

Delaware Department of Education  
Child and Adult Care Food Program (CACFP)  
Corrective Action Plan (CAP) - Frequently Asked Questions

**Q: What is a CAP?**

A: A CAP is a corrective action plan. It includes the steps the sponsor or site will take within a specific time frame to address the finding(s) of noncompliance and to prevent a recurrence. A CAP is intended to correct deficiencies in CACFP administration and operation to align with Federal regulations. Recurring findings could lead to serious deficiency and possible CACFP sponsorship termination.

**Q: Why are CAPs required?**

A: Corrective action is required to address program findings and to maintain program compliance. The State Agency assess the CAPs to see if a sponsor can demonstrate understanding of the finding and how to successfully correct it.

**Q: Why is it important to know the root cause of a finding?**

A: It is important to know the root cause of a finding because sponsors are correcting what caused the non-compliance. A root-cause analysis is necessary to get to the bottom of the issue. A tip to getting to the root is to ask “Why?”.

- For example, during a monitoring visit, a snack service is observed. The cook served grape drinks and saltine crackers. The menu states saltine crackers and 100% grape juice. According to 7 CFR226.20(a)(3) the snack is not reimbursable. Snack must include at least two of the five food components. Grape drink does not satisfy USDA meal pattern requirement because it is not 100% juice. During the visit, you ask the cook why she did not serve a creditable fruit. (Note: this is the first “why”). The cook shares that 100% grape juice is stated on the menu, but the delivery truck did not have the complete order so she used what was available. You then ask why didn’t you use another fruit or food component? (Note: this is the second “why”) The cook states she didn’t know grape drink was not creditable to satisfy USDA meal pattern guidelines. The root-cause is not the food order or the menu change, the root-cause is the cook’s lack of knowledge regarding creditable food items. Now the sponsor understands what needs to be addressed to correct the deficiency.

**Q: What must be stated in a CAP?**

A: The CAP must include “what,” “who,” “how,” “when,” and “where.”

- **What:** What is the process/procedure that will be implemented to permanently correct the finding? Identify the problem (specifically what caused the finding of non-compliance). It is important that the written process will directly address the root cause of the finding. Ask yourself why the finding of non-compliance occurred.

- **Who:** Who is responsible for implementing and complying with the process and internal controls? State name and title of who is responsible for duties including staff implementing and complying with the process as well as staff responsible for enforcing internal controls. It is important to also identify a staff person/position that will be trained to serve as a backup in case the person responsible for the action is not available.
- **How:** How will the facility ensure the processes and procedures are followed consistently to prevent recurrence? Communicate how compliance with the processes and procedures will be monitored and the frequency. Detail how and when the processes and procedures are communicated to all pertinent staff that has responsibility in adhering to and implementing the processes and procedures. State all internal control processes that will impact the process and procedure. State the frequency of the internal control process. State when the new policy will be shared with staff (staff meeting and/or training dates). Retain documentation of meeting and/or training agenda.
- **When:** When will the processes and procedures be implemented? Provide a specific date, not a time frame.
  - Correct: 5/21/22
  - Incorrect: in two weeks, as soon as possible
- **Where:** Where will documents be retained? Documents may be required as part of the CAP. Documentation can be uploaded in DENARS. Those documents must be maintained by the Sponsor. State location of new written processes and procedures. State location of documents supporting the process and procedures.

#### Example of an acceptable CAP

Using the example above, snack did not include all of the food components (grape drink served in place of 100% grape juice).

#### **Finding**

The Sponsor must be in compliance with 7 CFR 226.20(a)(3) by ensuring that all snacks meet the USDA meal pattern for each age group. The sponsor must submit a detailed policy that will ensure staff responsible for preparing meals are knowable of USDA meal patterns and creditable food components. The detailed policy must include: 1. What is the root cause of the finding; 2. Who (name and title) is responsible for implementing and complying with the processes and procedures of the policy; 3. How compliance with the policy will be monitored (for example, provide an internal control system outlining how and frequency of policy processes review); 4. How and when the policy will be communicated to staff (including training and/or meetings) 5. When the policy will be fully implemented (specific date); 6. Where will the new policy and supporting documentation be stored. Provide DDOE supporting documentation such as training and /or meeting sign-in sheets and agendas and written internal control system.

## **CAP**

Policy Title: USDA Creditable Foods / Meal Pattern

- **What:** Policy ensures staff is knowledgeable of USDA creditable foods and meal patterns.
- **Who:** Responsible parties are Betty Shabazz, Administrator; Coretta Scott, Assistant Administrator/CACFP Contact; Roland Martin, Cook; Nina Simone, Teacher; Kendrick Lamar, Teacher; and Michelle Robinson, Lead Teacher.
- **How:** Internal Control: Every six months Mrs. Shabazz will pull menus to ensure substitutions are creditable.

Ms. Scott will train staff responsible for CACFP duties within the first week of employment prior to conducting CACFP duties. CACFP training includes USDA creditable foods and meal patterns for each age group.

Monthly Ms. Scott will meet with the cook and lead teacher to discuss creditable foods and meal patterns.

- **When:** The policy will be communicated to staff during a scheduled staff meeting on Feb. 14, 2022. Training will take place on Feb. 21, 2022. The policy will be fully implemented on Feb. 28, 2022. The first meeting between Ms. Scott, Mr. Martin, and Ms. Robinson will take place on March 14, 2022.
- **Where:** Policy and supporting documentation will be stored in Ms. Scott's office.

Parts of this document were adapted from the CACFP Operational Resources and Education Curriculum (CORE).

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