACFP. This includes but is not limited to:

- Food and Supply receipts,
- Invoices, purchase orders, itemized cash receipts, delivery tickets
- Cost records for transportation (mileage records)
- Expenses related to vended meals
- Lease or rental invoices
- Training and Travel receipts
- Time sheets, time and attendance reports, payroll records

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All records to support the budget expenses and revenue must be maintained for three years plus the current program year in CACFP.

This includes but is not limited to:

- Food and Supply receipts,
- Invoices, purchase orders, itemized cash receipts, delivery tickets
- Cost records for transportation (mileage records)
- Expenses related to vended meals
- Lease or rental invoices
- Training and Travel receipts
- Time sheets, time and attendance reports, payroll records

Any questions before we move on to Procurement and Contracts?

Procurement and Contract Requirements



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Now let's review the procurement and contract requirements in CACFP.

Procurement and Contract Requirements



Procurement in CACFP

- Written procurement standards and procedures
- Methods of procurement
- Record maintenance requirements
- Geographic preference



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We will start with procurement requirements and will take a look at procurement standards and guidelines when procuring food, supplies, equipment and other goods and services. Each Institution shall maintain written procurement standards and procedures. We will review the procurement methods, procurement record maintenance requirements and conclude with geographic preference.

Procurement and Contract Requirements



Procurement Standards (7 CFR 226.22)

- Standards of conduct-
Conflict of interest
- Procurement procedures
- Free and open competition
- Debarred or suspended

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Procurement standards are necessary to ensure materials and services are obtained efficiently and economically and are in compliance with State and local laws. Institutions shall maintain a written code of standards of conduct, establish procurement procedures and all procurement transactions shall be conducted in a manner that provides the maximum of free and open competition. An institution should not knowingly do business with a company that is debarred or suspended.

Debarred: A company is prohibited from doing business in Child Nutrition Programs.

Suspended: A company is temporarily prohibited from doing business in CNP.

Procurement and Contract Requirements



Procurement Standards of Conduct



Written code of conduct— governs performance of officers and employees that administer contracts supported by CACFP funds

Conflict of Interest— real or apparent when selecting and awarding a contract or using small procurement methods in CACFP



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An Institutions written standards of conduct shall govern the performance of their officers (Board of Directors) and employees engaged in the award and administration of contracts supported by CACFP payments. No employee or board member shall participate in the selection, or in the award or administration of a contract, or when using small purchasing procedures, when supported by Federal funds if a conflict of interest, real or apparent, would be involved. A conflict would arise when an employee, board member, any member of their immediate family; or a partner; has a financial or other interest in the firm or vendor selected for award. Transactions with such firm or vendor is considered a less than arms length transaction.

The Institution's board members and employees shall neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub-agreements. Institutions may set minimum rules where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value. For example: no employees may accept gifts with a value of more than \$25.

Procurement and Contract Requirements



Sample Written Code of Conduct

Available in MyIdahoCNP Download forms

Child Nutrition Programs
Idaho State Department of Education
PO Box 83720
Boise, ID 83720-0327

CNP # 2015-1

Sample Code of Conduct for Child Nutrition Programs

Pursuant to 2 CFR 200.318 (c) (1), a code of conduct will be expected of all persons who are engaged in the awarding and administration of contracts supported by USDA Food and Nutrition Program Funds. The written standards of conduct must comply with the federal rule. At a minimum, the standards should include:

1. No employee, officer or agent of the **(Sponsor Name)** shall participate in the selection or in the award or administration of a contract supported by program funds if a conflict of interest, real or apparent, would be involved.

Conflicts of interest arise when one of the following has a financial or other interest in the firm selected for the award or in any tangible personal benefit offered by the firm:

- a. The employee, officer, or agent;
- b. His or her partner;
- c. Any member of his or her immediate family;
- d. An organization which employs or is about to employ one of the above.

2. The **(Sponsor Name)** employees, officers, or agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, political contractors, or parties to sub-agreements. Trivial benefits not to exceed a value of fifty dollars (\$50.00) incidental to personal, professional or business contracts and involving no substantial risk of undermining official impartiality may be permitted.

3. Penalties for violations of the standards of code of conduct of the **(Sponsor Name)**'s Child Nutrition Program may include any or all of the following:
 - a. Reprimand or other disciplinary action by Board or Business Owner
 - b. Dismissal by Board or Business Owner
 - c. Additional legal action necessary

The non-Federal entity must maintain a written code of standards of conduct, establish procurement procedures and all procurement transactions shall be conducted in a manner that provides the maximum of free and open competition. These procedures must reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the standards identified in 2 CFR 200.318. An institution should not knowingly do business with a company that is debarred or suspended.

Consult with local legal advisors on the statutes applicable to each institution so the policy may be tailored to your facility.

This is the SDE sample written code of conduct. It is available to all sponsors in MyIdahoCNP under download forms.

Procurement and Contract Requirements



Procurement Procedures

- Establish written procedures that avoid unnecessary or duplicate purchases
- Include all types of products purchased and methods of procurement
- Take steps to allow small and minority businesses

Examples: Include in solicitation lists, divide tasks or quantities, revise delivery schedules

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The Institution shall establish written procurement procedures which allow the proposed procurement actions to be reviewed by Institution officials to avoid the purchase of unnecessary or duplicative items. It is important to consider all products by type the Institution purchases and the methods of procurement.

Affirmative steps shall be taken to assure that small and minority businesses are utilized when possible.

For Example:

Including qualified small and minority businesses on solicitation lists;

When economically feasible, dividing total requirements into smaller tasks or quantities to permit maximum small and minority business participation. This may be as easy as awarding the contract by product type-produce, dairy, freezer products, dry food supplies, paper supplies, cleaning chemicals, etc.;

Where the requirement permits, establishing delivery schedules which will encourage participation by small and minority businesses.

Procurement and Contract Requirements



Procurement Procedures continued

- Include written standards of conduct to avoid conflict of interest and maximize free and open competition
- Document where procurement records will be maintained
- Include who in Institution is responsible for following the procedures



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The written procedures shall also include the written standards of conduct for the Institution and processes to avoid conflict of interest and to maximize free and open competition. The Institution should include where the procurement records will be maintained within the Institution. For large organizations this may be a specific department within the organization. Finally the procedures shall be clear as to who in the Institution is responsible for following the procedures. This should include the governing board, administration and any other employees responsible for procuring products or services for the Institution.

Procurement and Contract Requirements



Free and Open Competition

Procurement procedures shall not restrict or eliminate competition.

Examples of restrictive competition:

- Placing unreasonable requirements on vendors
- Non-competitive practices
- Organizational conflict of interest
- Unnecessary experience or bonding requirements

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All procurement transactions, regardless of whether by sealed bids or by negotiation and without regard to dollar value, shall be conducted in a manner that provides maximum open and free competition consistently. Procurement procedures shall not restrict or eliminate competition. Examples of restrictive competition include, but are not limited to: Placing unreasonable requirements on firms or vendors in order for them to qualify to do business, Non-competitive practices between firms, Organizational conflicts of interest, and Unnecessary experience and bonding requirements.

Procurement and Contract Requirements



Procurement Methods (2 CFR Part 200.320):

- Micro-purchasing (up to \$3,500) *updates coming*
- Small purchasing (up to \$150,000) *updates coming*
- Competitive sealed bids
- Competitive negotiation
- Noncompetitive negotiation

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Now that you know some of the practices of procurement lets review procurement methods. The procurement method an Institution will use depends on the total dollar amount of goods or services purchased based on the normal and reasonable frequency of purchases. **Micro-purchasing** occurs when the total dollar amount of purchases by frequency is under \$3,500 (Federal Threshold). Micro-purchases may be awarded without soliciting competitive quotation if price is reasonable. **Small purchase procedures** occur when the total dollar amount of purchases by frequency are under the Federal purchasing threshold of \$150,000.

For all purchases over \$150,000 (Federal threshold), the Institution must use one of the following large procurement practices:

Competitive sealed bids, also known as an Invitation for Bid (IFB) Competitive negotiation which is a Request for Proposal (RFP)

Or Noncompetitive negotiation, IFB or RFP.

Please note: The office of management and budget (OMB) released a memo-M-18-18 on June 20, 2018 raising the micro threshold to \$10,000 and the small procurement threshold to \$250,000. In addition, there will be an approval processes to request a micro-purchase threshold higher than \$10,000. Institutions must submit their request to the Institution's cognizant Federal agency for indirect cost rates. It is recommended to forward the request to the CNP state agency as well. USDA will release a policy memo on these changes soon.

Procurement and Contract Requirements



	Informal		Formal Methods		
	Micro Purchases	Procurement by Small Purchase Procedures	Sealed Bids (IFB) (formal)	Competitive Proposals (RFP) (formal)	Non-competitive Proposals
Regulations	200.320(a) 200.67	200.320(b) 200.88	200.320(c)(1)(i-iii) 200.320(c)(2)(i-v)	200.320(d)(1)	200.320(f)(1)
Procedures in a nutshell		Minimum of three price quotes	Technical specifications Advertise bid Public bid opening Award on price alone – firm fixed price	Solicitation includes evaluation criteria. Award based on score with significant weight on price and not price alone	>Item available only from a single source >public exigency >competition deemed inadequate
SA oversight	Assurance of reasonable and necessary costs	Assurance of competition, buy American	Assurance of advertising, bid opening and resulting in fixed price contract (required provisions relative 7 CCFR 210 and 7 CFR 200 Appendix 2 part 200	Assurance of advertising, SA approval prior to execution of contract, may result in fixed price or cost reimbursable (required provisions relative to procurement 7 CFR 210 and 7 CFR 200, Appendix 2 part 200) > SA must assure SFA receives discounts, rebates and credits in cost reimbursable contracts	Assure adherence to 200.320(f)(1)

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Here is a chart of the procurement methods, where each is located in the regulations, general procedures for each and assurances. Let's review the procedures for each: Micro purchasing- no competitive quotes required but pricing must be reasonable and necessary. Each Institution is responsible for comparing prices in area (no written documentation required) to meet this assurance. The state agency will review receipts during program reviews to verify the Institution is purchasing from more than one source.

Small Purchasing Procedures: Minimum of three written price quotes from vendors.

IFB, RFP – Formal bidding processes must be followed for each: technical (detailed) specifications, advertising, public opening. For an IFB the bid is awarded based on price alone (firm fixed price). For an RFP the solicitation will include the evaluation criteria, award is based on score with significant weight on price but not price alone. RFP's are used when a service is necessary with the purchase of a product. Example: Delivery of food to site locations per a specific delivery schedule.

Non-competitive Proposals- This is when product is only available from a single source and competition is deemed inadequate.

Procurement and Contract Requirements



Procurement Record Maintenance

Institutions must maintain written procurement records for three years plus the current program year. The records must include, but are not limited to:

- Detail of procurement history
- Rationale for procurement method
- Selection of contract type
- Contractor selection or rejection
- And basis for the cost or price

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Institutions shall maintain written procurement records for three years plus the current program year. The written records shall sufficiently detail the significant history of procurement. These records shall include, but are not necessarily limited to information pertinent to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the cost or price. The cost and price is documented with purchase orders, delivery receipts, invoices, or itemized cash receipts.

Procurement and Contract Requirements



Geographic Preference



Institutions may– apply geographic preference for unprocessed locally grown or locally raised agricultural products and may define local.

Several Food handling and preservation techniques are allowed



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Institutions participating in CACFP may apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products. When utilizing the geographic preference to procure products, the Institution making the purchase has the discretion to determine the local area to which the geographic preference option will apply;

For the purpose of applying the optional geographic preference, “unprocessed locally grown or locally raised agricultural products” means only those agricultural products that retain their inherent character. The effects of the following food handling and preservation techniques shall **not** be considered as changing an agricultural product into a product of a different kind or character: Cooling; refrigerating; freezing; size adjustment made by peeling, slicing, dicing, cutting, chopping, shucking, and grinding; forming ground products into patties without any additives or fillers; drying/dehydration; washing; packaging (such as placing eggs in cartons), vacuum packing and bagging (such as placing vegetables in bags or combining two or more types of vegetables or fruits in a single package); addition of ascorbic acid or other preservatives to prevent oxidation of produce; butchering livestock and poultry; cleaning fish; and the pasteurization of milk.

In an IFB or RFP an Institution may provide extra points for local foods when making their selection or allow higher costs for local products. This may apply to small procurement selection too.

Procurement and Contract Requirements



Written Contract Requirements

Institutions must maintain written contracts for three years plus the current program year. The contracts shall include the standard contract provisions provided in 7 CFR 226.22, 226.21 (FSMC) and 226.6(i).

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We will now review the contract requirements and sample of food service contracts available to Institutions from SDE.

Institutions must maintain written procurement contracts for three years plus the current program year. The contracts shall include the standard contract provisions provided in 7 CFR 226.22, 226.21 (FSMC) and 226.6(i) depending on the type of contract. 7 CFR 226.21 is specific for a Food Service Management Contract.

Procurement and Contract Requirements



Food Service Contracts

There are two types of Food Service Contracts and prototypes available in MyIdahoCNP download forms

- Food Service Management Company (FSMC) Contract
- Food Service Vendor Agreement

Contracts must be provided to SDE annually and Institutions are responsible for ensuring the FSMC or vendor meets all Federal, State and local requirements

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Institutions may contract with a FSMC or vendor to supply the meals and snacks to their sites. There are two types of Food Service Contracts and prototypes available in MyIdahoCNP download forms. The Food Service Management Company (FSMC) Prototype Contract and the Food Service Vendor Agreement. If an Institution chooses to develop their own contract or agreement the document must include all the standard contract provisions and be approved by the state agency before implementing.

Institutions must follow the appropriate procurement methods when procuring the contracted products and services, the contracts must be submitted to the state agency annually for approval and the Institution is responsible for ensuring the FSMC or vendor conforms to the contract or agreement and meets all Federal, State and local requirements. This includes meeting the CACFP meal pattern requirements. Any questions?

Morning Break



*10 Minute
Morning Break*



It's Time For A Break

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Let's take a 10 minute morning break.

Monitoring Requirements



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We will now review the monitoring requirements for sponsoring organizations that sponsor centers or day care homes. If you are an Independent Center participating on the program you are not required to meet the monitoring requirements but this information is good to be aware of if you choose to expand and sponsor multiple centers.

Monitoring Requirements



Requirements for Sponsoring Organizations:

- New facilities-(center or home) must have a pre-approval visit
- New facilities must be reviewed within four weeks of operation
- Minimum of 3 site monitoring visits per year
- 2 of 3 visits are unannounced visits

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Here are the monitoring requirements for Sponsoring Organizations:

- New facilities (centers and day care homes) must have a pre-approval visit before the facility begins participating and claiming meals in CACFP. There is a preapproval form available in MyIdahoCNP download forms you may use for this requirement.
- New facilities must be reviewed within four weeks of operation. This is a great time to provide additional technical assistance and confirm the facility is off to a good start, maintaining records and in compliance with the regulations. During this visit use the standard monitoring form. A sample monitoring form is available in MyIdahoCNP download forms. An organization may use their own monitoring form or preapproval visit form but it must be approved by the state agency before implementing.
- There must be a minimum of 3 site monitoring visits per year. It is important to track monitoring visits in a tracking log to ensure all visits are completed.
- 2 of the 3 monitoring visits must be unannounced visits

Monitoring Requirements



Requirements for Sponsoring Organizations Continued:

- At least 1 unannounced visit must include a meal service observation
- No more than 6 months between monitoring visits
- Vary the timing of unannounced visits so they are unpredictable

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At least 1 unannounced visit must include a meal service observation. Best practice is to observe a meal service at each monitoring visit. There may be no more than 6 months between monitoring visits. Again using a tracking log ensures you are meeting this requirement for each facility.

It is important to vary the timing of unannounced visits so they are unpredictable. Examples of varying the timing are: conducting visits in different months from year to year, at different times in the month, observe a variety of meal services including supper and if the facility is open on weekends or holidays conduct some visits in the year during these times.

Monitoring Requirements



Monitoring Tools

Sponsoring organizations must maintain complete monitoring forms and tracking logs to support each facilities monitoring visits.

A few important components of the monitoring form:

- Records and evaluation checklist
- 5-day meal count reconciliation
- Meal observation
- Summary of any findings and corrective action
- Technical Assistance provided
- Certification and signatures

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Sponsoring organizations must maintain complete monitoring forms and tracking logs to support each facilities monitoring visits.

The monitor must thoroughly document what was observed on site visits and in required records. All questions and sections on the monitoring form must be completed. In this process, the monitor would be able to identify any problems and patterns of non-compliance if occurring.

Both the center and day care home forms are located in MyIdahoCNP under download forms. If the sponsoring Organization chooses, they may develop their own monitoring forms and submit it to SDE for approval prior to implementing the form.

A few important components on the form are:

Records and evaluation checklist; 5-day meal count reconciliation; Meal observation; Summary of any findings and corrective action; Technical Assistance provided; and Certification and signatures

Monitoring Requirements



Monitoring Tracking Logs

Sponsors must maintain a tracking log for all monitoring reviews to include:

- Site name and meal observed
- Date of each site monitoring visit
- Description of findings
- Corrective Action (CA)
- Date CA due
- Date CA received
- Date of follow-up visit
- Date findings are corrected

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In addition to completing the monitoring form the sponsoring Organization must also maintain a monitoring tracking log that reports:

Site name and meal observed

Date of each site monitoring visit

Description of findings

Corrective Action (CA)

Dates CA due and received

Training or technical assistance provided

Date of follow-up visit

Date findings are corrected

If the monitor notes issues that need follow-up, a date for follow-up must be recorded on the original monitoring form and the tracking log, and the follow-up visit must be conducted and documented with resolutions noted.

Monitoring Requirements



Five Day Reconciliation

Compare facility enrollment, attendance and meal counts for most recent five consecutive days – include all meals served in all classrooms at centers

B -- 5 Day Meal Count Reconciliation

	Enrollment	Attendance	Breakfast	AM Snack	Lunch	PM Snack	Supper	Late Snack
Day 1								
Day 2								
Day 3								
Day 4								
Day 5								

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During the monitoring visit complete a five day reconciliation.

Compare the facility enrollment, attendance and meal counts for most recent five consecutive days –include all meals served in all classrooms at centers. This is a requirement in the regulations for each monitoring visit. The process is the same for centers and homes it is aggregate data not by child name. If a center is not required to maintain enrollment records (emergency shelters and at-risk afterschool centers) this column would be left blank. Review the facility records onsite. If on any day the facility recorded more meals than children enrolled or in attendance the difference must be disallowed and may not be claimed for reimbursement. This is considered a finding and the facility shall be provided with a corrective action from the organization.

The facility may only claim meals for children recorded in attendance with a time in and out and recorded receiving a meal on the meal count records. This includes snacks. Child care centers, Head Start and Family day care homes may only claim meals for children enrolled in the facility.

Monitoring Requirements



Facility Record Maintenance

All facilities must maintain claim records for three years after the date of submission of the final claim for the FFY CFR 226.10(d).

Either *Electronic* or *Paper*



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All facilities (centers or daycare homes) must maintain claim records for three years after the date of submission of the final claim for the FFY CFR 226.10(d).

Either Electronic or Paper. If the electronic is a scanned copy of the paper records the record must be legible.

It is important the monitors are verifying during the visit that the facility is maintaining the required records. If the facility records attendance or meal counts on a paper document and then later enters the information into the sponsor's electronic claiming system the paper source document must be reviewed during monitoring visits when conducting the 5 day study to ensure the facility is entering the data accurately into the system. If the facility is not maintaining the records or information is entered incorrectly from the source document to the sponsor's electronic claiming system this is a finding and required corrective action must be issued by the sponsor for the facility.

Monitoring Requirements



Facility Record Maintenance continued

Onsite

Per Policy memo CACFP 03-2009

Records must be maintained onsite for current month and previous 12 months.



Offsite option

Remaining 2 years may be stored offsite but must be accessible in reasonable amount of time.



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For facility (centers and homes) records must be maintained ***Onsite*** for the current month and previous 12 months per Policy memo CACFP 03-2009.

The remaining 2 years may be stored ***Offsite*** but must be accessible in reasonable amount of time by the sponsoring organization, state agency or USDA during a monitoring visit or upon request for a desk review.

Monitoring Requirements



Facility Record Maintenance continued

Claim Records Include:

- Enrollment forms
- Income eligibility forms
- Meal count records
- Attendance records
- Menu records



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Required claim records for facilities (centers and day care homes) include:

- Enrollment forms (if required for the facility)
- Income eligibility forms (centers & homes if required)
- Meal count records
- Attendance records
- Menu records- I will review the menu records later in this training

Monitoring Requirements



Monitor Training Requirements

Organizations must train monitors annually on their written monitoring procedures

Training shall include program requirement and how to “connect the dots” during a monitoring visit:

- Why they are looking at particular records;
- What they are looking for in those records;
- How to ask questions about what they observe;
- How to determine if it is a finding or only technical assistance
- How to write up findings and corrective action from records or procedures; and
- How to follow up with facilities to ensure that findings are resolved

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Sponsoring Organizations must thoroughly train the Organization’s monitors in CACFP and Civil Rights requirements and provide each monitor with the sponsoring Organization’s written monitoring procedures.

More than that, organizations shall also use this training to ensure that monitors who are in facilities know:

Why they are looking at particular records;

What they are looking for in those records;

How to ask questions about what they observe;

How to determine if it is a finding or only technical assistance

How to write up findings from records or procedures; and

How to follow up with facilities to ensure that findings are resolved. It is important all follow up reviews are documented on the monitoring form and in the tracking log.

Monitoring Requirements



Monitoring Finding versus Technical Assistance



Finding— Identification of noncompliance with CACFP regulations, FNS Instructions, policy memos or state policies. Each finding is associated with a required corrective action.

Technical Assistance (TA)--

Guidance and support to facilities either verbally or in writing from the monitor to achieve regulatory compliance and Program improvement.



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What is the difference between a finding and technical assistance?

Finding— Identification of noncompliance with CACFP regulations, FNS Instructions, policy memos or state policies. Each finding is associated with a required corrective action. Findings may also include meal or snack disallowances.

Technical Assistance (TA)--Guidance and support to facilities either verbally or in writing from the monitor to achieve regulatory compliance and Program improvement. TA may be provided during a monitoring visit in addition to a finding. TA may also be provided outside of monitoring visits when answering facility questions.

Both findings with corrective action and technical assistance must be clearly documented on the monitoring forms and tracking logs.

Monitoring Requirements



Monitor Corrective Action (CA)

Corrective Action—A series of steps taken to correct a weakness or error in the operation or management of CACFP in order to conform to the rules and regulations for the proper administration and operation of CACFP.

Examples of Corrective Action:

- *Require training and documentation of training*
- *Develop or update procedures*
- *Provide missing documents to Sponsoring Organization (enrollment, eligibility, CN labels, recipes, menus, etc.)*

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What is monitoring corrective action?

Corrective Action is a series of steps taken to correct a weakness or error in the operation or management of CACFP in order to conform to the rules and regulations for the proper administration and operation of CACFP

Examples of Corrective Action:

- Require training and documentation of training
- Develop or update procedures
- Provide missing documents to Sponsoring Organization (enrollment, eligibility, CN labels, recipes, menus, etc.)

Some corrective actions may occur during the monitoring visit but others may require more time for the facility to correct. It is important all corrective action is completed in a timely manner and by the due date provided by the monitor. Due dates should be no more than 30 days past the date of finding. Best practice is to set the date within a week or two from the visit. A follow up visit should occur within 30 days of receiving the corrective action.

Monitoring Requirements



Corrective Action and Follow up Visits

- All findings on a monitoring visit must have a corrective action and due date
- Corrective action must be completed and received by the Organization by the due date
- Monitors must conduct a follow up visit in a reasonable time to ensure the finding was corrected
- Monitors must document on monitor forms if previous findings were corrected and corrective action plans were implemented

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It is important that Sponsoring Organizations train their monitors on findings and provide them with reasonable corrective action examples. This ensures consistency with all monitoring visits.

Below are requirements for findings, corrective action and follow up visits for all monitors:

- All findings on a monitoring visit must have a corrective action and due date
- Corrective action must be completed and received by the Organization by the due date. Some corrective actions may occur during the monitoring visit but others may require more time for the facility to correct. Due dates should be no more than 30 days past the date of finding. Best practice is to set the date within a week or two from the visit.
- Monitors must conduct a follow up visit in a reasonable time to ensure the finding was corrected (reasonable within 30 days)
- Monitors must document on monitor forms and tracking logs if previous findings were corrected and corrective action plans were implemented

When corrective action is not implemented and findings were not completed resulting on a second finding the center or provider shall be deemed serious deficient.

Monitoring Requirements



Household Contacts

Sponsoring Organizations are required to contact households in writing or by telephone within 60 days of finding irregularities

These findings may come from:

- Observations or records reviewed during a monitoring visit
- Sponsor or SDE receives a “Whistleblower” complaint
- Sponsor questions the validity of a facility claim
- Any other time deemed necessary by the sponsor

SDE Household Contact Procedures are located in the CACFP Manual

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Sponsoring Organizations of day care homes or unaffiliated centers are required to contact households in writing or by telephone within 60 days of finding irregularities. The Sponsoring Organization must conduct household contacts to verify the accuracy of a claim (or claims) and supporting records whenever one or more of following instances take place: If during a site monitoring visit the monitor observes:

- Substantially fewer children are present on the review day than are regularly claimed without good reason (flu epidemic, field trip, etc.).
- Participant attendance records or enrollment forms appear unauthentic.
- Records were completed in advance.
- A meal is always claimed by the facility; however the facility is not serving that meal when the monitor conducts the visit, including holiday and weekend visits. For example, a facility always serves supper at 5:30 PM, but when the monitor visits at 5:30 PM, the facility is not serving a meal or planning to serve a meal.
- Daycare Homes only, the provider is not at the home when a monitor attempts to visit, but the provider claims the meal for reimbursement.
- Discrepancies in record keeping and other various reasons that cause a sponsor to question the claim.

In addition, household contacts shall occur if the sponsor or SDE receives a whistleblower complaint regarding meal claiming. The sponsor questions the validity of a facility’s reimbursement claim or any other time deemed necessary by the sponsor. SDE household contact procedures are located in the Idaho CACFP manual.

Monitoring Requirements



Imminent Threat to Health or Safety

During a monitoring review of a day care home or unaffiliated center, the Organization discovers facility conduct or conditions that pose imminent threat to the health and safety of the participants or public the sponsor must:

- Notify the State or local licensing or health authorities
- Take action consistent to their recommendations
- Immediately suspend the facilities participation in CACFP
- Send Notice of suspension, serious deficiency and proposed termination
- Follow remaining suspension procedures in the CACFP Manual

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Sponsoring Organizations of day care homes and unaffiliated centers that discover in a monitoring review, facility conduct or conditions that pose an imminent threat to the health or safety of participating children or the public, the sponsoring Organization must immediately notify the appropriate State or local licensing or health authorities and take action that is consistent with the recommendations and requirements of those authorities. Sponsoring Organizations of affiliated centers should have internal procedures to ensure their facilities are safe for the children enrolled.

In addition, the sponsoring Organization must immediately suspend the facility's participation in CACFP, send Notice of suspension, serious deficiency and proposed termination and follow the remaining suspension procedures provided in the Sponsoring Organization of Day Care Homes and Sponsoring Organization of Centers sections of the CACFP manual located on the CNP website. The serious deficiency procedures and USDA templates are located in the FNS Serious Deficiency Handbook on the CNP website as well.

Serious Deficiency Process



Serious Deficiency, Suspension, & Appeals for
State Agencies & Sponsoring Organizations
A Child and Adult Care Food Program Handbook



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The serious deficiency process in CACFP was established to ensure compliance with the program regulations and guidance. The serious deficiency process offers a systematic way for State agencies or sponsoring organizations of day care homes or unaffiliated centers to take actions allowing institutions to correct serious Program problems and ensures due process.

USDA Serious Deficiency Handbook is the best resource for the Serious Deficiency Process. The State agency and sponsoring organization use the template letters included in this handbook when issuing notices in the serious deficiency process.

Supplemental information is also available in Idaho CACFP Manual located on the Idaho CNP website under the Child and Adult Care Food Program.

Serious Deficiency Process



Six Steps of the Serious Deficiency Process

1. Identify the serious deficiencies;
2. Issue a notice of serious deficiency;
3. Receive and assess the written corrective action plan (CAP) for adequacy;
4. Issue a notice of temporary deferral of the serious deficiency if the CAP is approved, or issue a notice of proposed termination and disqualification, including appeal procedures, if the CAP is not adequate (or if no CAP plan is received);
5. Provide an appeal review (appeal hearing, administrative review), if requested, of the proposed termination and disqualification; and
6. Issue a notice of final termination and disqualification if the appeal is upheld or if the timeframe for requesting an appeal has passed, or issue a notice of temporary deferral if the appeal is overturned.

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It is important sponsoring organizations that sponsor day care homes and unaffiliated centers train their monitors on the serious deficiency process and when findings rise to the level of a serious deficiency determination. The serious deficiency process has six steps that start when the State agency or organization identifies a serious deficiency. The resolution will be either the correction of the problem and the issuance of a temporary deferment of the serious deficiency, or the institution's or facilities termination and disqualification from the Program.

The six steps in the serious deficiency process are:

1. Identify the serious deficiencies;
2. Issue a notice of serious deficiency;
3. Receive and assess the institution's written corrective action plan (CAP) for adequacy;
4. Issue a notice of temporary deferral of the serious deficiency if the CAP is approved, or issue a notice of proposed termination and disqualification, including appeal procedures, if the CAP is not adequate (or if no CAP plan is received);
5. Provide an appeal review (appeal hearing, administrative review), if requested, of the proposed termination and disqualification; and
6. Issue a notice of final termination and disqualification if the appeal is upheld or if the timeframe for requesting an appeal has passed, or issue a notice of temporary deferral if the appeal is overturned.

Administrative Review Procedures (Appeals)



Procedure included in
Training packet

Also available on Idaho CNP Website

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The CACFP Administrative Review Procedures, also known as the Appeal Procedures are provided in your training packet and located on the CACFP website for easy access for all sponsors. The SDE will provide the Administrative Review Procedures to sponsors with notice of action letters. Such notices are fiscal action (recovering of funds), denial of participation or proposed termination notices.

It is important to note, if you receive a notice of action and decide to appeal the action to provide the notice of action letter to the appeal officer within the required time line. As a sponsor you have the option of a written review or an in-person hearing and must also specify which option you are requesting.

At any time you may contact the state agency with questions on the appeals process.

Civil Rights and Meal Accommodations



FY18 Online Civil Rights Training in CNP Training Portal

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At this time, each participant of this training should have already completed the online civil rights training in the CNP training portal on the Idaho CNP website. This is where the state agency tracks all of their required training for key staff in Institutions. If you have not completed the training yet, please do so ASAP so you may receive your certificate for completing the CACFP annual mandatory training for 2018.

Civil Rights and Meal Accommodations



Civil Rights Training for Frontline Staff

All the instruction staff, local agencies are responsible for training their students, faculty, "frontline staff," "frontline staff" who interact with program participants or volunteers, and those persons who receive "services and" "meal and program services" from an approved meal program.

PURPOSE OF CIVIL RIGHTS TRAINING Civil rights training upholds compliance, enforcement, and prohibition of discrimination in USDA-funded child nutrition programs, like the School Breakfast Program operating in the classroom. Training of frontline staff and volunteers in Civil Rights ensures that program recipients are given equal access and treated without discrimination while participating in the USDA Meal programs. Civil rights training must occur before staff and volunteers assume their duties in USDA Meal program, and annually thereafter.

Civil rights are in place to protect children and families from being discriminated against while participating in USDA meal programs.

DISCRIMINATION

Discrimination occurs when participants are:

- DEINED benefits or services that others receive.
- DELAYED in receiving benefits or services that others receive.
- Treated DIFFERENTLY than others, resulting in a disadvantage.

Examples of discrimination:

- Refusing a person's enrollment in a program based on disability.
- Failure to provide reasonable accommodation to disabled individuals.
- Serving meals at a time, place, or in a manner that is discriminatory.
- Failing to provide materials that give non-English speaking persons full and equal opportunity to receive benefits.



PROTECTED CLASSES

A protected class is a group of people with a common characteristic, who are legally protected from discrimination on the basis of that characteristic. The six protected classes recognized in USDA programs are race, color, national origin, age, sex, and disability.

PUBLIC NOTIFICATION SYSTEMS

Sponsors of the USDA meal programs are required to notify the public about the availability of their program in the following ways:

- Prominently displaying the "food source for all" poster in all offices where there is a USDA presence and where it may be read by customers.
- Including non-discrimination statements on all media mentioning USDA meal programs, including menus, flyers, internet pages, and other food-related program announcements.
- Providing information in other formats for those with disabilities. An example of this may be providing large print or braille menus for those who are visually impaired.
- Composing visual opportunities when using photographs to include a good representation of various ages, races, genders, etc.



CONTINUED ON BACK >>

Civil Rights Training
handout available on
Idaho CNP website

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Last year our state agency provided this training handout you may use to train the facility Frontline staff that interact with program participants. This would include teachers and volunteers that assist with meal service. This handout is available on the Idaho CNP website under the Civil Rights tab. To train your facilities and organization annually please use either the online civil rights training in the CNP training portal, the civil rights video or the PowerPoint located on the Idaho CNP website.

Civil Rights and Meal Accommodations



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.

This institution is an equal opportunity provider



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This is the long Nondiscrimination statement. Whenever the CACFP or USDA is mentioned or implied on Institution materials, the non-discrimination statement must be included on these published materials. Information that is directed to parents, employees, potential participants/employees or other public groups and that mentions the CACFP or USDA meals must also include the non-discrimination statement.

Informational materials that require the statement include but are not limited to: Employee handbooks, Enrollment and eligibility forms, Menus, Newsletters, Brochures, Parent handbooks, Print or broadcast advertisements, Websites and Flyers

If the material is too small to permit the full statement to be included, at a minimum include the short statement, in print size no smaller than the text.

“This institution is an equal opportunity provider.”

Civil Rights and Meal Accommodations



Annual Ethnic/Racial Participant Data

Idaho State Department of Education
Child and Adult Care Food Program
Civil Rights Data Collection Form for reporting
Actual and Potential Participants

Date of Count: _____
Provider or Center Name: _____
Provider or Center Address: _____
Center Director/Owner Name: _____

CATEGORIES

County totals are located on the Child Nutrition Program website <http://www.sde.idaho.gov/site/cnp> under Civil Rights, 2010 Census Data Sheet

HISPANIC OR LATINO: Number of Participants: _____	County Total: _____
NOT HISPANIC OR LATINO: Number of Participants: _____	County Total: _____
<hr/>	
BLACK OR AFRICAN AMERICAN: Number of Participants: _____	County Total: _____
ASIAN: Number of Participants: _____	County Total: _____
AMERICAN INDIAN & ALASKA NATIVE: Number of Participants: _____	County Total: _____
NATIVE HAWAIIAN OR OTHER PACIFIC ISLANDER: Number of Participants: _____	County Total: _____
WHITE: Number of Participants: _____	County Total: _____

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Annually Institutions are required to collect ethnic/racial data per participant for their center or each of their sponsored facilities. The data is reported in MyIdahoCNP in the Institutions' application packet on the Civil Rights form. The consolidated data must be maintained by the Institution for three years plus the current program year. During program reviews the state agency has found that some Institutions report the data when collected and consolidated but did not maintain the document(s) used to consolidate the data. It is recommended for Institutions that consolidate the data by hand (data is not in electronic data base with report options) the Institution use the Civil Rights Data Collection form provided by the state agency on the CNP website on the Civil Rights tab.

Civil Rights and Meal Accommodations



Medical Statement Form

MEDICAL STATEMENT
REQUEST FOR MEAL ACCOMMODATION DUE TO MEDICAL CONDITION:
A licensed physician, physician assistant, nurse practitioner, or dentist must sign this form (line 14)

(1) Name of Student/ Participant	(2) Date of Birth	(3) District/Organization	(4) School/Site
(5) Name of Parent /Guardian, or Auth. Rep.		(6) Telephone (Parent /Guardian, or Auth. Rep.)	

(7) Determination
By completing this form it was determined that the Student/Participant has a medical condition or is disabled and requires a special meal or accommodation based on the following criteria:
 The Americans with Disabilities Act (ADA) Amendments Act of 2008 made important changes to the meaning and interpretation of the term "disability." The changes demonstrated Congress's intent to restore the broad scope of the ADA by making it easier for an individual to establish that he or she has a disability. After the passage of the ADA Amendments Act, **most physical and mental impairments constitute a disability.** Therefore, rather than focusing on whether or not a participant has a disability, sponsors focus on working collaboratively with parents, guardians or participants to ensure an equal opportunity to participate in the Child Nutrition Programs and receive program benefits.
"Disabled person" Any person who has a physical or mental impairment which substantially limits one or more "major life activities", has a record of such impairment, or is regarded as having such impairment.
"Physical or mental impairment" means (1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech) organs, cardiovascular, reproductive, digestive, genitourinary, hemio and lymphatic, skin, and endocrine; or (2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.
"Major life activities" are broadly defined and include, but are not limited to, caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working. "Major life activities" also include the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions. (See 29 USC § 705(9) (b) and 42 USC § 12101.)

(8) Provide a brief description of student/participant's physical or mental impairment that substantially limits one or more major life activity:

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Idaho CACFP updated our Medical Statement form for Child Nutrition sponsors. It is provided on this slide and in your training packet. Let's review it now. This form is for medical conditions or disabilities that require meal or service accommodations in CACFP. This form should only be provided to parents if the substitution is due to a medical condition or disability. If a parent is requesting a meal accommodation due to preferences (religious, moral convictions or personal preferences) and the facility has a policy that they will make accommodations due to preferences, the facility must allow this for all participants in care.

It is important to note, once a center or day care receives a completed signed and dated form by a medical authority they must provide the recommended alternatives or substitutions until a new form is provided by a medical authority. For example: If the medical condition is allergy to milk, and a parent later states the center or home may now serve milk to their child, the center or day care home should request an updated medical statement from before making the changes to the child's meals. A medical authority made the determination for the allergy on the original medical statement form any changes should come from a medical authority to limit liability.

USDA Updates and Resources

USDA United States Department of Agriculture Food and Nutrition Service

Programs Data Newsroom Research Forms Grants

Child and Adult Care Food Program (CACFP)

How To Apply

- > Contact State Agency
- > Income Eligibility
- > Reimbursement Rates

Browse by Subject

- > Federal Register Documents
- > Legislation
- > Policy
- > STREAMLINE_CACFP!
- > Press Releases
- > Regulations
- > Guidance and Resources
- > CN Labeling
- > Food Safety
- > Research & Reports
- > Disaster Assistance

Other Resources

- > Capacity Builder Map
- > CACFP Handbooks
- > CACFP Meal Patterns

CACFP provides aid to child and adult care institutions and family or group day care homes for the provision of nutritious foods that contribute to the wellness, healthy growth, and development of young children, and the health and wellness of older adults and chronically impaired disabled persons.

Through CACFP, more than 4.2 million children and 130,000 adults receive nutritious meals and snacks each day as part of the day care they receive.

See how CACFP can make a difference in the quality of your program! Whether you are a provider in your home, at a day care center, in an afterschool care program, or in an emergency shelter, you will find many useful resources for serving nutritious meals and snacks.

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Let's review now USDA updates and resources. On USDA's website you can find information on the program: Income Eligibility forms in different languages, CACFP Meal Pattern, CACFP Handbooks, Building the Future poster, cookbooks for homes and centers, link to the interactive food buying guide, Nutrition and Wellness Tips for Young Children and links to Team Nutrition, MyPlate and Institute of Child Nutrition websites.

The Feeding Infant guide is still being revised to the new meal pattern requirements. The state agency will send a broadcast email when it is updated.

USDA Updates and Resources



Team Nutrition

- Team Nutrition Home
 - How To Apply
 - Become a TN School
 - Popular Topics
 - About Team Nutrition
 - MyPlate
 - Resource Library
 - Resource Order Form
 - HealthierUS School Challenge
 - Graphics Library
 - Training Grants
 - Local Wellness Policy
 - Webinars and Training
 - Spanish Materials
 - Other Useful Links
 - Team Up
 - E-Newsletter
 - Best Practices Sharing Center
 - Healthy Meals Resource System
 - Professional Standards

Team Nutrition is an initiative of the USDA Food and Nutrition Service to support the Child Nutrition Programs through training and technical assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity.

Spotlights

- CACFP Halftime: Thirty on Thursdays Training Webinars
- New! CACFP Meal Service Training Grants
- CACFP Meal Pattern Training Tools
- New! Available in Spanish: Discover MyPlate: Emergent Reader Mini Books

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Here is the Team Nutrition website where you can find the interactive food buying guide and mobile apps, CACFP Halftime: Thirty on Thursday training webinars, CACFP new meal pattern training tools-posters and worksheets, e-learning resources and recipes. There are several free resources you can order for your centers or homes from this site.



Here is the Institute of Child Nutrition website where you can find resources and trainings for your centers and homes. The institute has and is developing several trainings for CACFP. There are Face to Face training opportunities and online.

USDA Updates and Resources






United States Department of Agriculture
 What's Cooking? USDA Mixing Bowl

[About Us](#) | [Ask the Expert](#) | [Contact Us](#) | [En Español](#)

Home
Recipes
My Tools
USDA Foods Fact Sheets
Log In / Register




Household Recipes

Large Quantity Recipes

Recetas en Español

Fruit Kabobs with Yogurt Dip

Fruit kabobs make a colorful and fun snack that kids can help prepare.

Stay Connected

— Cookbooks —



The 2016 Healthy Lunchtime Challenge Cookbook

— Recipe Tools —



MY COOKBOOK

— Spotlights —



ChooseMyPlate.it

<https://whatscooking.fns.usda.gov/>
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And finally, here is What's Cooking- USDA mixing bowl website. This website has several recipes for centers and day care homes. Please note: The recipes on this site were standardized to produce a consistent product and yield but are not credited to the meal pattern at this time. You can use the Recipe Analysis Workbook in the Interactive Food Buying guide to credit it to the meal pattern. We will review how to use RAW later in this training.

USDA Updates and Resources



Policy Memo Updates

Policy Memo Summary Sheet

CACFP August 2017 - July 2018

*All Policy Memos are available on Idaho's Child Nutrition website at www.idaho.gov/ida/foods/state/guidance/. Institutions are responsible for staying current on new regulations and guidance. Please check this information on a regular basis.

Memo #	Memo Title	Memo Summary
FY 2018 Memos (Issued August 2017- July 2018)		
CACFP-13-2018	Child Nutrition Programs' Flexibilities for School Year 2018-2019	Provides Child Nutrition Program operators targeted flexibilities for milk, whole grains, and sodium requirements for SY 2018-2019. Effective July 1, 2018.
CACFP-12-2018	Child Nutrition Program Waiver Request Guidance and Protocol-Revised	Revises the current USDA FNS process for State agencies and eligible service providers seeking a waiver of statutory or regulatory program requirements for the CNP. This memorandum supersedes SP 27-2017, CACFP 12-2017, SFSP 08-2017, Child Nutrition Program Waiver Request Guidance and Protocol, dated April 26, 2017.
CACFP-10-2018	Conducting a Five-Day Reconciliation in the Child and Adult Care Food Program, with Questions and Answers	Highlight State flexibilities and local choices for complying with the five-day reconciliation requirement in the Child and Adult Care Food Program (CACFP) under 7 CFR 226.6(m)(4) and 226.16(d)(4), all reviews of day care homes and sponsored centers must include the reconciliation of meal counts with enrollment and attendance records for five consecutive operating days. USDA's Food and Nutrition Service (FNS) is issuing revised guidance to eliminate disparities and reduce duplication in this review process. This guidance supersedes CACFP 24-2016: Conducting Five-Day Reconciliation in the Child and Adult Care Food Program, with Questions and Answers, issued on Sept. 7, 2016.
CACFP-09-2018	Grain Requirements in the Child and Adult Care Food Program: Questions and Answers	Explains the grain requirements for the Child and Adult Care Food Program (CACFP) established in the final rule, "Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010." This revision further clarifies how to determine if a grain product meets the whole grain-rich criteria. This memorandum supersedes CACFP 01-2018, Grain Requirements in the Child and Adult Care Food Program: Questions and Answers, October 19, 2017.
CACFP-05-2018	Providing Child Nutrition Program Benefits to Disaster Survivor Evacuees	Provides a reminder overview of options available under current Program policy and regulation for connecting children and adult survivors, who have evacuated from areas subject to major disaster and emergency declarations, with Child Nutrition Program (CNP) benefits. Many survivors have evacuated as a result of the recent hurricanes and wildfires and Program operators are working hard to enroll and provide services for those evacuees. This memorandum does not contain new policy, instead it summarizes options available to school food authorities and institutions participating in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Child and Adult Care Food Program (CACFP), as they provide services to those in these very specific, circumstances.
CACFP-04-2018	Market Basket Analysis when Procuring Program Goods and Modifying Contracted-For Product Lists	Provides guidance to State Distributing Agencies and recipient agencies on the use of market basket analysis in procuring processed and products.

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In your packet is the Policy Memo Summary Sheet for all policy memos that were released since the last annual training. CACFP 13-2018 provides flexibilities to CACFP sponsors when serving flavored milk to children 6 and older. Beginning July 1, 2018 centers and homes may offer either nonfat or 1% flavored milk to children 6 and older.

CACFP 10-2018 provides a steam lined process for conducting the day care home 5 day reconciliation. Idaho's monitoring forms already provides this option to sponsors. Essentially rather than recording the enrollment, attendance and meal counts for the 5 days by child for day care homes the sponsor may now record aggregate data for the day.

In the next slide we will review CACFP 09-2018 in more detail. Are there any questions on any other policy memos released in the past year?

USDA Updates and Resources



CACFP 09-2018 Grain Requirements in CACFP

Whole Grain-Rich update-6 options

1. Product on any State's WIC whole grain food list
2. Product labeled "whole wheat" and has Standard Identity issued by U.S. FDA (certain breads and pastas)

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Let's review policy memo CACFP 09-2018, the most current CACFP grain requirements policy memo. The updated exhibit A grain chart is included in this policy memo and we also provided a separate copy of the Exhibit A in your training packet. Please note, beginning October 1, 2019 ounce equivalents will be implemented for grain products. Check out the difference between ounce equivalents and a serving. **DO: Review Exhibit A** One key update in this policy memo was the 6 options to determine if a grain is whole grain-rich. This policy memo is in your packet. In addition, the National Association of CACFP issued a one sheet handout for the 6 options that is in English and Spanish. It was reviewed and approved by USDA and is also provided in your packet. Lets review the handout. These are now the 6 options:

1. Product is on any State's WIC whole grain food list- please make sure you are only using the whole grain list.
2. Product labeled "whole wheat" and has Standard Identity issued by U.S. FDA (certain breads and pastas). The policy memo provided the bread and pasta FDA Standard of Identity that can be considered for this method. They are listed on the next slide.
3. Product includes one of two FDA approved whole-grain health claims on packaging

USDA Updates and Resources



FDA Standard of Identity

Breads with exact product names:

Whole wheat bread, entire wheat bread, graham bread, whole wheat rolls, entire wheat rolls, graham rolls, whole wheat buns, entire wheat buns, and graham buns

Pasta with exact product names:

Whole wheat macaroni product, whole wheat macaroni, whole wheat spaghetti, and whole wheat vermicelli

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Here are FDA Standard of Identity for certain breads with exact product names:

Whole wheat bread, entire wheat bread, graham bread, whole wheat rolls, entire wheat rolls, graham rolls, whole wheat buns, entire wheat buns, and graham buns

And certain pasta with exact product names:

Whole wheat macaroni product, whole wheat macaroni, whole wheat spaghetti, and whole wheat vermicelli

USDA Updates and Resources



CACFP 09-2018 Grain Requirements in CACFP

Whole Grain-Rich update- 6 options continued

3. Product includes FDA approved whole-grain health claim (CACFP sponsors only)

“Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers.”

Or

“Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease.”

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Whole Grain-Rich update- 6 options continued. The third option is the product includes one of two FDA approved whole-grain health claim. Note this option is only for CACFP sponsors.

The claims are:

“Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers.”

Or

“Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease.”

USDA Updates and Resources



CACFP 09-2018 Grain Requirements in CACFP

Whole Grain-Rich update- 6 options continued

4. The food meets the whole grain-rich criteria under NSLP (National School Lunch Program) excluding grain-based desserts that are not creditable in CACFP
5. The food meets FNS “Rule of Three”

Whole Grain-Rich update- 6 options continued. Option 4 is the food meets the whole grain-rich criteria under NSLP (National School Lunch Program) excluding grain-based desserts that are not creditable in CACFP.

The fifth option is the food meets FNS “Rule of Three”. Let’s review the rule of three a little more in the next slide.

USDA Updates and Resources



CACFP 09-2018 Grain Requirements in CACFP

FNS “Rule of Three” to determine whole grain-rich

The first ingredient (second after water) must be whole grain, and the next two grain ingredients (if any) must be whole grains, enriched, bran or germ. Grain derivatives may be disregarded and non-creditable grains labeled as 2 percent or less.

“Rule of Three” for ready to eat breakfast cereals

If the first grain ingredient is a whole grain and the cereal is fortified, the product meets the whole grain-rich criteria.

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Here is the definitions and guidance for FNS “Rule of Three” to determine whole grain-rich: For grain products and mix dishes with grains- The first ingredient (second after water) must be whole grain, and the next two grain ingredients (if any) must be whole grains, enriched, bran or germ. Grain derivatives may be disregarded and non-creditable grains labeled as 2 percent or less.

The policy memo provides a list of whole grains, disregarded ingredients and non-creditable grains or flours. Please note the lists are not exhaustive. If you see a product not listed please contact the state agency for guidance.

The “Rule of Three” for ready to eat breakfast cereals is a little different: If the first grain ingredient is a whole grain and the cereal is fortified, the product meets the whole grain-rich criteria.

USDA Updates and Resources



CACFP 09-2018 Grain Requirements in CACFP

Whole Grain-Rich update-6 options continued

6. Proper documentation from manufacturer or standardized recipe demonstrates whole grains are primary grain ingredient by weight.

Product Formulation Statement from Manufacturer is proper documentation for commercially prepared product.

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And the 6th and final option is proper documentation from manufacturer or standardized recipe demonstrates whole grains are primary grain ingredient by weight.

A Product Formulation Statement from the Manufacturer is proper documentation for commercially prepared product.

Are there any questions?

USDA Updates and Resources



FY 2018 CACFP Meal Service Training Grants for State Agencies

- \$100,000 Noncompetitive grant
- Grant period is 2 years
- In person and online training methods
- Institutions and facilities may participate

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This year USDA released CACFP Meal Service Training Grants for State agencies to train Institutions and facilities in their state on the meal pattern and meal service requirements. State agencies applied in May 2018 and will be notified of award by September 2018. The grant will begin October 1, 2018 and will be for a 2 year period. The award amount is \$100,000 and may be used for both regional in person trainings and online trainings. Idaho will be issuing a survey for the grant training in Fall of 2018 to receive input on the best locations and times to have regional trainings.

Annual training in August 2019 will be 2 full days with one day specific to meal pattern and service for the grant. Facilities (homes and centers) may attend this day of training as well. All in person trainings will be placed in the CNP training portal as online trainings.

USDA Updates and Resources



USDA CACFP Training Cooperative Agreement- MH Miles

Training Topics:

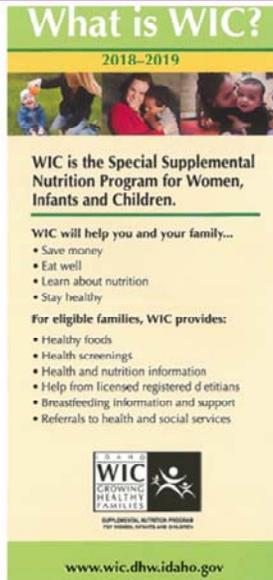
- Financial Viability, Capability and Accountability (VCA)
- Budgets
- Claim Record Keeping Requirements
- Application
- Monitoring
- Internal Controls
- Serious Deficiency Process

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USDA has a training agreement with MH Miles to develop training for State agencies to provide to Institutions. MH Miles will present the training to State agencies in Fall of 2018 and each State will be able to implement the trainings by Summer of 2019. Idaho is currently planning to offer this training or a portion of it at the annual training in August 2019. Training topics are:

Financial Viability, Capability and Accountability (VCA)
Budgets
Claim Record Keeping Requirements
Application
Monitoring
Internal Controls
Serious Deficiency Process

USDA Updates and Resources



WIC Information

Important:
Please share information about other nutrition programs with the center and home families

WIC flyers are available at your local WIC Office

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The current WIC information flyer is located in your training packet. It is important each Institution shares information about other nutrition programs with center and day care home families. This may be as easy as providing the cards to each facility for the center or providers to give out to their participant families. WIC flyers are available at your local WIC office as well.

USDA Updates and Resources



DUNS Number and SAM Registration



Quick Start Guide For Screen Readers in SAM

Helpful Information

SAM is the official **free, government-operated website** – there is **NO** charge to register or maintain your entity registration record in SAM.

What is a screen reader?

A screen reader is a software application that attempts to identify and interpret what is being displayed on the screen.

Quick Tips for JAWS Screen Readers

- JAWS starts reading from the top of SAM.gov
- The insert function key allows users to navigate to areas in SAM that otherwise would take multiple tabs to access. It does not, however, read buttons. You can use the tab

Steps to Create an Account in SAM

1. Go to SAM by typing www.sam.gov in your internet browser address bar. Make sure the web site you go to ends in .gov
2. From the SAM Homepage tab to and select the Create User Account button.
3. On the Create Account Page, tab to and select the Create an Account button to create an account to register your entity.
4. On the Personal Information page, enter the data for the mandatory fields and navigate to the Next button.
5. On the Account Information page, enter the username and password information.
6. After your account creation has completed you will need to log into the email account provided to activate the account.

Steps to Register in SAM

1. Go to www.sam.gov and log in by using the tab key until the screen reader identifies the username and password. Use the enter key to confirm log in once username and password have been typed into the text fields.
2. Once you are logged into SAM, there will be a Terms & Conditions page. In order to decline or accept the statement, use the tab key to navigate to the accept or decline buttons. Once you have tabbed to the correct button, select using the enter key. The Terms & Conditions page automatically appears every time you log into

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The federal government requires that all applicants for Federal grant agreements have a Data Universal Number System (DUNS) number.

In addition to obtaining a DUNS number, each sponsor must annually register their number in the System for Award Management (SAM). It is important this is completed annually before the beginning of the next fiscal year (October 1).

USDA Updates and Resources



2018-19 CACFP Application Updates

MYIDAHO CNP

Idaho CACFP Annual Update

CACFP Annual Update:	Mandatory Independent Center (IC)	For-profit Independent Center (IC)	Nonprofit Organization of Centers (SOC) - Affiliated & Unaffiliated	Nonprofit Organization of Day Care Homes (SODCH)
Update each column in MyIdahoCNP				
Sponsor Application	x	x	x	x
Civil Rights Information	x	x	x	x
Board of Directors	x	N/A	x	x
Sponsor Budget Form	x	x	x	x
Sponsor Management Plan	x	x	x	x
Checklist				
Attach all checklist documents electronically in MyIdahoCNP under the sponsor or site(s) checklist	x	x	x	x
Site in Provider Application(s)	x	x	x	x
Excel Budget Workbook: Send Electronically to khunter@ida.idaho.gov				
Excel Budget and supporting documents	x	x	x	x
If you need further assistance or have questions please contact the state agency at 208-335-4821.				
Important CACFP Annual Update Due Dates:				
• June 1 st	IC and SOC Excel Budget Workbook and supporting documents			
• August 1 st	SODCH Excel Budget Workbook and supporting documents			
• August 15 th	For Profit IC & SOC Application Updates in MyIdahoCNP & Checklist Documents (Must submit packet for approval in MyIdahoCNP by due date)			
• September 15 th	Non Profit IC, SOC & SODCH Application Updates in MyIdahoCNP & Checklist Documents (Must submit packet for approval in MyIdahoCNP by due date)			
Reminders:				
1. Civil Rights Information is due at the same time the sponsor application packet is due in MyIdahoCNP.				
2. Enrollment Eligibility data must be submitted MONTHLY for all sponsors. For the site Application annual update, the most current complete month's site data must be reported in each site application.				
Example: If the sponsor is completing the application packet in August, the sponsor will report in each site application July's enrollment eligibility data for that site.				
This institution is an equal opportunity provider. 2018 CACFP Annual Mandatory training 76				

It is that time of year again to update your application with the state agency. The 2018-19 application packets are ready in MyIdahoCNP. A few have already taken advantage of the early release of the new program year packets and completed the process. Great Job! It is important packets are submitted for approval by the due dates so the packets can be approved by October 1, 2018 for the new program year.

Up coming due dates coming up are:

August 15th- For-profit Institution application packets due

September 15th- Nonprofit Institution application packets due

If you need to submit a budget amendment for the current program year please submit your amended FY18 budget workbook to Kim Huntley via email by September 1, 2018.

Lunch Break



**STARTING
BACK
AT
1:00 PM**

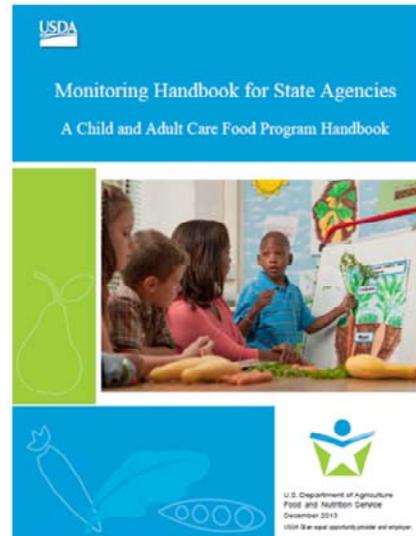
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Lunch Break, let's start back at 1:00 pm

(or in 1 hour depending on what time it is when presenter reaches this slide)

At lunch set up food boards, manufacturer table with PDF's and CN labels and set out flip chart paper with activity packets (10 per training)

Common Findings on Program Reviews



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I hope everyone enjoyed their lunch. We are going to continue with the next training topic of common findings on program reviews by the state agency. These are findings from the past two years. In the past year, any finding on the new meal pattern requirements only resulted in corrective action and technical assistance. Beginning October 1, 2018 if any meals or snacks that do not meet the new meal pattern requirements will be disallowed unless USDA provides additional guidance to the state agency on the transition period. Sponsoring organizations will also be required to disallow meals or snacks that do not meet the new meal pattern requirements.

Common Findings on Program Reviews



- Daily meal counts claimed higher than daily attendance or meals claimed for children not recorded in attendance
- Children only participating in At-risk afterschool program in claim month included on eligibility roster
- Eligibility data; free, reduced and paid reported in claim did not match IEF verification or enrollment eligibility roster
- Incomplete or missing enrollment forms
- Claim edit checks; enrollment, attendance, meal counts, menu records

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Here are the most common findings on state agency CACFP reviews.

- Daily meal counts claimed higher than daily attendance or meals claimed for children not recorded in attendance. It is important to verify meal counts to attendance records daily. Some of these findings are from claim reviews but also occurred at site reviews in the five day reconciliation. Remember if this is a finding on a site monitoring visit, corrective action is required by the center or day care home.
- Children only participating in At-risk afterschool program in a claim month were included on the eligibility roster. This occurred in child care centers that have children enrolled for child care and school age children participating in At-risk program. The eligibility roster data is only for the child care claim.
- Eligibility data; free, reduced, paid reported in claim did not match Income Eligibility Form verification or monthly enrollment eligibility roster data.
- Incomplete or missing enrollment forms. Enrollment forms must be updated and completed annually.
- Claim edit checks; enrollment, attendance, meal counts, menu records. Sponsors are not completing edit checks before submitting the claim. In facilities where enrollment is required; participant must have a current enrollment form. No more meals then participants recorded in attendance can be claimed and menus must meet the meal pattern. Facilities must maintain all menu records that support meals met the meal pattern.

Common Findings on Program Reviews



- CACFP and civil rights training was not provided annually to all required site, provider or organization staff
- Non-creditable foods served as a food component-example: cream cheese for meat/meat alternate
- Whole grain-rich grain was not offered daily
- Grain based desserts served as grain component
- Missing menu records-CN labels, Product Formulation Statements (PFS) or Standardized Recipes

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- CACFP and civil rights training was not provided annually to all required center, provider or organization staff.
- Non-creditable foods served as a food component-example: cream cheese for meat/meat alternate
- Whole grain-rich grain was not offered daily- corrective action and TA this year only since new meal pattern requirement
- Grain based desserts served as grain component- corrective action and TA this year only
- Missing menu records-CN labels and Product Formulation Statements (PFS) were the most common missing records. Several sites had recipes but not all recipes were credited to the meal pattern.

Menu Record Requirements



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Since one of the common findings was for missing some of the menu records let's review the menu records requirements for CACFP.

Menu Record Requirements



Menu Records –are required to document the CACFP meal pattern 7 CFR 226.20

- *How daily meals and snacks contribute to each menu component in the meal pattern*
- *That enough food was planned/prepared for each menu component served to meet the minimum serving per age group*



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Menu records also referred to as meal pattern menu compliance records or food service records are required to document daily how meals and snacks served contributes to each menu component in the meal pattern. The record provides supporting documentation for each meal and snack claimed for reimbursement and confirms the center or day care home provider planned, prepared and served enough of each menu component to meet the minimum servings per age group.

Menu Records Requirements



- Daily dated Menus
- Standardized recipes
- Product nutrition fact labels including ingredient lists
- CN labels and product formulation statements
- Food receipts/invoices (centers only)
- Monthly food inventory records (centers only)

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Meal pattern menu records must be maintained in written or electronic format and must be made available to SDE or USDA during program reviews with the Institution and during monitoring visits with the center or day care home. The following meal pattern menu compliance records are required:

- Daily dated menus;
- Standardized recipes;
- Product nutrition fact labels including ingredient list;
- CN Labels and manufacturer's Product Formulation Statements (PFS);
- Food receipts/invoices must be maintained by centers only and we already reviewed some of the findings with receipts in the budget section of this training.
- Monthly food inventory is also for centers only. It is important to maintain a monthly food inventory to determine the cost of food used. This is a requirement per FNS 796-2 revision 4.

Next we will review the first four menu records listed and then do a few activities using these records.

Menu Records Requirements



Daily Dated Menus

- Individual Infant Menu records-required for centers and day care homes

DAILY INFANT MENU RECORD FOR 6 - 11 MONTH OLD INFANTS DATE: _____

- 1) Record date (month/day/year).
- 2) Record the name & birthdate of each infant.
- 3) Specify the name of the formula (Document the brand of formula for each meal/snack. Leave blank if infant receives breast milk).
- 4) Record if the infant is receiving formula "F", expressed breast milk "EB", or is breastfed onsite by the mother "BF" for each meal/snack.
- 5) Record actual food offered for each meal/snack (examples: peaches, rice cereal). A serving of the food components are required when the infant is developmentally ready to accept it.
- 6) Designate food and/or formula supplied by parent/guardian for each meal/snack as parent supplied, "PS". Example: "PS, peaches".

NAME OF INFANT Birthdate Brand of Formula	BREAKFAST			LUNCH OR SUPPER			AM or PM SNACK			
	Breast milk or Formula 6-8 oz.	Infant cereal, meat, fish, poultry, whole egg, dry beans or peas 0-4 Tbsp. Cheese 0-2 oz. Cottage cheese or yogurt 0-2 oz. (drainage) One or Combination	Veg. and/or Fruit 0-2 Tbsp.	Breast milk or Formula 6-8 oz.	Infant cereal, meat, fish, poultry, whole egg, dry beans or peas 0-4 Tbsp. Cheese 0-2 oz. Cottage cheese or yogurt 0-2 oz. (drainage) One or Combination	Veg. and/or Fruit 0-2 Tbsp.	Breast milk or Formula 2-4 oz.	Bread 0-1/2 slice or Crackers 0-2 or infant cereal or ready-to-eat cereal 0-4 Tbsp.	Veg. and/or Fruit 0-2 Tbsp.	Complete Snack (Served)
Birthdate: _____ Formula: _____							AM			
							PM			
Birthdate: _____ Formula: _____							AM			
							PM			

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Let's review the daily dated menu records for both centers and day care homes. The first is the Individual Infant menu record as seen on this screen. This is the sample state agency form facilities may use and is available in MyIdahoCNP in download forms. It is important infant menu records are maintained for each individual infant since infants eat on demand and consume different food items and formula or receive breast milk.

Menu Records Requirements



Day Care Home Daily Menu Record

Sample Day Care Home Daily Menu Record

Month/Year:	Minimum Serving Size by Age Group				Provider Name: _____				
	1-2	3-5	6-12	13-18	Monday	Tuesday	Wednesday	Thursday	Friday
					Date:	Date:	Date:	Date:	Date:
Breakfast									
Milk	1/2 cup	3/4 cup	1 cup	1 cup					
Fruit/Vegetable	1/4 cup	1/2 cup	1/2 cup	1/2 cup					
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv					
M/M Alternate- optional	1/2 oz	1/2 oz	1 oz	1 oz					
Lunch									
Milk	1/2 cup	3/4 cup	1 cup	1 cup					
Fruit	1/8 cup	1/4 cup	1/4 cup	1/4 cup					
Vegetable	1/8 cup	1/4 cup	1/2 cup	1/2 cup					
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv					
Meat/Meat Alternate	1 oz	1 1/2 oz	2 oz	2 oz					
Snack									
Milk	1/2 cup	1/2 cup	1 cup	1 cup					
Fruit	1/2 cup	1/2 cup	3/4 cup	3/4 cup					
Vegetable	1/2 cup	1/2 cup	3/4 cup	3/4 cup					
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv					
Meat/Meat Alternate	1/2 oz	1/2 oz	1 oz	1 oz					
Water (if milk or juice is not component of snack-optional)									

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Here is a sample of a Day Care Home Daily Menu Record and is available in MyIdahoCNP in download forms. The record includes and must document:

Date (month, day, year)

Provider name

The type of meal (breakfast, lunch, supper, or snack)

Minimum serving sizes per age group

Actual food items served each day

Type of milk served each day (whole, 1% or nonfat and if the milk is flavored – nonfat or 1%)

CP (Commercially Prepared) or HM (Home Made) notations

WG (Whole grain rich) notation

Menu Records Requirements



Center Daily Detailed Menu Record

Sample Center Daily Menu Record

Month/Year:	Minimum Serving Size by Age Group				Center Name:																			
	1-2	3-5	6-12	13-18	Monday				Tuesday				Wednesday				Thursday				Friday			
					Date:																			
					1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18
Breakfast	Age Groups				Planned/Prepared																			
	Served																							
Milk	1/2 cup	3/4 cup	1 cup	1 cup																				
Fruit/Vegetable	1/4 cup	1/2 cup	1/2 cup	1/2 cup																				
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv																				
M/M Alternate- optional	1/2 oz	1/2 oz	1 oz	1 oz																				
Lunch	Age Groups				Planned/Prepared																			
	Served																							
Milk	1/2 cup	3/4 cup	1 cup	1 cup																				
Fruit	1/8 cup	1/4 cup	1/4 cup	1/4 cup																				
Vegetable	1/8 cup	1/4 cup	1/2 cup	1/2 cup																				
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv																				
Meat/Meat Alternate	1 oz	1 1/2 oz	2 oz	2 oz																				

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The center daily menu record requires a little more information than a day care home provider daily menu. This slide shows an example of a center daily detailed menu record. Centers may also choose to use a daily menu production record in place of the daily detailed menu. Samples of both records are available in MyIdahoCNP in download forms.

- The detailed menu records must document:
 - Date (month, day, year the meals were served)
 - Site location(s)
 - Serving sizes by each age group for all required components
 - Actual food items served each day
 - Type of milk served each day (whole, 1% or nonfat and if the milk is flavored – nonfat or 1%)
 - Substitutions made to the planned menu
 - CP (Commercially Prepared) or HM (Home Made) notations
 - WG (Whole grain rich) notation
 - Name of recipe matching the item on the menu
 - Planned number of portions per age group
 - Prepared number of portions per age group
 - Served number of portions per age group

Menu Records Requirements



Standardized Recipes

Standardized Recipe Form

Recipe Name _____ Category _____ Recipe # _____
 (i.e., entrée, breads)

HACCP Process: _____ 1 – No Cook _____ 2 – Cook & Same Day Serve _____ 3 – Cook, Cool, Reheat, Serve _____ 4 – SOP Controlled _____

Ingredients	For _____ Servings		Directions: Include step by step instructions, the critical control points (CCP-specific points at which a hazard can be reduced, eliminated or prevented) and critical limits (time and/or temperature that must be achieved to control a hazard).
	Weight	Measure	

Serving Size _____ Pan Size _____
 Yield _____ Number of Pans: _____

Oven Temperature & Baking Time:
 Conventional Temperature _____ Minutes _____
 Convection Temperature _____ Minutes _____

Meal Pattern (Based on Serving Size): _____
 _____ Meat/Meat Alternative
 _____ Fruit
 _____ Vegetable
 _____ Grains/Breads

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When serving homemade menu items the center or home must have a standardized recipe to credit the components of the recipe to the meal pattern. This is a Standardized Recipe form provided at previous training and is available in MyIdahoCNP download forms. The form has instructions on the back for standardizing recipes. It is a common finding on reviews that centers and homes do not use or maintain standardized recipes. In addition, when a center or home has a recipe on file, it is incomplete, usually missing the serving size, recipe yield and how the recipe credits to the meal pattern.

USDA also developed a Recipe Analysis Workbook in the interactive food buying guide that may be used to document a standardize recipe with the actual foods purchased and determine how the recipe credits to the meal pattern. If a center or day care home do not want to standardize their own recipe they may use recipes from FNS, ICN Team Nutrition or the New Menu Tool Kit that are already standardized.

Menu Records Requirements



USDA Recipe Analysis Workbook (RAW)



APPENDIX A

Instructions: How to Use the Recipe Analysis Workbook

- About the Recipe Analysis Workbook
- Steps to complete the Recipe Analysis Workbook (Figures 1a-1g)
- Vegetable (with Subgroups) Contribution Worksheet (Figure 1a)
- Fruit Contribution Worksheet (Figure 1b)
- Meats/Meat Alternates Contribution Worksheet (Figure 1c)
- Grains Contribution Worksheets
- Recipe Analysis Workbook templates

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The *Recipe Analysis Workbook* is a tool used to determine the expected meal pattern contribution and crediting statement for a recipe. The *Recipe Analysis Workbook* consists of a worksheet for each meal component. The worksheets, in hard copy format can be found in the "Recipe Analysis Workbook templates" section below. This workbook is a tool for calculating the meal pattern contribution of a recipe's ingredients toward the vegetable (expressed in subgroups), fruit, meat/meat alternates, and grains components of the Federal meal pattern requirements.

Determining meal pattern contributions for recipes is an important step in ensuring that meals served are nutritious and meet Federal meal pattern requirements

It is important to note, in order to use RAW you must create a login access to the Interactive Food Buying Guide.

Menu Records Requirements



USDA Food Buying Guide for Child Nutrition Programs
U.S. DEPARTMENT OF AGRICULTURE

HOME • MEAL COMPONENTS • FOOD ITEMS • TOOLS • APPENDICES • HELP • ADMINISTRATION • WELCOME, DEBBA EISENBERG

Create Recipe Analysis Workbook (RAW)

Instructions

Address (*) Denote required information

Recipe Name* Harvest Delight Servings per Recipe* 25
Recipe Number* 3211 Serving Size* 1/2 cup

Select Checkable Ingredients: Vegetables, Fruit, Meats/SEA, Grains - Method A, Grains - Method B, Grains - Method C, Meal Pattern Contribution

Use this tab to select ingredients from the FBG. Use Grains - Method A tab to select ingredients from Exhibit A and use Grains - Method C tab to input ingredients for Grains Based on Grams of Creditable Grains. (For further guidance see Instructional section above)

Search Food Ingredients

Keywords:

Meal Component: All Meal Components

Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, SP	Serving Size per Meal Contribution	Action

To Create a Recipe

- Select Tools
- Select Create RAW
- Type in *Recipe Name, Recipe Number, Servings per Recipe and Serving Size*

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To create a recipe in RAW select Tools on the green task bar, in the drop down select Create RAW and you will get to the screen on this slide. Start by adding the recipe name, recipe number (you can create this number), servings per recipe (this is the yield) and serving size. In this example the recipe is Harvest Delight, serving is 25 and serving size is ½ cup.

Menu Records Requirements



Search Food Ingredients

Keywords
sweet potatoes

Meal Component
All Meal Components

Category
All Categories

Search Reset

Food Ingredients Selected for Recipe

Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Action
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Adding Ingredients to Recipe

- Use Search Food Ingredients
- Select the products to add to your recipe based on how you will purchase it
- Select “Add”

Search Results

Meal Component	Category / Subcategory	Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Add to recipe
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, fresh Whole, Includes USDA Foods	Pound	5.69	1/4 cup baked vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, fresh Whole, Includes USDA Foods	Pound	5.69	1/4 cup baked, mashed vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, fresh Whole, Includes USDA Foods	Pound	5.69	1/4 cup mashed, sweet vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Cut, Peeled in 4oz cans, Includes USDA Foods	96.10 OZ (3.00 CT)	21.00	1/4 cup mashed, drained vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Cut, Peeled in 4oz cans, Includes USDA Foods	96.2-110 OZ (3.40 CT)	12.20	1/4 cup mashed, drained vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Cut, Peeled in 4oz cans, Includes USDA Foods	96.300 OZ (3.19 CT)	9.19	1/4 cup mashed, drained vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Mashed, Includes USDA Foods	96.10 OZ (3.00 CT)	43.10	1/4 cup mashed vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Whole, Includes USDA Foods	96.10 OZ (3.00 CT)	21.10	1/4 cup mashed, drained vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Whole, Includes USDA Foods	96.2-110 OZ (3.40 CT)	12.20	1/4 cup mashed, drained vegetable	Add
Vegetables	Non-Orange Vegetables SWEET POTATOES	Sweet Potatoes, canned Whole, Includes USDA Foods	96.300 OZ (3.19 CT)	9.19	1/4 cup mashed, drained vegetable	Add

To add ingredients to your recipe use the search food ingredients section in RAW. Type in the food you are searching for, select the food item based on how you will purchase it for the recipe and select “Add”. In this example the food item they were searching for was sweet potatoes. In the interactive food buying guide there are several options and they selected Sweet Potatoes Fresh.

Continue this process until you have added all food items for your recipe.

Menu Records Requirements



Select Creditable Ingredient	Vegetables	Fruit	Meats/MA	Grains - Method A	Grains - Method B	Grains - Method C	Meal Pattern Contribution
Dark Green Vegetables							
Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Additional Information	Quantity of Ingredient	Preparation Yield (if applicable)	Calculated Quantity to Purchase
Spinach, fresh (not frozen)	Pound	7.50	1/4 cup cooked, drained vegetable	1 lb AP = 0.80 lb ready-to-cook or 0.80 lb (80%) ready	0.24275	0.80	0.2988
Red/Orange Vegetables							
Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Additional Information	Quantity of Ingredient	Preparation Yield (if applicable)	Calculated Quantity to Purchase
Carrots, fresh without tops	Pound	6.16	1/4 cup cooked, drained, sliced vegetable (3/16 inch slices)	1 lb AP = 0.76 lb (cooked 2 cups) cooked, sliced carrots; 1 lb AP = 0.83 lb (cooked 2-2/3 cups) trimmed, peeled, sliced carrots	1.5	0.83	1.8072
Spinach, Winter, fresh (cut into 1/2 inch)	Pound	7.50	1/4 cup cooked, drained, sliced vegetable	1 lb AP = 0.84 lb ready-to-cook (sliced)	1.5	0.8	1.8750
Sweet Potatoes, fresh (whole tubers 1/2 lb. each)	Pound	9.10	1/4 cup cooked, sliced vegetable	1 lb AP = 0.80 lb (peeled ready-to-cook sweet potatoes)	1.5	0.84	1.8657
Other Vegetables							
Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Additional Information	Quantity of Ingredient	Preparation Yield (if applicable)	Calculated Quantity to Purchase
Onions, Yellow, fresh (diced, ready-to-use)	Pound	12.80	1/4 cup diced, raw vegetable	1 lb AP = 1 lb (peeled 2.15 cups) ready-to-use (1/4" dice, 1 1/2-1 3/4" dice onion)	0.5	0.2000	0.5000

Determining Quantity to Purchase

- Select Component groups for all ingredients added
- Add Quantity of Ingredient from recipe for each food item
- Add Preparation Yield if applicable for each food item

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Once all food items are added select the food components for all ingredients that were added. For example: Sweet potatoes was one food item added to this recipe. Sweet potatoes are a vegetable component so you would select Vegetable on the tool bar for RAW. Under Sweet Potatoes you will enter the quantity listed in your recipe for sweet potatoes in the Quantity of Ingredient column. In this example, the quantity needed is 1.5 lbs. so they entered 1.5. For the sweet potato selected 1 lb. as purchased is .80 lb. peeled and ready to cook so you would enter .80 under Preparation Yield. The system will then calculate the quantity of sweet potatoes you will need to purchase.

Continue this process for all food items you added for your recipe

Menu Records Requirements



Recipe Analysis Workbook (RAW)

Recipe Name* Harvest Delight Servings per Recipe* 25
Recipe Number* 12tr Serving Size* 1/2 cup

Select Creditable Ingredient Vegetables Fruit Meats/MA Grains - Method A Grains - Method B Grains - Method C **Meal Pattern Contribution**

Vegetables	Additional Vegetables	1/8 cup
Vegetables	Dark Green Vegetables	0 cup
Vegetables	Red/Orange Vegetables	3/8 cup
Vegetables	Other Vegetables	0 cup
Fruit		1/8 cup

1/2 cup provides 1/8 cup additional vegetable, 3/8 cup red/orange vegetable, 1/8 cup fruit

Meal Pattern Contribution

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Now that all food items are added to your recipe in RAW and you entered the quantities for each ingredient select Meal Pattern Contributions to see how your recipe will contribute to the meal pattern components. RAW does separate vegetables by sub groups. A 1/2 cup serving of this recipe will yield 3/8 cup vegetables and 1/8 cup fruit.

It is important to save your recipes in RAW for future use. To access your saved recipes and print them select Tools on the green task bar and in the drop down select My RAW Recipes List.

Menu Records Requirements



Product Nutrition Facts Labels with Ingredient Lists

Labels are used to determine if product is creditable and serving size per age

Nutrition Facts	
Serving Size 26 Crackers (30g) Servings Per Container About 13	
Amount Per Serving	
Calories 140	Calories from Fat 45
% Daily Value*	
Total Fat 5g	10%
Saturated Fat 1.5g	3%
Trans Fat 0g	
Polyunsaturated Fat 2g	
Monounsaturated Fat 1g	
Cholesterol less than .5mg	1%
Sodium 160mg	8%
Total Carbohydrate 20g	4%
Dietary Fiber less than 1g	2%
Sugars 0g	
Protein 3g	
Vitamin A 2% • Vitamin C 0% • Calcium 0% • Iron 6%	
* Percent Daily Values are based on a diet of other people's misdeeds.	
Your daily values may be higher or lower depending on your calorie needs.	
Calories 2,000 2,500	
Total Fat	Less than 65g 65g
Sat. Fat	Less than 20g 25g
Cholesterol	Less than 300mg 300mg
Sodium	Less than 2,400mg 2,400mg
Total Carbohydrate	300g 375g
Dietary Fiber	25g 25g
Sugars	25g 25g
Crackers per gram: Fat 0 • Carbohydrate 4 • Protein 4	
INGREDIENTS: ENRICHED FLOUR (WHEAT FLOUR, NIAGIN, REDUCED IRON, THIAMIN MONONITRATE (VITAMIN B1), RIBOFLAVIN (VITAMIN B2), FOLIC ACID), SOYBEAN OIL WITH TBHQ FOR FRESHNESS, WHITE CHEDDAR CHEESE (MILK, CHEESE CULTURES, SALT, ENZYMES), CONTAINS TWO PERCENT OR LESS OF SALT, PAPRIKA, LEAVENING (YEAST, BAKING SODAS), MONOGLYCERIDES, TURMERIC EXTRACT FOR COLOR, ANNATTO COLOR, SOY LECITHIN.	
CONTAINS WHEAT, MILK AND SOY INGREDIENTS.	

EXHIBIT A: GRAIN REQUIREMENTS FOR CHILD NUTRITION PROGRAMS^{1,2}

Color Key: Footnote 5 = Blue, Footnote 3 or 4 = Red

Group A	Ounce Equivalent (Oz Eq) for Group A	Minimum Serving Size for Group A
<ul style="list-style-type: none"> Bread type coating Bread sticks (hard) Chow Mein noodles Savory Crackers (saltines and snack crackers) Croutons Pretzels (hard) Stuffing (dry) Note: weights apply to bread in stuffing. 	1 oz eq = 22 gm or 0.8 oz 3/4 oz eq = 17 gm or 0.6 oz 1/2 oz eq = 11 gm or 0.4 oz 1/4 oz eq = 6 gm or 0.2 oz	1 serving = 20 gm or 0.7 oz 3/4 serving = 15 gm or 0.5 oz 1/2 serving = 10 gm or 0.4 oz 1/4 serving = 5 gm or 0.2 oz
Group B	Oz Eq for Group B	Minimum Serving Size for Group B
<ul style="list-style-type: none"> Bagels Batter type coating Biscuits Breads - all (for example sliced, French, Italian) Buns (hamburger and hot dog) Sweet Crackers³ (graham crackers - all shapes, animal crackers) Egg roll skins English muffins 	1 oz eq = 28 gm or 1.0 oz 3/4 oz eq = 21 gm or 0.75 oz 1/2 oz eq = 14 gm or 0.5 oz 1/4 oz eq = 7 gm or 0.25 oz	1 serving = 25 gm or 0.9 oz 3/4 serving = 19 gm or 0.7 oz 1/2 serving = 13 gm or 0.5 oz 1/4 serving = 6 gm or 0.2 oz

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The next menu record is Product Nutrition Facts labels for grains including cereals, yogurt and non-dairy beverages are necessary for day care homes and centers to determine if the product is creditable and the correct serving size is provided per age group to meet the meal pattern requirements. The labels support the meals and snacks claimed for reimbursement met the meal pattern requirements and are reviewed by the state agency during program reviews when verifying the claim.

Menu Records Requirements



CN Labels Verification Report



United States Department of Agriculture

5/6/2016

Child Nutrition(CN) Label Verification Report

CN #	Product Description	Serving Size	CN Crediting	Expiration	Est #	Company
024815	FARMLAND SILVER MEDAL BRAND HOT DOGS	One 2.00 oz. Frank	2.00 oz. Equivalent Meat	07/21/19	717W	FARMLAND FOODS INC.
024860	FARMLAND GOLD MEDAL HOT DOG	One 2.00 oz. Frank	2.00 oz. Equivalent Meat	07/21/19	717W	FARMLAND FOODS INC.
025745	GOURMET SCRAMBLED EGG SYSTEM FROZEN EGG PRODUCT	One 1.00 lb. Mix	14.03 oz. Equivalent Meat Alternate	03/01/21	420	MICHAEL FOODS, INC
029902	FARMLAND SILVER MEDAL BRAND HOT DOGS	One 1.60 oz. Hot Dog	1.50 oz. Equivalent Meat	07/21/19	717W	FARMLAND FOODS INC.

Resource can be found on the FNS website.

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CN Labels and Product Formulation Statements are the fourth menu record on the list. This is a CN Label Verification Report that was developed to assist State agency reviewers, CN program operators, and food industry to verify the status of a CN Label and the validity of a CN Label copied with a watermark. It does not replace the requirement to maintain CN labels. Day care homes and centers may maintain the CN Label from the original container, a photo of the label on the container or a watermark copy with attached bill of lading (invoice).

This verification report can be found on the FNS website.

Menu Records Requirements



Manufacturer Product Formulation Statements

Must be on the manufacturer's letterhead and include:

- Product name and product code
- A description of all ingredients as listed in the FBG for CNP, i.e. grain products must be specified whole grain or enriched;
- The ingredient weight per serving of each ingredient to be credited;
- The weight of ingredients specified as raw or cooked weight; and
- The weight or volume of the product serving size, or the number of pieces per serving.
- Manufacturer's authorized individual name, signature and telephone number
- Detailed breakdown of how the product credits toward each component of the meal

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The product formulation statement for a commercially prepared combination food product must be on the manufacturer's letterhead and include:

- Product name and product code
- A description of all ingredients as listed in the Food Buying Guide for Child Nutrition Programs, i.e. grain products must be specified whole grain or enriched;
- The ingredient weight per serving of each ingredient to be credited;
- The weight of ingredients specified as raw or cooked weight; and
- The weight or volume of the product serving size, or the number of pieces per serving.
- Manufacturer's authorized individual name, signature and telephone number
- Detailed breakdown of how the product credits toward each component of the meal.

Menu Record Activities



Next we will do a few menu record activities to create a menu collage using daily menus, standardized recipes, nutrition facts and ingredient labels, CN labels and Product Formulation statements. In order to plan daily menus in facilities each of these records must be completed or obtained before implementing the menus.

For each activity you will work in teams. Let's count off by 10.

Do: Have all 1's go to one table, all 2's to the next table etc. through 10. Give each table flip chart paper, markers, post it notes, calculators, pens, tape, and activity packet (week menu record sheet, daily menu record sheet, recipes, exhibit A Grain Chart, sugar limit cards, monitoring checklist for meal pattern requirements)

Menu Record Activities



Activity One (10 minutes)

1. Add missing menu components to weekly menu
2. Determine which items will be homemade or commercially processed.

Center Daily Menu Record												
Month/Year	Aug-18				Center Name: ABC's Child Care							
Minimum Serving Size by Age Group					Monday	Tuesday	Wednesday	Thursday	Friday			
					Date: 6	7	8	9	10			
Breakfast					1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18
Planned/Prepared Served												
Milk	1/2 cup	3/4 cup	1 cup	1 cup	Whole and 1%	Whole and 1%	Whole and 1%	Whole and 1%	Whole and 1%			
Fruit/Vegetable	1/4 cup	1/2 cup	1/2 cup	1/2 cup	Peach Slices	Blueberries		Kiwi Slices				
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv					Oatmeal-WG			
M/M Alternate-optional	1/2 oz	1/2 oz	1 oz	1 oz								
Lunch					1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18
Planned/Prepared Served												
Milk	1/2 cup	3/4 cup	1 cup	1 cup	Whole and 1%	Whole and 1%	Whole and 1%	Whole and 1%	Whole and 1%			
Fruit	1/8 cup	1/4 cup	1/4 cup	1/4 cup	Cherries	Honeydew Cubes	Mandarin Oranges		Fruit Slices			
Vegetable	1/8 cup	1/4 cup	1/2 cup	1/2 cup			Cucumber Sticks		Broccoli			
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv	Chicken Nuggets				Toasted Cheese Sand.			
Meat/Meat Alternate	1 oz	1 1/2 oz	2 oz	2 oz								
Snack					1-2	3-5	6-12	13-18	1-2	3-5	6-12	13-18
Planned/Prepared Served												
Milk	1/2 cup	1/2 cup	1 cup	1 cup		Whole and 1%						
Fruit	1/2 cup	1/2 cup	3/4 cup	3/4 cup				100% Apple Juice				
Vegetable	1/2 cup	1/2 cup	3/4 cup	3/4 cup	Carrot Sticks	WG Soft Pita			Cherry Tomatoes			
Grains/Bread	1/2 serv	1/2 serv	1 serv	1 serv								
Meat/Meat Alternate	1/2 oz	1/2 oz	1 oz	1 oz	Peanut Butter				Water			
Water (if milk or juice is not component of snack-optional)					Water				Water			

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Each group has an activity packet and flip chart paper at your table. For this first activity you will use your Weekly Menu Record –yellow sheet- in your activity packet.

As a team complete the weekly menu by adding in the missing components. Make sure you add components that are homemade with a recipe. There are some standardized recipes in your activity packet you may choose from for the homemade menu items. Mark components as either Homemade (HM) or Commercially Processed (CP) depending on how you plan to purchase and prepare the menu items. The monitoring checklist for the updated menu pattern requirements is provided in your activity packet to verify the menus you create meet the meal pattern requirements.

Menu Record Activities



Activity Two: (15 minutes)

Let's go shopping

1. Select grain and meat/meat alternate product labels for *one day* on your weekly menu
2. Add weekly menu, one day menu and labels to flip chart

Center Daily Menu Record		Center Name: 401's Child Care				
Month/Year:	Aug 18	Monday	Tuesday	Wednesday	Thursday	Friday
Minimum Serving Size by Age Group	1-2	3-5	6-11	12-18	19-24	25-34
Breakfast						
Age Group	1-2	3-5	6-11	12-18	19-24	25-34
Planned/Prepared						
Service						
Milk	1/2 cup	3/4 cup	1 cup	1 cup	Whole and 1%	Whole and 1%
Fruit/Vegetable	1/4 cup	1/2 cup	1/2 cup	1/2 cup	Peach Slices	Blueberries
Grains/Bread	1/2 slice	1/2 slice	1 slice	1 slice		
Meat/Meat Alternate	1/2 cup	1/2 cup	1 cup	1 cup		
Lunch						
Age Group	1-2	3-5	6-11	12-18	19-24	25-34
Planned/Prepared						
Service						
Milk	1/2 cup	3/4 cup	1 cup	1 cup	Whole and 1%	Whole and 1%
Fruit	1/4 cup	1/2 cup	1/2 cup	1/2 cup	Cherries	Handy-dye Cubes
Vegetable	1/4 cup	1/2 cup	1/2 cup	1/2 cup	Mandarin Oranges	Cucumber Sticks
Grains/Bread	1/2 slice	1/2 slice	1 slice	1 slice		
Meat/Meat Alternate	1/2 cup	1/2 cup	1 cup	1 cup	Chicken Nuggets	Pepperoni Cheese Slice
Snack						
Age Group	1-2	3-5	6-11	12-18	19-24	25-34
Planned/Prepared						
Service						
Milk	1/2 cup	1/2 cup	1 cup	1 cup	Whole and 1%	Whole and 1%
Fruit	1/2 cup	1/2 cup	3/4 cup	3/4 cup		
Vegetable	1/2 cup	1/2 cup	3/4 cup	3/4 cup	Carrot Sticks	WG Soft Pita
Grains/Bread	1/2 slice	1/2 slice	1 slice	1 slice		
Meat/Meat Alternate	1/2 cup	1/2 cup	1 cup	1 cup		
Water (if milk or juice is not component of meal)					Water	Water

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For activity two you are going shopping! Remember to take your sugar limit cards from your activity packet.

There are two display boards with grain and meat/meat alternate foods as you would purchase at the grocery store or through a vendor. Select one day in your completed weekly menu and shop for the meat/meat alternates and grains you will need to prepare the breakfast, lunch and snack for that day. If you are using a recipe for the meat/meat alternate or grain component you will need to shop for the meat/meat alternate and grain products for the recipe as they are described in the ingredient list. Note: If the product is in the food buying guide the receipt or invoice from the store or vendor is all you need to verify the product. Grains, yogurts, commercially processed meat/meat alternates or combination foods are the products you need additional labeling or documents to determine if the product is creditable and serving size to meet meal pattern.

If you select a commercially processed item check out the "Manufacturer's" table for CN labels or PDF's. You will need these to credit the food items or components to the meal pattern. Once you are done shopping, attach your weekly menu to your flip chart. Complete the daily menu record in your activity packet for the day you selected and attach it to your flip chart. And finally add the labels you selected for the day menu to your flip chart.

Do: Post the presenters flip chart and add the presenters weekly menu, daily menu and food items to the flip chart.

Menu Record Activities



Activity Three: (15 minutes)

1. Using CN labels, PDF's, recipes, Exhibit A grain chart, sugar limit card, and nutrition fact ingredient labels to determine product creditability and serving sizes for your one day menu
2. Mark on your menu any grains that are whole grain-rich
3. Write how each food item/component credits (serving size per age group) on post it note and place on flip chart

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Now that you have the food items and labels, use the CN labels, PDF's, recipes, nutrition fact ingredient labels, sugar limit card and Exhibit A grain chart to determine to verify each product is creditable, which are whole grain-rich and the serving sizes for the grain and meat/meat alternate food items/components on your one day menu. If any recipe or commercially processed item also credits a vegetable or fruit to the meal pattern, determine if you can use them to meet the serving size for each age group.

Mark on your daily menu any grains that are whole grain-rich. If you change any food components after shopping make those revisions as well on the menu. Example, if you change recipes or switch from recipe to commercially processed or vice versa.

On post it notes write how each food item/component credits (serving size per age group) to the meal pattern and place post it notes next to each food label or recipe. As I have done on my example menu collage.

DO: Add post it notes to each food label or recipe.

Menu Record Activities



Activity Four:

- Present your menu and meal pattern crediting to the class

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Now that each of you have finished your menu collage lets have a few of you present your menu's, selected food labels and recipes and how you credited them to the meal pattern.

Do: Have at least 2-3 groups present if possible. If time allows review why some foods may not have been selected from the food labels.

Menu Record Activities



Best Practices for Maintaining Menu Records

- Using cycle menus
- Placing all menu records to support each cycle week in binder and protective sheets or in separate files
- Saving menu records in shared electronic files or on website
- Adding pictures of product packaging to menu records files



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The activities that you just completed with developing menus, collecting recipes and labels to credit each food item and component to the meal pattern the process each facility or Institution should be following to ensure each menu meets the meal pattern requirements. In the past year, after visiting several sponsors for the new meal pattern technical assistance visits or program reviews I have seen some great best practices.

Several if not the majority of sponsors are using cycle menus. This is the most effective tool when planning and implementing menus to meet the meal pattern requirements. Cycle menus save time and money and make food shopping and preparation more efficient.

I have seen a few sponsors who have placed each weekly cycle menu in a binder and protective sheets with all the labels and recipes for that week behind it. Each week in the cycle is set up in that same manner. Some sponsors have chosen to save all the menu records for the cycle menu in electronic format on an organization shared file server or on their website. One sponsor that has kitchen managers where English is their second language chose to take pictures of all the products they purchase and add them to a binder so they had a visual to ensure they purchased and received the correct product.

Overall it is important that each sponsor set up a record maintenance system for their menu records that are easy for their facility or facilities to use and access.

Tour of CNP Website



Home / Departments / Child Nutrition Programs

Child Nutrition Programs



 Idaho Child Nutrition Programs provide education, leadership, technical assistance, training, resources, oversight, and guidance on policies and regulations to ensure the nutritional well-being of all Idaho citizens. We are a professional team guided by the principles of public service, accountability, efficiency, and leadership to child and adult nutrition programs in Idaho.

These programs provide cash assistance and commodity foods to ensure children are adequately fed in public, private, and charter schools; residential child care institutions; preschools; and child and adult care centers and homes. The meals provided are guided by the U.S. Dietary Guidelines for Americans.

This institution is an equal opportunity provider.

HIGHLIGHTS

-  RESOURCE CENTER
-  CIVIL RIGHTS

Child Nutrition Programs »

- > Child and Adult Care Food Program
- > Healthy Nutrition Environment
- > School Meal Programs
- > Summer Food Service Program
- > USDA Foods & Processing

Archives »

Resource Center »

Contact Details

- ▲ Main Line
- ☎ (208) 332-6820
- 📁 CNP Playlist
- 👤 Staff »

<http://www.sde.idaho.gov/cnp>

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Finally lets do a quick review of the Child Nutrition website. Here is where you can access the child nutrition website for Idaho.

DO: Open website on computer and go through site.

Wrap up and Questions?



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khuntley@sde.idaho.gov
www.sde.idaho.gov/cnp/cacfp



Supporting Schools and Students to Achieve

SHERRI YBARRA, ED.S., SUPERINTENDENT OF PUBLIC INSTRUCTION

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We have covered a lot of information today. Are there any questions?

Your evaluation form is in your training packet, please complete and leave on the registration table.

Thank you for attending the training!

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- (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.

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