

Sponsor Monitoring of the Summer Food Service 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, to the maximum extent practicable, review Program operations, off-site (e.g., through a desk audit). [COVID-19: Child Nutrition Response #42: Nationwide Waiver of Onsite Monitoring Requirements for Sponsors in the Summer Food Service Program](#), in effect until September 30, 2021, allows sponsoring organizations to conduct monitoring requirements in the Summer Food Service Program (SFSP) off-site. Frequency and timing of SFSP sponsor reviews is pursuant to Program regulations unless their State agency has an alternative approach approved through an individual State agency oversight waiver.

Off-site Monitoring Strategies

When conducting off-site reviews, sponsor organizations should review all elements of Program operations that they would normally review while on-site to the best of their ability. This includes review elements as required by **7 CFR 225.15**. This includes all the review elements outlined in the monitoring review forms developed by the sponsoring organization's State agency these elements can be completed by using other means of technology. Off-site monitoring through a desk review can be conducted by reviewing records that have been emailed, mailed, faxed, or delivered to the sponsoring organization. For example, monitors may evaluate Program documentation related to monitoring, food delivery tickets, food safety, sanitation, health inspections, meal count sheets, and civil rights via desk review.

In situations where direct observation normally occurs, such as observation of meal delivery or preparation, meal pattern components, point of service meal counting, verification of attendance, and health and safety issues, alternative observation can be conducted virtually by using video and/or photos of meal preparation and meal service. Sponsoring organizations may also conduct interviews with site supervisors and Program participants to verify information in photos via telephone or video conference. Below are examples of documentation which can be reviewed through off-site means. The below list is not all encompassing and reviewers should, to the best of their ability, complete review components outlined in their State agency developed review forms.

- ✓ **Meal count records** (review meal counts for more than one day to ensure daily meal counts are being recorded) - Review scanned copy, picture, or video.

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.

- ✓ **Menus and other food service records;** such as production records if used, to ensure meal pattern compliance - Review scanned copy, picture, or video.
- ✓ **Meal delivery receipts** - Review scanned copy, picture, or video.
- ✓ **Health and safety inspections**’- Review scanned copy, picture, or video.
- ✓ **“And Justice for All” Poster** – verify via photos and/or video that the “And Justice for All” poster is displayed in institutions.
- ✓ **Income Eligibility Forms, if applicable** – for camps, National Youth Sports Program and closed enrolled sites, verify that income eligibility forms are available for all enrolled participants that are listed as receiving free or reduced-price meals.

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.

Off-site Monitoring Documentation

Sponsoring organizations should continue to 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 site staff that participated virtually; and
- Any technical assistance provided.

If any of the required review elements cannot be fully completed within the required review timeframe, sponsors 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.