Name and Address of Center:					Washington Office of Superintendent of PUBLIC INSTRUCTION					Name of Sponsoring Organization:					
					Child Adult Care Food Program										
Re	equired Visit: (	circle or	ie)			Sponsor Mo			_		Reviewe	r/Mon	itors' Na	me:	
1	2	3	F/L	J	(Affil	iated and U	naffiliat	ed Cen	iters)						
License # and/or Certification:				Ef	f. Date Capacity Enrollment Date of				Review	Arriv	al Time	Dep	parture Time		
Meals Approved to Claim:				Mea	al Observe	ed:					Date of Last Site Review:				
В	MS L	AS	S ES	В	AM L	S ES			ł	te of Last F \P Required			No		
				N	Non-Meal I	affiliated only)				iled 5-Day		•	No		
RE	CORD KEEPIN	IG/ELIGII	BILITY REQU	JIREM	IENTS		YES	NO	N/A		Comments				
1			rent license a limits, and st												
	The center ha	s a currer	nt license/perr								Date of las	st inspe	ection:		
·.	The center ha			nent ro	oster for cu	rrent									
	year.  Copies of comevery participation		EA's are on fi	ile at th	ne center fo	or									
<u> </u>	Institution is u		nt/guardian s	ignatu	re or institu	ution's									
	representation	n consiste	ently and have	identi	ified which	is used.									
i.	Copies of com	enter for													
	months, if applicable.  If for-profit, the center has the required number of low-income participants enrolled to be eligible for the CACFP.					/-income									
١.	The center is and copies of	taking da	ily attendance	e on ar	n approved										
١	the center for	all enrolle	ed participants	S.											
٠.	plus the prior less than three	three yea													
0.	If the center I	has a cor		servic	ce, a curre	nt contract is	5								
1.	The institution program eligib	only clai	ms meals ser	ved to	participan	ts that meet									
2.	At-Risk sites	included	verified enrich	nment	activities.										
3.	At-Risk sites a location.	are correc	tly qualified u	ısing a	ırea eligibil	ity for the									
4.	If applicable, fin compliance				e is used o	correctly and									
5.	If applicable, f menu food ite according to F	ms are di	fferent and O												
6.	The institution program response	has writt	en policies ar												
							YES	NO	N/A	C	Comments				
7.	Program staff, from commun			s and	participant	s are free									
8.	Program staff, wash hands p	, voluntee	rs, substitute												
9.	Food is obtain	ned from													

Phy	sical Environment/Food and Nutrition (cont.)	YES	NO	N/A	Comments
20.	Refrigeration units are maintained at 41° F or below and freezers	;			
	are maintained at 0° F or below.				
21.	Cleaning supplies are stored separately from food.				
22.	There is no evidence of rodent or insect infestation.				
23.	Potentially hazardous foods are maintained, and (if contracted), delivered and served at the proper temperatures.				
24.	Prepared food is stored in clean, covered containers that are				
25.	clearly labeled and marked with date of preparation.  Proper procedures are followed for washing, rinsing, sanitizing utensils, food preparation equipment, and food contact surfaces.				
	hen observing a meal, answer all questions in the following senters only), answer questions marked with an asterisk (*) and		all othe	ers "N/A	Δ"
<u> </u>	MEAL OBSERVATION	YES	NO	N/A	COMMENTS
26.	Posted Menu:	Ohser	ved Mes	П с	Same as posted menu
		ODSCI	ved ivide	<b>—</b> C	anie as posted menu
27.	The observed meal was served at the proper time.				
	The observed meal corresponds to the posted menu.				
28.	The observed meal contains all required components, served in the required quantities. If no, list any missing and/or inadequate components:				
29.	If contracted, the observed meal meets all requirements of the contract, including delivery, receipt and service.				
30.	All the meals on the posted menu meet minimum CACFP meal pattern requirements.				
31.	If using commercially processed/main dish combination foods, the center is following regulatory guidelines.				
32.	Ready-to-eat cereal products served contain no more than 6 grams of sugar, per dry ounce				
33.	One grain serving per day, across all eating occasions, is 100% whole grain or whole grain-rich. This is also clearly identified on posted menu.				
34.	Grain based desserts are not served as part of a reimbursable meal.				
35.	Juice is served no more than once a day.				
36.	Flavored milk is not served to participants under 6 years of age.				
37.	If served, flavored milk is fat-free (skim) or low-fat (1%) milk and is served only to participants 6 years and older.				
38	Low-fat (1%) and/or fat-free (skim) unflavored milk is being				
00.	served to participants age 2 and older and unflavored whole milk is served to participants age 1.				
39.	Yogurt contains no more than 23g of total sugars per 6 oz.				
40.	The center follows regulatory requirements for feeding infants.				
41.	If applicable, parent notes and/or medical statements are maintained on file authorizing menu substitutions.				
42.	An accurate meal count is taken at the point of service and consolidated by the end of the day.				
43.	If required, the center records meal counts by name.				

	MEAL OBSERVATION (cont.)	YES	NO	N/A	COMMENTS						
	If taking meal counts by name, or by individual classrooms, the site consolidates them on a monthly meal count record form.										
	TRAINING AND MONITORING	YES	NO	N/A	COMMENTS						
45.	Program staff have attended required sponsor training.										
	Issues of non-compliance noted on previous reviews have been completely and permanently corrected.										
	CIVIL RIGHTS	YES	NO	N/A	COMMENTS						
	The organization allows equal access to its site and provides meals regardless of race, color, national origin, sex (including gender identity and sexual orientation, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.										
	The "And Justice for All" poster is posted in a conspicuous place.										
	The WIC flyer and Building for the Future letter are posted in a conspicuous place or distributed to parents.										
50.	Race and ethnicity data is collected.										
	5-	DAY TE	ST								
49.	Meal count on day of reviewDo not complete	for a no	n-meal	review (	Unaffiliated only)						
	cord meal counts for the same meal type observed on the day o 5 previous weekend day meal counts for weekend reviews.	f the visi	t for ead	ch of the	previous 5 consecutive meal service days. Use						
Da	+ + + + tes:	+	=	= Meal C Tot							
50.	Dates:										
51.	If #50 was answered "No," was the explanation provided adec	ιuate?	Υ	′es	_(Center "passed" 5-Day Test)						
			N	lo	_(Center "failed" 5-Day Test; CAP and follow-up are required)						

Date	Enrollment	Attendance Total	Total Meal Counts							
Date	Total		Breakfast	Morning Snack	Lunch	Afternoon Snack	Supper	Evening Snack		
	L									
any meal	counts for the five	consecutive days rev	riewed exceed	the docume	nted enroll	ment	Yes 1	No		

Note: If meal counts, enrollment records and attendance records cannot be reconciled, monitor should expand review to include specific children. A meal disallowance may be necessary.

REVIEW AND SUMMARY	YES	NO	N/A	COMMENTS
54. Is a disallowance required?				
55. Is a Corrective Action Plan (CAP) required?				Due Date for CAP:
56. Is a Follow-Up review required?				
57. If administering waivers, applied accurately.				

Item #		Review Summary	
If required, The CA	P must describe those actions being taken to o	correct each issue of noncomplian	ce and the date by which
each issue of nonc	ompliance will be corrected.	·	•
TRAINING N	ATERIALS PROVIDED:		
Center Repr	esentative:		Date
·			<u> </u>
Sponsor Rep	resentative:		Dete
			Date
0	paged Darby Charles		
Sponsor's S	econd Party Check:		Date

# INSTRUCTIONS FOR COMPLETING Sponsor Monitoring Form

(For Sponsors of Affiliated and Unaffiliated Centers)

**HEADING:** Complete each block with the appropriate data.

When doing reviews where a meal service is not observed (Sponsors of Unaffiliated Centers only), reviewers should mark "Non-Meal Review" and indicate "N/A" for those portions of the review form related to meal service. Also, for planned non-meal reviews, the 5-Day Test should be marked "N/A" but the 5-Day Reconciliation must still be completed. If using the form to conduct a Follow-Up Review, complete the portions of the review form related to the deficiencies noted on the previous review; for all other questions, reviewers should mark through and indicate "N/A."

#### RECORD KEEPING/ELIGIBILITY REQUIREMENTS:

- 1. A center must have a current license posted in the facility. Observe the number and age range of children and the number of teachers present. Compare your observations to the site's licensed capacity. Report any violations to the licensing authority and disallow any meals served over capacity.
- 2. a. A valid licensing inspection report issued by the Department of Children, Youth and Families (DCYF) must show compliance under the categories for *Physical Environment/Food and Nutrition*.
  - b. Sites under local county licensing authority must have a valid satisfactory food service inspection report, permit, or certificate.
  - c. Note the date of the last inspection on the review form.
  - d. If the inspection report does not indicate compliance, note whether or not a Follow-Up inspection has been conducted indicating that the violations have been corrected. If there is no evidence of compliance on the report, it would be a finding and a Corrective Action Plan (CAP) and Follow-Up must be completed.
- 3. Review the enrollment roster and verify that participants are enrolled and withdrawn on a continuous basis. Compare the enrollment roster total to the daily attendance totals. It must be at least as high as the highest daily attendance figure. If completed by the sponsor check N/A.
- 4. EIEA's must be on file for <u>each</u> participant who is claimed as free or reduced and reviewed for accuracy and completeness. Review 10% of files. If completed by the sponsor check N/A.
- 5. Self-Explanatory.
- 6. Ensure that there is a complete and accurate Infant Feeding Form on file for all enrolled infants.
- 7. Verify that the center meets the 25% requirement for the prior month by comparing Title XIX attendance records or Free and Reduced applications to center's total enrollment or capacity, whichever is less. This documentation should be reviewed at the sponsor's office prior to the on-site review.
- 8. The center must use the OPSI attendance form or an approved alternate form or system.
- 9. Program records must be maintained for 3 years plus the current fiscal year. It is recommended that the center keep at least the current month plus the previous 12 months of records on-site. The rest of the records may be kept at an off-site but must be made available for review upon request.
- **10.** For vended meals, the center has a copy of the vended agreement, and the contract is being followed. Request copy of Vended Contract or FSMC to determine that current meal service is reflected as determined.
- 11. The center is only claiming meals for participants that meet program eligibility requirements, only participants that meet the age requirements and eligibility determination are served CACFP Meal Service.
- 12. If the center offers At-Risk meals, enrichment activities are offered to participants.
- 13. If the center offers At-Risk meals, the location meets area eligibility for At-Risk meal service.
- 14. If the center offers At-Risk meals, and a share table is used, the share table is being implemented according to FNS requirements, including health and safety requirements.
- 15. If the center offers At-Risk meals, and Offer V Serve is used, the menu includes different food items and is being implemented according to FNS requirements.
- 16. Essential CACFP duties are clearly assigned in a written document highlighting the responsibilities (example: Point of Meal service assigned to classroom staff and procedure to complete correctly including when to

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#### \*PHYSICAL ENVIRONMENT/FOOD AND NUTRITION:

- 17. Verify through observation that employees maintain a high degree of personal cleanliness in the food preparation and storage areas, and when serving food to participants.
- 18. Observe whether staff preparing meals are washing hands prior to food preparation. Observe whether participants are washing their hands before the meal service. Verify that hand washing sinks in the kitchen and the bathrooms are supplied with hand soap, disposable towels, or hand drying devices.
- 19. Ensure that food is obtained from approved sources that meet federal and state health standards. Foods used in CACFP reimbursable meals must not be obtained from private homes, or unlicensed/non-permitted sources Food must not be adulterated, temperature abused, misbranded, or spoiled.
- 20. Verify that the center has thermometers in refrigerators and freezers and that the correct temperature is maintained; refrigerators must be maintained at 41° F or below and freezers must be maintained at 0° F or below.
- 21. Self-explanatory.
- 22. Self-explanatory.
- 23. Hot foods must be maintained at 135° F or higher; cold foods must be maintained at 41° F or lower. Frozen foods must be thawed in the refrigerator, under cold running water, in the microwave, or as part of the cooking process. For contracted meals, verify the process by which a site ensures the food is delivered at the proper temperatures by the vendor. Hot foods must be delivered at 135° F or above and cold foods must be delivered at 41° F or below. If temperatures are not at the approved levels the food must be refused and sent back to the vendor.
- Observe the handling of food. Any unused foods must be discarded or stored properly:
   ♠ Potentially hazardous vended food must be discarded after meal service with the exception of refrigerated milk
  - ♠ Self-prep foods may be refrigerated and stored for up to seven days in properly, covered containers or bags that are clearly labeled and marked with date of preparation.
- 25. Ware washing and sanitation may be accomplished by use of a dishwasher with sanitizing cycle, installed three compartment sinks, or an installed two compartment sink and non-stationary or portable compartment receptacle used to sanitize. Sites must have a means to measure a sanitizing method (heat strips for dishwashers or test kit to confirm concentration of sanitizing solution).
  - \*If any findings are of a serious safety concern to participants, notify the local licensing authority (i.e., fire, health, and/or safety hazards).

#### **MEAL OBSERVATION:**

Note: When observing a meal, answer all questions in the following section. For a non-meal review, answer questions marked with an asterisk (\*) and mark all others "N/A".

26. **Posted Menu:** List all foods planned to be served to the participants during the meal service.

**Observed Meal:** List all foods served to the participants during the meal service, on the day of review. Check the box if the observed meal is the same as the posted menu. Items served should match the posted menu. (See instruction in #24)

- 27. The center should be serving meals during the times indicated in WINS.
- 28. Compare the meal served with the posted menu; the menu must reflect the actual meal served. If more than one item has been substituted, discuss the importance of menu planning. If vended, substitutions must be agreed to by both parties prior to delivery.
- 29. Observe the meal served and determine if all required components and required quantities are served. List any missing and/or inadequate components in the comments section.
- 30. Complete Catering Contract Review accordingly and attach copy to the Sponsor Site Review Form. Identify all deficiencies in the review summary section of the Sponsor Site Review Form
- 31. Disallow all meals on the posted menu that do not meet the minimum meal pattern requirements (for all meals that have already been served and recorded). For future meals, provide technical assistance and allow the menus to be corrected.

- 32. Ensure that all processed/main dish combination products have a CN label or Product Formulation Statement. If supplemental items are used, ensure that they meet the CCFP policy. If corrections are made during the meal service, a disallowance is not required. If the meal does not meet the requirements, a disallowance should be issued.
- 33. Ensure that the menu lists cereals by name; ready-to-eat cereals (cold and hot) must contain no more than 6 grams of sugar per dry ounce (see WIC-Approved Cereal List).
- 34. Ensure that one serving of 100% whole grain or whole grain-rich is served a minimum of once per day. The menu must clearly identify the whole grain or whole grain-rich item such as "WG bread" or "WGR crackers."
- 35. Ensure that grain-based desserts (e.g., granola bars, cookies) are not served as part of a reimbursable meal. Grain based desserts may be served as an "extra". Graham crackers and animal crackers are creditable.
- 36. Juice must not be served more than once a day.
- 37. Ensure that flavored milk is not served to children under 6 years of age. Flavored powder/liquid may not be added to milk (cow or soy) for children ages 1-5.
- 38. Ensure that flavored milk is fat-free (skim) or low-fat (1%) milk and served only to children 6 years and older.
- 39. Between a child's first and second birthday, unflavored whole milk is required. After the child's second birthday, low fat (1%) or fat-free (skim) unflavored milk is required. If this requirement is not met, the sponsor must disallow any meals for children on the Monthly Meal Count Record in the categories of 3-5 years and 6-12 years old. (Meals for 2-year old's will not be disallowed since the Monthly Meal Count Record combines ages 1-2 years old). Flavored milk may only be served to children ages 6 and older. If flavored milk is served, it must be fat-free (skim) or low-fat (1%). Reminder: A parent's note must be provided for non-dairy milk substitutions (i.e., soy milk). The note must state the medical or special dietary condition that restricts the diet of the child and whether the provider or parent will supply.
- 40. Observe the meal served for "eye appeal."
- 41. If the provider is claiming infant meals, observe the meal to determine if the infant meal pattern is being followed. Infant meals containing foods provided by the parent and served to infants, birth through 11 months, may include no more than one component provided by parent. Meals containing only breastmilk (expressed by mother and fed by provider or fed directly by mother), may be claimed for reimbursement. Refer to the Feeding Infants handbook for additional guidance. Check to ensure that Infant Feeding Forms are completed by the parents and are on file.
- 42. If you identify any children with special diet restrictions, and exceptions to the meal pattern are being made, check the enrollment files to see if there is signed statement from a recognized medical authority. If a milk substitute is provided, ensure it is an approved brand. Modifications to the meal pattern for religious reasons or food preferences that still meet the minimum meal pattern requirements may be made by parent request. Meals with substitutions that meet all meal pattern requirements are reimbursable. However, when a substitution is made and the meal pattern is not met, a medical statement is required and must contain the following three elements: a description of the child's physical or mental impairment that restricts the diet; what must be done to accommodate the child (foods to be omitted and foods to be substituted), and signature of a licensed physician, physician's assistant, or nurse practitioner. For children with a documented disability, parents may supply one or more components of the reimbursable meal as long as the provider provides at least one component. For non-disability meals (preferences), parents may supply no more than one component of the reimbursable meal.

- 43. Observe staff at mealtime and question them as to how meal counts are recorded. Meal counts must be taken at the point of service, i.e., while children are actually eating or as they are being served; attendance records are not allowed to be used to determine the number of meals served. Record your own count of the observed meal and compare it to the meal count taken by the center staff. Remember to include all infants that will be included in the meal count although they may be eating at another time.
  - Also, meal counts must be recorded within one hour of the meal service. They may be recorded on a form other than the Meal Count Record as long as they are posted to the Record at least daily. Check to see that all meals prior to the observed meal have been recorded. Disallow all meals not recorded prior to your visit.
- 44. If any meal counts exceed the licensed capacity of the center or if four or more meal types are claimed, meal counts must be taken by name of child. Disallowances may be issued, if necessary.
- 45. If meal counts are taken by name, or by individual classrooms, a standard Meal Count Record form must also be completed and totaled at least daily (by the end of the day).

#### TRAINING AND MONITORING:

- 46. Check to see if the director or other responsible individual(s) has attended required sponsor training. Check your records or speak with the director to obtain documentation agendas and sign-in sheets. At a minimum, training must include the following topics: meal patterns, meal counts, claims submission and review procedures, record keeping requirements, and the reimbursement system.
- 47. Check previous reviews for issues of non-compliance. Also review submitted Corrective Action Plans (CAPs). Check to ensure that previously identified issues of noncompliance have been corrected according to the plan outlined in the Corrective Action Plan.

#### **CIVIL RIGHTS:**

- 44-47. Ask the director and staff what their enrollment policy is and the method used to collect race and ethnicity data. Self-identification and self-reporting are the preferred method to collect race and ethnicity data. The civil rights poster ("And Justice for All"), the Building for the Future letter and the WIC flier must all be displayed in conspicuous locations. Monitors should carry a supply of posters and provide them as necessary.
  - 48. Discuss any possible civil right problems identified with the staff and include any explanations provided. If, in the opinion of the reviewer, any kind of discrimination is present, notify the sponsor's office immediately.

#### 5-DAY TEST:

49-51. The 5-Day Test is a screening tool to compare the prior days' meal counts to the meal count observed on the day of review. Record the prior consecutive 5-day meal counts. [Note: do not include days center was closed or days where no meal counts were recorded]. Using the formula, calculate the 5-day meal count average and multiply it by 85% (.85). If the resulting number is a decimal, use normal rounding procedures to round to the nearest whole number (i.e., round up if the decimal is .5 or greater; round down if the decimal is less than .5). If the number of meals served on the day of the review is less than this number, center staff will need to provide a (documented) plausible explanation. If a plausible explanation is provided, the center is considered to have "passed" the 5-Day Test. If a plausible explanation is not provided, the center is considered to have "failed" the 5-Day Test. A Corrective Action Plan is required, a Follow-Up review must be conducted, and center staff should be informed of the consequences of program fraud and abuse. If the center fails the 5-Day Test on subsequent reviews, including Follow-Up reviews, the center is subject to household contacts and/or audits that could result in termination from the program and possible pay back of significant sums of money.

### **5-DAY RECONCILIATION:**

52-53. Instructions for Five-Day Reconciliation:

- Complete the table for any five consecutive days. [Note: These can be the same 5 days as the 5-Day Test]
- Evaluate enrollment and attendance records to ensure that they are current and accurate.
- Compare the center's total enrollment to its recorded daily attendance for the five days to ensure that the number of children in attendance does not exceed the number of children enrolled.
  - If attendance does exceed enrollment for any day, the monitor must determine the source of the error (e.g., inaccurate attendance records, missing enrollment forms) before a five-day reconciliation can be completed.
- Compare the center's total daily attendance to its meal counts using five consecutive days of total meal
  counts for each approved meal type to ensure that meal counts do not exceed the number of participants
  in attendance on any day.

 If the facility review is early in the month, the monitor may need to look at meal counts from the prior month.

**Note:** If meal counts, enrollment records and attendance records cannot be reconciled, a meal disallowance or Warning Letter may be necessary.

#### **REVIEW AND SUMMARY:**

54-57. Refer to additional guidance materials provided in your sponsor oversight handbook.

Comment Section – Use this section to list and describe any issues of non-compliance noted. This section may also be used to identify any program areas that deserve commendation.

After the review is conducted and the monthly claim has been filed, the sponsor's designated Program Manager should perform a second party check of the review form. This is to ensure that it is completely and correctly filled out. The second party check should not be performed by the same person who has conducted the review.

A Corrective Action Plan (CAP) is required when significant issues of noncompliance are found during a monitoring review, including meal disallowances and failure of the 5-Day Test. The sponsor must receive a written Corrective Action Plan by the required date. Two weeks should generally be an adequate amount of time but, depending on circumstances, the reviewer may allow a slightly longer time or require a shorter time. Sponsors have the option of not requiring a CAP for deficiencies that are not systemic or process-related errors and that can be permanently fixed at the time of the review, or shortly thereafter. If a CAP is not required, the sponsor must provide technical assistance and must record all actions taken on the Site Review Form or Follow-Up Form.

Upon receipt of the CAP, the sponsor must compare the plan to the issues of noncompliance that were identified to ensure all noted issues of noncompliance were addressed. If any responses are inadequate the sponsor must Follow-Up with the center until an adequate response has been received.

A Follow-up Review must be conducted within 30 days of an approved CAP.

Sponsor Name:	
Center Name :	

# Child Adult Care Food Program CORRECTIVE ACTION PLAN

for Sponsored Centers

Site WINS ID	#
Review Date:	

Center Conta	act:	'	or sponsored Centers		CAP Due Da	te:			
Thoma #	Co	rroctive Action		Individual	lual Implementation	Approved by Sponsor			
Item #	Co	rrective Action		Responsible	Date	(√) Yes	(√) No		
Note: CAP n	nust be signed by Center Point of Co	ontact/Center Director * If add	itional signatures are need	ed, please add a	nother page.				
		0 1 5 11 6			presentative Signature				
Center Representative Signature		Center Representative Si	Center Representative Signature						
Printed Name		Printed Name		Drinted Na	Printed Name				
rillica ivallic		riintea Name		riiiteu Nai	ille				
Title	Date	Title	Date	Title		Date			
Sponsoring	Organization Use Only								
			Approv	ed Den	ied				
CACFP Resp	onsible Party	DATE							

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# CORRECTIVE ACTION PLAN (CAP) GUIDELINES

## 1) Why are CAPs needed?

- A. To ensure that Center responsible principals and individuals understand what they are doing wrong and what they need to do to make improvements.
- B. To document the center's plan for improvement and to provide an opportunity for the plan to be accepted by the sponsoring organization.
- C. To provide sufficient detail so that during future reviews a determination can be made about whether the center staff made and maintained the corrective action(s).

# 2) When are CAPs required?

Any time issues of non-compliance are found.

# 3) What information must be included in my corrective action documentation?

- A. The plan must *specifically* address *each* issue of non-compliance noted on the review form or the Notice of Serious Deficiency.
- C. Generally, CAPs should be submitted within ten (10) days of the review.

# 4) What will happen once I have submitted the CAP to my sponsoring organization?

- A. Your response will be reviewed, issue by issue, to ensure that you have provided a clear statement of <u>How</u>, <u>Who</u>, and When the issue(s) of non-compliance will be corrected.
- B. If the CAP is <u>approved</u>, the sponsoring organization monitor will verify that the CAP has been implemented. The CAP is only approved if all of the item(s) in the CAP are acceptable. For example, if only 4 out of 5 items are approved and
- C. acceptable, then the entire CAP must be <u>denied</u>. However, only the item(s) that was not approved and accepted must be resubmitted for approval.
- C. If the CAP is <u>denied</u>, you will be notified and if time remains before the CAP due date you may resubmit the CAP. If no time remains you could receive a Notice of Serious Deficiency and/or inability to renew sponsor application.
- D. If the follow-up review reveals that the CAP was not fully and permanently corrected and implemented, then a Notice of Serious Deficiency can be issued which could result in additional corrective action and monitoring.