

SUMMER FOOD SERVICE PROGRAM (SFSP) FULL MANAGEMENT PLAN AND PERFORMANCE STANDARDS: FINANCIAL VIABILITY, CAPABILITY, AND ACCOUNTABILITY (VCA) DOCUMENT GUIDE

General Eligibility Documents:

501c3 IRS Determination Letter: An exemption determination letter from the U.S. Internal Revenue Service (IRS) indicating that the organization is exempt pursuant to §501(c)(3) of the United States Tax Code. (Churches do not need to submit this letter.)

Unique Entity ID: The UEI is a 12-character alphanumeric identifier assigned to an entity by the System for Award Management (SAM). Program operators are not required to complete full entity registration. Child Nutrition Program Operators are required to have the UEI to receive payments from State agencies that administer the Child Nutrition programs on behalf of the Federal government. SFSP sponsors must have an active UEI registration in [SAM.gov](https://sam.gov).

Performance Standard 1: Financial Viability

The sponsor must have adequate sources of funds available to operate the Program, pay employees and suppliers during periods of temporary interruptions in Program payments, and pay debts if fiscal claims are assessed against the sponsor.

An organization may document financial viability one of two ways:

Option 1: *The organization may submit audited financial statements performed by a Certified Public Accountant (CPA) in an independent audit conducted within the last two fiscal years.*

Option 2: *The organization may submit twelve months of comprehensive financial statements, as described below.*

Audited financial statements performed by a Certified Public Accountant (CPA) in an independent audit conducted within the last two fiscal years.

OR

12 Months of Comprehensive Financial Statements, that include all of the below:

Balance Sheet: A balance sheet reports an organization's financial position. A balance sheet shows assets (what is owned), liabilities (what is owed), and net assets, or equity. Common mistakes on a balance sheet include:

- Net assets not correctly calculated.
- Accounts Payable or long-term liabilities not listed.
- Using "plug numbers" to get statements to balance.

- Do not include any personal loans.

Profit & Loss/Income Statement: A profit & loss statement summarizes profit generating activities. This a financial report that provides a summary of a organization’s revenues, expenses, and profits/losses over a given period of time in this case at least 12 months. Common mistakes on a profit & loss statement include:

- Including projected revenues and expenses instead of actual revenue and expenses received during the period report.
- Not including the depreciation expense. A depreciation expense is an income statement item that accounts for the loss in value of fixed assets over time.

Detailed General Ledger: A detailed general ledger is a record of all past transactions of an organization organized by account. There are five types of accounts (assets, liabilities, equity, income, expenses), and a debit or credit increases or decreases each one. This statement should contain detailed information about each transaction such as the date, description and amount associated with each transaction.

Supporting documents to verify figures on the balance sheet which can include any of the below as applicable:

- All bank statements for all accounts in the name of the organization
- Credit card statements
- Depreciation schedule
- Listings of receivables or payables
- Grant award Notices
- Single audit reports
- Designated funds from the board

Promissory Notes/ Loan Documents: These documents must be signed by both lender and borrower and include all pages.

Lease Agreements: These documents must be signed by lessor and lessee and include all pages.

Performance Standard 2: Administratively Capable

Documents for this section will be submitted online via the Claims Reimbursement and Reporting System (CRRS) once the sponsor has met Performance Standard One, financial viability, as determined by the Department.

The sponsor must be administratively capable. Appropriate and effective management practices must be in effect to ensure that Program operations meet the requirements of this part. To demonstrate administrative capability, the sponsor must have an adequate number and type of qualified staff to ensure the operation of the Program and have written policies and procedures that assign Program responsibilities and duties and ensure compliance with civil rights requirements.

Organizational Chart: The organizational chart should include all positions/titles/board members/officers for the entire organization, including:

- All management personnel
- All site personnel (if applicable)
- All full legal names associated with the positions/titles
- If applicable, list Vacant if personnel not hired yet. See Hiring Plan below.

NOTE: Your organizational chart must include an adequate number of site personnel to conduct proposed operations at each site.

Job Descriptions: Organization should provide job descriptions for each position with SFSP duties, excluding board members.

Hiring Plan: The hiring plan is required only for organizations that do not have all personnel hired) The hiring plan must include:

- Plan for hiring all personnel prior to the first day of service (for all positions listed as Vacant in the organizational chart)
- Position(s) responsible for hiring personnel
- When new personnel will receive training
- Position(s) responsible for training new personnel

Training Plan: The management plan documents that staff have the skills and training required to fulfill program responsibilities. Documents include the topics covered at each training, methods used to deliver trainings, and frequency of trainings that the sponsor will provide. The training materials used to train site staff must include training on the purpose of the Program; site eligibility; recordkeeping; site operations, including both congregate and non-congregate meal services; meal pattern requirements; civil rights requirements; food safety practices and procedures; and the duties of a monitor. A sample training plan is available in CRRS.

Community Needs/Recruitment Strategy: It is important for sponsors to evaluate the needs and resources of the communities they hope to serve. Mapping and other data tools and community partnerships can help sponsors locate areas of high-need and potential site locations at schools, parks, recreation centers, public pools, libraries, museums, and other community facilities. Sponsors looking to add sites may refer to the Site Recruitment Strategies Summer Meals Toolkit, <https://www.fns.usda.gov/sfsp/summer-meals-toolkit> for more tips on conducting successful site outreach. Sponsors may also refer to the [Capacity Builder](#), to identify locations for new sites. Outreach strategies should not discriminate based on race, color, national origin, age, disability, or sex. Provide copies of materials used for outreach and recruitment. The Department will evaluate the sponsor's recruitment strategies to prevent duplication of services in locations where other sponsors are operating the SFSP.

Sample Menu: Sponsors must submit a sample two-week menu. Menus will be reviewed for current SFSP [meal pattern](#) compliance.

Civil Rights Data Collection: Sponsors must determine the number of potentially eligible participants by race and ethnicity for the area served. This information may be obtained from census data or public school enrollment data. The sponsor also must collect race and ethnicity data each year for each site under the sponsor's jurisdiction. Sponsors of residential camps must collect and maintain this information separately for each session of the camp. For all other sites, the sponsor must count the participating children at least once during the site's operation. When collecting this data, sponsors cannot use visual identification. This means sponsors may not collect racial and ethnic data simply by looking at participants, but instead should use methods that are based on self-identification and self-reporting. Data collection templates are available in CRRS.

Site Information (Eligibility and Site Agreements): A site information sheet is required for all sites and is available in CRRS. The site information sheet includes:

- A description of the organized and supervised system for serving meals to children;
- The estimated number of meals to be served, types of meals to be served, and meal service times;
- Whether the site is rural, as defined in [§ 225.2](#), or non-rural. Documentation supporting the rural designation is required;
- Whether the meal service is congregate or non-congregate;
- Whether the site is a self-preparation site or a vended site, as defined in [§ 225.2](#);
- Arrangements for delivery and holding of meals until meal service times and storing and refrigerating any leftover meals until the next day;
- Access to a means of communication to make necessary adjustments in the number of meals delivered, based on changes in the number of children in attendance at each site;
- Arrangements for food service during periods of inclement weather;
- For open sites and restricted open sites:
- Documentation supporting the eligibility of each site as serving an area in which poor economic conditions exist;
- For closed enrolled sites:
- The projected number of children enrolled
- The projected number of children eligible for free and reduced price school meals for each of these sites; *or*
- Documentation supporting the eligibility of each site as serving an area in which poor economic conditions exist;
- For NYSP sites: Certification that all of the children who will receive Program meals are enrolled participants in the NYSP
- For camps: The number of children enrolled in each session who meet the Program's income standards.
- For sites that will serve children of migrant workers: Certification from a migrant organization, which attests that the site serves children of migrant workers; and
- Certification from the sponsor that the site primarily serves children of migrant workers, if non-migrant children are also served

- For conditional non-congregate sites: The number of children enrolled who meet the Program's income standards.
- For unaffiliated sites: Unaffiliated Site Agreement Form signed by the individual with the authority to permit the SFSP sponsoring organization meal service at the site.

Monitoring Plan: Sponsors must provide adequate personnel to meet its unique circumstances and ensure successful Program management and monitoring. To document this, a monitoring plan which includes the number of monitors, the conditions used to determine the numbers of monitors employed, the percent of time an individual staff position is devoted to monitoring, the number of sites each monitor is responsible for, and the number of reviews and visits the monitor is expected to complete each summer. The document should also include the written operational procedures for the monitor's role in ensuring that meals not meeting the meal pattern are not claimed for reimbursement and the written operational procedures for the issuing and following up on of corrective action by the monitor. A sample monitoring plan is available in CRRS.

For Private Nonprofit Organizations Only:

List of all board members and titles: Provide each board member's full legal name, address, birthdate, a description of their Program duties, and a disclosure of any relationship(s) to other board members or staff of the organization.

Performance Standard 3: Program Accountability

The sponsor must have internal controls and other management systems in place to ensure fiscal accountability and the operation of the Program. To demonstrate Program accountability, the sponsor must have a financial system with management controls specified in written operational policies. The sponsor must maintain appropriate records to document compliance with Program requirements, including budgets, approved budget amendments, accounting records, management plans, and site operations.

Policies or procedures in **Sections 1-6** must contain, **at a minimum**, the following information:

- Step-by-step instructions for each procedure
- When the procedure is carried out (e.g., the date or frequency [such as daily, weekly, or monthly])
- Position(s) responsible for performing tasks in the procedure
- How staff will be trained on the procedure(s)
- When staff will be trained on the procedure(s)
- Position(s) responsible for ensuring compliance of the procedure
- When monitoring/review of the procedures takes place (e.g., daily, weekly, bi-weekly, monthly)

Sections 1-6.

1. Policy or procedures for submitting claims accurately, and in a timely manner; this policy should focus on meal count data collection and CRRS claim entry procedures.
2. Policy describing how funds and property received are handled with fiscal integrity and accountability; this policy should focus on accounts receivable operating and review procedures.
2. Fiscal policy including how expenses are incurred with integrity and accountability; this policy should focus on accounts payable operating and review procedures.
4. Fiscal policy showing how funds and property are properly safeguarded and used, and expenses incurred, for authorized Program purposes; this policy should focus on accounting systems to record SFSP reimbursements.
5. Policy or procedures showing a system of safeguards and controls is in place to prevent and detect improper financial activities by employees; this policy should revolve around proper SFSP meal counting and meal count review procedures.
6. **Debt repayment policy:** Debt owed to the Department can occur due to organizations receiving advance payments greater than their reimbursement claims and/or review findings, resulting in fiscal action. Non-collectable debts are turned over to the State Attorney General's office for collection.

Ensure the policy contains, at a minimum, the following information:

- Step-by-step plan for repaying debt owed to the Department
- Position(s) responsible for repaying debt owed to the Department
- Funds to be used to repay debt owed to the Department
- NOTE: Funds from other USDA Child Nutrition Programs cannot be used for repayment of debt or **unallowable costs**

Section 11. Miscellaneous and Internal Controls

1. Does the organization use accounting software? Please list software used (QuickBooks, Excel, etc)
2. Does the entity conduct organization-wide audits to determine, at a minimum, the fiscal integrity of financial transactions and reports, and compliance with laws, regulations, and administrative requirements?
3. Does the organization have a systematic method to assure timely and appropriate resolution of all audit findings and recommendations?
4. Does the organization conduct a monthly review of financial statements?
5. Does the organization require secondary approval of disbursements over a certain dollar value?
6. Nonprofit Organizations Only: Board Oversight documents. A copy of the most recent board meeting minutes that includes oversight and operations of the SFSP
 - **Nonprofit Board Oversight:** Provide organization by-laws, board meeting minutes, a letter from the Board/Responsible Principals acknowledging organization's role in SFSP, or a similar document, granting Program oversight responsibility to the governing board/officers. This could include the board meeting minutes that approve the organization's SFSP budget. Also, plan to have budget approval from the board

each year for application renewal. Any submitted SFSP budget must have board approval before being submitted to the Ohio Department of Education and Workforce. Board approval is considered the supporting documentation, which authorizes your SFSP budget within the organization. Describe how the board is trained for their role to provide governance, fiscal and program accountability for SFSP; include the training content (be sure to include the reason for the Principal Identification form and the restrictions on less-than-arms-length transactions) and frequency in your description.

7. Does the organization track SFSP costs separately from nonprogram costs? Provide a Policy or procedure outlining how SFSP costs will be tracked separately from nonprogram costs.
 8. Has the organization identified the staff position responsible for assuring program funds are only used for allowable costs as prescribed by FNS guidance?
 9. Does the organization have a Written Records Retention Policy that details how Program records are secured and stored to be available for review when needed?
- **Written records retention policy:** This policy must detail how Program records are secured and stored to be available for review when needed. Ensure it contains, at a minimum, the following information:
 - Method to ensure original records are kept for three years after Program year end, or longer if required
 - Method to ensure original records are organized and available on-site for review when needed
 - Where original records will be secured and stored
 - Position(s) which have authorized access to original records
 - Procedures for maintaining any records pertaining to SFSP financials, claiming, training, eligibility, monitoring, and other program documentation. Include length of retention, location and how confidentiality is maintained.
 - Procedure for destruction and/or disposal of records.

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