



**Georgia Dept
of Early Care
and Learning**

Origination 1/8/2025

Effective 1/8/2025

Last Revised 1/8/2025

Area **Memo:**
Monitoring
Programs **SFSP**

State Agency Monitoring Requirements in the Summer Food Service Program (SFSP) #21 (24-21)

I. LEGAL AUTHORITY

7 CFR § 225.7; 7 CFR § 225.11

II. PURPOSE

The purpose of this policy is to explain and clarify State Agencies' monitoring requirements under the Summer Food Service Program (SFSP).

III. APPLIES TO

This policy applies to all institutions participating in the SFSP.

IV. DEFINITIONS

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

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

"FNS" means the Food and Nutrition Service of the Department

"FNSRO" means the appropriate FNS Regional Office.

"Food service management company" means any commercial enterprise or nonprofit organization with which a sponsor may contract for preparing unitized meals, with or without milk, for use in the Program, or for managing a sponsor's food service operations in accordance with the limitations set forth in [§ 225.15](#). Food service management companies may be: (a) Public agencies or entities; (b) private, nonprofit organizations; or (c) private, for-profit companies.

"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.

"New sponsor" means a sponsor which did not participate in the Program in the prior year, or, as determined by the State agency, a sponsor which has experienced significant staff turnover from the prior year.

"School food authority (SFA)" means the governing body which is responsible for the administration of one or more schools and which has the legal authority to operate a lunch program in those schools. In addition, for the purpose of determining the applicability of food service management company registration and bid procedure requirements, "school food authority" also means any college or university which participates in the Program.

"Self-preparation site" means a site that prepares the majority of meals that will be served at its site or receives meals that are prepared at its sponsor's central kitchen. The site does not contract with a food service management company for unitized meals, with or without milk, or for management services.

"Self-preparation sponsor" means a sponsor which prepares the meals that will be served at its site(s) and does not contract with a food service management company for unitized meals, with or without milk, or for management services.

"Site supervisor" means the individual who has been trained by the sponsor and is responsible for all administrative and management activities at the site, including, but not limited to: maintaining documentation of meal deliveries, ensuring that all meals served are safe, and maintaining accurate point of service meal counts. Except for non-congregate meal service sites using delivery services, the individual is on site for the duration of the food service.

"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".

"Vended sponsor" means a sponsor which purchases from a food service management company the unitized meals, with or without milk, which it will serve at its site(s), or a sponsor which purchases management services, subject to the limitations set forth in [§ 225.15](#), from a food service management company.

V. POLICY

State agencies must review sponsors and sites to ensure compliance with Program regulations, USDA's non-discrimination regulations, and any other applicable instructions issued by the USDA. Monitoring is an essential part of Program oversight and State agency responsibilities. Monitoring by State agencies helps to identify and prevent management deficiencies, fraud, and abuse, and improve SFSP operations.

Reviews include pre-approval visits, sponsor and site reviews, reviews of food service management companies, follow-up reviews, serious deficiency follow-up reviews, complaint/special investigations, claim for reimbursement reviews, and financial reviews. Each State agency must develop and implement a monitoring system to ensure that sponsors, including site personnel, and the sponsor's food service management company, if applicable, immediately receive a copy of any review reports which indicate Program Violations and which could result in a Program disallowance.

VI. PROCEDURES

A. Pre-Approval Visits

Per 7 CFR 225.7(d), State agencies must conduct pre-approval visits of sponsors and sites to assess the applicant sponsor's or site's potential for successful Program operations and to verify information provided in the application. The State agency must visit, prior to approval:

- A. All applicant sponsors that did not participate in the Program in the prior year;
- B. All applicant sponsors that had operational problems noted in the prior year; and
- C. All sites that the State agency has determined need a pre-approval visit.
- D. Pre-approval visits of sponsors proposing to operate the Program during unanticipated school closures may be conducted at the discretion of the State agency.

Each State agency must establish a process to determine which sites need pre-approval visits. Characteristics that must be considered include, but are not limited to:

- A. Sites that did not participate in the Program in the prior year;
- B. Existing sites that are new to non-congregate meal service; and
- C. Existing sites that exhibited operational problems in the prior year.

B. Sponsor and Site Reviews

In determining which sponsors and sites to review, as per 7 CFR 225.7(e), the State agency must, at a minimum, consider the sponsors' and sites' previous participation in the Program, their current and previous Program performance, whether they operate as congregate or non-congregate sites, and the results of previous reviews. When the same SFA personnel administer the SFSP as well as the National School Lunch Program (NSLP), the State agency is not required to conduct a sponsor or site review in the same year in which the NSLP operations have been reviewed and determined to be satisfactory.

Frequency and Number of Required Reviews

Per 7 CFR 225.7(e)(4), State agencies are required to conduct the following reviews in the SFSP:

- A. A review of every new sponsor at least once during the first year of operation;
- B. Annually review every sponsor that experienced significant operational problems in the prior year;
- C. Review each sponsor at least once every 3 years;
- D. Review more frequently those sponsors that, in the determination of the State agency, require

additional technical assistance;

- E. Conduct reviews of at least 10 percent of each reviewed sponsor's sites, or one site, whichever number is greater. The review sample must include sites representative of all meal service models operated by the sponsor. DECAL assesses sponsored sites within the first 3 weeks of the sites' operations; however, a site is subject to additional reviews at any time during a site's operation.

Site Selection Criteria

State agencies must develop criteria for site selection when meeting the minimum number of site reviews required, as per 7 CFR 225.7(e)(5). Characteristics that should be reflected in the sites selected for review include:

- A. The maximum number of meals approved to serve;
- B. Method of obtaining meals (i.e., self-preparation or vended meal service);
- C. Time since last site review was conducted by the State agency;
- D. Type of site (e.g., open, closed enrolled, camp);
- E. Type of physical location (e.g., school, outdoor area, community center);
- F. Rural designation or non-rural designation
- G. Type of meal service (i.e., congregate or non-congregate);
- H. If non-congregate, meal distribution method (e.g., meal pick-up, delivery); and
- I. Affiliation with the sponsor.

Review Content for Sponsor Reviews

Per SFSP regulation, State agencies are required to include the following during sponsor reviews:

- A. Meal claim validations;
- B. An assessment of the sponsor's expenditures to determine if expenditures are allowable and that all food service funds are properly identified and recorded as food service revenue;
- C. A review of expenditures to ensure they are consistent with budgeted costs and the previous year's expenditures taking into consideration any changes in circumstances;
- D. A review of the sponsor's nonprofit food service to ensure that all Program reimbursements are used solely for conducting a food service operation; and
- E. A review of administrative spending to determine if the spending is reasonable and does not affect the sponsor's ability to operate a nonprofit food service and provide a quality meal service.

Sponsor reviews will also include assessments of the following (not an exhaustive list):

- A. Training requirements;
- B. Civil Rights compliance;
- C. Administrative responsibilities such as application maintenance and governing board requirements;

- D. Site eligibility;
- E. Non-congregate requirements;
- F. Food service health, safety, and sanitation requirements;
- G. Fiscal recordkeeping and integrity, to include financial management system assessments;
- H. Procurement; and
- I. The sponsor's monitoring of its sponsored sites.

It is important to note that DECAL may assess any and all Program requirements even when conducting follow-up reviews, serious deficiency reviews, complaint investigations, claim for reimbursement reviews, or financial reviews.

Review Content for Site Reviews

Site reviews will include assessments of the following (not an exhaustive list):

- A. Site recordkeeping;
- B. Meal delivery and meal service observations;
- C. Civil Rights requirements compliance;
- D. Site eligibility;
- E. Non-congregate requirements;
- F. Food service health, safety, and sanitation requirements; and
- G. Site application maintenance.

C. Food Service Management Company Reviews

For those sponsors that are vended and purchase unitized meals, with or without milk, the meal production facility and meal production documentation of any food service management company (FSMC) from which the sponsor purchases meals must be reviewed to ensure compliance with Program requirements. Central kitchens operated by self-preparation sponsors are also subject to DECAL review, in addition to self-preparation sites' production facilities.

FSMC reviews must be conducted at least one time within the appropriate review cycle for each vended sponsor. If multiple vended sponsors use the same FSMC and are being reviewed in the same review cycle, a single facility review will fulfill the review requirement for those vended sponsors.

State agencies must also respond promptly to complaints concerning these facilities. If the FSMC fails to correct violations noted by the State agency during the review, the State agency must notify the sponsor and the FSMC that reimbursement must not be paid for meals prepared by the FSMC after a date specified in the notification.

D. Follow-up and Serious Deficiency Follow-up Reviews

Per 7 CFR 225.7(f), State agencies must conduct follow-up reviews of sponsors and sites as necessary. DECAL may conduct a follow-up review after findings have been issued during a site review, sponsor review, FSMC review, complaint investigation, claim for reimbursement review or a financial review.

Follow-up reviews are conducted to ensure that corrective actions put into place by sponsors to eliminate future findings have been implemented, followed, and that the findings were not repeated.

During the serious deficiency process after a sponsor is issued a Notice of Successful Corrective Action and Temporary Deferment, DECAL will conduct a technical assistance visit and a follow-up review to ensure the serious deficiencies were fully and permanently corrected. This follow-up review is known as a 'serious deficiency follow-up review.' If during the serious deficiency follow-up review, DECAL finds that the serious deficiencies have reoccurred, DECAL will propose that the organization be terminated and disqualified from the SFSP. A proposed termination from either program is an adverse action and is appealable. For further information regarding the serious deficiency process please see [DECAL Policy #15 - Serious Deficiency Process for Sponsors in the Summer Food Service Program](#).

E. Complaint/Special Investigations

Per 7 CFR 225.11(b) each State agency shall promptly investigate complaints received or irregularities noted in connection with the operation of the SFSP and shall take appropriate action to correct any irregularities. The State agency shall maintain on file all evidence relating to such investigations and actions and inform the appropriate FNSRO of any suspected fraud or criminal abuse in the SFSP which would result in a loss or misuse of Federal funds. USDA may make investigations at the request of the State agency, or where USDA determines investigations are appropriate.

F. Recordkeeping Requirements

SFSP Sponsors shall maintain accurate records justifying all meals claimed and documenting that all Program funds were spent only on allowable Child Nutrition Program costs. Failure to maintain such records may be grounds for denial of reimbursement for meals served and/or administrative costs claimed during the period covered by the records in question. The sponsor's records shall be available at all times for inspection and audit by representatives of the Secretary, the Comptroller General of the United States, and the State agency for a period of three years following the date of submission of the final claim for reimbursement for the fiscal year. The records must be maintained at the location indicated in sponsors' management plans. [DECAL Policies #5 - Recordkeeping Requirements for All Sponsors and Sponsored Facilities Participating in the SFSP](#) and [#20 - Financial Recordkeeping in the Child and Adult Care Food Program and the Summer Food Service Program](#), outline specific recordkeeping requirements for both overall SFSP and financial management compliance.

It is vital to Program operations that institutions have readily available all SFSP records that support not only claims for reimbursement submitted but financial records showing receipt and use of SFSP funds. Program records are requested during all types of State agency SFSP reviews. Failure to provide Program supporting records will likely result in findings, reclaims of meal reimbursements and/or unallowable costs due back to a sponsor's SFSP food service account.

V. COMMENTS

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

