



Division of Child Care & Early Childhood Education
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MEMORANDUM

TO: ALL DCCECE HNU USDA CACFP PROGRAMS
FROM: DCCECE
DATE: APRIL 26, 2023
SUBJECT: **WAIVER EXPIRATION (June 30, 2023) PLUS MONITORING IN THE FUTURE**



This memo provides the most up-to-date information we have at this time related to COVID waivers approved that are expected to expire in a few short weeks.

CACFP Nationwide Waivers listed below are set to expire June 30, 2023:

- Non-Congregate Meal Service
- Parent/Guardian Pick-Up
- Meal Service Times Waiver

NSLP/SBP Nationwide Waivers listed below are set to expire June 30, 2023:

- Non-Congregate Meal Service
- Parent/Guardian Meal Pickup
- Offer Vs. Serve
- Food Service Management Contract Duration
- FNS-874 Second (Independent) Review of Applications
- FNS-640 Administrative Review Data Report

SFSP

- There will be no waivers provided for Summer 2023.

We are pleased waivers were available to serve Arkansas children and adults during these difficult COVID years. However, the public health emergency (PHE) is set to expire on May 11, 2023. Therefore, please note that any meals served using these waiver approvals will be disallowed and potential overclaims established after June 30, 2023.



Food and Nutrition Service

DATE: April 6, 2023

MEMO CODE: SFSP 06-2023

Braddock Metro Center

SUBJECT: Oversight and Monitoring of the Summer Food Service Program - Guidance on On-site and Off-site Strategies and Options

1320 Braddock Place Alexandria VA 22314

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Issuing Agency/Office:	FNS/Child Nutrition Programs
Title of Document:	Oversight and Monitoring of the Summer Food Service Program - Guidance on On-site and Off-site Strategies and Options
Document ID:	
Z-RIN:	
Date of Issuance:	April 6, 2023
Replaces:	
Summary:	1) The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Summer Food Service Program. 2) This memorandum impacts review requirements regarding the Summer Food Service Program and provides guidance to State agencies and local operators implementing the Program.

The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Summer Food Service Program (SFSP).

One of the primary responsibilities of the Food and Nutrition Services (FNS) is the oversight and management of the 16 Federal nutrition assistance programs. Program monitoring is essential for ensuring that the Federally funded Child Nutrition Programs meet the requirements set forth in regulations, are operated with integrity, and provide nutritious meals and snacks to those who participate in the programs.

With the announcement of the start of the COVID-19 Public Health Emergency (PHE) on March 13, 2020, on-site monitoring of the Child Nutrition Programs became challenging and difficult to conduct as the number of COVID-19 cases increased and social distancing measures were enacted. FNS issued nationwide waivers for on-site monitoring requirements, allowing State agencies to monitor Program operations off-site. Off-site monitoring helped ensure Program integrity while protecting the health and safety of staff and participants.

FNS understands that State agencies quickly adapted review and monitoring procedures to include off-site strategies in response to the COVID-19 PHE and are interested in continuing to adapt some review procedures. The intent of this memorandum is to provide guidance to State agencies regarding on-site monitoring and when it is required by regulations, when States have discretion to conduct monitoring off-site, and when FNS recommends utilizing any applicable discretion to conduct monitoring off-site. In addition, with State agency approval, local operators may utilize the guidance in this memorandum. While some review procedures are required in regulation to be conducted on-site, many are not. During the PHE, State agencies were able to find effective and efficient ways to monitor areas of the review off-site that are traditionally conducted on-site. However, some areas of the review that have flexibility to be conducted off-site are best reviewed on-site or may be challenging to conduct off-site. FNS recognizes that there is not a universal approach to monitoring. Although this memorandum outlines areas of discretion in general, State agencies also have some discretion when considering the oversight needs of individual Program operators when determining what review elements could be examined on-site versus off-site. Some operators may benefit from most review activities conducted on-site, and for others, on-site time may be better utilized on technical assistance. Please note that these on-site and off-site strategies apply to both congregate and non-congregate meal service options.

Accompanying this memorandum is an appendix that outlines the review requirements and the on-site and off-site strategies and options applicable to the SFSP.

State agencies are reminded to distribute this memorandum to Program operators immediately. Program operators should direct any questions concerning this guidance to their respective State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Sincerely,

JESSICA SARACINO Digitally signed by JESSICA
SARACINO
Date: 2023.04.06 17:19:55 -04'00'

Jessica Saracino
Director
Program Monitoring and Operational Support Division
Child Nutrition Programs



Food and Nutrition Service

DATE: April 6, 2023
MEMO CODE: CACFP 07-2023

Braddock Metro Center

SUBJECT: Oversight and Monitoring of the Child and Adult Care Food Program - Guidance on On-site and Off-site Strategies and Options

1320 Braddock Place Alexandria VA 22314

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Issuing Agency/Office:	FNS/Child Nutrition Programs
Title of Document:	Oversight and Monitoring of the Child and Adult Care Food Program - Guidance on On-site and Off-site Strategies and Options
Document ID:	
Z-RIN:	
Date of Issuance:	April 6, 2023
Replaces:	
Summary:	1) The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Child and Adult Care Food Program. 2) This memorandum impacts review requirements regarding the Child and Adult Care Food Program and provides guidance to State agencies and local operators implementing the Program.

The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Child and Adult Care Food Program (CACFP).

One of the primary responsibilities of the Food and Nutrition Services (FNS) is the oversight and management of the 16 Federal nutrition assistance programs. Program monitoring is essential for ensuring that the Federally funded Child Nutrition Programs meet the requirements set forth in regulations, are operated with integrity, and provide nutritious meals and snacks to those who participate in the programs.

With the announcement of the start of the COVID-19 Public Health Emergency (PHE) on March 13, 2020, on-site monitoring of the Child Nutrition Programs became challenging and difficult to conduct as the number of COVID-19 cases increased and social distancing measures were enacted. FNS issued nationwide waivers for on-site monitoring requirements, allowing State agencies and sponsors to monitor Program operations off-site. Off-site monitoring helped ensure Program integrity while protecting the health and safety of staff and participants.

As outlined in SP 03-2023, CACFP 02-2023, [Offsite Monitoring of the CACFP and School Meal Programs After the Public Health Emergency Ends](#), the Department of Health and Human


Services recently announced that May 11, 2023, is the planned end date for the COVID-19 PHE. Given this expiration date, the FNS-issued nationwide on-site monitoring waivers are set to expire on June 10, 2023, 30 days after the end of the PHE. In addition to these nationwide waivers, FNS issued individual off-site monitoring waivers for States that requested them. While not impacted by the end of the PHE, these waivers are scheduled to expire on June 30, 2023.

FNS understands that State agencies quickly adapted review and monitoring procedures to include off-site strategies in response to the COVID-19 PHE and are interested in continuing to adapt some review procedures. The intent of this memorandum is to provide guidance to State agencies regarding on-site monitoring and when it is required by regulations, when States have discretion to conduct monitoring off-site, and what monitoring procedures are recommended when States have discretion to conduct monitoring on or offsite. In addition, with State agency approval, local operators may utilize the guidance in this memorandum. FNS recognizes that there is not a universal approach to monitoring. Although this memorandum outlines areas of discretion in general, State agencies also have some discretion when considering the oversight needs of individual Program operators when determining what review elements could be examined on-site versus off-site. Some operators may benefit from most review activities conducted on-site, and for others, on-site time may be better utilized on technical assistance.

Accompanying this memorandum is an appendix that outlines the review requirements and the on-site and off-site strategies and options applicable to the CACFP.

State agencies are reminded to distribute this memorandum to Program operators immediately. Program operators should direct any questions concerning this guidance to their respective State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Sincerely,

JESSICA SARACINO  Digitally signed by JESSICA SARACINO
Date: 2023.04.06 17:21:14 -04'00'

Jessica Saracino
Director
Program Monitoring and Operational Support Division
Child Nutrition Programs



Food and Nutrition Service
Braddock Metro Center
1320 Braddock Place
Alexandria VA 22314

DATE: April 6, 2023
MEMO CODE: SP 12-2023
SUBJECT: Oversight and Monitoring of the School Meals Programs- Information Regarding Onsite and Offsite Strategies and Options
TO: Regional Directors
Special Nutrition Programs
All Regions
State Directors
Child Nutrition Programs
All States

Issuing Agency/Office:	FNS/Child Nutrition Programs
Title of Document:	Oversight and Monitoring of the School Meal Programs- Information Regarding Onsite and Offsite Strategies and Options
Document ID:	
Z-RIN:	
Date of Issuance:	April 6, 2023
Replaces:	
Summary:	1) The purpose of this memorandum is to provide guidance regarding onsite and offsite strategies and options for oversight and monitoring of the School Meal Programs. 2) This memorandum impacts review requirements regarding the Fresh Fruit and Vegetable Program, School Breakfast Program, National School Lunch Program, including the Seamless Summer Option, and Special Milk Program. 3) This memorandum provides guidance to State agencies implementing the above programs.

The purpose of this memorandum is to provide guidance regarding onsite and offsite strategies and options for oversight and monitoring of the School Meal Programs.

One of the primary responsibilities of the Food and Nutrition Services (FNS) is the oversight and management of the 16 Federal nutrition assistance programs. Program monitoring is essential for ensuring that the Federally funded Child Nutrition Programs meet the requirements set forth in regulations, are operated with integrity, and provide nutritious meals and snacks to those who participate in the programs.

With the announcement of the start of the COVID-19 Public Health Emergency (PHE) on March 13, 2020, onsite monitoring of the Child Nutrition Programs became challenging and difficult to conduct as the number of COVID-19 cases increased and social distancing measures were enacted. FNS issued nationwide waivers for onsite monitoring requirements, allowing State agencies to monitor Program operations offsite. Offsite monitoring helped ensure Program integrity while protecting the health and safety of staff and participants.

As outlined in SP 03-2023, [Offsite Monitoring of the Child and Adult Care Food Program and School Meal Program After the Public Health Emergency Ends](#), The Department of Health and Human Services recently announced that May 11, 20223 is the planned end date for the PHE. Given this expiration date, the FNS-issued nationwide onsite monitoring waivers are set to expire on June 10, 2023, 30 days after the end of the PHE. In addition to these nationwide waivers, FNS issued individual offsite monitoring waivers for States that requested them. While not impacted by the end of the PHE, these waivers are scheduled to expire on June 30, 2023.

FNS understands that State agencies quickly adapted review and monitoring procedures to include offsite strategies in response to the COVID-19 PHE and are interested in continuing to adapt some review procedures. The intent of this memorandum is to provide guidance to State agencies regarding onsite monitoring when it is required by regulations and what monitoring procedures are recommended when States have discretion to conduct monitoring on or offsite. FNS recognizes that there is not a universal approach to monitoring. Although this memorandum outlines areas of discretion in general, State agencies also have some discretion when considering the oversight needs of individual Program operators when determining what could be reviewed onsite versus offsite. Some operators may benefit from most review activities conducted onsite, and for others, onsite time may be better utilized on technical assistance. Please note that these on-site and off-site strategies apply to both congregate and non-congregate meal service options.

Accompanying this memorandum is an appendix that outlines the various review provisions and the onsite and offsite strategies and options applicable to the School Meal Programs.

State agencies are reminded to distribute this memorandum to Program operators immediately. Program operators should direct any questions concerning this guidance to their respective State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Sincerely,

JESSICA SARACINO Digitally signed by JESSICA SARACINO
Date: 2023.04.06 17:20:41 -04'00'

Jessica Saracino
Director
Program Monitoring and Operational Support Division
Child Nutrition Programs

Appendix
Onsite/Offsite Monitoring Guidance
School Meal Programs

The intent of this document is to provide guidance to State agencies (SAs) on what elements of the School Meal Programs Administrative Review (AR) are required to be conducted onsite and information regarding State discretion for the review of the Programs offsite. Guidance is organized by module in the Administrative Review Manual. This resource also includes guidance on completing the entrance conference (which is optional) and exit conference (which is mandatory).

Traditionally, all questions and monitoring activities included in the offsite assessment tool were done offsite while all questions and monitoring activities included in the onsite assessment tool were done onsite. However, in many of these modules, States have the discretion to decide how monitoring will work best for their State and school food authorities, in line with regulations and recommendations from the Food and Nutrition Service. Please note that these on-site and off-site strategies apply to both congregate and non-congregate meal service options.

The chart below has three columns: Administrative review module and associated regulations, required and recommended onsite procedures, and offsite procedures.

Please note the following items.

Onsite monitoring is required in the following areas:

- Observance of meals; and
- Observance of counting and claiming procedures.

Onsite monitoring is highly recommended in the following areas:

- Sections of the AR that require the SA to validate school food authority-provided documentation.

Offsite monitoring options can be considered when:

- The SA can adequately obtain needed documentation in order to fully complete the review.
- Exchange of information containing personally identifiable information (PII) is conducted in a secure manner.
 - If information containing PII cannot be sent securely, then that portion **must** be conducted onsite.
- The SA can conduct interviews via phone call, email or video conference.
 - Ensure that all appropriate staff are notified and communication expectations are clear.

Refer to the following chart for details about how each Administrative Review Module must be conducted onsite and what can be completed offsite according to regulations.

Administrative Review Requirements

Module and Regulations	Procedures to be Conducted Onsite	Procedures with Option to be Conducted Off-site
100- Certification and Benefit Issuance 210.18(g)(1)(i)	Recommendation: Follow up on unanswered questions, concerns, and/or potential errors onsite.	This module may be completed offsite when the SA can adequately obtain needed documentation.
200- Verification 210.18(h)(2)(i)(B)	Recommendation: Follow up on unanswered questions, concerns, and/or potential errors onsite.	This module may be completed offsite when the SA can adequately obtain needed documentation.
300- Meal Counting and Claiming 210.18(g)(1)(ii)	Requirement: Monitor meal counting and claiming procedures onsite.	Claim validation for the month of review and staff interview process questions: May be completed offsite when the SA can adequately obtain needed documentation.
400- Meal Components and Quantities 210.18(g)(2)(i)	Requirement: Validate meal items/components and quantities, complete meals, and meal signage on day of review onsite.	Week of menu review: May be conducted offsite when the SA can adequately obtain needed documentation (such as production records, standardized recipes, nutrition facts labels, CN labels, product formulation statements, USDA Foods information sheets, and menus).
500- Offer vs Serve 210.18(g)(2)(i)(B)(3)	Requirement: Validate offer versus serve is conducted correctly at the point of service onsite on day of review.	
600- Dietary Specifications and Nutrient Analysis 210.18(g)(2)(ii)	Recommendation: Validate dietary specifications onsite through observations and review of menu documentation.	Dietary specifications: May be conducted offsite when the SA can adequately obtain needed documentation, with onsite validation taking place. Nutrient analysis (if required): May be conducted offsite when the SA can adequately obtain needed documentation.
700- Resource Management 210.18(h)(1)	Recommendation: Conduct onsite review activities depending on the needs of the school food authority and results of the Resource Management Risk Assessment Tool.	Resource Management Risk Assessment Tool: Required to be conducted offsite, with a SA option to interview further onsite. Comprehensive Resource Management Review: May be conducted offsite when the SA can adequately obtain needed documentation.
800- Civil Rights 210.18(h)(2)(ii)	Requirement: Observe meal service to ensure non-discrimination onsite. Recommendation: Validate the And Justice for All poster signage onsite.	Documentation review: May be completed offsite when the SA can adequately obtain needed documentation.

900- SFA On-site Monitoring 210.18(h)(2)(iii)	Requirement: School Food Authorities must conduct the monitoring reviews onsite per 7 CFR 210.8(a)(1) and 7 CFR 220.11(d)(1) .	Documentation review: May be completed offsite as long as the SA can adequately obtain any needed documentation.
1000- Local Wellness Policy 210.18(h)(2)(x)	Recommendation: Follow up on unanswered questions, concerns, and/or areas of noncompliance onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1100- Smart Snacks 210.18(h)(2)(iv)	Recommendation: Validate correct products and fundraisers onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1200- Professional Standards 210.18(h)(2)(ix)	Recommendation: Interview SFA personnel to determine compliance with Professional Standards requirements and to validate information gathered offsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1300- Water 210.18(h)(2)(v)	Recommendation: Validate access to water onsite.	
1400- Food Safety /Storage 210.18(h)(2)(vi) 210.13(d)	Recommendation: Validate posting of Food Inspection Report onsite. Recommendation: Review storage documentation (e.g., temperature logs) onsite. Recommendation: Walk through storage areas (cold/dry) onsite. Recommendation: Review meal service operation to ensure food safety compliance onsite.	Hazard Analysis Critical Control Point (HACCP) manual review: May be conducted offsite when the SA can adequately obtain any needed documentation. Health inspection dates: May be reviewed offsite when the SA can adequately obtain any needed documentation.
1400- Buy American 210.21(d)	Recommendation: Validate Buy American food labels/products onsite.	Documentation (e.g., solicitations) review: May be completed offsite and in line with any procurement oversight when the SA can adequately obtain any needed documentation.
1500- Reporting and Recordkeeping 210.18(h)(2)(vii)	Recommendation: Follow up on unanswered questions, concerns, and/or areas of noncompliance onsite.	Documentation review: May be completed offsite and through staff interview when the SA can adequately obtain any needed documentation.
1600- SBP and SFSP Outreach 210.18(h)(2)(viii)	Recommendation: Follow up on unanswered questions, concerns, and/or areas of noncompliance onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1700- Afterschool Snack 210.18(e)(3)(i)	Recommendation: Observe snack service at the SA's discretion.	Documentation review (menu, meal counts): May be completed offsite when the SA can adequately obtain any needed documentation.
1800- Seamless Summer 210.18(e)(3)(ii)	Requirement: Review meal counting and claiming and observe meal service onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1900- Fresh Fruit and Vegetable Program 210.18(e)(3)(iii)	Requirement: Review FFVP service onsite.	Claim validation: SA has discretion to validate claims (including the limit of 10% for

		administrative costs and allowable food and non-food purchases, claim system records) offsite when the SA can adequately obtain any needed documentation.
2000- Special Milk Program 210.18(e)(3)(iv)	Requirement: Review onsite if the SA has identified documentation problems or meal counting or claiming errors in the reviews conducted under the National School Lunch Program or School Breakfast Program.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
2100- Special Provisions 245.9	Requirement: Review meal counting and claiming and observe meal service onsite.	Documentation review: Claims and claiming percentages may be completed offsite when the SA can adequately obtain needed documentation.
Pre-K Checklist, AR Manual, page 70	Requirement: Complete review activities onsite given the connection to meal pattern review and meal service observation.	
Entrance Conference 210.18(i)(1)	Recommendation: Conduct onsite to increase rapport and allow for questions. At a minimum, conduct a meeting once the SA arrives onsite to start the review, confirm activities, and determine key contacts for the review, etc.	May take place offsite/virtually.
Exit Conference 210.18(i)(2)	Recommendation: Conduct onsite to increase rapport and allow for questions. At a minimum, conduct a meeting at the conclusion of the onsite review to summarize assessment and outline timeframes, corrective action plan etc.	May be conducted offsite/virtually.

Appendix

On-site/Off-site Monitoring Guidance

Summer Food Service Program (SFSP)

In response to State agencies and sponsoring organizations implementing innovative solutions to conduct off-site reviews and provide oversight of the SFSP during the public health emergency, FNS has developed the following guidance for conducting off-site monitoring. The review must take place at the sponsor's or site's location, though portions may be conducted at the State or sponsor's office, informally known as the 'desk review' or 'desk audit' portion. There may be a combination of reviews conducted to complete the Program review. For instance, the State agency monitor may evaluate the sponsor's single audit, budget, and training attendance via desk review and conduct the balance of the evaluation of the institution's Program on-site. Please note that these on-site and off-site strategies apply to both congregate and non-congregate meal service options.

Tips and Best Practices:

1. Plan ahead and communicate.
2. Develop a standard process.
3. Consider feasibility of a hybrid approach
 - a. Obtain documents through a secure platform to ensure personally identifiable information is secure.
 - b. Conduct the exit interview via video conferencing as an off-site approach.
4. Develop checklists and tools to ensure operators are aware of on-site and off-site review requirements and documentation submission procedures.
 - a. Request additional information as needed to resolve issues found in the off-site portion.
5. Document any off-site elements of the review.
6. Practice using a secure file sharing platform among staff before conducting a review.
7. Evaluate your established review standard procedures and make modifications to reflect latest learned strategies.

SFSP State Agency Review Content

Review Element and Regulations	Procedures to be Conducted On-site	Procedures with Option to be Conducted Off-site
Food Service Management Company Registration (7 CFR 225.6(k))		Request and obtain a copy of the registration document. May evaluate the registration document as part of a desk audit.
Monitoring of food service management company procurements (7 CFR 225.6(l))	Visits conducted to inspect facilities are to be conducted on-site.	Evaluate copies of State or local health certifications, contracts, books, and records pertaining to the sponsor's food service operation as part of a desk audit.
Meal Ordering (7 CFR 225.6(l)(2)(iv))		Evaluate invoices, delivery receipts, and meal counts as part of a desk audit.
Pre-approval Visits (7 CFR 225.7(d))	Pre-approval visits must be conducted on-site.	
Review of Sponsor and Site Reviews (7 CFR 225.7(e))	Reviews must be conducted on-site.	
Meal Claim Validation (7 CFR 225.7(e)(6))		Request and obtain copies of meal counts, delivery receipts, and or production records. Conduct reconciliation as part of a desk audit.
Follow up Reviews (7 CFR 225.7(f))	Visits conducted to inspect facilities are to occur on-site.	Request and obtain copies of written corrective action and supporting documentation, for example, a corrected menu for a meal pattern violation.
Records (7 CFR 225.7(h))		Request a sample of records to cover the scope of the last three years plus the current year (dated invoices, training, mileage log, etc.).
Meal Preparation Facility Reviews (7 CFR 225.7(i))	Visits conducted to inspect facilities are to occur on-site.	
Corrective Action (7 CFR 225.7(k))	Conduct a follow-up visit or in some other manner verify that the specified corrective action has been taken.	Conduct a follow-up visit or in some other manner verify that the specified corrective action has been taken.
Other Facility Inspections and Meal Quality Tests	Visits conducted to inspect facilities are to occur on-site.	

(7 CFR 225.7(l))		
Financial Management (7 CFR 225.7(m))		Request and obtain documentation of the net cash resources of the nonprofit food service account. Evaluate these records as part of a desk audit.
Training and Monitoring (7 CFR 225.7(j))	The reviewer must ensure that at least one person who has received SFSP training is present at each meal service.	Request and obtain copies of dated training materials and agendas and attendee sign in sheets. If training is conducted virtually, obtain dated confirmation. Request and obtain copies of site review forms, schedules, and tracking logs.
Sponsor Site Visit (7 CFR 225.7(o))		Request and obtain documentation of site visits and review forms for sites that had operational problems in the year prior.
Notification to the Community (7 CFR 225.15(e))		Request and obtain the media release and marketing materials for the Program.

SFSP Sponsor Review Content

Review Element	Procedures to be Conducted On-site	Procedures with Option to be Conducted Off-site
Meal Ordering (7 CFR 225.15(b))		Request records of participation from sites, review approved levels of meal service, and keep records of meal ordering adjustments.
Records and claims (7 CFR 225.15(c))		Sponsors must maintain records to cover the scope of the last three years plus the current year (dated invoices, training, mileage log, meal counts, etc.).
Food Service Operations (7 CFR 225.15(d)(3))	Visits conducted to verify food service operations are to occur on-site.	
Meal Service (7 CFR 225.15(d)) (7 CFR 225.16(b))	Visits conducted to verify meal service operations are to occur on-site. At least one full meal service must be observed.	
Training and monitoring (7 CFR 225.15(d)(1))	The reviewer must ensure that each site has present at each meal service at least one person who has received SFSP training.	Request and obtain copies of dated training materials and agendas and attendee sign in sheets. If training is conducted virtually, obtain dated confirmation.
Training and monitoring (7 CFR 225.15(d)(2)) (7 CFR 225.15(d)(3))	The sponsor must visit each of their sites, including a full review of food service operations during the first four weeks of Program operations.	
Food Service Management Companies (7 CFR 225.15 (m))	Visits conducted to inspect facilities are to be conducted on-site to ensure the operator is in conformity with its agreement with the State agency and contract with the sponsor.	Sponsors must maintain records including but not limited to bids, contracts, site visits and reviews, etc.
Meal Preparation (7 CFR 225.16(a))	Visits conducted to verify meal preparations operations are to occur on-site.	
Meal Pattern Requirements (7 CFR 225.16(d))	Requirement: Validate meal items/components and quantities, complete meals, and meal signage on day of review onsite.	Request and obtain copies of menus. Evaluate menus for compliance with meal pattern requirements.

<p>Civil Rights Compliance – FNS INSTRUCTION 113-1 Civil Rights Compliance and Enforcement – Nutrition Programs and Activities</p>	<p>Visits conducted to verify civil rights compliance are to occur on-site to ensure compliance requirements are routinely implemented and the “And Justice for All” poster is displayed.</p>	<p>Request civil rights training logs and attendee sign in sheets. If training is conducted virtually, obtain dated confirmation. Verify that civil rights data submitted for the eligible population is from a credible source (U.S. Census data).</p>
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Appendix

On-site/Off-site Monitoring Guidance

Child and Adult Food Care Program (CACFP)

In response to State agencies and sponsoring organizations implementing innovative solutions to conduct off-site reviews and provide oversight of the CACFP throughout the public health emergency, FNS has developed the following guidance for conducting off-site monitoring. The review must take place at the institution or facility's location, though portions may be conducted at the State or sponsoring organization's office, informally known as the 'desk review' or 'desk audit' portion. There may be a combination of reviews conducted to complete the Program review. For instance, the State agency monitor may evaluate the institution's single audit, budget, and training attendance via desk review and conduct the balance of the evaluation of the institution's Program on-site.

Tips and Best Practices:

1. Plan ahead and communicate.
2. Develop a standard process.
3. Consider feasibility of a hybrid approach.
 - a. Obtain documents through a secure platform to ensure personally identifiable information is secure.
 - b. Conduct the exit interview can be conducted via video conferencing as an off-site approach.
4. Develop checklists and tools to ensure operators are aware of on-site and off-site review requirements and documentation submission procedures.
 - a. Request additional information as needed to resolve issues found in the off-site portion.
5. Document any off-site elements of the review and interviews.
6. Practice using a file sharing platform among staff before conducting a review.
7. Evaluate your established review standard procedures and make modifications to reflect latest learned strategies.

CACFP State Agency Review Requirements

Requirement	Procedures to be Conducted On-site	Procedures with Option to be Conducted Off-site
Recordkeeping (7 CFR 226.6(m)(3)(i))		Request a sample of records to cover the scope of the last three years plus the current year (dated invoices, training, mileage log, etc.).
Meal counts (7 CFR 226.6(m)(3)(ii))	Visits conducted to verify meal counts (accuracy/up to date) are to occur on-site.	
Administrative costs (7 CFR 226.6(m)(3)(iii))		Request and obtain the approved budget and/or amendments, dated invoices and receipts, additional financial records, as needed.
Applicable instructions and handbooks issued by FNS (7 CFR 226.6(m)(3)(iv))	The reviewer can be on-site to observe that all applicable instructions and handbooks have been implemented.	To meet the intent of this requirement, the reviewer can evaluate documentation that demonstrates that all applicable instructions and handbooks have been implemented.
Facility licensing and approval (7 CFR 226.6(m)(3)(v))	The reviewer must be on-site to observe the number of children and their ages. License must be displayed, as directed by the State agency.	Request and obtain a photo or video of the posted license.).
Compliance with the requirements for annual updating of enrollment forms (7 CFR 226.6(m)(3)(vi))		Request and obtain the enrollment forms for each enrolled participant. Be sure to use a secure file sharing platform to protect personally identifiable information.
If an independent center, observation of a meal service (7 CFR 226.6(m)(3)(vii))	Meal service observations are to occur on-site.	
If a sponsoring organization, training and monitoring of facilities		Request and obtain copies of dated training materials and agendas and attendee sign in

(7 CFR 226.6(m)(3)(viii))		<p>sheets. If training is conducted virtually, obtain dated confirmation.</p> <p>Request and obtain copies of monitoring forms, schedules, and tracking log.</p>
If a sponsoring organization of day care homes, implementation of the serious deficiency and termination procedures (7 CFR 226.6(m)(3)(ix))		Request and obtain records related to serious deficiency declarations, terminations, and appeals for daycare home providers.
If a sponsoring organization, implementation of the household contact system (7 CFR 226.6(m)(3)(x))		Request and obtain records related to the implementation of household contacts (written policies and procedures, records of contacts, etc.).
If a sponsoring organization of day care homes, the requirements for classification of tier I and tier II day care homes (7 CFR 226.6(m)(3)(xi))		Request and obtain records (census data, school data, provider income, etc.) used to classify daycare homes as tier I and tier II.
All other Program requirements (7 CFR 226.6(m)(3)(xii))	Visits conducted to verify Civil Rights compliance are to occur on-site ensuring compliance requirements are routinely implemented and the “And Justice for All” poster is displayed.	

CACFP Sponsoring Organization Review Content

Review Element	Procedures to be Conducted On-site	Procedures with Option to be Conducted Off-site
The meal pattern (7 CFR 226.16(d)(4)(i)(A)) (7 CFR 226.16(d)(4)(i)(E))	Requirement: Validate meal items/components and quantities, complete meals, and meal signage on day of review onsite.	Request and obtain copies of menus. Evaluate menus for compliance with meal pattern requirements.
Licensing and approval (7 CFR 226.16(d)(4)(i)(B))	The reviewer must be on-site to observe the number of children and their ages. License must be displayed, as directed by the State agency.	Request and obtain a photo or video of the posted license.).
Attendance at training (7 CFR 226.16(d)(4)(i)(C))	The reviewer must ensure that the facility has CACFP-trained staff/volunteers on-site during meal service.	Request and obtain copies of dated training materials and agendas and attendee sign in sheets. If training is conducted virtually, obtain dated confirmation.
Meal counts (7 CFR 226.16(d)(4)(i)(D))	Visits conducted to verify meal counts (accuracy/up to date) are to occur on-site.	
Menu and meal records (7 CFR 226.16(d)(4)(i)(E))	The reviewer must observe that the dated menu is displayed at the facility. The reviewer must evaluate supporting documentation (dated invoices/receipts, delivery tickets, documentation of whole grain-rich, sugar in cereal/yogurt, etc.)	Request and obtain copies of dated menus and supporting documentation (dated invoices/receipts, delivery tickets, documentation of whole grain-rich, sugar in cereal/yogurt, etc.). Request and obtain a photo or video of the displayed dated menu.
Annual updating and content of enrollment forms (7 CFR 226.16(d)(4)(i)(F))		Request and obtain the enrollment forms for each enrolled participant. Be sure to use a secure file sharing platform to protect personally identifiable information.
Five-day reconciliation of meal counts (7 CFR 226.16(d)(4)(ii))	On the day of review (on-site meal service observation) the reviewer must obtain and	

	evaluate the daily attendance and meal counts for a five-day period prior to the day of review.	
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MONITORING MEMOS

As noted above that it was announced the PHE will end May 11, 2023. These monitoring waivers approved last year will expire June 10, 2023. To prepare for the expiration of the nationwide onsite monitoring waivers impacted by this date, FNS issued memoranda for the CACFP, SFSP and School Meal Programs. They provide guidance on the oversight and monitoring of these programs once the PHE ends on May 11, 2023. Please note the appendix accompanying each program’s memorandum as they present onsite and offsite strategies for State Agencies and local operators.

Please review the FNS MEMOS:

SFSP 06-2023 Appendix
SFSP-2023

CACF 07-2023 Appendix
CACFP 07-2023

SP 12-2023 Appendix
SP 12-2023

Please keep this memo on file for quick and easy reference. A copy is also available on the Resource Library under COVID-19 Memos 2023. If you have any questions regarding this memo, please contact your Application Coordinator at. Thank you so much for all that you do to feed the children of Arkansas.

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