

## Summer Food Service Program (SFSP) Desk Audit Overview for Administrative Reviews during Summer 2021

### Purpose

This document outlines the administrative review process for Summer Food Service Program (SFSP) Administrative Reviews in Summer 2021. In response to COVID-19, on August 4<sup>th</sup>, 2020 USDA released [COVID-19: Child Nutrition Response #43 Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Summer Food Service Program- EXTENSION 2](#). This waiver promotes physical distancing efforts to maintain the safety of all program operators. Instead of the typical in-person administrative review conducted by the State agency, reviews under this waiver will consist of a paperwork-based desk reviews of all sites. The State agency reviewer will ask for photographic documentation of certain aspects of program operation at selected sites.

**Please Note:** School Food Authority (SFA) Sponsors who are new to the SFSP should be aware that the SFSP Administrative Reviews are significantly less involved than the School Nutrition Program administrative reviews. Less preparation is expected, fewer areas are reviewed, and the corrective action process is generally much simpler.

### Sponsor Selection Process

Per the State agency's Monitoring Plan for Program Year 2020-2021, in Summer 2020, sponsors will be reviewed in their first year of operation and every three years.

### Sponsors to be reviewed in Summer 2021:

Addison Central School District  
Bennington-Rutland Supervisory Union  
Boys & Girls Club of Rutland County  
Green Mountain Farm to School  
New Hope Bible Church & Ministries, Inc.  
OCCC, Inc.  
Snowlake Retreat Corporation

### Administrative Review Notice Process

Sponsors will receive an email from Jamie Curley requesting documentation for a certain time period.

If Sponsors have not completed the Site Review by the time of their review, the Sponsors will submit a copy of the review form as soon as it is completed.

### Contact Information:

If you have questions about this document or would like additional information, please contact:  
Jamie Curley, Child Nutrition Programs, at [jamie.curley@vermont.gov](mailto:jamie.curley@vermont.gov) or 802-828-2010

Review documents will be due the Monday of the selected review week and a phone call to discuss materials will be scheduled for the end of that week.

## **Phone Call Overview**

Sponsor representatives must be present for the phone call scheduled with the SFSP reviewer, Jamie Curley. Sponsors should have all SFSP materials handy during the phone call as the reviewer will be going over questions and requesting corrective action regarding the materials submitted. The phone call will begin with reviewing any questions about materials submitted, including any discrepancies found in meal counts or other issues that may qualify as findings related to the review. Any questions that are unanswered will be followed up on and Sponsors are expected to answer questions in a timely manner. The phone call will end with the reviewer assigning a date for corrective action to be due, as well as an overview of what corrective action was requested. The reviewer will send a follow-up e-mail after the phone call including what technical assistance was provided during the call, what corrective action was requested, additional documents requested for review, any outstanding questions, and a deadline for submission of these documents and corrective action.

## **Site-Level Review**

Typically, this portion of the site review consists of an on-site meal service observation. During Summer 2021, this will consist of assessing additional documentation for the site. The Sponsor will be required to submit pictures of meal service and a description of the meal service procedure for one of the meal services offered.

## **Paperwork Reviewed**

Paperwork is reviewed at the Sponsor-level and additional paperwork is reviewed at the site-level. If the production kitchen is separate from the site, and/or if the site being reviewed does not prepare meals on-site, additional documentation will be requested for the production kitchen.

The most preferable method of submitting the paperwork is via SharePoint folder. Any paperwork containing personally identifiable information, such as free and reduced-price meal applications, must be uploaded to the SharePoint folder. Prior to the scheduled review, an email will be sent to the sponsor from the Reviewer including the SharePoint folder link where sponsors will submit the required SFSP documentation. The review documents are to be submitted in an organized manner and all document files should be named appropriately. Sponsors should submit documents, such as meal count sheets, in chronological order.

Below outlines the paperwork that will be required to be submitted for review.

### **Sponsor-Level:**

- Inventory, including value, of food and non-food supplies as of the beginning of the program
- One week's menu, does not have to be an "official" calendar menu, production records, if these are the method of meal pattern documentation, and/or

invoices/receipts/documentation of food costs for the same week, recipes, any applicable CN-Labels and Product Formulation Statements

- Daily Meal Count sheets and accompanying started Monthly Consolidated Meal Count Sheet for one week of operation
- One week of delivery receipts for vended sites
- Media release and documentation that it was distributed, published, or posted publicly
- Pre-Operational Review Form(s) and First Week Review Form(s) (if applicable)
- Site Review Form
- Documentation of staff training, including Summer Meals training and Civil Rights training
- Employee time attributed to the program, including hourly rates such as paystubs
- Relevant procurement documents, including Procurement Procedures – must include Codes of Conduct and Conflicts of Interest policy.
- Information provided with meals when parents/guardians may pick up the meals on the child’s behalf/any food safety information has to be communicated to households/any bulk meal information has to be communicated to households
- Picture of the JFA poster at the Sponsor’s office, such as the central office
- Civil Rights Complaint Procedure
- Racial and Ethnic Data Form

**Site-Level:**

- Picture of JFA poster posted to be publicly visible, such as main office or main entrance
- Copy of most recent Health Inspection Report (if applicable) and picture to show it is posted to be publicly visible
- Pictures of the insides of the walk-in refrigerator and freezer or other cold storage
- Copies of cold storage, dishwasher, and food temperature logs for one week of operation
- Pictures of meal service set-up – pictures do not need to include children; if they do include children, do not include their faces
- Description of meal service for selected meal service (breakfast or lunch), including meal counting procedure and food safety and sanitation measures
- For residential and non-residential camp sites, free and reduced-price meal applications

**Production Kitchen Specific:** If production kitchen is separate from the site.

- Picture of the JFA poster posted to be publicly visible, such as main office or main entrance
- Copy of most recent Health Inspection Report (if applicable) and picture to show it is posted to be publicly visible
- Picture of the insides of the walk-in refrigerator and freezer or other cold storage
- Copies of cold storage, dishwasher, and food temperature logs for one week of operation

**Financial and Civil Rights Questions**

Submit a copy of the answers to the questions below.

**Financial Questions:**

1. Does the Sponsor charge indirect costs?  Yes  No  
If yes, was this process done correctly?  Yes  No  N/A
2. Does the Sponsor receive more than 750,000 in total federal financial assistance?  
 Yes  No  
If yes, did the Sponsor meet the audit requirement?  Yes  No  N/A  
If yes, were there any SFSP-related audit recommendations?  Yes  No  N/A  
If yes, were any of those not implemented?  Yes  No  N/A

### Civil Rights Questions:

1. Does the Sponsor have the need for providing materials regarding the availability and nutritional benefits of the program in other languages?  Yes  No If yes, do they have the capability to translate the materials?  Yes  No  N/A
2. Does the Sponsor have a written procedure for handling complaints of discrimination?  Yes  No
3. Has the Sponsor completed the Racial and Ethnic Data Form for all sites and, if applicable, each camp session?  Yes  No
4. Does the Sponsor maintain all program records for three years, plus the current year?  Yes  No
5. Does the Sponsor have the complete non-discrimination statement on the program webpage?
6. Are there any procedures, or anything in the way you implement or operate the program, which restrict or deny participation on the basis of the protected classes? USDA FNS protected bases include race, color, sex, age, disability, national origin. Vermont Agency of Education protected bases include all USDA FNS protected bases and religion, sexual orientation, gender identity, marital/civil union status.  Yes  No
7. Does the Sponsor allow equal access to the program, regardless of race, color, national origin, sex, age or disability? (Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in program or activity that receives federal funds or other federal financial assistance).  Yes  No
8. Were there any modifications, including meal modifications, to accommodate disabilities?  Yes  No

### Review Forms

At the conclusion of the review, copies of the completed review forms will be provided to the Sponsors via SharePoint to sign. Review forms include:

- Sponsor Level Administrative Review Form Summer 2021
- Site Level Administrative Review Form Summer 2021
- Production Kitchen Review Form Summer 2021 (if applicable)
- Procurement Review Form Summer 2021

## **Review Report and Corrective Action**

Once the reviewer has assessed the submitted documentation and asked any necessary follow-up questions, a written review report detailing findings and the necessary corrective actions needed will be provided to Sponsors via email. Sponsors will have two weeks to address the required corrective action and submit documentation to verify it has been implemented. Sponsors may request extensions for any findings except health and safety-related findings, which must be addressed immediately.

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