



## Ensuring Integrity in Non-Congregate Meal Service in the Summer Food Service Program

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### Legal Authority

SFSP 04-2026

### Program Requirements

It is critically important for the United States Department of Agriculture's (USDA) nutrition assistance programs to serve American taxpayers as efficiently and effectively as possible. On February 13, 2025, Secretary of Agriculture, Brooke Rollins, shared a letter to State, Tribal, Territory and Local Government Partners with her guiding principles for Food and Nutrition Administration (FNA) Nutrition Programs. Of these guiding principles, Secretary Rollins calls on us to ensure that these programs are executed with integrity and accountability. In the Summer Food Service Program's (SFSP) rural non-congregate meal service, program integrity efforts ensure resources are invested wisely to maximize the benefit for eligible children participating in the program. Recent high-profile fraud cases have demonstrated the urgent need for stronger safeguards to restore and maintain public confidence in Child Nutrition Programs. Although most program operators seek to comply with program rules in good faith, fraud—even when infrequent—undermines public confidence in government programs and jeopardizes their ability to serve the individuals who are in greatest need of assistance.

Accordingly, FNA is committed to supporting State agency efforts to combat fraud, waste, and abuse by further clarifying statutory, regulatory and administrative requirements through this guidance for the SFSP rural non-congregate meal service. State agencies should make every effort to increase oversight through the strategies outlined in the attachments to this memorandum. Each attachment emphasizes solutions for potential integrity concerns in the SFSP rural non-congregate meal service and provides guidance for developing state agency policies to prevent integrity issues and to better perform on-site monitoring. This guidance focuses on:

- Parent or guardian pick-up

- Site Caps
- Site Proximity
- Home Delivery

Thank you for your partnership and shared commitment to supporting robust program integrity efforts for the SFSP rural non-congregate meal service. By enhancing State agency oversight efforts at all touchpoints – from onboarding to monitoring and investigations – you are fulfilling your essential role in safeguarding the integrity of the program, maximizing the impact of taxpayer dollars, and protecting access to SFSP for participants.

Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should reach out to the appropriate FNA Regional Office with any questions regarding this letter or if you would like additional technical assistance.

**Note:** Guidance documents lack the force and effect of law, unless expressly authorized by statute or incorporated into a contract. USDA may not cite, use, or rely on any guidance that is not available through their guidance portal, except to establish historical facts.

## Comments

For questions concerning this memorandum, please contact the Policy Administrator at (404) 651-8193.

## Attachment A

### Guidance to Support Integrity in the Non-Congregate Summer Food Service Program: Parent or Guardian Pickup

In the Summer Food Service Program (SFSP), **parent or guardian pick-up** is a meal service option that allows approved sponsors to distribute meals to parents or guardians to take home to their children. Per [7 CFR 225.6\(c\)\(2\)\(xi\)](#) and [7 CFR 225.6\(c\)\(3\)\(viii\)](#), State agencies are responsible for ensuring sponsor applications include procedures that document how they will ensure meals are only distributed to eligible children and that duplicate meals are not distributed to any child in non-congregate areas.

State agencies are expected to develop policies for parent or guardian pick-up that prioritize safeguarding program funds for their intended use while being mindful of operational burden to sponsors. As a reminder, State agencies are responsible for defining “guardian” for the purpose of non-congregate meal service. The definition must maintain a direct caregiver relationship between an adult and a child. Individuals caring for groups of unrelated children formally enrolled in care should not be considered guardians under the State agency’s definition.

#### **Considerations for Developing State Agency Policies**

Verification of participant eligibility and preventing duplicate meals are two important integrity concerns for the parent or guardian pick-up option. During the application process, State agencies must confirm sponsor procedures ensure meals are distributed only to parents or guardians for eligible children. This could include requiring children to be present with a parent or guardian at the first meal pick-up. Sponsors, as a best practice, are expected to also request documentation from the parent or guardian picking up the meals, either before or during meal service. Such documentation may include:

- An official letter or email from a school confirming student enrollment
- Student ID cards,
- Individual student report cards,
- Attendance record from the parent portal of the school website, or
- Other official third-party records that confirm a child is eligible.

In addition to ensuring that meals are provided only to eligible children, sponsors must have effective procedures to prevent the issuance of duplicate meals, which may differ depending on site characteristics. Examples of procedures include:

- Requiring sign-in sheets for participants at the site and periodically cross-referencing them across sponsors with multiple sites in close proximity.
- Utilizing technology to capture meal service participation, like QR codes, an online

registration system, or other methods to electronically capture participation.

- Restricting meal service times to defined periods of time instead of permitting extended or all-day distribution times to ensure sponsors and State agencies can effectively monitor meal service times and conduct full reviews of the meal service.
- Requiring pre-registration and having names on rosters to confirm when meals are distributed.

## **On-Site Monitoring**

On-site monitoring can uncover compliance concerns regarding parent or guardian pick-up not captured in the application. If program deficiencies are found during monitoring visits, State agencies are expected to provide technical assistance, require corrective and fiscal action as needed, and then verify that the specified corrective action has been taken through a follow-up visit or some other manner. If a State agency determines that a sponsor does not have the capability to operate or oversee non-congregate meal services at their sites, then the State agency is expected to limit that sponsor's use of non-congregate meal service options as stated at [7 CFR 225.16\(i\)](#).

## **Indicators of Potential Integrity Issues**

**Multiple Pick-Up Locations at a Single Site:** Duplication of meals due to one site offering multiple locations for parent or guardian pick-up without additional integrity measures.

**Distributing Meals to Unapproved Adults:** Sponsors allowing sites to distribute meals to proxies for multiple children.

**Solely Using Hashmark Sheets:** Sites using meal count forms that only collect the number of meals served (e.g. hashmark sheets, tally sheets, or clickers) without additional methods to verify accurate eligible participation.

## Attachment B

### Guidance to Support Integrity in the Non-Congregate Summer Food Service Program: Site Caps

In the Summer Food Service Program (SFSP), an approved level of meals, also known as a “site cap”, is the maximum number of meals that may be claimed at a given site by an SFSP sponsor. Site caps are required to ensure that a site does not purchase and/or produce meals outside the capability of the site and the needs of the community. To maintain program integrity and ensure the site is meeting its intended purpose, site caps for rural non-congregate meal sites must accurately reflect the needs of the targeted rural communities being served.

State agencies are responsible for reviewing and approving site caps and should develop policies and procedures for assessing site caps for rural non-congregate meal service during the application process. States must confirm that the site cap reflects the number of eligible children residing in the targeted rural community.

To assess proposed site caps, State agencies can use population data resources found in the [Area Eligibility Mapper for CACFP and Summer Meals](#). School data and/or Census data also provides data for area eligibility and estimates regarding the population of children in a particular area. Previous guidance on site caps can be found at SFSP 16-2015, [Site Caps in the Summer Food Service Program: Revised](#), April 21, 2015, and at SFSP 09-2023, [Approved Level of Meals for Vended Sites in the Summer Food Service Program](#), May 31, 2023.

In situations where a sponsor proposed a non-congregate site located adjacent to a suburban or urban area, states must ensure that the purpose of such site is to serve children who live within the bounds of the rural area and that the site cap is reflective of serving those children.

### How to Assess Requests for Site Cap Increases

A sponsor may request a site cap increase if they feel the estimate provided as part of their application was too low. State agencies should establish a process for considering requests to increase site caps that ensures any increase aligns with the target population for the site. Below are methods and factors a State can consider when evaluating these requests. Please note, this is not an exhaustive list, and State agencies are not limited to the examples below.

- Utilizing datasets (like Census data or school data) and monitoring tools (on-site and off-site) to help assess whether a proposed increase is reasonable.
- Conducting meal service reviews to observe whether the proposed increase is justified.
- Considering the following questions when reviewing sponsor site cap requests:
- Is the rationale for the requested site increase reasonable?

- Is the site increase significant (i.e., more than a 5% increase)?
- Are other sites in the area serving a similar number of meals?
- Is the site increase justifiable based on the number of children that reside in the area?
- Has the site previously requested an increase?
- What is the target population of the site?
- Does the site intend to serve children who live within the bounds of the rural area and is the site cap reflective of serving those children?

## **On-Site Monitoring**

On-site monitoring can uncover concerns with compliance regarding site caps not captured in the application. If, during a monitoring visit, the State agency finds inconsistencies related to site caps that were previously approved, the State agency is expected to provide technical assistance to the sponsoring organization to ensure the site cap is corrected to accurately reflect the number of meals served to eligible children. The State should then verify that the specified corrective action has been taken through a follow-up visit or some other manner. If a State agency determines that a sponsor does not have the capability to operate or oversee non-congregate meal services at their sites, the State agency is expected to limit that sponsor's use of non-congregate meal service options as stated at [7 CFR 225.16\(i\)](#).

## **Indicators of Potential Integrity Issues**

**Proposed Site Caps Not Supported by Data:** When site information sheets propose site caps that far exceed Census or school data.

**Unreasonable Meal Counts:** When the site cap does not support the number of meals distributed.

## Attachment C

### Guidance to Support Integrity in the Non-Congregate Summer Food Service Program: Site Proximity

In the Summer Food Service Program (SFSP), site proximity refers to the minimum distance between approved sites, based on population density and accessibility to participants. Approval of multiple sites offering meal services at the same time to the same population of children can create potential integrity concerns. Site proximity must be considered when approving sites during the SFSP sponsor application process per [7 CFR 225.6\(h\)\(1\)\(ii\)](#).

#### **Considerations for Developing State Agency Policies**

State agencies should develop policies regarding site proximity for congregate and non-congregate sites. Each proposed site must be evaluated individually and thoroughly by the State agency, and in the context of other sites serving the area. Previous guidance on proximity of sites can be found in [SFSP 15-2023, Best Practices for Determining Proximity of Sites in the Summer Food Service Program, September 28, 2023](#).

State agencies should consider the following factors related to site proximity when reviewing applications:

#### ***The distance between all proposed sites and site location:***

- Consider population density and the ability for participants to access the sites based on geography.
- If two proposed sites are in close proximity, request documentation to explain the need:
  - Maximum distance someone might travel in a rural area.
  - Adjacent site types are closed-enrolled or camps.
- Ensure that sponsors operating sites in close proximity have a way to contact each other to prevent meal duplication or otherwise build in an obvious indicator of meal duplication, such as color-coding meal bags for different sites.
- Use mapping tools such as [Capacity Builder](#), Google maps, Apple maps, or MapQuest to confirm site proximity for proposed sites.
- In situations where a sponsor proposes a non-congregate site located adjacent to a suburban or urban area, ensure that the purpose of such site is to serve children who live within the bounds of the rural area and duplicate meals are not served.

#### ***The population to be served:***

- Require sponsors to provide detailed information on the population of children that will be served at each site.
- Generally, State agencies must ensure that the same population will not be served at more than one site. While it is allowable to approve meal sites in close proximity if they offer meals that attract different groups of children, any service institution may only serve two meals, or one meal and one snack, per child per day.
- Sites that appeal to specialized groups of children may include:
  - Specific age groups, such as when one site attracts primarily young children, while another site attracts primarily teens.
  - Children with special dietary requirements, such as kosher or halal meals.

***The meals that will be distributed:***

- In approving sites that are in close proximity, ensure the same population of children are not receiving more than the maximum allowable meals (for most sites, two meals or one meal and one snack per day).
  - For example, if one site proposes to distribute breakfasts and lunches and another site in close proximity proposes to distribute suppers and snacks, the State agency must consider whether the sites are, for practical purposes, operating as a single site to serve meals in excess of the maximum allowed per child for a single day.

***Meal service times:***

- Consider restricting meal service times to defined periods of time instead of permitting extended or all-day distribution times.
- Sites in close proximity that have the same or short meal service times could help prevent children traveling to multiple sites and receiving duplicate meals.
- In addition, this will help ensure that sponsors and State agencies can effectively monitor meal service times and conduct full reviews of the meal service.
- Require sponsors that operate an open non-congregate site near a closed-enrolled congregate site to schedule their meal service times to start and finish before the closed-enrolled site's meal service ends, to prevent meal duplication.

**On-Site Monitoring**

On-site monitoring can uncover compliance concerns regarding site proximity not captured in the application. If the State determines that a site is serving the same population of children that are already being served by another site in close proximity on a monitoring review, the State is expected to provide technical assistance, require any corrective and fiscal action as needed, and then verify that the specified corrective action has been taken through a follow-up visit or some other manner. This could include shutting down a site's operation, which is the expectation if there is believed to be any

intent of fraud by the sponsor, to preserve program integrity. If a State agency determines that a sponsor does not have the capability to operate or oversee non-congregate meal services at their sites, then the State agency is expected to limit that sponsor's use of non-congregate meal service options as stated at [7 CFR 225.16\(i\)](#) or deny their application to participate in the program.

## **Indicators of Potential Integrity Issues**

**Splitting Meal Service Between Sites:** Attempting to serve more than the maximum allowable meals per day split between neighboring sites. For example, one site serving breakfast and lunch with a neighboring site serving supper and snack.

**Open Site Types in Close Proximity:** Adjacent sites are both open and restricted open without physical conditions that limit access.

**Extended Meal Service Times:** Sites in close proximity requesting to operate extended meal service times.

## Attachment D

### **Guidance to Support Integrity in the Non-Congregate Summer Food Service Program: Monitoring Home Delivery**

State agencies overseeing the rural non-congregate option under the Summer Food Service Program (SFSP) must ensure that meals comply with Federal regulations and that sponsors maintain integrity over all meals served at sites, including those delivered directly to homes.

The individual homes on a non-congregate home delivery route are not considered individual sites. Rather, the entire route is considered one site. State agencies and sponsors are expected to leverage available resources to effectively monitor home delivery routes under the rural non-congregate option. This helps ensure eligible children in rural areas receive nutritious meals during the summer months.

#### **State Agency Home Delivery Monitoring Requirements**

Monitoring requirements of home delivery routes are similar to monitoring requirements for other rural non-congregate sites. State agencies must still establish which sites need pre-approval visits, such as those that did not participate in the program in the prior year, existing sites that are new to non-congregate meal service, and those that exhibited operational problems in the prior year.

During a sponsor review, the State agency is required to conduct reviews of at least 10 percent of each reviewed sponsor's sites, or one site, whichever number is greater. The review sample must include sites representative of all meal service models and meal distribution methods operated by the sponsor; this includes home delivery routes.

#### **Preparing for an On-site Review of Home Delivery**

Prior to conducting an on-site review of a sponsor's home delivery route, the State agency should:

- Ensure the sponsor has written parental consent for home delivery.
- Ensure that the entire home delivery route meets the definition of rural.
- Verify the days of operation and that the delivery route time match the State agency's approved meal service time.
  - For example, if the approved meal service time is from 8 a.m. -2 p.m., the first delivery would occur no earlier than 8 a.m. and the last delivery would occur no later than 2 p.m.
- Verify the approved meal distribution method (i.e., bulk distribution, unitized meals,

multi-day meal issuance).

- Verify the individual responsible for completing the point-of-service meal counts on the delivery route and ensure the sponsor has a record of their training for the current program year.
- Review tracking technology and/or photo evidence of meal deliveries, if available.

## **On-Site Monitoring**

Once the State agency has verified the information mentioned above and any additional information the State agency determines is necessary, the reviewer is ready to conduct the on-site review of food service operations. To effectively monitor the home delivery route, the reviewer should monitor the operation from start to finish, including observing the meals being loaded onto the delivery vehicle and ensuring meals are delivered and accounted for according to the sponsor's approved delivery plan. While on-site, the reviewer should monitor:

### ***Accurate meal claiming:***

- Ensure the individual completing the meal counts on the home delivery route is the same individual listed on the site information sheet previously verified during the desk review. If not the same individual, verify that they have a record of training for the current program year.
- Verify that the meals being delivered to the individual homes include all meal components required for a reimbursable meal.
- Verify that the number of meals being delivered is correct and claimed according to the meal distribution type (i.e. bulk distribution, unitized meals, multi-day meal issuance).

### ***Food safety:***

- Ensure the delivery vehicle has the appropriate holding equipment according to State or local health authorities.
- Verify that the meals are held at the proper holding temperature.
- Verify that the delivery vehicle has a temperature log, and it is completed accurately.

### ***Other considerations to note:***

- If the sponsor has previous documented integrity issues.
- Whether meals prepared by the sponsor or by a food service management company.
- How often deliveries occur and who is delivering the meals.
- If the sponsor has a process for participants that report they did not receive their delivery.
- If the sponsor has a process for reports of meal quality issues such as missing meal

components.

## **Indicators of Potential Integrity Issues**

**Missing Point-of-Service Meal Counts for Routes:** The sponsor does not have record of point-of-service meal counts for each day of meal service for a home delivery route.

**Missing Parental Consent Forms:** The sponsor does not have parental consent forms for all homes along the home delivery route.

**Returned Meals:** Meals are returned to the sponsor at the end of a route and being re-distributed after they had been held at improper temperatures.

**Missing Temperature Logs:** There is no record of temperature logs, or they are not completed according to local or State health, safety, and sanitation standards.