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DECAL: Nutrition Services Post-Public Health Emergency
Serving Meals to Children and Adults after the Novel Coronavirus (COVID-19) Public Health Emergency
Questions and Answers

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Collection of Race and Ethnicity Data

Program Requirements

The collection of racial and ethnic data information is integral to Program operations and, as per FNS Instruction 113-1, the collection of this information is still a requirement within the CACFP and SFSP. But as per FNS Policy Memorandum, [Questions and Answers Related to Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Rescission, June 13, 2022](#), operators may not use visual observation and identification as a method to collect the data. Obtaining the data from parents, guardians, or adult participants is the preferred method of data collection, as parents, guardians, and adult participants can provide accurate information. FNS does discourage asking a child directly to self-identify their race and ethnicity, as this practice may be confusing to young children.

CACFP institutions/facilities and SFSP sponsors must collect individual racial and ethnic information for participants who participate in Program meal services. Organizations that operate enrolled programs such as traditional childcare or adult care centers or SFSP closed enrolled sites may use DECAL's Income Eligibility Statement Forms (IES forms) to collect this information, as this form provides an area for adult participants, parents, and/or guardians to indicate the enrolled participant's race and ethnicity. DECAL's IES forms are located on Nutrition Services' website under [CACFP Forms](#) and/or [SFSP Forms](#).

However, not all CACFP or SFSP organizations operate enrolled programs or programs for which IES forms are required. Those operations include but are not limited to Head Start programs, CACFP At-Risk Afterschool Meals programs, SFSP open sites, and SFSP closed enrolled sites that meet the area eligibility requirement through census data and not through the collection of IES forms. To assist these types of organizations regarding data collection methods, DECAL has developed the CACFP/SFSP Racial and Ethnic Data Individual Collection Form for Families ("Individual Collection Form") that may be distributed to each parent and/or guardian to complete. The Individual Collection Form may be used by both CACFP and SFSP organizations and can be found on Nutrition Services' website under [CACFP Forms](#) and/or [SFSP Forms](#). CACFP and SFSP organizations may also develop and use their own form to collect racial and ethnic information for each of their participants. If the organization creates and uses its own form to collect the required data, the form must include the following options for the individual participant's parent and/or guardian to select:

- Ethnicity
 - Hispanic/Latino
 - Not Hispanic/Latino
- Parent and/or guardian may select one or more of the following racial identities:
 - American Indian or Alaskan Native
 - Asian
 - Black or African American
 - Native Hawaiian or Other Pacific Islander
 - White
 - Multiracial

In addition, the form must include the following advisement to parents and/or guardians:

"Use of the racial and ethnic data is to ensure compliance with USDA nondiscrimination requirements only. Providing this information is voluntary. Your response or lack of response will not impact the participant's eligibility for meals."

Q&As

I. Enrolled Programs

May enrolled program operators use enrollment documentation to capture racial and ethnic data from parents and guardians?

Yes. Enrolled program operators may use enrollment documentation to collect racial and ethnic information from parents and guardians rather than using a separate form or DECAL's [Racial and Ethnic Data Individual Collection Form](#). However, operators must ensure that all ethnic and racial categories are provided as an option for parents and guardians to select. These ethnic and racial categories are listed in DECAL's memo, [Collection of Race and Ethnicity Data in the Child and Adult Care Food Program and Summer Food Service Program](#). In addition, program operators should make parents and guardians aware that the use of ethnic and racial information is to ensure compliance with USDA nondiscrimination requirements, providing the racial and ethnic information is voluntary, and not providing a response will not impact the child's eligibility for meals.

If program operators distribute Income Eligibility Statements (IES) to collect racial and ethnic data and the participant and/or parent and/or guardian does not complete the racial and ethnic section on the IES, will this collection method meet requirements?

Yes. The requirement of collecting racial and ethnic data has been met if the program operator has attempted to collect racial and ethnic data using the IES form. Please note the IES form must be current and collected annually.

May enrolled program operators use electronic software, such as ChildPlus, to tabulate and/or house racial and ethnic data?

Yes. Enrolled programs may use electronic software to tabulate or house racial and ethnic data. However, operators must have a means of originally collecting the racial and ethnic data from parents and guardians. For enrolled operators that are not required to collect Income Eligibility Statements, such as Head Start programs, the operators may use DECAL's [Racial and Ethnic Data Individual Collection Form](#). Operators may also use their own form or enrollment documentation.

In addition, the electronic software should include all required ethnic and racial categories listed in DECAL's memo, [Collection of Race and Ethnicity Data in the Child and Adult Care Food Program and Summer Food Service Program](#), if the operator intends to use the racial and ethnic data housed in the electronic system to complete DECAL's required form, [Racial and Ethnic Data Collection Combined Form for Institutions and Sponsors](#).

If parents and guardians have access to an electronic software, parents and guardians may enter ethnic and racial responses within that system. However, operators must ensure that the system has all required ethnic and racial categories available for parents and guardians to select. In addition, program operators should make parents and guardians aware that the use of ethnic and racial information is to ensure compliance with USDA nondiscrimination requirements, providing the racial and ethnic information is voluntary, and not providing a response will not impact the child's eligibility for meals.

II. Non-enrolled Programs

What program types would be considered non-enrolled?

Non-enrolled refers to programs that do not require enrollment and typically do not collect enrollment documentation. For example, CACFP At-Risk Afterschool Meals Program operators and SFSP open sites

are examples of non-enrolled sites. Per FNS, program operators of sites that do not require enrollment (non-enrolled sites) should choose data collection methods that are easy for adult participants, parents, and guardians to use; and must advise adult participants, parents and guardians that the supplying of racial and ethnic information is voluntary, and not providing a response will not impact the child's eligibility for meals.

If a Program operator distributes individual racial and ethnic data collection forms to participants and/or parents/guardians of non-enrolled programs (SFSP; CACFP At-Risk) and does not receive any returned information, what documentation may be used to support the attempt to collect racial and ethnic data?

Program operators may maintain and display the blank individual racial and ethnic data collection form that was distributed to participants and/or parents/guardians to support the requirement of collecting racial and ethnic data. In addition, the Combined Racial & Ethnic Data Collection Form includes a fill-in field where operators can include the number of unknown responses. Please keep in mind that the Combined Racial & Ethnic Data Collection Form must be completed with available & applicable information, signed, dated for each site, and provided upon DECAL request.

Can SFAs and non-SFAs use aggregate data prior to attempting to collect racial and ethnic data for individual children?

No. Aggregate racial and ethnic data information may be used as an alternative data collection method by non-enrolled programs only under certain circumstances. SFSP and CACFP non-enrolled programs may use aggregate data if fewer than 50% of participants provide race and ethnicity data. For both SFSP and CACFP, this percentage would be calculated based upon a consecutive 5-day average of attendance. If a non-enrolled program was to operate for less than 5 days, an average attendance would be taken from all the days of operation. For more information regarding the use of aggregate data please see DECAL Memorandum [Collection of Race and Ethnicity Data in the Child and Adult Care Food Program and Summer Food Service Program](#).

III. Both Enrolled and Non-enrolled Programs

How often must racial and ethnic data be collected?

[FNS 113-1, Civil Rights Compliance and Enforcement – Nutrition Programs and Activities](#) requires program operators to collect data yearly. This applies to both enrolled and non-enrolled programs, with the exception of SFSP camp sites. Each camp site must collect racial and ethnic data for participants per each individual camp session. As a best practice, DECAL encourages CACFP operators to begin collecting racial and ethnic data at least 30 days ahead of the expiration of the last completed Combined Racial/Ethnic Data Collection Form. SFSP sponsors should consider beginning the collection of racial and ethnic data within the first few weeks of a site's operation or setting a goal to complete the collection process within 30 days after meal services begin. Please reference the memo, [Collection of Race and Ethnicity Data in the Child and Adult Care Food Program and Summer Food Service Program..](#)

Are Program operators allowed to collect racial and ethnic data in multiple ways, i.e., verbally, and individual collection forms?

Yes. Program operations may use a combination of collection methods and select all applicable methods of collection racial and ethnic data on DECAL's [Combined Racial and Ethnic Data Collection Form](#). Please note, only non-enrolled programs may use aggregate data and only when they meet the less than 50% rule.

Regarding requesting information verbally, operators must be mindful that requesting racial and ethnic information verbally may be uncomfortable for staff and for participants and participants' parents

and/or guardians. Respect for individual dignity should guide the processes and methods for collecting data on race and ethnicity. Ideally, respondent self-identification should be facilitated to the greatest extent possible.

Where should the Racial Ethnic Data Collection Combined Form for Institutions and Sponsors be maintained?

For sponsoring organizations (enrolled and non-enrolled programs), the Racial Ethnic Data Collection Combined Form should be maintained for each sponsored site at the sponsor’s office. In addition, the form should be maintained at the meal service delivery location (site location). All documentation related to the collection of racial and ethnic information must be maintained and provided upon DECAL request.

**For additional guidance, please reference policy memoranda, [Questions and Answers Related to Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Rescission dated June 13, 2022](#) and [Collection of Race and Ethnicity Data in the Child and Adult Care Food Program and Summer Food Service Program](#)

SFSP Rural Non-congregate Meal Service

Program Requirements

As per USDA guidance, in order for a meal service site to be eligible and approved for rural non-congregate meal service flexibilities, the site's location must meet the following criteria:

- Criteria 1: The site must be located in an area designated as 'rural'; and
- Criteria 2: The site must be located where there is no congregate meal service available to SFSP participants.

Q&As

I. State Agency Approval of Non-congregate Meal Service

Where can a sponsor provide non-congregate meals?

Sponsors can provide non-congregate summer meals in rural areas that do not have congregate meal service. If the rural area meets the definition of an ‘area in which poor economic conditions exist’ (per Program regulations at 7 CFR 225.2), then meals for all children may be claimed for reimbursement. If the rural area does not meet the definition of an ‘area in which poor economic conditions exist,’ only the meals served to children who are eligible for free or reduced-price meals under the National School Lunch Program (NSLP) or the School Breakfast Program (SBP) may be claimed.

Can SFAs operating SSO provide a non-congregate meal service?

Yes. SFAs operating the NSLP Seamless Summer Option (SSO) may provide non-congregate meal service as described in this guidance. Non-congregate meals served under the SSO are reimbursed at the “free” rates prescribed by the Department of Agriculture (USDA) for school meals and snacks served through NSLP and SBP. If suppers are provided, they would be reimbursed at the NSLP free rate for lunches.

If an area is not rural on the FNS Rural Designation Map, does that mean it is not eligible for non-congregate meal service?

The area may still be eligible if it is a rural pocket within a larger area designated as urban on the map. When a site is located in a rural pocket, the State agency must consult with the appropriate FNS Regional

Office (FNSRO) and seek concurrence to designate the site as rural. The State agency must inform the FNSRO that the site is located in a rural pocket but is not required to submit additional data for review.

For more information on rural designations in the SFSP, please refer to policy memorandum SFSP 04-2015, *Rural Designations in the Summer Food Service Program*, April 21, 2015, at <https://www.fns.usda.gov/sfsp/rural-designations-summer-food-service-program>.

Can non-congregate meals be provided in non-rural areas if Program access is limited because of lack of transportation, safety concerns, lack of a location to serve meals, or other similar reasons?

No. Non-congregate meal service is only allowed in rural areas where no congregate meal service is available. State agencies and sponsors should work together to determine how best to leverage community resources to provide a congregate meal service that meets the needs of children in non-rural areas.

May a non-congregate site operate in close proximity to a congregate site that is closed enrolled or a camp?

Under some circumstances, yes. Non-congregate meal service can potentially be provided by sites that are in close proximity to congregate service sites, such as camps or closed enrolled sites. However, State agencies must ensure that the congregate and non-congregate sites will not serve the same population of children for the same meal service on the same day.

Can existing rural sites switch from congregate to non-congregate meal service?

Yes. However, the non-congregate option is not intended to replace congregate meal service. USDA understands the benefits of congregate meal service and often the accompanying activities and encourages sponsors to continue to provide these opportunities when feasible. When planning for non-congregate meal service, State agencies and sponsors should work to identify and prioritize those rural areas that the congregate SFSP cannot reliably reach.

May a sponsor choose to solely operate non-congregate meal service?

Yes, with State agency approval.

May a state agency prohibit a sponsor from operating a non-congregate meal service?

State agencies may not deny a sponsor application based solely on the sponsor's intent to provide a non-congregate meal service. However, State agencies determine whether individual sponsors are capable of providing non-congregate meal service in rural areas, in line with SFSP requirements. State agencies have the responsibility to deny sponsors that they determine:

- Are not financially and administratively capable of operating a non-congregate meal service.
- Proposed one or more service areas already sufficiently served through a congregate meal service; or
- Proposed one or more service areas that do not meet the requirements for non-congregate meal service.

If the State agency denies a sponsor's non-congregate meal service, it must notify the sponsor of its right to appeal under Program regulations at 7 CFR 225.13. FNS encourages State agencies to consult with their FNS Regional Office if they need support in evaluating whether a sponsor must be denied.

If sponsors offer non-congregate meal service in rural areas, are they still required to follow existing SFSP program requirements?

Yes. All SFSP program requirements in regulations (7 CFR 225) and other related regulations and instructions apply to both congregate and non-congregate meal service, unless otherwise specified in this memorandum.

May rural sites that offered congregate meal service in prior summers be approved by the State agency to operate non-congregate meal service in Summer 2023?

Yes. While FNS supports the benefits of congregate meal service and the enrichment activities that are often offered in conjunction with meals, non-congregate meal service may be appropriate and preferable in some situations. For example, a previous congregate site may be able to serve more children through a non-congregate model. FNS encourages State agencies to consider the specific circumstances of the sponsor and site when reviewing requests for non-congregate meal service and to approve all such requests that meet program eligibility requirements.

Is it ok for some of our sites to do congregate feeding and some to do non-congregate as long as the non-congregate is over a quarter mile away from the congregate?

Yes, it is ok for a sponsor to operate sites that offer congregate meal services and other sites that offer non-congregate meal services (if approved by DECAL to do so). However, the criteria for approval remain the same for these sponsors as far as rural non-congregate meal services, the site must be in an area designated as rural and must be located where there is no congregate meal service available to SFSP participants. To determine if there is no congregate meal service available, DECAL will first review the site's location with regards to its proximity to any other approved SFSP meal service site. DECAL will determine if there is another approved SFSP site within ¼ mile of the proposed non-congregate site. If there is indeed a site nearby, DECAL will determine if the nearby site will be providing congregate meals.

However, if the nearby site is a closed enrolled site, a camp, or has barriers that would prevent participants from accessing those congregate meals (e.g., participants would have to cross a busy highway to access congregate meal site), then the proposed site may be approved for non-congregate meal service. If it is found that the proposed site is within an area for which participants do have access to congregate meals, the sponsor's request to participate in non-congregate flexibilities will be denied.

II. Sponsor, Site, and Participant Eligibility

Who is eligible to participate as a sponsor operating a non-congregate meal service?

Any service institution that meets the definition of sponsor in Program regulations ([7 CFR 225.2](#)), with the exception of public and private nonprofit day camps and residential summer camps, is eligible to apply to operate non-congregate meal service through their SFSP State agency. This includes:

- Public and private nonprofit school food authorities;
- Units of local, municipal, county or State government;
- Tribal Governments; and
- Private, nonprofit organizations.

What sources of data can the State agency use to establish area eligibility?

State agencies can use any of the data sources outlined in policy memorandum [SFSP 03-2017: Area Eligibility in Child Nutrition Programs](#) to verify that sites are located in an eligible area. Data sources include school, census, or other approved sources of data that indicate that 50 percent of the children in the site's area are eligible for free or reduced-price school meals.

What sources of data are used to determine eligibility for receiving non-congregate meals in non-area eligible areas?

Individual eligibility for free or reduced-price school meals may be determined by using individual eligibility determinations through school data or by the application process described in Program regulations (7 CFR 225.15(f)). Only meals served to children eligible for free or reduced-price school meals may be claimed for reimbursement for non-congregate meals.

Are camps eligible to offer a non-congregate meal service?

Camps cannot offer non-congregate meal service if congregate meal service is available. As defined in 7 CFR 225.2, camps must provide a regularly scheduled food service as part of an organized program for enrolled children; such programming is generally understood to be congregate in nature.

Can a site provide a combination of non-congregate and congregate meal services?

Yes. Non-congregate meal service may be provided when congregate meal service is not available.

For example:

- A site that only offers breakfast through a congregate meal service may be approved to provide a lunch through non-congregate meal service.
- A congregate site that serves lunch and breakfast three days a week may be approved to provide non-congregate meals for days with no congregate service, including weekends.
A congregate site that operates in the month of July, may be approved to provide non-congregate meals for the ten-day period following their last congregate meal service day (provided that the ten days are included in the site's approved service period).

Does a sponsor need to be in 'good standing' to operate a non-congregate meal service?

Yes. In order to participate, experienced sponsors must be considered in 'good standing' under the Child Nutrition Program(s) which they currently operate. Sponsors that have experienced serious deficiencies in prior years may be approved to operate non-congregate meal service if, to the satisfaction of the State agency, *all* appropriate corrective actions to prevent recurrence of the deficiencies have been taken as outlined in 7 CFR 225.6(b)(9).

Are new sponsors allowed to operate a non-congregate meal service?

Yes, new sponsors may be allowed to operate a rural non-congregate meal service with State agency approval.

Are Tribal governments eligible to provide a non-congregate meal service as a sponsoring organization?

Yes. Tribal governments and authorities interested in operating a non-congregate meal service are encouraged to work with State agencies administering the SFSP to determine where and how non-congregate meal service can best operate. For more detailed information on Tribal eligibility, please refer to the policy memorandum CACFP 18-2012, SFSP 14-2012: Tribal Participation in the CACFP and the SFSP, published July 14, 2012, at <https://www.fns.usda.gov/cn/tribal-participation-cacfp-and-sfsp>.

Is the rural non-congregate meal service option available during unanticipated school closures?

Yes. The rural non-congregate meal service authorized in the Consolidated Appropriations Act, 2023 ([P.L. 117-328](#)), may be available for non-congregate meal service in *rural* areas during the school year when there is an unanticipated school closure related to natural disasters, unscheduled major building repairs, court orders relating to school safety or other issues, labor-management disputes, or similar unanticipated causes with State agency approval. All unanticipated school closure flexibilities available to sponsors outlined in 7 CFR 225 remain in effect for sponsors operating rural non-congregate meal service

during unanticipated school closures. In addition, the State agency must continue to use the priority system when approving sponsors to operate sites that propose to serve the same area, or the same enrolled children as outlined in 7 CFR 225.6(b)(5).

Please note, only sponsors that meet these requirements and are approved to offer non-congregate meal service as authorized in the Act may be approved by their state agency to operate non-congregate meal service without a waiver during the school year when an unanticipated school closure occurs. In all other circumstances, State agencies must continue to rely on the established National School Lunch Act Section 12(l) waiver process to allow non-congregate meal service for sponsors experiencing an unanticipated school closure as outlined above.

What data sources can State agencies use to help identify rural pockets within a Metropolitan Statistical Area (MSA)?

States may use the following for identifying a rural pocket within a Metropolitan Statistical Area (MSA). States may submit rural pocket concurrence requests to their Regional Office to receive an *expedited* review using the below dataset.

States may use the Rural-Urban Commuting Area (RUCA) Codes 4 through 10 as a baseline for identifying a rural pocket within a Metropolitan Statistical Area (MSA). The RUCA codes were first developed by USDA Economic Research Service (ERS) and the Federal Office of Rural Health Policy in collaboration with the WWAMI Rural Health Research Center to provide a detailed and flexible approach to delineating sub-county components of rural and urban areas. These codes are based on the same assumptions used by the Office of Management and Budget (OMB) to define county-level metropolitan and micropolitan areas. In total there are 10 codes, which offer a straightforward classification of metropolitan and nonmetropolitan areas based on the size and direction of primary commuting flows. Other Federal Agencies, including USDA's Rural Development agency, use the RUCA codes to assess rurality, and it is generally accepted that non-metro areas and census tracts in MSAs designated with codes 4 through 10 may be considered 'rural.' More information on the RUCA codes and classifications can be found on ERS' website: <https://www.ers.usda.gov/data-products/rural-urban-commuting-area-codes/>.

Are other data sources besides RUCA allowable?

FNS may consider other data sources to make a determination of whether an area is 'geographically isolated from urban areas' on a case-by-case basis. States should continue to work with their Regional Office to identify rural pockets and obtain concurrence. It may be that county level measures such as those listed below reflect rural pockets that are not already identified by RUCA codes. States may also consider these codes for their geographically isolated assessment.

- Rural-Urban Continuum Codes (RUCC) 4 through 9. Developed by Economic Research Service (ERS), the 2013 Rural-Urban Continuum Codes form a classification approach that distinguishes metropolitan counties by the population size of their metro area, and nonmetropolitan counties by degree of urbanization and adjacency to a metro area. The official OMB metro and nonmetro categories have been subdivided into three metro and six nonmetro categories. Each county in the U.S., municipio in Puerto Rico, and Census Bureau-designated county-equivalent area of the Virgin Islands/other inhabited island territories of the U.S. is assigned one of the 9 codes.
- Urban Influence Codes (UIC) 3 through 12. The UIC were developed by ERS to capture differences in economic opportunities among counties. The UIC are based on OMB's delineation of Metropolitan (metro) and Micropolitan (micro) statistical areas; micropolitan areas are further classified by

adjacency and noncore nonmetro counties are classified by adjacency and population of the county's largest town.

Additional resources that may be used.

- NCES Locale Classifications issued by the National Center of Education Statistics (NCES)*. For locations that fall under NCES Locale Classifications 41, 42, and 43 may be designated as areas located within 'rural pockets'.
- No Kid Hungry Non-Congregate Summer Meals Rural Eligibility Map

***The RUCA and NCES will be used as DECAL's primary resources. Should a site not qualify as rural using RUCA and NCES, DECAL will refer to the three remaining resources.**

In addition, similar to existing area eligibility policy for sites serving American Indian and Alaska Native children¹, State agencies may permit rural pocket designation for proposed site(s) located on a Tribal reservation, on trust land, or in an Alaska Native village by submitting documentation from a Tribal authority which certifies that the proposed site is located in a rural pocket. These designations must be submitted to the FNS Regional Office but will receive *expedited* review for Regional Office concurrence. This policy supports the expansion of access to SFSP and SSO to American Indian and Alaska Native children.

Do sponsors enter the rural non-congregate meal sites into GA ATLAS the same as rural congregate meals?

For rural non-congregate meal sites using child pick-up or parent/guardian pickup, separate Site Applications would be required just as with sites that operate congregate meal services.

If operating home delivery, as per USDA guidance, Questions and Answers #2: Summer 2023 Non-Congregate Meal Service in Rural Areas, Implementation Guidance: Summer 2023 Non-Congregate Meal Service in Rural Areas, and DECAL's Rural Non-Congregate Meal Services in the Summer Food Service Program, Site Applications would still need to be submitted; however, each individual home would not be required to have separate Site Applications. The home delivery route, as a whole, would be considered the 'site' for the purposes of site requirements and the Site Application in ATLAS. During the application process, sponsors opting to use home delivery must provide delivery schedules with meal delivery address locations.

Will sites located in unserved/underserved counties identified by DECAL Nutrition Services qualify for rural non-congregate meal service option, even if the FNS' Rural Designation Map indicates that the site is not in a rural area and the site does not meet the definition of a 'rural pocket'?

FNS may consider other data sources to make a determination of whether an area is 'geographically isolated from urban areas' on a case-by-case basis. States should continue to work with their Regional Office to identify rural pockets and obtain concurrence. It may be that county level measures such as those listed below reflect rural pockets that are not already identified by RUCA codes. States may also consider these codes for their geographically isolated assessment.

- Rural-Urban Continuum Codes (RUCC) 4 through 9. Developed by Economic Research Service (ERS), the 2013 Rural-Urban Continuum Codes form a classification approach that distinguishes metropolitan counties by the population size of their metro area, and nonmetropolitan counties by degree of urbanization and adjacency to a metro area. The official OMB metro and nonmetro

categories have been subdivided into three metro and six nonmetro categories. Each county in the U.S., municipio in Puerto Rico, and Census Bureau-designated county-equivalent area of the Virgin Islands/other inhabited island territories of the U.S. is assigned one of the 9 codes.

- Urban Influence Codes (UIC) 3 through 12. The UIC were developed by ERS to capture differences in economic opportunities among counties. The UIC are based on OMB's delineation of Metropolitan (metro) and Micropolitan (micro) statistical areas; micropolitan areas are further classified by adjacency and noncore nonmetro counties are classified by adjacency and population of the county's largest town.

Additional resources that may be used.

- NCES Locale Classifications issued by the National Center of Education Statistics (NCES)*. For locations that fall under NCES Locale Classifications 41, 42, and 43 may be designated as areas located within 'rural pockets'.
- No Kid Hungry Non-Congregate Summer Meals Rural Eligibility Map

***The RUCA and NCES will be used as DECAL's primary resources. Should a site not qualify as rural using RUCA and NCES, DECAL will refer to the three remaining resources.**

In addition, similar to existing area eligibility policy for sites serving American Indian and Alaska Native children², State agencies may permit rural pocket designation for proposed site(s) located on a Tribal reservation, on trust land, or in an Alaska Native village by submitting documentation from a Tribal authority which certifies that the proposed site is located in a rural pocket. These designations must be submitted to the FNS Regional Office but will receive *expedited* review for Regional Office concurrence. This policy supports the expansion of access to SFSP and SSO to American Indian and Alaska Native children.

What are some allowable ways to combine rural non-congregate meal services with Congregate meal service?

The below examples apply to either:

- One site operating both congregate and rural non-congregate meal service; or
- Two sites in the same area – one providing congregate meal service and the other providing rural non-congregate meal service.

Example #1 – Sites serving the same children on different days.

- Congregate breakfast and lunch Monday-Friday
- Rural non-congregate meal service for breakfast and lunch for Saturday and Sunday

Example #2 – Sites serving the same children on different weeks

- Camp ends July 28
- School starts August 9
- Sponsor offers weekday rural non-congregate meal service for breakfast and lunch through August 8

Example #3 – Sites serving the same children for different meals on the same day

- Congregate breakfast, take home lunch, supper, or snack; or
- Congregate lunch, take home breakfast or snack

Please see [Rural Non-Congregate Meal Service Examples: Summer 2023](#) for further guidance.

What are some unallowable ways to combine rural non-congregate meal services with Congregate meal service?

The below examples apply to either:

- One site operating both congregate and rural non-congregate meal service; or
- Two sites in the same area – one providing congregate meal service and the other providing rural non-congregate meal service.

Example #1 – Congregate breakfast and lunch, rural non-congregate meal service snack provided to take home. This example would be unallowable as the sponsor exceeded the daily meal allowance (2 meals) per child.

Example #2 – Congregate meal service for breakfast and lunch Monday-Friday, non-congregate meal pick-up Monday-Friday for breakfast and lunch at the same site as congregate meal service. This example would be unallowable as the rural non-congregate meal service cannot be provided if congregate meal service is available.

III. Meal Service Models

What models of non-congregate meal service are allowed?

Home delivery and meal pick-up options may be used for summer 2023; in many cases, non-congregate meal service may look very similar to non-congregate service implemented during the COVID-19 public health emergency, which can serve as a reference point. State agencies opting to use these models must ensure that sponsors are able to maintain accountability and program integrity.

- Home Delivery:
This non-congregate meal service model is designed to deliver meals directly to homes. Delivery could be completed by mail or delivery service or could be hand-delivered by the sponsor’s staff, volunteers, or others.
- Meal Pickup:
This non-congregate meal service model is designed to provide packaged meals that are taken home for children to eat later. Examples of meal pickup include “grab and go,” curbside service, or take-home backpacks. Meal pickup is available to all children when the pick-up site is in an area-eligible area, or to children who are eligible for free or reduced-price school meals when the pick-up site is in an area that is not area-eligible. Meals must be packaged and portioned to allow children to carry the food from the SFSP site to their home.

Food safety is important for all meal service models. Sponsors should ensure food selections and packaging promote food safety; sponsors should also include instructions on at-home storage and preparation. As with congregate SFSP meal service, sponsors must ensure non-congregate meal packages meet State and local health and safety requirements.

How is the home delivery model for non-congregate meal service different from the mobile meal model operated by some summer sponsors during the past several years?

Under the home delivery model for rural non-congregate meal service, SFSP site requirements do not apply since individual homes are not considered sites. The mobile meal model follows the definition of “site” outlined in 7 CFR 225.2. The mobile meal model is a type of congregate service that involves a sponsor delivering meals to an area, using a route with stops at approved sites in the community. The meal service is supervised, and all meals are consumed at the site, on the bus, or near the drop-off location as outlined in SP 02-2014, SFSP 02-2014: Mobile Feeding Options in Summer Feeding Programs.

How can a non-SFA sponsor identify eligible children in a non-area eligible area?

A non-SFA sponsor may use the household application procedures outlined in 7 CFR 225.15(f) to identify eligible children in non-area eligible areas and/or to obtain household information for participation. A non-SFA sponsor that wants to use NSLP/SBP student data to identify eligible children in non-area eligible areas and/or for participation in the home delivery model must have a Memorandum of Understanding (MOU) with an SFA to use the student data for those purposes. Sponsors are responsible for the proper handling and storage of student data with applicable SFAs in accordance with confidentiality and disclosure provisions in the National School Lunch Act and SFSP regulations (7 CFR 225.15(f)(1)).

What are the requirements for initiating home meal delivery for a household?

Sponsors eligible to initiate home meal delivery are SFAs or non-SFAs with a Memorandum of Understanding (MOU) with an SFA to use the SFA's student data as the basis for establishing their eligible population or sponsors that collect Income Eligibility Statements (IESs). Sponsors that are approved to provide a non-congregate meal service using the home delivery model must be able to identify and invite households of eligible children to participate in the meal delivery service and obtain written consent from the eligible child's parent or guardian that the household wants to receive delivered meals. Written consent could include hard copy, email, or other electronic means of communication. In addition, sponsors must confirm the household's current contact information and the number of eligible children in the household to ensure the correct number of meals are delivered to the correct location. Finally, sponsors must protect the confidentiality of participants and their households throughout the process in accordance with confidentiality and disclosure provisions in the National School Lunch Act and SFSP regulations (7 CFR 225.15(f)-(1)). Part 5 of the *Eligibility Manual for School Meals*, provides specific guidance on applying the statutory and regulatory requirements, and is available online at: <https://www.fns.usda.gov/cn/eligibility-manual-school-meals>. State agencies and sponsors may also refer to the policy memorandum, [SP16 CACFP06 SFSP10-2016: Disclosure Requirements for the Child Nutrition Programs](#) for more information. Sponsors that are not SFAs must have MOUs on the proper handling and storage of student data with applicable SFAs that ensure consistency with the above stated confidentiality requirements. SFAs are not required to agree to enter into MOUs with requesting non-SFA sponsors. If sponsors do not obtain eligibility data from an SFA, sponsors must collect IESs to establish participant eligibility.

Do sponsors need signed consent forms from parents/guardians before non-congregate meals are provided to children?

Yes, consent forms are required for the home delivery model. The sponsor may provide its own consent form, or the State agency may provide a consent form for sponsors and sites to use. For other non-congregate models, i.e., grab and go, the standard SFSP public notification requirements are all that is needed.

Do home-delivered meals need to be shelf-stable?

Not necessarily. The type of meal offered will depend on the resources and capacity of the site. With State agency discretion, sponsors that are able to prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets State or local food safety requirements may do so if participating households are also able to accept and safely store the meals. Sponsors should consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires cold storage or further preparation, such as reheating. The meals must also meet the SFSP or SSO meal pattern requirements.

Does the child need to be present for home meal delivery?

No. The child does not need to be present at the time of delivery, as long as the sponsor has obtained the household's written consent to deliver meals and has verified the current address. If the meals are shelf-stable, no one need be present, as long as the address has been verified. Sponsors should consider state and local food safety requirements and best practices when designing their meal service.

Is additional funding available for meal delivery?

No. There is no additional federal reimbursement for home delivery or mobile meal delivery. However, expenses related to meal delivery, such as postage or delivery service fees, would be considered an allowable cost under the SFSP or SSO. Delivery costs could also be paid with non-program funds such as State or local funds, or private donations. Standard reimbursement rates for SFSP (<https://www.fns.usda.gov/sfsp/fr-010623>) and SSO (<https://www.fns.usda.gov/cn/fr-072622>) remain in effect.

Does the person delivering the meals to the home need to hand each child a bag or can the adult take all the meals into the home?

No, home delivered meals do not need to be handed only to children. Per Federal guidance, a child does not even need to be present at the time of delivery, as long as the sponsor has obtained the household's written consent to deliver meals and has verified the current address. If the meals are shelf-stable, no one needs to be present, as long as the address has been verified.

The home delivery model is defined by Federal guidance as a *non-congregate meal service model designed to deliver meals directly to homes. Delivery could be completed by mail or delivery service or could be hand-delivered by sponsor's staff, volunteers, or others.* Based on this description, meals don't have to be directly handed to each child.

Would the SFSP employee or volunteer ever need to enter the home for a home delivery?

There's nothing in Federal guidance that advises that a sponsor's staff member would be required to enter a home during home delivery.

What is the difference between bulk items and multi-day meal issuance, and how do they relate to unitized meals?

For clarification purposes, FNS will refer to *bulk items* in the non-congregate meal service as specific food items provided in a larger quantity than required for a single meal service. For example, a loaf of bread and a package of luncheon meat may be distributed as bulk items instead of being pre-assembled into individual sandwiches. A unitized meal is a meal that is individually portioned, packaged, and served as a unit; beverages such as milk or juice may be packaged separately, but served with the unitized meal. FNS will refer to *multi-day meal issuance* in the non-congregate meal service when multiple days of meals are provided on one day, whether unitized or comprised of bulk items. For example, a sponsor may provide 5 days of meals every Monday. Unitized meals served in this fashion would be provided in five distinctly packaged units or sets of menu items. Bulk items, while not unitized in this fashion, must still be able to be portioned into specific quantities in line with the applicable meal pattern requirements, to preserve the quality of the intended menu items and/or meals.

Can sponsors distribute multiple days' worth of meals to help over the weekends?

Yes, but the distribution must only be conducted for the allowable number of reimbursable meals for up to a 10-calendar day period. The 10-calendar period would include weekend days. Sponsors who opt to conduct multi-day distribution must submit and attach delivery schedules within the sponsor's application during the application process.

For multi-day documentation purposes, sponsors are required to use DECAL's Daily Meal Count Form (Att. 18) or Daily Meal Count Form (Att. 18A, *for mobile feeding only*) to record the number of meals served. Each day's meals that were served and included in the multi-day distribution should be recorded on a separate Daily Meal Count Form. A separate Daily Meal Count form must also be used for each meal type served (e.g., breakfast and lunch). Sponsors may use an alternate meal count form but only with prior approval from DECAL. Requests to use alternate forms must be submitted to the sponsor's assigned Technical Assistance Coordinator. Use of alternate forms without DECAL's approval could result in a meal reclaim or disallowed costs for the period covered by the records at issue. The Alternate Approval Letter and the alternate forms must be maintained on file and made available upon request. Please see [DECAL SFSP Policy #5, Recordkeeping Requirements for All Sponsors and Sponsored Facilities Participating in the SFSP](#) for additional information on the use of alternate forms.

If a sponsor is closed for holidays (for example July 4th), can multiple days' worth of meals be distributed on the day before the closing or holiday (for example June 30th) to help compensate for no meals being provided on the scheduled holidays or closings? If so, will instructions be provided on how to indicate this in the GA ATLAS Site Application?

Yes, but the distribution must only be conducted for the allowable number of reimbursable meals for up to a 10-calendar day period. The 10-calendar period would include weekend days. Sponsors who opt to conduct multi-day distribution must submit and attach delivery schedules within the sponsor's application during the application process.

The Application Unit will gather the information regarding the number of days for which the meals will be distributed and record that information for DECAL review and reporting purposes.

For multi-day documentation purposes, sponsors are required to use DECAL's Daily Meal Count Form (Att. 18) or Daily Meal Count Form (Att. 18A, *for mobile feeding only*) to record the number of meals served. Each day's meals that were served and included in the multi-day distribution should be recorded on a separate Daily Meal Count Form. A separate Daily Meal Count form must also be used for each meal type served (e.g., breakfast and lunch).

Sponsors may use an alternate meal count form but only with prior approval from DECAL. Requests to use alternate forms must be submitted to the sponsor's assigned Technical Assistance Coordinator. Use of alternate forms without DECAL's approval could result in a meal reclaim or disallowed costs for the period covered by the records at issue. The Alternate Approval Letter and the alternate forms must be maintained on file and made available upon request. Please see [DECAL SFSP Policy #5, Recordkeeping Requirements for All Sponsors and Sponsored Facilities Participating in the SFSP](#) for additional information on the use of alternate forms.

If a sponsor delivers meals once a week for the rural non-congregate meal site (breakfast and lunch), do I enter the meal times one hour apart even though they are being delivered at the same time?

As per [Implementation Guidance: Summer 2023 Non-Congregate Meal Service in Rural Areas](#) and DECAL's [memo](#), some of the meal service time requirements continue to apply as found in 7 CFR 225.16(c). Meal service times must be included in the Site Application and approved by DECAL; however, sponsors offering a non-congregate meal service are not required to serve breakfast in the morning or allow one hour between the end of one meal service and the start of the next. This would mean that within the Site Application, a sponsor serving both breakfast and lunch at the same time would need to enter the accurate time frame for the meal service. The meal service times for both meal types would be the same.

What are some examples of allowable multi-day meal service practices?

State agencies, at their discretion, are allowed to approve sponsors for multi-day meal issuance for the allowable number of reimbursable meals that would be provided over a maximum 10-day calendar day period.

Example #1 – Once per week

- 7 days of meals picked up on Monday; or
- Meals picked up based on last name; A-F receive 7 days of meals on Mondays and G-K receive meals on Tuesdays, etc.

Example #2 – Twice per week on Mondays & Fridays

- 4 days of meals picked up or delivered on Monday; 3 days of meals picked up or delivered on Friday.

Example #3 – Every two weeks

- 10 days of meals provided every other week on the scheduled day.

What are some examples of unallowable multi-day meal service practices?

Example #1 – School starts on August 21 and a site’s last distribution day is August 18. The site distributes 10 days’ worth of meals on the last distribution day. This practice is unallowable as the site should have only served 3 days’ worth of meals (i.e., 08/18, 08/19, 08/20). 7 days’ worth of meals would be unallowable since school is back in session on 08/21.

Example # - Pick-up meal service operated every Friday and provides 10 days’ worth of meals (10 breakfasts and 10 lunches). This practice is unallowable as the sponsor has exceeded the daily meal allowance per child. If meal pick-up service occurs every Friday, then a maximum of 7 days’ worth of meals (7 breakfasts and 7 lunches) can be provided to ensure no more than the maximum daily meals are provided.

If a sponsor request that each household complete and sign a Parent Consent to Participate Form that will contain all of the children's information and at each pickup, will this information suffice for maintaining integrity with the rural non-congregate meal service option?

For Parent/Guardian Pickup, DECAL also recommends the following:

- Ask the parent/guardian to present a form of valid child or adult identification (ID). Valid forms of ID may include, but are not limited to, school identification card, participant's passport, government-issued child identification card, or any document proving parent/guardian identity and relationship to the child or adult, such as an adoption decree; doctor, clinic, or hospital record; religious record; or day care center record; or
- A daily parent/guardian pickup roster by collecting the parent and/or guardian name, number of participants in the household, and names of participants in the household.

For Home Delivery, as per Federal guidance, the following would be required:

- Sponsors must identify and invite households of only eligible children to participate in the meal delivery service;
- Sponsors must obtain and maintain written consent from the eligible participant's parent or guardian that the household wants to receive delivered meals. Written consent could include hard copy documentation, emails, or other electronic means of communication. Written consent documentation must be maintained and made available upon request;
- Confirm and maintain documentation supporting the household's current contact information, the number of eligible children in the household, and how many meals are delivered to each home;

- Sponsors must ensure that they will not exceed the maximum number of meals per child per day; and
- Protect the confidentiality of participants and their households throughout the process in accordance with confidentiality and disclosure provisions in the National School Lunch Act and 7 CFR 225.15(f)-(l).

May sponsors only deliver meals to children that qualify for free or reduced-priced meals, even if the rural site qualifies as an open site? If so, are the other children that would be fed by the rural open site required to pick up the meals?

Yes, based on the most recent guidance, only those participants that are designated as free or reduced would qualify to receive a home delivered meal, even if the participant's address is rural. Those children that are in rural areas that would be considered paid, would have to go to a non-congregate site and either pick up a meal or have their parents pick up a meal.

Do sponsors check *Monday to Sunday* in the GA ATLAS Site Application if 1-week worth of meals will be delivered on one [1] day?

No, the sponsor should only indicate (check) the actual day(s) that the meals will be delivered. If meals are delivered/served on Monday for five [5] days (*Monday to Sunday*) worth of meals, then only Monday should be selected. However, the sponsor must indicate the maximum number of meals that will be served and the number of days the site will operate.

IV. Meal Service

Are sponsors required to follow established meal patterns when serving non-congregate meals?

Yes. Like congregate meals, non-congregate meals must comply with the current meal pattern requirements for SFSP and SSO.

Can sponsors provide food items in bulk, either through pick up or home delivery?

Yes, at the State's discretion. State agencies must determine whether a sponsor's proposed bulk distribution meets the safety, service, and integrity standards of the Program. States should follow the guidance at <https://www.fns.usda.gov/tn/offering-multiple-meals-part-summer-non-congregate-meal-service>, when considering allowing bulk distribution.

What are the requirements for serving non-congregate meals related to meal modifications for participants with disabilities or other medical or special dietary needs?

States and sponsors are still required to provide meal modifications for participants with disabilities when serving non-congregate meals. When planning a non-congregate meal service, State agencies and program operators should consider how individuals who require meal modifications will be identified and served appropriately. Individual substitutions may also be made at a sponsor's discretion for a child with a non-disability medical or other special dietary need. Households should have a way of notifying the sponsor of the need for individual substitutions due to medical or other special dietary needs.

Can offer versus serve (OVS) be used in non-congregate settings?

Yes, with State agency approval, only SFAs may use OVS. When using OVS in a non-congregate setting, SFAs should consider the unique service situations of each site, as well as each site's ability to follow appropriate safety measures. All required meal components or food items must be offered, and all participants must have the opportunity to select a reimbursable meal. FNS encourages SFAs that wish to use OVS to think creatively about how to implement this flexibility while ensuring that all meal service requirements are met.

What are the requirements related to site caps for non-congregate meal service in rural areas?

The site cap requirement remains for both congregate and non-congregate meal service. A site cap is established for all sites during the application and approval process. When evaluating a proposed food service site, the State agencies must ensure that sites have adequate facilities and capacity to prepare and/or distribute meals for the number of children they are approved to serve. For non-congregate meal sites, site caps must be set to ensure that only one meal per child per meal service is prepared and distributed. Site caps may be adjusted and approved by the State agency as necessary.

For more information regarding site caps in the SFSP, please see policy memorandum [SFSP 16-2015: Site Caps in the Summer Food Service Program: Revised](#).

How many meals per child may be provided through non-congregate meal service?

The maximum number of meals that may be offered at a non-congregate site and a congregate site is the same. Up to two meals, or one meal and one snack, per child, per day may be offered, in any combination except lunch and supper. The State agency may, at its discretion, approve sponsors for bulk distribution of meals for the allowable number of reimbursable meals that would be provided over a 10-day calendar day period.

Are second meals reimbursable for non-congregate meal service?

No. Sponsors may only claim one meal per child, per meal service for non-congregate meal service.

Do the meal service time requirements in SFSP apply to non-congregate meal service?

Some meal service time requirements continue to apply, per Program regulations at 7 CFR 225.16(c). Meal service times still need to be established for each site, included in the sponsor's application, and approved by the State agency. These requirements may be met through State agency approved pick-up schedules or delivery plans with designated times for distribution. The State agency must approve any changes in meal service times. Sponsors offering a non-congregate meal service are not required to serve breakfast in the morning or allow one hour between the end of one meal service and the start of the next.

Can meals be distributed to parents/guardians at non-congregate pickup locations?

Yes. Sponsors that have been approved to operate non-congregate meal service in rural areas may distribute meals to parents or guardians to take home to their children. Sponsors opting to distribute meals to parents or guardians must maintain accountability and program integrity. This includes processes to ensure that meals are only distributed to parents or guardians of eligible children, and that duplicate meals are not distributed to any child.

How many meals may program operators serve at one time?

The Consolidated Appropriations Act, 2023 ([P.L. 117-328](#)), allows for the distribution of up to 10 days of meals at one time. In considering a sponsor's proposed multi-day meal issuance plans, State agencies should consider both the benefits of multi-day issuance and the need to maintain the food safety, service, and integrity standards of the Program. State agencies also have the discretion to limit the number of meals a sponsor distributes at once. Meals provided through multi-day meal service should not require more than minimal preparation by children and families; specifically, non-congregate meals should not require cooking, chopping, or other preparation requiring equipment or cooking skills. SFSP and/or NSLP and School Breakfast Program (SBP) regulations and meal pattern requirements still apply when offering non-congregate meals, whether through home delivery or meal pick-up.

How is the home delivery model for non-congregate meal service different from the mobile meal model operated by some summer sponsors during the past several years?

Under the home delivery model for rural non-congregate meal service, SFSP site requirements do not apply since individual homes are not considered sites.

The mobile meal model follows the definition of “site” outlined in 7 CFR 225.2. The mobile meal model is a type of *congregate* service that involves a sponsor delivering meals to an area, using a route with stops at approved sites in the community. The meal service is supervised, and all meals are consumed at the site, on the bus, or near the drop-off location as outlined in [SP 02-2014, SFSP 02-2014: Mobile Feeding Options in Summer Feeding Programs](#).

How can a non-SFA sponsor identify eligible children in a non-area eligible area?

A non-SFA sponsor may use the household application procedures outlined in 7 CFR 225.15(f) to identify eligible children in non-area eligible areas and/or to obtain household information for participation. A non-SFA sponsor that wants to use NSLP/SBP student data to identify eligible children in non-area eligible areas and/or for participation in the home delivery model must have a Memorandum of Understanding (MOU) with an SFA to use the student data for those purposes. Sponsors are responsible for the proper handling and storage of student data with applicable SFAs in accordance with confidentiality and disclosure provisions in the National School Lunch Act and SFSP regulations (7 CFR 225.15(f)(1)).

Is there a difference with how a sponsor should put the home meal delivery location into GA ATLAS?

If operating home delivery, as per USDA guidance, [Questions and Answers #2: Summer 2023 Non-Congregate Meal Service in Rural Areas](#), [Implementation Guidance: Summer 2023 Non-Congregate Meal Service in Rural Areas](#), and [DECAL’s Rural Non-Congregate Meal Services in the Summer Food Service Program](#), Site Applications would still need to be submitted; however, each individual home would not be required to have separate Site Applications. The home delivery route, as a whole, would be considered the ‘site’ for the purposes of site requirements and the Site Application in ATLAS. During the application process, sponsors opting to use home delivery must provide delivery schedules with meal delivery address locations.

In 2021, we gave each child a breakfast meal and a lunch meal at the same time with the intent that breakfast would be used the following morning. We put the breakfast time in Atlas so that it ended a minute before the lunch meal began so that during a twenty-or thirty-minute time period we were giving both meals. Is that the way it should be done now if we decide to give a breakfast and a lunch meal at the same time?

As per [Implementation Guidance: Summer 2023 Non-Congregate Meal Service in Rural Areas](#) and DECAL’s [memo](#), some of the meal service time requirements continue to apply as found in 7 CFR 225.16(c). Meal service times must be included in the site application and approved by DECAL; however, sponsors offering a non-congregate meal service are not required to serve breakfast in the morning or allow one hour between the end of one meal service and the start of the next. This would mean that within the site application, a sponsor serving both breakfast and lunch at the same time, would need to enter the accurate time frame for the meal service. The meal service times for both meal types would be the same.

Can HH SFSP sponsors serve shelf-life foods and milk that meets USDA requirements to sites participating in the rural non-congregate meal service option?

Shelf stable foods can be served in non-congregate settings; however, the SFSP meal pattern must still be met. If shelf stable foods are to be served, including milk, please consider serving meals that are not high in sodium and saturated fats and that would be considered appetizing to children.

V. Monitoring

Are SFSP monitoring requirements of non-congregate sponsors and sites the same as they are for congregate sponsors and sites?

Yes. All existing monitoring requirements for State agencies and sponsors apply to non-congregate sponsors and sites. This includes but is not limited to pre-approval visits, sponsor and site reviews, follow-up reviews, and meal preparation facility reviews by State agencies (as specified in 7 CFR 225.7) and site visits and reviews conducted by sponsors (as specified in 7 CFR 225.15).

[The SFSP Administrative Guidance](#) also advises that pre-operational visits are required for all new sites and sites with previous serious deficiencies. Please keep in mind as per Federal guidance, existing sites that are switching from a congregate feeding model to non-congregate meal services are considered “new” sites for monitoring purposes.

Federal guidance advises the following with regard to home delivery: *a full meal service review may include observing the meals being loaded into delivery vehicles, checking meal logs and delivery routes, and additional items outlined by the State agency. The sponsor must also ride along with or follow the delivery driver along the distribution route to observe the meal delivery.*

In all non-congregate service models, the sponsor must ensure eligible children are receiving the proper number of meals that meet nutritional standards and are consistent with all applicable State and local health, safety, and sanitation standards.

How should sponsors include non-congregate rural sites in the monitoring process?

Just as they would for congregate meal sites per 7 CFR 225.15(d)(3), sponsors must conduct a full review of food service operations at each non-congregate meal site at least once during the first four weeks of program operations. Taking into consideration the distance and time it takes to monitor on-site operations, particularly in rural areas, the sponsor may conduct an initial site visit and full meal service review at the same time, but within the first two weeks of operation. If sponsors need to conduct additional reviews after the initial site visit and full meal service review have been completed on-site, and if no further on-site observation is needed, the State agency may establish off-site monitoring criteria. For further information on monitoring activities that can be conducted off-site, see [SFSP 06-2023 Oversight and Monitoring of the Summer Food Service Program - Guidance on On-site and Off-site Strategies and Options](#).

What does a full site review of food service look like for non-congregate meal service?

The purpose of a full site review of food service operations is to ensure the site is operating as described in the approved site application. A full site review of meal service for non-congregate sites may look different than a full site review of a congregate meal service, depending on the meal service model being used. A full site review of a non-congregate site includes reviewing the entire meal service time, which is the time established by the sponsor for a site to distribute meals. For example, with a home delivery meal service model, a full meal service review may include observing the meals being loaded into delivery vehicles, checking meal logs and delivery routes, and additional items outlined by the State agency. The sponsor must also ride along with or follow the delivery driver along the distribution route to observe the meal delivery. In the instance of a meal pickup model, such as grab-and-go, meal service review may also

include observing the self-preparation of meals. In all non-congregate service models, the sponsor must ensure eligible children are receiving the proper number of meals that meet nutritional standards and are consistent with all applicable State and local health, safety, and sanitation standards.

Are existing sites which are switching from a congregate feeding model to non-congregate meal service considered “new” sites for monitoring purposes?

Yes. Sites which are switching from a congregate feeding model to non-congregate in summer 2023 are considered “new” sites, including sites switching to operating a hybrid of both congregate and non-congregate (e.g., congregate breakfast and non-congregate lunch). As outlined at 7 CFR 225.15(d)(2), sponsors must visit all new sites at least once during the first two weeks of program operations. This means sponsors must visit all existing sites switching from congregate to non-congregate in summer 2023. However, USDA understands the benefits of congregate meal service and encourages the continuation of congregate meal service when feasible.

VI. General/Miscellaneous

Are sponsors required to announce the availability of non-congregate meals?

Yes. Annual announcements are required in one of two ways: Sponsors of congregate and non-congregate sites must announce the availability of free meals in the local media or State agencies may issue a media release for all sponsors operating SFSP in the State, as outlined in Program regulations (7 CFR 225.15(e)). Sponsors should include in the announcement the days of delivery/pick-up when providing non-congregate meal service in rural areas.

Do sponsors need to display the “And Justice for All” (AJFA) posters at pick up sites and for home delivery transportation?

The AJFA poster must be prominently displayed (such as in a window) on all vehicles making door-to-door drop deliveries at homes, and in all pick up facilities and locations providing non-congregate meal service in rural areas. State agencies and sponsors must ensure that outreach strategies and meal service does not discriminate based on race, color, national origin, age, disability, or sex.

Are there additional health and safety requirements for Program operators and site supervisors providing non-congregate meal service?

All State-sponsor agreements are required to include an agreement to store, prepare, and serve food and maintain proper sanitation and health standards in conformance with all applicable State and local standards. Therefore, sponsors providing non-congregate meal service in rural areas should prepare a food safety plan to ensure the meal service will be conducted safely. As a reminder, all food service staff must be trained in Program operations, which include local health, food safety, and sanitation guidelines. Sponsors should contact the State SFSP administering agency for training materials promoting food safety in the non-congregate meal service setting. Sponsors can also visit the Institute of Child Nutrition’s Food Safety for Summer Meals webpage (<https://theicn.org/icn-resources-a-z/foodsafety-for-summermeals/>) for additional resources related to food safety in summer meals.

Oversight and Monitoring for CACFP

Program Requirements

Sponsors in the CACFP are required to conduct the following reviews of their sponsored facilities. *Please see [DECAL CACFP Policy Memorandum, Monitoring Requirements](#), for further information:*

- Pre-Operational visits must be conducted on all "new" facilities. "New" is defined as a facility that has never operated the CACFP under the auspices of the sponsoring organization or which has operated under the sponsoring organization but has had a six-month break in participation. Pre-operational visits are not considered reviews and must not be included as such when calculating the number of reviews completed.
- Per 7 CFR 226.16(d)(4)(iii), sponsoring organizations must review each facility three times a year, except as provided in 7 CFR 226.16(d)(4)(iv) which will be discussed later in this document.
 - DECAL defines a "year" as the Federal Fiscal Year, which runs from October 1st to September 30th.
 - At least two of the three reviews must be unannounced;
 - At least one unannounced review must include observation of a meal service;
 - At least one review must be made during each new facility's first four weeks of Program operations;
 - Not more than six months may elapse between reviews; and
 - Follow-up reviews may need to be conducted. (If, in conducting a facility review, a sponsoring organization detects one or more serious deficiency, a follow-up review will need to be scheduled to assess whether the facility has corrected problems of a serious nature that were found during the previous review. This review must be unannounced, regardless of the type of facility. Serious deficiencies are described in 7 CFR 226.16 (1)(2).

In response to State agencies and sponsoring organizations implementing innovative solutions to conduct off-site reviews and provide oversight of the CACFP throughout the public health emergency, FNS has developed guidance for conducting off-site monitoring.

The review must take place at the institution or facility's location, though portions may be conducted at the State or sponsoring organization's office, informally known as the 'desk review' or 'desk audit' portion. There may be a combination of reviews conducted to complete the Program review. Please see DECAL Policy Memorandum, *Oversight and Monitoring of the Child and Adult Care Food Program – Guidance on On-site and Off-site Strategies and Options*, for more details on combination on-site and off-site reviews.

Best Practices for CACFP Monitoring

- Plan ahead and communicate.
- Develop a standard process.
- Consider feasibility of a hybrid approach.
 - Obtain documents through a secure platform to ensure personally identifiable information is secure.
 - Conduct the exit interview can be conducted via video conferencing as an off-site approach.
- Develop checklists and tools to ensure operators are aware of on-site and off-site review requirements and documentation submission procedures.
 - Request additional information as needed to resolve issues found in the off-site portion.

- Document any off-site elements of the review and interviews.
- Practice using a file sharing platform among staff before conducting a review.

Evaluate your established review standard procedures and make modifications to reflect latest learned strategies.

Oversight and Monitoring for SFSP

Program Requirements

Sponsors in the SFSP are required to conduct the following reviews of their sponsored SFSP meal service sites. *Please see [DECAL SFSP Policy #16 – Monitoring Requirements of Sponsors Participating in the Summer Food Service Program](#), for further information:*

- Sponsors are required to visit all new and problem sites before sites begin operation. These visits must ensure that sites have adequate facilities to provide meal services for the number of children expected to attend.
- Sponsors are also required to visit each of their sites at least once during the first two weeks of operations under the Program and must promptly take such actions as are necessary to correct any deficiencies. Sponsors must conduct a visit during the first two weeks for the following:
 - All new sites;
 - All sites that have been determined by the sponsor to need a visit based on criteria established by the State agency pertaining to operational problems noted in the prior year; and
 - Any other sites that the State agency has determined need a visit.
- Sponsors must also conduct a full review of food service operations at each site at least once during the first four (4) weeks of Program operations, and thereafter must maintain a reasonable level of site monitoring.

In response to State agencies and sponsoring organizations implementing innovative solutions to conduct off-site reviews and provide oversight of the SFSP during the public health emergency, FNS has developed guidance for conducting off-site monitoring.

The review must take place at the sponsor's or site's location, though portions may be conducted at the State or sponsoring organization's office, informally known as the 'desk review' or 'desk audit' portion. There may be a combination of reviews conducted to complete the Program review. Please see [DECAL Policy Memorandum, Oversight and Monitoring of the Summer Food Service Program – Guidance on On-site and Off-site Strategies and Options](#), for more details on combination on-site and off-site reviews. The on-site and off-site strategies provided in the above-mentioned memo guidance apply to both congregate and non-congregate meal service options.

Best Practices for SFSP Monitoring

- Plan ahead and communicate.
- Develop a standard process.
- Consider feasibility of a hybrid approach.
 - Obtain documents through a secure platform to ensure personally identifiable information is secure.
 - Conduct the exit interview can be conducted via video conferencing as an off-site approach.

- Develop checklists and tools to ensure operators are aware of on-site and off-site review requirements and documentation submission procedures.
 - Request additional information as needed to resolve issues found in the off-site portion.
- Document any off-site elements of the review and interviews.
- Practice using a file sharing platform among staff before conducting a review.

Evaluate your established review standard procedures and make modifications to reflect latest learned strategies.