



STATE WAIVER REQUEST FOR NATIONAL SCHOOL LUNCH PROGRAM (NSLP), SEAMLESS SUMMER OPTION (SSO), SUMMER FOOD SERVICE PROGRAM (SFSP), AND CHILD AND ADULT CARE FOOD PROGRAM (CACFP) MONITORING REQUIREMENTS

IDAHO STATE DEPARTMENT OF EDUCATION - CNP

1. State agency submitting waiver request and responsible State agency staff contact information:

Idaho State Department of Education (SDE) – Child Nutrition Program

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Boise, ID 83720

(208) 332-6819

2. Region:

Western Region

3. Eligible service providers participating in waiver and affirmation that they are in good standing:

Idaho State Department of Education, Child Nutrition Programs State Agency

4. Description of the challenge the State agency is seeking to solve, the goal of the waiver to improve services under the Program, and the expected outcomes if the waiver is granted. [Section 12(I)(2)(A)(iii) and 12(I)(2)(A)(iv) of the NSLA]:

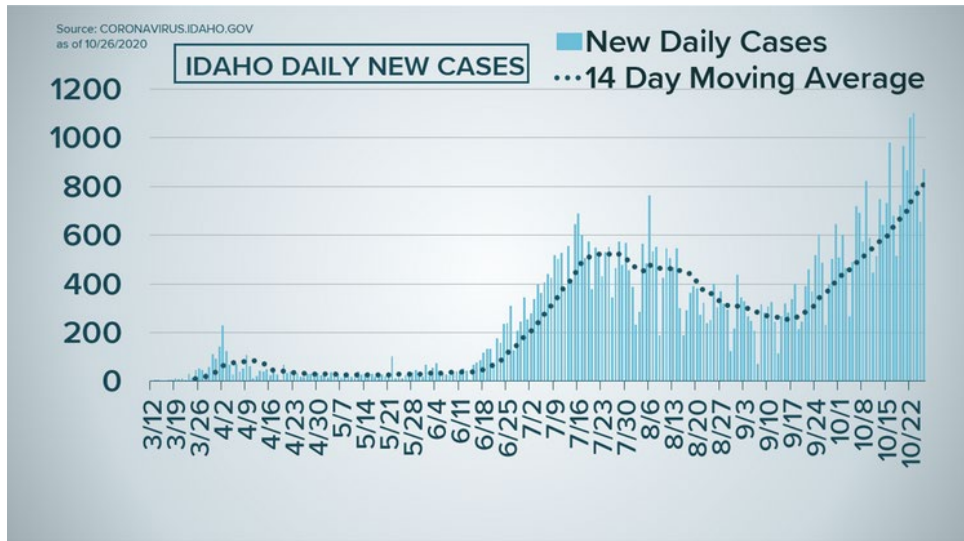
IDAHO COVID-19 DATA

Idaho Governor Brad Little and the Idaho Department of Health and Welfare issued a statewide Stay-Home Order on March 25, 2020, for all Idahoans. May 1, 2020, marked day one of the first of the four stages for Idaho to reopen during the



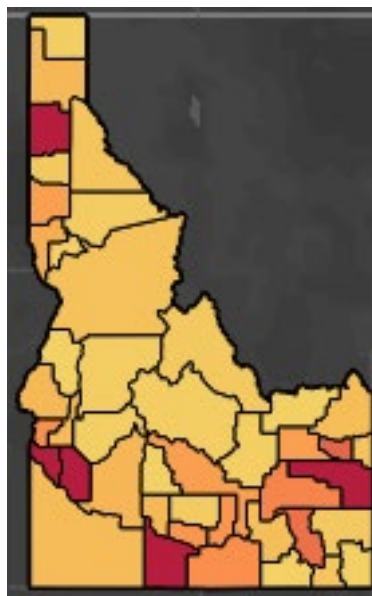
coronavirus pandemic. However, as of October 26, 2020, Idaho Governor Little imposed additional statewide restrictions due to a record-breaking increase in case numbers, which led to a significant strain on hospital capacity in multiple locations in Idaho.

The graph below shows the rise in number of cases in Idaho as of October 26, 2020.



ii [Idaho Daily New Cases](#)

The State Department of Education, CNP, is located in Ada County, which is currently considered a hotspot for cases in Idaho, with COVID-19 cases on the rise.



iii [Cases by County](#)



IMPACT ON NSLP MONITORING REQUIREMENTS

The Idaho CNP team sees two overarching difficulties with meeting review requirements for SY20-21.

1. The number of NSLP operators in SY20-21 is extremely limited, thus impeding the ability to conduct an adequate number of NSLP Administrative Reviews.
2. Two Years' worth of review activities will need to be conducted via desk audit due to restrictions on travel as a result of COVID-19.

Administrative Reviews

As a result of USDA permitting operation of the Seamless Summer Option (SSO) or Summer Food Service Program (SFSP) during SY20-21, the majority of Idaho sponsors are not operating under the National School Lunch Program (NSLP) during SY20-21. Currently, no Local Educational Agency (LEA) sponsors scheduled to receive an Administrative Review (AR) in SY20-21 are actually operating NSLP. With this being the case, conducting an AR on a program that is not operating is infeasible. While it may be possible to conduct a modified review of the SSO and SFSP sites currently operating in place of the NSLP, these review activities will not meet the full review requirements of each school food authority receiving an AR a minimum of once per approved AR Cycle. With USDA extending authorities to operate SSO/SFSP through June 30, 2021, the NSLP review schedule cannot be fulfilled in its entirety for the following reasons:

Currently, of the 35 NSLP Administrative Reviews that were previously scheduled for SY20-21:

- Three Residential Childcare Institutions (RCCIs) are operating NSLP
- Two School Food Authorities (SFAs) ceased operations for this school year due to COVID-19
- Twenty-one SFAs chose to operate the Seamless Summer Option
- Nine SFAs chose to operate the Summer Food Service Program

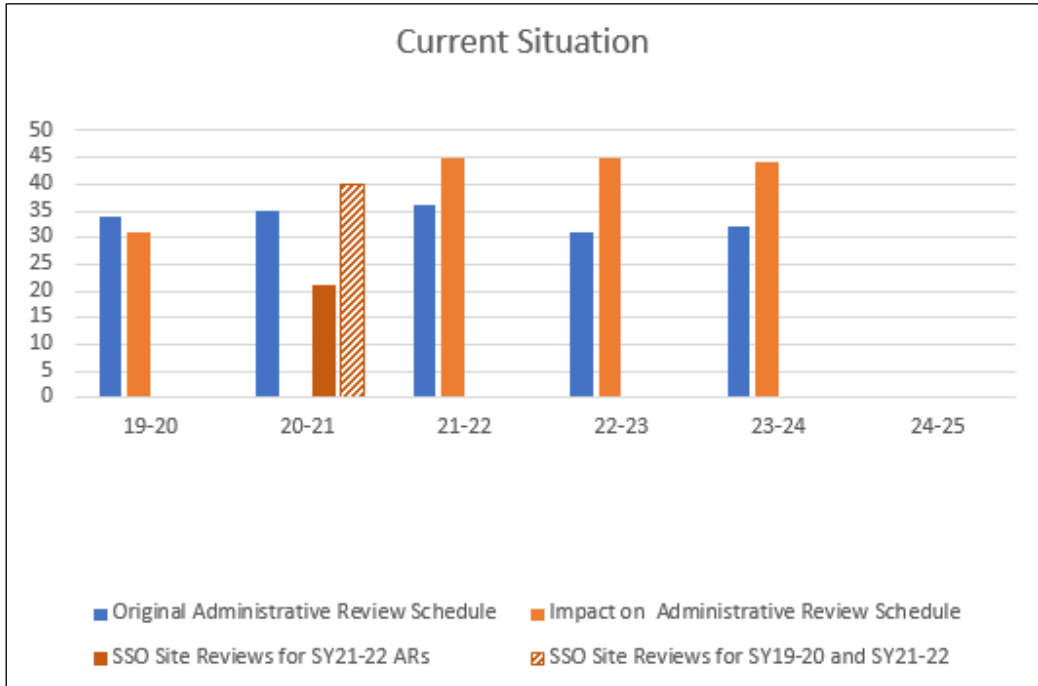
Ending SY19-20 during the COVID-19 pandemic caused a lot of stress on schools and created uncertainty around what staffing for school kitchens will look like and how the school day for SY20-21 will be managed for different LEAs across the state. In planning for ARs to be conducted during SY20-21 and summer 2021, the State agency (SA) is sensitive to the undefined realities faced by Program operators while evaluating how best to maintain program integrity. Considerations revolve around staff safety, fiscal impact, and administrative burden.

Planning to conduct only three SY20-21 NSLP ARs as desk reviews may limit safety

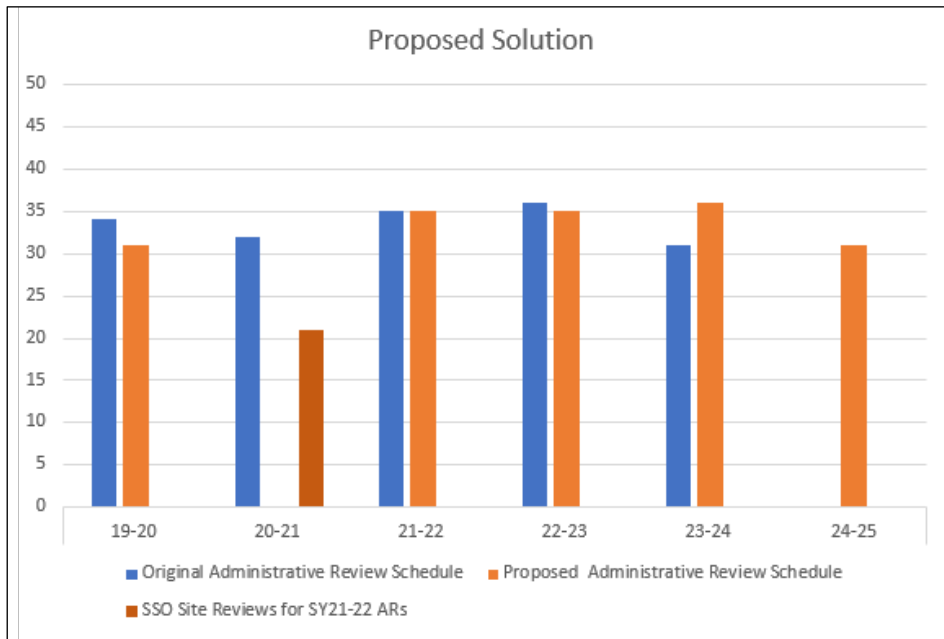


concerns, but increases fiscal impact and creates excess burden for both the SA and SFA by moving 32 reviews to subsequent years. During this public health emergency, the SA recognizes that alternative feeding operations are demanding. Local program operators need additional time and resources to meet these demands. Due to travel restrictions imposed by the Idaho State Department of Education, State agency staff are not permitted to visit sponsors operating child nutrition programs. Planning for off-site NSLP ARs is difficult for a variety of reasons. During the SY20-21, there are only three RCCIs operating NSLP that are scheduled for a review, one of which has already limited food service operations due to COVID for two weeks. The transmission rates of COVID-19 are extremely variable throughout the state of Idaho and the nation at-large. With this variability comes unanticipated SFA closures, SFAs opening utilizing a hybrid model, and attempts to integrate unique and changing school day models.

Without the approval of this child nutrition monitoring waiver request, the SA would need to shift the ARs that were previously scheduled for SY20-21 into the three remaining years of Idaho's approved 5-year review cycle. The ARs for both last year and next year would need to include an additional 42 SSO site reviews during SY20-21. Prior to SY19-20, there were no SFAs in Idaho that operated SSO. While the SFAs that operated SSO in the spring were responding to unanticipated school closures, those that are operating in SY20-21 need additional guidance on the appropriate way to operate SSO under USDA Nationwide Waivers. Based on anticipated funding and the previously approved five-year cycle waiver, Idaho initially identified the following schedule for ARs. The blue bar indicates the number of reviews initially anticipated under the five-year waiver and the orange bars indicate the impact on that schedule as a result of being unable to complete NSLP ARs in SY20-21. The red bars indicate the number of corresponding SSO reviews based on the AR cycle.



Idaho’s proposed solution is to implement a “gap year” in the previously approved five-year AR cycle. This gap year would be implemented by moving the previously scheduled SY20-21 ARs to SY21-22 for the remaining 32 sponsors. The end result would add one additional year to the overall AR cycle by shifting AR recipients into the subsequent school year from which they were previously scheduled. During SY20-21, SSO site reviews will be completed as desk reviews for all sponsors who are scheduled for a NSLP AR during SY21-22. The blue bars depicted in the graph below indicate the previous AR schedule, the orange bars illustrate the proposed shift in the cycle as a result of not conducting ARs in SY20-21 and the red bar depicts the number of SSO site reviews to be done in conjunction with the SY21-22 ARs.



One of the major goals of Idaho’s approved five-year waiver was providing more opportunities for technical assistance (TA) due to decreased numbers of annual reviews. This goal will be impossible to meet if there is no decrease in the number of reviews in future school years. Both time and financial constraints will limit reviewer availability to provide technical assistance visits should increase reviews be necessary to account for the ARs not conducted in SY20-21.

Historical data indicates a trend in decreased funding, which is expected to continue as meal counts in school meals may reach historic lows during the COVID-19 pandemic. The SA will experience financial hardship if the number of ARs to be conducted each year need to increase while funding is decreasing.

- Idaho SAE NSLP FY21 - \$799,120
- Idaho SAE NSLP FY20 - \$804,473
- Idaho SAE NSLP FY19 - \$807,579
- Idaho SAE NSLP FY18 - \$826,090

NATIONAL SCHOOL LUNCH PROGRAM: TOTAL LUNCHES SERVED					
Data as of May 8, 2020					
State/Territory	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Idaho	24,729,306	24,922,815	23,692,937	23,956,526	23,437,671
NATIONWIDE TOTAL	5,005,354,466	5,052,855,843	4,891,462,883	4,865,707,865	4,866,376,765

<https://www.fns.usda.gov/pd/child-nutrition-tables>



Need for USDA Waiver for On-Site Monitoring Requirements

Currently, Idaho is operating under an approved waiver to conduct reviews on a five-year cycle. During SY19-20, Idaho scheduled 33 reviews as part of the previously identified five-year review cycle. Due to the COVID-19 pandemic, 13 reviews scheduled during March and April were moved to desk reviews. Of those, three SFAs (23% of the desk reviews) identified concerns with having a desk review due to the burden of simultaneously shifting to an emergency feeding situation and providing documentation to the SA. These SFAs requested to have their ARs moved to the subsequent school year, hoping to return to standard operations prior to receiving a review. While these ARs will be conducted in SY21-22, the corresponding SSO Site Review will still need to be done in SY20-21. To accommodate sponsors concerns and ensure better oversight of modified program operations, the SA proposes to amend the USDA SSO Review Form with additional questions geared at program integrity.

While COVID-19: Child Nutrition Response #41 – Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs allows for off-site monitoring for SFAs and the SA, this poses challenges for both SFA and SA. With the variable schedules proposed by LEAs during the ongoing COVID-19 health crisis, the pressures put on SFA directors with staffing issues (e.g., staff not returning due to high-risk designation, COVID-19 diagnoses, quarantine, and directors filling in when these issues occur) reviewing schools during the pandemic is problematic and overly burdensome. Should the SA conduct reviews during SY20-21, the SA would not be conducting reviews of an SFA's normal protocols and standard operations. To address this concern, Idaho CNP proposes minor modifications to the standard USDA SSO review form. This modified form is attached to this request.

During the pandemic, Idaho conducted off-site reviews from SY19-20 that could not be completed on-site. It was determined off-site reviews are more time intensive and potentially less effective. Technology and communication barriers significantly impacted the SAs ability to provide one-on-one, in-person technical assistance (TA) to operators during the review. Some desk reviews were postponed due to the SFA's identified technology issues and time constraints related to the burden of scanning and uploading documentation needed for the desk audit. The SA experienced time delays while working to complete the ARs that proceeded as desk reviews starting March 2020. In one instance, the food service director uploaded all documentation as individual pictures, another scanned documents one at a time creating over 100 single page uploads. The SA reviewer had to open them individually and compile the files into groups before it was possible to evaluate the documentation. Often, food service directors do not have convenient access to the electronic devices required to scan and upload documents. The SA started the remote desk audit process in March 2020 and completed the final one in September due to identified constraints, fatigue of the process, and food service staff finalizing their typical responsibilities since most are not under contract from



June – August.

Food service employees are experiencing burn-out following the additional efforts put into planning and feeding children under the anticipated school closure model. SFA staff are stressed about the uncertainties of what feeding students will look like during the coming school year as well as potential budget impacts. Idaho has seen an increase in the number of food service directors choosing to retire or leave child nutrition programs; new directors will require substantial training to ensure they understand all the NSLP programs outside of nationwide waiver operations.

SSO Site Reviews

As a result of the federally declared public health emergency due to COVID- 19, all of Idaho's school districts were closed as of March 23, 2020 which resulted in the postponement of some ARs to the subsequent SY. Idaho CNP is currently operating under a five-year review cycle waiver, which began with SY19-20 and ends in SY23-24; a gap year would extend the end date of the waiver to SY24-25. The USDA released *COVID-19 Child Nutrition response #9*, which grants monitoring flexibility to all states nationwide. The flexibility to fully postpone an AR does not, however, include SFSP and SSO ARs. Only on-site monitoring requirements for these programs have been waived.

The Idaho CNP requests:

1. An exemption from the SSO review cycle requirement for SFAs who have completed an SY19-20 AR and who were serving their communities by operating SSO because of unanticipated school closures during spring 2020.
2. AR reviews postponed under this waiver request from SY20-21 will be moved to the SY21-22 review workload.
3. The SFAs that are currently operating SSO in SY20-21 who are scheduled to receive an AR in SY21-22 will receive an SSO Site Review in SY20-21.

This will impact approximately 21 SSO program operators in SY20-21. Additionally, the findings from the SSO reviews will be used for targeted technical assistance provided to other SSO operators.

As a part of current technical assistance efforts, the SA staff has been hosting bi-weekly webinars, town hall meetings, and developing infographics for sponsors. The Idaho SA would like to conduct targeted TA and off-site SSO reviews utilizing an amended SSO Review form (see attached) for the 21 SSO sponsors previously scheduled for a NSLP AR during the SY20-21. Additionally, Idaho SDE is requesting a waiver to place all NSLP AR reviews on hold during SY20-21 which included FSMCs in the original waiver, thus extending the five-year review cycle out one year. (FSMC (4 SFAs) contract extensions are reviewed annually by the SA and will have a higher level of scrutiny during their RFP process and contract renewal.) This approved waiver would allow moving NSLP reviews previously scheduled for FY21 to FY22;



FY22 moved to FY23; etc. This effort will allow time for operations to be more clearly defined, which will permit the SA to proceed with successful and beneficial ARs in SY21-22. Additionally, Idaho has 19 Provision 2 base year reviews that might need to be conducted in SY21-22 outside of the AR review schedule as clarified in SP 04-2021 Q&A#3 released on November 2, 2020.

Idaho installed, in summer 2020, a robust data analytic system in MyIdahoCNP to address fraudulent claiming issues. Idaho CNP now receives an automated claim report alerting staff if there are duplicate numbers entered in a sponsor's claim to address fraud. By completing the SSO/SFSP off-site reviews, Idaho hopes to establish whether issues arise frequently and address them throughout the state to correct problems before they become major issues.

Idaho will continue to conduct monthly webinars and hold Town Hall events to cover topics such as program monitoring, counting and claiming, and other topics identified during SFSP/SSO off-site reviews that may be areas of concern for program integrity. Idaho CNP took proactive measures by requiring sponsors to revise all program site application packets in MyIdahoCNP to ensure the applications reflect current operations and prohibit duplicate claiming.

While the scope of review (7 CFR 210.18(f)) does not include Afterschool Snack Program (ASSP) and Fresh Fruit and Vegetable Program (FFVP) during a SSO Review, Idaho is planning to include both the FFVP and the ASSP modules in the SSO Review to identify issues and provide TA to SFAs. This will help ensure the integrity of the programs during the COVID-19 pandemic, but will not preclude these programs from being reviewed during the Administrative Review.

IMPACT ON SFSP MONITORING REQUIREMENTS

Idaho SDE, Child Nutrition Programs scheduled 25 Summer Food Service Program (SFSP) administrative reviews as desk reviews for summer 2020. The State agency required SFSP sponsors to upload supporting documents as well as completing an online survey to replace portions of the on-site review section of the AR. For manual claim verification, the State agency identified the months of May and June to complete claim verification based on the high number of meals served during these two months. This timeline pushed the completion due date for Sponsor uploads and survey submissions to mid-July in order to allow sponsors who were dealing with the many moving parts of COVID-19 operations, time and flexibility to complete administrative review requirements. Additionally, the release of multiple extension waivers for SFSP operations increased State agency staff time to process the waivers and guide sponsors on the new flexibilities. This caused further delays in completing SFSP desk reviews.



During the desk reviews, the State agency found that many sponsors did not upload all necessary documents for the administrative review. This resulted in multiple email and phone communications between the State agency and sponsors for obtaining the rest of the review documents. The increased administrative review burden of conducting desk reviews is in addition to sponsors continuing to deal with COVID-19 operations, staffing concerns, staff and participant safety, and food procurement. Desk reviews for summer 2020 took much longer than expected, which affected other tasks and responsibilities for the State agency coordinators. The delay of completing the desk reviews increased labor cost for the State agency staff members.

IMPACT ON CACFP MONITORING REQUIREMENTS

All previously identified challenges also impacted CACFP monitoring requirements. Idaho has opted-in for the *Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the CACFP* to complete off-site program reviews. In Idaho, the SFSP coordinators assist with the CACFP reviews and if this waiver is not approved, it will impact the ability to complete the CACFP desk reviews. While only one CACFP flexibility is being requested through this state waiver request, approval of the SFSP waiver will facilitate successful completion of CACFP reviews.

The CACFP team is planning to conduct the six scheduled Independent Center meal observations virtually via Zoom or other platform depending on the Institutions resources. The unannounced site visit process will include the State agency contacting the site contact up to one hour prior to the meal service observation via telephone and emailing the site contact the link to the Zoom meeting so the State agency can observe the meal final preparation, set up and meal service. This process is similar to the State agencies normal onsite unannounced site visits since the State agency normally arrives at the site approximately thirty minutes prior to meal service to observe the final preparation and set up before meal service. Due to the above processes the State agency has set up, at this time, it is not necessary to request a waiver for site meal observations or unannounced site visits.

Idaho has one multi-state sponsoring organization that is headquartered in Idaho. The sponsoring organization is Lewis and Clark Early Childhood Program. Idaho state agency will maintain oversight of this organization as the cognizant state agency. The organization submitted a 2020-21 budget that was approved May 26, 2020. The organization does not have any shared cost with the State of Washington and does not have an approved indirect cost plan, nor does the sponsor charge any expenses under an indirect cost rate. The state agency will continue to monitor actual expenses quarterly.



5. Specific Program requirements to be waived (include statutory and regulatory citations). [Section 12(I)(2)(A)(i) of the NSLA]:

NSLP

7 CFR 210.18 Administrative Review

7 CFR 210.18(c) Timing of administrative reviews and cycle

7 CFR 210.18(f) Scope of review

7 CFR 210.19(a)(5) Food Service Management Company (FSMC) review cycle requirements.

This waiver is applicable to section 22(b)(1)(C)(i) of the NSLA, 42 USC 1769c(b)(1)(C)(i), and regulations at 7 CFR 210.18(c) which require State agencies to conduct administrative reviews of all school food authorities (SFAs) participating in the National School Lunch Program and School Breakfast Program at least once during a 3-year review cycle, provided that each SFA is reviewed at least once every 4 years. Idaho received a waiver to conduct reviews on a five-year schedule to lessen the AR burden on sponsors, so we are requesting this one time to extend the previously approved request.

7 CFR 210.18(e)(3)(ii) Site selection for other federal program reviews

National School Lunch Program's Seamless Summer Option. The State agency must review Seamless Summer Option at a minimum of one site if the school food authority selected for review under this section operates the Seamless Summer Option. This review can take place at any site within the reviewed school food authority the summer before or after the school year in which the administrative review is scheduled. The State agency must review the Seamless Summer Option for compliance with program requirements, according to the FNS Administrative Review Manual.

SFSP

Request to waive 7 CFR 225.7(d)(2)(ii)(D). Review each sponsor at least once every three years.

In order to meet the three-year review cycle for SFSP sponsors, the State agency would need to complete 27 SFSP sponsor reviews during FFY2021. *7 CFR 225.7(d)(2)(i)*, when the same school food authority personnel administer this Program as well as the National School Lunch Program (7 CFR part 210), the State agency is not required to conduct a review of the Program in the same year in which the National School Lunch Program operations have been reviewed and determined to be satisfactory. The State agency requests to utilize the completed NSLP administrative reviews from SY19-20 in order to eliminate six of the 27 SFSP reviews. While the SFSP review is not being conducted for these six SFSP sponsors, their



operations have been reviewed in the previous school year ensuring Program integrity. This will greatly reduce the administrative burden on the State agency while providing much needed relief to Program operators that received an NSLP review during the 19-20 school year. Additionally, this will enable the State agency to continue providing technical assistance and support to Program operators during these challenging times.

Request to waive 7 CFR 225.7(d)(2)(ii)(B) Annually review a number of sponsors whose program reimbursements, in the aggregate, accounted for at least one-half of the total program meal reimbursements in the State in the prior year.

The State agency requests to waive the requirement of reviewing half the aggregate amount of Program reimbursements from the previous year. Due to the COVID-19 pandemic, SFSP sponsors across Idaho transitioned to operating SFSP during the unanticipated school closures that occurred in March 2020. With the implementation of nationwide waivers allowing for flexibilities and maximum reach, program sponsors increased the number of feeding sites they operated in order to reach more children, and in turn served more meals than anticipated. In FFY2018-2019, sponsor reimbursement totaled 4.2 million dollars. Preliminary reports for FFY2019-2020 show this total exceeds 27 million dollars. In order to meet the 50% flow through requirement, the State agency would need to review 13 million dollars of sponsor reimbursement, which would extend the completion of administrative reviews into the following federal fiscal year. This requirement will create an additional burden to the State agency SFSP staff as well as Program sponsors. In Idaho, several SFSP sponsors receive biennial reviews, and one sponsor is reviewed annually, in order for the State agency to meet the annual 50% flow through requirement. Furthermore, because of this requirement, several sponsors receive administrative reviews for multiple Programs in one fiscal year. Operations under COVID-19 have increased sponsor fatigue and additional reporting requirements would further exacerbate this problem. Requiring Idaho to meet this percentage in FFY2021 would place undue hardship on the State agency and Program sponsors. Additionally, with the unknowns surrounding the pandemic, operations in the next calendar year may bring new challenges that the State agency and sponsors cannot anticipate. The State agency would ensure all sponsors receive a review within the three-year review cycle requirement, as well as reviewing any sponsor that had operational challenges in the previous year, and new sponsor(s).

CACFP

7 CFR 226.16(d)(4)(iii)(D) - not more than six months may elapse between reviews.

Idaho sponsoring organizations are requesting a monitoring requirement waiver of 7 CFR 226.16(d)(4)(iii)(D) - that not more than six months may elapse between reviews. Idaho state agency and sponsoring organizations (SO) will not conduct monitoring visits when a facility is temporarily closed and not serving meals due to



COVID-19. This may result in more than six months between monitoring visits. Sponsoring organizations will be able to comply with the remaining monitoring requirements through off-site virtual reviews.

6. Detailed description of alternative procedures and anticipated impact on Program operations, including technology, State systems, and monitoring:

With the unpredictability of the COVID-19 pandemic, availability and effectiveness of a vaccine or treatment, and uncertainty regarding the opening and scheduling of schools, Idaho would like to dedicate the time otherwise spent on NSLP review activities toward completing SSO Desk Reviews along with developing and conducting training via online methods to all SFAs in the state. If this request to move all remaining reviews back one year and extend the five-year waiver is approved, the FY20-21 year would be spent on enhancing online training and providing targeted technical assistance to sponsors via virtual platforms for new supervisors, as well as conducting targeted SSO reviews prior to the end of the SY21.

The State agency requests exemption from SFSP requirements listed in section 5. Under SFSP, there are no additional impacts on technology, State systems or monitoring.

7. Description of any steps the State has taken to address regulatory barriers at the State level. [Section 12(I)(2)(A)(ii) of the NSLA]:

There are currently no state-level regulatory barriers related to this specific issue.

8. Anticipated challenges State or eligible service providers may face with the waiver implementation:

Idaho SDE does not anticipate this waiver will present any challenges to the State agency, SFAs, or Program operators.

9. Description of how the waiver will not increase the overall cost of the Program to the Federal Government. If there are anticipated increases, confirm that the costs will be paid from non-Federal funds. [Section 12(I)(1)(A)(iii) of the NSLA]:

Idaho SDE does not anticipate that this waiver will increase the overall cost of the program to the Federal government. If this waiver is approved, the travel savings associated with completing ARs will decrease for SY20-21, however those savings will be absorbed in the same year by the costs for completing off-site SSO site reviews. Time and effort for off-site monitoring is substantially higher so the offset is anticipated. The budget in following years should not be impacted. If the waiver is not approved, the cost for on-site reviews will increase substantially



during the next three years as the SA will need to incorporate the SY20-21 reviews into the remaining three years.

10. Anticipated waiver implementation date and time period:

To be effective SY20-21 through SY24-25. Reviews scheduled for SY20-21 would be shifted to SY21-22, requiring all reviews in the five-year review cycle to be postponed by one year. Under NSLP, this waiver will be effective through July 31, 2025.

Under SFSP and CACFP, this waiver will be effective through September 30, 2021.

11. Proposed monitoring and review procedures:

SDE will continue to use the current monitoring forms from USDA for the AR. The SSO monitoring form has been adjusted, see attached.

12. Proposed reporting requirements (include type of data and due date(s) to FNS);

The NSLP 640 report will be submitted as required for all years. In addition, Idaho will report the training topics and training hours provided to SFAs along with and the number of TA virtual meetings provided during SY20-21.

Idaho SDE will submit SFSP data reports to Western Region as requested.

13. Link to or copy of the public notice informing the public about the proposed waiver [Section 12(l)(1)(A)(ii) of the NSLA]:

<https://www.sde.idaho.gov/re-opening/safety-wellness.html>

14. Signature and Title of requesting official:

Colleen Fillmore, Director
Child Nutrition Programs
Idaho State Department of Education
(208) 332-6823

Colleen Fillmore (electronic approval)



TO BE COMPLETED BY FNS REGIONAL OFFICE:

FNS Regional Offices are requested to ensure the questions have been adequately addressed by the State agency and formulate an opinion and justification for a response to the waiver request based on their knowledge, experience and work with the State.

Date request was received at Regional Office:

- Check this box to confirm that the State agency has provided public notice in accordance with Section 12(I)(1)(A)(ii) of the NSLA**

Regional Office Analysis and Recommendations:

SUPPLEMENTAL SEAMLESS SUMMER OPTION (SSO) ADMINISTRATIVE REVIEW FORM DURING COVID-19

[] 1ST REVIEW
 [] FOLLOW-UP # _____

Documents needed:

Waivers

Menu for October

Production Records for Week of 10/26

1 week meal count sheets

Monthly claim backup for October (sponsor and site)

Public Release – or plan for issuing one

Monitoring form – or plan for completing

Food Safety plan addresses pandemic feeding?

Training

Civil Rights complaint log and procedures

SFA LEVEL QUESTIONS	
SFA NAME:	

	Number of sites approved and operating under the Seamless Summer Option (SSO).		<u>Approved</u>	<u>Operating</u>
		Area Eligible (Open)		
		Non-Area Eligible (Open)		
		Closed		
1801.	Is the SFA operating any sites that were not approved? If YES, explain.	YES	NO	
Comments:				
1802.	Have there been any changes in the dates of operation from those approved? If YES, explain.	YES	NO	
Comments:				
1803.		YES	NO	

SUPPLEMENTAL SEAMLESS SUMMER OPTION (SSO) ADMINISTRATIVE REVIEW FORM DURING COVID-19

	During the time that the SFA is operating the SSO, are there any sites serving meals under the: a. ASSP?		
Comments:			
1804.	Does the SFA have an adequate system for documenting the number of meals served under the SSO separately from those served at non-SSO sites during the same claim period? If NO, explain. Describe the system for counting meals Describe the system for claiming meals.	YES	NO
			N/A
Comments:			
1805.	Has the SFA reviewed all SSO sites at least once during each site's operation? If NO, explain.	YES	NO
Comments:			
1806.	a. Did the SFA advertise the availability and location of free meals at all of its area eligible sites to the community? (Also site question 1825) b. Did all advertising materials used contain the required non-discrimination statement? If NO, explain.	YES	NO
Comments:			
1807.	Were reports submitted as required to the State agency? Claims (No Once in three year exceptions) Verification	YES	NO
Comments:			
1808.		YES	NO

SUPPLEMENTAL SEAMLESS SUMMER OPTION (SSO) ADMINISTRATIVE REVIEW FORM DURING COVID-19

	Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits? Where are they currently located?		
Comments:			

SITE LEVEL QUESTIONS	
SITE NAME:	

Site Agreement			
1809.	Is the site operating in accordance with provisions of the approved agreement for: a. Site Type? b. Meals Offered? <u>Waivers:</u> <ol style="list-style-type: none"> a. Is Waiver #59 to allow service through June 30, 2021 on file? b. Is Area Eligibility Waiver #60 on file? c. Is Waiver #61 to all non-congregate Feeding on file? d. Is Waiver #62 to allow Parents and Guardians to Pick-up on file? e. Is Waiver #63 to allow Meal Pattern Flexibility approved and on file? f. Is Waiver #64 to waive Area Eligibility for Closed Enrolled Sites on file? g. Is Waiver #66 to all Meal Time Restrictions on file? 	YES	NO
Comments:			

Site Eligibility			
1810.	Indicate which site type is being reviewed and answer the appropriate question in #1811. <input type="checkbox"/> Open <input type="checkbox"/> Closed		
1811.	<u>Open Site (Area Eligible):</u> Is proper documentation for area eligibility kept on file?	YES	NO
	<u>Open Site (Non Area Eligible):</u> Is proper documentation for area eligibility kept on file?		

SUPPLEMENTAL SEAMLESS SUMMER OPTION (SSO) ADMINISTRATIVE REVIEW FORM DURING COVID-19

Site Eligibility			
	<p><u>Closed Site:</u></p> <p>h. Is Waiver #64 to waive Area Eligibility for Closed Enrolled Sites on file?</p> <p>i. If 50% F/R requirement was satisfied through area eligibility, was proper documentation kept on file?</p>		
Comments:			

Meal Components and Quantities			
DAY OF REVIEW			
1812.	<p>Indicate which meal service is being observed reviewed</p> <p><input type="checkbox"/> Breakfast <input type="checkbox"/> Lunch <input type="checkbox"/> NSLP ASSP Snack <input type="checkbox"/> Supper</p>		
1813.	<p>Were all meals served and claimed for reimbursement only for eligible participants?</p> <p>If NO, explain in the comments section and record the number of ineligible meals on SSO S-1, line 6.</p>	YES	NO
Comments:			

SUPPLEMENTAL SEAMLESS SUMMER OPTION (SSO) ADMINISTRATIVE REVIEW FORM DURING COVID-19

1814.	<p>Were all required meal components available on every reimbursable meal service line to all participating students? Attach Production Records.</p> <p>a. Prior to the beginning of meal service? b. During the meal service? c. Is Waiver #63 to allow Meal Pattern Flexibility approved and on file? a. What was approved?</p> <p>If No to a or b, explain all errors identified and the technical assistance provided in the comments section.</p> <p>If the error was not corrected prior to the beginning of the meal service or if the meal service line did not offer all required components throughout the meal service, list the number of meal served in the applicable meal service line missing required meal components in the comments section. Combine this total with errors identified in #1815 and record on the SSO S-1, line 7.</p>	YES	NO	
Comments:				
1815.	<p>Did all observed meals production records match the meals counted for reimbursement and contain all of the required components?</p> <p>If NO, explain any errors identified and the technical assistance provided in the comments section.</p> <p>Record the number of meals observed missing required meal components in the comments section. Combine this total with errors identified in #1814 and record on the SSO S-1, line 7.</p>	YES	NO	
Comments:				
1816.	<p>Production Records</p> <p>For lunch/supper, are the minimum daily requirements of grains/breads, meat/meat alternate, fruits and vegetables met for the age/grade group being served?</p> <p>If NO, Is a waiver on file?</p> <p>If NO, list all the errors identified and the technical assistance provided. Indicate if the violations were repeat violations in the SFA.</p> <p>Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, line 8a.</p>	YES	NO	N/A
Comments:				

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1817.	<p><u>Production Records</u></p> <p>For breakfast, are minimum daily requirements of grains/breads, and fruits/vegetables met for the age/grade group being served.</p> <p>If NO, Is a waiver on file?</p> <p>If NO, If NO, list all the errors identified and the technical assistance provided. Indicate if the violations were repeat violations in the SFA.</p> <p>Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, line 8a.</p>	YES	NO	N/A
Comments:				
1818.	<p>a. Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines?</p> <p>b. If milk substitutions are made, are they allowable?</p> <p>c. Did the sponsor apply for Waiver #63 allowing Meal Pattern Flexibility in NSLP (which includes milk variety)</p> <p>If NO to a, b, or c, list all the errors identified and the technical assistance provided in the comments section. Indicate if the violations identified were repeated violations for the SFA.</p> <p>Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, line 8a.</p>	YES	NO	N/A
Comments:				
1819.	<p>Is Offer vs. Serve properly implemented?</p> <p>If NO, list all errors identified and the technical assistance provided. List the number of meals observed missing required meal components on SSO S-1, line 7. Record only the number of incomplete meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on SSO S-1, line 8a.</p>	YES	NO	N/A
Comments:				

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Meal Counting and Claiming			
DAY OF REVIEW			
1820.	Does each meal service line provide an accurate count at the point of service (or approved alternate)? If NO, describe the problem and indicate if the problem was non-systemic or systemic. Record differences on the SSO S-1, line 9 .	YES	NO
Site Count	SA Count	Difference +/-	
Comments:			

1821.	Is the meal count for the day of review comparable to the average meal count from the most recent 5 days? If NO, obtain the site's explanation and record in the comments section. Is the explanation consistent with conditions at the site?	YES	NO		
Day 1 Date:	Day 2 Date:	Day 3 Date:	Day 4 Date:	Day 5 Date:	Average Count

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822.	<p>a. If the site has an academic summer school, do the children in academic summer school participate in regular NSLP/SBP/ASCP?</p> <p>b. If YES, are SSO meals counted and maintained separately?</p>	YES	NO	N/A
				X
Comments:				
1823.	<p>a. If the site is a camp, are meals claimed only for children who have been approved for free/reduced price meals?</p> <p>b. If NO, explain and record the number of meals served to ineligible in the comments section. Combine this total with errors identified in #1813 and record on SSO S-1, line 6.</p>	YES	NO	N/A
				X
Comments:				

Meal Counting and Claiming				
Review Period				
Complete 1824 if counting and claiming problems are found in 1820 – 1823				
1824.	<p>a. For the review period, complete the chart on the SSO, S-1, line 13 below.</p> <p>b. Were the counts correctly used in the Claim for Reimbursement?</p> <p>c. If NO, explain and indicate if the problem was non-systemic or systemic. Record differences on the SSO S-1, line 13 below.</p>	YES	NO	N/A

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13. Meal Counting and Claiming Consolidation Counts and Errors	Breakfast			NSLP Lunch/Supper		
	School Count	SA Count	Difference (+/-)	School Count	SA Count	Difference (+/-)
	F:	F:	F:	F:	F:	F:
	R:	R:	R:	R:	R:	R:
	P:	P:	P:	P:	P:	P:
	T:	T:	T:	T:	T:	T:

Media Release			
1825.	Did the site provide a media release and/or promotional material to serviced areas? If NO, explain.	YES	NO
Comments: Attach Media Release			

Menu Planning Review Period			
1827.	Do production records, nutrient analysis and/or other supporting meal documentation for the last five operating days of the review period indicate that required meal components were available? Record the number of meals missing required meal components on the SSO S-1, line 11 . Do production records, nutrient analysis and/or other supporting meal documentation for the last five operating days of the review period indicate that required quantities were offered? Record the number of incomplete meals on the SSO S-1, line 12a or 12b . If FA is assessed for Dietary Specifications and includes the day of review indicate those meals in line 8b.	YES	NO
Comments:			

SUPPLEMENTAL SEAMLESS SUMMER OPTION (SSO) ADMINISTRATIVE REVIEW FORM DURING COVID-19

SFA Monitoring Responsibilities				
1828.	a. Was an on-site review conducted by the SFA at least once during the site's operation?	YES	NO	N/A
	b. Was corrective action of the meal counting, claiming, menu planning or food safety procedures required?			
	c. If deficiencies were identified during the site review, were actions implemented promptly to correct the deficiencies? If no deficiencies were found, mark NA.			
Comments:				

Civil Rights			
1829.	Is a USDA/FNS approved poster displayed in a prominent place and visible to recipients?	YES	NO
	Location?		
1830.	Are bilingual services (translators and materials) available for the Limited English Proficiency (LEP) populations?	YES	NO
1831.	a. Are procedures established to receive complaints alleging discrimination?	YES	NO
	b. Have there been any written or verbal complaints alleging discrimination? If no, proceed to question 1832.		
	c. If YES to b, have these complaints been reported to the State agency?		
1832.	Are Program benefits made available and provided to all children without discrimination on the basis of their race, color, national origin, sex, age, or disability?	YES	NO
1834.	Are children with special dietary needs provided program benefits as prescribed by regulations?	YES	NO
Comments:			

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Food Safety				
1835	a. Is a food safety program in place? b. Does the program follow USDA guidance? c. Do observations on the day of review indicate provisions of the food safety program are being implemented? If NO to a. b. and/or c., explain.	YES	NO	
1836	If the site is a school, did it receive two food safety inspections during the current school year? If NO, were two food safety inspections conducted in the previous school year?	YES	NO	N/A
1837	If the site is a school, is the most recent food safety inspection report posted in a publicly visible location?	YES	NO	N/A
Comments:				

Module: Water							
1838.	Is free potable water available to all students for lunch (in each location where lunches are served during the meal service) and for breakfast (when breakfast is served in the cafeteria)?	NSLP			SBP		
		YES	NO	N/A	YES	NO	N/A
Comments:							

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**Seamless Summer Option (SSO)
Administrative Review Form Instructions**

LEA/SFA LEVEL

Check [✓] if initial/first review or follow-up review and number.

Interview the individual(s) responsible for the administration of the Seamless Summer Option (SSO) and examine documents maintained by the SFA to answer the following questions.

1800. Determine and record the types and number of sites approved and operating the SSO under the administration of this SFA.
1801. Compare the names and locations of approved sites to those operating the program. Determine if any sites are operating that were not approved. If YES, record the site name and location in the Comments section.
1802. Determine if there have been changes in the dates of operation for any sites from the dates approved. If YES, explain in the Comments section.
1803. Determine if the SFA is serving meals under the NSLP ~~ASSP, SBP, and/or SFSP~~, during the same period as the operation of the SSO.
1804. Determine **based on interviewing the FSD** if the SFA has an adequate system for counting and claiming meals served under the SSO ~~separately from those served at non-SSO sites during the same claim period. If the SFA is only operating SSO sites, indicate N/A in the Comments section.~~ If the system is not adequate, answer NO and explain in the Comments section **the TA given to strengthen or change the system.**
1805. Determine if the SFA has conducted a review of each of its sites operating under the SSO at least once during the site's operation. If not all sites have been reviewed, answer NO and record the SFA's plans for conducting site visits in the Comments section.
1806. a. Determine if the SFA advertised the availability and location of free meals at area eligible sites to the community.
- b. Review the advertising materials used and determine if the required non-discrimination statement was included.
- If the answer to a and/or b was NO, explain in the Comments section.
1807. Determine if the SFA prepares and submits reports as required. **Were all Claims submitted on time? Did they collect applications and start/complete Verification**
1808. Determine if the SFA is retaining the appropriate records regarding program management for 3

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years after the final Claim for Reimbursement for the fiscal year or until resolution of any audits.
Upon Interviewing the FSD, where are the records currently located?

SITE AGREEMENT

1809. Observe site and confirm the site type, meals offered, **waivers approved to operate** and meal service times that are approved. Record any discrepancies in the Comments section.

SITE ELIGIBILITY

1810. Indicate which type of site is being reviewed.

1811. Open Site

If the site is operating based on area eligibility, obtain all of the eligibility documentation (e.g., school data or census data, as approved by the State agency). Review and evaluate eligibility determination for completeness and accuracy. Answer YES if area eligibility was determined correctly and kept on file. If determination of area eligibility was incorrect and/or not kept on file, answer NO and explain in the Comments section.

Closed Enrolled Site

- a. ~~If the site is an enrolled site, obtain all of the eligibility documentation (applications and direct certification). Review and evaluate eligibility determination for completeness and accuracy. Indicate if the application approval process is implemented correctly. Answer YES if all eligibility determinations were made correctly~~ **a waiver was requested for Closed Enrolled Sites**. If any errors are noted, answer NO. Record all discrepancies on the Certification Error Worksheet, SSO S-2.
- b. ~~Review and evaluate if the applications indicate that 50% or more of the enrolled population, based on the reviewer's count of correctly approved applications/direct certification, is eligible for free or reduced priced meals. If 50% or more of the enrolled population is eligible for free or reduced priced meals, answer YES. If the enrolled population does not equal 50% or more eligible for free or reduced, answer NO.~~

~~If approval errors were identified in a, or the free and reduced enrollment did not equal 50% or more in b, explain in the Comments section.~~

~~Record errors on the Certification Error Worksheet, SSO S-2. If the SSO review is conducted in conjunction with the Administrative Review, do NOT include applications that are used exclusively for the Seamless Summer Option on the School Certification and Benefits Issuance Error Worksheet, SFA-1. With the waiver, applications are not necessary during COVID-19~~

Migrant Site

~~If the site is a migrant site, obtain all of the eligibility documentation (i.e., migrant certification). Review and evaluate eligibility determination for completeness and accuracy. Answer YES if the site's eligibility was determined correctly and kept on file. If site's eligibility was determined incorrectly and/or not kept on file, answer NO and explain in the Comments section.~~

Camp

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~~If site is a camp, obtain all of the eligibility documentation (applications and direct certification). Review and evaluate eligibility determination for completeness and accuracy. Indicate if the application approval process is implemented correctly. Answer YES if all applications are approved correctly. If any errors are noted, answer NO and explain in the Comments section. Record all discrepancies on the Certification Error Worksheet, SSO S-2. Do NOT include applications that are used exclusively for the Seamless Summer Option on the School Certification and Benefits Issuance Error Worksheet, SFA-1.~~

~~For Camps and Enrolled Sites ONLY:~~

~~—Indicate if all certifications or a statistically valid sample of certifications are reviewed. If using a statistically valid sample, indicate the confidence level, the universe, and the sample.~~

DAY OF REVIEW MEAL OBSERVATION

1812. Indicate which meal service(s) is being reviewed.

(NSLP ASSP) and (CACFP Suppers) were added

1813. ~~Observe the meal service and~~ determine if all meals were served and claimed for eligible participants only **using the interview of the FSD**. Examples of ineligible participants include individuals over the age of 18 (except at migrant sites) and children who received and were claimed for a second meal.

If meals were served to ineligible participants and claimed for reimbursement, explain and record the number of ineligible meals on SSO S-1, **line 6**.

1814. Evaluate prior to the meal service if all required meal component are creditable and available. The site should be advised and given the opportunity to add any missing meal component before the meal is served. If the missing meal component is added, check [✓] YES but record the deficiency and technical assistance which was provided in the Comments section. The reviewer must observe that meal components are creditable and available throughout the meal service for each serving line, if applicable. If all meal components are available, answer YES. A NO answer is required if a required meal component is not creditable or is not available. If the site did not have all the required meal components available on each serving line, describe the problem and record the number of non-reimbursable meals in the comments section. Combine this total with errors identified in #1815 and record on SSO S-1, **line 7**.

Has the SFA applied for a Meal Pattern Waiver? What was approved? (put in comments section)

1815. ~~Observe and~~ indicate if all meals counted for reimbursement **using production records** contain the required number of meal components based on the written menu and/or other supporting documentation such as production records, standardized recipes, food labels, etc. If the reviewer observes one or more meals counted as reimbursable which were missing one or more required meal components, a NO answer is required **unless a Meal Pattern Waiver for that food group was approved**. If a ~~child did not take the number of items required for a reimbursable meal~~ **was not provided**, those meals must be recorded as non-reimbursable ~~due to observation~~. Record the number of meals counted as reimbursable which were missing one or more required components in the comments section. Combine this total with errors identified in #1814 and record on SSO S-1, **line 7**.

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1816. Determine if the daily meal component requirements for grains/breads, meat/meat alternate, fruits, and vegetables are met for the age/grade group being served for NSLP, per 7 CFR Part 210.10. **If NO, is a waiver on file?** If NO, explain all errors identified and the technical assistance provided. **Indicate if the violations identified were repeat violations for the SFA.** Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, **line 8a.**
1817. If reviewed, determine if the daily meal component requirements for grains/breads, fruits, and vegetables are met for the age/grade group being served for SBP, per 7 CFR Part 220.8. **If NO, is a waiver on file?** If NO, explain all errors identified and the technical assistance provided. Indicate if the violations identified were repeat violations for the SFA. Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, **line 8a.**
1818. a. Determine if at least two required milk varieties are available throughout the serving period on all meal service lines.
- b. If substitutions are made, evaluate whether the substitutions were allowable per 7 CFR Part 210.10. If NO, explain all errors identified and the technical assistance provided. Indicate if the violations identified were repeat violations for the SFA.
- c. Did the sponsor apply for Waiver #63 allowing Meal Pattern Flexibility (which includes milk variety)**
- Record only the number of incomplete meals counted for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, **line 8a.**
1819. **If the SFA is operating OVS,** evaluate whether the ~~cashier~~ **FSD or person putting meals together** demonstrates a clear understanding of OVS and its requirements. For any instances where meals were claimed for reimbursement that were missing required meal components, record the total in the comments section. This includes meals where the required minimum amount of fruits or vegetables is not selected. Combine this total with errors identified in #1814 and #1815 and record on the SSO S-1, **line 7.** For any instances where meals were claimed for reimbursement that were incomplete due to required meal components being selected in insufficient portion sizes (not including the required $\frac{1}{2}$ cup F/V), record only those meals claimed for reimbursement that will be subject to fiscal action in the appropriate field on the SSO S-1, **line 8a.** For instances where a student has selected a reimbursable meal, but is made to select an additional item(s), record the error(s) in the comments section and provide technical assistance to ensure Offer vs. Serve is properly implemented in the future.

DAY OF REVIEW COUNTING AND CLAIMING

1820. Observe how the meal counts are obtained from each point of service, if applicable, and combined for the site's total meal count. Record the site's counts. Validate the meal count and record as the SA's Count for Day of Review. Calculate the difference and determine if the procedures used by the site were accurate. If there were differences between the site's count

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and the reviewer's count, the question must be answered NO. Record any differences on the SSO S-1, **line 9**.

1821. Obtain the average meal count for the meal service that was observed from the previous five (5) operating days and compare it to the day of review count. Evaluate the counts and indicate if an unreasonable shift occurred in the total count from the most recent five (5) serving days to the day of review. Enter the date and the site's count for the meal service observed from the previous five (5) operating days in the Comments section. Enter the average meal count by adding all five (5) operation days together and dividing by 5. If the meal counts are not comparable, then obtain an explanation. Determine and indicate if the explanation is consistent with conditions at the site.
1822. ~~N/A a. If the site operates an academic summer school, determine if the children participate in the regular National School Lunch Program (NSLP), School Breakfast Program (SBP) or After School Care Program (ASCP). If the site does not operate an academic summer school, indicate N/A in the Comments section.~~
~~b. If the site does operate an academic summer school, determine and indicate whether the site's procedures for counting seamless summer meals are maintained separately from the regular NSLP, SBP and ASCP meals. If the review of the meal counting system shows that meals are not counted and maintained separately, answer NO and describe the problem in the Comments section.~~
1823. ~~N/A a. If the site is a camp, determine and indicate whether the site only claims meals for enrolled children that are eligible for free or reduced priced meals based on an approved application or direct certification documentation kept on file. If the site claims meals for children that do not qualify for free or reduced priced meals or do not have meal applications or direct certification documentation to support their claims, answer NO.~~
~~b. If NO, explain and record the number of meals served to ineligibles in the comments section. Combine this total with errors identified in #1813 and record on SSO S-1, **line 6**.~~

REVIEW PERIOD COUNTING AND CLAIMING

1824. Answer this question if counting and claiming problems were found in 1820-1823.
- a. For the review period, complete the chart on the SSO S-1, **line 13**. Record the site's counts by meal type for the review period, the SFA's count by meal type for the review period for the Claim for reimbursement, and the State agency count for the review period in the grid provided. If the validated count is different than the site reported count, investigate and determine if the SFA correctly claimed meal counts for this site. If the validated count is different from the SFA claim for this school, record the difference.
- b. Answer YES if the validated count matches the SFA's claims for this site. If the validated meal counts did not match the SFA's claimed counts, answer NO and describe the problem.
- c. If NO, explain and determine if the causes are nonsystemic or systemic. Record differences on the SSO S-1, **line 13**.

MEDIA RELEASE

1825. Review and describe the media release and/or promotional material provided by the LEA/site for the serviced areas.

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If the LEA/site did not supply a media release, explain in the Comments section.

N/A FREE AND REDUCED PRICE PROCESS – CAMP SITES ONLY

Check [] N/A if this site is not a Camp.

~~1826. Observe and evaluate the meal count/collection system to ensure that there is no overt identification of free meal recipients.~~

MENU PLANNING

1827. Review the school's documentation and procedures, such as production records and nutrient analysis records for the last five operating days for the review period to determine if meals contain all required meal components. Record the number of meals missing required meal components on the SSO S-1, **line 11.**

Review the school's documentation and procedures, such as production records and nutrient analysis records for the last five operating days for the review period to determine all required meal quantities were offered.

Record the number of meals incomplete meals on the SSO S-1, **line 12a and 12b.** **If FA is assessed for Dietary Specifications and includes the day of review indicate those meals in line 8b.**

MONITORING RESPONSIBILITIES

1828. a. Examine the documentation for the site to determine if the SFA monitored the site's compliance with meal counting, claiming, menu planning, and food safety requirements at least once during the site's operation. If the SFA has not monitored the site during the current summer, explain why the site has not been reviewed in the Comments section.
- b. Determine if there were errors in the meal counting, claiming, menu planning or food safety procedures for the reviewed site that required corrective action. Indicate N/A in the Comments section if "a" is answered NO.
- c. Examine documentation to determine if actions were implemented promptly to correct the deficiencies. Indicate N/A in the Comments section if "a" is answered NO.

CIVIL RIGHTS

1829. – 1834.

Determine, based on the answers to the questions in this section, if program benefits are made available and provided to all children without discrimination on the basis of their race, color, national origin, sex, age, or disability, and that the SFA seeks to reach all portions of the population.

FOOD SAFETY AND SANITATION

1835. a. Review documentation to determine if a food safety program is in place at the site.
- b. Determine if the food safety program follows the USDA guidance.
- c. ~~Determine if observations on the day of review indicate~~ **Describe** the food safety program is being implemented ~~as planned~~ at the site (HACCP).

~~If NO to a, b, and/or c,~~ explain in the Comments section **the food safety program.**

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1836. a. If the site being reviewed is a school, examine documentation from food safety inspections. Answer NO if less than two food safety inspections are available for the current school year. Answer YES if the site has received two food safety inspections in the current school year. Record the dates of the inspections in the Comments section. If site is not a school, indicate N/A.
- b. If the school site did not have two food safety inspections in the current school year, determine if the site had two food safety inspections in the previous school year. Answer YES, if the site has received two food safety inspections in the previous school year. Record the dates of the inspections in the Comments section. Answer NO if less than two food safety inspections were conducted in the previous school year. Document actions taken by the SFA to request food safety inspections from the state or local food safety inspection authority.
1837. Determine if the most recent food safety inspection report is posted in a publicly visible location.

WATER AVAILABILITY

1838. Determine if water is available to participants. N/A can only be checked for lunch if site is a non-school site.

TECHNICAL ASSISTANCE

If sponsor is operating ASSP or FFVP, use the AR forms for these programs and provide TA when concerns are identified. Keep copies of all completed forms and attachments for the AR scheduled for SY 21-22.