Three Strikes
Policy and Procedure

PURPOSE

The purpose of this policy is to ensure compliance of all Summer Food Service Program (SFSP) sites sponsored by Greater Pittsburgh Community Food Bank. SFSP sponsors are responsible for ensuring compliance with all USDA and PA Department of Education SFSP regulations for all sponsored sites. The Food Bank’s corrective action process is intended to ensure that we are fulfilling our responsibilities as a sponsor to provide clear communication about compliance concerns and the steps we feel will help to address them. This is important for maintaining the integrity of the program and for maintaining our status as a sponsor.

POLICY

Sites that receive three “strike” visits may no longer be eligible for SFSP sponsorship through Greater Pittsburgh Community Food Bank. Sites will have one week from the visit to implement the corrective actions and become compliant with program requirements. The site will be monitored again after this implementation week to assess adherence to the CAR. If the site is still non-compliant with program requirements, the site may be issued a second “strike” and another chance to improve. Failure to improve after the second “strike” may result in the third and final “strike”, and Greater Pittsburgh Community Food Bank may choose to terminate its contract with the site. A site may also accumulate strikes for unrelated non-compliance issues.

Non-compliance issues resulting in an automatic “strike”:
- Serving outside of approved meal times
- Failing to take Point-of-Service meal counts
- Failing to stop children from taking unallowable food items off-premises
- Fabricating meal count numbers
- Failing a PA Dept. of Ed. monitoring visit such that meals are disallowed
- Failing to serve each required component of the meal
- Allowing conditions that create egregious health and safety issues
- Having untrained (by sponsor in 2020) individuals performing SFSP duties
- Performing SFSP duties without the required clearances
- Failing to report site closure to the Food Bank, including field trips

Non-compliance issues resulting in a “strike” if observed more than once:
- Failing to use Link2Feed meal-counting program unless specifically allowed by sponsor
- Failing to temp foods upon delivery & again within 15 minutes of service
- Failing to follow GPCFB’s delivery acceptance procedures
- Failing to check CACFP emails daily, and/or not replying, if requested, within 2 business days or as otherwise specified
- Allowing conditions that create minor health and safety issues
- Failing to maintain back-up meal count sheets
- Failing to post “And Justice For All” poster

In addition to the information described here as a guideline for the three strikes policy, Greater Pittsburgh Community Food Bank reserves the right to terminate a Summer Food program at its discretion in accordance with Summer Food Service Programs rules (7 CFR Part 225).

PROCEDURE

Following formal monitoring visits or check-in visits, monitors will explain the outcome of all monitoring visits to the site and a trained site staff person will sign off on the monitoring form, indicating that she or he has read and understands the issue(s), if any, cited by the monitor. The monitor will inform the site of one of three outcomes:

1. Pass: Site does not need to take any corrective action and return visit is not required;
2. Minor concerns: Site needs to take minor corrective action and return visit is not required; or
3. Serious concerns: Site needs to take corrective action and return visit is required in 7-20 days.

If serious concerns are identified, the site will receive a Corrective Action Report (CAR) via email with seven days of the visit, which will identify in detail the issue(s) observed on the visit, the specific steps the site must take to resolve the issue(s), and inform the site of whether it is receiving a strike. The CAR may require action such as on-site coaching, re-training, changing delivery acceptance procedures, changing meal service/count procedures, increasing communication with Food Bank staff, adjusting meal times, or others.

Please note: Sites are encouraged to request assistance when struggling to comply with program regulations or requirements. Sites will not be penalized for requesting support.

VERIFICATION

By signing this form, the Partner Site acknowledges that it understands and agrees to the Three Strikes Policy of Greater Pittsburgh Community Food Bank.

Program Site Name

Program Site Representative Name (Print)

Program Site Representative Signature         Date