

Module 2a – Closed Enrolled Site Eligibility and Operations Requirements

There are three modules that pertain to eligibility based on site type. Review the following information on closed enrolled sites to determine if your site is closed enrolled. If you operate more than one site type, you will need to review the modules for each site type, and answer the quiz associated with those modules.

Closed enrolled site

Closed enrolled sites serve meals only to enrolled children or an identified group of children, as opposed to the community at large.

Target Audience

- Designated Officials/Authorized Representative
- Summer Food Service Program Administrator

Estimated Time Required

20 minutes

Objectives

- Identify who is eligible to participate
- Determine the required documentation needed to qualify as a closed enrolled site in a needy or non-needy area
- Understand closed enrolled Site requirements

Tasks

- Read materials
- Review Web sites and resources
- Complete and submit online quiz

Participant Eligibility

Eligible participants in the SFSP include the following:

- Children 18 years of age and younger
- Persons 19 years of age and older who have a mental or physical disability and who participate during the school year in a public or private non-profit school program for people with mental or physical disabilities.

Meal Service Sites

A meal site can be located indoors or outdoors. Examples include:

- Colleges
- Churches
- Apartment complexes
- Boys & Girls Clubs, recreation centers
- Other locations where children congregate

Closed Enrolled Sites

Reasons for having a closed enrolled site are:

- Program provides cultural, religious, or other organized activities for a specific group of children
- Needy children living in a "pocket of poverty" within a wealthier area
- Low-income children who are transported to a congregate meal site in a non-needy area

Types of Closed Enrolled Sites

There are two types of closed enrolled sites:

- Needy (low-income) area
- Non-Needy area

Eligibility for Closed Enrolled Site

Closed enrolled site must establish eligibility either through area eligibility or through the individual income eligibility of the child attending the site.

Documenting Eligibility of Closed Enrolled Site in a Needy Area

A closed enrolled site may be established if it is located in the attendance area of a school in which at least 50 percent of the enrolled children are eligible for free or reduced-priced school meals. This is known as area eligibility. Area eligibility can only be used when the site is serving children who live in the area where the site is located.

The two primary sources of data used to determine if the site is eligible:

- School meal data—submit certification data every five years
- Census data—submit certification data every five years

Additional options to document closed enrolled site eligibility:

- Certification letter from a migrant organization—submit certification annually
- Population statistics from the Bureau of Indian Affairs (or tribal authority)—submit certification annually
- Housing Authority Letter—submit certification annually
- Other appropriate sources (contact the State agency for guidance)

Using School Attendance Area to Establish Area Eligibility

Sponsors must establish area eligibility based on the school **attendance area (not the nearest school)** in which the site is located.

The primary methods for obtaining the school's attendance area (i.e., boundaries, zones) are:

- Contacting the local school district directly
- Visiting the local school district's Web site

If the school does not qualify, please call your State agency office at 702-668-4584.

Obtaining School Meal Data

To obtain school meal data, contact the Department of Agriculture, Food and Nutrition Division or visit their website http://nutrition.nv.gov/Data Reports/Free and Reduced Lunch Data/.

To qualify sites, sponsors may use the free and reduced-price meal data from elementary, middle, or high schools as long as the site is located in the attendance area of the school. The meal data must demonstrate that 50 percent of the children enrolled in the school qualify to receive free and reduced-price meals. School meal data should be used first as this data is the easiest to obtain and document.

If the school's meal data is not available, you may request the following information from the school food authority. The school may provide the information on district letterhead or by sending an e-mail that includes:

- The name of the school that has jurisdiction over the address where the site is located
- The total number of children enrolled during the regular school year
- The number of children eligible to receive free or reduced-price meals
- The percentage of enrolled children eligible for free and reduced-price meals

There are certain situations that the school meal data may not accurately reflect the economic conditions in the surrounding area (e.g., schools that have charter or private schools, busing children outside of the area, school attendance choice, or no designated attendance area). These instances will require the sponsor to qualify the site in other ways as defined in the United States Department of Agriculture (USDA) Policy Memo that sponsors may obtain on USDA's Web page at http://www.fns.usda.gov/sites/default/files/SP06-2013os.pdf.

NOTE: The school food authority (SFA) is the governing body that has the legal authority and responsibility for the administration and operation of the school lunch program.

Documenting eligibility for a Closed Enrolled Site in a Non-Needy Area

Sponsors can establish site eligibility by:

- Obtaining written certification from the school food authority of the school district verifying the
 eligibility of enrolled children. Eligibility must demonstrate that at least 50 percent of the
 children enrolled in the program qualify for free or reduced-price meals
- Collecting annual income eligibility forms from children that are enrolled

Upward Bound Program Income Application

Upward Bound income applications may be used in lieu of the SFSP Camp and Enrolled Sites Income Eligibility Form to determine income eligibility of Upward Bound Program participants.

At closed enrolled sites with a combination of Upward Bound and non-Upward Bound participants, Upward Bound Programs may use their application and non-Upward Bound programs must use the SFSP Camp and Enrolled Sites Income Eligibility Form. Then the combination of income eligibility forms must meet the 50 percent eligibility criteria.

Income Eligibility Application Form

There are three ways to qualify for free meals utilizing the Camp and Enrolled Sites Income Eligibility Form: Categorical, Foster Child, or Household Income that is at or below the income eligibility scale or the National School Lunch Program reduced-price meal standards.

Completing the Camp and Enrolled Sites Income Eligibility Form

A sample income eligibility form and a sample letter to parents with income eligibility scale are located in the SFSP Administrative Guidance for Sponsors. An adult household member must complete and sign the form.

Site Monitoring Requirements

Sponsors must ensure compliance with the following minimum monitoring requirements.

1) Pre-operational Visits

Before sponsors begin meal service operations, they must visit:

- New sites to make sure that the sites have facilities to provide meal services for the number of children they expect to attend
- Returning sites that did not operate during the last program year
- Sites with key staff turnover (such as site monitors, site supervisors, administrators)
- Sites with operational problems, such as daily meal counting errors, serving incomplete meals, food safety and/or sanitation issues

Pre-operational Visits (continued)

Complete the Pre-operational visit worksheet for sites specified above.

Pre-Operational Site Visit Worksheet

(Attachment 13 – USDA Administrative Guidance Manual)

PRE-OPERATIONAL VIS	II WORKSHEET
Site name:	Site number:
Site address:	
Site telephone number:	
Person to contact for use of site:	
Type of site (check appropriate type):	
Recreation center	Park
School	Residential camp
Church	Dlay street
Church Playground	Play street Other
Flayground	Other
Settlement house	
Estimated number of children the site could serve:	
Estimated multiper of mandy children in con-	
Estimated number of needy children in area: Estimated number of personnel needed to adequately	14.6.1
Are the present facilities adequate for an organized m	neal service? Yes N
If answer is no, comments:	2000 210
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2) First-Week Site Visit

As a result of a recent policy change by the USDA, returning sponsors no longer have to conduct the First-Week visit for sites that operated successfully during the previous summer and had no serious deficiency findings.

First-Week site visits are still required for all new sites and any sites that experienced operational deficiencies during the previous summer.

PLEASE USE THE NEW FORM WHICH IS POSTED IN THE SFSP RESOURCE SECTION ON CNP.

3) Within the First Four Weeks

Sponsors must review **all sites** by the end of the fourth week of operation. After this initial period, sponsors must conduct a reasonable level of monitoring. If a site operates less than four weeks, the sponsor must still conduct this review.

PLEASE USE THE NEW FORM WHICH IS POSTED IN THE SFSP RESOURCE SECTION ON CNP.

4) Additional Site Visit Requirement

A sponsor administering year-round SFSP sites is required to complete an additional site review within six months of the fourth-week visit. Sponsors must not allow more than six months to lapse between reviews.

**NOTE: Monitoring must continue throughout the duration of the program at a level sufficient to ensure that sites comply with program regulations. The Site Visit forms are located in the USDA's Administrative Guidance Manual and the USDA's Monitors Guide. The USDA SFSP guidance materials are available on the USDA's SFSP Resource Web page under "Handbooks" at http://www.fns.usda.gov/sfsp/handbooks.

Media Release

The purpose of the "Media Release" is to announce the availability of free meals, the nondiscrimination policy, and complaint procedures if an individual wishes to file a complaint for violation of non-discrimination policy.

For closed enrolled site in non-needy areas, this requirement may be met by including the free meal announcement in the site's information packet or brochure provided to prospective participants.

For closed enrolled site in needy areas, sponsors must provide the media release to local media outlets such as newspaper, television/radio, or government Web sites where the SFSP site is located.

Camp and closed enrolled site media releases must include:

- Location of where meal will be served
- Start and end times of each meal service
- Income eligibility guidelines
- USDA civil rights nondiscrimination statement

The civil rights non-discrimination statement sponsors must is below:

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternate means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the <u>USDA Program Discrimination Complaint Form</u>, (AD-3027) found online at: http://www.ascr.usda.gov/complaint filing cust.html and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; fax: (202) 690-7442; or (3) email: program.intake@usda.gov

This institution is an equal opportunity provider.

Single-page documents that do not have space for the full nondiscrimination statement may contain the following shorter version:

This institution is an equal opportunity provider and employer.

Eligibility for Reimbursement

Sponsor must determine and document site eligibility before submitting a claim for reimbursement. Sponsors cannot claim any meals served at the site if the 50-percent eligibility requirement is not met.

Resources

For more information about eligibility, see the USDA handbook titled, "Administrative Guidance for Sponsors" on USDA's Web page at http://www.fns.usda.gov/sfsp/handbooks or in the SFSP resource section on the NDA CNP website https://cnp.nv.gov/

Health Department Notification

Regardless of whether the site is "self-prep" or "vended," all sponsors must notify their local health department of their intent to serve meals to children before beginning meal service operations. The notification must be in writing and include the following for all sites they plan to operate:

- Meal service location(s)
- Start and end date(s)
- Start and end time(s)

Type of meal service (self-prep or vended)

Sponsors must maintain a copy of the health department notification in their files and send a copy to the State agency with their SFSP renewal application. Failure to notify the local health department may cause loss of reimbursement.

Health Department Permits

- Facilities where meals are prepared must have a valid permit issued by the local health department.
- Local health departments may also require that the person renting/using the facility have a
 health permit in their own name.

Failure by sponsors to obtain proper kitchen permits may cause loss of program reimbursement.

Program Staff

Your summer food staff at the Department of Agriculture, Food and Nutrition Division are the best resources for questions you may have about SFSP requirements.

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