

# 2025 Ohio Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Rural Non-Congregate Meals Guide and FAQ

Certain rural areas can now distribute nutritious meals to kids outside of the typically required group (congregate) settings through the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO). Approved program operators in low-income, rural areas can use alternate service models that are tailored to the needs of the children and communities they serve.

## SPONSOR RESPONSIBILITIES

Public or private non-profit school food authorities (SFA); public or private non-profit colleges or universities; public or private non-profit residential summer camps; units of local, county, municipal, State, or Federal Government; or any other type of private non-profit organizations may apply to sponsor a summer meal site located in a rural area using the rural non-congregate option.

Organizations that did not participate as an SFSP sponsor in the prior year must first complete the [SFSP Potential Sponsor Survey](#) and the required steps to become an SFSP sponsor.

Existing and new sponsors wishing to participate in the rural non-congregate option, in addition to the SFSP or SSO application requirements, must also complete the following:

1. Organizations and SFA's not approved for non-congregate meals in Summer 2024 as well as Program operators new to the non-congregate meal service model must attend a rural non-congregate training provided by the Ohio Department of Education and Workforce (the Department).

This training will cover the allowable flexibilities provided, regulatory requirements, application process, and best practices for rural meals using the non-congregate flexibility, or "grab and go" style meals.

[Register for March 11](#) 2:00 p.m. - 3:00 p.m.

[Register for April 14](#) 9:00 a.m. – 10:00 a.m.

[Register for May 22](#) 11:00 a.m. - noon

2. Update all staff training to include the non-congregate requirements.
3. Include a food safety plan and the non-congregate service model with the required notification letter to the local public health department.
4. Submit a [rural non-congregate integrity plan](#).
5. Sponsors applying for non-congregate meal service sites that qualify through area eligibility must include how their outreach efforts are targeted to children that live in the geographic area in which the site is located.



6. SFSP sponsors must conduct an initial site visit within the first two weeks of program operations for all new sites and existing sites that are new to non-congregate service.
7. SFSP and SSO sponsors must conduct a full food service review within the first four weeks of program operations for all sites, including sites exclusively providing home delivered meals.

## ELIGIBILITY

### **1. Who is eligible to sponsor a rural non-congregate site?**

New and existing SFSP and SSO sponsors may submit applications for non-congregate meal service plans for rural sites where no congregate meal service is available.

### **2. 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. *Good standing* means the status of a program operator that meets its Program responsibilities, is current with its financial obligations, and, if applicable, has fully implemented all corrective actions within the required period of time. Sponsors that have experienced serious deficiencies in prior years may be approved to operate a non-congregate meal service if, to the satisfaction of the Department, all appropriate corrective actions to prevent recurrence of the deficiencies have been taken.

### **3. 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. Sponsors should work with their communities to determine how best to leverage resources to provide a congregate meal service that meets the needs of children in non-rural areas.

### **4. Will the Department accept rural pocket requests?**

Yes. A “rural pocket” is an area within a Metropolitan Statistical Area which may be determined to be rural in character based on data sources other than those used for the [Rural Designation](#) map. The Department will work with sponsors to identify potential rural pockets for submission to FNSRO for approval. The intent of rural non-congregate meal service is to increase access to summer meals for children living in rural areas. The Department will not consider rural pocket requests based solely on factors that are independent of rurality measures. These include but are not limited to cost, convenience, area eligibility, economic conditions, food deserts, poverty, or capacity concerns.

## **5. 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. Sponsors should work to identify and prioritize those rural areas that the congregate SFSP and SSO cannot reliably reach.

## **6. May a sponsor choose to solely operate non-congregate meal service?**

Yes. There are no Federal restrictions prohibiting a sponsor from solely operating non-congregate meal service, where allowable, with Department approval.

## **7. How does the Department identify whether an area has “no congregate meal service” for the purpose of determining if non-congregate meal service is allowable?**

Program regulations require that, when evaluating a proposed food service site, the Department shall ensure that the area which the site proposes to serve is not or will not be served in whole or in part by another site, unless it can be demonstrated to the satisfaction of the Department that each site will serve children not served by any other site in the same area for the same meal.

Sponsors providing non-congregate meals within close proximity of a congregate meal service must provide documentation as to why the sites will not be serving duplicative meals. The Department defines close proximity as within one mile between rural sites and one-half mile between urban sites operating on the same day for similar meal types.

Examples of reasons that could be included:

- Sites appealing to specific age groups, such as when a site at an elementary school attracts primarily young children, while a site at a nearby teen center attracts primarily teens;
- Appealing to children with special dietary requirements, such as for kosher or halal meals;
- Sites also may be close in proximity but separated by a physical barrier that limits access. For example, sites located on opposite sides of a busy highway may be close in proximity, but access to the sites is restricted due to inability of the children to safely cross the highway;
- Offering the same, short meal service times to avoid the possibility of children traveling from one site to another;
- Limited capacity of a congregate site that prevents it from serving the community at large;
- Sites serving the same children on different days, different weeks, or for different meals on the same day.

See the Ohio policy on [Close Proximity of Sites in Summer Meal Programs](#) for additional information.

## 8. Can sites provide both congregate and non-congregate meals?

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

Per Program regulations, the Department may approve sites to operate a hybrid program which will provide both congregate and non-congregate meal services. The Department must ensure that the proposed site meets applicable site approval requirements and that the proposed site will only conduct a non-congregate meal service when the site is not providing a congregate meal service. The sponsor must also have an organized and supervised system which prevents overlap between meal services and reasonably ensures children are not receiving more than the daily maximum allowance of meals as required in [7 CFR 225.16\(b\)\(3\)](#).

Examples of how sites can offer both congregate and non-congregate meal services include, but are not limited to:

- A site that only offers breakfast through a congregate meal service may be approved to provide 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 10-day period following their last congregate meal service day (provided that the 10 days are included in the site's approved service period).

The integrity plan submitted details how the non-congregate meal service will be provided when the site is not providing a congregate meal service.

The Department will consider the processes outlined in the submitted integrity plan, proposed meal service times, and operational days to determine if the sponsor has the administrative capability and capacity to carry out the proposed hybrid meal service operations with integrity at all its applicable sites.

Please note, the non-congregate option is not intended to replace congregate meal service.

## 9. My school wants to provide congregate meals at our summer science camp and still provide non-congregate meals to the community. 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, the Department 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 as outlined in [7 CFR 225.6\(h\)\(3\)\(iii\)](#). Sponsors operating an open non-congregate site near a closed enrolled congregate site are encouraged to schedule their meal service times to start and finish before the closed enrolled site's meal service ends, to prevent meal duplication.

Indicators of potential integrity issues for non-congregate sites operating in close proximity to congregate sites:

- Splitting meal service between sites: attempting to serve more than the maximum allowable meals per day split between neighboring sites. For example, one site serving breakfast and lunch with a neighboring site serving supper and snack.
- Open site types in close proximity: adjacent sites are both open and restricted open without physical conditions that limit access.
- Extended meal service times: sites in close proximity requesting to operate extended meal service times.

See policy memorandum [SFSP 15-2023, Best Practices for Determining Proximity of Sites in the Summer Food Service Program](#) and [Summer Meals to Go: Navigating Site Proximity](#) for best practices.

## 10. Can open sites pre-register families?

Per program regulations, “open sites” are sites at which meals are made available to all children in the area. Program sponsors providing opportunities for participants to pre-register for meals experience less food waste, are more easily positioned to accommodate dietary needs due to disability, and have improved integrity measures.

Sponsors requiring registration or enrollment forms prior to meal distribution must be approved as a *closed enrolled* site only. Sponsors may enroll children on site or at anytime throughout the program. Closed enrolled sites are open only to enrolled children or to an identified group of children and must also establish eligibility either through the individual income eligibility of the children attending the site or through area eligibility.

### Civil Rights Considerations

- Sponsors using registration forms must include the [USDA non-discrimination statement](#) on all forms, provide the forms at all meal distribution sites, and include it in public information about the meal service such as press releases and media posts.
- Sponsors may, but are not required to, include participant racial and ethnic data questions on meal registration forms if the questions are comparable to those found in the Ohio Summer Food Service Program Racial and Ethnic Data Form. Sponsors may not require participation in the racial and ethnic data collection to receive meals.
- Sponsors using registration forms are encouraged to provide the form in both digital and print format and include an opportunity to register on-site and via telephone. Sponsors are also encouraged to include an opportunity for participants to provide information on disabilities that may need dietary accommodations.

### Program Considerations

- Sponsors using registration forms are encouraged to use the form to solicit feedback on meal quality and food preferences for program improvement, but these questions cannot be required for participation.

- Sponsors may use registration forms to designate a guardian, such as another household member or caretaker to pick up meals for the child registered, in accordance with the sponsor's parent/guardian pick up policy.
- Sponsors may include a program integrity statement on the forms (for example acknowledgement of one meal box per child).

## MEAL SERVICE

Approved sponsors may provide non-congregate meal service in rural areas where no congregate meal service is available. When using non-congregate meal service, sponsors should consider the unique service situations of each community, as well as each site's ability to follow appropriate safety measures. As with congregate meal service, sponsors must ensure non-congregate meal service meets State and local health and safety requirements. In addition, sponsors should ensure food selections and packaging promote food quality and safety. Sponsors should also include instructions on at-home storage and preparation, when applicable.

Non-congregate meal distribution methods typically will be either a home delivery or meal pick-up.

## HOME DELIVERY

Meals are delivered directly to homes. Delivery could be completed by mail or delivery service or could be hand-delivered by the sponsor's staff or volunteers.

### **11. Can we deliver meals directly to the child?**

Yes. Sites meeting all other eligibility criteria may be approved to deliver meals directly to children's homes.

### **12. Is the home delivery model for non-congregate meal service the same as the mobile meal model operated by some summer sponsors during the past several years?**

No. Under the home delivery model for rural non-congregate meal service, site requirements do not apply since individual homes are not considered sites. The site for home delivery means the distribution location or route for the non-congregate meal service. Ohio defines a site for home delivery as the central administrative location of the home delivery service.

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*.

### **13. Are monitoring visits required for sites using home delivered meals?**

Yes. Monitoring visits are a requirement for all sites participating in both the SFSP and SSO. SSO sponsors must conduct a full food service review for each site within the first four weeks of operations. SFSP sponsors must conduct:

- Preapproval visits for all new sites, sites new to non-congregate meal service, and all sites with operational problems, including home delivery. See the Ohio Policy on [Criteria](#)

- [for Determining Sites with Operational Problems](#) for additional information.
- An initial site visit within the first two weeks of program operations for all new sites, all existing sites that are new to non-congregate service, and all sites with operational problems in the prior year, including home delivery. See the Ohio Policy on [Criteria for Determining Sites with Operational Problems](#) for additional information.
  - A full review of food service operations at each site, including home delivery, at least once during the first four weeks of Program operations. This review may be conducted at the same time as the site visit if the review happens within the first two weeks of operations.

Monitoring plans for home delivery are included with the sponsor's integrity plans.

**14. If the sponsor or site's staff or volunteers are directly delivering meals to children's homes, does the monitor need to accompany the drivers along the delivery route?**

Yes. The monitor should accompany the drivers for the entirety of the route as part of the sponsor's monitoring responsibilities to ensure site operations.

**15. If a sponsor is using a postal or other delivery service to deliver meals directly to children's homes, does the monitor need to follow the drivers along the delivery route?**

No; however, the sponsor must be able to provide the same level of monitoring and oversight. The sponsor could conduct a survey of participants, review the food production facility from where meals are shipped, review the shipping and delivery records, and have a delivery sent to the sponsor to test meal quality as part of a monitoring visit. Note that meals tested by the sponsor for meal quality are not reimbursable meals and may not be claimed. Some manner of on-site elements must be included in the monitoring plan to ensure site operations.

**16. Does the child receiving the home delivered meals need to live in a rural area?**

Yes. Home delivered meals must only be delivered to addresses that meet the definition of rural. Meals delivered to households that are not within a USDA [designated rural area](#) will be disallowed.

**17. What is considered the site for home delivered meals?**

Per [7 CFR 225.2](#), a "site" means the place where a child receives a program meal. A site may be the indoor or outdoor location where congregate meals are served, a stop on a delivery route of a mobile congregate meal service, or the distribution location or route for a non-congregate meal service. A child's residence is not considered a non-congregate meal site. For purposes of using the home delivery option, Ohio defines a site for home delivery as the central administrative location of the home delivery service. For example, a site may be an elementary school where the meals would have been distributed from had they not been home delivered.

## **18. Can open sites use the home delivery option?**

No. Sites using the home delivery option must be approved as closed enrolled.

## **19. For home delivered meals, is each home considered a meal site?**

No. For purposes of using the home delivery option, Ohio defines a site for home delivery as the central administrative location of the home delivery service.

## **20. Can we deliver meals statewide from a single site?**

No. The site must serve children that live in the geographic area in which the site is located.

## **21. How does a site qualify for home delivery?**

For purposes of using the home delivery option, Ohio defines a site for home delivery as the central administrative location of the home delivery service. For example, an elementary school. All sites using the home delivery option must be approved as closed enrolled.

Closed enrolled sites establish eligibility either through the individual income eligibility of the children enrolled in the home delivery program or through area eligibility.

To establish eligibility based on the income of the individual children, sites must collect household applications. At least 50 percent of the children enrolled in the site's home delivery program site must be eligible for free or reduced-price school meals.

If the site is not establishing eligibility based on the income eligibility applications, the site must be located in an [area in which poor economic conditions exists](#), commonly referred to as area eligibility. Establishing a home delivery site through area eligibility should only be used if the site is serving children that live in the area in which the site is located.

Area eligibility may be established using one of the following methods:

- (1) The attendance area of a school in which at least 50 percent of the enrolled children have been determined eligible for free or reduced-price school meals under the National School Lunch Program and the School Breakfast Program; or
- (2) A geographic area where, based on the most recent census data available or information provided from a department of welfare or zoning commission, at least 50 percent of the children residing in that area are eligible for free or reduced-price school meals under the National School Lunch Program and the School Breakfast Program.

Sponsors providing home delivered meals must have internal measures to ensure that meals are being provided to children in the community/geographic service area of the site where the meals are being distributed.



**22. Only one school in our district has at least 50 percent of enrolled children eligible for free or reduced-price school meals. Can we deliver meals to anyone in the district?**

Ohio defines a site for home delivery as the central administrative location of the home delivery service in a qualifying area, such as the elementary school. The intent of the program is to serve children that live in the area in which the qualifying site is located. Since an area in which poor economic conditions exist may be defined as an attendance area of a school where at least 50 percent of the enrolled children qualify for free or reduced-price meals, home delivered meals should be limited to the students within the attendance area of the qualifying school. Districts with limited qualifying schools wishing to deliver meals to all their students should consider qualifying the site(s) through household income applications rather than school data.

**23. Does the child receiving the home delivered meals need to qualify for free or reduced price meals?**

Possibly. Sites using the home delivery option must be approved as closed enrolled. Closed enrolled sites provide meals to all enrolled children free of charge and are open only to enrolled children or to an identified group of children, as opposed to the community at large. Closed enrolled sites must also establish eligibility either through the individual income eligibility of the children attending the site or through area eligibility.

To establish eligibility based on the income of the individual children, sites must collect household applications. At least 50 percent of the enrolled children at the site must be eligible for free or reduced-price school meals. Instead of determining the individual income eligibility of each enrolled child, a site may document its status as a closed enrolled site by using area eligibility information. Establishing a home delivery site through area eligibility should only be used if the site is serving children that live in the area in which the site is located.

Students receiving home delivered meals free of charge from conditional non-congregate sites must qualify as free or reduced price eligible.

**24. Are parents required to sign anything to receive home delivered meals?**

Yes. Written parental consent is required for home delivery per Program regulations. The consent form could be a hard copy, email, or other electronic means of communication and must include the date, the household's current contact information, the number of eligible children in the household and an attestation from the parent or legal guardian agreeing to having meals delivered to the home and that by receiving the home delivered meals they are ineligible to receive additional meals provided through the Child and Adult Care Food Program (CACFP), SFSP, or SSO. The Department reserves the right to take corrective action and disallow all meals observed to be in violation of the requirements.

**25. Is it permissible for sponsors to obtain parental consent for home delivery on the day of delivery?**

Yes, so long as the sponsor obtains parental consent before or at the time that the meals are delivered to the home. This should be reserved for specific, limited situations. For instance, if meals are being delivered to a multi-housing unit and families see the delivery and express interest in receiving meals for their children, the sponsor can ask for parental consent on the spot and provide a meal that day. This practice should be reserved for specific situations and should not be used in a manner that habitually impacts operations. The Department reserves the right to take corrective action and disallow all meals observed to be in violation of the requirements.

**26. Can we provide both home delivered meals and a meal pickup option from the same site?**

Possibly. Meal service methods should be included on submitted integrity plans and would be approved based on the sponsors ability to ensure all program regulations are met, including preventing duplication of meal services.

**27. Are home delivery sites still required to have meal count sheets?**

Yes. Sponsors using the home delivery method of meal service must have a version of a daily meal count sheet with student names, addresses, and the number of meals delivered to each address for each delivery date. The documentation must include identification of any spoiled or undeliverable meals.

Sponsors must protect the privacy of participating households and should secure all records, including protected personal information such as names and addresses, limiting access to those required for a specific program role.

**28. Can a sponsor contract with a vendor to provide home delivered meals?**

Yes. Home delivery may be a contracted service with a food service management company (FSMC). Like any other contracted service, the appropriate procurement processes must be followed, including competitive bidding if the value exceeds the federal acquisition threshold of \$250,000. Sponsors that are public entities, sponsors with exclusive year-round contracts with a FSMC, and sponsors that have no FSMC contracts exceeding the federal acquisition threshold and using contracts other than the small purchase contract template provided by the Department, must receive approval by the Department prior to signature.

Home delivery service contracts must include the following:

- If the FSMC uses a third-party delivery service, FSMC must disclose the service in advance and monitor any third-party delivery service for quality control.
- The FSMC must maintain documentation of food safety and meal pattern compliance for home delivery, in such a manner as to permit the Sponsor to verify documentation for meals provided to a specific home delivery address.
- The FSMC must communicate any changes or alterations to delivery services,

- including meal substitutions and replacement meals in advance to the Sponsor.
- The Sponsor will provide a confidential list of delivery addresses.
- The FSMC must provide the Sponsor with documented internal access and usage controls to ensure confidentiality of any personal identifying information.
- The FSMC must provide the Sponsor confirmation of each delivery, including participant name, delivery address, and the date of delivery. If FSMC uses a third-party delivery service, FSMC must provide the Sponsor all shipping and tracking information. Delivery confirmations shall be provided on a monthly basis (or more frequently as requested by Sponsor) and shall be communicated securely to ensure confidentiality of any personal identifying information.

## **MEAL PICK-UP**

In this model, meals are collected at the site and taken off grounds for consumption at a later time or date. Meal pick-ups come in a variety of styles such as a curbside pick-up, where vehicles queue and meals are packed into waiting cars by Program staff, a take-home backpack filled with meals for the weekend, a daily pick up from the sponsor's food truck, or any other number of ways to distribute the meals to children. Meals should be portioned, packaged, and presented to allow children to carry the food from the meal site to their home.

### **29. Can sponsors claim non-congregate meals for everyone in line to pick up meals if it is after the approved meal service time?**

Possibly. Sites must operate within approved meal service times. If meal service runs over on a certain day due to unanticipated events such as inclement weather, late deliveries, or traffic delays, all the participants that are in line to receive meals should be provided with meals. However, additional participants should not be allowed to get into the line past the end of the meal service time.

Meals served outside of the approved distribution time may be approved for reimbursement by the Department only if an unanticipated event, outside of the sponsor's control, occurs. The Department may request documentation to support approval of meals claimed when an unanticipated event occurs. If meal service runs longer than the approved meal service time repeatedly, sponsors must adjust operations to ensure meal services are completed within the approved meal service times or request approval from the Department to change the meal service times.

### **30. If a participant was unable to get to the meal distribution at the designated time, can they make arrangements with the sponsor to pick up at a later time or date?**

No. Meal pick up sites must have approved meal service times, which are commonly referred to as the distribution time for the pick up. Meals served outside the approved meal service time are not eligible for reimbursement. Meals served outside of the approved distribution time may be approved for reimbursement by the Department only if an unanticipated event, outside of the sponsor's control, occurs. A Program participant's inability to get to the meal site within the approved meal service time does not qualify as an unanticipated event. Sponsors are encouraged to survey their participants to determine the most appropriate meal service and

distribution times and use the parent and guardian meal pick up flexibility to allow families to designate a guardian that may pick up meals when the parent is unavailable.

### **31. Can non-congregate meals use Offer vs Serve (OVS)?**

Yes, if the sponsor is an SFA. SFA's are permitted to allow a child to refuse one or more items that the child does not intend to eat under the "[offer versus serve](#)" option. When implementing OVS, SFAs must follow the applicable requirements outlined in the [Offer vs Serve Guidance](#). 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.

When the child's choice is limited to only the fluid milk component, OVS is not being implemented correctly. Meals that do not meet the meal pattern will be disallowed. SFAs wishing to use OVS are encouraged to think creatively about how to implement this flexibility while ensuring that all meal service requirements are met. Program sponsors that are not SFAs are ineligible for the OVS option.

### **32. Are share tables permitted?**

Yes. Share tables are permitted in the non-congregate setting. "Share tables" are tables or stations where children may return whole food or beverage items they choose not to eat, which are then available to other children who may want additional servings. Share tables allow children to take an additional helping of a food or beverage item from the share table at no cost. Items on the share table are only available to students during the approved meal service time. Following the meal service, food or beverage items left on the share table may be served and claimed for reimbursement during another meal service or donated to a non-profit organization. In no instance can program or non-program adults take home leftover food. USDA donated food may never be sold, given away, or traded.

Program operators choosing to use share tables must follow the food safety requirements outlined in 7 CFR 210.13, 220.7, 226.20(l), and 225.16(a), and be aware of all applicable local and State health and food safety codes to ensure their use of share tables does not violate any of those codes. See USDA policy memo [SP41-2016 The Use of Share Tables in Child Nutrition Programs](#) and the [Ohio Department of Agriculture and Ohio Department of Health Guidance for Schools on Share Tables](#) for additional information.

## **MEAL SERVICE OPTIONS**

Flexibilities afforded through the rural non-congregate option include multi-day meal issuance, parent/guardian pick-up, and bulk meal distribution. These options are available to all types of sponsors in good standing that are approved to operate non-congregate meal service sites. Sponsors must indicate on the site application in the Claims Reimbursement and Reporting System (CRRS) and in the submitted integrity plan the meal service options the sponsor is intending to employ. Meals served using these flexibilities without prior approval from the Department may be disallowed.

### **33. May the Department limit rural non-congregate meal service options?**

Yes. Per Program regulations at [7 CFR 225.16\(i\)](#), the Department may limit the use of non-congregate meal service options on a case-by-case basis. After reviewing submitted integrity plans, the Department may determine that a sponsor does not have the capability to operate or oversee non-congregate meal services at their sites and may limit the sponsor's use of non-congregate meal service options. However, the Department may not limit the use of non-congregate options to only certain types of sponsors or ban certain options statewide. The Office of Nutrition will work with each sponsor to provide technical assistance and opportunity for revisions to the integrity plan during the application process. The Department's decision to prohibit a sponsor from using any of the meal service options is not an appealable action.

## **MULTI-DAY ISSUANCE**

Multi-day meal issuance is when multiple days of meals are provided on one day, whether unitized or comprised of bulk items. For example, a sponsor may provide five days of meals every Monday. Unitized meals served in this fashion would be provided in five distinctly packaged units or sets of menu items.

### **34. How many days of meals can be provided for the multi-day issuance option?**

Approved sponsors may distribute up to the allowable number of reimbursable meals that would be provided over a 10-calendar day period. The Department may establish a shorter time period, on a case-by-case basis. Sponsors electing this option must have documented procedures, submitted with their integrity plans, in place to ensure that sites do not distribute more than the daily meal limit when providing multi-day meal service.

### **35. Do we have to provide the Department with our plans to ensure meals are only distributed to eligible children and that duplicate meals are not distributed to any child when using the multi-day issuance prior to the start of operations?**

Yes. The sponsor's submitted integrity plans will include the sponsor's processes to ensure meals are only distributed to eligible children and that duplicate meals are not distributed to any child. The Office of Nutrition looks for a combination of the following integrity measures to be included when reviewing plans for the multi-day issuance flexibility:

- Restricting meal service times to shorter periods.
- Clear and visible signage notifying the public that children may only receive one meal type per child per day and that by receiving the meals they are ineligible to receive additional meals provided through the CACFP, SFSP, or SSO.
- Limiting sites to a single daily pick up.
- Registration or enrollment forms that are cross referenced with participant names at meal pick up.
- Providing one distribution time for all sites.
- Requiring children to be present at meal pick up.
- A signed attestation by the parent or legal guardian acknowledging that they have been informed that children are only eligible to receive one meal type per day.
- Color coding meal pack bags to identify individual sites or meal types.
- Limitations on the numbers of sites within a geographic area.
- Verbal affirmation from participant, parent or guardian at the time of pick up that additional meals have not been received through the CACFP, SFSP, or SSO.

- Written affirmation from participant, parent or guardian at the time of pick up that additional meals have not been received through the CACFP, SFSP, or SSO.
- Concentrating outreach and promotions to the community/geographic service area of the site where the meals are being distributed.
- Using home delivery for all sites.

Per Program regulations at 7 CFR 225.16(i), the Department may limit the use of non-congregate meal service options on a case-by-case basis. After reviewing submitted integrity plans, the Department may determine that a sponsor does not have the capability to operate or oversee a multi-day meal issuance at their sites and may establish a period shorter than the 10-calendar day period.

### **36. Can multi-day meal boxes include frozen foods?**

Yes. Frozen foods, which require minimal preparation other than heating, may be provided as part of meals if they meet meal pattern requirements. Providing foods in a frozen state may present a safe way to offer perishable foods for consumption later in the week (for example, four or five days after distribution).

### **37. When applying for the multi-day issuance flexibility, does a menu need to be included with the application for approval?**

Yes. The Department reviews menus using the multi-day issuance flexibility for the following:

- Meal pattern compliance; and
- Menus clearly indicate the food items; and
- Foods are creditable towards reimbursable meals under the SFSP; and
- Foods are recognizable as a meal component in a reimbursable meal; and
- A combination of the following meal quality standards:
  - Inclusion of fresh produce
  - A variety of entrees
  - Limiting juice to 2-3 times per week
  - A variety of fruits and vegetables are provided
  - Ultra-processed foods are limited
  - There is a combination of fresh, frozen, and shelf stable foods

Multi-day meal distributions must include the following with each multi-day meal packet:

- Daily dated menus; and
- Food safety instructions; and
- Written notification that by receiving the meals the recipient is ineligible to receive additional meals provided by CACFP, SFSP, or SSO.

The Office of Nutrition will work with each sponsor to provide technical assistance and opportunities for revisions of the menus during the application process. The Department may prohibit sponsors from using the multi-day issuance, on a case-by-case basis, if the Department determines that the sponsor does not have the capability to ensure Program integrity or protect the health and safety of children.

## **BULK FOOD ITEMS**

Bulk meal components refer to food items that are provided in a larger quantity than required for a single meal service, such as a gallon of milk or a full-size box of cereal.

### **38. Can we use bulk food items in multi-day meal boxes?**

Possibly. Approved self-preparation sponsors may provide bulk food items that meet the minimum amounts of each food component of a reimbursable meal breakfast, lunch, supper, or snack. Sponsors electing this option must ensure that:

- Required food components for each reimbursable meal are served; and
- All food items that contribute to a reimbursable meal are clearly identifiable; and
- Menus are provided and clearly indicate the food items and portion sizes for each reimbursable meal; and
- Food preparation, such as heating or warming, is minimal. Sponsors may offer food items that require further preparation only with Department and FNSRO approval; and
- The maximum number of reimbursable meals provided to a child does not exceed the number of meals that could be provided over a five-calendar day period. The Department may establish a shorter or longer time period, which may not exceed the time period for which the sponsor is approved for multi-day meal issuance, on a case-by-case basis.

### **39. Are there limitations when using bulk foods with multi-day issuance?**

Yes. Bulk meal programs should not exceed the number of meals that could be provided over a five- calendar day period. The Department may establish a shorter calendar day period on a case-by-case basis. The Department may also approve individual sponsors to provide up to 10 days' worth of bulk meals, also on a case-by-case basis. The Department will consider approving seven-day bulk meal menus when fluid milk is the only bulk food component provided.

### **40. Can a vended meal program use bulk foods?**

No. Vended sites cannot distribute bulk meal components.

### **41. We are providing half-gallons and gallons of milk with our multi-day issuance. Is this considered a bulk food item?**

Yes.

### **42. When applying for the bulk food item flexibility, does a menu need to be included with the application for approval?**

Yes. The Department may place limits on the food items or types of food items provided as part of bulk food distribution. The Department reviews menus using the bulk food flexibility for the following:

- Food safety instructions are included on the menus; and
- Meal pattern compliance; and
- Menus clearly indicate the food items; and
- Foods are creditable towards reimbursable meals under the SSO or SFSP; and
- Foods are recognizable as a meal component in a reimbursable meal; and
- The sponsor rounds up and provides the next full container size for retail products that do not meet the minimum amount needed for the menu; and
- Foods do not require the addition of other ingredients (aside from water) before eating; and
- Home preparation steps are included and require minimal preparation. Minimal preparation will include the following activities:
  - Microwaving or warming in the oven
  - Boiling water
  - Washing fresh produce
  - Cutting fresh produce
  - Assembling a sandwich
  - Opening cans or jars

The Office of Nutrition will work with each sponsor to provide technical assistance and opportunities for revisions of the menus during the application process. The Department may prohibit sponsors from providing bulk meal components, on a case-by-case basis, if the Department determines that the sponsor does not have the capability to ensure Program integrity or protect the health and safety of children.

## **PARENT OR GUARDIAN PICK UP**

Approved sponsors may distribute meals to parents or guardians to take home to their children. Sponsors electing this option must have documented procedures, submitted with their application, in place to ensure that meals are only distributed to parents or guardians of eligible children and that duplicate meals are not distributed to any child.

### **43. Can someone other than the child pick up the meal?**

Yes. Approved sponsors may distribute meals to parents, legal guardians, or designated guardians to take home to their children. Sponsors electing this option must have documented procedures, included in their integrity plans, to ensure that meals are only distributed to parents, legal guardians, or designated guardians of eligible children and that duplicate meals are not distributed to any child.

The 2023 Ohio Rural Non-Congregate Option Pilot found that many program participants were under the care of nonparent adults, older siblings, or home alone without transportation during the hours of meal service distribution or delivery. The Pilot also found that due to transportation costs and distance to meal sites, many times groups of families would pull resources to collect meals for one another.

The Department will define designated guardians as other individuals, such as caregivers,



babysitters, grandparents, or siblings, that have *documented* permission by the parent or legal guardian to pick up meals for the child. The designated guardian must maintain a direct caregiver relationship between themselves and a child. Individuals caring for groups of unrelated children formally enrolled in care, such as a child care facility, are not eligible for consideration as a designated guardian.

Program considerations:

- Children receiving meals through the CACFP are not eligible to receive duplicative meals through the SFSP or SSO. For example, child care centers or family home day care providers receiving reimbursement for breakfasts and lunches through CACFP are not permitted to pick up non-congregate breakfasts and lunches through the SFSP or SSO.
- When the needs of a particular community are greater than what can be met with the allowable adult pick up options, and if it is within the sponsor's capacity, then an additional site or home delivery meal options should be explored.

**44. If a parent or legal guardian designates another individual to pick up meals for their child, does that designated guardian need to be an adult?**

No. The designated guardian may be a sibling, family member, or babysitter that is under the age of 18. The designated guardian must maintain a direct caregiver relationship between themselves and the child and have *documented* permission by the parent or legal guardian to pick up meals for the child.

**45. How do I ensure meals are distributed only to parents, legal guardians, or designated meal guardians for eligible children?**

Sponsors electing to participate in the parent and guardian pick-up option must have documented procedures, included in their integrity plans, to ensure that meals are only distributed to parents, legal guardians, or designated guardians of eligible children and that duplicate meals are not distributed to any child. The Office of Nutrition will review integrity plans for a combination of the following suggested integrity measures for the parent and guardian flexibility:

- Children are present at the first meal pick up.
- Documentation is provided from the parent or legal guardian picking up the meals, confirming the child is part of the household, which may include:
  - Official letter or email from a school confirming student enrollment
  - Student ID cards
  - Individual student report cards
  - Attendance record from the parent portal of the school website
  - School yearbook identifying the student
  - Other official third-party records
- Requiring sign-in sheets of participants at the site and periodically cross-referencing them for sponsors with multiple sites in close or near proximity.

- Utilizing technology platforms to capture meal service participation, like QR codes, an online registration system, or other methods to electronically capture participation.
- Restricting meal service times to shorter periods.
- Requiring pre-registration and having names on rosters to confirm when meals are distributed.
- Issuing meal tickets, car tags, or other identifying markers, after the parent, legal guardian, or designated meal guardian relationship has been confirmed.
- Signed attestation at the time of pick-up that the individual picking up meals is the parent or legal guardian of the child, and the child is a member of their household.
- Limitations on the numbers of children an approved meal guardian may pick up a meal for.
- Clear and visible signage informing the community of the sponsors parent and guardian pick up policies.
- Additional methods established by the sponsor to verify accurate eligible participation with the Department's approval.

The Department may prohibit a sponsor from distributing meals to parents or guardians if it is determined that the sponsor cannot adequately ensure compliance.

**46. We are a small community. We would know if a parent picks up more meals than they have children in the household because we know everyone. Is this an adequate integrity measure for an open site?**

No. Open summer meal sites, including non-congregate sites, are open to any eligible child on a first come, first served basis. Familiarity with the community, while helpful, cannot replace having written integrity measures in place to ensure that meals are only distributed to parents, legal guardians, or designated guardians of eligible children and that duplicate meals are not distributed to any child. The Department may prohibit a sponsor from distributing meals to parents or guardians if it is determined that the sponsor cannot adequately ensure compliance.

**47. A parent was running late and asked a friend to collect meals for their child. The sponsor does not have documented permission from the parent or legal guardian for this individual to pick up the meals. Can the meals be provided to the neighbor?**

No. The designated guardian must have *documented* permission by the parent or legal guardian to pick up meals for the child. It is recommended that the Sponsor integrates technology, such as Microsoft or Google forms, within their parent or guardian pick up processes, to ease recordkeeping burdens and collect appropriate documentation prior to the meal distribution.

**48. An adult sibling arrives to collect meals for a child. The family is known to the Sponsor. The sponsor does not have documented permission from the parent or legal guardian for this individual to pick up the meals. Can the meals be provided to the sibling?**

No. The designated meal guardian must have *documented* permission by the parent or legal guardian to pick up meals for another child, even if the individual is known to the sponsor. It is

recommended that the Sponsor integrates technology, such as Microsoft or Google forms, within their parent and guardian pick up processes, to ease recordkeeping burdens and collect appropriate documentation prior to the meal distribution. Sponsors may include opportunities for a parent or legal guardian to designate a sibling as a guardian at the time of the initial registration and may designate more than one individual to serve as a guardian for purposes of meal pick up.

**49. A child arrives to collect meals for themselves and a sibling. The family is known to the Sponsor. The sponsor does not have documented permission from the parent or legal guardian for the sibling to pick up for another. Can the meals be provided?**

The child that is present may pick up meals only for themselves, provided it is an open site. For a closed enrolled site, the child receiving the meals must be enrolled in the Program. The designated meal guardian must have *documented* permission by the parent or legal guardian to pick up meals for another child, even if the individual is themselves an eligible child, related to the other child, and known to the sponsor.

It is recommended that the Sponsor integrates technology, such as Microsoft or Google forms, within their parent and guardian pick up processes, to ease recordkeeping burdens and collect appropriate documentation prior to the meal distribution. Sponsors may include opportunities for a parent or legal guardian to designate a sibling as a guardian at the time of the initial registration and may designate more than one individual to serve as a guardian for purposes of meal pick up.

## COUNTING AND CLAIMING

**50. Are daily point of service meal counts still required?**

Yes. The sponsor is still required to keep accurate daily meal counts, even when providing a multi-day issuance. Sponsors are encouraged to use the meal count sheets provided and must have processes and procedures in place to ensure accurate claiming. Claims may be submitted for the dates the meals are distributed. However, the sponsor must keep records of monthly meal counts for the dates the meals were intended to be consumed. The Department may request this information at any time. The Department reserves the right to take corrective action and disallow all meals observed to be in violation of the requirements.

**51. Can we claim second meals?**

No. Second meals are not allowed to be claimed as part of a non-congregate meal service.

**52. We had a lower turnout than expected. Do we have to throw away all the leftover food?**

It depends. Sponsors should plan, prepare or order meals with the intention of serving the approved meals per child during a meal service. When sites, including non-congregate sites, have leftover food, sponsors should update their systems to reflect actual site participation.

Sponsor policies relating to food donations must comply with State and local health and sanitation codes. To minimize food waste, consider these options:

- Transfer meals from one site with excess meals to another site with a shortage, if allowed by local health code.
- Designate a [“share table”](#) where children can return whole items they choose not to eat. Sponsors should discuss plans for a share table with their local health department prior to implementation.
- Donate to a nonprofit, such as a community food bank or homeless shelter, or send leftover food home with children. Donated meals sent home with children or to other nonprofit organizations are not eligible for reimbursement.

See USDA’s [Guidance on the Food Donation Program in Child Nutrition Programs](#) to learn more about donating program foods.

## MEAL QUALITY

### **53. We’re providing a seven day meal box. Can we still include fresh produce?**

YES! Summer is an excellent time to incorporate fresh produce of all kinds into meals, especially locally grown and seasonally available. When packaged thoughtfully, fresh produce items can be included in multi-day meal boxes for consumption earlier in the week. The [Child Nutrition Recipe Box](#) provides Child Nutrition Program operators with healthy and delicious meals that meet meal pattern requirements, are standardized to provide meal pattern crediting information, and feature recipes made with legumes, whole grains, and vegetables. View the Department’s [Local Foods Procurement](#) webinar and USDA’s [Procuring Local Foods](#) to learn more about purchasing fresh local foods for use in summer meal programs.

## RESOURCES AND ASSISTANCE

### **54. Where can I go to get additional information on the non-congregate meals?**

Current guidance from the United States Department of Agriculture (USDA) can be found on their [Rural Non-Congregate](#) webpage. The webpage includes resources, policy memos, webinars, and best practices for operating non-congregate summer meals.

For questions regarding the rural non-congregate option please contact [Elizabeth Douglass](#) or the Office of Nutrition at (800) 808-6325. Program sponsors may also contact their assigned education program specialist for additional assistance.

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