



State Program Integrity Plan for Implementing COVID-19 Waivers

Alaska Child Nutrition Programs

Alaska has opted into most nationwide waivers offered from March 2020 to present.

<https://www.fns.usda.gov/disaster/pandemic/covid-19/alaska#cn>

Overview

By opting into available nationwide waivers, School Food Authorities (SFAs) and community organizations in Alaska were given the flexibility needed to continue to leverage innovative and collaborative meal solutions in support of social distancing, thereby protecting students, staff, families and communities and preventing the spread of COVID-19. There are no pending USDA waiver requests for the state agency to opt in to participate.

Implementation of the waivers enabled Alaska CNP and all participating SFAs and community organizations to provide meals to all students who wish to receive them during the period of unanticipated school closures/remote learning (whether full or partial closure) until COVID-19 is safely under control and school schedules have returned to normal, thus effectively extending the State's public health nutrition response.

These waivers helped schools, families and communities minimize potential exposure to the COVID-19 thereby promoting the national and state objectives of ensuring the health, safety and well-being of our children and citizens as well as slowing the spread of the virus. These waivers enabled SFAs and community organizations to provide nutritious meals safely, effectively and efficiently to the state's most vulnerable food insecure students, while supporting the overall program sustainability, financial viability and optimal program integrity.

Alaska CNP is committed to ensure SFAs and community organizations continue to operate the National School Lunch Program's (NSLP) Seamless Summer Option (SSO) and Summer Food Service Program (SFSP) with fidelity, accountability and integrity in a manner that best responds to the varying school nutrition delivery models. Through this approach, SFAs and community organizations were able to serve nutritious meals to more children when the need is greatest. Implementation of the SSO and SFSP enabled SFAs to partner with other "sites" that may provide meals to students, thus limiting the numbers of unnecessary visitors to the school campuses, thus supporting optimal social distancing and preventing the spread of COVID-19. Exercising maximum flexibilities enabled the school nutrition programs to continue to serve as the "safety net" for food-insecure children/students who depend upon meals at school for their primary source of food and nutrition.

FY21 Statistics:

NSLP/SBP: FY21: A total of 59 SFAs comprised of 44 school districts and 15 RCCIs participate in the National School Lunch Program/School Breakfast Program at 431 sites; 42 of the school districts have since transitioned to the SFSP.

CACFP: FY21 64 Sponsors of 235 institutions and/or facilities and 196 Family Day Care Home Providers.

SFSP: FY21 (school year) 42 SFAs have transitioned from NSLP/SBP to SFSP. During traditional summer months we have approximately 30 sponsors comprised approximately 50% SFAs, 25% CACFP childcare/at-risk sponsors and 25% summer only programs; most of the SFAs in Alaska do not normally participate in SFSP.

Alaska CNP State Program Integrity Plan Principles:

1. **Training/Ongoing Support** – Ensure SFAs and community organizations understand intentions of the waivers and how to properly implement them. Ensure SFAs and community organizations have access to written guidance (USDA Q&As, memorandums etc.) sent via bulletins and broadcasts.
2. **Program Approval** – Ensuring that each SFA or community organization is approved per USDA guidance to avoid duplicative meal program services or unallowable meals.
3. **Program Monitoring** – Ensuring each SFA or community organization serving meals through SSO or SFSP fully understand guidance especially access to meals and general program integrity.

1. Program Integrity- Training/Ongoing Support

AK CNP has extensively trained SFAs and community organizations to provide millions of compliant meals to kids and teens in food insecure households. The extensive training has allowed these meals to be distributed in compliance with the numerous waiver flexibilities and state mandated COVID-19 safety precautions. SFAs and community organizations have been trained to ensure meal distribution focuses on their free and reduced-price student population and promoting the meals as available for students in households experiencing food insecurity.

Training and technical assistance models include:

- AK CNP distribution of:
 - USDA memorandums for each waiver;
 - AK CNP program specific waiver requests;
- Weekly NSLP/SSO/SFSP roundtable discussions;
- Monthly CACFP meetings
 - Sponsoring Organization of FDCH meetings;
 - Roundtable waiver discussions open to all CACFP sponsors and institutions;
- eLearning on demand covering a wide array of Child Nutrition Programs elements;
- Additional technical assistance will be provided to program sponsors identified through risk assessment or upon request.

2. Program Integrity - Program Approvals

In approving schools and community organizations for applicable waivers, Alaska CNP will follow the following prioritization for transition to the SFSP and/or CACFP At-Risk Meals:

- 1.) School Districts
- 2.) Public and private non-profit agencies currently approved to participate in Child Nutrition Programs

Risk assessments will be utilized to approve new sponsors and/or existing sponsors for program site expansion and waiver requests; new sponsors without program experience will be deemed high risk.

Alaska CNP will apply the proximity rules applicable for SFSP to non-SFA CACFP At-Risk in the implementation of COVID-19 waivers for area eligibility for programs also requesting non-congregate feeding waivers. CACFP sponsors requesting area eligibility must provide documentation to ensure that services are (1) not duplicated; and (2) addressing gaps in meal program services.

Program sponsors opting for non-congregate feeding waivers will provide their plan to ensure compliance in meal distribution. Sponsors will not be approved to provide students meals over the USDA limits per program:

NSLP: 2 meals and afterschool snack; or afterschool snack only
CACFP: 2 meals and snack or At-Risk: 1 meal and snack
SFSP: 2 meals or 1 meal and 1 snack

Sponsors approved to participate in multiple programs may not serve children more meals than allowed per program. School sponsors may not be approved for both the Afterschool snack in NSLP and CACFP At-Risk Afterschool Meals snack.

3. Program Integrity - Monitoring

NSLP Monitoring:

FY20 – All on-site monitoring was conducted prior to COVID-19 related school closures and travel freeze.

FY21 – Residential Child Care Institutions and school districts opting to stay in NSLP/SBP that are scheduled for review in FY21 will receive full NSLP/SBP Administrative Review (AR) including procurement and FFVP via distance delivery due to the State of Alaska travel freeze;

NSLP/SBP Waivers:

- Alaska CNP is on year 2 of a 5-year AR cycle per approved waiver;
- Alaska will continue to utilize the national off-site monitoring waiver;

SFSP Monitoring:

SFAs transitioned to SFSP operating March to May 2020:

Alaska CNP program staff conducted scheduled calls with school district SFSP program operators to conduct basic first year Summer Food Service Program monitoring; AK CNP waived fiscal review and other on-site required elements. Alaska CNP required corrective action as necessary to ensure program integrity.

Traditional SFSP programs operating May to August 2020:

Alaska CNP program staff and contracted program monitors conducted scheduled calls with traditional SFSP sponsors to conduct full SFSP program monitoring. Program reviews included

the following sponsors:

- 1.) Sponsors subject to review every 3 years;
- 2.) Follow-up reviews; and
- 3.) Additional reviews to meet the 50% of FY19 claim requirement.

We had no new applicants requiring pre-approval or 1st year reviews

All aspects of operation were reviewed according to regulations and guidance. Alaska CNP required corrective action as necessary to ensure program integrity.

SFSP programs operating August 2020 to August 2021:

Alaska CNP program staff and contracted program monitors will conduct monitoring on the following programs:

- 1.) SFSP Sponsors who are due for an AR based on the 3-year cycle;
- 2.) SFSP Sponsors subject to pre-approval reviews (unless waived per 7 CFR 225.7(d)(1)(i));
- 3.) SFSP Sponsors subject to first-year reviews;
- 4.) SFSP Sponsors subject to follow-up reviews due to compliance issues in previous SFSP review; and
- 5.) SFSP Sponsors (SFAs only) previously identified through NSLP/SBA risk assessment for follow-up review

SFSP AR Scope Change (SFAs operating SSO/SFSP in lieu of NSLP/SBP only)

To support overall program integrity, SFAs operating under SSO and/or SFSP who are up for review (see list above) will also be subject to the following, as applicable:

- 1.) SFAs who received and processed Free and Reduced-Price applications for the NSLP/SBP programs will be reviewed to determine accuracy, even if eligibility status is not used for the current program year (reinforcing verification requirements per policy memo SP 04-2021, CACFP 03-2021, SFSP 03-2021 item #7);
- 2.) SFAs participating in the Fresh Fruit and Vegetable Program with SFSP will be reviewed;
- 3.) SFAs participating in the Afterschool Snack Program under 7 CFR 210 while participating in SFSP will be reviewed; and
- 4.) SFAs will receive procurement and resource management reviews.

SFSP Waivers:

- Alaska will continue to utilize national off-site monitoring waiver
- Additional waiver requested for the following:
 - o 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.*

CACFP Monitoring:

FY20 – All required CACFP program reviews on-site activity was completed prior to COVID-19 related travel freeze.

FY21 – All required CACFP program reviews will be completed via distance delivery due to the State of Alaska travel freeze. Monitoring will be conducted by program staff and/or contracted reviewers. Sponsors to be reviewed will be those required every three years, those requiring follow-up, pre-approval and first year reviews, and additional reviews as required to meet the 33.3% review requirement.

CACFP Waivers:

- Alaska will continue to utilize the national off-site monitoring waiver

- Additional waiver requested for the following:
 - ⊖ 7 CFR 226.6(m)(6); *Frequency and number of required institution reviews.* The State agency must annually review at least 33.3 percent of all institutions. *At least 15 percent of the total number of facility reviews required must be unannounced.*

FY22 AR Plan

All Program Sponsors receiving an off-site monitoring review in FY21 may be subject to a full or targeted AR in FY22 based on the following risk factors:

- Overall compliance issues and risk of repeat findings; this will cross programs(i.e. if an SFA is having issues in SFSP in FY21, this could prompt a review in NSLP/SBP in FY21);
- Delay in response to AR request for initial documents and/or corrective action documentation; and
- Significant program growth