

State Monitoring Plans

Utah State Board of Education Directive:

On-site Monitoring and On-site Technical Assistance During the COVID-19 Pandemic

Approval Indicators

- On-site monitoring and technical assistance *is approved if* essential and coming from and going to a low-risk county.
- On-site monitoring and technical *may be approved on a case-by-case basis if* essential and coming from and going to a moderate or high-risk county.
- On-site monitoring and technical assistance *is not approved if* not essential and coming from and going to a moderate or high-risk county.

On-site Monitoring and Technical Assistance Activities

Child Nutrition Programs

Monitoring Activities- Must “observe” meal preparation/distribution

Child nutrition directors and staff are on-site and using protections, CNP can do the same for monitoring

Technical Assistance – As deemed necessary

Data Reporting- Use the CNP data software

Complaints and Fraud-CNP has a system in place to follow-up on complaints and potential fraud communicated directly to the CNP department or through the USBE Hotline.

Internal Oversight-CNP has built in edit checks in CNPweb to identify potential errors regarding sponsor and site program information and eligibility, claim and report submissions; CNP staff conduct monthly claim checks and comparisons to identify potential claiming errors. School Programs conduct annual review of state audit risk assessment summary, indirect cost and net cash resource calculations and follow-up as needed. Additional efforts are outlined for new program sponsors to provide continued training and ensure appropriate implementation of CNP program operations.

Overview

Utah State Board of Education Child Nutrition Programs (USBE CNP) has outlined alternative monitoring procedures due to COVID-19 operations and limitations. In addition to these monitoring procedures USBE CNP will maintain current internal procedures to monitor sponsors. SFAs will continue to conduct site monitoring for programs following nationwide waivers for onsite monitoring.

Program	Procedures
Schools Program Administrative Review	<p>USBE is applying for a 6-year Review Cycle waiver.</p> <p>Administrative Review Process SY 2020-2021 specific to COVID-19 (end of 6/30/2021). Administrative Review completed by the Child Nutrition Programs Department at Utah State Board of Education (USBE) will adhere to the following process for one NSLP sponsor as originally scheduled:</p>

- NSLP Administrative Reviews (ARs) will be completed using the planned 5-year cycle rotation (under the current review cycle waiver) and USDA AR Forms, with the addition of questions pertaining exclusively to SSO.
- Sponsor was notified of and agreed to the scheduled date of their review in September.
- Specialists set up virtual meetings via Microsoft Teams, Zoom, or Google Meet with their districts to discuss the review process. Specialists will hold an opening meeting on the day of review virtually with Food Service Director, Business Administrator, and Superintendent/Charter Director.
- Specialists send the sponsor the Off-Site tool and the Dietary Specification tool to complete via the State agency's E-Review Module. All AR forms and questions are based in the E-Review module and are used.
- School selection is based on the score from the Meal Compliance Assessment Tool, historical reviews, and USDA AR site selection requirements. Site selection is done in the E-Review module.
- SFA directors will provide materials that are needed to perform the review by scanning, emailing, uploading into the module, and/or mailing information to USBE.
- For anything that requires an observation, USBE will accept pictures or videos, depending on the technology capabilities of the school district.
- The method of observation will be documented in the On-site review module.
- Eligibility will be checked by using the USDA statistical sample generator at a 99% confidence level. The state office will request new year (SY21) approved meal applications from SFA. Direct certification and categorical documentation will be requested from the SFA.
- Specialist will complete an exit conference with the Food Service Director, Business Administrator, and Superintendent/Charter Director upon completion of all tools at the end of the virtual on-site dates to communicate any Findings discovered during the review. The district/charter will receive a preliminary review with Accommodations, Technical Assistance, Findings, and Corrective Action.
- An Administrative Review will be considered closed when the following tools have been filled out, all necessary documentation has been received, all questions have been completed, and all Corrective Action is considered complete and satisfied:
 - Off-Site Assessment (E-Review Module)
 - On-Site Assessment (E-Review Module)

- Dietary Specification Assessment Tool
- Resource Management (RM) Risk Management Indicator Tool
- Comprehensive RM review questions and supporting documentation complete
- Statistical Sample Generator, if applicable
- Independent Review of Applications complete, if applicable
- Verification Report
- Meal Compliance Risk Assessment Tool
- Targeted Menu Review
- USDA Meal Certification sheets
- Week of Review menu, production records, labels, recipes, etc.
- Day of Review menu, production records, labels, recipes, etc.
- Implemented Corrective Action Plan, if applicable.
- Fiscal Action complete, if applicable.

SSO Sponsors (Operating without an Area Eligibility Waiver)

These Sponsors were scheduled for Administrative Review's in SY21 and have transitioned to Seamless Summer Operations. They will receive a SSO Review. Internal review procedures will mirror the NSLP AR procedures in completing a desk review. Training and technical assistance will continue to be provided to these SFAs. These sponsors will be scheduled for an NSLP AR review in SY22.

SSO Sponsors (Operating with an Area Eligibility Waiver)

These Sponsors were scheduled for Administrative Reviews in SY21 have transitioned to Seamless Summer Operations. Sponsors will receive customized Technical Assistance to ensure processes and procedures are in place for program integrity. These sponsors will be scheduled for an NSLP AR review in SY22.

NSLP Sponsors Transitioned to SFSP

Sponsors that transition to SFSP during SY21 that were scheduled for an Administrative Review will be reviewed under SFSP (Community Programs) and then will be rescheduled for an Administrative Review in SY22. SFSP review procedures written below.

School Program Food Service Management Review	Food Service Management Company (FSMC) reviews are scheduled for SY21 as originally planned and will be completed via desk review to meet program requirements. Utah has two FSMC reviews to complete in SY2021.
School Programs Procurement Review	FSMC procurement process, contract management and documentation will be reviewed at two SFAs in SY21. Procurement reviews are aligned with the Administrative Review for SFAs as feasible. Would complete procurement review as a desk review to finish up the cycle in SY2022 and SY2023 which will be approximately 60 reviews between the two years.
Community Programs Administrative Review (CACFP and SFSP)	<p>In the absence of Guidance on the Administrative Review Process by USDA for FY 2020-2021, Administrative Reviews completed by the Child Nutrition Programs Department at Utah State Board of Education (USBE) will adhere to the following process:</p> <ul style="list-style-type: none"> • CACFP/SFSP Administrative Reviews will be completed using the planned 3-year cycle rotation and USBE AR Forms. • Reviews are completed as desk reviews. • For announced reviews, Sponsors are notified of and agree to the scheduled dates. For unannounced reviews, Sponsors are given 48 hours' notice to submit all review documentation. • USBE Specialists set up virtual meetings via Microsoft Teams, Zoom, or Google Meet with their Sponsors to discuss the review process. Specialists will hold an opening meeting on the day of review virtually with authorized representative/owner and other pertinent staff. • Sponsor staff will provide materials that are needed to perform the review by scanning, emailing, uploading into the E-Review module, and/or mailing information to USBE. <ul style="list-style-type: none"> o For anything that requires an observation, USBE will accept pictures or videos, depending on the technology capabilities of the Sponsor. Any additional issues with technology will be addressed via technical assistance. o The method of observation will be documented in the On-site review module.

	<ul style="list-style-type: none"> • USBE Specialist will complete an exit conference with the Sponsor upon review of all submitted paperwork to communicate any findings discovered during the review. The Sponsor will receive a preliminary review with Commendations, Technical Assistance, Findings, and Corrective Action. • An Administrative Review will be considered closed and closure letter sent when all necessary fields of the review module have been filled out and all Corrective Action is considered complete and satisfied. If necessary, follow-up visits will be scheduled.
Sponsors and Sites by Program for the Month of October 2020	Noted on page four of the state document, Waiver Request_State Monitoring_SY21_Revised_20201130.