



## CACFP FDCH Off-Site Monitoring Guide

The COVID-19: Nationwide Waiver of Monitoring Requirements for CACFP Sponsors allows for monitoring visits to be completed off-site (e.g. as desk audits) and **is effective until 30 days after the end of the public health emergency.**

### Pre-approval Visits

Off-site methods for completing pre-approval visits must be in-line with the sponsor's procedures for supplying each new FDCH with their orientation/training materials, manuals etc. and reviewing these materials with them during a virtual visit.

### FDCH Home Reviews

Off-site methods may be used to complete both first 4-week AND regular reviews.

- Cover the required components, to the best ability, as advised on pages 2 and 3 of this guide
- Use the sponsor's regular home visit form to document the review
  - Note the review was completed off-site
- Include some form of a virtual visit and a desk audit over a period of one or more days
  - **Virtual Visits (FDCH Interviews)** may be by any interactive means such as video calls (i.e. Microsoft Teams, Zoom, FaceTime), phone calls, on-line chats, etc. They may occur before or after hours of operation if mutually agreed to by both the FDCH and monitor.
  - **Desk audits** include reviewing:
    - Prior review records to follow-up on any problems and menu/product information review.
    - Database information to review submitted claims and child enrollment information.
    - Sponsor's administrative files to review FDCH records kept within the sponsor's administrative files, such as special dietary needs documentation.
    - FDCH's submitted records electronically (photos or scanned copies within emails, texts, online communication apps, etc.), or regular mail or drop-off, if electronic is not feasible. Online communication apps may include uploading documents to a shared Google Drive, Dropbox account, Microsoft Teams, etc. *FDCH submitted records that may be reviewed by desk audit include attendance records for the 5-day rec, food packaging, current month's paper menus/meal counts, and photos of meals prepared / foods on-hand.*
- **NOTE:** FDCH's submitted records must only be retained on file when discrepancies/findings are identified.
- **The Completion Date of the Review**

Sponsors may choose the completion date that will go on record for database tracking purposes, e.g. when the virtual visit portion was completed or when the review was fully complete (*both virtual visit & desk audit finished.*) They may also decide whether the completion date will be the same for all reviews or vary by review depending on different scenarios.

  - The sponsor's off-site monitoring policies and procedures should specify what will be considered as the completion date.
- **Upon completion of the off-site review**, electronically transmit, email, or mail a copy of the home visit form to the FDCH requesting they reply back confirming they received it and agree to its terms. FDCH's reply may serve as documentation of the FDCH's signature/certification on the home visit form. The FDCH's certification reply may be received by email, text, mail, or phone call. → Phone call replies must be notated on the home visit form.
- **Reminders**
  - Parental permission is required when photos and recorded videos are taken of their children.
  - CACFP-related written communication, including texts via personal devices, are subject to public record requests.

### Data collection of completed off-site monitoring

Be prepared to submit information on completed off-site pre-approval visits and reviews. DPI must collect this data for USDA's waiver reporting requirements.

# CACFP FDCH Off-Site Monitoring Guide

## Off-Site Reviews – Required Components

The six (6) components listed below **must be reviewed**, to the best ability, to count as an off-site review. Suggestions for how to cover each of these components are provided within the bullet points.

Use best judgement on covering other areas such as sanitation/safety, civil rights, and distributing WIC information.

- **Sponsor Policies and Procedures**

- Establish policies and procedures to be followed by all monitoring staff, including ground rules set using sponsor discretion for what comprises an unannounced virtual visit (see *Unannounced Virtual Visits* section below).
- Notify FDCHs prior to implementing policies and procedures that may impact their operation and meal reimbursement. (i.e. modified “attempted visit” policy and procedure for off-site reviews)

- **Unannounced Virtual Visits**

An unannounced virtual visit may be achieved by giving no or limited notice to the FDCH to target compliance areas most prone to variances between announced and unannounced reviews. Use sponsor discretion in order to be the most true, as possible, to the intention of being unannounced.

- Examples of giving no or limited notice are contacting the FDCH the morning of, within a specified amount of time beforehand on the day of the virtual visit etc.
- Examples of compliance areas to target are checking the children present at the time of the virtual visit (and participating in meal service, if observed), meal service requirements if observed (*creditable foods; minimum required portion sizes served to each child, pre-plated/family style dining requirements, children with special dietary needs are correctly accommodated*), etc.

Documenting Unannounced Virtual Visits:

Record compliance areas targeted for the unannounced portion and if limited notice was given, how it was given to the FDCH, i.e. by noting when the preliminary contact was made before completing the virtual visit.

### 1. Verifying Current Regulation (License/Certificate)

Optional sources to use for comparing to the FDCH’s regulation information in the sponsor’s database for verifying the sponsor’s information is current include:

- The FDCH’s regulation information within DCF’s WISCCRS database or public website of regulated FDCHs
- The FDCH’s license/certificate currently posted in their home, either obtained by the FDCH submitting a copy/photo or viewing it directly during a video call.

### 2. Verifying current month’s menus/meal count records for completeness & meal pattern compliance

Review all meals of current month’s menus/meal counts from the first of that month through the HV date.

- On-line claimers:
  - Review menus/meal counts submitted online thus far.
- Paper claimers (*and on-line claimers who initially record menus/meal counts on paper for later online entry*):
  - Contact the FDCH and request them to send copies/photos of their current month’s menus and meal counts electronically (*email/text/fax*), within a reasonable amount of time that day.
  - If the FDCH cannot submit electronically or within a reasonable amount of time, obtain each day’s menu and meal count information for each meal over the phone by the having the FDCH list the children recorded in the meal counts and foods recorded for each meal component.

### 3. Completing the 5-day meal reconciliation

Use DPI’s [Required Procedures for Completing the 5-Day Meal Reconciliation \(GM D\)](#)

- Selecting the 5-consecutive day period of meal counts: It may be easiest to select 5 consecutive days of completed meal counts from the most recently submitted claim, especially for paper claimers.
- Obtain attendance records by any of the following ways:
  - The FDCH submitting copies/photos of their sign in/out sheets or an attendance record template completed with daily attendance information transferred from their sign in/out sheets
  - Running an attendance report from the sponsor’s database for online claimers who have entered their daily attendance information into the system by transferring it from their sign in/out sheets.
  - By having the FDCH give their attendance information over the phone

# CACFP FDCH Off-Site Monitoring Guide

## 4. Reviewing Menus and Foods On-hand by Desk Audit and Virtual Visit

- **1+ Year Olds - Review of menus and product documentation for meal pattern compliance**  
(grains counted as WGR, yogurt, store-bought combination items, tofu, and cereals not on *WIC Approved List*)  
Use the home visit menu and product documentation review log process to record the items identified on reviewed menus, foods on-hand/product documentation available during the virtual visit, and whether each of these foods are creditable.
  - FIRST 4-WEEK REVIEWS FOR NEW FDCHS
    - Review menus for the current month
    - Review product documentation for **at least 1 food on-hand for each type of item** on the reviewed menus
      - Product documentation for all foods on-hand that were not reviewed at the first 4-week visit must be looked at during the next review.
  - REVIEWS FOR FDCHS WHO ARE NOT NEW
    - Review menus for entire month of most recently processed claim and current month up to the visit date
    - Review product documentation for both:
      - (1) Foods that were not on-hand for menu items identified during prior review(s) (as follow-up); and
      - (2) Different or new foods on-hand that were not reviewed at prior reviews

### Ideas for how FDCHs may submit product information for foods on-hand:

- Send a list of the foods on-hand with their specific names and brands; then, the monitor searches online to find their product information
  - Send photos by text/email or copies by regular mail
  - Show the product information to the monitor by video call
  - Read the product information to the monitor by phone
- **Infants: Review of menus and foods/formulas/breast milk on-hand**  
Use the home visit infant review log process to record items identified on the reviewed menus and foods/formula/breast milk on-hand for each infant discussed during the virtual visit with the FDCH.

## 5. Reviewing Infant Requirements by Desk Audit and Virtual Visit

- Review infant meal notification information for currently enrolled infants within database or current *Review Worksheet/Child Information Form*.
- During virtual visit with the FDCH, discuss their overall practices to verify they:
  - Enroll all infants in the CACFP
  - Supply at least 1 type of iron-fortified infant formula; confirm type of formula offered
  - Supply foods for each infant's meals once developmentally ready

## 6. Reviewing Special Dietary Needs (SDN) Requirements by Desk Audit and Virtual Visit

- Review SDN documentation on file in office, for each child with SDN, to compare to meals claimed
  - SDN Tracking Form Information
  - Medical statements (disability) or written family requests (non-disability)
- Review claim
  - Verify the FDCH is only claiming for reimbursable meals according to the child's SDN documentation.
- During the virtual visit with the FDCH, discuss foods actually served to each child with SDN and/or any children who are served meals that vary from the menu.
  - Check for any children with new SDN.
  - Verify the FDCH is serving meals that are in-line with each child's SDN documentation.