

State Agency 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 State agencies may forgo on-site monitoring and instead, to the maximum extent practicable, review Program operations of School Food Authorities 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 210.18** to be conducted off-site for the School Breakfast Program, the National School Lunch Program (including the Afterschool Snack Service and Seamless Summer Option), the Special Milk Program, and the Fresh Fruit and Vegetable Program. Frequency and timing of reviews is pursuant to Program statute and regulations unless the State agency has an alternative approach approved through an individual State agency oversight waiver.

Off-site Monitoring Strategies

When conducting off-site reviews, State agencies should review all elements of Program operations that would normally be reviewed while on-site. The required review elements found at **7 CFR 210.18** can be completed off-site by reviewing documents, electronic systems, or by using various means of technology. Off-site, State agencies should review and verify records that have been texted, emailed, mailed, faxed, or delivered to the State agency, or through virtual observation, for example, by using video. In situations where direct observation normally occurs, State agencies should review and verify records by observing photos and/or videos. State agencies may also conduct interviews with school food authority staff and Program participants to verify information in photos via telephone or video conference.

Below are steps that can be taken to conduct an Administrative Review of a School Food Authority by desk audit:

- ✓ Complete an Entrance Conference via telephone or video conference.
- ✓ Complete the Off-Site Assessment Tool in coordination with the school food authority.
- ✓ Complete the On-Site Assessment Tool and relevant forms, by conducting an off-site review or desk audit. See the attached addendum for helpful tips to complete this form off-site.

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.

Reminder – the below sections of the Administrative Review already includes an off-site option that can be used at State agency discretion:

- Certification and Benefit Issuance
 - Resource Management
 - Afterschool Snack Service
 - Seamless Summer Option
 - Special Milk Program
- ✓ Complete an Exit Conference via telephone or video.
- ✓ Complete the remaining review elements (i.e., issuing the Administrative Review Report) using standard procedures.

When using technology such as video or photos, State agencies 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 the school food authority should be password protected or sent via other secure methods to ensure student privacy.

As a reminder, Program regulations do not require the oversight of procurement practices to be conducted on-site and State agencies may continue to conduct these reviews off-site using their planned procurement review cycle.

State agencies 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 State agency provided.

If any of the required review elements cannot be fully completed within the required review time frame, State agencies may request additional waivers of statute or Program regulations to ensure compliance with oversight responsibilities. If submitting a waiver, State agencies must use the process described in [Child Nutrition Program Waiver Request Guidance and Protocol- Revised](#), and are strongly encouraged to use the template provided with this guidance.