

Summer Food Service Program and Seamless Summer Option

Integrity Plan Guidance

For specific use May through the end of summer

Program operators are required to maintain written procedures outlining plans to ensure program integrity to avoid duplication of meals served to a child in their meal service distribution area during the COVID-19 pandemic. The purpose for this document is to assist program operators in the development of standard operating procedures (**Integrity Plan**) for implementing the nationwide waivers.

This document lists some of the requirements program operators must collect and maintain to meet Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) requirements while implementing the nationwide waivers. This document also provides questions program operators should consider and answer when developing their Integrity Plan to avoid duplication of meals served to children in their SFSP or SSO meal service. The purpose of the Integrity Plan is to guide Sponsors through all of the scenarios they may face this summer and to put in writing how Sponsor staff should handle specific situations. State Agency Staff are happy to review your plans for thoroughness and may make suggestions for areas that may have not been addressed, but will not be approving any plan. Integrity Plans should be created and retained with program records. Both SFSP and SSO Sponsors should create an Integrity Plan if utilizing any of the nationwide waivers.

- Keep in mind the following requirements specific to program integrity:
- Regulatory preference is given to School Food Authority Sponsors when determining and approving open and bulk meal distribution sites.
 - Sponsors and State Agency staff must ensure that sites are not duplicating efforts in their attempt to serve meals in communities.
 - Open sites with daily meal distribution of nutritious foods made from scratch is highly encouraged over bulk shelf stable meals distributed once/per week.
 - SFSP/SSO Sponsors must plan and prepare meals to provide not more than 2 meals per day per child.
 - Adjustments must be made regularly in meal preparation to account for program participation fluctuation.
 - Sponsors should never overprepare just to have leftovers to donate or give out as extras.
 - Making use of commodities is a great way to lower food costs.
 - Providing children with healthy meals containing nutrient dense foods, fresh fruits and vegetables, and a variety of offerings within components is the goal of SFSP/SSO.
 - Program integrity plans should include:
 - Procedures as to how parent/guardians will be identified from other adults who are trying to pick up meals without children present
 - Detailed menu plans for bulk meal distribution, including meal components and serving sizes
 - Explanations as to how food will be labeled for consumption by children only
 - Evidence of staff training of program integrity plans

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #81 for SFSP</p> <p>Nationwide Waiver of Onsite Monitoring Requirements for SFSP Sponsoring Organizations</p> <p>Waives requirement that SFSP monitoring requirements be conducted on-site</p> <p>Now Expires: September 30, 2021</p>	<p>Sponsor normally conducts a preoperational review (for new sites), first week visit of program operation and fourth week visit of food service. The waiver allows Sponsors to waive the first week site visit and to conduct the 4 week site review as a desk review instead of an on-site review, when necessary.</p> <p>Note: While waiving the monitoring requirement of the first week, Sponsors are still encouraged to monitor the site through desk review and/or phone call. The four week review must still be conducted, preferably on-site, or as a desk review when necessary. Desk audit review documentation may include, but not limited to:</p> <ul style="list-style-type: none"> • scanned copy • picture • video <p>Sponsoring organizations should continue to record details of the off-site monitoring including, but not limited to:</p> <ul style="list-style-type: none"> • time and date the review was conducted • names and contact information of site staff that participated in virtual visit • technical assistance provided 	<ul style="list-style-type: none"> • Did the Sponsor conduct a preoperational review, if applicable? • Did the Sponsor conduct or waive the first week review for each operating site? Returning sites that did not have operating issues the previous year are automatically waived from the first week requirement for SFSP Sponsors. • Did the Sponsor conduct a full review of food service operations at each site sometime during the first four weeks of operation? • Did the Sponsor review meal count records? (Review meal counts for more than one day to ensure daily counts are being recorded.) • Did the Sponsor review menus and other food service records, such as production records or food inventory logs to ensure meal pattern compliance? • Did the Sponsor review meal delivery receipts if meals are vended? • Did the Sponsor review health and safety inspection documents? • Did the Sponsor verify display of And Justice for All poster? • Did the Sponsor verify income eligibility forms for camps, National Youth Sports Program and closed enrolled sites, if applicable?

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #59 for SFSP and SSO Extension</p> <p>Nationwide Waiver to Allow SFSP and SSO Operations through December 2020</p> <p>Allows the SFSP and NSLP SSO to continue to operate</p> <p>Now Expires: September 30, 2021</p>	<p>CNPWEB for 2020–21, should reflect current practices through the end of the school year. Remember that SNP PY 21 ends June 30th and PY 22 starts July 1.</p> <p>Update procedures to reflect current operations. Submit in CNPWEB and keep on file for administrative review.</p> <p>Requirements:</p> <ol style="list-style-type: none"> 1) To mitigate duplicate meals served at sites located in close proximity, work with surrounding districts, community sponsors, gov agencies, to eliminate overlapping service areas 2) Weekends and holidays service are permissible under current waiver 	<ul style="list-style-type: none"> • Did the Sponsor claim the SFSP and SSO meals in the correct program year for the correct operating months? • Is CNPWEB updated to reflect current operations for operating sites, serving days, mealtimes, and meal types? Include, weekends and holiday meal service, if applicable. • Did the sponsor work with surrounding SFSP and SSO agencies to eliminate the service of duplicate meals? • Does Sponsor Integrity Plan address limitations on meal distribution for serving bulk meals? • Does Sponsor Integrity Plan allow for households to take only the number of meals needed or does Sponsor require that households take all of the meals that are being distributed?
<p>COVID-19: Child Nutrition Response #77 for SFSP and SSO</p> <p>Nationwide Waiver to Extend Area Eligibility Waivers – EXTENSION 4¹</p> <p>Food and Nutrition Service extends the ability for states to continue operating sites in areas that are not located in “Areas in which poor economic conditions exist”.</p> <p>Expires: September 30, 2021</p>	<p>Requirements:</p> <ol style="list-style-type: none"> 1) Review plans with field specialist to ensure no duplication of meal service is taking place 2) Update CNPWEB 3) Update internal control procedures to ensure accurate meal counts and claiming (SFSP) <p>Note: Waives the requirement to collect and prove that a site serves in an area in which poor economic conditions exist.</p>	<ul style="list-style-type: none"> • Update site information in CNPWEB • Does the Sponsor have internal procedures to ensure accurate meal counts and claiming (SFSP/SSO)? • How are sites ensuring they are not duplicating meal service?

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #75 for SFSP and SSO Nationwide Waiver to Allow Noncongregate Feeding in the SFSP and SSO – EXTENSION 6 Allows for consumption of meals off site and outside of group settings. This allows for serving models like grab-n-go, curbside pick-up, mobile and bus routes, and home delivery. Expires: September 30, 2021</p>	<p>To support access to nutritious meals while minimizing potential exposure, Child Nutrition Program Operators can choose to serve meals outside of group settings like grab-n-go, curbside pick-up, mobile/bus routes, and home delivery etc.</p> <p>SFSP/SSO Closed enrolled: When using any of these options, update procedures to demonstrate that the meal service style ensures meals are claimed only for enrolled children by site and prevents duplicate meals.</p> <p>SFSP/SSO Open: When using any of these options, update procedures to demonstrate that the meal service style ensures meals are claimed for eligible children ages 1–18 by site and prevents duplicate meals.</p> <p>Requirements:</p> <ol style="list-style-type: none"> 1) Procedures to provide special diets to students as a result of medical disability. 2) Provide food safety information to families when multiple meals are served and not intended for immediate consumption. Provide instructions on portions and food safety. Ensure food items can be easily separated into meals with minimal preparation. 	<ul style="list-style-type: none"> • For an SFA offering meal distribution from alternative sites: <ul style="list-style-type: none"> ○ Did the SFA update the food and safety plans to make sure food is handled and served safely at the distribution sites and notify Health Department? ○ Are sites accurately listed and approved within CNPweb? ○ Does the SFA have records to show where the meals were distributed and be able to show that they were accurately counted and claimed? • Are there any students that require a special diet with a medical disability? <ul style="list-style-type: none"> ○ What is the process to provide children special diets? • Do the procedures include bulk pick up or delivery of meals to not exceed five days? • Is the And Justice for All poster visible to participants at all meal service locations? Not required for home deliveries. • Is there a system to accurately record meals served for meal service types (i.e., grab-n-go, curbside pick-up, and bulk pick-up)? • What is the meal count source document used at the point of service (POS)? • Is the source document maintained to support the claim for reimbursement?

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #75 for SFSP and SSO</p> <p>Nationwide Waiver to Allow Noncongregate Feeding in the SFSP and SSO – EXTENSION 6</p> <p>Allows for consumption of meals off site and outside of group settings. This allows for serving models like grab-n-go, curbside pick-up, mobile and bus routes, and home delivery.</p> <p>Expires: September 30, 2021</p>	<p>3) Update Hazard Analysis and Critical Control Points standard operating procedures to include state and local COVID-19 requirements (i.e., wearing masks, gloves, staying at least six feet apart, and social distancing). (SFSP/SSO)</p> <p>4) Update food safety procedures to include state and local COVID-19 requirements (i.e., wearing masks, gloves, staying at least six feet apart, and social distancing). (SFSP/SSO)</p> <p>5) May provide multiple meals, not to exceed five days at a time.</p> <p>6) And Justice for All posters must be visible at meal service facilities and locations. Best practice—display poster for all mobile routes.</p> <p>7) Grab-n-go, curbside pick-up, bulk pick-up, or mobile/bus routes and home delivery:</p> <ul style="list-style-type: none"> • System for recording meals served <ul style="list-style-type: none"> ○ Source documents for meal counts ○ Transport records by route (includes date of delivery and foods and number of meals delivered) <p>For Home Delivery Only: documented written consent and a food safety procedure required for delivering meals when household member is not present to receive meal(s).</p>	<ul style="list-style-type: none"> • Are menu records maintained to document the amount of food prepared to support the number of meals claimed for reimbursement? • Is there a mechanism to track who the parent or guardian has authorized to pick up meals on behalf of their children? • Is there documentation with student names and the number of meals served by meal type for mobile or bus and home delivery? • Is a household's written consent on file for home meal delivery to students? • For households that consent to receive food when no one is home, is only shelf stable food delivered?

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #76 for SFSP and SSO</p> <p>Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children – EXTENSION 6</p> <p>Allows parents or guardians to pick up meals for their child.</p> <p>Expires: September 30, 2021</p>	<p>When distribution of meals occurs without a child present, procedures must reflect the process by which program accountability and integrity are maintained. SFAs must be able to demonstrate the following:</p> <ul style="list-style-type: none"> • Meals are only distributed to <u>parents or guardians</u> of enrolled children (i.e., parents have children’s school identification cards) (SFSP/SSO Closed Enrolled). • Duplicate meals are not distributed or claimed. • Meal counts are recorded at the POS where distribution occurs and must be claimed by site for enrolled participants only (SFSP/SSO Closed Enrolled). • Meal counts are recorded at the POS where distribution occurs and must be claimed by site. <p>Note: Refer to requirements listed in the noncongregate feeding grab-n-go, curbside pick-up, and bulk pick-up meal service model for information</p>	<ul style="list-style-type: none"> • For meals picked up without eligible participants being present, is there a process to indicate that meals picked up are only for enrolled children? (SFSP/SSO Closed Enrolled) • What is the process to prevent duplicate meals from being distributed or claimed? • For OPEN sites, consider requiring a child to be present since the likelihood of knowing the adult picking up meals is rare

Summer Food Service Program and Seamless Summer Option Integrity Questions

<p>COVID-19: Child Nutrition Response #63 for SFSP and SSO Nationwide Waiver to Allow Meal Pattern Flexibility in the SFSP and SSO – EXTENSION 7 <u>With advance approval from field staff,</u> allows operators to claim for reimbursement even if a meal does not meet all meal pattern requirements or include all meal components. Expires: June 30, 2021 *Starting July 1, 2021, normal SFSP meal pattern requirements apply</p> <p>Child Nutrition Response #74 for SSO ONLY (also applies to SFSP sponsors who are following the NSLP meal pattern) Nationwide Waiver to Allow Meal Pattern Flexibility in the SSO - EXTENSION 9 Allows operators to claim for reimbursement if a meal does not meet all meal pattern requirements or include all meal components, <u>when approved on a case by case basis</u></p>	<p>Program operators must demonstrate meals served and claimed meet meal pattern requirements unless approved waivers for specific areas of deviations are obtained. Additional deviations from the meal pattern is allowed in the IDOE Meal Pattern Waiver Application.</p> <p>Requirements:</p> <ol style="list-style-type: none"> 1) Maintain waiver approval in Sponsor file for reporting and recordkeeping, <u>if granted by field specialist</u> 2) Waiver must include type(s) of specific areas of meal pattern deviations and justification: <ul style="list-style-type: none"> • Deviations must be specific and potentially could include—calories, fruit, juice, grain or whole grain-rich, milk, meat or meat alternate, vegetable, vegetable sub-groups, sodium • Justifications—Disruption in delivery, specific nationwide shortage, vendor closures, other 3) Maintain all documentation (i.e., menus, PR/food inventory, transport records, etc.) for all meals served and claimed. 4) Describe how staff identifies, counts, and records reimbursable meals. <p>Train staff on meal pattern and meal service requirements prior to the start of the meal service.</p>	<ul style="list-style-type: none"> • Is there an approved waiver from the IDOE for each specific area of meal pattern deviation? • Is all documentation maintained to support meal pattern requirements (i.e., menu production records [SSO only], menus, transport records, substitutions to planned menus, medical statements)? • Do the procedures describe how staff identifies, counts, and records reimbursable meals served? • Is the staff trained on meal pattern and meal service requirements if and when there is a meal pattern deviation?
---	---	---

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
Expires: September 30, 2021		
<p>COVID-19:</p> <p>Child Nutrition Response #80 (closed enrolled) Summer Food Service Program (SFSP) or Seamless Summer Option (SSO)</p> <p>Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in SFSP and SSO – EXTENSION 3</p> <p>Allows closed enrolled sites to determine site eligibility through area eligibility (instead of collecting income eligibility applications).</p> <p>Expires: September 30, 2021</p>	<p>Requirements:</p> <ol style="list-style-type: none"> 1) Update Site Eligibility Qualification (CNPWEB) 2) Review Meal Counting and Claiming Procedures 3) Update internal control procedures to ensure accurate meal counts and claiming (SFSP/SSO) 4) Proof of site targeting low income families 5) Any documentation that shows evidence of enrollment for children participating in the SFSP and SSO Closed Enrolled. <p>Note: Closed Enrolled SFSP and SSO—Waives the requirement to collect applications to determine site eligibility</p>	<ul style="list-style-type: none"> • Update site information in CNPWEB • Does the Sponsor have accurate procedures for documenting meal counts? • Did the Sponsor maintain documentation of the site eligibility and show proof of targeting low income families?

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #81 for SFSP Nationwide Waiver to Waive First Week Site Visits in the SFSP Waives requirement for first week site visit; applies to sites that successfully operated SFSP the previous year and, SFSP sponsors in good standing that successfully operate the Child and Adult Care Food Program (CACFP) or National School Lunch Program (NSLP). Expires: September 30, 2021</p>	<p>Sponsor conducts a preoperational review and first week visit of program operation by desk audit for all operating sites.</p> <p>Note: Waiver does not waive the monitoring of the first week review. In lieu of the in-person site visit, a first week review may be done as a desk audit. Desk audit review documentation may include, but not limited to:</p> <ul style="list-style-type: none">scanned copypicturevideo <p>Sponsoring organizations should continue to record details of the off-site monitoring including, but not limited to:</p> <ul style="list-style-type: none">time and date the review was conductednames and contact information of site staff that participated in virtual visitTechnical assistance provided	<ul style="list-style-type: none">Did the Sponsor conduct a preoperational review? If applicable.Did the Sponsor conduct first week review for each operating site? (A waiver may be approved by the IDOE for returning sites that were not problematic)

Summer Food Service Program and Seamless Summer Option Integrity Questions

Waiver	Sponsor Procedures and Documentation Requirements	State Agency Integrity Planning Prompting Questions
<p>COVID-19: Child Nutrition Response #78 for SFSP and SSO</p> <p>Nationwide Waiver of Meal Service Time Restrictions in SFSP and SSO – Extension 3</p> <p>Waives federal rule on the time between meal start times, and the duration of a meal service, and meal service time parameters.</p> <p>Expires: September 30, 2021</p>	<p>Program operators must establish meal service times or delivery times and serve meals at the locations and times entered in CNPWEB and approved by IDOE.</p> <p>Requirements:</p> <ol style="list-style-type: none"> 1) Report and update meal service times in CNPWEB. 2) If serving multiple meals and snacks together at the same time, meal counts must be recorded for each meal type. <p>Note: Claim only meal types allowed by regulations or through waivers and approved in the CNPWEB.</p>	<ul style="list-style-type: none"> • For SFSP/SSO: Is CNPWEB updated to reflect current operations for operating sites, serving days, mealtimes, and meal types in the appropriate programs?
<p>COVID-19: Child Nutrition Response #79 for SFSP</p> <p>Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the SFSP – EXTENSION 3</p> <p>Waives the limitation on the use of offer versus serve (OVS) to school food authorities (SFA). Allows the use of OVS by both non-SFA and SFA sponsors in good standing.</p> <p>Expires: September 30, 2021</p>	<p>Requirements:</p> <ol style="list-style-type: none"> 1) Update CNPWEB site application(s) 2) Sponsors must be trained in OVS requirements 3) Sponsor staff must be trained in OVS requirements 	<ul style="list-style-type: none"> • Do the procedures include serving all required meal components, if implementing OVS? • Is the CNPWEB site application updated to indicate the site is implementing OVS? • Has field staff verified Sponsor has met training requirements?

Summer Food Service Program and Seamless Summer Option Integrity Questions

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.), should contact the Sponsor (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at 800-877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (AD-3027) found online at <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (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.

This institution is an equal opportunity provider.