

School Food Authority Monitoring of the School Meal Programs School Year 2020-2021¹

Off-site Monitoring During the COVID-19 Public Health Emergency Issued November 2020

During the current public health emergency school food authorities 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 #41; Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the School Meal Programs](#) is in effect through June 30, 2021. This waiver allows for all review elements found at 7 CFR 210.8 and 220.11 to be conducted off-site for the National School Lunch Program and School Breakfast Program. School food authorities are required to complete these reviews annually by February 1 unless a waiver of this requirement has been approved.

Off-site Monitoring Strategies

The required review elements found at **7 CFR 210.8 and 220.11** can be completed off-site by reviewing documents, electronic systems, or by using other means of technology. Off-site, school food authorities may review and verify records that have been texted, emailed, or otherwise provided, or through virtual observation, for example, by using video. School food authorities may also conduct interviews with school staff and Program participants to verify information in photos via telephone or video conference. School food authorities may wish to use the [Food and Nutrition Service on-site review checklist](#) or other means to document that the review was completed. School food authorities should use the documentation and information provided by the site to answer any questions in the checklist or otherwise document the information required to complete the review.

When using technology such as video or photos, Program operators 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.

School food authorities should 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 school food authority staff interacted with virtually; and
- Any technical assistance the school food authority provided.

If any of the required review elements cannot be fully completed within the required review time frame school food authorities 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.

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.