# Topic: On-Site Monitoring

**Overview:**

School Food Authorities (SFA) that participate in NSLP/SBP and operate more than one site are annually required to conduct on-site monitoring of the meal counting and claiming system. The purpose of this review is to evaluate meal counting and claiming procedures and ensure internal controls have been established to support accurate lunch counts prior to submitting the claim for reimbursement. Additionally, SFAs participating in the After School Snack Program (ASSP) are required to conduct on-site monitoring to assess each site’s compliance with counting and claiming procedures and meal pattern.

## **Requirements for NSLP and SBP monitoring:**

* On-site monitoring must be completed annually by February 1.
	+ All sites operating NSLP must be reviewed.
	+ 50% of sites operating SBP must be reviewed and each site must be reviewed minimally every two years.
* Use the [SNP On-Site Monitoring Form](https://www.oregon.gov/ode/students-and-family/childnutrition/SNP/Documents/3731h-P%20%28On%20Site%20Monitoring%20NSLP%29.docx) to complete the review.
* Any areas of noncompliance identified during monitoring must be addressed and a corrective action plan prepared and implemented.
* Follow-up monitoring must be conducted within 45 days of the first visit to ensure the corrective action resolved the problem.
* LEAs with only one school are not required to conduct on-site monitoring but are encouraged to conduct a self-assessment.
* LEAs with Food Service Management Company contracts are required to have school personnel conduct the on-site monitoring.
* Retain completed on-site monitoring forms and documentation of any corrective action for three years plus the current school year.

## **Requirements for ASSP monitoring:**

* Must be conducted at least two times per year.
* The first monitoring must occur during the first four weeks that the site is in operation.
* Use the [ASSP On-Site Monitoring Form](https://www.oregon.gov/ode/students-and-family/childnutrition/SNP/Documents/Afterschool%20Snack%20-%20Site%20Monitoring%20Form.docx.doc) to complete the review.
* Any areas of noncompliance identified during monitoring must be addressed and a corrective action plan prepared and implemented.
* Retain completed on-site monitoring forms and documentation of any corrective action for three years plus the current school year.

**Note:** Food Service Management Companies (FSMC) staff may not be responsible for the annual monitoring requirement however they may work alongside SFA staff to provide technical assistance on program requirements. SFA staff must observe the meal service and complete the monitoring forms.

**Other Information:**

The on-site monitoring areas of evaluation include:

* Rosters/eligibility determination accuracy
* Meal counting system
* Meal count consolidation
* Overt identification
* Written procedures
* Readily observable general areas

**Helpful Resources:**

* [SNP On-Site Monitoring Form](https://www.oregon.gov/ode/students-and-family/childnutrition/SNP/Documents/3731h-P%20%28On%20Site%20Monitoring%20NSLP%29.docx)
* [ASSP On-Site Monitoring Form](https://www.oregon.gov/ode/students-and-family/childnutrition/SNP/Documents/Afterschool%20Snack%20-%20Site%20Monitoring%20Form.docx.doc)

**Regulatory Reference:**

* [7 CFR 210.8](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#210.8)
* [7 CFR 220.11](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-220/section-220.11)
* [SP 56-2016](https://www.fns.usda.gov/cn/administrative-reviews-final-rule)
* [7 CFR 210.9(c)(7)](https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#p-210.9(c)(6))

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**Acronym Reference** **and Definitions**

-CFR Code of Federal Regulation

-LEA Local Education Agency

-NSLP National School Lunch Program

-ODE CNP Oregon Department Education Child Nutrition Program

-SBP School Breakfast Program

-SFA School Food Authority

# The Washington Office of Superintendent of Public Instruction created this document. The Oregon Department of Education modified the document to apply to Oregon.