

Summer Food Service Program Desk Audit Guidance for Sponsors During Summer 2020

Purpose

In response to COVID-19, on March 26, 2020, the USDA granted a nationwide waiver of the on-site monitoring requirement for Sponsors found in 7 CFR 225.15(d), set to expire June 30, 2020. On June 8, 2020, USDA released [COVID-19: Child Nutrition Response #30 Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program - EXTENSION](#), which extends the waiver until August 31, 2020. This waiver allows social distancing efforts to maintain the safety of all program operators.

To ensure program integrity during this time, Summer Food Service Program (SFSP) organizations should continue to monitor activities of program operations, whether on-site or off-site. Sponsors should still consider performing on-site visits for sites if it is allowed under current public health recommendations. Off-site monitoring can be performed through a desk audit instead of an on-site review if an on-site visit is not feasible. Monitoring and oversight can include using a variety of different methods to collect the required information to complete an off-site review.

Desk Audit Review Guidance

Although monitoring reviews may be conducted off-site, it is still important that Sponsors monitor the operations of SFSP sites. Sponsors are still expected to complete the pre-operational review (as applicable), first week review (as applicable), and site review for all sites. This can be accomplished through a desk audit.

Sponsors have a variety of ways they can continue to fulfill the review requirements, including interviews over the telephone or computer and by providing materials via mail or e-mail.

In order to answer the questions on the forms, Sponsors can review paperwork, including site eligibility documentation, menus and production records or other meal pattern documentation, invoices and receipts, daily and monthly meal counts sheets, delivery receipts, staff training documentation, operational labor documentation, and procurement documents.

Once completed, the Sponsor must review the forms with the site via telephone, email or video call to go over any findings, corrective action or technical assistance provided. The Sponsor will then send the form to the Site Supervisor to sign, which can be done through mail, fax or email. Electronic signatures are acceptable. After forms have been sent back to the Sponsor, they must be maintained on file for at least three years, plus the current year.

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

Visual observation of meal preparation and service are important to review to check for meal pattern compliance, proper meal counting, and food safety and sanitation. Examples of alternative observation methods Sponsors can use are videos and pictures. The Sponsor could also use a live video call via phone or computer to perform visual parts of the review.

Delivering Meals

For sites delivering non-congregate meals from buses or delivery vehicles at various stops in the community, complete the review forms for the site the meals originate from. A separate review of each bus or route is not necessary unless the stop is listed as a site in the Sponsor's application packet in CNPWeb.

SFSP 2020 Monitoring Forms

All of the monitoring forms are available on the Vermont Agency of Education Child Nutrition Programs [Summer Food Service page](#).

- [Pre-Operational Review Form Summer 2020](#)
- [First Week Review Form Summer 2020](#)
- [Site Review Form Summer 2020](#)

Pre-Operational Reviews

Pre-operational reviews are required for new sites or returning sites that experienced problems in the previous summer. The waiver allows this review to occur off-site. For Summer 2020 operation, sites that are new as of July 1 will require pre-operational reviews.

Pre-operational reviews must cover Program benefits and requirements and Sponsors must ensure sites can provide their proposed food service operations.

Note: Sponsors may continue to add new sites throughout the summer; however, no reimbursement will be received for meals served at these sites prior to the approval of the site applications. Please allow for a minimum of three business days prior to the start of a new site when submitting new site applications in CNPWeb.

First Week Review

First week reviews are required for new sites or returning sites that experienced problems in the previous summer. It is waived for returning sites that operated successfully in the previous summer, by indicating the waiver request in question 37 of the Site Application in CNPWeb.

The onsite monitoring waiver allows this review to occur off-site. For sites that operated during the unanticipated school closure and will continue to operate through the summer, the first day of operation for Summer 2020 will be July 1, 2020, for the purposes of the first week site review.

Site Review within the First Four Weeks of Operation

All sites must be reviewed within the first four weeks of operation. The waiver allows this review to occur off-site. For sites that operated during the unanticipated school closure and will

continue to operate through the summer, the first day of operation for Summer 2020 will be July 1, 2020, for the purposes of this site review.

The Sponsor should review all hardcopy materials that are typically reviewed during an on-site review. Records can be mailed, faxed, emailed or delivered to the Sponsor by the site. This includes meal pattern documentation, meal counts and reviewing training completion materials.

Racial and Ethnic Data Form

The State agency has reached out to the USDA for further information on Racial and Ethnic Data collection in Summer 2020. Guidance will be sent out once additional information is received.

Technical Assistance

Sponsors are expected to continue offering technical assistance as necessary to their sites. This may include phone calls, email communications, video calling or other methods of virtual communication.

State Agency Reviews

In response to COVID-19, on March 26, 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), set to expire June 30, 2020. On June 8, 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 31, 2020. This waiver promotes social distancing efforts to maintain the safety of all program operators. It will consist of a paperwork review of all sites. The Reviewer will ask for photographic documentation of certain aspects of program operation at selected sites. Further information on the structure of Administrative Reviews in Summer 2020 is forthcoming.

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