

**School Year 2020-2021
Child Nutrition Programs
Sponsor Program Integrity Plan Template**

Document Guidelines:

- Consider each section, A-E, when building your Sponsor Program Integrity Plan. A series of questions in each section have been provided to guide the development of your plan.
- Sponsors may copy and paste the provided example statements in each section that apply to your local program procedures. Be sure to edit the example statements as needed to reflect your actual program procedures.
- This template is a guide. Sponsors must determine the policies and procedures that best reflect their own organizational capabilities to meet federal program regulations.
- ODE CNP does not require sponsors to have plans approved by the department, but will review to a sponsor's integrity plan during an administrative review.

A. Equitable Access

*Equitable access to meals is key to maintaining integrity in our Child Nutrition Programs. We strive to ensure food insecure children have access to nutritious meals. The below statements include how **{Sponsor name}** will maintain equitable access to **all** participants in our meal programs:*

While formulating your integrity plan for equitable access, please consider the following questions:

Question 1: How is the program being promoted? Keep in mind that not all families have reliable access to internet or social media. Best practice is to promote in a variety of formats and places.

Question 2: How are families being informed about meal availability? Remember that sometimes information is not relevant until it is needed. Best practice is to communicate often.

Question 3: How do remote learners get meals? Keep in mind that just because they are remote does not necessarily mean families have reliable transportation or a flexible schedule. How are you varying pick up times to meet the needs of all families?

Question 4: Do families need to pre-order meals? What if someone comes to a meal distribution site and has not pre-ordered?

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Question 5: What is your plan to accommodate families that cannot make the designated distribution time or place?

Question 6: What is the plan if the school or district unexpectedly closes? How will participants receive meals? (closures include but are not limited to: COVID-19, weather, malfunction of heating system, water main break, etc.).

Question 7: Will you ensure onsite participants and curbside pick-up participants receive the same number of meals per week? If so, how? Remember, equitable access means all children have the same access to meals no matter what format they are learning in: in person, hybrid, or virtual.

Question 8: What is your plan for families who request special dietary accommodations? You are required to make reasonable accommodations for special dietary needs for children, no matter which child nutrition program you are providing meals through. Best practice is to have families pre-order meals or to have some meals pre-packaged that can be distributed in the event a family identifies a need at pickup.

Example statements may be used in your integrity plan to address the questions above:

- School meals are promoted to all participants through the school's website, school newsletters, district robo-calls, and the school district's Facebook page.
- Remote learners can pick meals up **[insert day, time and location of meal pick up]**.
- Grab and Go meals need to be pre-ordered, using the form that is posted on the school's website **[provide link]**. Additional meals will be available for those who do not preorder, on a first-come, first-serve basis.
- Families that are unable to make set pick-up times need to contact the food service director to set up alternate arrangements. This information is included in all communication to families and is on the district website **[provide link]**.
- **{Sponsor name}** will change from in-person meal distribution to curb side distribution on **[state days and times for meal pick-up]** at the locations that experience closures. To keep the Summer Food Service Program (SFSP) map up to date, site information sheets in CNPweb must be updated within two business days.

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- Meals will be offered seven days per week for curbside meal pick up. Because in-person learners are only in school five days per week, there will be an order form that includes meal pick up for weekend meals to offer seven days' worth of meals for all children.

B. Counting and Claiming

*The intent of the Child Nutrition Program is to provide nutritious meals to children and promote lifelong healthy eating habits. This may include one meal, per meal type, per participant, per day. The below statements include how **{Sponsor name}** will ensure each participant receives only the allowed number of meals per day per approved program.*

Program	Maximum Meals Allowed
Summer Food Service Program (SFSP)	2 meals or 1 meal+1 snack per day (lunch and supper not allowed on same day)
National School Lunch Program (NLSP) and School Breakfast Program (SBP)	1 breakfast + 1 lunch per school day; 1 afterschool snack if eligible
Child and Adult Care Food Program (CACFP)- At Risk After School	1 supper + 1 snack per day
Early Childhood Programs	1 breakfast + 1 lunch + 1 snack per day

While writing your integrity plan for counting and claiming, consider the following questions:

Question 1: How will participants be counted at the point of service (POS) to ensure the meal claim is accurate? Even though it is not required for SFSP, using an electronic POS or roster system may help organize and record meal distribution correctly.

Question 2: How will your district ensure each participant receives no more than the maximum number of meals from each program, each day (see chart above)? What controls will you have in place to prevent duplicative meals?

Question 3: How will you track when meals are distributed in multiple locations?

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Example statements may be used in your integrity plan to address the questions above:

- Participants attending school in-person are eating their preordered meals in the gyms. Meals are prepackaged and distributed to the participants by food service staff and the participants go immediately to the bleachers to eat their meal and cannot enter the meal distribution line again. A la carte items are not being sold, except for milk, until we can return to the cafeteria. High school participants have one designated lunch hour and middle school participants have a designated hour. The daily meal count forms will be used at each POS, and one meal will be marked per participant as the participant takes the meal from the food service staff.
- If a participant would like a second or third meal in the same meal period, or to make a main entrée only purchase, the point of sale cash register will be used to track those a la carte purchases after being documented on the roster.
- Meals for participants enrolled in in-person learning with days of distance learning, commonly referred to as hybrid learning, will have meals available to take home the day before distance learning is scheduled to take place. These meals will be distributed in classrooms at day's end at the elementary level and will distributed by food service staff and marked on a Meal Count Form at the point of distribution for the middle and high school buildings.
- Meals for distance learners will be offered once per week. Five days' worth of breakfast and lunch will be provided **[insert day, time and location of meal pick up]**. Families are highly encouraged to pre-register for meals by using **[website link]** or call **[XXX-XXX-XXXX]** by 9:00 am Tuesday to pre-register for meals. The meal pre-register form collects parent contact information and each participant's name and grade. If pre-registration is taken over the phone, food service staff will collect the information and verify the participant is not enrolled in in-person learning. During meal distribution, we ensure in-person participants are not receiving the 5-day pack of meals. Meals are being supplied to the Head Start/Preschool Promise programs and are included on the list of in-person participants that receive meals at school to ensure participants aren't receiving more than the maximum number of meals allowed per program per day.

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- If a family comes to meal distribution and has not signed up previously, food service staff will use the district provided distance learner roster to record those meals.
- In the event a family comes to meal distribution and does not have participants in the district, they will be asked to list their children's names and sign off that they will only request meals for the amount of children in their home and are only picking up meals at one distribution site per time period (example-weekly distribution).

I am picking up ___ meals for _____ family and I will/am not picking up meals for children already receiving meals for the week of _____ at another distribution site. Signature _____

- For Grab and Go locations serving breakfast and lunch together, the meal count form will indicate that one tally mark = one breakfast and one lunch served.
- We will pass out flyers with the following information: Thank you for making us your only stop for meals! We love serving our community and we want to ensure all families wishing to receive meals can do so. Meals are available for children and youth 1-18 in your household. We highly encourage you to visit only one distribution site. This helps us ensure there are enough meals for all children. Thank you for your cooperation. This institution is an equal opportunity provider.
- Posters will be hung at distribution sites stating: Welcome! The meals are provided for children and youth (1-18 years old) through the United States Department of Agriculture (USDA) Extended Summer Food Service Program. Participants do not need to be present to receive meals. For accountability, please share the school name where each eligible participant attends, if they are of school age. Duplicate meals are not allowed. This institution is an equal opportunity provider.
- If we have determined a participant has picked up or been served more than one meal per day, we will not claim the additional meals for reimbursement under any USDA Child Nutrition Program.

C. Community Distribution

The Federal guidelines for Extended SFSP and the At Risk After School Program allows sponsors to offer free meals for all participants within the community ages 1-18, and up to 26 years of age with a disability and

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*participating in a sponsor educational program. The statements below include how **{Sponsor name}** will ensure participants and families will be informed of locations where free meals can be received.*

While formulating your integrity plan for community distribution, please consider the following questions:

Question 1: If you have a closed-site and have hungry participants in your community, how will you help them receive meals?

Question 2: What organization(s) will you partner with in your community to promote or provide free meals?

Question 3: Have meal sites and times been widely communicated to area families?

Example Statements:

- Meal sites and times are posted to the district website and updates are made to the district Facebook page to relate changes to families quickly.
- The school district will connect with the local food bank or another community sponsoring agency about being an open site for the community.
- **{Sponsor name}** has reached out to local YMCA, religious organizations, and the local community food bank to ensure all participants within our district have equitable access to meals.
- Mobile meal distribution sites are in strategic areas around the district to ensure access to all participants **[include list of sites]**.
- If participants are in need of meals and there isn't an accessible meal distribution site for the family, our school will set up a specified time and location to provide meals to the family. This will be documented on the check off sheet and claimed in the SFSP monthly claim. This may include delivery to their home.

D. Training

Training is important to the integrity of all Child Nutrition Programs. SFSP and CACFP have specific guidelines regarding sponsor and staff training (including new sponsor training, on-going staff training, and Civil Rights training). All staff need to be trained on the program when changes occur. The below

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*statements include how **{Sponsor name}** will adhere to the required program training guidelines and ensure staff are appropriately trained.*

While formulating your integrity plan for training, please consider the following questions:

Question 1: Which employees need to be trained? Is there staff outside of the food service department that needs to be trained?

Question 2: Are there volunteers at meal distribution sites that need to be trained?

Question 3: How will training be documented?

Example statements:

- Food service staff were trained on current program requirements for SFSP and CACFP **[date]**. Documentation of training is kept on file.
- Food service staff will be trained, and documentation kept on file, as needed when future program changes occur.
- Teaching staff and paraprofessionals who help with serving meals in the classroom are trained on point of sale information and this information is documented and kept on file.

E. Meal Quality and Meal Components

*In addition to addressing food security, the Child Nutrition Programs play a critical role in educating participants about healthy food and help to develop a life-long healthy relationship with food. It is critical to provide meals to participants which embody this expectation. To uphold nutrition integrity in Child Nutrition Programs, meal patterns must be followed to receive reimbursement for each meal served. If meal pattern requirements cannot be met due to supply shortage, safety issues, etc. a [Meal Pattern Flexibility Waiver Request](#) form must be completed for review by ODE CNP. The below statements include how **{Sponsor name}** will ensure nutritional quality and proper meal patterns are being followed.*

While formulating your integrity plan for meal quality and meal components, please consider the following questions:

Question 1: How will you ensure each participant receives a full reimbursable meal, including milk, during curbside pick-up?

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Question 2: How will you ensure the proper components are received for a reimbursable meal in on-site meal service? (describe process)

Question 3: Will you participate in a modified Offer versus Serve style meal service? If so, have contacted your Child Nutrition Specialist and adjusted site information sheets to indicate this? How will you ensure that the requirements of modified OVS are met?

Question 4: How will you adjust if a meal component is not available during service time due to a supply chain issue, safety issues, etc.?

Question 5: What measures are you taking to uphold meal quality within your program to both in-person and remote learners?

Question 6: How will you ensure food safety of meals sent home? How will you communicate to families the temperature control or cooking instructions for meals picked up?

Example statements:

- Food service director will complete a monthly menu which will meet meal pattern requirements and will be followed by staff for both in-person and remote learners. Menu will be posted on website and adhered to.
- If a food component is unavailable, a meal pattern flexibility waiver request will be submitted to ODE CNP for approval.
- A survey will be completed with participants and parents to ensure appropriate menu variety and food is being consumed by participants.
- Food storage and heating instructions will be included with all meals that are sent home and will be posted on the district's webpage.
- Production records will be kept to document meals produced and served, serving sizes, and meal component crediting information.
- Separate production records for multi-day meal packs will be kept showing all meals, amounts provided, and meal component crediting information. Separate production records will be used for breakfast and lunch.

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This institution is an equal opportunity provider.