How to Complete a Corrective Action Document

Child and Adult Care Food Program - Nutrition Services Branch – Division of Public Health

Welcome

I am glad you were able to join me for today's training. I am Jonathan Dudzik, and I am an Administrative Officer with the **CACFP Nutrition Policy and Training Team**. I will be your learning facilitator for today's session entitled: How to Complete a Corrective Action Document.

Let's get started.

Learning Objectives

Let's look at the learning outcomes of today's training. By the end of this training you should be able to:

1. Explain what a Corrective Action Document is
2. State why a Corrective Action Document is necessary
3. Identify components of a Corrective Action Document
4. And answer key questions for completing a Corrective Action Document

What is a Corrective Action Document?

Well, a Corrective Action Document is a written document that explains how an institution will fully and permanently correct a program violation that comes out of a compliance finding.

Why Complete a Corrective Action Document?

Institutions complete a Corrective Action Document because:

- It is required by Federal Regulation -7 CFR 226.6 (c)
- And to describe how they will correct program violations

How it Works!

The process involves 4 steps:

1. A compliance review is conducted.
2. When Program Violation(s) are discovered
3. The institution is required to complete a Corrective Action Document to correct the program violation or violations
4. State agency reviews the Corrective Action Document and approves it or sends it back to the institution for revisions

Remember, institutions are required to submit a separate Corrective Action Document for each program violation/finding.

Examples of Program Violations

Here are three examples of program violations. How many Corrective Action Documents would be needed given these examples?...

1. Failure to complete participant enrollment forms
2. Incomplete Income Eligibility Applications
3. Unauthorized personnel have access to confidential program participant information

The answer is three – one for each program violation.

Corrective Action Document

Please have a copy of the Corrective Action Document form ready because I will be referring to this form a we go through the remainder of this training.

Supporting Documentation

Supporting documentation must be submitted with the Corrective Action Document.

Take a moment to look over these examples:

Supporting Documentation

Some Examples
- ✓ Income eligibility forms
- ✓ Enrollment forms
- ✓ Staff training documentation
- ✓ Site monitoring reports
- ✓ Attendance Records

Some Examples
- ✓ Menus
- ✓ Meal count forms
- ✓ Child Nutrition Labels
- ✓ Itemized food recipes

Supporting documentation must be submitted with the Corrective Action Document

Corrective Action Document: Institution Information

The next section of the Corrective Action Document asks for institution information including:

1. The name of the institution
2. The institution's agreement number
3. The full name of the Responsible principal (for example, the owner or Executive Director)
4. The responsible principal's date of birth
5. The institution's mailing and street address. If they are the same, you can write "same" under the street address
6. And the county of the institution

Under the Institution Information section, you will be asked to Restate the Program Violation: You can obtain this information from the Compliance Review form. List one (1) Program Violation per form.

Five Key Questions

Next the Corrective Action Document asks you to answer 5 key questions:

1. Who will address the Program Violation?
2. What are the procedures for correcting the Program Violation(s)?
3. When will the procedures be implemented?
4. Where will the document be retained?
5. How will staff be informed about the new policies and procedures?

Who Will Address the Program Violation?

Answer the first question by identifying who will address the program violation. Be sure to list all personnel responsible for this task and their titles.

What are the Procedures that will be implemented?

The second question states, "What are the procedures that will be implemented to address the Program Violation?"

This can be answered by listing the program violation found in the compliance review form. List only one program violation per form.

Be sure to provide a detailed description, that is, a step-by-step procedure and the actions that will be taken to correct the program violation.

When will the Procedure be implemented?

Next provide a timeline for implementing procedures for fully and permanently correcting the program violation. Use the implementation date and then explain how often the procedure will be done (for example, daily, weekly or monthly).

Where Will the Corrective Action Documents Be Retained?

Here is what the "where?" section of the Corrective Action Document looks like.

It is a best practice to keep program documentation filed in a secure area and locked.

How will staff and Facilities be Informed?

The "How" section of the Corrective Action Document requires you to explain how staff and facilities will be informed about the new policies and procedures for fully and permanently correcting program violations.

You can use one or more ways to inform staff of new policies and procedures for correcting a violation. For example, handbooks, training sessions, or websites.

Authorized Signature

Make sure your Corrective Action Document has the printed name of responsible principals and their signatures.

Quick Review

Let's do a quick review of what we covered in this training.

When submitting a Correct Action Document remember to

1. Fill out all sections completely

2. Submit supporting documentation to verify procedures have been implemented and the program violation has been corrected

3. Answer 5 key questions (what, who, when, where, how)

4. Use step-by-step procedures to show how you will correct the program violation

5. And have an authorized representative sign and date the form

Submitting a Corrective Action Document in NC CARES

Now we will look at the steps for submitting the corrective action document on NC CARES.

Logging into NC CARES is the first step. Once logged in, clicking on the Compliance tab along the top of the screen should bring you to a page that looks like this.

Clicking on Details under the Actions column will take you to the review dashboard where you can find general information about your Compliance Review.

Once on the Review Dashboard, you will see a box that is titled, "Review Tools".

Within that box you can View or Modify your Corrective Action Document.

Click on Modify in order to add attachments or notes to each Corrective Action Document that is required as a result of the Review. Remember, you may have multiple violations that require documents. Each Corrective Action Document will be listed separately on the next page.

Child and Adult Care Food Program

NCDHHS

Applications | Claims | Compliance | Reports | My Account | Search | Year | Help | Log Out

Review Tracking > Dashboard > Corrective Action Documents - Findings >   Program Year: 2017 - 2018

CACFP Review Findings

Corrective Action Documents   **Review ID:**

Total CADs Required

🟦	Not Started	1
🟧	Pending Action	0
🟨	Pending Submission	0
🟪	Pending Approval	0
🟥	Returned	0
🟩	Accepted	0

CAD Counts

Total Number of CADs:	1
Number of Institution CADs:	1
Number of Facility CADs:	0
CAD Due Date:	
Institution Access Start Date:	
Institution Access End Date:	

Review Findings and Corrective Action Documents

Update All Open and Returned Corrective Action Due Dates: [   ] ✦ [Update]

Institution Findings

Not Started	Pending Action	Pending Submission	Pending Approval	Returned	Accepted	Total
1	0	0	0	0	0	1

Action	Area	Question	CAD?	Status	Due Date
View | Modify	100 - Licensing & Eligibility	106 - Date of most current Sanitation Inspection:	Y	Not Started	10/18/2017

Add New Finding

The next page is the Findings page. Once there you will see each Corrective Action Document listed separately in the Institution Findings box.

In this example, there is only one Corrective Action Document, but the findings of a review could result in more than one being required.

On the screen, locate the specific Corrective Action Document that you want to work on, and click Modify.

CACFP Reviews
Findings Details

Review Findings and Corrective Action Documents   **Review ID:**

Form:	400 - Civil Rights
Question:	413
	Have all key staff received annual civil rights training conducted by the State Agency in the previous three years?
Finding ID:	V-0400
	Civil Rights requirements are not met.

Special Instructions:

Institution Corrective Action Response:

Document Attachments

A Institution may submit supplemental information related to their Corrective Action by selecting the 'Add an attachment' link.

Action	Comments	Uploaded By
Add an attachment		

Dates

Submitted for Acceptance:

Accepted by Reviewer:

Created By: stateuser6 on: 10/11/2017 2:35:53 PM

[Save] [Submit For Acceptance] [Accept CAD] [Cancel]

Your Findings Details page should look similar to this. Scroll down until you find the Document Attachments Section.

Next, click on Add an Attachment.

Document Attachments

A Institution may submit supplemental information related to their Corrective Action by selecting the 'Add an attachment' link.

Action	Comments	Uploaded By

Add Attachment

To add an attachment, supply a comment describing the attachment, then click the Browse button and select the file to attach.

Comment

Browse...

Cancel   Upload

Dates
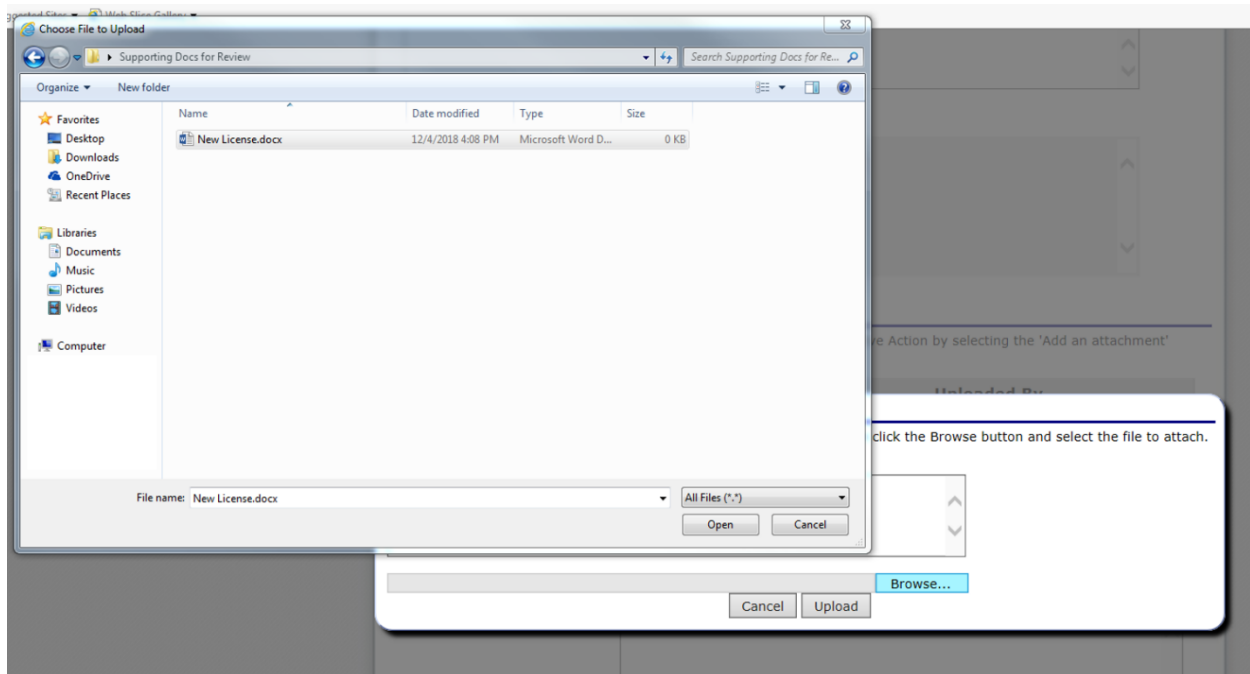
Submitted for Acceptance:

Accepted by Reviewer:

You should see this Upload box appear.

Use the Comment text box to briefly explain what the document is and if it is a new revision or version of a document that was previously attached.

Click the Browse button to find the file on your computer's hard drive.

Once you have located the file using the navigation window, shown here, click Open.

Document Attachments

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Action	Comments	Uploaded By

Add Attachment

To add an attachment, supply a comment describing the attachment, then click the Browse button and select the file to attach.

Comment

Desktop\Supporting Docs for Review\New License.docx   Browse...

Cancel   Upload

Dates

Submitted for Acceptance:

Accepted by Reviewer:

You should see now see your file referenced in the location bar.

To finish uploading the file, you must click on the Upload button.

CACFP Reviews
Findings Details

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Action	Comments	Uploaded By
View	BCDC procedure	
View	CAP 1728	

Dates

Submitted for Acceptance:

Accepted by Reviewer:

Created By: stateuser6 on: 10/11/2017 2:35:53 PM

| Save | Submit For Acceptance | Accept CAD | Cancel |

After uploading the file, you will be directed back to the Findings Details page.

Scroll down to the bottom of the screen and first verify that your file attached correctly by seeing it in the Document Attachments section.

Finally, make sure you click the save button at the bottom of the page.

Additional Points

Here are some additional points to keep in mind

1. Remember to attach your supporting documentation the same way that you attached the Corrective Action Document form
2. Instead of attaching the Corrective Action Document form, you can type your step-by-step procedures for correcting the program violation in the Institution Corrective Action Response box
3. However, if using the Response box to submit your Corrective Action Document, you must include all the information that is included in the Corrective Action Document form.

CFDA and the Federal Awarding Agency

The state agency is required in trainings to always inform institutions of the Federal award information, including the Catalog of Federal Domestic Assistance (CFDA) title and number, and the Federal awarding agency.

- The CFDA Title is Child and Adult Care Food Program.
- The CFDA Number for CACFP is 10.558. This is an identifying number that a federal program is assigned in the Catalog of Federal Domestic Assistance.
- The Federal awarding agency is United States Department of Agriculture, Food and Nutrition Service.
- If you are audited, the auditor may ask for this information.

Please keep this information on file.

The Non-Discrimination Statement

A friendly reminder that administrators and institutions participating in USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activities in any program or activity conducted or funded by USDA.

The Child and Adult Care Food Program Agreement for Institutions states that no person shall be excluded from participation in, be denied benefits of, or otherwise subject to discrimination under the Child and Adult Care Food Program receiving financial assistance from USDA.

Penalties for Fraud

The Penalties for Fraud statement explains the consequences for committing fraud against this federally-funded program. As you can see, penalties may include a fine, imprisonment or both.

Contact Information

Questions? Contact your NC CACFP Training Team CACFPtraining@dhhs.nc.gov