



Food and Nutrition Service
Braddock Metro Center
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DATE: April 6, 2023

MEMO CODE: CACFP 07-2023

SUBJECT: Oversight and Monitoring of the Child and Adult Care Food Program - Guidance on On-site and Off-site Strategies and Options

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Issuing Agency/Office:	FNS/Child Nutrition Programs
Title of Document:	Oversight and Monitoring of the Child and Adult Care Food Program - Guidance on On-site and Off-site Strategies and Options
Document ID:	
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Date of Issuance:	April 6, 2023
Replaces:	
Summary:	1) The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Child and Adult Care Food Program. 2) This memorandum impacts review requirements regarding the Child and Adult Care Food Program and provides guidance to State agencies and local operators implementing the Program.

The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Child and Adult Care Food Program (CACFP).

One of the primary responsibilities of the Food and Nutrition Services (FNS) is the oversight and management of the 16 Federal nutrition assistance programs. Program monitoring is essential for ensuring that the Federally funded Child Nutrition Programs meet the requirements set forth in regulations, are operated with integrity, and provide nutritious meals and snacks to those who participate in the programs.

With the announcement of the start of the COVID-19 Public Health Emergency (PHE) on March 13, 2020, on-site monitoring of the Child Nutrition Programs became challenging and difficult to conduct as the number of COVID-19 cases increased and social distancing measures were enacted. FNS issued nationwide waivers for on-site monitoring requirements, allowing State agencies and sponsors to monitor Program operations off-site. Off-site monitoring helped ensure Program integrity while protecting the health and safety of staff and participants.

As outlined in SP 03-2023, CACFP 02-2023, [Offsite Monitoring of the CACFP and School Meal Programs After the Public Health Emergency Ends](#), the Department of Health and Human

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Services recently announced that May 11, 2023, is the planned end date for the COVID-19 PHE. Given this expiration date, the FNS-issued nationwide on-site monitoring waivers are set to expire on June 10, 2023, 30 days after the end of the PHE. In addition to these nationwide waivers, FNS issued individual off-site monitoring waivers for States that requested them. While not impacted by the end of the PHE, these waivers are scheduled to expire on June 30, 2023.

FNS understands that State agencies quickly adapted review and monitoring procedures to include off-site strategies in response to the COVID-19 PHE and are interested in continuing to adapt some review procedures. The intent of this memorandum is to provide guidance to State agencies regarding on-site monitoring and when it is required by regulations, when States have discretion to conduct monitoring off-site, and what monitoring procedures are recommended when States have discretion to conduct monitoring on or offsite. In addition, with State agency approval, local operators may utilize the guidance in this memorandum. FNS recognizes that there is not a universal approach to monitoring. Although this memorandum outlines areas of discretion in general, State agencies also have some discretion when considering the oversight needs of individual Program operators when determining what review elements could be examined on-site versus off-site. Some operators may benefit from most review activities conducted on-site, and for others, on-site time may be better utilized on technical assistance.

Accompanying this memorandum is an appendix that outlines the review requirements and the on-site and off-site strategies and options applicable to the CACFP.

State agencies are reminded to distribute this memorandum to Program operators immediately. Program operators should direct any questions concerning this guidance to their respective State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Sincerely,

Original Signed

Jessica Saracino
Director
Program Monitoring and Operational Support Division
Child Nutrition Programs

Appendix
On-site/Off-site Monitoring Guidance
Child and Adult Food Care Program (CACFP)

In response to State agencies and sponsoring organizations implementing innovative solutions to conduct off-site reviews and provide oversight of the CACFP throughout the public health emergency, FNS has developed the following guidance for conducting off-site monitoring. The review must take place at the institution or facility's location, though portions may be conducted at the State or sponsoring organization's office, informally known as the 'desk review' or 'desk audit' portion. There may be a combination of reviews conducted to complete the Program review. For instance, the State agency monitor may evaluate the institution's single audit, budget, and training attendance via desk review and conduct the balance of the evaluation of the institution's Program on-site.

Tips and Best Practices:

1. Plan ahead and communicate.
2. Develop a standard process.
3. Consider feasibility of a hybrid approach.
 - a. Obtain documents through a secure platform to ensure personally identifiable information is secure.
 - b. Conduct the exit interview can be conducted via video conferencing as an off-site approach.
4. Develop checklists and tools to ensure operators are aware of on-site and off-site review requirements and documentation submission procedures.
 - a. Request additional information as needed to resolve issues found in the off-site portion.
5. Document any off-site elements of the review and interviews.
6. Practice using a file sharing platform among staff before conducting a review.
7. Evaluate your established review standard procedures and make modifications to reflect latest learned strategies.

CACFP State Agency Review Requirements

Requirement	Procedures to be Conducted On-site	Procedures with Option to be Conducted Off-site
Recordkeeping (7 CFR 226.6(m)(3)(i))		Request a sample of records to cover the scope of the last three years plus the current year (dated invoices, training, mileage log, etc.).
Meal counts (7 CFR 226.6(m)(3)(ii))	Visits conducted to verify meal counts (accuracy/up to date) are to occur on-site.	
Administrative costs (7 CFR 226.6(m)(3)(iii))		Request and obtain the approved budget and/or amendments, dated invoices and receipts, additional financial records, as needed.
Applicable instructions and handbooks issued by FNS (7 CFR 226.6(m)(3)(iv))	The reviewer can be on-site to observe that all applicable instructions and handbooks have been implemented.	To meet the intent of this requirement, the reviewer can evaluate documentation that demonstrates that all applicable instructions and handbooks have been implemented.
Facility licensing and approval (7 CFR 226.6(m)(3)(v))	The reviewer must be on-site to observe the number of children and their ages. License must be displayed, as directed by the State agency.	Request and obtain a photo or video of the posted license.).
Compliance with the requirements for annual updating of enrollment forms (7 CFR 226.6(m)(3)(vi))		Request and obtain the enrollment forms for each enrolled participant. Be sure to use a secure file sharing platform to protect personally identifiable information.
If an independent center, observation of a meal service (7 CFR 226.6(m)(3)(vii))	Meal service observations are to occur on-site.	
If a sponsoring organization, training and monitoring of facilities		Request and obtain copies of dated training materials and agendas and attendee sign in

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(7 CFR 226.6(m)(3)(viii))		sheets. If training is conducted virtually, obtain dated confirmation. Request and obtain copies of monitoring forms, schedules, and tracking log.
If a sponsoring organization of day care homes, implementation of the serious deficiency and termination procedures (7 CFR 226.6(m)(3)(ix))		Request and obtain records related to serious deficiency declarations, terminations, and appeals for daycare home providers.
If a sponsoring organization, implementation of the household contact system (7 CFR 226.6(m)(3)(x))		Request and obtain records related to the implementation of household contacts (written policies and procedures, records of contacts, etc.).
If a sponsoring organization of day care homes, the requirements for classification of tier I and tier II day care homes (7 CFR 226.6(m)(3)(xi))		Request and obtain records (census data, school data, provider income, etc.) used to classify daycare homes as tier I and tier II.
All other Program requirements (7 CFR 226.6(m)(3)(xii))	Visits conducted to verify Civil Rights compliance are to occur on-site ensuring compliance requirements are routinely implemented and the “And Justice for All” poster is displayed.	

CACFP Sponsoring Organization Review Content

Review Element	Procedures to be Conducted On-site	Procedures with Option to be Conducted Off-site
The meal pattern (7 CFR 226.16(d)(4)(i)(A)) (7 CFR 226.16(d)(4)(i)(E))	Requirement: Validate meal items/components and quantities, complete meals, and meal signage on day of review onsite.	Request and obtain copies of menus. Evaluate menus for compliance with meal pattern requirements.
Licensing and approval (7 CFR 226.16(d)(4)(i)(B))	The reviewer must be on-site to observe the number of children and their ages. License must be displayed, as directed by the State agency.	Request and obtain a photo or video of the posted license.).
Attendance at training (7 CFR 226.16(d)(4)(i)(C))	The reviewer must ensure that the facility has CACFP-trained staff/volunteers on-site during meal service.	Request and obtain copies of dated training materials and agendas and attendee sign in sheets. If training is conducted virtually, obtain dated confirmation.
Meal counts (7 CFR 226.16(d)(4)(i)(D))	Visits conducted to verify meal counts (accuracy/up to date) are to occur on-site.	
Menu and meal records (7 CFR 226.16(d)(4)(i)(E))	The reviewer must observe that the dated menu is displayed at the facility. The reviewer must evaluate supporting documentation (dated invoices/receipts, delivery tickets, documentation of whole grain-rich, sugar in cereal/yogurt, etc.)	Request and obtain copies of dated menus and supporting documentation (dated invoices/receipts, delivery tickets, documentation of whole grain-rich, sugar in cereal/yogurt, etc.). Request and obtain a photo or video of the displayed dated menu.
Annual updating and content of enrollment forms (7 CFR 226.16(d)(4)(i)(F))		Request and obtain the enrollment forms for each enrolled participant. Be sure to use a secure file sharing platform to protect personally identifiable information.
Five-day reconciliation of meal counts (7 CFR 226.16(d)(4)(ii))	On the day of review (on-site meal service observation) the reviewer must obtain and	

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	evaluate the daily attendance and meal counts for a five-day period prior to the day of review.	
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