

Summer Food Service Program (SFSP) Desk Audit Overview for Administrative Reviews during Summer 2020

Purpose

This document outlines the administrative review process that Summer Food Service Program (SFSP) Sponsors selected for review in Summer 2020 can expect. In response to COVID-19, on March 26th, 2020 the USDA granted a nationwide waiver of the on-site requirement for State agency monitoring found in 7 CFR 225.15(d)(2)(ii), through June 30th, 2020. On June 8th, 2020 USDA released [COVID-19: Child Nutrition Response #31 Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Summer Food Service Program- EXTENSION](#) which extends the waiver until August 31st, 2020. This waiver promotes social 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 7 CFR 225.7(d)(2), Sponsors will be reviewed on the following criteria:

- Sponsors with significant problems in the previous summer will be reviewed;
- New Sponsors in their first year of operation will be reviewed;
- Sponsors will be reviewed at least once every three years.

The State agency is required to review enough Sponsors to equal 50% of the State's total reimbursement in the previous summer. The State agency submitted a waiver of the SFSP requirement 7 CFR 225.7(d)(2)(ii)(B) that State agencies shall annually review a number of Sponsors whose program reimbursements, in the aggregate, accounted for at least one-half of the total program meal reimbursements in the State in the prior year to reduce the administrative burden on the State agency and the Sponsors. As of June 26, 2020, we have not heard from the USDA about the status of this waiver, however we are moving forward with a review schedule which assumes this waiver will be granted.

Sponsors to be reviewed in Summer 2020:

Selected sites may be subject to change.

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 or 802-828-2010

Returning Sponsors and Selected Sites

Boys and Girls Club of Greater Vergennes- Boys and Girls Club of Greater Vergennes
Burlington School District – Burlington High School, Hunt Middle School, Riverside
Neighborhood
Caledonia Central Supervisory Union- Danville School
Central Vermont Supervisory Union- Northfield Elementary School
Coutts-Moriarty Camp, Inc. – Coutts-Moriarty Day Camp
Grand Isle Supervisory Union- Grand Isle School
Greater Rutland County Supervisory Union- West Rutland Elementary School
Milton Town School District- Milton Elementary School
Mt. Abraham Unified School District – Mt. Abraham Middle/High School
Northeastern Family Institute- Turning Points School
Northeastern Vermont Regional Hospital- Cornerstone School
Northwoods Stewardship Center- Old Stone House Museum
Orange East Supervisory Union- Bradford Elementary School
Rutland City School District- Rutland Intermediate/Middle School, BROCC
Two Rivers Supervisory Union- West Hill Dam
White River Valley Supervisory Union- Bethel Elementary School
Windham Central Supervisory Union- Leland & Gray High School
Windsor Southeast Supervisory Union- Windsor Common

New Sponsors and Selected Sites

Burr and Burton Academy- Food Truck Orvis
Champlain Valley UUSD- Williston Central School
Franklin West SU- Georgia Elementary & Middle School
Hartford School District- Hartford High School, Vins Summer Camp
Kingdom East Supervisory District- Lyndon Town School
Mill River Unified School District- Mill River Union High School
Montpelier Roxbury Supervisory Union- Union Elementary School
Mount Mansfield UUSD- Camel's Hump Middle School
Slate Valley Modified UUSD- Fair Haven Grade School
South Burlington Town School District- F.H. Tuttle Middle School
Washington County Mental Health Services, Inc.- Choice Academy

Administrative Review Notice Process

The list of Sponsors to be reviewed will be posted on the Child Nutrition Programs webpage. In the second week of July, Sponsors will receive an email from Jamie Curley requesting documentation for a certain time period.

For Sponsors that operated the SFSP during the Unanticipated School Closure due to COVID-19, one month of meal counts, for all sites, will be assessed from the months of April 2020, May 2020, or June 2020, as well as one week from July 2020. For Sponsors that did not operate during the Unanticipated School Closure, meal counts will be assessed for the month of July 2020.

If Sponsors have not completed all Site Reviews by the time of their review, the Sponsors will submit copies of the review forms as soon as they are completed.

Review documents will be due on the days included in the email and a phone call to discuss

materials will be scheduled for approximately 2-3 days after. 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 and clearly indicate the appropriate site.

The State agency understands the unique difficulties presented by operating during COVID-19. If the Sponsor has difficulty complying with the timeline requested by the State agency, please contact the reviewer, and the reviewer will work with the Sponsor to adjust the timeline accordingly, if possible.

Phone Call Overview

Sponsor representatives must be present for the phone call scheduled with the SFSP reviewers, Jamie Curley and Anastasia Tsekeris. Sponsors should have all SFSP materials handy during the phone call as the reviewers 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. Sponsors will also be asked questions regarding civil rights and finances of the organization. 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 reviewers assigning a date for corrective action to be due, as well as an overview of what corrective action was requested. The reviewers 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 Selection Process

7CFR 225.7(d)(2)(ii)(E), (E) requires each Sponsor review to include site reviews of at least 10 percent of the Sponsor's sites, or one site, whichever number is greater. For Sponsors with 10 or less sites, one site will be reviewed, for Sponsors with 11-20 sites, two sites will be reviewed, and for Sponsors with 21-30 sites, three sites will be reviewed. Sites will be selected based on several factors including: the last time they were reviewed; if they experienced significant problems in the previous summer; site type; and number of children served last year/anticipated to be served this year. Typically, this portion of the site review consists of an on-site meal service observation. During Summer 2020, this will consist of assessing additional documentation for the selected site(s). 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 for all sites participating under the Sponsor during an administrative review. Additional paperwork is reviewed for the selected site(s). If the production kitchen is separate from the sites, and/or if the site being reviewed does not prepare meals on-site, additional documentation will be requested for the production kitchen. If paperwork is to be submitted via Google Drive, it must be made public. This means any paperwork with personally identifiable information, such as student free and reduced status, should not be included in the publicly accessible Google Drive. This information must be sent via a secure

email. To rest a secure email, please contact Jamie Curley, Jamie.curley@vermont.gov. Below outlines the paperwork that will be required to be submitted for review.

For All Sites:

- Inventory, including value, of food and non-food supplies as of July 1st
- Site eligibility documentation (such as free and reduced-price meal applications, if applicable). This is not applicable for any open sites or closed enrolled sites this year, due to the area-eligibility waiver.
- 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 invoices/receipts/documentation of food costs for the same week
- For sponsors that operated during Unanticipated School Closure operation, Daily Meal Count Sheets and accompanying Monthly Consolidated Meal Count Sheet for the month of April 2020, May 2020, or June 2020, and one week of Daily Meal Count sheets from after July 1
- For sponsors that did not operate during Unanticipated School Closure operation, Daily Meal Count sheets and accompanying Monthly Consolidated Meal Count Sheet for the month of July 2020
- 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) (if applicable)
- First Week Review Form(s) (if applicable)
- Site Review/"4 week" Review Form(s)
- Documentation of staff training, including Civil Rights training and required VOSHA COVID Workplace 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. If your organization does not have these included in their Procurement Procedures, contact Anastasia Tsekeris at Anastasia.tsekeris@vermont.gov for the proper language to include.
- *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 *this is new in Summer 2020
- Picture of the JFA poster at the Sponsor's office, such as SFA central office
- Civil Rights Complaint Procedure
- Racial and Ethnic Data form

Selected Site(s) Specific:

- Picture of JFA poster posted to be publicly visible
- 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
- Meal service description for selected meal service, including meal counting procedure and food safety and sanitation measures

Production Kitchen Specific:

- Picture of the JFA poster posted to be publicly visible
- Copy of most recent Health Inspection Report (if applicable) and picture to show it is posted to be publicly visible
- Pictures of production kitchen staff wearing masks during preparation
- 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

Review Forms

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

- Sponsor Level Administrative Review Form Summer 2020
- Site Level Administrative Review Form Summer 2020
- Production Kitchen Review Form Summer 2020
- Procurement Review Form

Review Report and Corrective Action

Once the reviewers have 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 one week 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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