



Food and Nutrition Service

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Food and Nutrition Service (FNS)

FROM: Janis Johnston  
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Food and Nutrition Service (FNS)

DATE: September 27, 2024

SUBJECT: Justification for adding a new data collection field, updates to which data are required, and updates to the instructions for FNS Form 905 approved under OMB Control No: 0584-0649, "FNS 905".

The Food and Nutrition Service (FNS) requests non-substantive changes to the FNS 905 form, approved under OMB Control No. 0584-0649 Summer Food Site Locations for State Agencies; expiration date December 31, 2025. Through this memorandum, we are requesting approval for the non-substantive changes to the FNS 905 data collection listed below. FNS does not believe that the current estimated completion time for this form of 7.5 minutes will be impacted by these non-substantive changes.

1. Add one new question to the FNS 905 to collect the Summer Food Service Program (SFSP) service model a site is using: congregate, non-congregate pick up, non-congregate delivery.
2. Add one new site-type, "conditional non-congregate," to the existing site-type options.
3. Change two fields that are currently optional to required.
4. Update the FNS 905 "Business Rules" instructions.

**Change #1: Add one new question to FNS 905 to collect the Summer Food Service Program (SFSP) service model a site is using: congregate, non-congregate pick up, or non-congregate delivery.** Until the summer of 2023, all summer meals had a "congregate" requirement, meaning all meals had to be consumed at the site. However, on December 29, 2022, Congress passed Public Law 117-328 giving FNS the authority to allow program meals to be served in noncongregate settings in rural areas. In 2023, FNS issued an Interim Final Rule, *Establishing the Summer EBT Program and Rural Non-Congregate Option in the Summer Meal Programs* that establishes regulations for the noncongregate meal option.

FNS uses the FNS 905 data to populate its [Summer Meals Site Finder](#), a resource for households to find SFSP and Seamless Summer Option (SSO) meal sites in their neighborhoods. The Site Finder map provides households with information on where these sites are located, and the new data will allow them to know whether the sites are congregated or noncongregated. Note that the new regulation also makes it mandatory for states to report summer site data using the FNS 905 and to update those data at least twice each year starting in Summer 2025.

**Change #2: Add one new site-type, “conditional non-congregate,” to the existing site-type options.** The current FNS 905 includes one data field where states identify the site-type based on a list in the instructions, e.g., whether a site is open to the public or is closed to enrolled participants. This change would add the new “conditional non-congregate” site-type to the list. Most SFSP and SSO sites operate in low income or “area eligible” locations. A “conditional noncongregate” site allows income eligible children to access summer meals in areas that would not otherwise be eligible in rural locations.

**Change #3. Require two fields that are currently optional.** There are two fields that are optional under the current instructions that will become required; days that the site operates and the program the site operates (i.e., SFSP or SSO).

**Change #4: Update the FNS 905 business rules instructions.** FNS will update the existing instructions to assist states in accurately reporting data on the form and to provide clarity on which information from the FNS 905 will be displayed on the map. For example, the business rules include information on how to report so households know the site type, and how to provide information that will help households know dates and times that sites are open.

If you have any questions regarding this request, please contact Christina Sandberg, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2337.

Attachments:

- Revised FNS 905 form