Non-Congregate Feeding: Summer 2024

mdek12.org





State Board of Education STRATEGIC PLAN GOALS



ALL Students Proficient and Showing Growth in All **Assessed Areas**

EVERY School Has Effective Teachers and Leaders





EVERY Student Graduates from High School and is Ready for College and Career

EVERY Community Effectively Uses a World-Class Data System to Improve Student Outcomes





EVERY Child Has Access to a High-Quality Early Childhood Program

EVERY School and District is Rated "C" or Higher







VISION

To create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens

MISSION

To provide leadership through the development of policy and accountability systems so that all students are prepared to compete in the global community





Summer 2023 Non-Congregate Meal Service in Rural Areas

Regulatory Authority



- SFSP 01-2023, SP 05-2024
- SFSP 07-2023, SP 14-2024
- Congress has established a permanent noncongregate meal service option for <u>rural areas</u> with <u>no</u> <u>congregate meal service available</u>.
- Non-Congregate available for SFSP and SSO

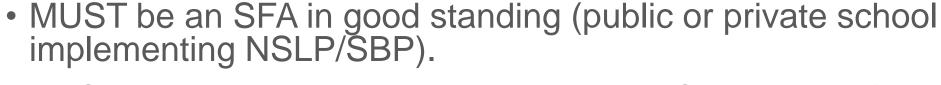


USDA understands the benefits of congregate meal service and encourages the continuation of congregate meal service when feasible.



Eligibility to Implement Non-Congregate

Which SFSP/SSO Sponsors can implement Non-Congregate Feeding?





- MUST be designated Rural area by USDA
- MUST ensure there are NO congregate meal services operating in your area
 - Think about schools AND community SFSP sponsors
- MUST meet definition of "area in which poor economic conditions exist"





Am I Area Eligible?



Am I Rural?



Are there other Congregate Feeding Sites In my Area?*



*NOTE: The USDA site finder will only show approved sites, not applications in progress. It is your responsibility to pay attention to other organizations in your area that might be offering Summer Meals in congregate setting





Non-Congregate Waiver Form

MUST be completed and approved by SA prior to non-congregate operations

Contact Person:	SFA Name:										
			Title:						ce Program regate Feeding		
Phone Number:									ogate / coaming		
Program Type: OSFSP OSS List of Sites Participating in N	SO	ate Waiv	ver:							Program pate Feeding	
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What does it mean to be "Non-Congregate"

What type of service delivery models will the SA approve?



- Grab & Go
- Curbside Pick Up
- Parent/Guardian Pick Up
- Bus Delivery
- Bulk Packaging (pick up or delivery)



What is Grab & Go?



- Eligible children from the community approach the site, take a meal home with them
- Eligible children participating in an academic summer school grab a meal on the way out the door, or as they are loading a bus
- The eligible child must be present to receive a meal unless a parent/guardian pick up has been approved



What is Curbside Pick Up?



- Same as Grab & Go, only difference is packaged/unitized meals are available for pickup from an exterior location like a carpool lane
- Cars "drive through" and pick up meals from CN workers
- Accurate POS / Meal count maintained
- Eligible children must be present in the car unless the SA has approved Parent Pick up



Bus Delivery (Door-to-Door)

What is Bus Delivery?



- Parents MUST opt-in for bus or door-to-door delivery
- SFA must verify the number of eligible children present in the home
- Meals can be left with adults or on the doorstep and counted for reimbursement as long as the first two conditions are met



What type of service delivery models will the SA approve?

- Family-delivered bulk meals or family pick-up.
- Bulk items contrast with pre-portioned unitized meals.
- Possible distribution of bulk items like milk gallons or sandwich ingredients.
- MSDH approval required for bulk or multi-day meal distribution.
- Limit of five days' worth of meals distributed at once.
- Distribution frequency must match the meal package size.
- Student presence required unless alternate pick-up methods are authorized.
- Sponsors need a verification system for correct meal distribution.



Is there a difference between "bulk items" and "multi-day meal issuance"? 14

What do these terms mean?

 Bulk items are large quantities of specific foods, more than needed for one meal.



- For instance, a bread loaf and luncheon meat can be given as bulk instead of in sandwiches.
- Unitized meals are pre-portioned and packaged as single servings; drinks may be separate.
- Multi-day meal issuance provides several days' meals at once, either as unitized or bulk.
- Example: A sponsor may offer five days of food on Mondays, either as separate meal units or bulk quantities meeting meal pattern requirements for quality maintenance.



What type of service delivery models will the SA approve?



- Applicable to Grab & Go or curbside services.
- Parents can collect meals for their children without the child being present.
- SFAs are required to keep a roster of eligible children.
- Only adults on the verified roster may pick up meals; unauthorized adults cannot collect meals if the child is absent.
- CN staff must be fully trained on these protocols.



Do I need a non-congregate waiver for my food truck?

It depends!



With Approved Non-Congregate Waiver:

- Children collect meals from the food truck and eat elsewhere, away from the supervisor's view.

Without Non-Congregate Waiver:

- Children must remain near the food truck to eat, supervised by the site staff.



How can you determine whether area has "No Congregate Meal Service" available?

Must know which sponsors/orgs are operating in your area

- Must ensure that the area the site proposes to serve is not <u>or will not</u> be served by a congregate meal service
- Must implement safeguards to prevent overlap between meal services to reasonably ensure children are not receiving more than the maximum allowance of SFSP meals per day Must follow the priority system
- When determining if an area is served by a congregate site, the SA will consider:
 - Any physical conditions or other barriers;
 - Limited capacity of a congregate site that prevents it from serving the community at large;
 - Sites serving the same children on different days, different weeks, or for different meals on the same day; and
 - Sites appealing to specific age groups or to children with unique dietary requirements.





Can a non-congregate site operate in close proximity to a congregate site that is closed enrolled or a camp?

Under Some Circumstances, YES!



- Non-congregate meal service can potentially be provided by sites that are in close proximity to congregate service sites, such as camps or closed enrolled sites.
- SA must ensure that the congregate and noncongregate sites will not serve the same population of children for the same meal service on the same day



Yes

With State Agency Approval





Which sponsors are eligible to participate in Non-Congregate Feeding?

Must be an SFA in Good Standing





 Non School Sponsors (community organizations implementing the SFSP) are not eligible for noncongregate feeding during the Summer of 2024

Can I serve non-congregate meals in non-area eligible areas?

If you take meal applications!



- Individual eligibility for free or reduced-price school meals may be determined by using individual eligibility determinations through school data or by the application process described in Program regulations (7 CFR 225.15(f)).
- Only meals served to children eligible for free or reduced price school meals may be claimed for reimbursement for non-congregate meals.

Are Camps eligible for non-congregate meal service?

No!



- Camps cannot offer non-congregate meal service if congregate meal service is available.
- As defined in 7 CFR 225.2, camps must provide a regularly scheduled food service as part of an organized program for enrolled children; such programming is generally understood to be congregate in nature.

Can a site provide a combination of congregate and non-congregate?

Yes. Non-congregate meals may be provided when congregate not available.

For instance:



- A site offering only breakfast as a congregate service could be authorized to serve lunch as a non-congregate option.
- A site providing breakfast and lunch on a three-day weekly schedule may receive approval for non-congregate distribution on off-days, including weekends.
- Should a site operate congregate services in July, it might get approval for non-congregate meals during the subsequent ten-day stretch post-last service day, assuming these days fall within the approved operation period.

Example of how to complete form if site if offering combination of congregate and non-congregate feeding

List of Sites Participating in Non-Congregate Waiver:

Site Name	Area	Rural	Meal Service	SELECT ALL THAT APPLY				
	Eligible		Type(s)	Grab	Curbside	Parent	Home /	Bulk
)			&Go**	Pickup	Pick Up*	Bus Delivery*	Delivery
Central High (serving B&L, but only L is non-congregate)	Yes▼	Yes▼	Lunch Only ▼	>				



Are sponsors required to follow established meal patterns?

Yes!



 Like congregate meals, non-congregate meals must comply with the meal pattern requirements for SFSP and SSO

Very important for non-congregate!



- Ensure food selections and packaging promote food safety
- Include instructions on at-home storage and preparation
- Must ensure non-congregate meal packages meet
 State and local health and safety requirements



Are there additional health/safety requirements for non-congregate?

Yes!



- Must prepare a food safety plan to ensure the meal service will be conducted safely
- All food service staff must be trained on Program operations, which include local health, food safety, and sanitation guidelines.



ICN provides a Food Safety for Summer Meals webpage for additional resources



Along with your Non-Congregate Waiver, you must submit a copy of food safety instructions that will be distributed with every noncongregate meal.

FOOD SAFETY INSTRUCTIONS:

- Consume or refrigerate all items immediately upon receipt.
- Cold items (such as milk) should be kept refrigerated at or below 40°F. If a cold item, at any point, exceeds 70°F it should be discarded immediately.
- Hot food must be re-heated to at least 135°F.
- Discard any leftover food after 2 days.

Thank you for choosing our school district's meal program. Please follow these instructions to ensure the safety and quality of your meals.



Requirements for Initiating Home Delivery

SFAs delivering directly to homes must:



- Identify and invite households of eligible children to participate in the meal delivery service
- Obtain written consent from the eligible child's parent or guardian that the household wants to receive delivered meals
 - could include hard copy, email, or other electronic means of communication
- Confirm the household's current contact information and the number of eligible children in the household to ensure the correct number of meals are delivered to the correct location
- Protect the confidentiality of participants and their households throughout the process



Example of parental consent form for home delivery of meals

PARENT CONSENT FORM FOR HOME / BUS DELIVERY OF MEALS THROUGH THE SFSP / SSO PROGRAM Dear Parent/Guardian, As part of our summer meal program, we are pleased to offer home/bus delivery of meals to eligible children in our school district who are 18 years of age and under. To ensure that we provide the correct number of meals to the correct location, we require written consent from the eligible child's parent or guardian. By signing this consent form, you acknowledge that you want to receive delivered meals for your eligible child/children who are 18 years of age and under. You also confirm your current contact information and the number of eligible children in your household. If you have children who are not yet school age and would like to receive a meal for them as well, please submit a copy of their birth certificate. School age children can be verified through district enrollment records, and no further action is necessary. Please fill out the information below and return this form to the address provided. The school district will protect the confidentiality of participants and their households. Thank you for your participation in our summer meal program. This institution is an equal opportunity provider. Sincerely, [School District Representative] [School District Name] [Contact Information] Contact Information City: _____ State: ____ Zip: ____ Number of eligible children in your household:_____ I give consent for the home/bus delivery of meals to the eligible child/children in my household who are 18 years of age and under. Signature:_____ Date:_____



Does the child need to be present for home meal delivery

No!



- The child does not need to be present at the time of delivery, as long as the sponsor has obtained the household's written consent to deliver meals and has verified the current address.
- If the meals are shelf-stable, no one need be present, as long as the address has been verified.
- Sponsors should consider state and local food safety requirements and best practices when designing their meal service.

Is additional funding available for meal delivery?

No!



- No additional federal reimbursement for home delivery or mobile meal delivery. However,
- Expenses related to meal delivery, such as postage or delivery service fees, would be considered an allowable cost under the SFSP or SSO.
- Delivery costs could also be paid with non-program funds such as State or local funds, or private donations.
- Standard reimbursement rates for SFSP (https://www.fns.usda.gov/sfsp/fr-010623) and SSO (https://www.fns.usda.gov/cn/fr-072622) remain in effect.



For Home delivery – is each stop (e.g. home) considered a site?

No!



 The SFSP site requirements, including site approval by the State agency, do not apply for individual homes, school bus route stops, or mobile meal route stops. The State agency and sponsor should consider the 'site' the non-congregate meal service operation overall.

Is the 2024 Home Delivery Model different from Mobile Meal Model from prior years?

Yes!



- Under the home delivery model for rural non-congregate meal service in 2023, SFSP site requirements do not apply since individual homes are not considered sites.
- The mobile meal model follows the definition of "site" outlined in 7 CFR 225.2. The mobile meal model is a type of congregate service that involves a sponsor delivering meals to an area, using a route with stops at approved sites in the community. The meal service is supervised, and all meals are consumed at the site, on the bus, or near the drop-off location



If a summer school wants to operate a non-congregate site, do they still have to be an open site?

YES!



• School districts may send students home with meals after summer school days. However, per SFSP/SSO rules, these summer schools must function as open sites. Therefore, if meals are provided to students at day's end, the school must also permit community children to receive Grab&Go or Curbside meals from the site.



If a child grab's the food and gets on a bus to go home, what is that?

Considered Grab & Go! Not Bus delivery!



- When a child picks up food from a location like a cafeteria and then boards a bus home, it's classified as Grab & Go, not as bus delivery.
- This service approach is expected to be widely used at summer school sites.
- It's important to note that even non-congregate academic summer sites are required to operate as open sites.



Are second meals reimbursable for non-congregate?

No!

 Sponsors may only claim one meal, per child, per meal for non-congregate meal service.





Some of them do...

Still Required



- Sponsors must specify meal service times within their application for SA approval, which may include approved pickup schedules or delivery times.
- Any alterations to meal service times also require SA approval.

Not Required for Non-Congregate

• It's not mandatory to serve breakfast in the morning nor to have a one-hour gap between meal services.



Are Sponsors required to announce the availability of noncongregate meals?



- Annual announcements are required
- Sponsors of congregate and non-congregate sites must announce the availability of free meals in the local media
- Sponsors should include in the announcement the days of delivery/pick-up when providing noncongregate meal service in rural areas



Do we display the AJFA poster at non-congregate sites?

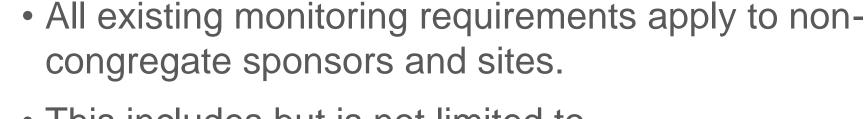


- The AJFA poster must be prominently displayed (such as in a window) on all vehicles making door-to-door drop deliveries at homes, and in all pick up facilities and locations
- Must ensure outreach strategies and meal service do not discriminate



What are SFSP monitoring requirements for Non-Congregate sites?

Same as they would be for congregate sponsors and sites





- This includes but is not limited to
 - pre-approval visits
 - sponsor and site reviews
 - follow-up reviews
 - meal preparation facility reviews by State agencies site visits and reviews conducted by sponsors



Are sites implementing non-congregate for the first time considered "new" for monitoring purposes?



- For Summer 2024:
- Sites transitioning from congregate to non-congregate models are treated as "new" sites.
- This includes sites adopting hybrid models (e.g., congregate breakfast and non-congregate lunch).
- Sponsors must visit all new sites within the first two weeks of program operations.
- Sponsors are also required to visit existing sites making this switch in Summer 2024.
- The USDA recognizes the advantages of congregate meal service and encourages its continuation when possible.



Will FNS or MDE collect data on non-congregate meals?



- Must submit an additional report to the SA
- Due by the 10th of the month along with the claim
- Required Data Elements
 - Total sponsors or SFAs operating only rural non-congregate sites,
 - Total sponsors or SFAs operating both rural non-congregate sites and congregate sites,
 - Total sites serving only non-congregate meals,
 - Total sites serving both non-congregate and congregate meals,
 - Total non-congregate meals, by meal service (breakfast, lunch/supper, snack).



Additional Monthly Reporting Requirement for Non-Congregate Meals





May a SA prohibit a sponsor from operating Non-Congregate sites?

Not for "non-congregate" status alone.





- Are not financially and administratively capable of operating a non-congregate meal service.
- Proposed one or more service areas already sufficiently served through a congregate meal service; or
- Proposed one or more service areas that do not meet the requirements for non-congregate meal service.



Gerardo Padilla

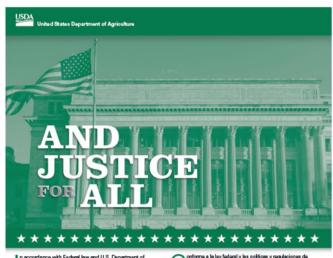
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