Navigating Non-Congregate SFSP: Site Caps

A **site cap** is the maximum number of meals that may be claimed at a given site by a Summer Food Service Program (SFSP) sponsor. The purpose of setting a site cap is to ensure that a site does not purchase and/or produce meals outside the capability of the site and the needs of the community. To maintain program integrity and ensure the site is meeting the intended purpose, site caps for rural non-congregate meal sites must accurately reflect the needs of the targeted rural communities being served.

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

To assess proposed site caps, **state agencies can utilize population data resources found in the Area Eligibility Mapper for CACFP and Summer Meals**. School data and/or Census data also provides data for area eligibility and estimates regarding the population of children in a particular area. Previous guidance on site caps can be found at SFSP 16-2015, *Site Caps in the Summer Food Service Program: Revised*, April 21, 2015.

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

How to Assess Requests for Site Cap Increases

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

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

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

On-Site Monitoring

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

Indicators of Potential Integrity Issues

1. **Proposed site caps not supported by data** - when site information sheets propose site caps that far exceed Census or school data, the state agency should ask for additional supporting information.
2. **Unreasonable meal counts -** when the site cap does not support the number of meals distributed.

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