



POLICY BRIEF #6

PNAE **MONITORING AND CIVIL SOCIETY OVERSIGHT**





World Food Programme
Centre of Excellence
against Hunger

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INTRODUCTION

Brazil has one of the largest national school meal programmes in the world, serving hot meals daily to about 40 million students nationwide. Considering its area of over 8,000 km² and population of around 220 million citizens, operating and supervising the implementation of a programme that reaches all students in the country's public basic education system certainly presents challenges.

In this policy brief, we will see what centralised and decentralised tools the Brazilian government uses to monitor the National School Feeding Programme's implementation and accountability, including: School Feeding Councils, monitoring visits, digital monitoring, and data management tools.

THE BRAZILIAN NATIONAL SCHOOL FEEDING PROGRAMME

The Brazilian National School Feeding Programme (PNAE) offers school meals and food and nutrition education actions to students of all stages of public basic education. Its management is coordinated by the National Fund for Education Development (FNDE). FNDE is the central federal government agency responsible for standardising, supervising, and complementing the distribution of resources for food purchases.

The federal government transfers complementary financial resources to states, municipalities, and federal schools in 10 monthly instalments to cover 200 school days, according to the number of students enrolled in each school network. States, municipalities, and schools are responsible for the programme implementation. They cover the costs of infrastructure and human resources, in addition to leading local operationalisation.

PNAE MONITORING AND CIVIL SOCIETY OVERSIGHT

To assess whether the programme is being adequately implemented, the Brazilian government combines centralised and decentralised monitoring and civil society oversight strategies. PNAE is monitored and supervised directly by civil society through School Feeding Councils (Conselho de Alimentação Escolar - CAE) and institutionally through FNDE and by control bodies such as the Federal Court of Accounts (Tribunal de Contas da União - TCU), the Comptroller General of the Union (Controladoria Geral da União - CGU), and the Public Prosecutor's Office.

Monitoring focuses mainly in the adequate use of the programme's financial resources, but also involves the adequacy of menus, quality of meals, efficiency of local management, and compliance with central PNAE regulations. This includes, for example, compliance with national nutrition and school health guidelines, observance of the required minimum food purchases from smallholder farmers with federal resources, and civil society engagement in monitoring the programme.

Accountability for the use of public resources is a constitutional duty of public managers in Brazil. Local executors must prove that they have spent the resources they received (and their income from financial applications) in executing the programme in compliance with specific resolutions and with legislation that governs public administration expenditures. If this step is not fulfilled, the manager responsible for the municipality, state, or Federal District accounts will be held liable administratively or in civil or criminal courts. New transfers of the programme to this entity will also be suspended.



SCHOOL FEEDING COUNCILS AND E EPNAE

One of the most important oversight mechanisms of the PNAE is the School Feeding Council (CAE), a collegiate body of supervisory, permanent, deliberative, and advisory nature. Each state, municipality, and the Federal District has its own CAE. It is responsible for monitoring the quality of PNAE implementation in its jurisdiction. To this end, it oversees the use of state, municipal, or district public resources, as well as their complementation of all federal resources provided by the FNDE. In addition to supervising the programme's financial dimension, CAEs monitor various aspects of PNAE implementation throughout the school year. These aspects include the quality of food offered to students, hygienic-sanitary conditions in schools, and articulation with other programme actors such as smallholder farmers and local producers, for example.

Each CAE is composed of at least 7 full members and their alternates, totalling 14 members. They are representatives of the executive branch, students, parents of

students, education workers, and civil entities. The CAE composition is governed by Article 43 of resolution CD/FNDE No. 06/2020, which determines mandatory participation of at least:

I - One representative appointed by the executive branch of the respective federal entity

(e.g. state or district secretary of education);

II - Two representatives from entities of education workers and students, nominated by their respective representative bodies, chosen through a specific assembly for this purpose, recorded in minutes

(e.g. Teachers' Union, School Workers' Union, Student Academic Directories);

III - Two representatives of parents of students enrolled in the school to which the executing entity belongs (EEx), nominated by school councils, Parent-Teacher Associations or similar entities, chosen through a specific assembly for this purpose, recorded in minutes; and

IV - Two representatives appointed by organised civil society entities, chosen in a specific assembly for this purpose, recorded in minutes

(ex. the Federal District CAE currently has representatives who are members of the Brazilian Association of Celiacs, the Regional Council of Nutritionists, the Social Observatory of Brazil, the Observatory of Food and Nutrition Security Policies, and the Federal District Cooperative of Mixed Smallholder Agriculture).



The election of CAE members must follow democratic procedures through specific assemblies for this purpose. Therefore, the municipality, state or Federal District need to spread awareness of the renewal of the CAE's mandate and invite people who can contribute to school meals to participate in the process.

The CAE's mandate lasts for 4 years. The election of its members, president, and vice-president must happen by direct vote in a specific public assembly for this purpose, duly recorded in minutes for each election. Within 20 working days, the executing entity's manager must register the new CAE composition in the PNAE Management System (SIGPNAE), which favours the flow of member registrations and allows consultation and printing of the council's management reports.

In this system, the manager must inform general CAE data such as its place of operation and its telephone and e-mail. Then, it must register each member, attach supporting documents of the Council formation process (such as counsellor appointments, election minutes, and the letter of appointment for the executive branch representative. Based on the information

entered the system, FNDE analyses and validates the new CAE composition; if inconsistencies are identified, the CAE may be suspended, which results in interruption of the transfer of PNAE funds.

ePnae

To complement the CAE's work and enable the involvement of the school community, FNDE also provides the ePnae. It is a civil society oversight app in which parents, students, teachers, nutritionists, school feeding counsellors, and the entire community can monitor and evaluate meals served in public schools across the country. Within the app, users can browse his/her town's map and bookmark schools as desired. It is also possible to evaluate the food offered at a school and add comments/photos that justify the evaluation.

The app has data on the provision of accounts for school meals, information about schools, nutritionists, and local CAEs. The app can also be used as a communication channel between the local community and its CAEs and between the CAE and the federal executive power ombudsman system (to formalise a complaint in case of irregularities).



MONITORING VISITS AND *PNAE MONITORA*

Onsite monitoring of the PNAE by FNDE has a permanent regularity. Coverage is selected through sampling according to indicators of positive and negative programme management. These visits include data collection, information analysis and systematization, and verification of progress of execution. This aims to correct possible distortions, improve management, and subsidise its evaluation.

The PNAE Monitora app automates the FNDE's and CECANE's monitoring process. Technicians and agents rely on mobile digital

platforms such as tablets or cell phones to make the service faster, safer, and more standardised.

Information on compliance with legislation and on visited schools are immediately processed in the FNDE database, which speeds up consolidation. With this tool, monitoring agents have a roadmap to follow, organise schedules, save time, and gain productivity. A report is generated at the end of each visit, making it easier to identify and counteract execution failures.

ACCOUNTABILITY AND DATA INTEGRATION SYSTEMS

Due to the high volume of information generated by the programme, the Brazilian government uses centralised systems for accountability and integration of programme data. The Accountability Management System (SiGPC), for example, is a technological solution created to automate the stages of this process. Its scope includes verifying the obligation to provide accounts; inserting technical and financial execution data by the executing entities; verifying civil society oversight information; analysing information provided; adopting exception measures, when appropriate; and including information sent by control entities.

On the other hand, the Council Management System (SIGECON) aims to contemplate all necessary procedures so that CAEs can share their conclusive opinion on the PNAE accounts in their executing entities. The data presented by managers in the Accountability Management System can be accessed in SIGECON. Based on the advisors' analysis, managers must complete programme management monitoring through a questionnaire, and then on the subsequent note in the Conclusive Opinion. Only the chairperson of the School Feeding Council can access the SIGECON system.

The *PNAE card* is a tool created to enable greater agility in making payments for the programme's foodstuffs, but which also fulfils the function of increasing digital control over the allocation of resources. School managers receive a card linked to an account that is exclusive for federal programme funds, which allows automatic and direct settlement of expenses (in favour of the commercial establishment) and with identification of who receives the funds. Using the card also facilitates transparency in the use of resources, simplifying the issuance of recurring tax statements through digital means.

CECANES

In addition to directly implementing and facilitating the engagement of civil society and other supervisory entities in the PNAE monitoring process, FNDE also establishes partnerships with federal higher education institutions to develop research, teaching, and extension actions, thus forming the Centres of Collaboration for School Feeding and Nutrition (CECANEs). The CECANEs are reference and support units for developing actions and projects on the theme of school meals.

These centres provide technical and operational support for the implementation of healthy diets in schools. This includes training health and education professionals, nutritionists, cooks, school feeding counsellors, smallholder farmers, and other professionals involved in the implementation of PNAE. Its scope also includes research activities and evaluation of the programme at the local level, such as measuring students' health conditions, analysing the local food purchase process, and studying the municipal implementation of the programme.



CHALLENGES AND OPPORTUNITIES OF PNAE MONITORING AND CIVIL SOCIETY OVERSIGHT



Properly monitoring a universal policy such as PNAE presents constant challenges. One of them is building mechanisms for adequate and timely monitoring of its implementation throughout the national territory.

In this sense, the Brazilian experience highlights the relevance of aspects such as:

- 1 -** The Programme's civil society oversight, which allows society participation (especially from the school community) in the direct monitoring of school meals in every municipality in the country;
- 2 -** The development of communication systems to record information, publicity, and transparency of the programme's actions and its monitoring; and
- 3 -** The establishment of partnerships such as cooperation actions with federal institutes of higher education, which allow the development of training actions for actors involved; provision of technical assistance to executing entities; and monitoring the implementation of school meals in their territories of operation.

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