

**COVID-19
NATIONWIDE
WAIVER
FLEXIBILITIES
FOR
CNP SPONSORS**

WAIVERS, MEMOS and Q&As

**SY 2020-
2021**

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ALSDE CNP School Programs



Click on the link below to access the recorded presentation:

<https://alsde.webex.com/alsde/lr.php?RCID=8bd1b65d71304a06a66a4a7a71196b47>

WAIVER PRESENTATION

Review of USDA COVID19 Waivers

presented by

National School Lunch Programs and Summer Food Service Programs

Alabama State Department of Education

AGENDA

**Wednesday
February 24, 2021**

Virtual Presentation

Montgomery, AL



1:30 – 1:35	Log In/House Keeping/Welcome	Robbie Scott Education Specialist ALSDE
1:35 – 2:00	Waivers Related to SFSP and CACFP	Ben Guthrie Education Administrator ALSDE, SFSP
2:00 – 2:25	Waivers Related to NSLP	Julie Autrey Education Specialist ALSDE, NSLP
2:25 – 2:30	Q&As*/Wrap Up	Robbie Scott

*Please present questions in the 'Chat Box' on your screen. Responses to questions will be compiled and emailed following the presentation.

COVID-19 KEY FLEXIBILITIES

SY21 Program Participation:

NSLP

SBP

SSO

SFSP

CACFP



OVERVIEW

1. KEY FLEXIBILITIES through COVID-19
 - Waivers in effect till June 30, 2021
 - Waivers in effect till September 30, 2021
2. SFSP State agencies Traditional Waivers
3. Monitoring and Reviews waivers during COVID-19
4. Reporting of Nationwide Waivers
5. Additional Waivers
6. FFVP
7. Q&As & Memos
5. Program Integrity and Accountability during COVID-19 Child Nutrition Meal Service
6. Helpful Resources and Questions



#59

SFSP & SSO
OPERATIONS
through
SCHOOL YEAR
2020-2021

Expires June 30, 2021



#59

SFSP & SSO OPERATIONS through

SCHOOL YEAR 2020-2021

EXPIRES JUNE 30, 2021



Allows the SFSP and SSO to continue to operate through the school year, regardless of school operating status.



Eliminates the need to collect meal payments and allows all children under 18 and under to eat free.



Operators must get advanced approval from their state agency.



Allows use of all SFSP and SSO Nationwide Waivers



SFAs may choose either SFSP or SSO. The waiver does not require SFSs to transition to SFSP or SSO

Talladega City



#34 & #66

MEAL SERVICE TIME
FLEXIBILITIES

EXPIRES JUNE 30, 2021

MEAL SERVICE TIME FLEXIBILITIES



Applicable to all CNP Programs. State agencies may elect to be subject to this waiver or their traditional waiver, if requested and approved. Traditional waivers will remain in effect until

April 30, 2022 for SFSP Sponsors



Meals may be served outside traditional times to maximize flexibility for meal pick-up



Allows serving multiple meals for up to seven days, and meal delivery. Including bulk meals.



Operators must still establish meal service times or delivery times on the online agreement.

#33 & #64

NON-CONGREGATE
FEEDING
IN CHILD NUTRITION
PROGRAMS

EXPIRES JUNE 30, 2021



#33 & #64

NON-
CONGREGATE
FEEDING
in Child Nutrition
Programs

Expires June 30, 2021



Applicable to all CNP programs



Allows meals to be served in non-group settings to support social distancing



Allows for consumption of meals off-site and outside of group settings.

Grab-n-go
Curbside pick-up
Mobile/bus routes
Home delivery

#35 & #62

PARENT and
GUARDIANS TO
PICK UP MEALS FOR
CHILDREN

JUNE 30, 2021



#35 & # 62

PARENT and GUARDIANS TO PICK UP MEALS FOR CHILDREN

JUNE 30, 2021



Applicable to all CNP programs



Allows parents/guardians to pick-up meals to take home to their children.



Allows for distributing meals to parents or guardians without a child present.



States need to ensure integrity and are instructed to work with operators on ways to verify adults have eligible children and ensure that duplicate meals are not served.

63 & # 70

MEAL PATTERN
FLEXIBILITY IN THE
SFSP, SSO AND
OTHER
CHILD NUTRITION
PROGRAMS

EXPIRES JUNE 30, 2021



Applicable to all programs



Allows operators to serve meals that do not meet the meal pattern requirements during SY2021.



Waives the requirement for schools operating NSLP and SBP and to offer at least two types of milk NSLP .



Operators are expected to maintain nutrition standards for each program and must get advance approval from their state agency.



State should consider requests that are targeted and justified based on plans to support access to nutritious meals while minimizing potential exposure to COVID-19 during SY2021.



USDA directs State Agencies to only grant this waiver on a case-by-case basis and must inform their regional office when, where and for which components the waiver is in effect



ALSDE Waiver Requests:

Waiver requests were emailed from jragan@alsde.edu on 9/15/20

#60

AREA ELIGIBILITY WAIVER

EXPIRES JUNE 30, 2021



Applicable to SFSP and SSO



Extends all individually-issued state waivers allowing SFSP and SSO sponsors in good standing to operate **open** summer meal sites located in areas that do not meet the definition of “areas in which poor economic conditions exist,” where more than half of the children are eligible for free or reduced price meals.



Operators must make note on online agreement

#64

AREA ELIGIBILITY FOR CLOSED ENROLLED SITES IN THE SFSP AND SSO

EXPIRES JUNE 30, 2021



Applicable to SFSP and SSO



Allows closed enrolled sites to determine site eligibility through area eligibility (instead of collecting income eligibility applications).



State agencies may elect to be subject to this waiver or their traditional waiver, if requested and approved. Traditional waivers will remain in effect until

April 30, 2022

#68

AREA ELIGIBILITY IN
THE CACFP
AT-RISK
AFTERSCHOOL
CARE
COMPONENT

EXPIRES JUNE 30, 2021



Applicable to CACFP At-Risk



Waives the requirement that CACFP At-Risk Afterschool sites be located within the attendance zone of a school where at least half of students are eligible for free or reduced-price meals.



Aligns CACFP At-Risk Afterschool with the SFSP and SSO which have an area eligibility waiver

#65

WAIVER OF THE
FIRST WEEK
SITE VISIT
REQUIREMENT IN
THE SFSP

EXPIRES JUNE 30, 2021



Applicable to SFSP and SSO



Waives the requirement that SFSP Sponsors visit each of their sites at least once during their first week of operation. Waiver applies to Sites that successfully operated SFSP the previous year and SFSP sponsors that successfully operate the CACFP or NSLP.



State agencies may elect to be subject to this waiver or their traditional waiver, if requested and approved. Traditional waivers will remain in effect until **April 30, 2022**

#67

OFFER VERSUS SERVE (OVS) FLEXIBILITIES IN THE SFSP

EXPIRES JUNE 30, 2021



Applicable to SFSP only



Waives the limitation on the use of Offer versus Serve (OVS) to SFAs. Allows the use of OVS by both Non-SFS and SFA sponsors in good standing.



State agencies may elect to be subject to this waiver or their traditional waiver, if requested and approved. Traditional waivers will remain in effect until **April 30, 2022**

#71

FOOD SERVICE
MANAGEMENT
CONTRACT
DURATION IN NSLP
& SFSP

EXPIRES JUNE 30, 2021



Applicable to NSLP, SSO and SFSP



Waives FSMC contract duration and extension limits.



Allows FSMC contracts that may expire on or around June 30, 2021 to be extended to through SY2021-2022 ((to June 30, 22 using emergency non-competitive procurement. Contracts negotiated or extended through emergency procurement may not be renewed.

WAIVER OF ONSITE MONITORING REQUIREMENTS IN THE SUMMER FOOD SERVICE PROGRAM

EXPIRES SEPTEMBER 30, 2021

RESPONSE #42

Waives the requirement for an in-person site visit during the first week of a site's operation



Waives the site's foodservice review during the first four weeks of operation.



Sponsors must continue to ensure integrity to the maximum extent practicable through remote activities and desk audits.

ONSITE MONITORING REQUIREMENTS IN THE CHILD AND ADULT CARE FEEDING PROGRAM

EXPIRES SEPTEMBER 30, 2021

RESPONSE #27, #39

#27 Allows sponsors to monitor facilities two times (instead of three) this fiscal year, and only one must be unannounced.

- Waives the requirement for at least one unannounced review to include the observation of a meal service.
- Waives the requirement that no more than six months elapse between reviews.
- Allows new facility reviews to be done by desk audit. New facility reviews must still be done within the facility's first four weeks of operations.

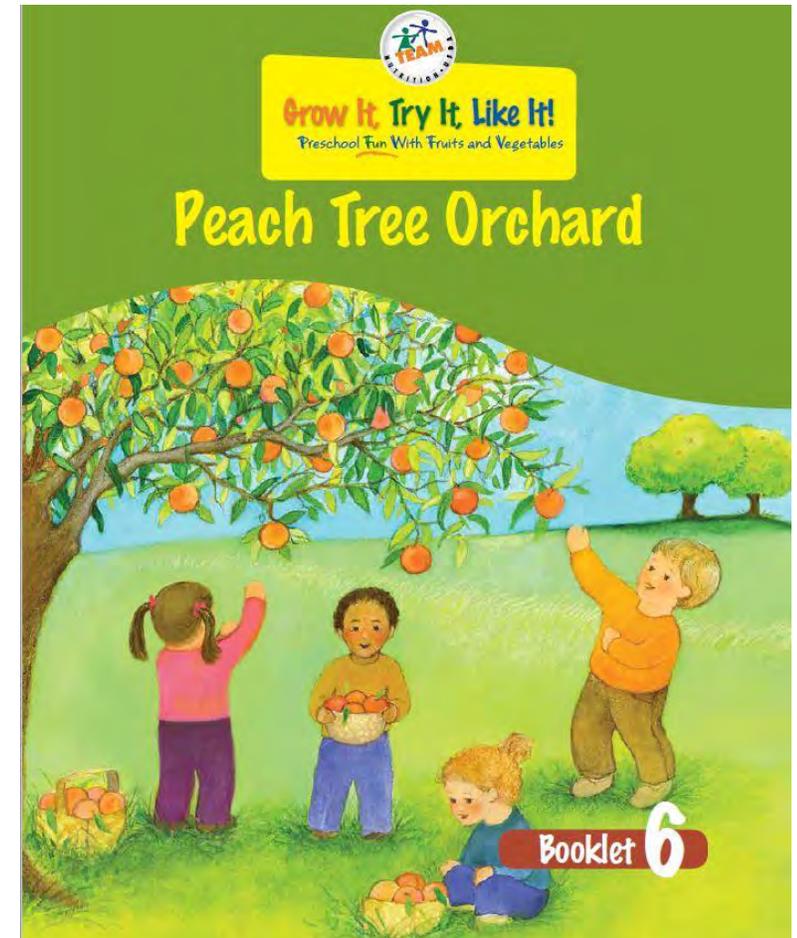
#39 Waives the in-person component of a sponsor's required monitoring activities.

- Sponsors should conduct reviews as required to the maximum extent possible and sponsors must continue to ensure integrity to the maximum extent practicable through remote activities and desk audits.

#3 WAIVER OF ACTIVITY REQUIREMENT IN AFTER SCHOOL CARE CHILD NUTRITION PROGRAMS

NSLP Afterschool Snacks & CACFP At-Risk Afterschool Expired 6/30/2020.

- Program operators may consider offering:
 - Online homework assistance, activity packets, electronic games and books, or other e-learning activities for the children to partake in at home.
 - For example, Team Nutrition offers a variety of online games, books, and nutrition education activities for children at: <https://www.fns.usda.gov/tn/digital-nutrition-resources-kids>.
 - Although children are not required to participate in or complete the activity in order to receive an afterschool meal or snack, the afterschool care center must offer the activity.
- As customary with CACFP At-Risk, activities must be available to all who receive meals, but participation is not required.
 - At-risk afterschool care centers providing non-congregate meals under *Nationwide Waiver to Allow Non-congregate feeding in the Child Nutrition Program – Extension #2* must comply with the requirement to provide an education or enrichment activity (7 CFR 226.17a(b)(1)). However, under the non-congregate and parent pick-up waivers, these activities may be conducted virtually or in other non-congregate ways.



ADDITIONAL WAIVERS,
FLEXIBILITIES and
GUIDANCE
RELATED
TO SCHOOL
PROGRAMS



REPORTING OF NATIONWIDE WAIVERS



- State Agency is required to submit a report to USDA no later than one year after receipt of each waiver.
 - A summary of the use of this waiver by the State agency and local program operators, and
 - A description of whether this waiver resulted in improved services to children.
- Local Program operators participating under the waivers are required to maintain records to document compliance with Program requirements and should maintain documentation of their participation for future reviews.
 - Questionnaires and Surveys were emailed from jragan@alsde.edu
 - Operators submitted surveys and questionnaires to opt-in to the waivers.
 - Documentation of the answers to the questionnaire will be reviewed during an audit.

RESPONSE #41

ONSITE MONITORING REQUIREMENTS IN THE NSLP SCHOOL MEALS PROGRAMS

*NSLP Reviews for each site by February 1.

*SSO Reviews for each site to be completed annually.

On-site monitoring is not required.

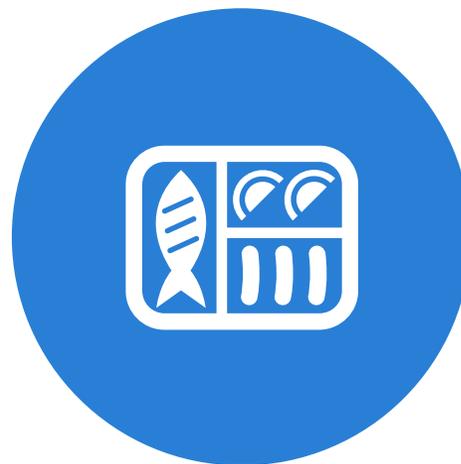
Instead, to the maximum extent possible, sponsors should review Program operations off-site by desk audit



RESPONSE #18

LOCAL SCHOOL

WELLNESS POLICY ASSESSMENTS



RESPONSE #37

OFFER VS SERVE IN

SENIOR HIGH SCHOOLS

ADDITIONAL WAIVERS

FFVP GUIDANCE





USDA MEMOS related to FFVP

SP 12-2020 4-9-20

- Approval of non-congregate setting.
- May be served to children even if they are not enrolled in a participating school.
- May be served outside the typical school day alongside other meals being distributed but may not be used as meal components for other meals.
- May serve up to one week at a time.

SP 19-2020 5-19-20

- May serve children of all ages.
- May not retain funds for next school year.
- May reallocate funds from elementary schools not serving meals to participating elementary schools that are.

SP 23-2020 8-21-20

- FFVP can be provided outside of a regular school day and with grab-n-go/curbside meals.
- Elementary schools that are providing multiple days of meals, may also provide multiple servings of FFVP foods.

SP 3-2021 10-23-20

- Flexibilities are still in place for service times for in person and hybrid schedules.
- FFVP may be served to all children through SSO/SFSP.
- May reallocate funds from elementary schools not serving meals to participating elementary schools that are.
- If fresh produce cannot be used and would need to otherwise be disposed of, the produce may be donated to another FFVP school, food bank or 501(c)3
- **Reiterates that state waivers are required for:**
 - Parent guardian pick up without their child present.
 - Serving from sites that are not approved FFVP elementary schools.

USDA APPROVED ALABAMA FFVP WAIVERS FOR SY 2020-2021

On August 28th USDA approved Alabama's FFVP waiver for SFAs to distribute FFVP foods to a parent or guardian to take home to their children through June 30, 2021.



On September 28th USDA approved an extension for Alabama's waiver allowing SFAs to serve FFVP foods at sites that are not elementary schools through June 30, 2021.

1

All SFAs who accepted applications before October 1 must carry out verification.

2

Verification of applications must be finished by February 28, 2021.

3

Verification Summary Report must be submitted by March 8, 2021.

VERIFICATION

TEAM NUTRITION GUIDANCE RELATED TO PARENT PICK UP, MULTIPLE MEALS, AND BULK MEALS: RELEASED 9/21/20

Team Nutrition COVID-19 Resources

Resource Type

Technical Assistance & Guidance

The following Team Nutrition resources discuss the flexibilities and child nutrition program adjustments to ease meal service operations and protect the health of children and program operators during the coronavirus (COVID-19) pandemic.



[School Meals Programs: Providing Multiple Meals at a Time During the Coronavirus \(COVID-19\) Pandemic](#)



[Seamless Summer Option: Providing Multiple Meals at a Time During the Coronavirus Pandemic](#)



[Summer Food Service Program: Providing Multiple Meals at a Time During the Coronavirus Pandemic](#)



[Child and Adult Care Food Program: Providing Multiple Meals at a Time During the Coronavirus \(COVID-19\) Pandemic](#)



[Providing Bulk Meals to Schools and Child Care Centers \(See for Coronavirus \(COVID-19\)\)](#)



[Child Nutrition Program Meal Service During Disasters \(SNAP-34\)](#)

- [School Meals Programs: Providing Multiple Meals at a Time During the Coronavirus \(COVID-19\) Pandemic | USDA-](#)
- [Child and Adult Care Food Program: Providing Multiple Meals at a Time During the Coronavirus Pandemic | USDA-FNS](#)

Q&A GUIDANCE RELATED TO MEAL DELIVERY: WITH STATE AGENCY APPROVAL

USDA MEMO DATED 4/4/20
STATE MEMO DATED 8/7/20



- Allows direct to home and mobile feeding.
 - Sponsor must obtain written consent from households for home delivery.
 - Postage or delivery fees are allowable expenses.
- Allows service of two meals per day, per child up to one week at a time.
- Public notification is required.
- Requires accommodations for limited English proficiency, language assistance or other special needs.



Q&As RELATED TO CIVIL RIGHTS

- The nondiscrimination statement must still appear on informational materials.
- It is not feasible or cost-effective to require that each classroom in a school display an And Justice for All Poster.
 - You may display posters in prominent locations throughout the school, such as a bulletin board in the main building entrance, the school office, or another area frequently visited by parents.
- Racial and ethnic data can be collected through school enrollment, ALSDE information or DHR-SNAP.
- Operators must still make meal accommodations for participants with disabilities.

WATER REQUIREMENTS



- According to Memo SP 24-2020:
 1. Are schools required to provide potable water to students eating lunch at school when lunch is served in the classroom? **Yes.**
 2. Are schools required to provide potable water to students eating breakfast at school when breakfast is served in the classroom? **No.**
 3. Are schools required to provide potable water to students who are doing virtual learning and who are not eating lunch at school? **No.**

Can teachers be provided a meal with lunch in the classroom like breakfast in the classroom?

Yes, only if they conduct meal counts.

- FNS Instruction 782-5 “Meals served to adults who are directly involved in the operation and administration of the school nutrition programs may **at the discretion of the SFA be furnished at no charge.**”
- SP 17-2017 SSO/SSFP Under SSO -“Program Adults work directly with the meal service at the site as either volunteers or paid employees. Meals may be served free to adults who meet this definition.”
- ALSDE Financial Management 2020: Meals served to adults that are directly involved in the production and service of the meals to children are considered program related adults. Meals may be served without charge to CNP employees at the discretion of the school board or School Food Authority (SFA). Meals served to CNP employees are allowable costs of the non-profit food service operation. CNP employees are defined as those employees that are responsible for the preparation, service, or operation of the CNP and paid 100% from CNP funds (Funding Source 5101). At no time may employees that are non-program employees be provided meals without charge, **except for employees conducting meal counts for meals served in the classroom.** Principals of schools are not entitled to receive meals free of charge. The school district must reimburse the CNP for non-program adult meals provided without charge.

SFAs may operate different CNP Programs within a school district based on the needs of each school.

SFAs may operate NSLP/SBP, SSO or SFSP.

- As permitted by earlier guidance, meals may be served through SFSP or SSO on weekends and holidays during the school year.

SFAs may operate Afterschool Snack through NSLP, SSO or CACFP together with with any of these programs.

- Children can not receive more than the number of reimbursable meals allowed in an individual program.

PROGRAM
INTEGRITY and
ACCOUNTABILITY



PROGRAM INTEGRITY AND ACCOUNTABILITY OPTING INTO COVID-19 WAIVERS

01

Impact reports must be submitted by the State to USDA within a year.

- Summarize use of the waivers
- Summarize how waivers improved meal service

02

Three Questionnaires were emailed to sponsors to opt-in to waivers:

- 7/9/20 – Waivers #1 - #32
- 9/4/2020 – Waivers #33 - #56
- 1/5/2021 – Waivers #57- #70

03

Schools and CACFP providers are *not* obligated to utilize flexibilities like the non-congregate waiver.

However, if you opt-in, you must make meals available for all enrolled children, including remote learners and those who are not physically present.

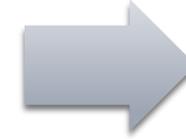
PROGRAM INTEGRITY AND ACCOUNTABILITY

During Covid-19 Child Nutrition Program Meal Service

State Memo
March 27, 2020

Ensure parents have eligible children.

- Valid child ID
- School ID card
- Sign up for meals or order ahead.



Ensure duplicate meals are not served.

- School Rosters
- Daily parent/guardian pickup roster
- Punch card for meal pickup

_____ School District

Monday Tuesday Wednesday Thursday Friday Saturday Sunday

Date Issued: _____

Issued by: _____

PARENT/GUARDIAN NAME: _____

LIST CHILDREN 18 & UNDER IN HOUSEHOLD:

1.
2.
3.
4.
5.



HELPFUL RESOURCES

- Child Nutrition COVID-19 Waivers | USDA-FNS

- No Kid Hungry | Summary of COVID-19 Child Nutrition Program Response Nationwide Waivers & Memos





School Food Authority Monitoring of the School Meal Programs School Year 2020-2021¹

Off-site Monitoring During the COVID-19 Public Health Emergency Issued November 2020

During the current public health emergency school food authorities may forgo on-site monitoring and instead, to the maximum extent practicable, review Program operations off-site (e.g., through a desk audit). [COVID-19: Child Nutrition Response #41: Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the School Meal Programs](#) is in effect through June 30, 2021. This waiver allows for all review elements found at 7 CFR 210.8 and 220.11 to be conducted off-site for the National School Lunch Program and School Breakfast Program. School food authorities are required to complete these reviews annually by February 1 unless a waiver of this requirement has been approved.

Off-site Monitoring Strategies

The required review elements found at **7 CFR 210.8 and 220.11** can be completed off-site by reviewing documents, electronic systems, or by using other means of technology. Off-site, school food authorities may review and verify records that have been texted, emailed, or otherwise provided, or through virtual observation, for example, by using video. School food authorities may also conduct interviews with school staff and Program participants to verify information in photos via telephone or video conference. School food authorities may wish to use the [Food and Nutrition Service on-site review checklist](#) or other means to document that the review was completed. School food authorities should use the documentation and information provided by the site to answer any questions in the checklist or otherwise document the information required to complete the review.

When using technology such as video or photos, Program operators should follow any Federal and State laws related to technology use and privacy. Information that contains Personally Identifiable Information (PII), such as applications or benefit status, should be protected. Information shared by Program operators should be password protected or sent via other secure methods to ensure privacy.

School food authorities should record details to thoroughly document off-site monitoring, including, but not limited to:

- The time and date the review was conducted;
- Names and contact information of school food authority staff interacted with virtually; and
- Any technical assistance the school food authority provided.

If any of the required review elements cannot be fully completed within the required review time frame school food authorities may request additional waivers of statute or Program regulations to ensure compliance with oversight responsibilities. [Child Nutrition Program Waiver Request Guidance and Protocol- Revised](#) describes the waiver request process.

¹ The content of this document does not have the force and effect of law and is not meant to bind the public in any way. This document is intended only to provide clarity regarding existing requirements.

USDA FACT SHEETS
RELATED TO
SFA MONITORING OF
THE SCHOOL MEAL
PROGRAMS
FY2021

OFF-SITE MONITORING



Sponsor Monitoring of the Summer Food Service Program Federal Fiscal Year 2021¹

Off-site Monitoring During the COVID-19 Public Health Emergency Issued November 2020

During the current public health emergency Sponsoring Organizations may forgo on-site monitoring and instead, to the maximum extent practicable, review Program operations, off-site (e.g., through a desk audit). [COVID-19 Child Nutrition Response #42: Nationwide Waiver of Onsite Monitoring Requirements for Sponsors in the Summer Food Service Program](#), in effect until September 30, 2021, allows sponsoring organizations to conduct monitoring requirements in the Summer Food Service Program (SFSP) off-site. Frequency and timing of SFSP sponsor reviews is pursuant to Program regulations unless their State agency has an alternative approach approved through an individual State agency oversight waiver.

Off-site Monitoring Strategies

When conducting off-site reviews, sponsor organizations should review all elements of Program operations that they would normally review while on-site to the best of their ability. This includes review elements as required by **7 CFR 225.15**. This includes all the review elements outlined in the monitoring review forms developed by the sponsoring organization's State agency these elements can be completed by using other means of technology. Off-site monitoring through a desk review can be conducted by reviewing records that have been emailed, mailed, faxed, or delivered to the sponsoring organization. For example, monitors may evaluate Program documentation related to monitoring, food delivery tickets, food safety, sanitation, health inspections, meal count sheets, and civil rights via desk review.

In situations where direct observation normally occurs, such as observation of meal delivery or preparation, meal pattern components, point of service meal counting, verification of attendance and health and safety issues, alternative observation can be conducted virtually by using video and/or photos of meal preparation and meal service. Sponsoring organizations may also conduct interviews with site supervisors and Program participants to verify information in photos via telephone or video conference. Below are examples of documentation which can be reviewed through off-site means. The below list is not all encompassing and reviewers should, to the best of their ability, complete review components outlined in their State agency developed review forms.

- ✓ **Meal count records** (review meal counts for more than one day to ensure daily meal counts are being recorded) - Review scanned copy, picture, or video.

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- ✓ **Menus and other food service records**; such as production records if used, to ensure meal pattern compliance - Review scanned copy, picture, or video.
- ✓ **Meal delivery receipts** - Review scanned copy, picture, or video.
- ✓ **Health and safety inspections*** - Review scanned copy, picture, or video.
- ✓ **"And Justice for All" Poster** - verify via photos and/or video that the "And Justice for All" poster is displayed in institutions.
- ✓ **Income Eligibility Forms, if applicable** - for camps, National Youth Sports Program and closed enrolled sites, verify that income eligibility forms are available for all enrolled participants that are listed as receiving free or reduced-price meals.

When using technology such as video or photos, sponsoring organizations should follow all Federal and State laws related to technology use and privacy. Information that contains Personally Identifiable Information (PII), such as applications or benefit status, should be protected. Information shared by Program operators should be password protected or sent via other secure methods to ensure privacy.

Off-site Monitoring Documentation

Sponsoring organizations should continue to record details to thoroughly document off-site monitoring, including, but not limited to:

- The time and date the review was conducted;
- Names and contact information of site staff that participated virtually; and
- Any technical assistance provided.

If any of the required review elements cannot be fully completed within the required review timeframe, sponsors may request additional waivers of statute or Program regulations to ensure compliance with oversight responsibilities. [Child Nutrition Program Waiver Request Guide and Protocol- Revised](#) describes the waiver request process.

USDA FACT SHEETS RELATED TO SPONSOR MONITORING OF THE SUMMER FOOD SERVICE PROGRAM FY2021

OFF-SITE MONITORING

USDA FACT SHEETS RELATED TO SPONSORING ORGANIZATION MONITORING OF THE CHILD AND ADULT CARE FOOD PROGRAM FY2021

OFF-SITE MONITORING



Sponsoring Organization Monitoring of the Child and Adult Care Food Program Federal Fiscal Year 2021¹

Off-site Monitoring During the COVID-19 Public Health Emergency Issued November 2020

During the current public health emergency sponsoring organizations may forgo on-site monitoring and instead review Program operations off-site (e.g., through a desk audit). [COVID-19: Child Nutrition response #39: Nationwide Waiver of Onsite Monitoring Requirements for Sponsors in the Child and Adult Care Food Program](#), in effect until September 30, 2021, allows sponsoring organizations to complete Child and Adult Care Food Program (CACFP) monitoring requirements off-site.

[Please note the flexibilities included in COVID-19: Child Nutrition Response #27 were effective through August 31, 2020](#). Once expired, CACFP sponsors are expected to transition back to meeting the number of CACFP review requirements outlined in Federal regulations unless a waiver of this requirement has been approved.

Off-site Monitoring Strategies

When conducting off-site reviews, sponsoring organizations should review all elements of Program operations that they would normally review while on-site to the best of their ability. This includes all of the review elements found at [7 CFR 226.16\(d\)\(4\)\(i\)](#). The required review elements can be completed off-site by reviewing documents, electronic systems, or by using other means of technology. Sponsoring organizations should review and verify records that have been texted, emailed, mailed, faxed, or delivered to the sponsoring organization, or through virtual observation, for example, by using recorded video. In situations where direct observation normally occurs, sponsoring organizations should review and verify records by observing photos and/or recorded videos. Sponsoring organizations may also conduct interviews with facility staff and Program participants to verify information in photos via phone or video conference. Unannounced reviews can be completed during an unscheduled phone or video call. Strategies for reviewing elements off-site include, but are not limited to:

- ✓ **Recordkeeping** – evaluate that facilities maintain required documentation and records.
- ✓ **Enrollment Records** – verify that enrollment records include documentation of the enrollment of each participant at child care centers (except for outside-school-hours care centers, emergency shelters, and at-risk afterschool care centers) and family day care homes are updated annually, signed by a parent or legal guardian, and include

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information on each child's normal days and hours of care and the meals normally received while in care.

- ✓ **Attendance Records** – verify that required daily records include the number of participants in attendance and the daily meal counts, by meal type, served to family day care home participants, or the time-of-service meal counts, by meal type, served to center participants. Ensure that daily, dated attendance of participants is documented separately from meal counts.
- ✓ **Income Eligibility Forms** – for centers, verify that income eligibility forms are available for all enrolled participants that are listed as receiving free or reduced-price meals. For family day care homes, verify documentation of all enrolled participants and information used to classify family day care homes as tier I or tier II family day care homes.
- ✓ **Meal Counts** (i.e., number and type of meals served) – verify that dated/time-stamped daily meal counts are taken at the point of service for centers while family day care homes may document meals at the end of the day. Use meal count records to conduct the five-day reconciliation to compare meal counts to both attendance and enrollment records.
- ✓ **Menus** – verify that daily, dated menus or meal records for each meal type are kept for all meal services.
- ✓ **Attendance at Training** – verify that all facilities and key staff were represented at trainings you conducted. Review training documentation logs, recorded training done via online platform, or view staff attendance sheet.
- ✓ **Licensing or Approval Documentation** – review a photo of the center or family day care home's license to verify it is current and posted in a public place. Ensure via photos and/or video that the center or family day care home does not have more children or adults in care than stated in the license.
- ✓ **Health, Safety, and Sanitation** – as appropriate, review photos and/or videos of: food production permit, health inspection report, food storage, food handling, and sanitation. If technology permits, conduct a live video tour of the center or facility.
- ✓ **Posters** – verify via photos and/or video that the "And Justice for All" poster is displayed in centers (not required in FDCHs) and WIC information is provided in facilities (as applicable).
- ✓ **Meal Pattern and Meal Service Observation** – verify via photos and/or video compliance with the meal pattern (photos of table/tray/plate), meal service times (time-stamped photos or photo of clock), menus (match with posted menu), and that meal counts are taken at the time of service (photos and/or video of count being taken). Make sure to document the number of meals prepared, the number of complete meals served, and if applicable, the number of nonreimbursable meals served. Photos and/or video must adequately capture all of the necessary information to adequately observe a complete meal service.
- ✓ When using technology such as video or photos, sponsoring organizations should follow any Federal and State laws related to technology use and privacy. Information that contains Personally Identifiable Information (PII), such as applications or benefit status, should be protected. Information shared by Program operators should be password protected or sent via other secure methods to ensure privacy.

In some cases it may be appropriate for the sponsoring organization to review a sample of the documentation listed above. For example, if a sponsoring organization is unable to obtain 100 percent of enrollment forms from the facility, the sponsoring organizations may choose to review a sample instead. When selecting a sample, sponsoring organizations may use a statistically valid random sample, select to review a percentage of documents, institute into their review process a minimum and maximum number of documents to review, or another process developed by the State agency. When selecting a sampling method and reviewing documents, sponsoring organizations should ensure they are still able to assess compliance with Program requirements, document the sampling method used, and be able to explain its rationale during a State agency review.

Off-site Monitoring Documentation

Sponsoring organizations should record details to thoroughly document off-site monitoring, including, but not limited to:

- The time and date the review was conducted;
- Names and contact information of center or facility staff interacted with virtually; and
- Any technical assistance the sponsoring organization provided.

If any of the required review elements cannot be fully completed within the required review time frame, sponsoring organizations may request additional waivers of statute or Program regulations to ensure compliance with oversight responsibilities. [Child Nutrition Program Waiver Request Guidance and Protocol- Revised](#) describes the waiver request process.



QUESTIONS

■ Nondiscrimination Statement

■ In accordance with Federal civil rights law and US. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

■ Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

■ To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
 - Office of the Assistant Secretary for Civil Rights
 - 1400 Independence Avenue, SW
 - Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
 - email: program.intake@usda.gov.

- This institution is an equal opportunity provider.