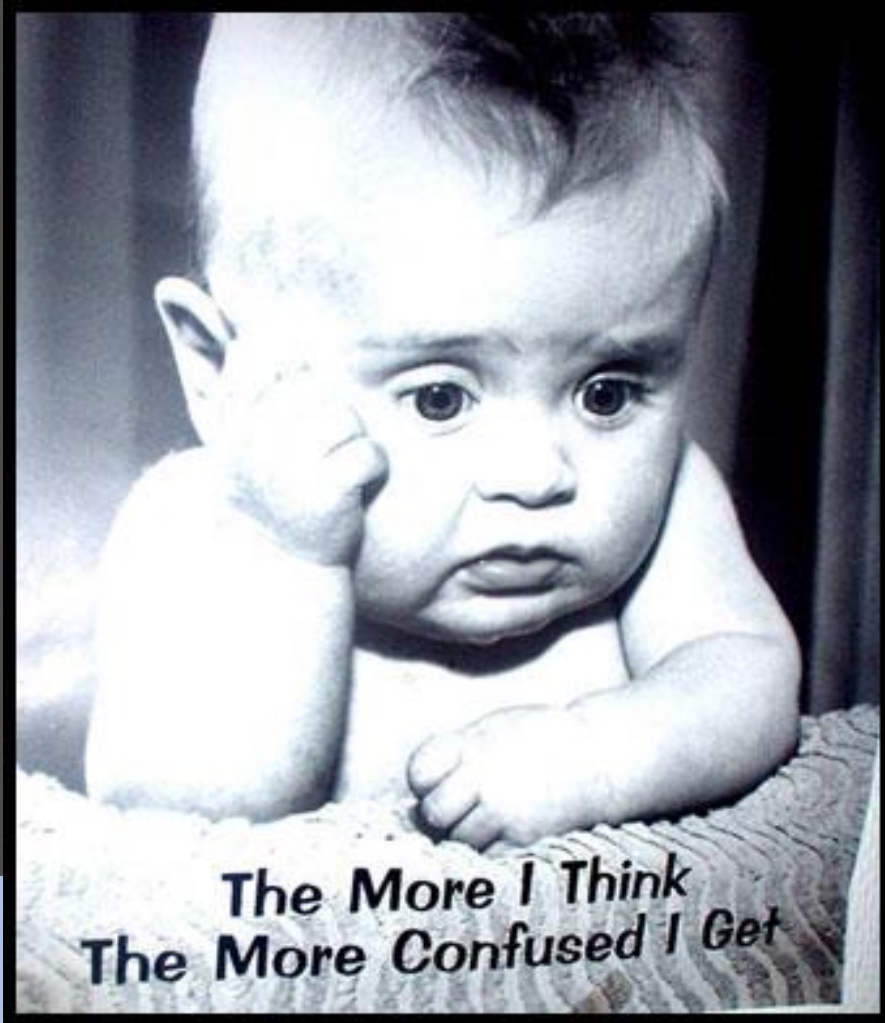


Management Plans

CACFP Annual Training 2019



**Who here has struggled
with developing and
completing a
management plan?**



Learning Outcomes

- Explain the definition of management plans
- Discuss CACFP performance standards
- Explain the purpose of management plans
- Discuss the components of management plans
- Discuss how to evaluate, monitor, revise, and submit management plans
- Discuss management plan best practices

Management Plans- Required!

Federal Regulations

CACFP Institutions

New:

7 CFR 226.6(b)(1)(iv)

Renewing:

7 CFR 226.6(b)(2)(i)



What is a Management Plan?



- A CACFP institution's written practices and procedures for CACFP operations.

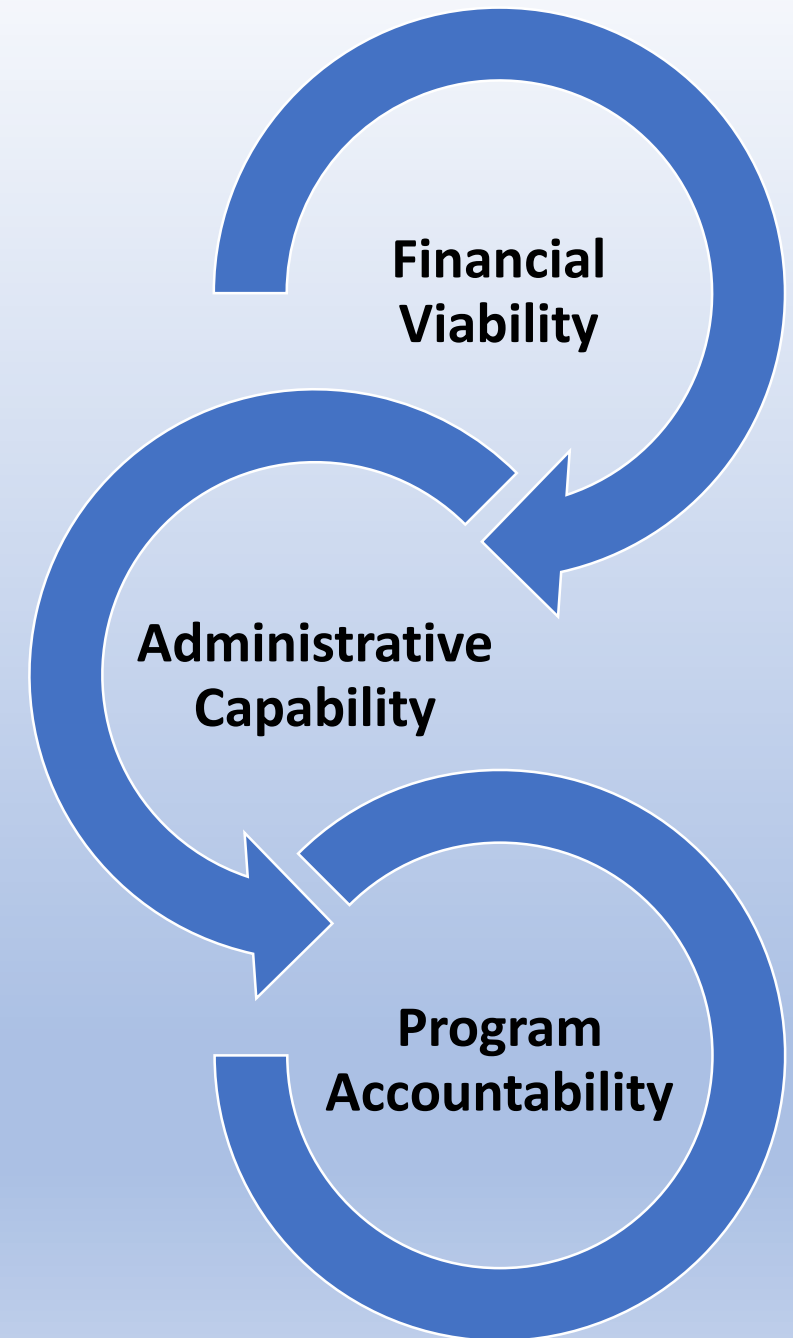
Why are Management Plans Important?

- They connect the organization's vision for the CACFP administration to all required meal service operations
- They document the organization's ability to provide compliant administrative and operating services to their CACFP facilities
- They detail CACFP performance standards
- They obtain and maintain approval to participate in the CACFP



Performance Standards 7 CFR 226.6(b)(2)(vii)

**Performance Standards
outline expectations for an
institution's
administration of the
CACFP.**



Financial Viability and Financial Management

7 CFR 226.6(b)(2)(vii)(A)

- Requires:
- Description of need and recruitment
- Fiscal resources and financial history
- Budget

**Regulations:
7 CFR 226.6, FNS
Instruction 796-2 Rev. 4,
2 CFR 200, subpart D
and USDA
implementing
regulations under 2 CFR
part 400 and 415.**

Administrative Capability

7 CFR 226.6(b)(2)(vii)(B)

- *You need:*
- Adequate number of knowledgeable and qualified staff
- Written policies and procedures



Program Accountability

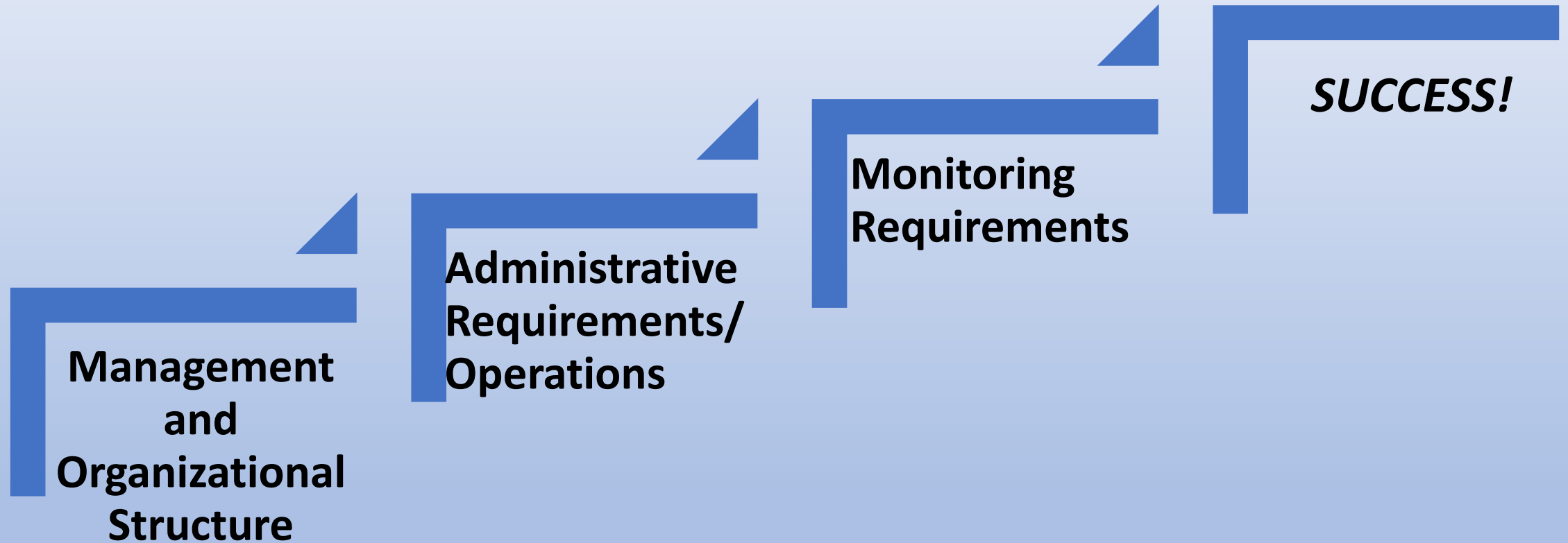
7 CFR 226.6(b)(2)(vii)(C)

- *You need:*
- **Written internal controls and safeguards**
- **Effective governing board oversight (non-profits)**

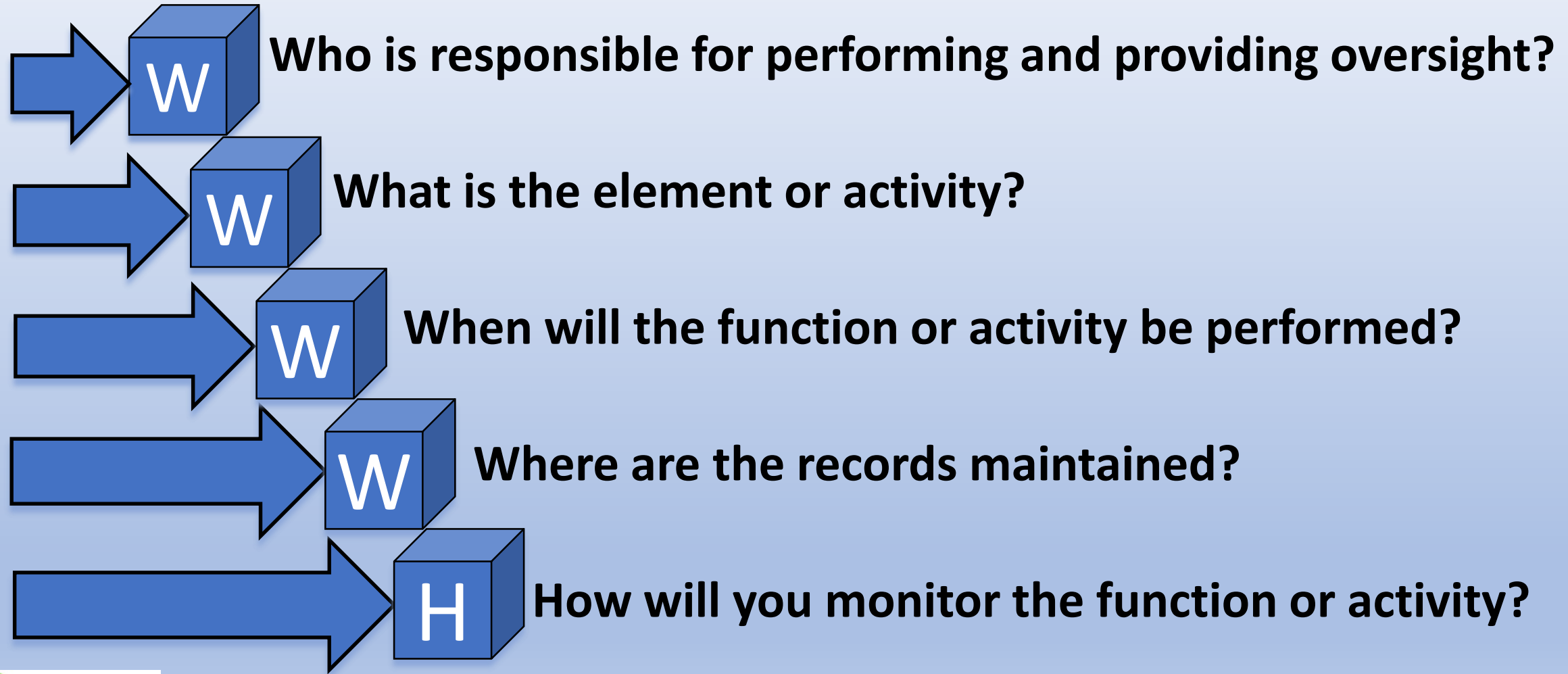
Purpose of Management Plans

- **Document your institution's policies and procedures**
- **Demonstrate your ability to fulfill your responsibilities as a CACFP organization**
- **Show your compliance with CACFP regulations, including the performance standards**

Components of Management Plans



Developing a Management Plan



Management and Organizational Structure

**Describes the
general
business
infrastructure
of the
organization**

Management and Organizational Structure

The elements include:

- *Organizational Structure*
- *Governing Board Compliance*
- *Financial Management*
- *Outside Employment Policy*



TEAMWORK

Together Each Achieves More

Organizational Structure

ELEMENT	TO DEMONSTRATE COMPLIANCE	RECORDS
Organizational Structure	<ul style="list-style-type: none">• Provide details on the staff positions needed to effectively administer and operate the CACFP• Describe the method for assigning the CACFP duties and responsibilities• Describe the organization's compensation policy including staff positions, work schedules, salary and wage ranges, and pay schedule and policy• Describe the process for ensuring compliance with civil rights requirements	<ul style="list-style-type: none">• Organizational chart• Job descriptions• Compensation policy• Agency's non-discrimination policy

Governing Board Compliance

ELEMENT	TO DEMONSTRATE COMPLIANCE	RECORDS
Governing Board	<ul style="list-style-type: none">• Describe the process for ensuring that a majority of board members are not financially vested in the agency or related to each other• Describe the process for ensuring that the Board Chair is independent of the Executive Director's control and has the ability to hire or fire the Executive Director• Describe how the Board's written policies and procedures are evaluated and enforced by all members	<ul style="list-style-type: none">• Conflict of interest statement• Board Chair's job description• Board's policies and procedures• Board's by-laws

Financial Management

ELEMENT	TO DEMONSTRATE COMPLIANCE	RECORDS
<p>Financial Management</p>	<ul style="list-style-type: none"> • Describe the process for ensuring that annual administrative reimbursements do not exceed regulatory limits of 15 percent of annual meal reimbursement (sponsoring organizations of centers affiliated and unaffiliated) • Describe how reimbursements are verified for accuracy and how the funds are disbursed within 5 working days (day care home sponsors and unaffiliated center sponsors) • Indicate the source of funds to cover temporary interruption of CACFP funds, overpayments and claims against the organization • Describe your financial management system and accounting practices 	<ul style="list-style-type: none"> • Administrative fee policy • Budget • Reimbursement policy • Financial management system and organizational accounting practices description

Outside Employment

ELEMENT	TO DEMONSTRATE COMPLIANCE	RECORDS
Outside Employment	<ul style="list-style-type: none">• Describe the process used to notify key staff of outside employment restrictions• Describe the process for documenting and evaluating outside employment of key staff• Describe the process for determining if outside employment constitutes a real or apparent conflict of interest	<ul style="list-style-type: none">• Outside employment policy

Administrative Requirements/Operations

- **Describes the organization's internal policies and procedures for CACFP's day-to-day operations**



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Administrative Requirements/Operations

The elements include:

Eligibility and
Enrollment

Validation of
Claim Data

Meal Pattern
Compliance

Recordkeeping
System

Administrative Requirements/Operations

Element	To Demonstrate Compliance	Records
Eligibility and Enrollment	<ul style="list-style-type: none">• Process to obtain Income Eligibility Forms (IEFs) and verify that they are completed and accurately classified• Process used to communicate errors or misclassifications of IEFs to sponsored facilities• Process used to collect and verify enrollment information and ensure it is available for all participants	<ul style="list-style-type: none">• IEF and Enrollment policy• IEFs and Enrollment forms

Administrative Requirements/Operations

Element	To Demonstrate Compliance	Records
Validation of claim data	<ul style="list-style-type: none">• How documents are collected or reviewed monthly to support the claim for reimbursement• Process used for evaluating claim data prior to submitting a claim for reimbursement• Process for performing required edit checks	<ul style="list-style-type: none">• Claim validation policy

Administrative Requirements/Operations

Element	To Demonstrate Compliance	Records
Meal Pattern Compliance	<ul style="list-style-type: none">• How the sponsor collects and verifies monthly menus• How facilities are notified of non-creditable meals• How reductions in reimbursement are handled	<ul style="list-style-type: none">• Menus• Disallowance policy• Meal pattern compliance policy

Administrative Requirements/Operations

Element	To Demonstrate Compliance	Records
Recordkeeping	<ul style="list-style-type: none">• Process for collecting and maintaining sponsored facility and sponsoring organization records• Process for revising forms to be consistent with federal and state requirements	<ul style="list-style-type: none">• Recordkeeping system• Record retention policy

Monitoring Requirements

Describes written policies and procedures used to ensure facility compliance



Monitoring Requirements

The elements include:

- Sufficient qualified staff
- Monitoring tracking system
- Evaluating reports



Monitoring Requirements

Element	To Demonstrate Compliance	Records
Sufficient qualified staff	<ul style="list-style-type: none">• Demonstrate that there is a sufficient number of qualified staff to perform all of the CACFP duties• Demonstrate the required number of full-time equivalent employees• Provide job descriptions	<ul style="list-style-type: none">• Staffing plan• Organizational chart• Job descriptions

Monitoring Requirements

Element	To Demonstrate Compliance	Records
Monitoring tracking system	<ul style="list-style-type: none">• Indicate the system used to document and track monitoring visits• Describe the process to ensure visits are conducted in compliance with CACFP regulations• Describe the process for adding or removing facilities from the system• Indicate the position responsible for maintaining the tracking system	<ul style="list-style-type: none">• Monitoring schedule• System description• Job descriptions

Monitoring Requirements

Element	To Demonstrate Compliance	Records
Evaluate reports	<ul style="list-style-type: none">• Indicate the position responsible for reviewing monitoring reports• Describe how many monitoring reports are evaluated• Describe how corrective action responses are reviewed and accepted or denied• Describe how the Serious Deficiency (SD) process is implemented	<ul style="list-style-type: none">• Quality review policies• SD policies and procedures• Corrective action policies

Recap of Components and Elements

Management and Organizational Structure

- Organizational Structure
- Governing Board Compliance
- Financial Management
- Outside Employment Policy

Administrative Requirements/Operations

- Eligibility and Enrollment
- Validation of Claim Data
- Meal Pattern Compliance
- Recordkeeping System

Monitoring Requirements

- Sufficient Qualified Staff
- Monitoring Tracking System
- Evaluating Reports

Management Plan Submission Time Frame

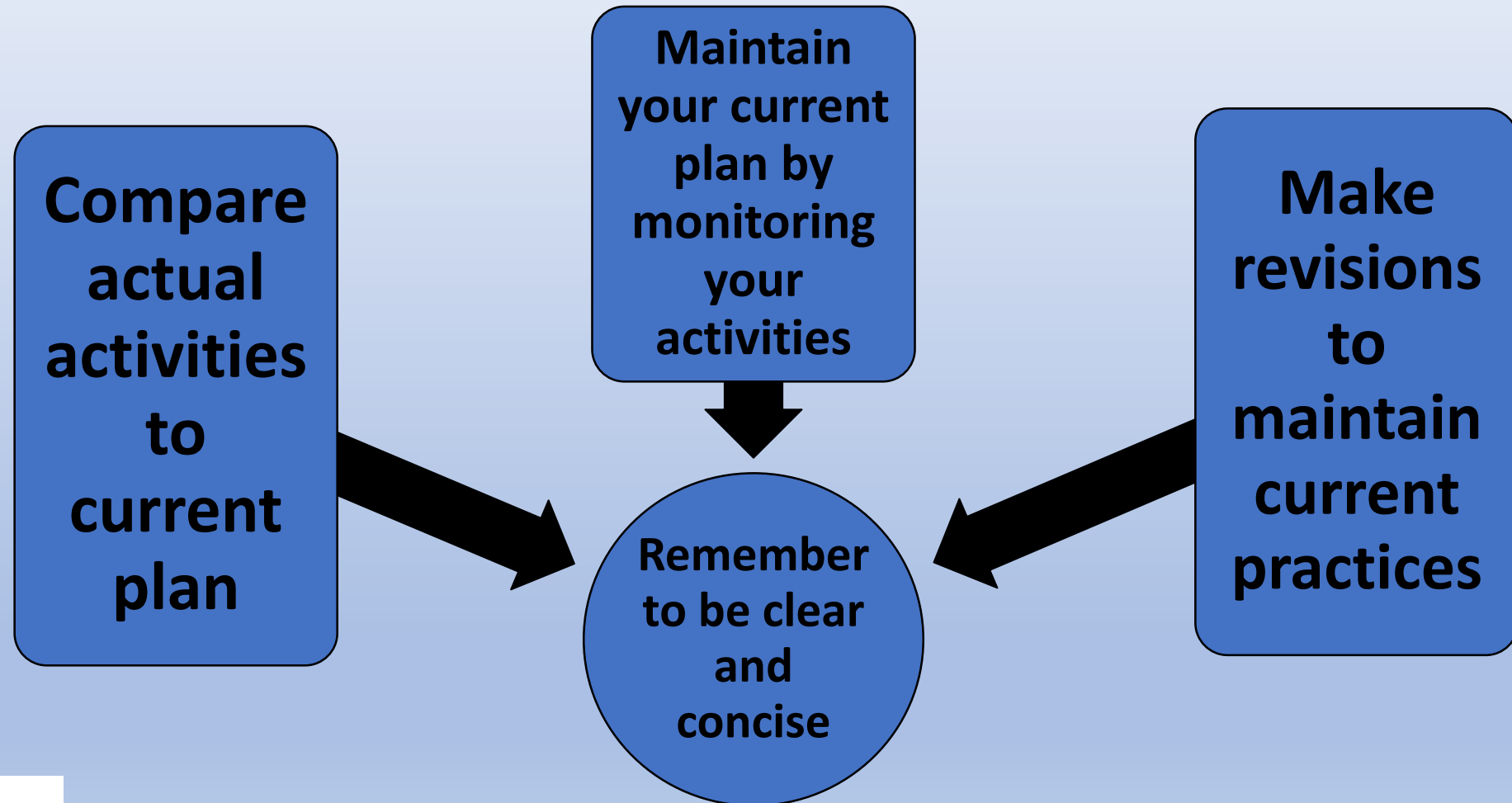
Submit:

- Initially with a new application
- Annually when updates are required
- Any other time required by the State Agency



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Evaluating and Monitoring Management Plans



Best Practices – Five E's

- **E**valuate the plan and ensure it answers who, what, when, where and how
- **E**nsure policies and procedures are specific and relevant to the program
- **E**nsure revisions are made in a timely manner as business practices change
- **E**quip your staff by providing training to all staff with CACFP duties
- **EMPLOY IT!**



Management Plans Recap

- Management Plans - definition and purpose
- Components
- Submission and time frame
- Evaluating and monitoring
- Best practices



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QUESTIONS

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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.

This institution is an equal opportunity provider.



New CACFP Creditable Food Items

The following food items are now creditable in the CACFP:

- Shelf-stable dried and semi-dried meat, poultry and seafood products
- Coconut and hominy
- Popcorn
- Tempeh
- Surimi seafood
- Pasta made from vegetable flour

Dried Meat, Poultry and Seafood Products

- FNS expects that these products will be most useful for field trips or picnics.
- Industry production standards vary widely, so:
 - These items will not be added to the Food Buying Guide; they require a CN label or Product Formulation Statement (PFS). A PFS must be evaluated as follows:
 - The PFS must show that the creditable meat ingredient is the same as (or similar to) the ingredient listed on the label.
 - The creditable meat ingredient on the PFS must be similar to a food item in the Food Buying Guide.
 - The creditable amount cannot exceed the finished weight of the product.



Hominy and Coconut

- Hominy may credit as a vegetable or a grain product.
 - In its whole form, hominy credits as a vegetable.
 - In its dried, milled form, hominy credits as a Whole Grain-Rich (WGR) grain product.
- Fresh or frozen coconut can be credited based on volume served.
 - The minimum amount of any food item that can be served and still be creditable is $\frac{1}{8}$ cup.
 - Coconut water credits as fruit juice.
 - Coconut is high in calories and saturated fat, and service should be limited as best practice.
- Corn masa, corn flour and cornmeal are now creditable as WGR ingredients



Popcorn

Popcorn now credits as a whole grain item.

- Popcorn is high in fiber, and fiber is under-consumed in America.
- $\frac{3}{4}$ cup of popped popcorn credits as $\frac{1}{4}$ ounce equivalent
- 1 $\frac{1}{2}$ cups of popped popcorn credits as $\frac{1}{2}$ ounce equivalent
- 3 cups of popped popcorn credits as 1 ounce equivalent
- FNS encourages providers to supplement popcorn with an additional grain product due to the large volume required to comprise a serving size.
- If popcorn is an ingredient in commercially prepared creditable food items, providers must obtain a PFS. Popcorn must be present in the product in the minimum creditable quantities of $\frac{3}{4}$ cup (1/4 ounce equivalent).



Surimi Seafood

Surimi seafood:

- A pasteurized, ready-to-eat, restructured seafood usually made from pollock (e.g. imitation crab meat).
- May contain as little as one-third seafood ingredient.
Without a CN label or PFS surimi seafood credits as:
 - 4.4 ounces credits as 1.5 ounce equivalent meat/meat alternate (ages 3-5)
 - 3.0 ounces credits as 1.0 ounce equivalent meat/meat alternate (ages 1-2)
 - 1.0 ounce credits as 0.25 ounce equivalent meat/meat alternate
- To credit differently (if a product contains more seafood), providers must obtain a CN label or PFS.



Tempeh

Tempeh is a soy based product that now credits as a meat alternate.

- 1 ounce of tempeh credits as 1 ounce equivalent meat alternate. This method of crediting is only for tempeh with ingredients limited to soybeans (or other legumes), water, tempeh culture (and for some varieties, vinegar, seasonings and herbs).
- Varieties of tempeh that include other creditable ingredients (such as brown rice, vegetables, etc.) require that providers obtain a CN label or PFS.
- Good source of copper, manganese and iron



Pasta Products Made of Vegetable Flour

Pasta made with one or more vegetable flours can now credit as a vegetable, even if no recognizable vegetable is served.

- ½ cup of pasta made with 100% vegetable flour credits as ½ cup of vegetables.
- Pasta made with vegetable flour and other ingredients will require a PFS that shows the volume of vegetable flour per serving. Grain-based pasta with a small amount of vegetable powder added for color is not creditable.

Pasta products made of 100% legume flour still require that a recognizable meat/meat alternate is also served. ½ cup of cooked pasta made from 100% legume flour may credit as 2 ounce meat/meat alternate.

Children must be taught that pasta made with vegetable flour is a vegetable (with signage, verbally, etc.)





QUESTIONS

Truly the End

Thank You

