

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

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.

- ✓ **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.