



Monitoring Your Summer Food Service Program Operation

Topics

- Summer Food Service Program (SFSP) Monitoring Requirements
- Best Practices
- Training Monitoring Staff
- Preparing for State Agency Reviews
- Resources for Monitors

SFSP Monitoring Requirements

- Site Selection/ Pre-Op
- Site Visits
- Site Reviews
- Corrective Action
- Follow- Ups



Site Selection/ Pre-Op

(Must be completed prior to site's SFSP operation)

- *Use the Site Selection/Pre-op Visit form to document.*

Assess the following:

- The site's location.
- Type of site.
- Estimated number of children to be served.
- The site's overall ability to serve meals.

Site Visits

(Must be completed during the site's first week of operation)

- *Use the Site Visit form to document.*

Purpose of the visit is to:

- Ensure the food service operation is running smoothly.
- To verify information such as the site address, storage, holding and preparation facilities.
- To verify serving capacity.

Site Visit Exemptions

- USDA Memo date 4/5/11 waives the requirement for the following:
 - Returning sites that operated successfully during the previous summer.
 - Sites that had no serious deficiency findings.

Site Visit Exemptions (cont.)

- All new Sponsors are required to complete a site visit for all sites, regardless of previous year's operation.
- Memo is only applicable to returning Sponsors who have the same sites that operated successfully.

Site Reviews

(Must be completed within the site's first four weeks of operations)

- *Use the Site Review form to document.*

Used to observe the following:

- Delivery or preparation of meals.
- Service of meals and point-of-service meal count.
- Children eating the meals.
- Clean-up after meal service.

Site Reviews (cont.)

- If a site operates less than four weeks, the site review still must be completed.
 - Examples-
 - Site is scheduled to operate only 2-3 weeks- the site review must be completed during the site's 2-3 week operation.
 - Site is scheduled to operate only 1 week- the site review must be completed during the site's week of operation.
 - *In this example the Site Visit and Site Review must be completed on separate days.

Corrective Action

(Required when a site is non-compliant)

- Examples of non-compliance:
 - Incomplete records-
 - Delivery receipts
 - Daily meal count forms.
 - No point-of-service meal count.
 - Serving food outside of safe temperature.
 - Not serving meals as a complete unit.

Corrective Action (cont.)

- Monitors must provide guidance and/or retrain site staff when an area(s) of non-compliance are identified.
- Corrective action must outline-
 - How the site will become compliant.
 - Who will be responsible for executing the corrective action.
 - When the corrective action will be implemented.
- The corrective action must be documented on the appropriate monitoring form.

Follow-Up Reviews

(Used to ensure corrective action(s) are implemented)

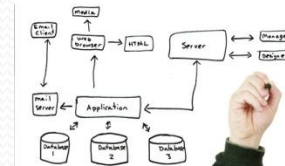
- Technical assistance or additional training has to be provided if the corrective actions(s) have not been implemented.
- Follow-ups must be documented on the appropriate monitoring form.
- Follow-ups should be completed within 5 days from the date of the noted deficiency.

SFSP Monitoring Requirements

- Monitors are responsible for completing all site pre-ops, visits, reviews, and follow-ups.
- The organization's authorized representative may designate other administrative staff to fulfill site monitoring requirements, if the Monitor is not available.

Best Practices for Monitoring

- Sponsors should create a monitoring schedule for each site.
- Timeline of schedule should be based on each sites beginning and ending dates of operation.
- Each Monitor should receive their assigned schedule prior to SFSP operation.



Best Practices for Monitoring (cont.)

- Sponsors should review all monitoring documentation as it is submitted to ensure accuracy.
- Retrain Monitors or provide technical assistance if:
 - Monitoring documentation is incomplete or inconsistent.
 - Site visits or reviews are not completed as required.

Training Monitoring Staff

- Monitors have to be trained prior to SFSP operation and/or prior to being given any monitoring assignment.
- The training agenda(s) and sign-in sheet(s) must be kept on file.
- Provide a “make-up” training date if needed.



Training Monitoring Staff (cont.)

Give a general overview of the program:

- Purpose of the SFSP.
- Eligibility of sites.
- Site record-keeping requirements.
- Necessity for maintaining accurate records-
 - Monitor
 - Sites
- Any organized site activity.
- Meal pattern requirements.
- Civil Rights compliance.

Training Monitoring Staff (cont.)

Explain how the program will operate:

- How meals will be delivered and/or prepared.
- If applicable, provide a meal delivery schedule.
- Discuss approved meal service times for each site.
- Discuss the required monitoring timeline for sites visits and site reviews.
- Discuss the required monitoring forms that must be completed.

Training Monitoring Staff (cont.)

Outline specific review requirements of Monitors:

- Completing site visits and reviews.
- Sites for which they are responsible.
- Monitoring schedule.
- Reporting/recordkeeping procedures.
- Follow-up procedure.
- Office procedures(submission of records and/or documents to the Sponsor).
- Assessing Civil Rights compliance.
- Local sanitation/health laws.
- Reporting racial/ethnic data.

Training Monitoring Staff (cont.)

Outline the Monitor's Responsibilities:

- Give each Monitor a copy of the Monitor's Guide.
- Overseer of sites.
- Responsible for completing timely and accurate site visits and reviews.
- Required to administer corrective action for non-compliance at sites.
- Complete accurate mileage and/or labor cost documentation.

Training Monitoring Staff (cont.)

Outline the Monitor's Responsibilities (cont.):

- Areas of assignment
 - Number of sites that he/she will oversee.
 - Location of sites.
- If possible, introduce to Site Supervisors
 - Exchange contact information with Site Supervisor.

State Agency Reviews

Regulatory Requirements as it Relates
to the State Agency

Pre-Approval Visits Requirements

- All **sponsors that did not participate** in the Program in the prior year [225.7(d)(1)(i)];
 - **Exception: Discretion of the State Agency:**
 - Visits not required for School Food Authority (SFA) reviewed by the National School Lunch Program (NSLP) during the preceding 12 month, and had no significant deficiencies.
 - Sponsors proposing to operate the Program during unanticipated school closures during the period from October through April (or at any time of the year in an area with a continuous school calendar).
- All **applicant sponsors** which, as a result of **operational problems noted in the prior year**, the State Agency has determined need a pre-approval visit [225.7(d)(1)(ii)] ; and
- All **sites** in which the State agency has **determined need** a pre-approval visit [225.7(d)(1)(iii)].

Sponsor Reviews

- SFSP regulations 7 CFR 225.7(d)(2)
 - State agencies must review sponsors and sites to ensure compliance with Program regulations, the Department's non-discrimination regulations (7 CFR Part 15) and any other applicable instructions issued by the Department.

Sponsor Reviews (cont.)

- Which Sponsors should be reviewed?
- At a minimum, states should consider the following:
 - Previous participation
 - Current and previous Program performance
 - Exceptions:
 - States are not required to conduct a review when SFA's with the same personnel that administer both NSLP and SFSP in the same year where the NSLP has conducted a satisfactory review.

Frequency of Sponsor Reviews

- SFSP regulations 7 CFR 225.7 (d)(2)(ii):
 - Review every new sponsor at least once during the first year of operation;
 - Review each year, a number of sponsors whose program reimbursements, in the aggregate, accounted for at least one-half of the total program meal reimbursements in the Start in the prior year;
 - Review each year every sponsor which experienced significant operations problems in the prior year;
 - Review each sponsor at least once every three (3) years.

Site Reviews

- SFSP regulations 7 CFR 225.7(d)(2)(ii)(E):
 - As part of each sponsor review, conduct reviews of at least 10 percent of each sponsor's sites or one site, whichever number is greater.

Follow Up Reviews

- SFSP regulations 7 CFR 225.7(d)(3):
 - The state agency shall conduct follow up reviews of sponsors or sites as necessary.

Food Service Management Company Reviews

- SFSP Regulations 7 CFR 225.7(d)(6):
 - As part of the review of any vended sponsor which contracts for preparation of meals, the State agency shall inspect the food service management company's facilities.

Complaint Investigations

- SFSP regulations 7 CFR 225.11 (b):
 - Each State agency shall promptly investigate complaints received or irregularities noted in connection with the operation of the Program, and shall take appropriate action to correct any irregularities.
 - The State shall maintain on file all evidence relating to such investigations and actions.
 - State shall notify the appropriate FNSRO or any suspected fraud or criminal abuse in the Program which would result in a loss or misuse of Federal funds.

Internal/External Audits

- **Internal: Agreed Upon Procedure Reviews**

- Reviews assigned by BFTS and performed by external auditing firm.
- Evaluates/assesses Program performance (operational and administrative functions) and financial management system.
- Procedures are developed by BFTS and based on Program regulations and policies.

- **External: A-133 Audits**

- Required for organizations that receive or expend \$500,000 or more in federal funds.
- Reviews/assess financial management systems.

Agreed Upon Procedures Reviews

- Developed by the State Agency
- AUP Components include all of the state agency review components, and the following:
 - Comparison analysis of previous review findings and accepted corrective action.
 - In depth analysis of the institution's compliance with required Performance Standards (financial viability, capability and accountability (VCA)).

Agreed Upon Procedures Reviews

- Verification of VCA Compliance
 - Analysis of financial management system
 - Compliance with FNS Instructions, CACFP policies, and procedures, audit regulations 3052
 - Accounting systems
 - Costs allocations
 - Analysis of Program Accountability
 - Distribution of labor
 - Consistency with Management Plan and Compensation Plan
 - Present and enforced internal controls

How Sponsors Should Prepare for State Agency Reviews:

- As monitoring records are submitted, review them to ensure they are being completed with accuracy:
 - Provide Monitors with technical assistance if records are not being completed with accuracy.
- Records have to be available at all times for review:
 - Reviews are unannounced.
 - Sponsors must have staff who are available to provide access to SFSP records at all times.



How Sponsors Should Prepare for State Agency Reviews:

- Have all of the required SFSP records and forms on file.
- Make sure that all SFSP records are organized and labeled in folders or in binders.



Resources for Monitors

- FY 2011 SFSP data CD-
 - Monitor's Guide
 - Site Selection/Pre-op form (*attachment L-1*)
 - Site Visit form (*attachment L-2*)
 - Site Review forms (*attachments 33 & 34*)
 - Mileage (*attachment 23*)
 - Labor Cost Document (*attachment 25*)
- All SFSP forms and guidance are also available online at: www.decal.ga.gov

Questions or Concerns!

Contact Nutrition Services
at 404-651-7191.