

**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.