



Monitoring Requirements of Sponsors Participating in the Summer Food Service Program, SFSP #16 (06-16)

LEGAL AUTHORITY

O.C.G.A §20-1A-5 , 7 CFR §225.15(d)

Cross Reference/See Also

SFSP/04-15

I. PURPOSE

The purpose of this policy is to state and briefly discuss monitoring requirements of sponsors participating in the Summer Food Service Program (SFSP).

II. APPLIES TO

This policy applies to all sponsors participating in SFSP.

III. DEFINITIONS

"Conditional non-congregate site" means a site which qualifies for Program participation because it conducts a non-congregate meal service for eligible children in an area that does not meet the definition of "areas in which poor economic conditions exist" and is not a "Camp".

"Congregate meal service" means a food service at which meals that are provided to children are consumed on site in a supervised setting.

"Experienced site" means a site which, as determined by the State agency, has successfully participated in the Program in the prior year.

"New site" means a site which did not participate in the Program in the prior year, an experienced site that is proposing to operate a non-congregate meal service for the first time, or, as determined by the State agency, a site which has experienced significant staff turnover from the prior year.

"Non-congregate meal service" means a food service at which meals are provided for children to consume all of the components off site. Non-congregate meal service must only be operated at sites designated as "Rural" with no "Congregate meal service," as determined in 7 CFR 225.6(h)(3) and (4).

"Pre-operational visit" means visits that must be performed for all new and problem sites before they begin Program operations.

"Problem site" refers to a site that has had significant findings or problems in the operation of the SFSP in the past.

"Site" means the place where a child receives a program meal. A site may be the indoor or outdoor location where congregate meals are served, a stop on a delivery route of a mobile congregate meal service, or the distribution location or route for a non-congregate meal service. However, a child's residence is not considered a non-congregate meal site for Program monitoring purposes.

"Site Review" (review) means an observation of program operations usually by a monitor or a sponsor's staff to determine if the site is meeting all of the various program requirements. This includes, but is not limited to, observing a complete meal service for beginning to end including delivery/preparation of the meal, the meal service, and clean up after the meal service.

"Site Visit" (visit) means an observation of program operations including the meal service usually by a monitor or a sponsor's staff to ensure that the food service is operating smoothly and that any apparent problems are immediately resolved. However, although the monitor or staff member is required to conduct the site visit during a meal service, the monitor or staff member is not required to observe the meal service from the beginning to end. These visits should not be confused with the pre-operational visit.

"Sponsor" means a public or private nonprofit school food authority, a public or private nonprofit residential summer camp, a unit of local, municipal, county or state government, a public or private nonprofit college or university currently participating in the NYSP, or a private nonprofit organization which develops a special summer or other school vacation program providing food service similar to that made available to children during the school year under the National School Lunch and School Breakfast Programs and which is approved to participate in the Program. Sponsors are referred to in the Act as "service institutions."

IV. POLICY

Sponsors must conduct pre-operational visits for new sites, sites that experienced operational programs the previous year, and existing sites that are new to non-congregate meal service to determine that the sites have the capacity to provide meal service for the anticipated number of children in attendance and the capability to conduct the proposed meal service. In addition, sponsors must visit each of their sites at least once during the first two weeks of Program operations and must take actions as are necessary to correct any deficiencies. In cases where the site operates for seven calendar days or fewer, the visit

must be conducted during the period of operation. Sponsors must conduct these visits at the following sites:

- All new sites;
- All existing sites that are new to providing non-congregate meal service;
- All sites that have been determined by the sponsor to need a visit based on criteria established by the State agency pertaining to operational problems noted in the prior year; and
- Any other sites that the State agency has determined need a visit.

Criteria for Determining Operational Problems

As per 7 CFR 225.7(o), DECAL has established criteria that sponsors must use to determine if a site would require a visit within the first two weeks of operation. Sites where the following issues were found during sponsor visits or reviews or DECAL reviews in the prior year, must receive a visit during the first two weeks of operation:

- Meal preparation deficiencies;
- Meal service deficiencies such as not serving all required components or the required quantities;
- Food safety issues;
- Meal counts not being conducted at point of service;
- Repeated instances of missing or incomplete meal count records;
- Failure to properly notify the sponsor of the need to adjust meal orders;
- Inflated meal counts;
- Repeated instances of off-site meal consumption at congregate meal service sites;
- Repeated instances of meals being served outside of approved meal times;
- Meals repeatedly claimed that exceed the site's meal max;
- Offer versus Serve (OVS) requirements repeatedly not met (use of OVS is limited to SFA sponsors only);
- Civil rights violations such as separating children or services by age, sex, disability, race, color, or national origin;
- Site was found not to operate as required based on approved site type (ex. site is approved as an open site, but is not open to the public at large);
- Site was found to not operate with a food inspection when required; and
- Site failed to adhere to rural non-congregate meal service requirements to include the misuse of the parent/guardian pick up, multi-day distribution, and bulk meal distribution meal service options.

Sponsors should note that the conducting of site visits during the first two weeks of operation does not have to be limited to only those sites that had operational problems during the prior year. A best practice would be to conduct site visits at all sites during the first two weeks of operation as conducting site visits during the first two weeks of operation helps to ensure that SFSP sponsors are aware of operational and administrative problems at sites at the beginning of the Program. This would enable a

sponsor to take necessary actions to correct the problems before they result in one or more serious deficiencies. However, if a site did not have operational problems the prior year, it would be at the discretion of the sponsor as to whether that site will be visited. Though, sponsors, if not conducting visits at all sites, are encouraged to develop criteria for determining when to visit sites that are not new, not new to operating non-congregate meal services, or did not have operational problems during the prior year. For example, the sponsor, site staff, and meal service participants would all benefit from a visit taking place during the first two weeks when there has been a change in site supervisor from the prior year.

Sponsors must also conduct a full review of food service operations at each site at least once during the first four (4) weeks of Program operations, and thereafter must maintain a reasonable level of site monitoring. Sponsors must complete the monitoring form required by DECAL to record the visit. A reasonable level means that sponsors are required to visit and/or review sites they suspect are not effectively operating the Program or that has been cited in past reviews for not effectively operating the Program. If problems are found at the sites, immediate action must be taken to correct and prevent all problems. Sponsors must complete the monitoring forms required by DECAL to record the monitoring visits. The full review of food service operations may be completed at the same time as the site visit during the first two weeks of operation.

A full site review of meal service for non-congregate sites may look different than a full site review of a congregate meal service, depending on the meal service delivery method used. A full site review of a non-congregate site includes reviewing the entire meal service time, which is the time established by the sponsor for a site to distribute meals.

For example, with home delivery, a full meal service review may include observing the meals being loaded into delivery vehicles, checking meal logs and delivery routes, and additional items outlined by the State agency. The sponsor must also ride along with or follow the delivery driver along the distribution route to observe the meal delivery.

In the instance of a meal pickup model, such as grab-and-go, meal service review may also include observing the self-preparation of meals. In all non-congregate services, the sponsor must ensure eligible children are receiving the proper number of meals that meet nutritional standards and are consistent with all applicable State and local health, safety, and sanitation standards.

Please keep in mind that conditional rural non-congregate sites are subject to monitoring requirements, as well as, congregate and rural non-congregate sites. Assessing if the conditional non-congregate site has documentation to support Program eligibility per child, either based upon income standards (IES forms) or school data, is a review requirement during the full site review.

Sponsors are required to follow-up on findings found in previous reviews and inspections conducted by USDA, DECAL, and the health department, respectively, and document the process and/or procedures used to correct the findings. Sponsors must ensure that monitoring is continued during the summer at a level sufficient to ensure that each site comply with program regulations. Sponsors must also develop and submit a monitoring policy within their management plan to DECAL. The monitoring policy should include a detailed description of the procedures that will be used to conduct site visits, reviews, and follow-ups.

Sponsors cited by DECAL for Program violations at a significant number of the sponsor's sites that were not previously found and documented by the sponsor during their reviews will be declared seriously deficient or cited for failure to conduct sufficient monitoring of its sites. In addition, DECAL will require Sponsors to perform one or more of the following:

- Conduct only full site reviews at its sites instead of site visits;
- Submit corrective action detailing processes and/or procedures that will prevent future monitoring findings; and/or
- Modify the sponsor's current monitoring schedule.

V. PROCEDURES

During the application process, DECAL will provide each sponsor with a Monitoring Policy Checklist, which will serve as a guide in the development of each sponsor's monitoring policy.

Sponsors are required to visit all new sites, sites that experienced operational programs the previous year, and existing sites that are new to non-congregate meal service. In addition, sponsors must conduct a visit during the first two weeks of a site's operation for all new sites, all existing sites that are new to providing non-congregate meal service, all sites that have been determined by the sponsor to need a visit based on criteria established by the State agency pertaining to operational problems noted in the prior year, and any other sites that the State agency has determined need a visit.

Sponsors are encouraged though not required to visit all sites during the first two weeks of operation or to develop criteria in determining which sites would require a visit that are not new, not new to non-congregate meal services, or did not have operational problems the prior year. A full review of food service operations at each site at least once during the first four (4) weeks of Program operations must be conducted, and thereafter the sponsor must maintain a reasonable level of site monitoring.

Sponsors are required to document visits using the following DECAL approved forms:

- [Pre-Operational Visit Form \(Attachment L-1\)](#)
- [Site Visit Form \(Attachment L-2\)](#)
- [Site Review Form \(Attachment L-3\)](#)
- [Optional Combined Site Visit and Review Form \(Attachment L-4\)](#)

During the sponsor's participation in the Program, DECAL will review and compare all of the sponsor's monitoring forms to determine if adequate monitoring is being conducted. Adequate monitoring is considered a combination of a complete, thorough visit, review, and follow-up. Adequate monitoring includes, but is not limited to, detecting problems, detailing the findings in writing, and actively working with the site to correct current findings and prevent future findings. Adequate monitoring also requires the sponsor to review all completed and submitted monitoring records to detect errors and trends in findings, as well as to proactively address site monitoring, staffing, and operating concerns or issues.

Examples of Inadequate Site Monitoring:

- Sponsor fails to conduct and/or document its required visits and/or reviews;

- Sponsor fails to conduct all of its required visits and/or reviews within the time period which were outlined in the Sponsor's approved monitoring policy;
- Sponsor fails to thoroughly review submitted monitoring records;
- Sponsor fails to detect monitoring deficiencies;
- Sponsor fails to adequately train monitoring staff;
- Sponsor fails to document findings at sites for which DECAL found substantial findings during site reviews;
- Sponsor fails to take corrective action to correct and prevent Program findings;
- Sponsor fails to conduct follow-up visits of sites with noted deficiencies; and
- Sponsor fails to terminate sites that have been identified as having immediate health or safety threats.

If DECAL determines that a sponsor is not sufficiently monitoring its sites, DECAL will declare the sponsor seriously deficient in the operation of the SFSP and on a case-by-case basis, will require the sponsor to modify their monitoring schedule and perform only site reviews of its sponsored sites.

VI. COMMENTS

Any questions concerning this policy should be directed to the Policy Administrator at (404) 651-8193.