

# Module 2 – Open Sites Eligibility and Operation Requirements

There are three modules on eligibility based on site type. Review the following information on Open Sites to determine if your meal site is an Open Site. 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.

## Open Sites

Open Sites serve meals on a first-come, first-served basis to all children from the community at large. Sponsors of Open Sites must promote meal service and take the necessary steps to allow access to all children from the community.

## Target Audience

- Designated Officials/Authorized Representatives
- Summer Food Service Program Administrators

## Estimated Time Required

- 20 minutes

## Objectives

- Identify who is eligible to participate
- Determine the required documentation needed to qualify an Open Site
- Understand Open 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 or younger
- Persons 19 years of age or 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

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

- Parks, Pools, Playgrounds
- Community or Recreational Centers
- Churches, Libraries, Boys and Girls Clubs
- Schools, Migrant Centers, Housing Projects
- Other locations where children congregate

## Eligibility for Open Sites

An Open 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-price school meals.

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 Open Site eligibility:

- Certification letter from Migrant Education—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 your 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 attendance area (i.e., boundaries, zones) are:

- Directly contacting the local school district
- Visiting the local school district's Web site

If the school does not qualify, please call your State agency at 702-668-4581.

## Obtaining School Meal Data

The school meal eligibility data is available on the Nevada Department of Agriculture website at [http://nutrition.nv.gov/Data\\_Reports/Free\\_and\\_Reduced\\_Lunch\\_Data/](http://nutrition.nv.gov/Data_Reports/Free_and_Reduced_Lunch_Data/)

Sponsors may use data from more recent months when necessary to establish area eligibility.

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

If school data is not available, request the following information from the school district's food authority on either district letterhead or a copy of the email received from the district, which 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 data may not accurately reflect the economic conditions in the surrounding area (i.e., schools that have charter or private schools, busing children outside of the area, school attendance choice). Instances like these may require the sponsor to obtain meal data in other ways as defined in the United States Department of Agriculture Policy Memo that sponsor may obtain on USDA's Web page at <http://www.fns.usda.gov/sites/default/files/SP06-2013os.pdf>.

**NOTE:** The school food authority is the governing body, which has the legal authority and responsibility for the administration and operation of the school lunch program. Therefore, school meal data must be obtained from the school district or the Nevada Free and Reduced Eligibility Report.

## Open Sites in Close Proximity

Under most circumstances, sites cannot be located within easy walking distance from each other. However, for reasons of safety, heat, etc. there may be instances where sites are approved within close proximity to each other. Please consult the State agency for assistance.

For example, a barrier (such as a river or a freeway) which prevents children from getting to a site would be an acceptable reason for two sites to operate in close proximity.

If there is need for two sites to be approved near each other, the sponsors must:

- Schedule meals to be served at the same time to prevent children from going to more than one site for the same meal
- Limit the meal service period to prevent children from eating at more than one site



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 expected 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

Complete the Pre-operational visit worksheet for sites specified above

# Pre-Operational Site Visit Worksheet

(Attachment 13 – USDA Administrative Guidance Manual)

Attachment 13

PRE-OPERATIONAL VISIT WORKSHEET		
Site name: _____	Site number: _____	
Site address: _____		
Site telephone number: _____		
Person to contact for use of site: _____		
Type of site (check appropriate type):		
<input type="checkbox"/> Recreation center	<input type="checkbox"/> Park	
<input type="checkbox"/> School	<input type="checkbox"/> Residential camp	
<input type="checkbox"/> Church	<input type="checkbox"/> Play street	
<input type="checkbox"/> Playground	<input type="checkbox"/> Other	
<input type="checkbox"/> Settlement house		
Estimated number of children the site could serve: _____		
Estimated number of needy children in area: _____		
Estimated number of personnel needed to adequately control the food service: _____		
Is another site needed in this area? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Are the present facilities adequate for an organized meal service? <input type="checkbox"/> Yes <input type="checkbox"/> No		
If answer is no, comments: _____		
For the estimated number of children, does the site have:		
	Yes	No
Shelter for inclement weather?	_____	_____
Adequate cooking facilities (if applicable)?	_____	_____
Adequate storage for prepared or delivered food?	_____	_____
Storage space for records at site?	_____	_____
Adequate refrigeration?	_____	_____
Access to a telephone?	_____	_____
What type of organized activities are possible or planned at this site?		
_____		
_____		
Improvements or corrective actions needed before site operates:		
_____		
_____		
_____		
_____	_____	
Monitor's Signature	Date	

### **3) Within the First Four Weeks**

Due to recent USDA policy change, returning sponsors are no longer required to meet the First-Week Visit requirement for sites that operated successfully and without any serious deficiency findings during the previous summer.

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

Sites in good standing that are rolling over from the CACFP At-Risk Afterschool Meal Program are not required to have a First-Week Visit.

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

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 is within six months following the fourth week visit. Sponsors must not allow more than six months to lapse between reviews.

NOTE: Monitoring visits 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 NV CNP system in the SFSP resource section at <https://cnp.nv.gov/>

## Media Release

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

The Media Release must be provided to a local media outlet before beginning meal service AND submitted to NDA annually when providing required application packet updates. The sponsor must:

- Provide the media release to media outlets (e.g., newspapers, television and radio stations, city government web sites) serving the area where the SFSP sites are located. The information must have location of where meals will be served.
- List the start and end times of each meal service must be included in the media release.
- Distribute brochures, letters and door hangers to help communicate meal information to the community.
- Maintain a copy of the media release and other SFSP records.

- A civil rights non-discrimination statement must be included as follows:

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 [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](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](mailto: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.

## Banner Information

Sponsors may display a banner advertising the meal service. The banner does not need to specify what meals the sponsor is serving and does not need NDA approval for language.

- The banner should be large enough to be clearly visible from the street
- Hand-made or purchased banners are acceptable

## Suggested banner language:

- Free Breakfast, Lunch, Dinner or Snack for Kids
- Free lunch served to kids, Monday–Friday 1:30–2:30 pm
- Free lunch bunch
- Free time to crunch

Be creative! The purpose of the banner is to advertise the meal site to the community and encourage participation.

For additional ideas on promoting SFSP sites go to the USDA’s SFSP Toolkit Web page at <http://www.summerfood.usda.gov/library/toolkit.pdf>.

## Resources

For more information about eligibility, see the USDA handbook titled, “Administrative Guidance for Sponsors” at: <http://www.fns.usda.gov/sfsp/handbooks>.

## Health Department Notification

Regardless of the site being self-prep or vended, when sponsors have chosen their prospective sites they must notify the health department in writing of all site locations. Sponsors must also maintain a copy of the health department notification in their files.

The notification must include the following:

- 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 letter in their files and send a copy to the State agency with their SFSP renewal application. Failure to notify the local health department may result in loss of reimbursement.

## Health Department Permits

- Kitchens where meals are prepared must have a valid permit to use the facility.
- Local health department may also require that the person renting/using the facility have a health permit in their own name.

Failure to obtain proper kitchen permits may result in loss of reimbursement.

## Program Staff

Your summer food staff at the Food and Nutrition Division of the Nevada Department of Agriculture is the best resources for questions about SFSP requirements.

Diane Hogan, Nutrition Programs Professional

E-mail: [dhogan@agri.nv.gov](mailto:dhogan@agri.nv.gov)

Phone: 702-668-4582

Tammy Kratz, Program Officer

E-mail: [tkratz@agri.nv.gov](mailto:tkratz@agri.nv.gov)

Phone: 702-668-4584