Welcome to Common Review Findings in the Summer Food Service Program hosted by Oregon Department of Education Child Nutrition Programs. This training will review the most common findings from SFSP administrative reviews conducted by ODE CNP Specialists and how to properly correct the findings to prevent them from occurring.

The objective of this training is to assist sponsors to operate SFSP successfully by identifying selected situations from reviews that have resulted in findings. We will discuss the situation, why it would be a finding, and how to correct the situation.

Situation #1

Point of service meal count taken based on the number of plates available for meal service

(Click) The first situation we will discuss involves the point of service meal count. During the review the Child Nutrition Specialist observes a meal service where the meal count is completed prior to meals being served. The sponsor explains to the Specialist that the meal count is taken based on the number of plates available before the meal service.
Situation #1 is a finding. The point of service meal count was executed incorrectly. The point of service meal count must be taken once a complete, reimbursable meal is offered to a participant. The point of service meal count cannot be taken prior to the meal being offered, or based on the number of plates available.

(Click) It is critical that site personnel and monitors understand the importance of accurate point-of-service meal counts. Only complete meals served to eligible children can be claimed for reimbursement. Therefore, meals must be counted at the actual point of service, i.e., meals are counted as they are served. This will ensure that an accurate count of complete and reimbursable meals is obtained and reported.

(Click) Point of service meal count requirements can be found in the SFSP Administrative Guidance for Sponsors Chapter 7 – Staff Duties and Training.
Now let's discuss corrections to prevent this finding.

(Click) To correct, the sponsor would need to (Click) develop and implement a Point of Service Meal Count procedure that ensures the point of service is taken as the meal is served to participants. In the procedure you would need to include staff position responsible for point of service meal counts at each site.

(Click) In addition, train the site staff on proper point of service meal counts and have records of this training available for review.

The second situation we will discuss involves the meal pattern requirements. (Click) During the review the Child Nutrition Specialist examines a menu that includes a combination pizza food item offered at a lunch service. The menu does not include any additional meat/meat alternate, but does include a fruit. The sponsor explains to the Specialist that the pizza, which includes cheese and green peppers and onions, credits toward the meat/meat alternate component and the fruit/vegetable component. The sponsor explains there is no crediting documentation for the combination pizza item.
Situation #2 is a finding.

(Click) The sponsor failed to meet meal pattern requirements. Crediting information was not maintained to document the amount of meat/meat alternate component and fruit/vegetable component the pizza credits.

(Click) Combination food items contain foods from more than one food group and credit for more than one meal component. Combination foods may be homemade or commercially prepared. Homemade combination foods are those that are assembled from multiple ingredients in a kitchen serving the Sponsor’s site(s), whether the kitchen is operated by the Sponsor or operated by the vendor from whom the Sponsor is purchasing meals.

(Click) To count a homemade combination food item toward meal pattern component requirements, the Sponsor must have a written recipe documenting the amount of all ingredients in the product. For commercially prepared combination foods the sponsor must have either a CN Label or product formulation statement (MPFS) on file.

(Click) Information on CN labels can be found in federal regulation 7 CFR 225.20. Information on product
formulation statements can be found in the SFSP Administrative Guidance for Sponsors Part 1 – Making the Most of Summer Meals.

Now let's discuss corrections you can make to prevent this finding.

(Click) To meet meal pattern requirements the sponsor should develop and implement a procedure for ensuring that all menu documentation for combination foods is maintained. In the procedure you will need to include what additional components would be offered during a meal service that included a combination food if crediting information is not available, i.e. cheese stick for the meat/meat alternate component and carrots for the fruit/vegetable component. This needs to be included in the procedure in order to guarantee a complete reimbursable meal is offered.

(Click) In addition, you would need to maintain the crediting documentation on file, e.g. the CN label, recipe (for homemade combination foods) or product formulation statement.
Situation three involves proper site monitoring. **(Click)** During the review the Child Nutrition Specialist assesses the site monitoring documentation for each site. There is no documentation available that shows first week visits were completed for all sites. There is documentation to demonstrate site reviews were completed, but not for all sites, and site reviews were not completed within the first four weeks of operation. The sponsor explains they didn’t know how often the sites must be monitored.

Situation #3 is a finding. **(Click)** The sponsor failed to conduct and document all site monitoring visits and reviews.

**Click** Sponsors must ensure that all monitoring requirements are met. At a minimum, sponsors must complete the following monitoring requirements:

- Pre-operational Visits –
Sponsors should visit all new and problem sites before they begin operations. These visits are required to make sure that the sites have facilities to provide meal services for the number of children expected to attend.

Site Visits – Generally, sponsors are required to visit all sites at least once during the first week of operation. However, the first week site visit requirement is waived for returning sites that operated successfully during the previous summer (or other most recent period of operation) and had no serious deficiency findings. Sponsors of these sites are still required to review the site within the first four weeks of operation.

Site Reviews – Sponsors must review all sites at least once during the first four weeks of program operations. After this initial period, sponsors must conduct a “reasonable” level of monitoring. If a site operates less than four weeks, the sponsor must still conduct a review.

All visits and reviews must be documented. Records of visits and reviews will help sponsors assess the operation of sites.
(Click) Information on site monitoring requirements can be found in the SFSP Monitor’s Guide – Monitor Responsibilities (Monitor’s Guide also includes sample visit and review forms), as well as the SFSP Administrative Guidance for Sponsors Chapter 8 – Program Integrity.

Now let’s discuss corrections that can be made to prevent this finding.

(Click) The sponsor would need to develop and implement a procedure for site monitoring. The procedure would need to include a SFSP schedule that states when site visits and reviews will be completed and a system for handling monitor reports. Sponsors should have a system that will ensure that monitors return reports frequently. The reports should be immediately reviewed by sponsor’s staff who is responsible for following up on any
problems. In the procedure, include the staff responsible for reviewing the reports, that the reports will be reviewed for quality and how additional training will be provided if monitors do not complete the monitor reports adequately. In addition, you will need to include which staff will be responsible for following up on any problems identified during site visits or reviews.

(Click) Further, the sponsor would need to train the site monitors on how to properly conduct the visits and reviews and the use of the reports and maintain documentation of the training.

(Click) The last situation we will review that was a common review finding is training site personnel. During the review the Child Nutrition Specialist interviews site personnel and based on responses to the questions it’s clear the site personnel has not been trained. When asked to see the site personnel training documentation the sponsor responds that they don’t keep training documents.
Situation #4 is a finding. (Click) The sponsor failed to provide training to site personnel.

(Click) Sponsors are required to annually train all administrative staff and site staff before they undertake their responsibilities. The date, names of attendees, and documentation of the topics covered must be recorded and maintained for each training session offered.

(Click) Information on training requirements can be found in the SFSP Administrative Guidance for Sponsors Chapter 7 – Staff Duties and Training (Attachment 15 includes training checklists for training sessions).

Now lets discuss corrections that can be made to prevent this finding.

(Click) The sponsor would need to develop and implement a procedure for site personnel training. The procedure would need to include a system for tracking site personnel training and which staff will be responsible for conducting each training session. In addition, the procedure would need to include how staff hired after initial training (or volunteers that arrive after the initial training) will be trained. Documentation of all SFSP site personnel training must be maintained on file.
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Resources

- SFSP Administrative Guidance for Sponsors
- SFSP Monitor’s Guide
- SFSP Nutrition Guidance for Sponsors
- 7 CFR 225

http://www.ode.state.or.us/search/results/?id=208

(Click) All resources discussed during this training, including: the SFSP Administrative Guidance for Sponsors, Monitor’s Guide, Nutrition Guidance for Sponsors and 7 CFR 225 are all available on ODE CNP SFSP public website at the link included on the screen.

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Thank you for participating in Common Review Findings Training for the Summer Food Service Program. If you have any questions please contact your assigned Child Nutrition Specialist. We greatly appreciate the work that you do to fuel Oregon’s future.