

Child and Adult Care Food Program (CACFP) Desk Audit Guidance for Sponsoring Organizations for Fiscal Year 2019-2020 and 2020-2021

Purpose

In response to COVID-19, USDA released a nationwide waiver on March 27, 2020, that waived pieces of the monitoring requirements for CACFP to maintain the safety of all individuals, but did not waive the requirement that unannounced visits of current participating sites and providers must be performed on-site. On August 4, 2020, USDA released [COVID-19: Child Nutrition Response #39: Nationwide Waiver of Onsite Monitoring Requirements for Sponsors in the Child and Adult Care Food Program](#), which waives the on-site monitoring requirements for CACFP monitoring visits to maintain social distancing efforts until September 30, 2021.

To ensure Program integrity, Sponsors must continue to monitor sponsored sites and providers to ensure they are operating in compliance with regulations. Sponsors should consider performing on-site visits for sites or providers, if it is allowed under current public health recommendations. If on-site monitoring is not feasible, off-site monitoring can be performed in replacement of an on-site review through a desk audit. Monitoring and oversight can include a variety of different methods to collect the required information needed to complete an off-site review with success.

Nationwide Monitoring Flexibilities for Fiscal Year 2019-2020

Below outlines the monitoring flexibilities USDA granted through nationwide waivers on March 27, 2020, and extended on August 4, 2020, until September 30, 2020. Sponsors must meet the requirements below for operating sites or providers.

- CACFP sponsors must conduct at least two reviews of their CACFP sites.
- Only one CACFP site review must be unannounced.
- Unannounced site visits do not have to include a meal service observation.
- Site visits can have more than six months elapsed between visits.
- On August 4, 2020, the on-site review requirement was waived until September 30, 2021.
- Pre-approval visits and visits within the first four weeks of operation are still required for new sites or providers.

Monitoring Requirements for Fiscal Year 2020-2021

Sponsors of sites or providers must meet normal monitoring requirements for sponsored programs during FY20-21. However, these visits may be performed off-site through the nationwide waiver released on August 4, 2020. Below outlines the monitoring requirements Sponsoring organizations must meet.

- CACFP sponsors must conduct at least three reviews of their CACFP sites.

Contact Information:

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- At least two of the three reviews must be unannounced.
- At least one of the unannounced reviews must include a meal service observation.
- No more than six months may elapse between visits.
- Pre-approval visits and visits within the first four weeks of operation are required for new sites or providers.

Desk Audit Review Guidance

Although monitoring reviews may not be able to be conducted on-site, it is still important that Sponsors monitor operations of participating CACFP sites or providers. Sponsors will still be expected to complete the required monitoring visits (pre-approval visits, first visit within four weeks of operation, site monitoring reviews and follow-up visits) for all sites or providers. However, this can now be accomplished through a desk audit off-site.

Desk reviews may be used for paperwork-centric areas such as enrollment and income eligibility forms, menus, meal records, meal counts, five-day reconciliation, five-day reconciliation, receipts and monthly expenditures (if applicable), and training completion documentation. Providers and sites sending personal identifying information to Sponsors via email should be sent in a secure email to protect this information. Sponsors should consider developing a comprehensive checklist of documents needed for review to send to providers and sites. It would still be expected that the Sponsor complete the applicable site review form when performing desk reviews for documentation purposes.

Once the monitoring review is completed, the Sponsor must review the form with the provider or site via telephone, email or video call to go over any findings, corrective action or technical assistance needed. Sponsors are still expected to prescribe and document corrective action as they would under normal circumstances. The Sponsor will then provide the form to the provider or site supervisor to sign, which can be done through mail, fax, or email, and submitted back to the Sponsor. Electronic signatures are an acceptable method to obtain verifying signatures from the site supervisor or provider. All review forms must be maintained on file for at least three years, plus the current year.

Sites and providers must still comply with regulations that have not been waived through nationwide or state-specific waivers. Sponsors should continue to perform visual observations of meal preparation and service, meal counting, verification of attendance, and food safety and sanitation issues during off-site reviews. Examples of alternative observation methods Sponsors can utilize are live video call via phone or computer to observe visual parts of the review such as meal preparation, meal service, and food storage and safety. Photos and/or pictures of food storage, meal preparation and meal service can also be submitted as proper documentation if the Sponsor can verify compliance.

CACFP Monitoring Forms

All of the monitoring forms for Sponsors of sites are available on the Vermont Agency of Education Child Nutrition Programs [CACFP page](#). Day Care Home (DCH) Sponsors can contact the State agency for additional monitoring forms.

- [CACFP Planned Monitoring Schedule](#)

- [CACFP Monitoring Log](#)
- [Site Review Form](#)

Pre-Approval Visits

Sponsors of sites and DCH Sponsors may continue to bring on new sites and providers during this time if they meet all licensing regulations or applicable state or local laws. Sponsors must perform pre-approval visits of new sites and providers prior to operation of the CACFP.

Sponsors have a variety of ways they can continue to fulfill the pre-approval visit requirements. Sponsors can perform pre-approval visits over the telephone or computer and provide materials via mail or e-mail. Pre-approval visits must cover Program benefits and requirements and Sponsors must ensure providers and sites can provide their proposed food service operations. An application and program agreement must be completed between the DCH Sponsor and provider, entered into the CNP application and claiming system and approved by the State agency for the provider to participate in the CACFP. Sponsors of sites must complete an online site application, submit the additional required documentation and must be approved by the State agency prior to operation. It is suggested that Sponsors continue to conduct pre-approval visits in a similar fashion as if they were performed on-site.

In order for the Sponsor to ensure the provider or site can provide appropriate meal services, the Sponsor should request the provider or site to provide other alternative forms of documentation for observation. Examples include live video call or photo and/or pictures of food storage, meal preparation and meal service.

Visits within the First Four Weeks of Operation

Within four weeks of a new site or provider operating the CACFP, Sponsors must complete the required first visit. This visit does not have to occur on-site for the remainder of FY19-20 and for FY20-21. The Sponsor should review all hardcopy materials that are typically reviewed during an on-site review. Records can be mailed, faxed, e-mailed or delivered to the Sponsor by the site or provider. This would include reviewing copies of up-to-date attendance records, enrollment and income eligibility forms (if applicable), master lists (if applicable), menus, meal counts, performing the five-day reconciliation, and training completion materials.

Technical Assistance

Sponsors are expected to continue offering technical assistance as necessary to their providers and sites. This may include phone calls, e-mail communications, video calling or other methods of virtual communication. Technical assistance may be documented by maintaining a log of communications including topic(s) covered, names of people in attendance, method of communication (phone call, e-mail, etc.), date of communication and a verifying signature.

Annual Training Requirements

Sponsors, their sites and providers are still required to meet annual training requirements, and Sponsors should plan methods of meeting annual training requirements before the fiscal year ends on September 30, 2020. This could include e-mailing webinar opportunities to sites and

providers, enrolling staff in online trainings, or holding trainings with staff over virtual meetings. All trainings must be documented with the date of the training, individual performing the training, and names and signatures from attendees. Trainings may be documented using the [CACFP Training Certification Sheet](#). If signatures from attendees cannot be obtained, certificates could be created by the Sponsoring organization to provide to attendees to document attendance of the training.

State Agency Reviews

In response to COVID-19, on March 27 and April 24, 2020, USDA released two nationwide waivers, which waived the annual review and on-site requirements for State agencies in the CACFP. The State agency has suspended the remaining CACFP administrative reviews for FY19-20. Programs scheduled to be reviewed in FY19-20 will now be reviewed in FY20-21. On August 4, 2020, USDA extended the nationwide waiver suspending the requirement to perform CACFP administrative reviews on-site until September 30, 2021. This waiver continues to support social distancing efforts to maintain the safety of all Program operators during COVID-19. Therefore, the State agency will resume CACFP administrative reviews beginning October 1, 2020, and those reviews will consist of a paperwork review through a desk audit. Additional CACFP State Agency Administrative Review Desk Audit Overview will be released at a future date.