



Monitoring of the Child Nutrition Programs During the Novel Coronavirus Public Health Emergency Issued November 2020

Under Program statute and regulations, State agencies and local operators are required to conduct monitoring of the Child Nutrition Programs. Some components of these reviews are required to be conducted on-site. Pursuant to section 2202(a) of the Families First Coronavirus Response Act (the FFCRA) (P.L. 116-127), and in light of the exceptional circumstances of this public health emergency, the Food and Nutrition Service (FNS) extended the following nationwide waivers to help minimize potential exposure to the novel coronavirus (COVID-19):

State agencies and local operators electing to utilize these waivers must follow the requirements outlined in the applicable memorandums. FNS recognizes that during this public health emergency the option to suspend on-site monitoring is vital to support social distancing.

Unless provided flexibility through an individual waiver, State agencies and local operators must continue to monitor Program operations and may review off-site (e.g., through a desk audit). Continued technical assistance and oversight of Program operations is important to ensure that our nation's nutritional needs are met during this public health emergency. Frequency and timing of reviews is pursuant to Program statute and regulations and dependent on the Program being operated, unless the State agency has an alternative approach approved through an individual State agency waiver.

FNS understands that these are challenging times for all. Given that monitoring processes may need to be adapted and states and local operators may need to use novel off-site monitoring activities, FNS is issuing the attached documents in order to provide best practices for monitoring activities. The contents of these documents do not have the force and effect of law and are not meant to bind the public in any way. These documents are intended only to provide

clarity regarding existing requirements. State agencies and local operators that encounter challenges with monitoring during this time should work with their FNS Regional Office to address any additional steps that can be taken.

State agencies should maintain documentation that will provide FNS the necessary evidence to evaluate whether the State agency has fulfilled its State level responsibilities as outlined in 7 CFR 226.7(c), 7 CFR 210.29(c)(2), and 7 CFR 225.10(b). Local operators should maintain documentation that will provide State agencies with the necessary evidence to evaluate whether the local operator has fulfilled its oversight responsibilities. Examples of documentation may include creating and maintaining a plan of how off-site monitoring will be conducted and documentation demonstrating execution of the off-site monitoring (e.g., what documents will be collected through a desk audit, whether video or pictures of meals will be used, examples and analysis of documents reviewed etc.).

Some State and local operators have already modified their oversight processes and various best practices have been shared with FNS. Some successful strategies for conducting off-site reviews that State agencies and local operators may wish to implement are:

- Prioritizing advance planning and scheduling of desk reviews so there is sufficient time to gather all necessary review documents off-site.
- Combining desk review strategies with video call monitoring in order to view Program operations at schools and sites.
- Maintaining frequent communication with school food authorities and providers during the off-site monitoring process, given that novel questions may arise.
- Prior to the review, State agencies and local operators provide clear and concise directions and due dates, a list of required records/documents to submit electronically, and a list of photos to take in real time during the meal or snack service (photos of meal service, meals/snacks, attendance forms, menus, etc.).
- On the day of the scheduled review, connect with school food authorities, centers, and sites via a virtual meeting to observe meal services virtually and evaluate health and safety issues as applicable.
- Many local operators provide time-stamped photos of the meal service and forms.
- In areas where video chats and internet bandwidth are less accessible, State agencies and local operators develop desk audit procedures using phone calls and document submission.
- Conducting training and technical assistance via online face-to-face meeting software.

As a reminder, when conducting reviews this year, State agencies and local operators should be aware of the various nationwide waivers available for use in the Child Nutrition Programs.

FNS appreciates the exceptional efforts of State agencies and local Program operators working to meet the nutritional needs of child and adult participants during this challenging time. State

agencies should direct questions to the appropriate FNS Regional Office. Local Program operators should direct questions to the appropriate State agency.