DATE: April 6, 2023

MEMO CODE: SFSP 06-2023

SUBJECT: Oversight and Monitoring of the Summer Food Service Program - Guidance on On-site and Off-site Strategies and Options

TO: Regional Directors
    Special Nutrition Programs
    All Regions

    State Directors
    Child Nutrition Programs
    All States

Issuing Agency/Office: FNS/Child Nutrition Programs

Title of Document: Oversight and Monitoring of the Summer Food Service Program - Guidance on On-site and Off-site Strategies and Options

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Date of Issuance: April 6, 2023

Replaces: 

Summary: 

1) The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Summer Food Service Program. 2) This memorandum impacts review requirements regarding the Summer Food Service Program and provides guidance to State agencies and local operators implementing the Program.

The purpose of this memorandum is to provide guidance regarding on-site and off-site strategies and options for oversight and monitoring of the Summer Food Service Program (SFSP).

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, on-site 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 on-site monitoring requirements, allowing State agencies to monitor Program operations off-site. Off-site monitoring helped ensure Program integrity while protecting the health and safety of staff and participants.
FNS understands that State agencies quickly adapted review and monitoring procedures to include off-site 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 on-site monitoring and when it is required by regulations, when States have discretion to conduct monitoring off-site, and when FNS recommends utilizing any applicable discretion to conduct monitoring off-site. In addition, with State agency approval, local operators may utilize the guidance in this memorandum. While some review procedures are required in regulation to be conducted on-site, many are not. During the PHE, State agencies were able to find effective and efficient ways to monitor areas of the review off-site that are traditionally conducted on-site. However, some areas of the review that have flexibility to be conducted off-site are best reviewed on-site or may be challenging to conduct off-site. 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 review elements could be examined on-site versus off-site. Some operators may benefit from most review activities conducted on-site, and for others, on-site 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 review requirements and the on-site and off-site strategies and options applicable to the SFSP.

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,

JESSICA SARACINO
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