California Department of Education

Nutrition Services Division

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Page **1** of **10**

# 2022 Seamless Summer Option and Summer Food Service Program Integrity Questions

Program operators are required to maintain written procedures that outline plans to ensure program integrity and meals are served only to eligible children and avoid duplication of meals during their meal service distribution. The purpose for this document is to assist program operators in the development of their standard operating procedures (Integrity Plan) for implementing the approved stated waivers. For each waiver elected to use, Program Operators must opt-in by completing the online waiver election application at: <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.

This document lists some of the required documents program operators must collect and maintain to meet Seamless Summer Option (SSO) or Summer Food Service Program (SFSP) requirements while implementing the approved state waivers. This document also provides prompting questions program operators should consider and answer when developing their Integrity Plan to avoid duplication of meals served to children in their SSO or SFSP meal service.

| **Waiver** | **Agency Procedures and Documentation Requirements** | **Integrity Planning Prompting Questions** |
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| COVID–19: Child Nutrition Response #111  **Nationwide Waiver to Allow Non-Congregate Feeding for Summer 2022 Operations – EXTENSION 7 (SFSP/SSO).**  Allows for consumption of meals off site and outside of group settings. This allows for serving models like grab-n-go, and curbside pick-up only when congregate meal service is limited due to COVID-19.  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** July 6, 2022  **Expires:** September 30, 2022 | To support access to nutritious meals when congregate meal service is limited by COVID-19.  **SSO/SFSP Closed enrolled:**  When using any of these options, update written procedures to demonstrate that the meal service style ensures meals are claimed only for enrolled children by site and prevents duplicate meals.  **SSO/SFSP Open:**  When using any of these options, update written procedures to demonstrate that the meal service style ensures meals are claimed for eligible children ages 1–18 by site and prevents duplicate meals.  **Requirements:**   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. | * Are there any students that require a special diet with a medical disability?   + What is the process to provide children special diets? * Do the written procedures include bulk pick up or delivery of meals to not exceed seven days? |
| COVID–19: Child Nutrition Response #111  **Nationwide Waiver to Allow Non-Congregate Feeding for Summer 2022 Operations – EXTENSION 7 (SFSP/SSO) continued.**  Allows for consumption of meals off site and outside of group settings. This allows for serving models like grab-n-go, and curbside pick-up only when congregate meal service is limited due to COVID-19.  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** July 6, 2022  **Expires:** September 30, 2022 | **Requirements continued:**   1. 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). (SSO) 2. **And Justice for All** posters must be visible at meal service facilities and locations. Paper copies and 2015 poster may be used. (Best practice—display poster for all mobile routes). 3. Grab-n-go, curbside pick-up, or bulk pick–up  * System for recording meals served   + Source documents for meal counts   + Transport records by route (includes date of delivery and foods and number of meals delivered)   + MPR for SSO only   **For Home Delivery Only:** documented written consent prior to delivering meals, and a food safety procedure required for delivering meals when household member is not present to receive meal(s). | * 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? * Are menu records maintained to document the amount of food prepared to support the number of meals claimed for reimbursement? * 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? |
| COVID–19: Child Nutrition Response #112  **Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children for Summer 2022 Operations – EXTENSION 7 (SFSP/SSO).**  Allows parents or guardians to pick up meals for their child when meal service is limited due to COVID-19.  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** July 6, 2022  **Expires:** September 30, 2022 | To support access to nutritious meals when congregate meal service is limited by COVID-19.    **Requirements:**  Written procedures must reflect the process by which program accountability and integrity are maintained. SFAs must be able to demonstrate the following:   1. Meals are only distributed to parents or guardians of enrolled children (i.e., parents have children’s school identification cards) (SFSP Closed Enrolled, SSO Closed Enrolled). 2. Duplicate meals are not distributed or claimed. 3. Meal counts are recorded at the POS where distribution occurs and must be claimed by site for enrolled participants only (SFSP Closed Enrolled, SSO Closed Enrolled). 4. Meal counts are recorded at the POS where reimbursable meals are identified and served.   **Note:** Refer to requirements listed in the non-congregate feeding grab‑n‑go, curbside pick-up, and bulk pick-up meal service model for information. | * 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 Closed Enrolled, SSO Closed Enrolled) * What is the process to prevent duplicate meals from being distributed or claimed? * Is there a mechanism to track who the parent or guardian has authorized to pick up meals on behalf of their children? |
| **COVID-19: Waiver for the First Week Site Visits in the SFSP Requirement**  The USDA waived the requirement for  SFSP operators to visit each of their  sites at least once during the first week of operation. Program operators must be in good standing and are still required to conduct a full review of food service operations at each site within the first four weeks of operations, as well as maintain a reasonable level of site monitoring.  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** May 1, 2022  **Expires:** September 30, 2022 | 1. REQUIRED: Agency must conduct a preoperational review for all new and problematic sites. 2. REQUIRED: First week site visit must be conducted for problematic sites. **Note:** First week site visits are waived for sites operating in good standing. 3. REQUIRED: A site review must be conducted by the fourth week of operation regardless of number of days operating. | * Did the agency conduct a preoperational review for new and problematic sites? * Did the agency conduct a first week site visit for problematic sites? * Did the agency conduct a fourth week site review? |
| **COVID-19: Waiver of Onsite Monitoring Requirements for SFSP Sponsoring Organizations**  Waives requirement that SFSP monitoring requirements be conducted on-site  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** July 18, 2022  **Expires:** September 30, 2022 | Agency conducts a preoperational review, first week visit of program operation and fourth week visit of food service operation to be reviewed by desk audit for all operating sites.  **Note:** Waiver does not waive the monitoring of the first week and the fourth week review. In lieu of the in-person site visit, a first week review and fourth week review may be done as a desk audit. Desk audit review documentation may include, but not limited to:   * A scanned copy * Picture(s) * Video(s)   Sponsoring organizations should continue to record details of the off-site monitoring including, but not limited to:   * The time and date the review was conducted * The names and contact information of site staff that participated in visit  1. Technical assistance provided | * Did the agency conduct a preoperational review? If applicable. * Did the agency conduct first week review for each operating site? (A waiver may be approved by the California Department of Education [CDE] for returning sites that were not problematic) * Did the agency conduct food service operations at each site during the first four weeks of operation? * Did the agency review meal count records? (review meal counts for more than one day to ensure daily counts are being recorded) * Did the agency review menus and other food service records (such as production records if used to ensure meal pattern compliance)? * Did the agency review meal delivery receipts? * Did the agency review health and safety inspection documents? * Did the agency verify **And Justice for All** poster displayed? * Did the agency verify income eligibility forms for camps, National Youth Sports Program and closed enrolled sites if applicable? |
| COVID–19: Child Nutrition Response #113  **Nationwide Waiver of Meal Service Time Restrictions for Summer 2022 Operations – EXTENSION 4 (SSO/SFSP).**  Waives federal rule on the time between meal start times, and the duration of a meal service, and meal service time parameters.  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** July 6, 2022  **Expires:** September 30, 2022 | Program operators must establish meal service times or delivery times and serve meals at the locations and times entered in CNIPS and approved by CDE.  **Requirements:**   1. Report and update meal service times in CNIPS. 2. Update in the written procedures. 3. If serving multiple meals and snacks together at the same time, meal counts must be recorded for each meal type.   **Note:** Claim only meal types allowed by regulations or through waivers and approved in the CNIPS. | * Is CNIPS updated to reflect current operations for operating sites, serving days, mealtimes, and meal types? * Have the updated written procedures for current operations been submitted in CNIPS for SSO?   Does the written procedures for SSO include all points of service for all approved meal types claimed? |
| **COVID-19: Waiver to Allow Offer Versus Serve Flexibilities in the SFSP**  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.  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** June 3, 2022  **Expires:** September 30, 2022 | **Requirements:**   1. Update CNIPS site application(s).   Update written procedures to include OVS. | * Do the procedures include serving all required meal components, if implementing OVS? * Is the CNIPS site application updated to indicate the site is implementing OVS? |
| COVID–19: Child Nutrition Response #107  **Nationwide Waiver to Extend Area Eligibility Waivers for Summer 2022 Operations – EXTENSION 5 (SSO/SFSP).**  Food and Nutrition Service extends the ability for states to continue operating open sites in areas that are not located in “Areas in which poor economic conditions exist.”  Program Operators must opt-in by completing the online waiver election application at:  <https://surveys3.cde.ca.gov/go/summer22cnpwaivers.asp>.  **Effective:** June 30, 2002  **Expires:** September 30, 2022 | **Requirements:**   1. Update CNIPS 2. Update MCCP (SSO) 3. Update internal control procedures to ensure accurate meal counts and claiming (SFSP) 4. Procedures indicating how you are ensuring that meal sites are targeting benefits to children in need. For example- children who may be eligible for benefits due to the economic impacts of COVID–19. | * Update site information in CNIPS * Does the agency have an accurate MCCP (SSO)?   Does the agency have internal procedures to ensure accurate meal counts and claiming (SFSP)? |
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###### For all other FNS nutrition assistance programs, state or local agencies, and their subrecipients, must post the following Nondiscrimination Statement:

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA’s TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant’s name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or
2. **fax:**  
   (833) 256-1665 or (202) 690-7442; or
3. **email:**  
   [program.intake@usda.gov](http://mailto:program.intake@usda.gov/)

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