



# FY2021 SFSP SPONSOR MONITORING GUIDANCE DURING COVID-19

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### REGULATORY BACKGROUND

- 1) The Nationwide Waiver to Waive First Week Site visits in Summer Food Service Program-Extension 2 (COVID-19, Child Nutrition Response #81)**, dated March 9, 2021, specifically waives the first week site visit during the first week of operation for sponsors, if the site operated successfully in the previous year and if the sponsor successfully participates in the CACFP or the NSLP through **September 30, 2021** to SFSP Sponsors who have requested this waiver and received approval from DECAL.

Nutrition Services implemented a new process for Child Nutrition Program (CNP) operators to request COVID-19 related USDA nationwide waivers. Beginning March 15, 2021, any new requests for waivers must be completed through an online Waiver Participation Form in the new USDA Waivers Module in GA ATLAS. Operators will still be required to complete the applicable [Waiver Request Form](#); however, these forms must now be uploaded to the USDA Waivers Module as part of the new process. NOTE: If you have already submitted and have been approved to utilize a waiver, you do not have to submit the request again.

For general questions about the waiver, please contact Tammie Baldwin at [Tammie.Baldwin@dec.al.ga.gov](mailto:Tammie.Baldwin@dec.al.ga.gov) or 404-656-6332. You may also contact your assigned Technical Assistance Coordinator or the Nutrition TA Mailbox at [NutritionTA@dec.al.ga.gov](mailto:NutritionTA@dec.al.ga.gov).

- 2) The Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program-Extension 2 (COVID-19, Child Nutrition Response #42)**, dated August 4, 2020, specifically allows for off-site monitoring via desk review/audit through **September 30, 2021** to SFSP Sponsors who have requested this waiver and received approval from DECAL.

To ensure Program integrity during this time, sponsoring organizations should, to the maximum extent practicable, continue monitoring activities of Program operations offsite (e.g., through a desk audit). This waiver allows for offsite monitoring and is effective immediately, and remains in effect through September 30, 2021.

**To utilize this waiver, please complete the Combined Waiver Request Form and select the “SFSP Monitoring Requirements” waiver option. Please send your request to [Leslie.Truman@dec.al.ga.gov](mailto:Leslie.Truman@dec.al.ga.gov).**

- 3) The Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through School Year 2020-2021-Extension (COVID-19, Child Nutrition Response #59)**, dated

October 9, 2020, allows for Summer Food Service operations to continue in FY2021 until **June 30, 2021**.

## **SPONSOR MONITORING GUIDANCE**

This guidance has been developed to ensure the health and safety of sponsored staff and sites can be maintained and to assist our SFSP sponsors in developing an alternate virtual monitoring process (desk review/audit) to ensure sponsors are in compliance with monitoring requirements per USDA regulations during this public health emergency.

- The sponsoring organization may submit a waiver to waive the first week site visit if any site operated successfully in the previous year and if the sponsor successfully participates in CACFP or NSLP, the sponsor may request a waiver as outlined in #1 above.
- The sponsoring organization may also submit a second waiver for offsite monitoring, which can be utilized for all monitoring visits during FY2021 as outlined in #2 above.
- Sponsoring Organization should review all elements of program operations found at 7 CFR 225.15 that they would normally review while on-site to the best of their ability.
- In situations where direct observation normally occurs, sponsors should review and verify records by observing photos and/or live or recorded videos. Sponsors may also conduct interviews with facility staff and program participants to verify information in photos via phone or video conference.

*In November 2020, USDA issued additional monitoring guidance, **Monitoring of the Child Nutrition Programs During the Novel Coronavirus Public Health Emergency and Sponsor Monitoring of the Summer Food Service Program Federal Fiscal Year 2021 Off-site Monitoring During the COVID-19 Public Health.** (This information can be found on our DECAL website under COVID-19 Resources).*

## **SPONSOR ON-GOING SITE MONITORING IN FY2021**

Also, due to the continuation of the Summer Food Service Program operations in FY2021, guidance has been developed to ensure sponsors are in compliance with SFSP monitoring requirements per 7 CFR 225.15 (d)(2)(3) and to provide additional guidance regarding on-going site monitoring after the 1<sup>st</sup> and 4<sup>th</sup> week visit/review.

- During FY2021, Sponsors are still required to conduct a first week visit (unless the sponsor has an approved waiver) during the first week of operations and a site review within the first four weeks of operations, in accordance with 7 CFR 225.15(d) (2)(3), *Sponsors shall visit each of their sites at least once during the first week of operation under the Program and shall promptly take such actions as are necessary to correct any deficiencies. Sponsors shall review food service operations at each site at least once during the first four weeks of Program operations, and thereafter shall maintain a reasonable level of site monitoring. Sponsors shall complete a monitoring form developed by the State agency during the conduct of these reviews.*

**Effective January 4, 2021**, DECAL recommends that, in addition to the 1<sup>st</sup> and 4<sup>th</sup> week visit/review, all sponsoring organizations conduct on-going quarterly monitoring reviews for all sites in operation in FY2021. The Sponsor must complete the site review form for all monitoring reviews. The additional monitoring recommendations will apply based on approval of operational dates and the current quarter the sponsor is approved in. Once approved, the sponsor would be required to conduct the 1<sup>st</sup> and 4<sup>th</sup> week site visit/review in accordance with CFR 225.15(d)(2)(3), however, the sponsor would not be expected to conduct an additional monitoring review in the same quarter they are approved to operate. The additional on-going monitoring reviews should start in the next quarter. Please refer to the example and chart below.

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*E.g. The sponsoring organization was approved to operate on January 1, 2021. The sponsor would be required to conduct the 1<sup>st</sup> week (unless approved waiver) and the 4<sup>th</sup> week review within the first four weeks of operation for all sites. The recommendation to conduct additional site reviews would not be required until the next quarter, April 2021-June 2021. Then, if the sponsor is still operating into the next quarter, July 2021-September 2021, DECAL recommends the sponsor to conduct another site review for all sites still operating.*

<b>Monitoring Requirements and Recommendations</b>	
<b>1<sup>st</sup> Week Visit (Form att. L-2):</b>	All sites within first week of operations (unless 1 <sup>st</sup> Week Waiver approved)
<b>4<sup>th</sup> Week Site Review (Form att. L-3):</b>	All sites within first four weeks of operations
<b>One Additional Monitoring review for all sites per quarter of operation (Form att. L-3):</b>	January 2021-March 2021
	April 2021-June 2021
	July 2021-September 2021

## PRE-PLANNING VIRTUAL MONITORING VISITS

- The off-site monitoring waiver does not omit the sponsor from conducting all required monitoring visits in FY2021. The sponsor is responsible for ensuring that virtual/desk reviews are conducted on all sites under the sponsoring organization if on-site monitoring will not be conducted.
- The sponsor should pre-plan and prepare prior to conducting the virtual monitoring visit(s).
  1. First, make sure your sponsoring organization has the required monitoring waiver approvals.
  2. Does your sponsoring organization have an on-site monitoring waiver?
    - a. If **Yes**, then it would be acceptable to conduct a virtual monitoring visit (desk review/audit) on any site under the sponsors organization.
    - b. If **No**, the sponsor would be expected to conduct an on-site monitoring visit.

## VIRTUAL MONITORING VISITS

- The virtual monitoring visit(s) includes the following:
  1. Desk Review/Audit
    - a. The sponsor can review the required elements off-site by reviewing documents, electronic systems, or by using other means of technology.
    - b. The sponsor should develop a *Record Request Checklist* based on the Site Monitoring form questions that must be assessed or DECAL has developed a Record Request Checklist template that you may use, that can be found [here](#).
    - c. Develop an email template to notify sites of the desk review and request for any records needed to conduct the review.
      - ❖ It is acceptable to contact the site by phone first and let them know what to expect.
      - ❖ It is acceptable to allow 5 business days for the site to submit the records electronically.

- ❖ 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.
- d. The sponsor can use the date the records were received or the date the monitor completed the desk review as the *date of review*.
- e. The sponsor should complete the monitoring form in its entirety and also indicate the following.
  - a. Indicate on the monitoring form if the review was conducted as a desk review.
  - b. Name and contact information of site staff interacted with virtually.
  - c. Indicate how they observed and completed the meal observation.

## 2. Virtual Meal Observation

- a. Develop a plan to conduct the virtual meal observation.
  - ❖ The Sponsor can observe the meal service in one of the following ways:
    - Request and obtain pictures of the meal prep and meal service
    - Request and obtain a recorded video of the meal prep and meal service
    - Schedule a virtual meeting (video conference) with the facility and observe the meal prep and service over Zoom, Skype, GoToMeeting, or any other video platform.
  - ❖ The Sponsor must access/obtain the following to ensure all of the information captures all necessary information to adequately observe a complete food service operation.
    - Compliance with Meal Pattern/Meal Prep-verify via photos and/or video compliance with photos of table/tray/plate.
    - Compliance with Meal Delivery- verify via photos and/or video compliance with photos delivery receipt and items delivered.
    - Compliance with Holding Facilities- verify via photos and/or video.
    - Compliance with Temperature of Food-verify via photos and/or video of the temperature being taken.
    - Point of Service Meal Counts-verify via photos and/or video of count being taken.
  - ❖ The sponsor should first advise the site to make every effort to not capture any images of a child during the meal observation. If the sponsor or site cannot provide visuals without capturing an image with a child, then the sponsoring organization and site must take steps to safe guard the video or photo to ensure it's not released to anyone other than DECAL without the consent of the child's parent.
  - ❖ The requested photos can be from any meal service (breakfast, lunch, supper, or snack).
  - ❖ It is up to the sponsor to determine which date and meal service will be observed/requested.
  - ❖ The sponsor should indicate on the Site Review form, the date and type of meal service observed.

## 3. Virtual Exit Conference

- a. The sponsor should review the *Summary of Findings* (if any) with the site and request a signature and date on the Site Review form.

- ❖ It is acceptable for the sponsor to schedule a phone conference or virtual meeting (video conference) with the site over Zoom, Skype, GoToMeeting, or any other video platform.

## **RECORD KEEPING**

1. The sponsor should be able to complete the entire monitor assessment based on the review of records (desk review) and virtual meal observation.
2. The sponsor should be able to complete the entire monitor assessment based on the review of records (desk review) and virtual meal observation.
3. The sponsor should attach the following records to the Site Review form.
  - ✓ 5-day meal counts
  - ✓ Pictures from the meal observation, if applicable

## **ADDITIONAL COVID-19 RESOURCES AND WAIVERS**

- [Click here](#) for **COVID-19 Resources**
- [Click here](#) for the **DECAL Nutrition FAQs**