

State Agency Monitoring of the School Meal Programs School Year 2020-2021¹

Off-site Monitoring During the COVID-19 Public Health Emergency Addendum- Issued November 2020

This addendum provides additional guidance to State agencies opting to conduct an Administrative Review of school food authorities off-site as allowed by [COVID-19: Child Nutrition Response #41: Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs – Revised – EXTENSION 2 through June 30, 2021](#). The State agency will complete the On-Site Assessment Tool off-site when conducting Administrative Reviews off-site.

In general, in order for State agencies to complete the On-Site assessment tool, the State agency will obtain the same documents normally reviewed when conducting reviews on-site. The information below provides additional details and tips for each section of the On-Site Assessment Tool as alternative measures may be needed in order to gain the appropriate information and documentation. The below information is *not* meant to be all encompassing and State agencies may take various steps in requesting any documents they may need to complete the relevant Administrative Review Forms and Tools.

Administrative Review 100 Series Questions – Certification and Benefit Issuance:

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review the Benefit Issuance Document from the point-of-service which includes all students in the school food authority, their benefit status, and date of certification from the day of review or any day in the review period;
 - Review all, or a statistically valid sample, of students who are certified for free and reduced price meals from the point-of-service Benefit Issuance Document for all schools in the school food authority;
 - Obtain and review certifying documentation for students in the sample (Free and Reduced Price Meal applications and direct certification list); and
 - Follow standard procedures for reviewing certification and Benefit Issuance Documents to ensure compliance with regulations.

Administrative Review 200 Series Questions – Verification

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review the most recent FNS-742;
 - Obtain and review all verified applications from the school food authority for the school year under review (see Administrative Review manual for timeframes);
 - Select a sample of verified applications to review in accordance with procedures outlined in the Administrative Review manual; and
 - Follow standard procedures for assessing compliance with verification requirements.

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.

Administrative Review 300 Series Questions – Counting and Claiming

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Establish a “day of review” for assessing compliance.
 - Obtain and review information, which is normally gathered on-site, using conference call or video conferencing. This may include:
 - Interviewing staff regarding standard operating procedures;
 - Interviewing Program participants regarding meal service;
 - Assessing meal service and compliance;
 - Obtaining photos of meals and point-of-service system;
 - Obtaining production records from the day of review;
 - Obtaining all meal counts from the point-of-service from the day of review;
 - Obtaining edit checks for the day of review; and
 - Reviewing claims for reimbursement from the month in which the day of review is selected.

Administrative Review 400 Series Questions – Meal components and Quantities

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Establish a “day of review” for assessing compliance.
 - Obtain and review information that is normally gathered on-site, this may include the following:
 - Weekly certification worksheet, nutrient analysis, and planned menu for week of review;
 - Production records from the day of review;
 - All labels and standardized recipes from the day of review;
 - Photos that may help establish the portion sizes used (e.g. serving utensils used, packing containers, case counts for fruits/vegs);
 - Receipts/invoices if applicable;
 - All meal modifications for disabilities and back-up documentation, as applicable;
 - Use of video conferencing to assess meal service and compliance;
 - Photos of meals and meal service lines; and
 - Photos of signage or other methods that show how to select a reimbursable meal.

Administrative Review 500 Series Questions – Offer vs Serve

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Interview staff to make sure training has been conducted and staff understand how to identify a reimbursable meal.
 - Obtain and review photos of any signage or other methods that show how to select a reimbursable meal, the 5 components being offered and/or a student’s tray showing a minimum of 3 reimbursable components and the correct quantities selected.

[Please note COVID 19- Child Nutrition Response #37 Nationwide Waiver to Allow Offer vs Serve Flexibility for Senior High Schools in the NSLP for SY 2020-2021](#)

Administrative Review 600 Series Questions – Dietary Specifications and Nutrient Analysis

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Complete the Dietary Specifications Assessment Tool using documentation provided by the school food authority to validate the answers given on the off-site portion. For example, the school food authority may submit photos of the kitchen to validate that a fryer is not on-site.
 - If the Dietary Specifications Assessment Tool triggers a nutrient analysis obtain and review an electronic copy of the nutrient analysis and complete the Nutrient Analysis and Validation Checklist following standard procedures outlined in the Administrative Review manual.

Administrative Review 700 Series Questions – Resource Management

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Complete the Risk Indicator Tool in coordination with the school food authority.
 - If the Risk Indicator Tool triggers a comprehensive review in any area, obtain documentation to complete the Resource Management Comprehensive Review Form off-site. Documentation may include invoices, allowable costs records, Statements of Revenues and Expenses, balance sheets, and/or State agency or Food and Nutrition Service developed tools (e.g., Paid Lunch Equity Tool).

Administrative Review 800 Series Questions - Civil Rights

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review a photo of the approved “And Justice for All” poster as displayed in the school.
 - Ensure Civil Rights are protected as part of the Certification and Benefit Issuance review and meal service observation.

Administrative Review 900 series – School Food Authority On-site Monitoring

- ✓ When completing the On-Site Assessment Tool, the State agency will collect documentation regarding the school food authorities’ process for on-site monitoring, which may take place off-site, and the completion of the monitoring by February 1.
- ✓ State agency may want to interview staff to obtain information on this process and its completion.

Pursuant to [COVID-19: Child Nutrition Response #41: Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs – Revised – EXTENSION 2 through June 30, 2021](#) school food authority **on-site** monitoring is waived.

Administrative Review 1100 Series Questions – Smart Snacks in School

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review product labels and nutrition documentation for items sold a la carte on the day of review.
 - Obtain photos of where products are sold during the day, such as vending or school stores.
 - Obtain and review menus and production records for the week of review to ensure that leftover entrees are only sold the same day or the day after they are initially offered.

Administrative Review 1200 Series Questions – Professional Standards

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review the list of employees with food service duties as of the day of review
 - Obtain and review the most up-to-date professional standards tracking log
 - Obtain and review a copy of any certifications, trainings, etc. as applicable

Administrative Review 1300 Series Questions – Water

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review a picture of water availability in places where meals are being served.

Administrative Review 1400 Series Questions - Food Safety, Storage and Buy American

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review the school food authority’s written food safety program based on either the traditional or process approach to HACCP principles.

- Obtain and review all supporting documentation electronically to make sure it contains all required elements. Examples include:
 - Food safety plan
 - Food safety inspections and temperature logs.
 - A photo of how food is being stored at the school and/or off-site storage facility.
 - Procurement purchasing orders and exceptions.
- Obtain and review photos of packaging from a variety of foods by each food component category to assess if the food is produced domestically, and if food products are processed in the United States using over 51% domestic foods.

Administrative Review 1500 Series Questions – Reporting and Recordkeeping

- ✓ When completing the On-Site Assessment Tool, the State agency will:
 - Obtain and review evidence of recordkeeping in any way possible (e.g. e-mails, electronic copies, photos of physical copies if that is all that is available).

Administrative Review 1700 Series Questions– The National School Lunch Program Afterschool Snack Service

- ✓ Conduct the review off-site using the *Supplemental Afterschool Snacks Administrative Review Form*. Obtain electronic supporting documentation.

Administrative Review 1800 Series Questions – Seamless Summer Option

- ✓ Conduct the review off-site using the *Supplemental Seamless Summer Option Administrative Review Form*. Obtain electronic supporting documentation.

Administrative Review 1900 Series Questions – Fresh Fruit and Vegetable Program

- ✓ When completing the On-Site Assessment Tool and relevant forms the State agency will:
 - Obtain and review documentation on:
 - How widely the school food authority publicizes the Program;
 - Availability to all enrolled children free of charge;
 - Cost documentation to support school claim; and
 - What fruits or vegetables were served on a daily basis and including photos of service from the day of review

Administrative Review 2000 Series Questions – Special Milk Program

- ✓ Conduct the *Supplemental Special Milk Program Administrative Review Form* off-site. Obtain electronic supporting documentation. Typically, an on-site review is required, if the State agency has identified documentation problems or if the State agency has identified meal counting or claiming errors in the review of the National School Lunch Program or School Breakfast Program. Given that the Food and Nutrition Service has currently waived on-site reviews, there is no requirement for an on-site review. Since an on-site review may not occur, the State agency may follow up with additional technical assistance and corrective action if the State agency has identified documentation problems or if the State agency has identified meal counting or claiming errors in the review of the National School Lunch Program or School Breakfast Program.