

South Carolina Department of Social Services
CACFP Monitoring Requirements during Novel Coronavirus Outbreaks
Centers



The following information is intended to provide additional guidance to center sponsors on required monitoring activity during the Novel Coronavirus Outbreak.

FNS waives, for all CACFP sponsoring organizations that elect to be subject to this waiver, CACFP monitoring requirements at 7 CFR 226.16(d)(4)(iii) as follows:

- a) CACFP sponsors may conduct two reviews of their CACFP facilities;
- b) Only one CACFP facility review is required to be unannounced;
- c) FNS waives that at least one unannounced review must include observation of a meal service;
- d) FNS waives the requirement that not more than six months may elapse between reviews;
- e) CACFP sponsoring organizations must still, per CFR 226.16(d)(4)(iii)(C), conduct at least one review during each new facility's first four weeks of Program operations but this review may be conducted as a desk audit.

Consistent with section 2202(a)(2) of the Act, the above waivers apply automatically to all sponsoring organizations that elect to use them, without further application through June 30, 2020. However, because of SCDSS reporting requirements to USDA, SCDSS CACFP requires each sponsoring organization which will participate in any of the monitoring waivers to complete and submit the *Institution Election to Participate in Nationwide Waiver Regarding Monitoring Requirement for Sponsors Due to COVID-19 Emergency form*.

Documentation Requirements

Sponsors are required to maintain records to document compliance with Program requirements. This will include

- Documentation of the USDA FNS issued waivers,
- Documentation of the completed *Institution Election to Participate in Nationwide Waiver Regarding Monitoring Requirement for Sponsors Due to COVID-19 Emergency*
- Documentation of the SCDSS CACFP acknowledgement of receipt of the completed Waiver Election form
- Completed *Monitor Review Form - CENTERS*

New Centers

- Preapproval reviews for new CACFP centers

Sponsoring organizations are required to conduct preapproval reviews for new centers applying to participate in the CACFP during the coronavirus pandemic. However, for sponsors that elect to use the monitoring waivers of onsite monitoring for new facilities, the pre-approval review may be conducted off-site through a desk audit. In accordance with federal regulations, 7 CFR 226.16(d)(4), during the pre-approval review, the monitor or sponsor representative must discuss Program benefits and requirements and make sure that the center is capable of providing the proposed food service.

Sponsors may complete the pre-approval review through telephone call(s) and video communications (video chats, video conferences, etc.) with centers. Sponsors must also complete and sign the *Preapproval Training Checklist for Daycare Centers* and the *Kitchen*

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Attachment. The center representative must sign the Checklist. Sponsors may mail, scan/email or fax a blank form to the center to review/sign while the sponsor representative discusses the requirements. The signed form would then be returned to the sponsor.

- Monitoring during the first four weeks of Program Operations

Centers that are new to CACFP must be reviewed at least once during the first four weeks of Program operations. For sponsors that elect to use the monitoring waivers of onsite visits, this review may be conducted off-site through a desk audit. During this review, sponsors should go over the primary Program topics such as meal counts, recordkeeping, and the meal pattern requirements. Sponsors are also required to complete the *Monitor Review Form - Centers*. SCDSS CACFP has identified forty-eight (48) areas of the form which must be completed by obtaining information from the sponsor's file, telephone call with the provider and review of records submitted by the provider. Items 44 and 45 must be completed through a review of records at the sponsor's office. It is expected that the monitoring review during the first four weeks will be an announced/scheduled review.

Other required review

Under the USDA Nationwide Waivers Regarding CACFP Monitoring, sponsors that elect to use the monitoring waivers are required to conduct two monitoring reviews of centers. Sponsors are required to complete the *Monitor Review Form - Centers*. SCDSS CACFP has identified forty-eight (48) areas of the form which must be completed by obtaining information from the sponsor's file, telephone call with the provider and review of records submitted by the provider. Since the USDA Nationwide Waiver requires at least one monitoring review to be unannounced, any telephone calls to the provider to obtain information for an unannounced review cannot be scheduled with the center. Items 44 and 45 must be completed through a review of records at the sponsor's office.

Existing Centers

Under the USDA Nationwide Waivers Regarding CACFP Monitoring, sponsors that elect to use the monitoring waivers are required to conduct two monitoring reviews of sponsored centers. Sponsors that conducted two reviews for sponsored centers during Program year 2020 (October 2019 – September 2020) prior to the issuance of the USDA Nationwide Waivers Regarding CACFP Monitoring are not required to conduct another monitoring review.

If only one monitoring review was conducted during the period of October 2019 through March 2020, at least one additional monitoring review is required. Sponsors are required to complete the *Monitor Form - Centers*. SCDSS CACFP has identified forty-eight (48) areas of the form which must be completed by obtaining information from the sponsor's file, telephone call with the provider and review of records submitted by the provider. Since the USDA Nationwide Waiver requires at least one monitoring review to be unannounced, any telephone calls to the provider to obtain information for an unannounced review cannot be scheduled with the center. Items 44 and 45 must be completed through a review of records at the sponsor's office.