Navigating Non-Congregate SFSP: Site Proximity

In the Summer Food Service Program (SFSP), **site proximity** refers to the minimum distance between approved sites, based on population density and accessibility to participants. Approval of multiple sites offering meal services at the same time to the same population of children can create potential integrity concerns. Site proximity must be considered when approving sites during the SFSP sponsor application process per 7 CFR 225.6(h)(1)(ii).

Considerations for Developing State Agency Policies

State agencies should develop policies regarding site proximity for congregate and non-congregate sites. Each proposed site must be evaluated individually and thoroughly by the state agency, and in the context of other sites serving the area. Previous guidance on proximity of sites can be found in SFSP 15-2023, *Best Practices for Determining Proximity of Sites in the Summer Food Service Program*, Sept. 28, 2023.

State agencies should consider the following factors relative to site proximity when reviewing applications:

The distance between all proposed sites and site location:

- Consider population density and the ability for participants to access the sites based on geography.
- If two proposed sites are in close proximity, request documentation to explain the need, which may include:
  - Any physical conditions or other barriers.
  - Public safety concerns.
  - Maximum distance someone might travel in a rural area; or
  - Adjacent site types are closed-enrolled or camps.
- Ensure that sponsors operating sites in close proximity have a way to contact each other to prevent possible meal duplication or building-in an obvious indicator of meal duplication. For example, color coding meal bags for different sites.

- Use mapping tools such as Capacity Builder, Google maps, Apple maps, or MapQuest to confirm site proximity for proposed sites.
- 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 duplicate meals are not served.

The population to be served:

- Require sponsors to provide detailed information on the population of children that will be served at each site.
- Generally, state agencies must ensure that the same population will not be served at more than one site.
    - Sites that appeal to specialized groups of children may include:
        - Specific age groups, such as when one site attracts primarily young children, while another site attracts primarily teens.
        - Children with special dietary requirements, such as kosher or halal meals.
            - While it is allowable to approve meal sites in close proximity that offer meals which attract different groups of children, any service institution may only serve two meals, or one meal and one snack, per child per day.

The meals that will be distributed:

- In approving sites that are in close proximity, state agencies must ensure that the same population of children are not receiving more than the maximum allowable meals (for most sites, two meals or one meal and one snack per day).

For example, if one site proposes to distribute breakfasts and lunches and another site in close proximity proposes to distribute suppers and snacks, the state agency must consider whether the sites are, for practical purposes, operating as a single site to serve meals in excess of the maximum allowed per child for a single day.

Meal service times:

- Consider restricting meal service times to reasonable or shorter periods instead of permitting extended or nearly all-day distribution times.
    - Sites in close proximity that have the same, or short meal service times, could help prevent children traveling to multiple sites and receiving duplicate meals.
    - In addition to preventing duplicate meals, this will help ensure that sponsors and state agencies can effectively monitor meal service times and conduct full reviews of the meal

service.

- Requiring sponsors that operate an open non-congregate site near a closed enrolled congregate site to schedule their meal service times to start and finish before the closed enrolled site's meal service ends, to prevent meal duplication.

On-Site Monitoring

On-site monitoring can uncover concerns with compliance regarding site proximity not captured in the application. If the state determines that a site is serving the same population of children that are already being served by another site in close proximity on a monitoring review, the state should provide technical assistance, require any corrective and fiscal action as needed, and then verify that the specified corrective action has been taken through a follow-up visit or some other manner. This could include shutting down a site's operation. If a state agency determines that a sponsor does not have the capability to operate or oversee non-congregate meal services at their sites, then the state agency can limit that sponsor's use of non-congregate meal service options as stated at 7 CFR 225.16(i) or deny their application to participate in the program.

Indicators of Potential Integrity Issues

1. **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.
2. **Open site types in close proximity -** adjacent sites are both open and restricted open without physical conditions that limit access.
3. **Extended meal service times -** sites in close proximity requesting to operate extended meal service times.

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