

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:

- At least one person at the sponsor level is required to attend a rural non-congregate training provided by the Office of Nutrition. Register on the [CRRS Training Management page](#). Registration will close the day before the training. A link to the webinar will be sent the day before.
- Update all staff training to include the non-congregate requirements.
- Include a food safety plan and the non-congregate service model with the required notification letter to the local public health department.
- Submit a [rural non-congregate integrity plan](#).
- Summer Food Service Program 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.
- Summer Food Service Program and Seamless Summer Option 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 in good standing may submit applications for non-congregate meal service plans for rural sites where no congregate meal service is available.

2. 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.

3. 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 Ohio Department of Education and Workforce (the Department) approval.

4. 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 determine how best to leverage community resources to provide a congregate meal service that meets the needs of children in non-rural areas.

5. 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.

6. 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 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 10-day period following their last congregate meal service day (provided that the 10 days are included in the

site's approved service period).

Along with the organized and supervised system the sponsor proposes to prevent overlap between meal services, the Department will consider the 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 of its applicable sites. Please note, the non-congregate option is not intended to replace congregate meal service.

7. 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\(h\)\(3\)\(iii\)](#). See policy memorandum [SFSP 15-2023, Best Practices for Determining Proximity of Sites in the Summer Food Service Program](#), for best practices for addressing site proximity.

MEAL SERVICE

8. How can sponsors provide non-congregate meal service in their communities?

Approved sponsors can 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 may include, but are not limited to:

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.

Meal pick-up: Packaged meals 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 located in an area-eligible and portioned to allow children to carry the food from the meal site to their home.

9. Can non-congregate meals use Offer vs Serve (OVS)

Program regulations allow School Food Authorities (SFAs) that are Program sponsors to permit a child to refuse one or more items that the child does not intend to eat under the “[offer versus serve](#)” option. 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. 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.

10. Are share tables permitted?

No. Share tables are not permitted in the non-congregate setting.

11. May State agencies limit rural non-congregate meal service options (i.e., multi-day meal issuance, parent/guardian pick-up, bulk meal distribution)?

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 that sponsor’s use of non-congregate meal service options. An example of this would be if the Department determines that the Program sponsor cannot adequately ensure the proper number of meals are distributed to each eligible child. 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.

HOME DELIVERY

12. Can we deliver meals directly to the student?

Yes. Program regulations require sponsors operating a non-congregate meal service which delivers meals directly to children’s homes to obtain written parental consent prior to providing meals to the children. 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. Non-SFA sponsors must enter into a written agreement or Memorandum of Understanding (MOU) with the local SFA if they wish to receive student data for identification and eligibility determination purposes. Sponsors may use the Limited

Disclosure Packet available in the Claims Reimbursement and Reporting System (CRRS) to request eligibility information from SFAs.

13. Can open sites use the home delivery option?

Sites using the home delivery option must be approved as closed enrolled.

14. 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. At a minimum, a full food service review must be conducted for each site within the first four weeks of operations. One method of conducting a food service review for sponsors using staff or volunteers for home delivery, could have a monitor riding along with the delivery vehicle to review the meal distribution. One method of conducting a review for sponsors using mail delivery service, could be for the sponsor to conduct a phone survey of participants on the day of delivery to ensure meals are being received, review the food production facility from where meals are shipped, and have a delivery sent to the sponsor to test for meal quality. Meals tested by the sponsor for meal quality are not reimbursable meals and may not be claimed.

15. Does the student 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.

16. Does the student receiving the home delivered meals need to qualify for free or reduced price meals?

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 closed enrolled site through area eligibility may only be used if the site is serving children that live in the area in which the site is located.

Sponsors providing home delivered meals must have internal measures to assure that meals are being provided to children in the community/geographic service area of the site where the meals are being distributed. Sponsors are not permitted to distribute meals state-wide from a single site.

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

17. 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 for a statement of understanding from the parent or legal guardian 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.

18. For home delivered meals, is each home considered a meal site?

No. 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. However, a child's residence is not considered a non-congregate meal site for Program monitoring purposes. For example, if meals are prepared and delivered from the high school, the high school would be considered the site.

19. 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.

MULTI-DAY ISSUANCE

20. 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 the proper number of meals are distributed to each eligible child.

21. 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, 4 or 5 days after distribution).

BULK FOOD ITEMS

22. Can we use bulk food items in multi-day meal boxes?

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 5-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.

23. 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. The 2023 Ohio Rural Non-Congregate Option Pilot found that program sponsors providing opportunities for participants to pre-register for meals experienced less food waste and were more easily positioned to accommodate dietary needs due to disability. Sponsors using 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 accommodation and to solicit feedback on the participants' food preferences to improve the meal service.

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 identify another household member or caretaker to pick up meals for the child registered (for example, an older sibling, grandparent, or babysitter)
- Sponsors may include a program integrity statement on the forms (for example acknowledgement of one meal box per child).

PARENT OR GUARDIAN PICK UP

24. Can someone other than the child pick up the meal?

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 applications, 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.

The 2023 Ohio Rural Non-Congregate Option Pilot found that many program participants were under the care of nonparent adults or home alone without transportation during the hours of meal service 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 program guardians as other adults, such as caregivers, babysitters or grandparents; or siblings, that have *documented* permission by the parent or legal guardian to pick up meals for the child.

Program considerations:

- Children receiving meals through the CACFP are not eligible to receive duplicative meals through the Summer Food Service Program or Seamless Summer Option. For example, childcare 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 Summer Food Service Program or Seamless Summer Option.

- 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.

COUNTING AND CLAIMING

25. 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 provided meal count sheets and must have processes and procedures in place to ensure accurate claiming. Claims are submitted for the dates the meal service is intended to be consumed, not the dates the meal service is distributed. For example, if a two day meal box is provided on July 31 then the sponsor would submit a July claim that includes the day of meals provided on the distribution date (July 31) and an August claim that includes the 2nd day of meals (August 1).

26. If a sponsor has leftover meals after the distribution, can the sponsor claim second meals?

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

RESOURCES AND ASSISTANCE

27. 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.