Family Day Care Home Workshop 2019-2020

Family Day Care Home Workshop

Presented by:

Oklahoma State Department Of Education
Child Nutrition Programs

Edgar Saravia-Rodas, FDCH Coordinator
Kassi Reddell, Project Coordinator
Family Day Care Home Workshop

• Manual
• Handouts
• Housekeeping
  - Location of Restrooms
  - Cell Phones

Family Day Care Home Workshop

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• List of Child Nutrition and Related Acronyms
• Consultant Territories
Basic Responsibilities

Basic Responsibilities Outline

• Prior to Beginning
• After Beginning Operation
• Application and Agreements
• SO Financial Requirements and Records
• Other Required Documents
• SO Policies
• Civil Rights
• Provider Record Keeping

Prior to Beginning

- New sponsors must prove a need to provide benefits to unserved children.
- Complete and submit an application online
- Complete a yearly administrative budget
- Comply with the Civil Rights Act of 1964
- Have tax exempt status under the IRS Code 501(c) (3)
Basic Responsibilities

Prior to Beginning (continued)
- Develop SO policies
- When not using SDE forms, ensure all required information is included on the form
- Develop outreach materials and instructional materials for the providers
- Provide training to the FDCHs in the CACFP programs prior to participation
- Provide financial viability, administrative capability, and program accountability
- Have a DUNS# and expiration date

LICENSE/PERMIT REQUIREMENT!

- Sponsoring Organizations must submit a copy of each provider’s license/permit to the SDE. Each license received must include the SO’s agreement number and the provider number.
Resource Library

• Found in the CACFP website (see gold stripe on left side)

• FDCH Forms and Documents

• FDCH Training Manual

Provider Number

• Must be 4 digits

• Example: Jane Smith #0031

• Incorrect: #31, #031
Provider DL/ID

• **Color** copy of provider’s DL/ID must be on file

Provider DL/ID

• **Black and White** copy is **NOT** acceptable
Provider Add Form

Agreement #: ____________________________
Sponsor Name: __________________________
Provider Site #: _________________________
Provider #: ______________________________
License/ Permit Number: ____________________

(Please check one) Payroll  Permanent License

If provider is on a 6-month permit, please supply the information below:

Permit effective date: ______________________
Permit expiration date: _____________________

License Capacity: _________________________
Type of License: [Please check one] DHS  Tribal  Military

Address: __________________________________

Phone Number: ___________________________
Birthday: _________________________________

Last 4 digits of SSN: ______________________

If approved, visit site:

Last Operating Day Report:
New providers must be reviewed at least once during the first four weeks of Program operation.

Driver's License/ID Card on file? Yes  No

May 2019

Provider Drop Form

Agreement #: ____________________________
Sponsor Name: __________________________
Provider Name: __________________________
License Number: _________________________
Birthday: ________________________________
Last Claim Month: _________________________

Last Operating Day Report:
End Operating Date (Ex. 12/31/18) must fall within Last Claim Month (Ex. March)

Reason for Drop: __________________________

May 2019
Basic Responsibilities

✓ After Beginning Operation

1. Institutions participating must cooperate with USDA in conducting evaluations and research
2. Maintain itemized receipts, invoices and payroll costs. RECORDS MUST BE AVAILABLE FOR REVIEW AND AUDIT
3. Maintain all records pertaining to the program for 3 years following end of the fiscal year or until a pending review or audit is resolved
4. Conduct preapproval visits prior to participation
5. Utilize most current data available in making Tier 1 determinations (School Data, Census, Household Income)
6. Change determination when information is available and indicates Tier 1 status has changed

Basic Responsibilities

✓ After Beginning Operation (continued)

7. Notify FDCHs qualifying as Tier II homes of their reimbursement options
8. Be responsible for collecting FSIs for Tier II homes
9. Obtain an FSIA on each Tier 1 provider who keeps his or her own children and wishes to claim their meals
10. Monitor all homes
11. Conduct annual training
12. Enter into a written application and agreement with each FDCH participating that specifies rights and responsibilities for BOTH parties
Basic Responsibilities

✓ Application and Agreements
  1. Sponsor Application/Budget/Management Plan and Agreement
  2. Provider Application/Agreement
  3. Provider Tiering Determinations
     - School Data
     - Census Data
     - Family Size and Income Applications

Basic Responsibilities

4. Sponsor/Key Staff Training
5. Provider Training
6. Preapproval Visit Form
7. Monitoring
SO Financial Requirement Records

- Financial Viability
- Administrative Capability
- Program Accountability

SO Financial Requirement Records

- Monthly Personnel Record Worksheet
- Expenditure Worksheet
- Edit Checks
- Participating Providers/Claim Documents
- Claim for Reimbursement
- Payment Notice
- Payment Voucher/Disbursement Record
Other Required Records

• Building for the Future

• WIC

• Annual organization wide audit

Sponsoring Organization Policies

• Develop policies to support your procedures

• Providers must receive a copy annually

• No restriction on the days of SO’s days of operation if approved by the State Agency
Additional Requirements

- Civil Rights Compliance
- Provider Record Keeping
  - Enrollment Form
  - Daily Arrival & Departure Record
  - Daily Record of Meal Served
  - Weekly Meals Served
  - Infant Meals Served
  - Cycle Menu (Optional)
  - CN Labels/Product Formulation Statements
  - Monthly/Daily Records
  - Recruitment

Recruitment - NO

- A sponsor CANNOT use its own money for rewards for its providers who bring on new providers. While the sponsor may not be using CACFP funds, there is still a conflict of interest issue. The sponsor cannot solicit providers to conduct outreach business for the benefit of the sponsor.
Sponsoring Organization Policies and Procedures

Checklist for SO Policies/Procedures

- Personnel Policies
- Provider Policies
Personnel Policies

1. Hiring Procedures
2. Types of Positions-Organizational Chart
3. Office Schedule, Notification, Pay Periods, Holidays
4. Leave of Absence
5. Compensation Policy
6. Termination
7. Restricting Outside Employment Policies
8. Sponsoring Organizational Key Staff Training

Provider Policies

1. Recruitment of Providers Policies
2. Unavailable Providers
3. Meal Disallowances
4. Mealtime Change
5. Cycle Menus, if applicable
6. Submission of Records
7. Provider Edit Checks
8. Annual Provider Training
9. Serious Deficiency Procedures
10. Proposed Termination/ Proposed Disqualification
11. Appeal Procedures
12. Suspension/ Termination
Sponsoring Organization Staffing

Determining Staffing Needs

- Recommended CACFP Staff Positions
- Recommended Staffing Patterns
- Examples:
  - Executive Director
  - Coordinator
  - Home Monitor
  - Secretary/Receptionist
  - Financial Officer/Accountant
Civil Rights

Non-Discrimination Statement

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.
Non-Discrimination Statement

This institution is an equal opportunity provider.

Civil Rights

• Public Information Responsibilities
• Civil Rights Nondiscrimination Statement
  • (Must be on all information sent to the public)
• Data Collection
• Civil Rights Complaints
• Procedure for Filing Complaints of Discrimination
• Civil Rights Complaint Form-pages
Procurement/Financial Recordkeeping

Procurement Procedures & Practices

• Procurement includes the act of obtaining or buying goods & services.
• The primary purpose of procurement is to assure that open and free competition exists to the maximum extent possible.
• Procurement procedures must not restrict or eliminate competition.
Methods of Procurement

• INFORMAL METHODS
  – Micro-purchase
  – Small purchase procedures

• FORMAL METHODS
  – Sealed bids
  – Competitive Proposals
  – Noncompetitive Proposals

Micro-Purchase

• Aggregate/total transaction does not exceed $3,500 – $10,000
• Distributed among qualified suppliers
• No quotes required
• Price must be reasonable
• Document why you purchased from a certain supplier?
Small Purchase Procedures

- Purchases are over $10,000, but under $150,000 per bid or solicitation document
- Obtain quotes (may be email, telephone, oral, catalogs, websites)
- Documented
- Contact at least two sources

Competitive Sealed Bids/ Invitation For Bid (IFB)

- Bids are publicly solicited from at least 2 vendors with sufficient time to respond
- Firm, fixed-price contract awarded to lowest responsible bidder, if meeting all terms of the contract
- Documents include a complete, adequate, and realistic specification/description
- Public bid opening
- Bids may be rejected for sound documented reason
Competitive Proposal/Request For Proposal (RFP)

- Contract Award
- Request for Proposal is publicized identifying all evaluation factors
- Adequate number of sources
- Written method of conducting evaluations
- Awarded to the firm whose proposal is most advantageous with price and other factors considered
  - Sealed bids are not appropriate

Noncompetitive Proposals

- No other form of procurement is feasible
- Item available from one source
- Emergency circumstances
- Competition is inadequate
Product Specification

**Definition** – A clear and accurate description of the goods or services that an institution is procuring or wants to purchase

Specifications Should:

- Be simple but precise
- Be clear and understandable
- Use terms identifiable in the market place
- Be capable of being met by several bidders
- Should NOT be written by the vendor
Solicitation Letter
Documentation of Goods & Services

• Letterhead
• Date of letter
• Specifications attached
• Method of response
• Deadline for bid
• Substitutions and shortages
• Termination for cause
• Special conditions

Procurement Plan/Procedures

• Must Include:
  ▪ Method of Procurement
  ▪ Code of Conduct
  ▪ Protest Procedures
  ▪ Nonkickback Affidavit
  ▪ Lobbying Certification
  ▪ Debarment or Suspension
  ▪ Effort to utilize:
    ▪ Small businesses, minority-owned firms, and women’s business enterprises
  ▪ Chart of Procedures
  ▪ Geographic Preference
NOT Allowable Procurement Practices

- Potential contractor writing bid proposal or product specifications.
- Potential contractor evaluating bid/proposals submitted by competitors.
- Negotiating sealed bid awards.
- Potential contractor having access to sealed bid information prior to opening.
- Purchases without following procurement procedures.

Sponsoring Organization Budget

✓ General Budgeting Requirements

Costs must be:

- Allowable
  - Necessary
    - Reasonable
Sponsoring Organization Budget

- Direct Costs
  - CACFP employee salaries who work solely for the CACFP
  - Cost of materials used specifically for the operation of the CACFP
  - Travel expenses incurred specifically to carry out the objectives of the CACFP
- Indirect Costs (Apply an indirect cost rate)
  - Costs incurred for more than one program (CACFP & non-CACFP activities)
  - Example: Water and Utilities

Sponsoring Organization Budget

- Examples of Shared/Allocable Costs
  - Depreciation and use allowances on building and equipment used for common purposes
  - Cost of operating and maintaining facilities, equipment, or grounds
  - Salaries for an office receptionist and central accounting staff
  - Payroll Services
- Written Prior Approval of Costs
Unallowable Costs

- Not reasonable
- Not necessary
- Not approved on the budget
- Not properly allocated between CACFP & non-CACFP programs
- Less-than-arms-length transactions
- Alcoholic beverages
- Lobbying
- Contracting with SO employees, officers or board members
- Recruitment incentive payments
- Paying bad debts

Unallowable Practices

- Purchases made for individuals through the CACFP account
- CACFP vendor services billed to an individual instead of the SO
- Personal credit card or checks for CACFP purchases
Labor Costs

• Documentation:
  – Salary – Must not exceed the approved labor for that employee on budget
  – Number of hours worked each day
    • Time In/Time Out Sheets
    • Starting and ending times
    • Absences

OLD Form
Budget Amendments

- Submit Justification Letter
- The Appropriate Schedule
- Budget Summary Pages
- Amendments are only effective the first of the month in which the amendment is received
Budget Justification Form

Guidance for Management Plans and Budgets
A Child & Adult Care Food Program Handbook
December 2013
✓ Monthly Personnel Record Worksheet

Expenditure Worksheet
**CACFP Home Sponsor Program-Claim Summary**

**Claim Documentation-Meal Counts By Provider**

- Tier Status
- Provider Number
- Name of Provider
- Number of Meals
- Enrollment
- ADA
- Number of Days
Sponsoring Organization
Financial Record Keeping

• Payment Notice

• Payment Voucher/Disbursement Record

• Steps for Claim Revision
Provider Application and Agreement

• Provider Application
• Permanent Agreement Between Sponsoring Organization and FDCH Provider
• Brief Overview of Meal Patterns
• Civil Rights Data Collection
• Tiering
• Record Keeping
• Certification Statements and Signatures
• Provider List of Serious Deficiencies
• Provider Appeal Procedures
Tiering Determinations

Tier 1

**AREA ELIGIBILITY**
- School Data – School attendance area 50% Free & Reduced
- Census Data (frac.org) - At least 50% of children in a geographic area meet poverty guidelines
Tiering Determination

Tier 1

INCOME ELIGIBILITY OF PROVIDER
- Family-size and Income Application
  - Income
  - Categorical
    - SNAP
    - TANF
    - FDPIR

TIER I HOMES BY SNAP

- Due by March 15 of each year.
TIER I (PROVIDER) FSIA
CATEGORICAL ELIGIBILITY APPROVAL

► Provider's name and number
► Name of all household members
► Case number (must be Oklahoma number):
  ▶ SNAP = A, B, C, D, H, J, or T + 6 to 9 digits
  ▶ TANF = C or H + 6 to 9 digits
  ▶ FDPIR = ???
► Signature of adult household member
► Verify with written documentation that the information is accurate

TIER I (PROVIDER) FSIA
INCOME-ELIGIBILITY APPROVAL

► Provider Name and number
► Names of all household members
  ▪ If household member has no income, check box
► Names of household members with income:
  ▪ Amount of income
  ▪ Must be **GROSS (before taxes)**
  ▪ Income received and how often
► Signature of adult household member
► **Last 4 digits** of social security number or check the box indicating there is none
► Verify the information is accurate – pages 140-142
FOSTER CHILD  
CATEGORICALLY ELIGIBLE
► Foster children are categorically eligible.
► Include name of foster child included with other children in the household.
► ‘X’ the box to indicate ‘foster.”
► Only child’s personal income is included on FSIA, not foster payments.
► An adult household member must sign.
► Automatic eligibility of foster child **DOES NOT** mean automatic eligibility for other children in household.

INCOME CONVERSION

ANNUAL:
► Weekly x 52
► Every 2 weeks x 26
► Twice/Month x 24
► Monthly x 12
FSIA APPROVAL

► Incomplete applications **MUST NOT** be approved.
► Incomplete applications must be “denied.”
► If required information is missing, non-readable, questionable, or inconsistent:
  ► Contact household
  ► Document conversation
  ► Return FSIA if signature is missing
  ► Must resolve inconsistencies before approving
► FSIA must be approved at face value.

FSIA APPROVAL

Each FSIA must contain approval signature of institution representative and date the form was approved to be valid.
EFFECTIVE DATE OF FSIA

Flexibility of effective date

- Date the parent signs the FSIA

- Date the institution official signs the FSIA

Verification of Eligibility
For Tier I Status Based on Provider

- Requirements for Income Verification
- Requirements for Categorical Verification
- Processing Verification Records
- Notification of Status as a Result of Verification
Tiering Determination/Verification

Tier 1
- Verification
  - Worksheet
  - Pay Stubs
  - Tax Return
  - Letter from employers
  - Verification of Government benefits
  - Documentation from SNAP, TANF, OR FDPIR
  - Child Support or Alimony

Provider Verification Results

- Provider must be notified of their reimbursement status as a result of verification.
- Sponsors must also notify the providers, in writing, any time there is a change in their tiering status.
Foreign Language Translations

Institutions must make reasonable effort to send appropriate non-English language household letters or notices and application forms

https://www.fns.usda.gov/school-meals/translated-applications

Provider’s Own Children

Requirements to Claim:
• Must be enrolled and participating during the time of the meal service
• Other enrolled children must be present and participating
• Family-size and Income Application on file showing provider’s eligibility
Tier II Determinations

✓ Tier II
  • Not Area Eligible
  • Not Eligible through FSIA of provider

✓ Meals Could Be Claimed as Tier I through:
  • FSIA on children’s household
    • Income Eligible
    • Categorically Eligible
    • Expanded Categorically Eligible

Distribution and Return of FSIA

• Distribution of FSIA
  – Provider’s Option
    • SO
    • Provider

• Collection of FSIA
  – Provider collects and gives to the SO
  – Household submits FSIA directly to the SO

• Confidentiality
Required Training

✓ Sponsoring Organization Key Staff Training

1. CACFP Meal Pattern
2. Reimbursement Process
3. Accurate Meal Counts
4. Claims Submission & Claim Review Procedures
5. Recordkeeping
6. Civil Rights
Required Training

✓ Provider Training
  1. CACFP Meal Pattern
  2. Reimbursement Process
  3. Accurate Meal Counts
  4. Claims Submission & Claim Review Procedures
  5. Recordkeeping
  6. Civil Rights

Provider Record Keeping
Provider Required Record Keeping

✓ Record-Keeping Forms and Instructions

• CACFP Enrollment Form
• Daily Arrival And Departure Record
• Daily Record of Meals Served
• Weekly Meals Served
• Record of Donated Product
• Building for the Future
• Women, Infants, and Children Program (WIC) Information

Provider Monitoring

✓ Preapproval Visit Form
✓ On-Site Monitor Review
  • 1 announced & 2 unannounced
  • Review averaging
✓ Licensing Requirements for Small and Large Family Day Care Homes
✓ Household Contact Documentation
Monitor Staffing Ratio

Timing of Reviews

- The timing of unannounced reviews must be varied and they may not follow a consistent, predictable pattern. For example, unannounced reviews for a particular home would not be varied and unpredictable if the provider knows that the monitor always comes during the third week of January, the third week of May, and the third week of September, or never comes during the first week of the month because the sponsor staff are busy processing claims. You are less likely to uncover problems and issues if providers can guess when their unannounced reviews are likely to occur [CACFP 16-2011, Varied Timing of Unannounced Reviews in the Child and Adult Care Food Program, April 7, 2011].
Operating on Weekends, Evenings, Holidays

- If an FDCH provider serves meals on weekends, evening snacks, suppers, and/or holidays, the sponsor is required to monitor meals during those meal times.

- Sponsors that have limitations to the extent to which they can meet Program oversight requirements should not accept facilities that exceed their management capabilities [CACFP 04-2006, Sponsor Monitoring of Facilities in the Child and Adult Care Food Program (CACFP), May, 23, 2006].

Household Contact System

- Send form to every household enrolled at the home.
- Sponsor enters the SO information, provider name and number and a phone number.
- Household completes the rest and sends back to the SO in the envelope provided by the SO.
- Two negative responses require further action – Declare the provider Seriously Deficient.
Seriously Deficient (SD) Procedures

Important Notice

Seriously Deficient/SD

- CACFP regulations define seriously deficient as the status of an institution or a day care home that has been determined to be non-compliant in ONE or MORE aspects in its operation of the Programs.
Termination for Cause

- The sponsoring organization must **initiate** action to terminate the agreement of a day care home for cause if the sponsoring organization determines the day care home has committed **one** or **more** serious deficiencies.

Serious Deficiencies

- Submission of false information on the application
- Submission of false claims
- Simultaneous participation under more than one SO
- Noncompliance with meal patterns
- Failure to keep records
- 25% Error Rate
- Conduct or conditions that threaten the health or safety of children
- Conviction indicating a lack of business integrity
- Failure to participate in training
- Any other circumstance related to nonperformance
6 Steps in SD Process

1. Identify the serious deficiencies
2. Issue a notice of serious deficiency with 10 calendar days
3. Receive and assess the institution’s written Corrective Action Plan/CAP
4. Issue a notice of temporary deferral of the SD within 10 calendar days if CAP is approved, or issue a notice of proposed termination and disqualification, including appeal procedures, if CAP inadequate (or if no CAP is received)

6 Steps in SD Process (cont’d)

5. Provide an appeal review/hearing, if requested, of the proposed termination and disqualification
6. Issue a notice of final termination and disqualification within 10 calendar days if the appeal is upheld OR if the timeframe for requesting an appeal has passed, OR issue a notice of temporary deferral within 10 calendar days if the appeal is overturned
Imminent Threat

• If serious deficiency constitutes an imminent threat to the health or safety of participants, or the day care home has engaged in activities that threaten public health or safety, the SO must follow the procedures for the suspension process.

Notice of Serious Deficiency

• Must include:
  – The serious deficiencies, **including citations from CACFP regs**
  – The actions to be taken by the day care home to correct the serious deficiencies
  – The time to correct the serious deficiencies, not more than 30 days
  – That the serious deficiency determination is no subject to appeal
  – That failure to fully and permanently correct the SD with the allotted time will result in proposed termination and proposed disqualification
  – That voluntary termination of day care home’s agreement with the SO will still result in formal termination/Put on NDL