



Rural Non-congregate Meal Service Option Q&As

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.

Are the monitoring requirements the same for the rural non-congregate meal service option and are sponsors required to conduct pre-operational visits, site visits and/or reviews at home delivery locations?

As per [Questions and Answers #2: Summer 2023 Non-Congregate Meal Service in Rural Areas](#), all existing monitoring requirements for sponsors apply to non-congregate sponsors and sites. This includes but is not limited to pre-approval visits, site visits and reviews as per 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.

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.



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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.

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 is 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.

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 sponsors distribute multiple days' worth 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



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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.

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



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Application in ATLAS. During the application process, sponsors opting to use home delivery must provide delivery schedules with meal delivery address locations.

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.

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 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 participant's 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?



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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.

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](#) and the [Georgia Rural County Map](#) (for potential rural pockets indicates that the site is not in a rural area?

No, sites located in unserved/underserved counties identified by DECAL do not automatically qualify to participate in non-congregate meal service flexibilities. Federal guidance advises that all sites wishing to participate in these flexibilities must be in an area designated as 'rural'. If an unserved/underserved county does not meet the criteria of being designated as 'rural', then that county would not qualify to participate in the non-congregate meal services flexibilities.

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.

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.