



# DEPARTMENT OF EDUCATION


Townsend Building  
401 Federal Street Suite 2  
Dover, Delaware 19901-3639  
<http://education.delaware.gov>

Mark A. Holodick, Ed.D.  
Secretary of Education  
(302) 735-4000  
(302) 739-4654 - fax

April 26, 2023

## MEMORANDUM

**TO:** Directors of Residential Child Care Institutions  
Other Appropriate Personnel

**FROM:** Aimee F. Beam, MS, RD   
Education Associate, Nutrition Programs

**RE:** **SY 2022 - 2023 Operational Memo #23**  
**Information Regarding Oversight and Monitoring of School Meal Programs**

On April 6, 2023, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) released the following documents: SP 12-2023, Oversight and Monitoring of the School Meal Programs – Information Regarding Oversight and Offsite Strategies and Options; and SP 12-2023 Appendix, Onsite/Offsite Monitoring Guidance, School Meal Programs.

The purpose of this memorandum and appendix is to provide guidance regarding onsite and offsite strategies and options for oversight and monitoring of the school meal programs. Per USDA, *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.*

While this memorandum provides guidance to State Agencies (SAs) regarding onsite monitoring during Administrative Reviews, it is being shared with School Food Authorities (SFAs) at the direction of USDA. It also provides helpful information for SFAs regarding monitoring conducted by the SA. The memorandum is accompanied by an appendix which outlines review requirements and onsite/offsite strategies for SAs.

The documents are attached for your review. If you have any questions or need assistance, please contact us at 302-857-3356.

Attachments: SP 12-2023, SP 12-2023 Attachment

cc: Nutrition Team



Food and Nutrition Service  
Braddock Metro Center  
1320 Braddock Place  
Alexandria VA 22314

**DATE:** April 6, 2023

**MEMO CODE:** SP 12-2023

**SUBJECT:** Oversight and Monitoring of the School Meals Programs- Information Regarding Onsite and Offsite Strategies and Options

**TO:** Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

<b>Issuing Agency/Office:</b>	FNS/Child Nutrition Programs
<b>Title of Document:</b>	Oversight and Monitoring of the School Meal Programs- Information Regarding Onsite and Offsite Strategies and Options
<b>Document ID:</b>	
<b>Z-RIN:</b>	
<b>Date of Issuance:</b>	April 6, 2023
<b>Replaces:</b>	
<b>Summary:</b>	1) The purpose of this memorandum is to provide guidance regarding onsite and offsite strategies and options for oversight and monitoring of the School Meal Programs. 2) This memorandum impacts review requirements regarding the Fresh Fruit and Vegetable Program, School Breakfast Program, National School Lunch Program, including the Seamless Summer Option, and Special Milk Program. 3) This memorandum provides guidance to State agencies implementing the above programs.

The purpose of this memorandum is to provide guidance regarding onsite and offsite strategies and options for oversight and monitoring of the School Meal Programs.

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, onsite 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 onsite monitoring requirements, allowing State agencies to monitor Program operations offsite. Offsite monitoring helped ensure Program integrity while protecting the health and safety of staff and participants.

As outlined in SP 03-2023, [Offsite Monitoring of the Child and Adult Care Food Program and School Meal Program After the Public Health Emergency Ends](#), The Department of Health and Human Services recently announced that May 11, 20223 is the planned end date for the PHE. Given this expiration date, the FNS-issued nationwide onsite 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 offsite 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 offsite 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 onsite monitoring when it is required by regulations and what monitoring procedures are recommended when States have discretion to conduct monitoring on or offsite. 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 could be reviewed onsite versus offsite. Some operators may benefit from most review activities conducted onsite, and for others, onsite time may be better utilized on technical assistance. Please note that these on-site and off-site strategies apply to both congregate and non-congregate meal service options.

Accompanying this memorandum is an appendix that outlines the various review provisions and the onsite and offsite strategies and options applicable to the School Meal Programs.

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**

### **Onsite/Offsite Monitoring Guidance**

#### **School Meal Programs**

The intent of this document is to provide guidance to State agencies (SAs) on what elements of the School Meal Programs Administrative Review (AR) are required to be conducted onsite and information regarding State discretion for the review of the Programs offsite. Guidance is organized by module in the Administrative Review Manual. This resource also includes guidance on completing the entrance conference (which is optional) and exit conference (which is mandatory).

Traditionally, all questions and monitoring activities included in the offsite assessment tool were done offsite while all questions and monitoring activities included in the onsite assessment tool were done onsite. However, in many of these modules, States have the discretion to decide how monitoring will work best for their State and school food authorities, in line with regulations and recommendations from the Food and Nutrition Service. Please note that these on-site and off-site strategies apply to both congregate and non-congregate meal service options.

The chart below has three columns: Administrative review module and associated regulations, required and recommended onsite procedures, and offsite procedures.

Please note the following items.

Onsite monitoring is required in the following areas:

- Observance of meals; and
- Observance of counting and claiming procedures.

Onsite monitoring is highly recommended in the following areas:

- Sections of the AR that require the SA to validate school food authority-provided documentation.

Offsite monitoring options can be considered when:

- The SA can adequately obtain needed documentation in order to fully complete the review.
- Exchange of information containing personally identifiable information (PII) is conducted in a secure manner.
  - If information containing PII cannot be sent securely, then that portion **must** be conducted onsite.
- The SA can conduct interviews via phone call, email or video conference.
  - Ensure that all appropriate staff are notified and communication expectations are clear.

Refer to the following chart for details about how each Administrative Review Module must be conducted onsite and what can be completed offsite according to regulations.

Administrative Review Requirements		
Module and Regulations	Procedures to be Conducted Onsite	Procedures with Option to be Conducted Off-site
100- Certification and Benefit Issuance <a href="#">210.18(g)(1)(i)</a>	Recommendation: Follow up on unanswered questions, concerns, and/or potential errors onsite.	This module may be completed offsite when the SA can adequately obtain needed documentation.
200- Verification <a href="#">210.18(h)(2)(i)(B)</a>	Recommendation: Follow up on unanswered questions, concerns, and/or potential errors onsite.	This module may be completed offsite when the SA can adequately obtain needed documentation.
300- Meal Counting and Claiming <a href="#">210.18(g)(1)(ii)</a>	Requirement: Monitor meal counting and claiming procedures onsite.	Claim validation for the month of review and staff interview process questions: May be completed offsite when the SA can adequately obtain needed documentation.
400- Meal Components and Quantities <a href="#">210.18(g)(2)(i)</a>	Requirement: Validate meal items/components and quantities, complete meals, and meal signage on day of review onsite.	Week of menu review: May be conducted offsite when the SA can adequately obtain needed documentation (such as production records, standardized recipes, nutrition facts labels, CN labels, product formulation statements, USDA Foods information sheets, and menus).
500- Offer vs Serve <a href="#">210.18(g)(2)(i)(B)(3)</a>	Requirement: Validate offer versus serve is conducted correctly at the point of service onsite on day of review.	
600- Dietary Specifications and Nutrient Analysis <a href="#">210.18(g)(2)(ii)</a>	Recommendation: Validate dietary specifications onsite through observations and review of menu documentation.	Dietary specifications: May be conducted offsite when the SA can adequately obtain needed documentation, with onsite validation taking place.  Nutrient analysis (if required): May be conducted offsite when the SA can adequately obtain needed documentation.
700- Resource Management <a href="#">210.18(h)(1)</a>	Recommendation: Conduct onsite review activities depending on the needs of the school food authority and results of the Resource Management Risk Assessment Tool.	Resource Management Risk Assessment Tool: Required to be conducted offsite, with a SA option to interview further onsite.  Comprehensive Resource Management Review: May be conducted offsite when the SA can adequately obtain needed documentation.
800- Civil Rights <a href="#">210.18(h)(2)(ii)</a>	Requirement: Observe meal service to ensure non-discrimination onsite.  Recommendation: Validate the And Justice for All poster signage onsite.	Documentation review: May be completed offsite when the SA can adequately obtain needed documentation.

900- SFA On-site Monitoring <a href="#">210.18(h)(2)(iii)</a>	Requirement: School Food Authorities must conduct the monitoring reviews onsite per <a href="#">7 CFR 210.8(a)(1)</a> and <a href="#">7 CFR 220.11(d)(1)</a> .	Documentation review: May be completed offsite as long as the SA can adequately obtain any needed documentation.
1000- Local Wellness Policy <a href="#">210.18(h)(2)(x)</a>	Recommendation: Follow up on unanswered questions, concerns, and/or areas of noncompliance onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1100- Smart Snacks <a href="#">210.18(h)(2)(iv)</a>	Recommendation: Validate correct products and fundraisers onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1200- Professional Standards <a href="#">210.18(h)(2)(ix)</a>	Recommendation: Interview SFA personnel to determine compliance with Professional Standards requirements and to validate information gathered offsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1300- Water <a href="#">210.18(h)(2)(v)</a>	Recommendation: Validate access to water onsite.	
1400- Food Safety /Storage <a href="#">210.18(h)(2)(vi)</a> <a href="#">210.13(d)</a>	Recommendation: Validate posting of Food Inspection Report onsite.  Recommendation: Review storage documentation (e.g., temperature logs) onsite.  Recommendation: Walk through storage areas (cold/dry) onsite.  Recommendation: Review meal service operation to ensure food safety compliance onsite.	Hazard Analysis Critical Control Point (HACCP) manual review: May be conducted offsite when the SA can adequately obtain any needed documentation.  Health inspection dates: May be reviewed offsite when the SA can adequately obtain any needed documentation.
1400- Buy American <a href="#">210.21(d)</a>	Recommendation: Validate Buy American food labels/products onsite.	Documentation (e.g., solicitations) review: May be completed offsite and in line with any procurement oversight when the SA can adequately obtain any needed documentation.
1500- Reporting and Recordkeeping <a href="#">210.18(h)(2)(vii)</a>	Recommendation: Follow up on unanswered questions, concerns, and/or areas of noncompliance onsite.	Documentation review: May be completed offsite and through staff interview when the SA can adequately obtain any needed documentation.
1600- SBP and SFSP Outreach <a href="#">210.18(h)(2)(viii)</a>	Recommendation: Follow up on unanswered questions, concerns, and/or areas of noncompliance onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1700- Afterschool Snack <a href="#">210.18(e)(3)(i)</a>	Recommendation: Observe snack service at the SA's discretion.	Documentation review (menu, meal counts): May be completed offsite when the SA can adequately obtain any needed documentation.
1800- Seamless Summer <a href="#">210.18(e)(3)(ii)</a>	Requirement: Review meal counting and claiming and observe meal service onsite.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
1900- Fresh Fruit and Vegetable Program <a href="#">210.18(e)(3)(iii)</a>	Requirement: Review FFVP service onsite.	Claim validation: SA has discretion to validate claims (including the limit of 10% for

		administrative costs and allowable food and non-food purchases, claim system records) offsite when the SA can adequately obtain any needed documentation.
2000- Special Milk Program <a href="#">210.18(e)(3)(iv)</a>	Requirement: Review onsite if the SA has identified documentation problems or meal counting or claiming errors in the reviews conducted under the National School Lunch Program or School Breakfast Program.	Documentation review: May be completed offsite when the SA can adequately obtain any needed documentation.
2100- Special Provisions <a href="#">245.9</a>	Requirement: Review meal counting and claiming and observe meal service onsite.	Documentation review: Claims and claiming percentages may be completed offsite when the SA can adequately obtain needed documentation.
Pre-K Checklist, AR Manual, page 70	Requirement: Complete review activities onsite given the connection to meal pattern review and meal service observation.	
Entrance Conference <a href="#">210.18(i)(1)</a>	Recommendation: Conduct onsite to increase rapport and allow for questions. At a minimum, conduct a meeting once the SA arrives onsite to start the review, confirm activities, and determine key contacts for the review, etc.	May take place offsite/virtually.
Exit Conference <a href="#">210.18(i)(2)</a>	Recommendation: Conduct onsite to increase rapport and allow for questions. At a minimum, conduct a meeting at the conclusion of the onsite review to summarize assessment and outline timeframes, corrective action plan etc.	May be conducted offsite/virtually.