Navigating Non-Congregate SFSP: Parent or Guardian Pick-Up

In the Summer Food Service Program (SFSP), **parent or guardian pick-up** is a meal service option for which approved sponsors may distribute meals to parents or guardians to take home to their children. Per 7 CFR 225.6(c)(2)(xi) and 7 CFR 225.6(c)(3)(viii), state agencies are responsible for ensuring sponsor applications include procedures that document how meals are only distributed to eligible children and that duplicate meals are not distributed to any child in non-congregate areas.

State agencies should develop policies for parent or guardian pick-up that prioritize safeguarding program funds for their intended use while being mindful of operational burden to sponsors. As a reminder, state agencies are responsible for defining “guardian” for the purpose of non-congregate meal service. The definition should maintain a direct caregiver relationship between an adult and a child. Individuals caring for groups of unrelated children formally enrolled in care should not be considered guardians under the state agency’s definition.

Considerations for Developing State Agency Policies

Verification of participant eligibility and providing duplicate meals are two important integrity concerns for the parent or guardian meal service option. During the application process, state agencies must confirm sponsor procedures ensure that meals are distributed only to parents or guardians for eligible children. This could include requiring that children be present with the parent or guardian at the first meal pick up. Sponsors may also request documentation from the parent or guardian picking up the meals, either before or during meal service, such as:

- 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,
- Other official third-party records.

In addition to ensuring that meals are going to eligible children, sponsors must have effective procedures to prevent the issuance of duplicate meals, which may differ depending on site characteristics. Examples of procedures include:

- Requiring sign-in sheets of participants at the site and periodically cross-referencing them for sponsors with multiple sites in close 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 reasonable or shorter periods instead of permitting extended or nearly all-day distribution times, to ensure that sponsors and state agencies can effectively monitor meal service times and conduct full reviews of the meal service.
- Requiring pre-registration and having names on rosters to confirm when meals are distributed.

On-Site Monitoring

On-site monitoring can uncover concerns with compliance regarding parent or guardian pick-up not captured in the application. If program deficiencies are found during monitoring visits, State agencies 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. 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).

Indicators of Potential Integrity Issues

1. **Multiple pick-up locations at a single site** - duplication of meals due to one site offering multiple locations for parent or guardian pick-up without additional integrity measures.
2. **Distributing meals to unapproved adults -** sponsors allowing sites to distribute meals to proxies for multiple children.
3. **Solely using hashmark sheets -** sites using meal count forms that only collect the number of meals served (e.g. hashmark sheets, tally sheets, or clickers) without additional methods to verify accurate eligible participation.

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