



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

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### **Purpose**

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). This memorandum also impacts review requirements regarding the SFSP and provides guidance to State agencies and local operators implementing the Program.

### **Legal Authority**

SFSP 06-2023

### **Background**

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.

### **Program Requirements**

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.

## Comments

For questions concerning this memorandum, please contact Policy Administrator at (404) 651-8193.

### Appendix

#### On-site/Off-site Monitoring Guidance

#### Summer Food Service Program

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**

<b>Review Element and Regulations</b>	<b>Procedures to be Conducted On-site</b>	<b>Procedures with Option to be Conducted Off-site</b>
<b>Food Service Management Company Registration</b> (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.
<b>Monitoring of food service management company procurements</b> (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.
<b>Meal Ordering</b> (7 CFR 225.6(l)(2)(iv))		Evaluate invoices, delivery receipts, and meal counts as part of a desk audit.
<b>Pre-approval Visits</b> (7 CFR 225.7(d))	Pre-approval visits must be conducted on-site.	
<b>Review of Sponsor and Site Reviews</b> (7 CFR 225.7(e))	Reviews must be conducted on-site.	
<b>Meal Claim Validation</b> (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.
<b>Follow up Reviews</b> (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.
<b>Records</b> (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.).
<b>Meal Preparation Facility Reviews</b> (7 CFR 225.7(i))	Visits conducted to inspect facilities are to occur on-site.	
<b>Corrective Action</b> (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.
<b>Other Facility Inspections and Meal Quality Tests</b>	Visits conducted to inspect facilities are to occur on-site.	

<b>(7 CFR 225.7(l))</b>		
<b>Financial Management (7 CFR 225.7(m))</b>		Request and obtain documentation of the net cash resources of the nonprofit food service account. Evaluate these records as part of a desk audit.
<b>Training and Monitoring (7 CFR 225.7(j))</b>	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.
<b>Sponsor Site Visit (7 CFR 225.7(o))</b>		Request and obtain documentation of site visits and review forms for sites that had operational problems in the year prior.
<b>Notification to the Community (7 CFR 225.15(e))</b>		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
<b>Meal Ordering</b> (7 CFR 225.15(b))		Request records of participation from sites, review approved levels of meal service, and keep records of meal ordering adjustments.
<b>Records and claims</b> (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.).
<b>Food Service Operations</b> (7 CFR 225.15(d)(3))	Visits conducted to verify food service operations are to occur on-site.	
<b>Meal Service</b> (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.	
<b>Training and monitoring</b> (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.
<b>Training and monitoring</b> (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.	
<b>Food Service Management Companies</b> (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.
<b>Meal Preparation</b> (7 CFR 225.16(a))	Visits conducted to verify meal preparations operations are to occur on-site.	
<b>Meal Pattern Requirements</b> (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><b>Civil Rights Compliance – FNS INSTRUCTION 113-1 Civil Rights Compliance and Enforcement – Nutrition Programs and Activities</b></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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