

## Off-Site Monitoring Guidance for Program Year 2021: Child and Adult Care Food Program

During the current public health emergency sponsoring organizations may forgo on-site monitoring visits and instead review Program operations off-site (i.e., through a desk audit). [COVID-19: Child Nutrition response #39: Nationwide Waiver of Onsite Monitoring Requirements for Sponsors in the Child and Adult Food Care Program](#), in effect until September 30, 2021, allows sponsoring organizations to complete Child and Adult Care Food Program (CACFP) monitoring requirements off-site.

Several monitoring requirements have been waived for sponsoring organizations in Minnesota. The waiver of these requirements is effective for the 2021 program year through September 30, 2021.

Waived Monitoring Requirement:	What this means:
At least two of the three required monitoring visits must be unannounced.	All monitoring visits can be completed as announced visits.
At least one unannounced visit must include a meal observation.	A meal observation is not required, but is still recommended via virtual observation, if possible.
Not more than six months may elapse between visits.	It is okay if more than six month elapse between monitoring visits.

### Ready: Plan for Off-Site Monitoring

Off-site monitoring consists of a desk audit of a center's records conducted from the sponsor office or other work location. During off-site monitoring, monitoring staff also communicate with center staff by phone, email, or a virtual meeting to discuss Program operations in order to complete the monitoring form.

Remember, on-site visits may still be conducted as long as they can be done safely.

### Set: Prepare for Off-Site Monitoring Visits

Successful off-site monitoring requires two-way communication and an understanding of each site's technological capabilities. Below are general steps to take to help you prepare for the off-site monitoring visits:

1. Communicate with the site director that offsite monitoring is now in place and sites will be expected to complete corrective action if any findings are identified.
2. Determine the best method to obtain documentation for each site (consider each site director's access to and comfort with the various methods of sharing review documentation).
3. Schedule a due date for requested review documentation/records.

#### Quick Tip: Methods to Obtain Review Documentation

- Text
- Scan and email
- Fax
- Mail
- Deliver copies of records to the sponsor
- Upload records into File Sharing system (e.g., Google Drive, Dropbox, etc.)
- Virtual observation (e.g., Zoom, FaceTime, Google Duo, Skype, Microsoft Teams, Facebook Messenger, WhatsApp, photos, recorded video)

## Required Documentation

When conducting off-site monitoring visits, sponsoring organizations must review all elements of Program operations that they would normally review while on-site to the best of their ability. This includes all of the review elements found at 7 CFR 226.16(d)(4)(i).

Provide a list of required documentation to be evaluated during the monitoring visit to the site director. The list may be used to guide your conversations and determine the best way to obtain the required documentation.

Note: The specific documents needed vary depending on the type of site (i.e., child care center, adult care center, or at-risk center). Here is an example that may be used for a child care center:

- Staff training (Annual CACFP and Civil Rights) documentation
- Enrollment information for children enrolled in the care
- WIC poster displayed or program information is provided to parents
- “And Justice For All” poster displayed
- Building for the Future Poster displayed (unless site uses the Minnesota Department of Education (MDE) enrollment form)
- Current Department of Human Services (DHS) license
- Dated menus for all meals and snacks served
- Daily attendance records
- Daily meal count records
- Attendance and meal count records for the previous five days
- Food production records (required for vended meals) or alternative method to show enough food was purchased and prepared to meet meal patterns requirements
- Child Nutrition (CN) Labels or Product Formulation Statements (PFS) for convenience foods
- Ingredient labels or PFS for whole grain-rich items served during the current month’
- Infant meal notification letters or other form of documentation on file for all infants who are not receiving center-provided formula or infant food
- Infant food production records or infant menu record
- Infant formula the facility has in stock with expiration date
- Current Health Department “Food and Beverage License”
- Certified Food Manager certificate, if applicable
- Most recent health department inspection form
- Temperature logs
- Vended meals: Procedure if vended delivery is short quantity of food

### Quick Tip

While conducting off-site reviews, it may be appropriate for the sponsoring organization to review a sample of the documentation. For example, if a sponsoring organization is unable to obtain 100% of enrollment forms from the center, they may choose to review a random sample instead. When selecting a sampling method for reviewing documents, the sponsor must:

- Document the sampling method used; and
- Be able to explain its rationale during a State agency review.

## Go: Conduct the Off-Site Monitoring Visit

As opposed to on-site monitoring visits, off-site visits will likely be conducted in several steps:

1. Review all documentation that was provided by the site prior to connecting via phone or virtual platform.
2. Prepare a list of questions/clarification to address when connecting via phone or virtual platform.
3. Answer all questions on the monitoring form; be sure to also document:

- Date and time the review was conducted;
- Staff assisting with the desk audit;
- Note that the visit was completed via desk audit per COVID-19 waiver;
- Technical assistance provided; and
- Corrective action plan and any necessary follow-up.

Note: some questions on the form may not apply due to current United States Department of Agriculture (USDA) waivers. Refer to the [MDE Food and Nutrition COVID-19 Resources webpage](#) for a list of current CACFP waivers.

### **Quick Tip: Obtaining Signatures for an Off-Site Visit**

- Use the Fill & Sign feature of an electronic monitoring form (PDF).
- Request an emailed response confirming acknowledgment of the completed monitoring form.
- Request an email receipt (either “read” receipt or “delivered” receipt) in place of a signature.

### ***Maintaining Privacy while Using Technology***

When using technology such as video or photos, sponsors 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 site directors should be password protected or sent via other secure methods to ensure privacy.

Privacy of the site director and program participants is a key consideration when creating the remote review protocols. As the sponsor of a federal nutrition program it’s important to be proactive in protecting the privacy of the CACFP participants. The following is a list of other considerations regarding privacy:

- Obtain photo releases of the children, parents and staff in child care program.
- Many video platforms have access to and “own” the content on their sites; check their privacy policies.
- Ensure that the devices and platforms used are secure.

### **Quick Tip**

If requiring visual documentation of the environment and/or meal, ensure people are not in the photos or videos. In doing this, photo releases are not necessary.