

CACFP Corrective Action and Corrective Action Plans (CAP's)

CACFP Annual Training 2019



- Explain the purpose of corrective action
- Analyze the root cause of noncompliance resulting in corrective action
- Understand the relationship between corrective action and the corrective action plan (CAP)
- Identify the components of a CAP
- Evaluate the effectiveness of a CAP
- Share best practices for sponsoring organizations

Corrective
Action &
Corrective
Action Plans
(CAP's)
Learning
Outcomes



**Program
Noncompliance**

Finding

**Corrective
Action**

What is Corrective Action?



A corrective action is the action the facility will take within a specific time frame to address the finding(s) of noncompliance and to prevent it from recurring.

2 CFR 200.26

Corrective Action is:

- New or improved processes or procedures
- Implemented within a specific time frame
- Expected to resolve the condition that resulted in noncompliance
- Expected to prevent recurrence
- Identifies who is responsible for implementing and maintaining the new processes or procedures



Identifying the Root Cause of Noncompliance:

The 5 *Why's* Method



Why?



Why?



Why?



Why?



Why?

Let's put the 5 *Why's* Method to the test...



**Finding: Failure to maintain compliance with 7 CFR
226.20(c) Meal Pattern Requirements**

Required Action:

Meet the meal pattern requirements=

**Only serve and claim meals containing
creditable items!**

Why?



Why?



Why?

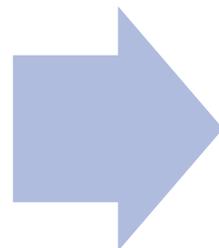


Why?



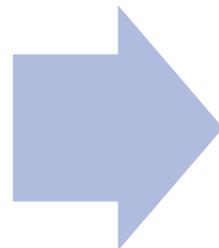
Why?

WHY was the meal not reimbursable?



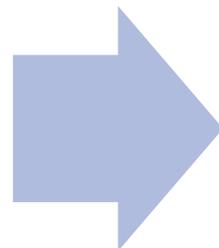
Because the meal did not meet meal pattern requirements

WHY did the meal not meet requirements?



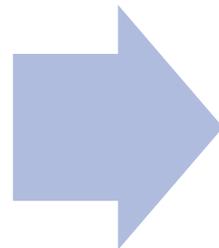
Because the cook served the orange drink

WHY did the cook serve the orange drink?



There was no 100% OJ and he wanted to serve something as close as possible to the posted menu

WHY did the cook think it was OK to serve the orange drink?



Because it appeared to be similar to OJ and apples/apple juice was not listed on the posted menu



What is the root cause of the meal pattern noncompliance?

Lack of Training!

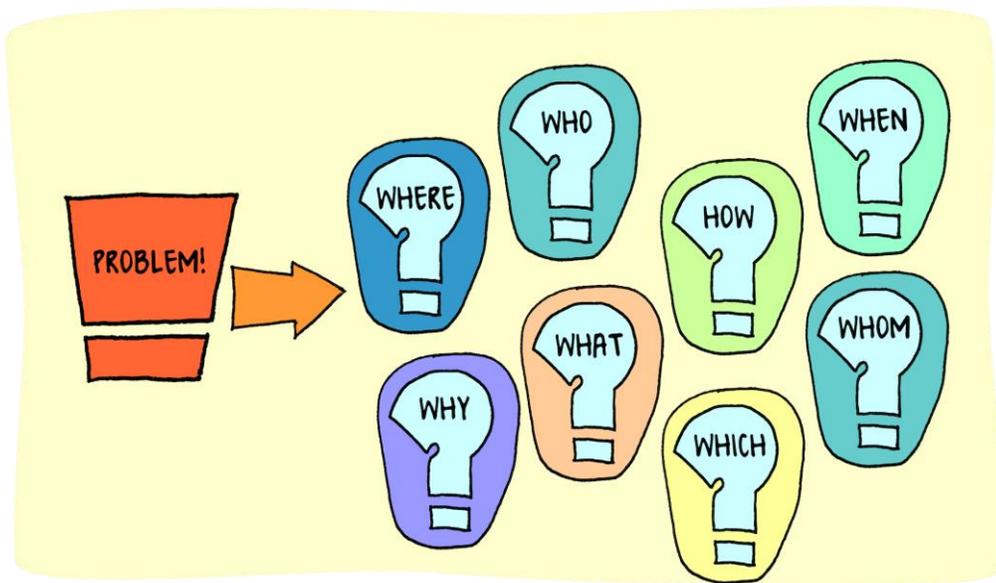
Now What???

1. ID
Noncompliance
=Need for
Corrective
Action

2. Root Cause=
Lack of Training

3. Written
Corrective
Action
PLAN

Corrective Action Plans (CAP's)



A Corrective Action Plan (CAP) is a written response that details the specific action the facility will take within a specified time frame to permanently correct the noncompliance

2 CFR 200.511(c)

Purpose of Corrective Action Plans:

- To document the actions that a sponsored home or center will take to fully correct the problems
 - To demonstrate a full understanding of the program regulations and policies
 - Accountability
 - Staff turnover

Corrective Action Plans must be:

SPECIFIC

Detailed, step by step actions

MEASURABLE

Does this plan solve the problem?

ATTAINABLE

Do staff have the needed skill-set & training?

REALISTIC

Do you have enough resources to make this happen?

TIMELY

When will it happen? How often?

Developing Corrective Action Plans

WHAT

WHAT new processes/procedures will be implemented to correct the finding?

WHO

WHO will ultimately be responsible for implementing the procedures and internal controls?

HOW

HOW will the facility ensure that the procedures are followed consistently to prevent recurrence? How will staff be notified and/or trained?

WHEN

WHEN will the new procedures be implemented and how often?

WHERE

WHERE will the CAP be kept and who will have access to the documentation?

Supporting Documentation

- Income Eligibility Forms
- Attendance Records
- Meal count forms
- Child Nutrition (CN) Label or Product Formulation Statement
- Menus
- Training documentation



- The State Agency will give you a due date for any Corrective Action Plan required for Administrative Review findings.
- If you request a 1-in-3 Year Exception for a late claim, the CAP must be accepted prior to the late claim submission.
- Sponsoring organizations of unaffiliated centers must also provide due dates for required Corrective Action Plans
- The recommended deadline for corrective action implementation: **15 days or less***

Corrective Action Plan Due Dates

***depending on the nature of the noncompliance and CAP required**

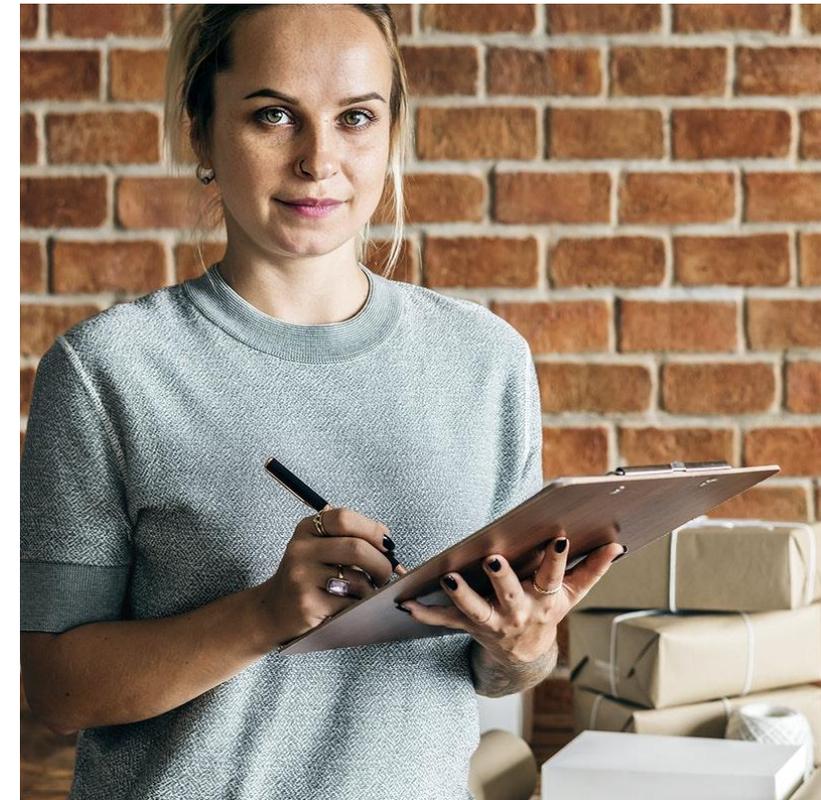
Evaluating a Corrective Action Plan

- Determine whether documented plan includes all of the required elements
- Assess whether noncompliance is sufficiently addressed
- Determine whether noncompliance is likely to recur
- Assess whether corrective action has been fully implemented

Corrective Action Scenario: ABCD Daycare Center



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ABCD Child Care, a sponsored (unaffiliated) child care center, had a monitoring visit. They submitted menus to their monitor for review. The following meals were served per the menus:

- Lunch on 9/14/18: Baked chicken, brown rice, green beans, apple slices, milk
- Lunch on 9/6/18: Pork chops, French fries, whole wheat roll, oranges, milk

When the monitor looks in the walk-in refrigerator, she sees that the only milk in the center is 2% milk

Corrective Action Plan Scenario

Corrective Action Plan Scenario (continued)



The monitor asks why the center is serving 2% milk. The brand new Substitute Cook says that the Lead Cook has been out for the last 2 weeks due to a sudden family emergency. While she's been out, the Center Director has been placing the food orders.

The Sub says "I don't know anything about the milk- I was working here as an office assistant and was just promoted to this position when the Lead Cook left. They gave me this cycle menu to follow and I just used what was in the walk-in".

When the monitor talks to the Center Director about it, she says “It’s been a crazy couple of weeks! We had teachers out with the flu and then the cook had to leave unexpectedly for a family emergency! We didn’t have anyone to cook so we promoted my office assistant to the cook position the next day! It was great that she could take over the cooking without any training because I only handle the paperwork side of the program and I’ve been right out straight! To help her out, I have been ordering the food. I knew that the milk had to be low fat, or something, so I just ordered the 2%. With everything I’ve had going on, that’s OK right?”



Corrective Action Plan Scenario (continued)

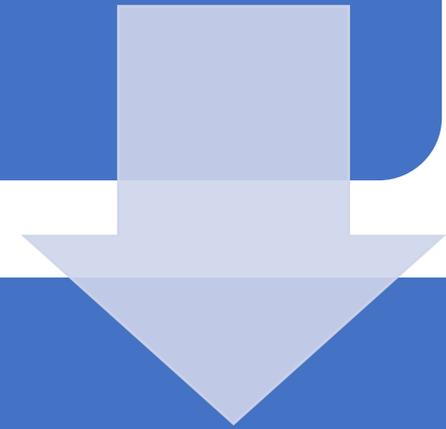
Program Noncompliance= Failure to meet meal pattern requirements

As a result, lunches were disallowed and could not be claimed for reimbursement.

Finding= Failure to maintain compliance with 7 CFR 226.20(c) Meal Pattern Requirements

Required Corrective

Action: The sponsored facility (center) must ensure compliance with 7 CFR 226.20(c) Meal Pattern Requirements



Corrective Action Plan

Determine the Cause of the Noncompliance

Why did ABCD Child Care not meet the meal pattern?

Because they served 2% milk.

Why did they serve 2% milk?

Because the cook left unexpectedly for a family emergency and no one else knew what kind of milk to serve.

Why did no one else know what kind of milk to serve?

Because no other staff were trained on CACFP meal pattern requirements.

1. Lack of training for new staff

2. Lack of trained back-up staff

3. Lack of communication with the sponsor

Root Cause(s)

Writing a Corrective Action Plan

WHAT

WHAT new processes/procedures will be implemented to correct the finding?

- New staff will be trained on Civil Rights and relevant CACFP topics before assuming CACFP responsibilities
- 2 staff members will be trained on all CACFP responsibilities
- Any changes in staff will be reported to the sponsor within 24 hours.

Writing a Corrective Action Plan



WHO will ultimately be responsible for implementing the procedures and internal controls?

- **Nutrition Coordinator** will train new kitchen staff on Civil Rights and relevant topics before assuming CACFP responsibilities.
- **Center Director** will ID additional staff members to be trained as back-ups in case of emergencies. Those staff members will be trained on relevant topics by the **Center Director** or **Nutrition Coordinator**, depending on the nature of their duties.
- **Center Director** or **Human Resources** will notify the Sponsor of any staff changes within 24 hours.

Writing a Corrective Action Plan

HOW

HOW will the facility ensure that the procedures are followed consistently to prevent recurrence? How will staff be notified and/or trained?

- Add CACFP training to HR's New Hire Checklist for new CACFP staff.
- Human Resources will monitor checklists and ensure they have received documentation of training (date, location, topics, trainer initials and new staff signature) prior to new staff starting CACFP duties.
- This process was added to the institution's Policy and Procedure Manual and discussed at the facility staff meeting on 10/8/18.

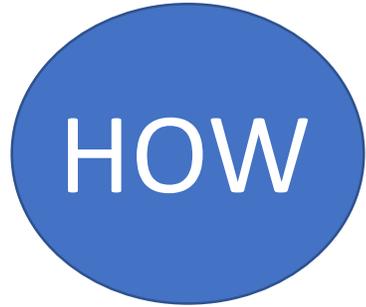
Writing a Corrective Action Plan

HOW

HOW will the facility ensure that the procedures are followed consistently to prevent recurrence? How will staff be notified and/or trained?

- Back-up staff will be trained by either the Nutrition Coordinator or Center Director on relevant CACFP topics.
- Trainings will be documented with the location, date, topics and signatures of the trainers and trainees; training documentation will be kept in staff files and tracked by Human Resources.
- Human Resources will add back-up staff to future annual In-House CACFP Training schedules.
- The new procedure was discussed at the staff meeting on 10/8/18.

Writing a Corrective Action Plan



HOW will the facility ensure that the procedures are followed consistently to prevent recurrence? How will staff be notified and/or trained?

- A policy was added to the institution's Policy and Procedure Manual describing the Center's process for notifying the sponsor of changes in staffing within 24 hrs. The new policy was discussed at the staff meeting on 10/8/18.

Writing a Corrective Action Plan



WHEN will the new procedures be implemented and how often?

- The training policy for new staff is effective immediately and will apply to all new CACFP staff going forward.
- Back up staff will be identified by 10/10/18 and will be trained in new duties at an upcoming training scheduled for 10/25/18. After the October 25th training, back up staff will receive annual in-house training on all relevant CACFP topics.
- The policy for notifying the sponsor of staff changes is effective immediately.

Writing a Corrective Action Plan

WHERE

WHERE will the CAP be kept and who will have access to the documentation?

- The plan of correction will be kept in a locked file cabinet in the Center Director's office. The Center Director, Nutrition Coordinator and Human Resources staff have access to the CAP.

Is the CAP Acceptable as Written?

ACTIVITY: CAP ANALYSIS

Sample Corrective Action Plan (CAP) Evaluation Checklist

Suggested Criteria for Evaluating an Acceptable CAP Response	Check One			Comments
	Yes	No	N/A	
1. Does the CAP provide a detailed explanation of what actions and series of steps (procedures) were taken or outlined to correct the Program violation(s)?				
2. Is the CAP specific, measurable, attainable, realistic, and timely?				
3. Does the CAP list the problem(s) that were addressed in the letter or monitoring report and address the root cause of the problem (why did it happen)?				
4. Does the CAP describe how to implement the actions and the series of steps for correcting the Program violation(s)?				
5. Was a detailed process provided to correct the Program violation(s) and explain how the process will be followed consistently to prevent future operational weaknesses?				
6. Does the CAP identify a single person/position who is responsible for making sure corrective action is taken?				
7. Does the CAP identify the person (and his or her position) who is responsible for verifying that the CAP is effective?				
8. Does the CAP identify when the procedures for addressing the Program violation(s) will begin and how often the procedure will be completed (time frames)?				
9. Does the CAP identify where the information will be maintained?				

Is the CAP Acceptable as Written?

If you
answer
“NO” to
any
questions



The CAP
CANNOT
be
accepted
as written



Request
additional
clarifying
information



The CAP
must be
complete
and
correct by
the
deadline!

Monitoring a CAP

As sponsoring organizations, you need to verify that the accepted CAP is being implemented at your sponsored Home or Center.

1. Accept
the CAP

2. Verify
Implementation

3.
Conduct
Follow
Up Visits

- Provide ongoing training on CACFP policies and procedures
- Develop a facility-specific training program to address noncompliance
- Monitor facilities on a quarterly basis
- Establish and document policies for responding to corrective action and for writing CAP's
- Conduct follow-up visits to review CAP implementation and compliance

Organizational Best Practices

RE-CAP

- Definition and purpose of Corrective Action
- Root-cause analysis
- Corrective Action Plan requirements
- Components of a CAP and evaluating effectiveness
- Best Practices

Questions



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