



Issue Brief

Remote Monitoring in the CACFP

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Audience:	Sponsoring Organizations of Family Child Care Providers, Sponsors of Child Care Centers, State Agencies, and anyone else in the CACFP Community interested in the topic

Issue Brief: Remote Monitoring for CACFP Sponsors

In March 2020, the Families First Coronavirus Response Act was signed into law. This law gave the United States Department of Agriculture Food Nutrition Services (USDA FNS) the authority to create flexibilities for regulations to operate child nutrition programs, including the Child and Adult Care Food Program (CACFP), within the reality of operations during a pandemic. These flexibilities came in the form of nationwide waivers that state agencies could opt into using. Over the three years USDA FNS has offered a [multitude of waivers to provide these flexibilities. One of these flexibilities was the "Nationwide Waiver of Monitoring Requirements for Sponsors in the Child and Adult Care Food Program, Extended through August 2020, Extended through September 2021, Extended until 30 days after the end of the public health emergency." The White House recently announced the Public Health Emergency will end on May 11, 2023](#) which means that the nationwide waiver allowing virtual visits will also end on June 10, 2023 (June 30, 2023 for the state of California).

[USDA FNS has provided guidance via memo CACFP 02-023 Offsite Monitoring of the Child and](#)

[Adult Care Food Program after the Public Health Emergency Ends.](#) It states that monitoring will return to pre pandemic policies, procedures, rules, and regulations on June 10, 2023. The USDA FNS can make changes to the rules regarding monitoring; there is not a need for an act of Congress. Individual states can also seek statewide waivers regarding monitoring from USDA FNS.

This issue brief and the forum to follow, on March 16, 2023, will provide an opportunity for the CACFP community to explore the practical application, the policies and procedures, and the challenges and benefits of virtual monitoring. The brief will help the community to thoughtfully deliberate remote monitoring policies and practices. The deliberation could lead to recommendations for USDA FNS and state agencies that reflect the experiences of the community. The brief and the forum are not reflective of state agencies' annual review remote processes. This is focused on sponsors monitoring their centers and/or family child care homes and what those policies, procedures, and practices reflect.

Below is an outline of the practices put in place during the pandemic, and the benefits and challenges of monitoring flexibilities. Outlined after that are three options that could be adopted moving forward, their primary drawbacks, different ways to approach the options, and then questions to deliberate. When reading these options, we encourage you to think of your own experience, the experience of those you work with, and a future of monitoring in CACFP that promotes program access, integrity, technical assistance, and financial sustainability.

Practices Put in Place

CACFP Sponsors put in place policies and practices to ensure program integrity while monitoring remotely. They considered:

- Virtual platforms that suited the needs of the meal service providers and the monitoring sponsor Equitable access to virtual platforms
- Maintaining the “unannounced” aspect of the reviews
- Strategies for “seeing” and documenting the meals for the required meal observation Privacy of the children in attendance at the child care facility when capturing images for documentation
- Procedures/policies for providers who were unresponsive to virtual reviews Effective technical assistance during a virtual review
- Confirmation and sign-off of monitoring review
- Determination of a need for in-person monitoring and technical assistance Revised budgets based on no travel for those doing the monitoring

These policies and practices were refined over the years to leverage a newfound comfort with technology from both organizations and individuals to meet necessary pandemic modifications.

Benefits of the Monitoring Flexibility

There are a variety of benefits that stemmed from the monitoring waiver. These include:

- **Cost-effective** model of monitoring child care facilities serving meals. Sponsors did not have to pay for transportation/travel expenses (e.g., gas, overnight stays, plane travel, meal reimbursements). See Appendix 1 for real-world examples of 2019 mileage reimbursements of family child care home sponsors in California.
- **Improved equitable access** to meals served through the CACFP, in particular by family child care providers that didn't previously have access to the program. CACFP Sponsors now have the capacity to enroll and monitor sites in geographical areas that have been historically difficult to serve due to the high cost of labor and travel. Often times these historically difficult areas to serve are the most in need of CACFP access.
- **Greater language justice** as providers were able to speak with a monitor in their first language which is key to a provider's success on the program. It is difficult to recruit, hire, and maintain a qualified staff-person that speaks languages of the providers in each geographic area that requires in person monitoring.
- **Removal of extended disruptions** to educational programs and meal service that occur during an in-person monitoring visit. Providers and CACFP sponsors can leverage the streamlined nature of the virtual visit. Child and adult services are not interrupted due to the visit and if there is disruption it is for a very limited amount of time in comparison to an in-person visit.
- **Easier to meet the provider/operator's individual needs** with customizable formats¹ for monitoring improves program access. This enabled sponsors to work within fiscal and human capital constraints, as well as to work within providers' comfortability with in-person interactions.
- **Decreased greenhouse gas emissions** by not requiring travel to the multitude of sites served by CACFP Sponsors. Sponsors travel across the state(s) they serve to get to these sites three times a year. In addition, less driving reduces potential for auto accidents.
- **More nutrition education, outreach, and improved program quality** as a direct result of less travel, time saved, and increased staff time for training and developing individualized technical assistance.
- **Modernization of the program** through regular use of new technology, such as Facetime and Zoom has contributed to accessibility and efficiency.

¹ In- person, virtual, hybrid

Challenges of the Monitoring Flexibility

Policies and practices are varied across sponsors, programs, and states which could lead to inequities and inefficiencies in access to meals served through CACFP. The following are challenges experienced during the pandemic when sponsors were implementing the monitoring flexibilities:

- **Providing needed technical assistance** can be a challenge with some providers who require extra help with technology.
- **Understanding expectations and requirements** from USDA FNS and states as sponsors created their own policies and procedures without official guidance from the state and/or USDA FNS.
- **Protecting the privacy of children and providers** while using videos and photography for program documentation.
- **Ensuring unannounced visits were truly unannounced** and implementing reasonable practices and procedures for following up on missed virtual visits.
- **Maintaining integrity** while navigating the new practices.

Options

This issue guide presents three options that could be adopted moving forward, each coming from a different perspective and each reflecting a different set of ideas about what should be done. Most people will find something to agree with in all three approaches, but each also has trade-offs, risks, or drawbacks that must be taken into account and worked through. The options presented here are not ready-made solutions but rather starting points for weighing alternatives and reaching sound judgments. ([NIFI, 2020](#))

Option 1: All Remote Monitoring Policies Allowed

- **Option Defined:** This means that federal regulations would allow the initial 30-day visit² of a new provider and all three required visits in a program year to be virtual. It becomes a state option and then it would become a sponsor option. This option would mean that states and/or sponsors could choose to do all virtual or all in-person or a hybrid model.

² *Refers specifically to sponsors visiting new sites/providers (not the state's preapproval visit) - Ref: 7 CFR 226.16(d)(4)(iii) (C)

- **Primary Drawback:** A lack of standardization could create disparities across states and inequitable access for providers/operators to CACFP.

Ideas to Approach	Drawbacks
<ul style="list-style-type: none"> • States opt-in and create policies 	<ul style="list-style-type: none"> • Differentiation among states on how to handle visits • Inequities among states and then overcomplicates for multi-state sponsors States may overcomplicate the rules and policies sponsors must follow
<ul style="list-style-type: none"> • USDA creates specific guidelines for when in-person visits are necessary 	<ul style="list-style-type: none"> • Cumbersome and complicated, it may end up like the serious deficiency process
<ul style="list-style-type: none"> • Any approach for all virtual 	<ul style="list-style-type: none"> • Integrity may not be as supported as in person visits • Technical assistance width (in that can reach a lot) but not deep (in that the depth of the T/A is limited) • While some CACFP operators are used to technology or acquired access to it, there are many who still have not • Disconnect between the integrity/technical assistance monitors and onsite providers • Electronic data storage may be an increasing expense

Questions for Deliberation

Thinking about your own state and sponsorship, has program integrity been maintained using virtual visits? Is there a risk in doing all virtual visits? Is there an element of T/A or trust building lost?

This option assumes that all states will be as flexible with the rules that USDA sets forth. However, as we saw during the pandemic waiver allowances some states were anxious to get back to in-person visits. If USDA allowed all virtual visits and, as always, states can make the rules stricter if they'd like, how do you think that would impact access to the CACFP? How do you think your state would implement such a policy change? Is all virtual too flexible?

Option 2: Hybrid Monitoring Policies

- **Option Defined:** The USDA would define exactly what hybrid policies would be allowed. For example, one unannounced meal observation must be in person (onsite) as well as the initial site visit.
- **Primary Drawback:** A federal approach lacks the flexibility states, localities, and sponsors need to effectively and efficiently approach the nuances of their communities.

Ideas to Approach	Drawbacks
<ul style="list-style-type: none"> • One unannounced meal visit must be in person (onsite), plus the initial site visit. <p>The additional two visits could be virtual if there are no significant findings.</p>	<ul style="list-style-type: none"> • Limits access in rural areas • Re-establishes required travel, increasing costs, time spent driving/traveling, and greenhouse emissions • Limits language accessibility • Defining “significant” could present problems/confusion
<ul style="list-style-type: none"> • Utilize the current model of averaging site visits (i.e., some providers might get 2 virtual and 1 onsite, and some might get 1 virtual and 2 onsite) 	<ul style="list-style-type: none"> • Complicated to manage for sponsor and state
<ul style="list-style-type: none"> • State to work with sponsor organizations to determine best practices 	<ul style="list-style-type: none"> • No real authority for sponsors to provide guidance

Questions for Deliberation

Thinking about your own state, sponsorship, and program how would a hybrid approach help or hinder your ability to plan, implement, and sustain policies that will ensure accurate and efficient processes?

With waivers in place for almost three years, some programs have already implemented hybrid monitoring policies and practices. What have you done, what works, what doesn't, what would you recommend based on your own experience?

Option 3:

All In-Person Required Monitoring Policies

(pre-pandemic rules, regulations, procedures)

- **Option Defined:** This option would mean every operational piece of monitoring would go back to pre-pandemic policies, procedures, rules and regulations.
- **Primary Drawback:** Not utilizing the forward progress and advancements in technology that we now know are available and which save money, time, and greenhouse emissions.

Ideas to Approach	Drawbacks
<ul style="list-style-type: none">• Give 18-to-24-month transition period waiver <p>USDA provided WIC with a waiver for states to opt into until September 30, 2026, in order to allow states to continue to offer remote services and learn from them.</p>	<ul style="list-style-type: none">• Not all states will apply for the waiver for a transition period creating inequities for the CACFP
<ul style="list-style-type: none">• States apply for their own individual waivers to approach visits in a way that is "different" from USDA guidance	<ul style="list-style-type: none">• Not all states will apply for the waiver for a transition period creating inequities for the CACFP
<ul style="list-style-type: none">• Identify components of the site visit that can be done at the desk to streamline the onsite visit	<ul style="list-style-type: none">• Sponsors of family child care homes and multistate sponsors still have to spend the time and money on travel three times a year
<ul style="list-style-type: none">• Any approach to requiring all in-person monitoring	<ul style="list-style-type: none">• Misses the opportunity to build on the innovation from the community during the COVID-19 Pandemic• Impedes access to the program for those who are hard to visit three times a year because of geographic location, staffing resources, and language access.

Questions for Deliberation

Thinking about your own state, sponsorship, and program, how would going back to pre-pandemic procedures help or hinder your program? For example, would it help set expectations for consistency with staff and providers? Or would the reintroduction of the travel hurt your budget to a point you would have to cut other expenses such as labor costs?

Thinking about your experience over the last three years, what innovation has been implemented that would be lost if the CACFP was required to do all in-person visits?

Appendix 1.

Example

Miles Traveled from Five Sponsors for Required Site Visits for CACFP in California in Fiscal Year 2018/2019

Sponsor	Miles Traveled by Car	Reimbursement	Number of Sites
1	84,722 miles	\$49,139	1,160 family child care homes
2	2,611 miles	\$1,514	38 child care centers
2	5,851 miles	\$3,394	140 family child care homes
3	80,132 miles	\$46,476	Unknown (family child care homes)
4	52,405 miles	\$30,396	914 family child care homes
5	10,782 miles	\$6,253	525 family child care homes