

SFSP Written Policy and Procedure Guidance

In accordance with 7 CFR 225.6(d), all sponsors must have written policies and procedures demonstrating compliance with the three performance standards: financial viability, administrative capability, and Program accountability.

Sponsor Administration Policies must detail how the sponsor will:

- Address cited violations from department of health inspection reports and maintain documentation of corrective action
- Address corrective action for SED site review findings and maintain documentation to support that all findings were corrected
- Ensure program meals are served at no charge
- Maintain SFSP data for at least three years plus the current year
- Operate in accordance with the approved SFSP agreement

Civil Rights Policies must detail how the sponsor will:

- Meet all Civil Rights requirements including:
 - Training all staff annually on civil rights
 - Documenting participation
 - Maintaining documentation of training including training resources used, sign-in sheet(s), date, location, and who provided the training
- Inform potential participants of the availability of the SFSP annually (public release, parent letter)
- Include the nondiscrimination statement, and instructions for filing a complaint, in the public release, parent letter and in any other program information
- Visibly display the current nondiscrimination poster at all sites and in the sponsor's office
- Ensure program information is available upon request
- Provide SFSP information in the appropriate translation when necessary
- Ensure that meals are served to all attending children and all children have equal access to meals
- Collect beneficiary data by racial/ethnic category for each site (by session for camp sites)

Sponsor Training Policies must detail how the sponsor will:

- Train all administrative and operational SFSP staff on operating the SFSP prior to site operations
- Provide training for staff brought on after program operations have started
- Provide regular updates to staff regarding any program changes that occur
- Ensure that at least one trained person is present at each meal service
- Complete staff evaluations and provide an opportunity for employee input

Sponsor Monitoring Policies must detail how the sponsor will:

- Complete required site monitoring for compliance:
 - Review each site at least once during the first four weeks of operation (or reviewing at least once if the site operates for less than four weeks)
 - Visit new and problem sites before the SFSP operates at the sites
 - Visit each site at least once during the first week of site operations (if not exempt)
- Resolve issues identified during monitoring

Food Service Policies must detail how the sponsor will:

- Adjust the number of meals ordered or prepared to meet the objective of serving only one meal per child per meal service
- Prepare quality meals in adequate quantity and meet meal pattern requirements
- Maintain production records that show that meals prepared meet meal pattern requirements

- Structure meal services within SFSP Standards and regulations (tray line, pre-plate, pre-set, family style)
- Set parameters for allowing (or prohibiting) the fruit/vegetable component to leave the site
- Provide a structure for implementing offer versus serve, if applicable
- Order, receive, account for, and maintain records of the receipt for USDA foods (if applicable)
- Maintain beginning and ending inventories to show the type, quantity, dollar value, and the total value of food (self-prep sponsors)
- Prepare and serve meals at the regularly scheduled mealtimes, as approved by SED and change scheduled times with SED when needed
- Notify SED of off-site meal service (field trips) and conducting offsite meal services within SFSP regulations
- Follow all applicable food safety regulations including:
 - Acquiring and maintaining the necessary health department permits/ Certificates
 - Evaluating site locations and equipment
 - Training staff on food safety

Meal Count Records Policies must detail how the sponsor will:

- Take accurate point of service meal counts
- Ensure original site meal count records by meal type are maintained for each site
- Maintain delivery receipts (for meals purchased via contract with a Food Service Management Company)
- Consolidate daily meal counts by meal type for each site by month to ensure accurate claiming process

Claims for Reimbursement Policies must detail how the sponsor will:

- Accurately calculate and apply a monthly meal allocation factor using the Program Worksheet for Camp Sponsors, Attachment 17 (for sponsors of camp sites that use a meal allocation factor to determine the number of meals to claim)
- Calculate and file accurate monthly claims for reimbursement in a timely manner

Financial Management Policies must detail how the sponsor will:

- Ensure accurate, current, and complete financial disclosure of SFSP financial records that can be made available for audit and review
- Hire and Maintain employees including:
 - Determining the need for employees
 - Approving positions
 - Determining rate of pay
 - Recruiting and evaluating candidates
 - Offering positions
 - Completing required paperwork for new employees
 - Establishing tracking and documentation for labor hours
 - Prorating labor applicable to the SFSP
 - Following all applicable labor laws
- Track the purchasing process including:
 - Receiving orders, inspecting and verifying goods, noting discrepancies on delivery receipts, and signing delivery receipts to indicate goods have been received
 - Verifying invoices with signed delivery receipts and purchase orders, ensuring that the amount invoiced is correct, and approving the invoice with a signature
 - Post invoice in accounting system (ledger), pay invoice and indicate paid on invoice

- Ensuring that invoices marked paid correspond to cancelled checks and bank statements (payments should be made on invoices, **not** statements)
- Ensure the efficient use of funds
 - All SFSP costs must be necessary, reasonable, authorized and not prohibited under federal, State or local laws and regulations
 - Credits, rebates and discounts must be subtracted from costs
- Establish and apply a reasonable method to prorate costs when the total cost is not applicable to the SFSP
- Appropriately charge indirect costs
- Deduct unallowable costs from operating cost including the cost of:
 - Meals served to non-eligible children or non-program adults when no corresponding income included as revenue
 - Meals served in excess of approved meal service when serving excessive seconds
- Calculate the cost allocation factor correctly and applied to operating costs, for sponsors of camp sites that use Attachment I 7
- Track and document all revenues
 - Source documentation must be maintained to support all costs such as procurement documentation, receiving reports, purchase invoices, credits, bills for vended meals, canceled checks, and payroll records
- Maintain a non-profit food service
 - SFSP reimbursement is solely used for non-profit food service operations
 - SFSP reimbursement is not used for the cost of meals served to non-eligible children when no income is received for the cost of these meals
 - Program reimbursement is not used for the cost of meals served to non-program adults when no income is received for the cost of these meals
 - All funds accruing to the account are properly identified and recorded as non-profit food service revenues
- Maintain a separate or commingled account
- Utilize a budget for the fiscal management and oversight of the SFSP
 - Outlays correspond with the budget
 - The quality of the meal service is maintained through proper management of Program resources
 - The sponsor has planned adequate resources to provide effective administration
 - Oversight and quality meal service for the children
 - Deviations or revisions from the approved budget (for sponsors required to submit a budget) are reported to SED for prior approval
- Ensure all SFSP funds are safeguarded and used efficiently for Program purposes
 - The authority to expend moneys is distinct and separate from the custody of these moneys
 - At least two individuals take part in each act of disbursing money
 - The custodian of funds and the accounting officer or auditor shall both report to the board or its designated representative regularly and independently
 - All accounts are audited at least annually
 - Prompt and careful examination and check of each receipt and each payment is made

Procurement Policies must detail how the sponsor will:

- Procure SFSP goods and services in compliance with procurement procedures in Part 200-Uniform Administrative Requirement, Cost Principles, and Audit Requirements for Federal Awards
- Document all aspects of each procurement (the rationale for the procurement method selected, contract type selected and basis for contract price must be documented)
- Govern the of performance of employees engaged in the award and administration of contract (no employee, officer or agent of the organization should participate in the selection, award, or administration of a contract if a conflict of interest, real or apparent would be involved)
- Set parameters for written specifications
- Ensure that purchases made are allowable, necessary, and reasonable to the SFSP
- Ensure integrity in the process to select vendors
- Ensuring free and open competition and integrity in the process to select vendors:
 - Contact at least 3 sources who are eligible, able and willing to provide the product or service to ensure all suppliers are on the same level playing field and have the same opportunity to compete

Food Service Management Company Contracts Policies must detail how the sponsor will:

- Determine how meals will be acquired
- Follow proper procurement procedures
- Determine provisions for extension(s)
- Ensure that the FSMC is providing meals (not management responsibilities)
- Ensure that meals supplied are at or below the SED approved meal service CAP
- Ensure that the sponsor receives any credits, rebates and discounts

Eligibility Policies must detail how the sponsor will:

- Maintain accurate rosters
- Ensure the correct income application and income guidelines are used
- Process income applications accurately and timely
- Maintain confidential documents in a secure location
- Supply appropriate school districts with rosters to validate eligible enrollees
- Determine and utilize other acceptable methods to qualify enrollees
- Notify parents of denial of benefits (camp sponsors)
- Update SED with actual eligibility figures by established deadlines

Audit Documentation Policies must detail how the sponsor will:

- Determine if a single or program specific audit is needed when sponsor expends \$750,000 or more in federal awards
- Submit A-133 audit to the Federal Clearinghouse
- Ensure the SFSP is properly identified as a federal program for audit purposes
- Ensure auditor recommendations are implemented regarding the SFSP

Non-Congregate Meal Service in a Rural Area Policies must detail how the sponsor will:

- Organize Meal Pick-Up:
 - Distribute meals only to children or to the parents or guardians of eligible children, and that duplicate meals are not distributed

- Ensure meal pattern requirements are met (unitized or bulk)
 - Ensure the appropriate number of meals are distributed (ex. multi-day issuance)
 - Ensure meal pickup times are followed as stated on the application approved by the State agency
 - Follow local health, food safety and sanitation standards
 - Ensuring 'And Justice for All' poster is properly displayed at pickup sites and civil rights requirements are met.
- Structure Home Delivery:
 - Obtain written consent from the eligible child's parent or guardian that the household wants to receive delivered meals
 - Maintain a record of how many children are eligible to receive meals in the home and how many meals were provided in each meal delivery
 - Obtain a MOU between the sponsor and the SFA for use of household eligibility information, if applicable
 - Ensure meal pattern requirements are met (unitized or bulk)
 - Ensure the appropriate number of meals are delivered (ex. multi-day issuance)
 - Follow meal delivery times as stated on the application approved by the State agency
 - Follow local health, food safety and sanitation standards
 - Ensure 'And Justice for All' poster is properly displayed on delivery vehicles and civil rights requirements are met
- Provide Bulk Meals:
 - Serve required food components in the proper minimum amounts for each reimbursable meal
 - Food items are clearly identifiable within the reimbursable meals.
 - Provide menus are with instructions indicating:
 - Which items are to be used for each meal and the portion sizes
 - Only minimal preparation is required, meaning that food is generally not being provided as ingredients for recipes that require chopping, mixing, or baking