What to Expect: Summer Food Service Program (SFSP) Review Fiscal Year 2021

ONLINE COURSE

Released January 2021

Arizona Department of Education (ADE)

This training was developed by the Arizona Department of Education (ADE) Health and Nutrition Services Division (HNS).

Intended Audience

This training is intended for **School Food Authorities (SFAs) and Community Organizations (COs) operating the Summer Food Service Program (SFSP).** All regulations are specific to operating the SFSP under the direction of ADE.

Training Hours

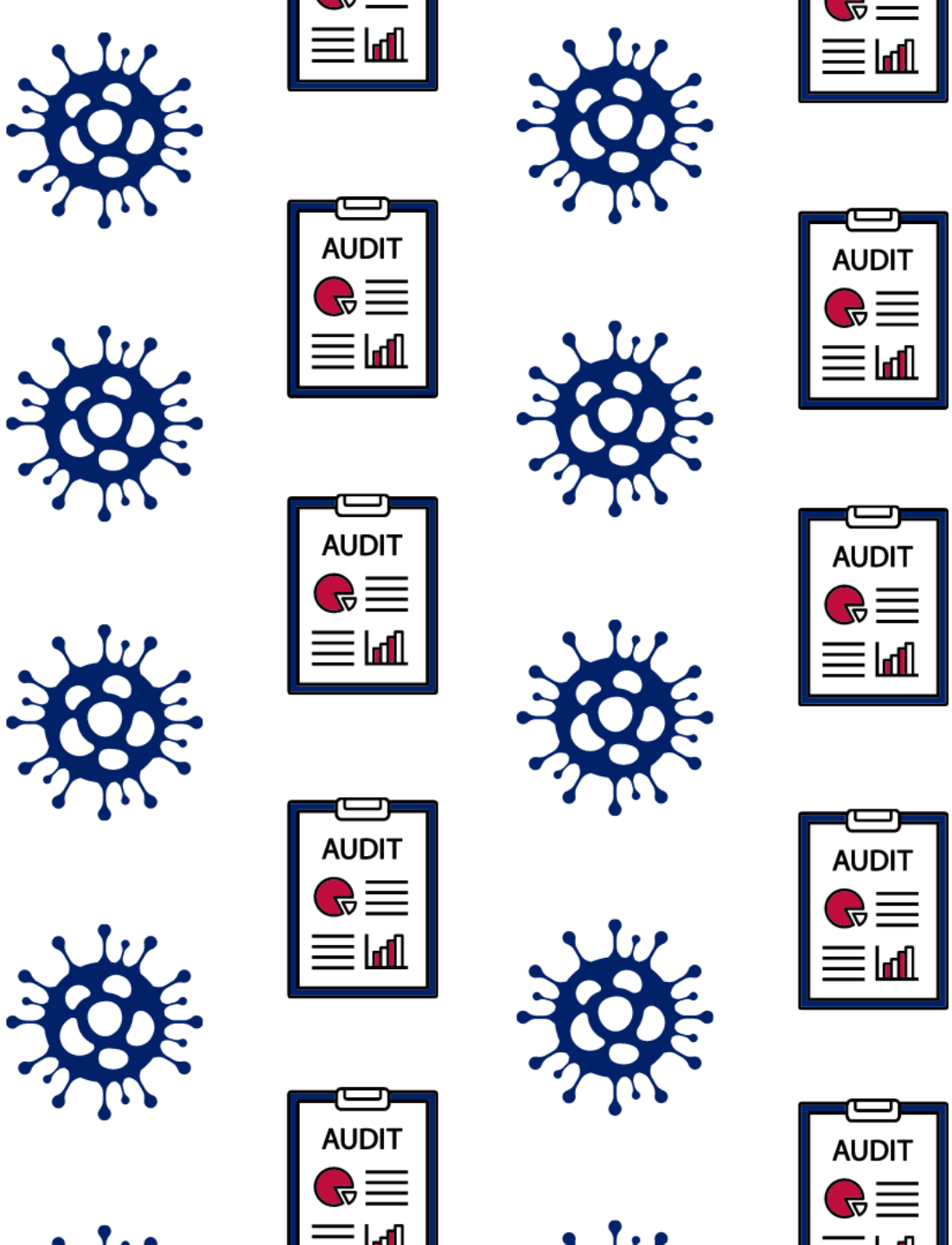
A training certificate will be available at the end of this course. This training does **not** count toward Professional Standards requirements.

Length: 30 minutes

Objectives

At the end of this training, attendees will:

- understand the State agency monitoring requirements for organizations operating the Summer Food Service Program (SFSP);
- know what to expect of the review process;
- be aware of the documents that must be submitted to the reviewer; and
- understand potential review outcomes and actions to be taken after the review.



What to Expect: Summer Food Service Program

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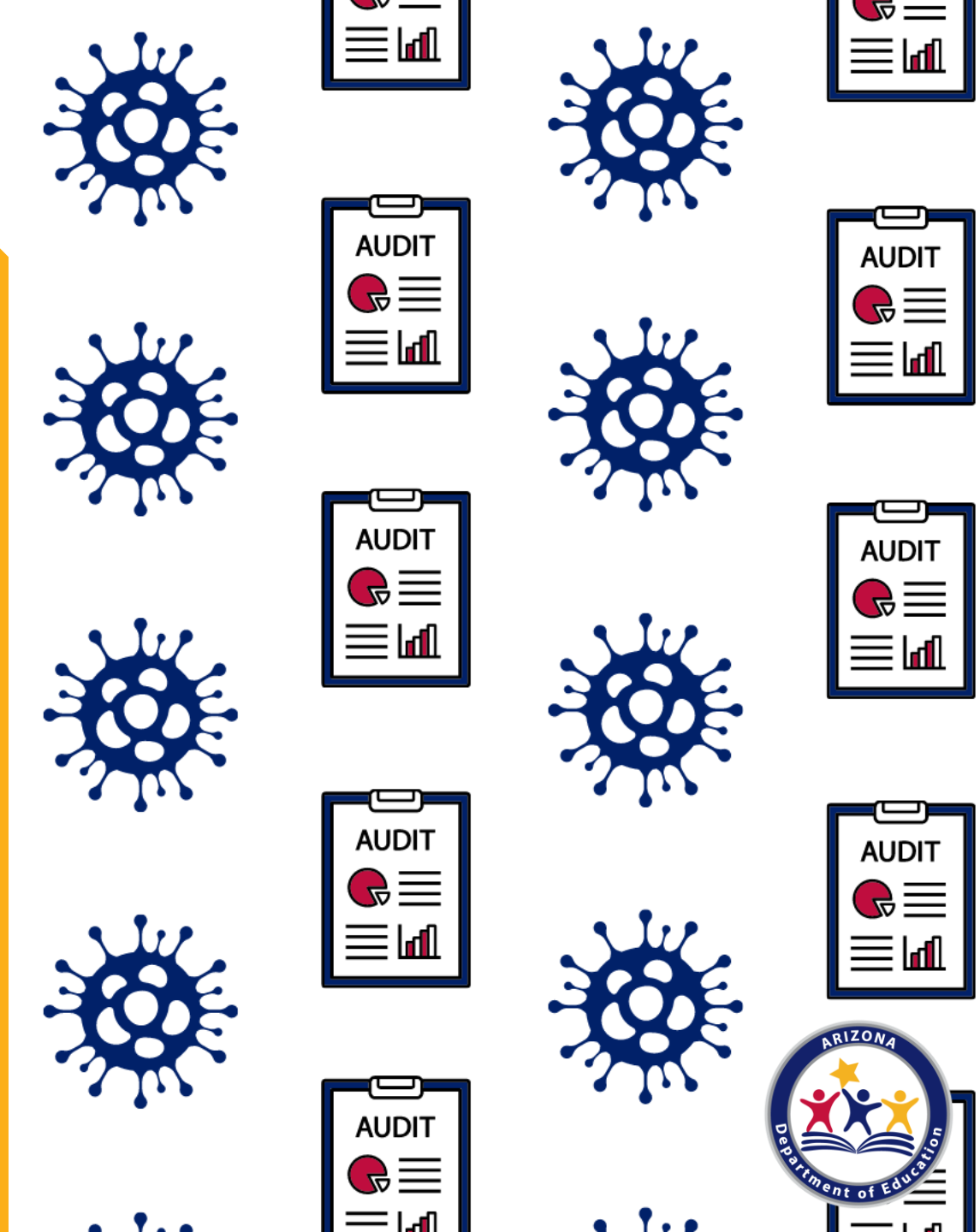
Section 1

State Agency Monitoring Requirements



State Agency Monitoring Requirements

Summer Food Service Program Review

The Arizona Department of Education (ADE) is required to conduct Summer Food Service Program (SFSP) Reviews on School Food Authorities (SFAs) and Community Organizations (COs) **at least once during each three-year review cycle**.

Additionally, ADE will review:

- any new operators to SFSP (first year of operation will begin their three-year review cycle); and
- operators with significant operational findings during the prior year SFSP review.

State Agency Monitoring Requirements

Scheduling the SFSP Review

The SFSP operates under a Fiscal Year (FY), October – September. Traditionally, operators will participate only a few months of the FY (during the summer months). Since reviews must be conducted when SFSP is in operation, ADE will schedule all operators who are required to receive a review to receive a SFSP review during the same months of the FY.

Typical Months of SFSP Operations and SFSP Review during a FY

- October
- November
- December
- January
- February
- March
- April
- May
- **June**
- **July**
- August
- September

State Agency Monitoring Requirements

Scheduling of the SFSP Review FY 2021

Months of SFSP Operations and SFSP Review during FY 2021

- October
- November
- December
- January
- February
- March
- April
- May
- June
- July
- August
- September

The USDA COVID-19 waivers allow SFAs/COs to participate in SFSP through June 30, 2021, extending the typical months of SFSP operation. The first round of FY 2021 SFSP Reviews will be conducted January – June 2021 to review all currently operating SFAs/COs who meet the review criteria (slide 9). If the same entities continue to operate SFSP through the summer months, their review requirement would have already been met.

ADE will release (if applicable) an additional review schedule to capture any SFSP operators operating outside of the waivers (traditional summer months) to ensure all FY 2021 operators who meet review criteria are reviewed.

State Agency Monitoring Requirements

SFSP Review Criteria for FY 2021

The review schedule for FY 2021 includes:

- An SFA or CO in their three-year review cycle;
- Any SFA new to operating SFSP; and
- SFAs who were scheduled for an Administrative Review for SY20-21 and chose to operate the SFSP under the COVID-19 Waiver.

If needed, ADE will release an additional SFSP review schedule in the summer to account for entities eligible for a review that are not currently operating SFSP but choose to operate SFSP during the summer months of FY 2021. The schedule will include operators meeting any of the criteria on slide 6.

State Agency Monitoring Requirements

Areas of the SFSP Review

The SFSP Review will focus on the accountability requirements in the areas of:

- Counting and Claiming
- Food Service
- Costs
- Financial Audit
- Food Safety
- Civil Rights
- Monitoring and Site Records
- Site Agreement
- Recordkeeping
- Water (waived for meals served outside the cafeteria)
- Site Eligibility
- SFA Operations (advertising materials, recordkeeping, etc.)
- Media Release
- Training

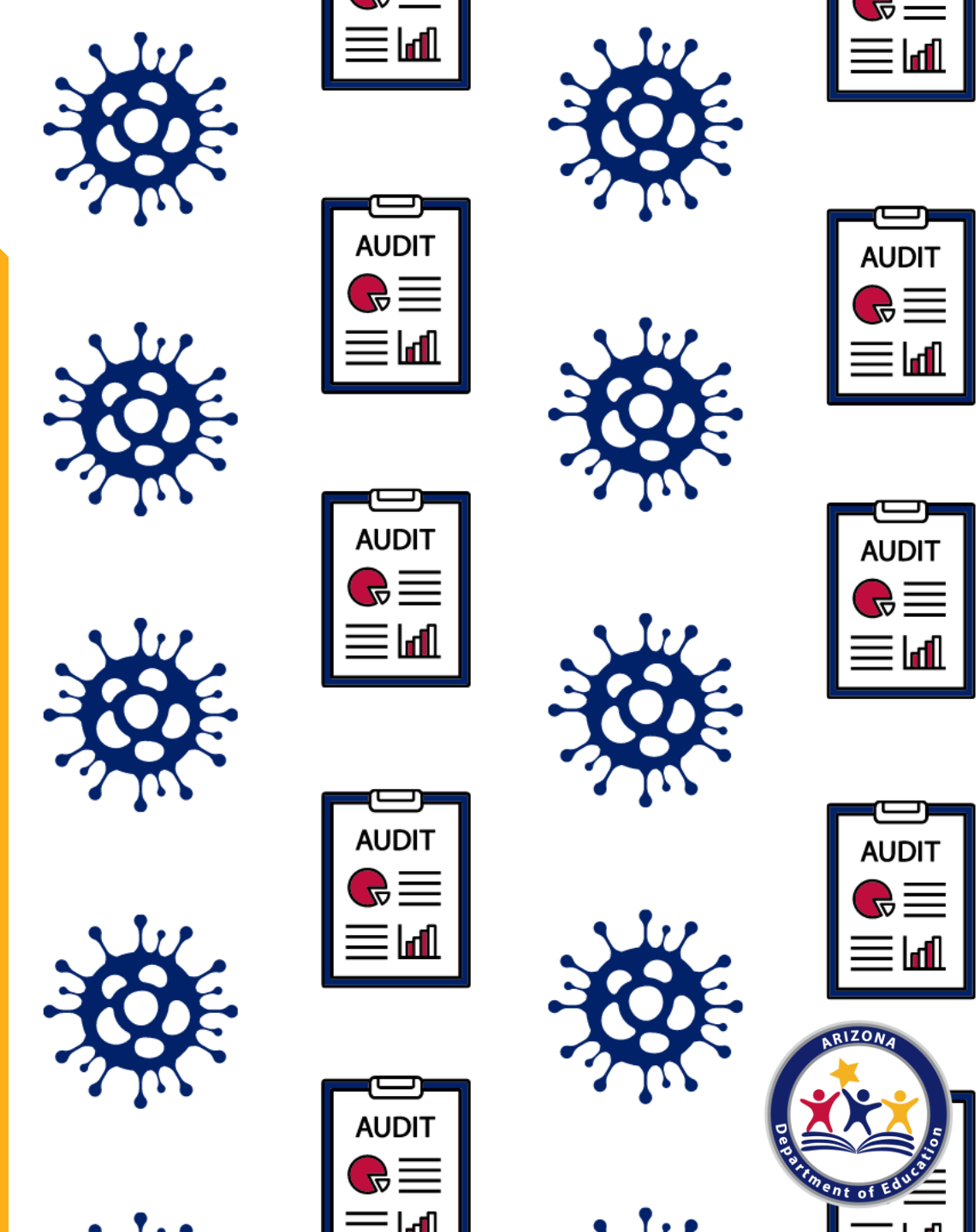
State Agency Monitoring Requirements

On-site and Off-site Requirements of the Review

ADE will conduct a Site Visit to observe on-site meal service as well as collect operational documentation for a specified timeframe to review off-site. Once the on-site observation has been conducted and all records have been reviewed, ADE will document if the SFA/CO is in compliance with SFSP requirements.

Section 2

The SFSP Review Process



The SFSP Review Process

What to Expect of the SFSP Review FY 2021

The SFSP Review occurs in the following order. SFAs/COs will:

- Complete the Risk Assessment
- Confirm Site Visit and assigned Reviewer
- Receive Site Visit(s) for all site(s) selected
- Attend an Entrance Conference and receive the Administrative Review Checklist
- Compile and send review documents to reviewer
- Attend an Exit Conference and sign Administrative Review Form
- Receive a SFSP Review Letter and/or Close Out letter

The SFSP Review Process

Risk Assessment

The SFSP Risk Assessment was created by ADE to assist in reviewing operators during COVID-19. The assessment will collect operational details to how the site(s) are operating, and which waivers have been utilized.

SFAs/COs receiving a SFSP Review were emailed the SFSP Risk Assessment on January 11, 2021. The completed assessment must be emailed to SFSP@azed.gov by January 22, 2021.

If the SFA/CO was notified of a review and did not receive an email from the SFSP inbox (SFSP@azed.gov) with an attached Risk Assessment, please email the SFSP inbox requesting another copy.

The SFSP Review Process

Risk Assessment

The Risk Assessment contains a table to list all sites the SFA/CO is operating under SFSP. For each site, the SFA/CO will need to indicate if the **site** is implementing the following:

- Parent/Guardian Pick-up Plan
- Multiple Meal Distribution Plan
- Area Eligibility Waiver
- Mobile Delivery of Meals
- Multiple Methods of Meal Distribution

The SFSP Review Process

Risk Assessment - Site Selection

Reviews must be conducted on at least 10% of each sponsor's sites, or one site, whichever number is greater. For SFAs/COs with more than one site, the SFSP Risk Assessment will assist the reviewer in determining which sites will be reviewed.

Number of Sites	Minimum Number of Sites to Review for SFSP
1 to 10	1
11 to 20	2
21 to 30	3
31 to 40	4

The SFSP Review Process

Confirmation of Site Visit

ADE sent an e-blast in December alerting that the Review Schedule was posted on the ADE website identifying which SFAs/COs will be receiving a SFSP Review.

The SFSP Reviewer will contact the SFA/CO up to **four weeks** prior to the Site Visit and discuss:

- Which site(s) were selected to receive the Site Visit(s)
- Which meal service will be observed
- Which month the Site Visit will occur. Please note that the reviewer will notify the SFA/CO prior to coming on-site, but it is the discretion of the reviewer to disclose the specific day Site Visit will occur.

The SFSP Review Process

Assigned Reviewer

Generally, the ADE Specialist with whom you have been working on your SFSP application throughout the FY will also be your assigned SFSP Reviewer.

- Sponsors operating the **SFSP** will be reviewed by the **Community Nutrition Program Specialists**.

The SFSP Review Process

Day of Site Visit(s)

The purpose of the Site Visit is to observe compliance with SFSP regulations under the USDA flexibilities and specific waivers opted into by the SFA/CO. The Site Visit will ensure the following:

- Meals being served meet the meal pattern
- Reimbursable meals are counted at the Point of Service (POS)
- Proper food safety measures are being followed
- “And Justice For All” poster and menu are displayed to program participants
- Meal service is occurring as described by the SFA/CO in the CNPWeb applications and waiver submissions, if applicable (*Parent/Guardian Pick-Up Waiver, Multiple Day Meal Distribution Plan)*

The SFSP Review Process

Expectations of the Site Visit

Efforts will be made to conduct a Site Visit for each site selected. The reviewer will observe the meal service set up and meal service at the POS. ADE will request access to areas other than the POS if observations require further investigation.

This portion of the review will be accomplished from a safe distance established by the SFA/CO and the reviewer after discussing safety protocols and site based COVID-19 related restrictions.

- Observation for sites with an outside point of service (i.e. curbside pick-up, bus routes, or home delivery) will be conducted with the reviewer present at the point of service.
- Observation for sites with a point of service in a building (i.e. cafeteria or classroom) may be reviewed if all POS are located inside.

The SFSP Review Process

Meal Service Observations

While each SFA/CO will be evaluated for compliance during the Site Visit, the on-site observation will vary based on the service method, safety protocols, and site-based COVID-19 restrictions.

ADE understands that there may be challenges in observing meal service specifics from a distance. Should the reviewer need additional clarification on any of the program requirements based on what was observed during meal service, the reviewer will contact the SFA/CO and discuss any clarification needed.

The SFSP Review Process

Day of Site Visit - Menu

During meal service observation, the reviewer will ask to view each meal provided during the meal service to ensure the meal(s) meet the respective meal pattern and match what was published on the menu.

- If the site serves more than one meal at the observed meal service, the reviewer will view both meals to ensure meal pattern compliance has been met. *For example, if the site serves both breakfast and lunch during the observed meal service, both breakfast and lunch will be assessed for compliance.*
- If the site serves multiple days worth of meals during the observed meal service, the reviewer will view all meals for all days and ensure meal pattern compliance for all meals and all days. *For example, if the site serves four days of breakfast and lunch during the observed meal service, all eight meals will be assessed for compliance.*

The SFSP Review Process

Observation of Mobile Meal Service

If the site selected for review operates a mobile meal service via bus route or home delivery, be prepared to provide the following with the reviewer prior to observation:

- Bus departure site address, departure time and bus number
- List of stops on bus route (include addresses and approximate stop times)
- Bus driver or server contact information

The SFSP Review Process

Entrance Conference

An Entrance Conference will be held virtually after the Site Visit(s). At minimum, the Food Service Director/Program Contact is required to participate in the Entrance Conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.

During the Entrance Conference, the reviewer will discuss the remaining review timeline, provide a copy of the Administrative Review Checklist, and provide an opportunity for the SFA/CO to ask any questions.

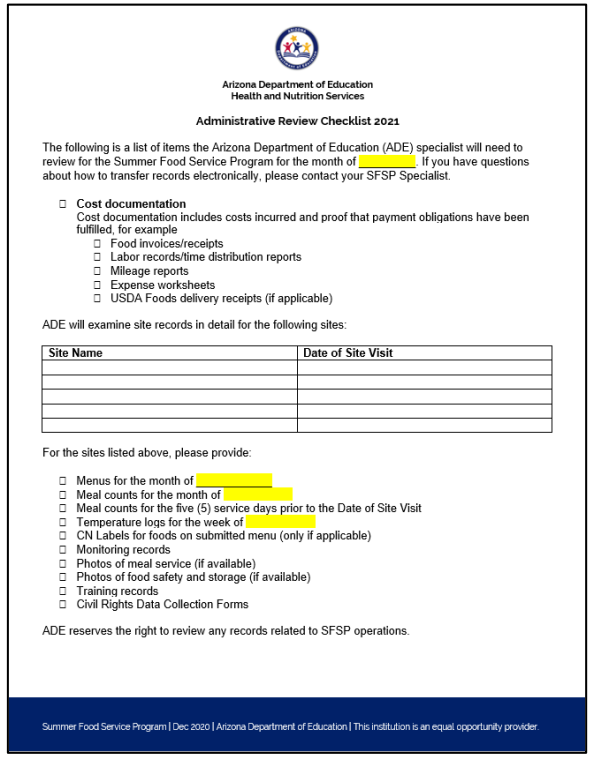
The SFSP Review Process

The Administrative Review Checklist

The SFSP Administrative Review Checklist lists all documentation the operator will need to provide to ADE.

The SFA/CO will have five business days to submit the requested documents via the BDS Secure File Transfer System. The reviewer will provide instructions on the use of the BDS Secure File Transfer System.

Mail or drop-off is not encouraged at this time. If BDS is not possible, the SFA/CO will need to contact their reviewer as soon as possible to ensure all documents are submitted on time.



Arizona Department of Education
Health and Nutrition Services

Administrative Review Checklist 2021

The following is a list of items the Arizona Department of Education (ADE) specialist will need to review for the Summer Food Service Program for the month of _____. If you have questions about how to transfer records electronically, please contact your SFSP Specialist.

- ☐ **Cost documentation**
  Cost documentation includes costs incurred and proof that payment obligations have been fulfilled, for example
  - ☐ Food invoices/receipts
  - ☐ Labor records/time distribution reports
  - ☐ Mileage reports
  - ☐ Expense worksheets
  - ☐ USDA Foods delivery receipts (if applicable)

ADE will examine site records in detail for the following sites:

Site Name	Date of Site Visit

For the sites listed above, please provide:

- ☐ Menus for the month of _____
- ☐ Meal counts for the month of _____
- ☐ Meal counts for the five (5) service days prior to the Date of Site Visit
- ☐ Temperature logs for the week of _____
- ☐ CN Labels for foods on submitted menu (only if applicable)
- ☐ Monitoring records
- ☐ Photos of meal service (if available)
- ☐ Photos of food safety and storage (if available)
- ☐ Training records
- ☐ Civil Rights Data Collection Forms

ADE reserves the right to review any records related to SFSP operations.

Summer Food Service Program | Dec 2020 | Arizona Department of Education | This institution is an equal opportunity provider.

SFSP Administrative Review Checklist 2021

The SFSP Review Process

Compile and Send Review Documents to Reviewer

SFAs/COs are required to provide documentation for general SFSP operational program documents, as well as date specific meal counting records and menu documentation. Documentation will only be needed for sites that received a Site Visit. Documentation request will include:

- Meal counts for a month of operation, the day of the Site Visit and five serving days prior to the Site Visit
- Menu documentation for a month of operation and menu for the day of the Site Visit
- Cost documentation to review costs incurred and proof that payment obligations for a month of operation
- Documentation required annually for program operation at the site level

The SFSP Review Process

Summary of Meal Counting Records and Menu Documentation

	A Month of Operation	Five days prior to Site Visit	Day of Site Visit
Meal Counting Records	Meal counts for all SFSP meal services	Meal counts for all SFSP meal services	Meal counts for all SFSP meal services
Menu Documentation	Menu documentation for all SFSP meal services for a month operation, photo of a day of meal service		Menu for all SFSP meal services observed

The SFSP Review Process

Checklist: Menu Documentation

Menu documentation is only required for the sites selected for the review.

- Menus for the month of review
- CN Labels for foods on submitted menu (if applicable)
- *Meal Pattern Waivers (see next slide)*

The SFSP Reviewer will evaluate the menu for the month of review to ensure that each meal met the components for the meal pattern selected in your approved CNPWeb application.

Please note that if the reviewer deems it necessary, they may ask for additional menu documentation.

The SFSP Review Process

Meal Pattern Waiver Submissions

The SFA/CO will need to notify the reviewer of any meal pattern waivers submitted during the review month by the deadline indicated on the Administrative Review Checklist. Failure to notify the reviewer of meal pattern waivers may result in meal pattern non-compliance.

The SFSP Review Process

Checklist: Meal Counting Documentation

Meal counting documentation is included within the SFSP Administrative Review Checklist.

- Meal counts for the review month, separated by meal service (i.e., breakfast counts and lunch counts).
- Meal counts for the five service days prior to the date of Site Visit

The reviewer will use the meal count data to ensure the accuracy of the claim for the review month, as well as evaluate whether the observed meal service counts are typical of the site that was visited.

The SFSP Review Process

Checklist: Cost Documentation

ADE will review costs incurred and proof that payment obligations have been fulfilled, for example:

- Food invoices/receipts
- Labor records/time distribution reports
- Mileage reports
- Expense worksheets
- USDA Foods delivery receipts (if applicable)

This documentation is used to determine that your organization has expended the full SFSP reimbursement amount for the month of review on allowable Program costs.

The SFSP Review Process

Checklist: Site Documentation

- Temperature logs for the week of (selected from review month)
- Monitoring records
- Photos of a day of meal service (if available)
- Photos of food safety and storage (if available)
- Training records
- Civil Rights Data Collection Forms

The SFSP Review Process

Additional Site Documentation

The reviewer may request additional documents related to SFSP operations at any time during the review that are not itemized on the Administrative Review Checklist. These additional documents may include:

- Third Party Audit
- Outreach Materials
- Health Department or Kitchen Permit Records
- Any other records related to Program operations

The SFSP Review Process

Exit Conference

An Exit Conference will occur virtually approximately two weeks after the Entrance Conference. At minimum, the Food Service Director/Program Contact is required to participate in the Entrance Conference, but it is encouraged to include an administrator and any individuals who are directly involved with the food service operation.

During the Exit Conference the reviewer will provide technical assistance and answer any pending questions regarding the review. If applicable, the reviewer may discuss review findings or fiscal action found thus far and what corrective action will be required of the SFA/CO.

The SFSP Review Process

Administrative Review Form

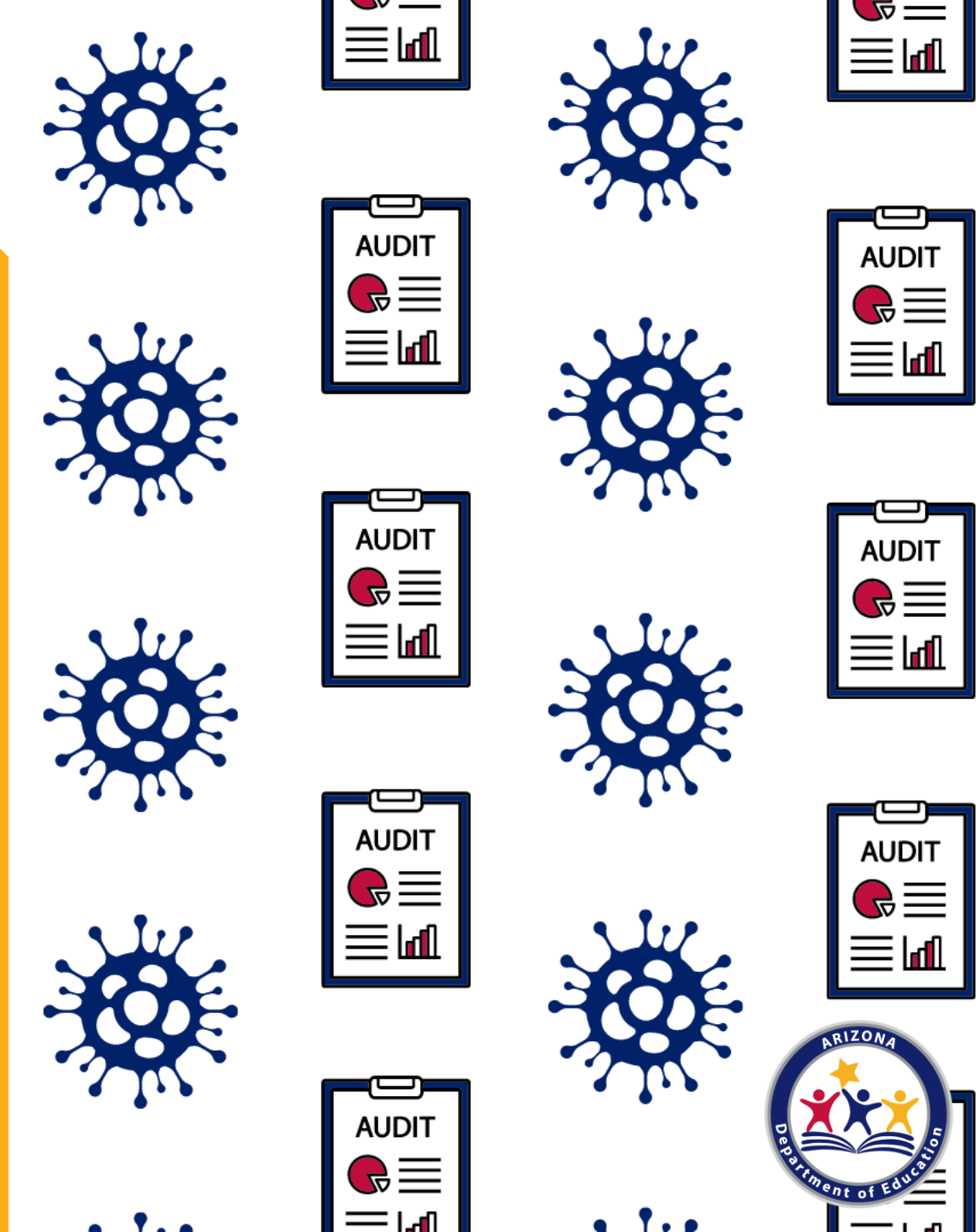
After the Exit Conference is complete and findings are discussed, the ADE Reviewer will send the Administrative Review Form to the SFSP Program Contact for an electronic signature via AdobeSign.

The ADE Reviewer will also provide the SFA/CO with copies of any Site Visit Forms completed as part of the review.

If the review resulted in no findings, the SFA/CO will receive a Close-Out Letter and the review is considered closed. If the review resulted in any findings the SFA/CO will receive additional correspondence requiring further action.

Section 3

Responding to Review Findings



Responding to Review Findings

Responding to a Review Letter

Corrective Action Letter/Fiscal Action Letter

The SFA/CO will receive a written summary of any review findings, required corrective action, and fiscal action (if applicable). The SFA/CO is responsible for ensuring all corrective action and fiscal action (if applicable) is received by the given deadline. Should these post review actions not be completed by the deadline, the SFA/CO will be placed on a reimbursement hold until the actions are complete.

Notice of Serious Deficiency

If the review resulted ADE deeming the entity as seriously deficient, the SFA/CO will receive a written summary of the review findings and requirements of a corrective action plan.

Responding to Review Findings

Corrective Action

Corrective Action means actions required to correct any violation identified during the review and must be applied to all sites in the SFA/CO, as appropriate. Corrective action may include correction of incorrect processes and/or training.

A written response must be provided by the deadline indicted in the Corrective Action Letter or the Fiscal Action Letter. The response must address all required corrective action items listed in the letter. It is best practice to submit corrective action prior to the deadline in case any revisions are required.

The SFA/CO will receive a Close-Out Letter when sufficient corrective action is submitted.

Responding to Review Findings

Fiscal Action

Fiscal action includes, but is not limited to, the recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid Claims for Reimbursement, submission of a revised Claim for Reimbursement, and correction of records to ensure that unfiled Claims for Reimbursement are corrected when filed. It also includes disallowance of funds for failure to take corrective action to meet the meal requirements.

The Fiscal Action Letter will provide the total amount that was assessed due to review findings. Additionally, the letter will require a written response to address all required corrective action items.

The SFA/CO will receive a Close-Out Letter when sufficient corrective action is submitted, and fiscal action has been submitted or recovered.

Responding to Review Findings

Fiscal Action Disregard

If fiscal action is assessed and the total sum is less than $600, the fiscal action is disregarded, and the funds are not recovered.

- *For example, if $100 fiscal action that was assessed during the SFSP Review, ADE will disregard the $100 of fiscal action.*

Responding to Review Findings

Notice of Serious Deficiency

If there are multiple serious and/or repeated findings, ADE may determine that an SFA/CO is **Seriously Deficient**. Serious Deficiency can be corrected through Corrective Action, however repeated findings can lead to termination.

If your organization received a Notice of Serious Deficient, please work closely with your SFSP Reviewer to create and execute effective Corrective Action Plans to obtain the knowledge and training needed to support successful future operations.

Congratulations!

You have completed *What to Expect: Summer Food Service Program (SFSP) Review Fiscal Year 2021.*

Requesting a training certificate

Please click on the link below to complete a brief survey about this training. Once the survey is complete, you will be able to print your certificate of completion from SurveyMonkey. **This will not appear in your Event Management System (EMS) Account.*

https://www.surveymonkey.com/r/8SHXW89

Please Note: This training does **not** count toward Professional Standards requirements.

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1. *mail: U.S. Department of Agriculture*
   Office of the Assistant Secretary for Civil Rights
   1400 Independence Avenue, SW
   Washington, D.C. 20250-9410;
2. *fax: (202) 690-7442; or*
3. *email: program.intake@usda.gov.*

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