



# Rural Summer Non-Congregate Feeding Program

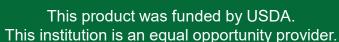
April 17, 2024

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TEXAS DEPARTMENT OF AGRICULTURE COMMISSIONER SID MILLER

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#### Overview of Today's Webinar

- 1. Background and Purpose of Non-Congregate Feeding
- 2. Sponsor and Site Eligibility
- 3. Meal Bundling and Parent Pick-up Flexiblities
- 4. Home Delivery Requirements
- 5. Hybrid Congregate/Non-Congregate Sites
- 6. Conditional Non-Congregate Sites
- 7. Application and Request Process
- 8. Monitoring
- 9. Miscellaneous Provisions
- 10. Wrap-Up





Background and Purpose of Non-Congregate Feeding

#### **Background**

- Interim Final Rule published December 29, 2023.
  - "Interim" means the regulations are now in effect, but public comments are being accepted and will be considered in a future rule update that will remove the "Interim" tag.
- Comments are due April 29, 2024.
  - Federal eRulemaking Portal: Go to <a href="https://www.regulations.gov">https://www.regulations.gov</a>. Follow the online instructions for submitting comments.
  - Mail: Send comments to Community Meals Policy Division, USDA Food and Nutrition Service, 1320 Braddock Place, Alexandria, VA 22314.
- Available to read:

https://www.federalregister.gov/documents/2023/12/29/2023-28488/establishing-the-summer-ebt-program-and-rural-non-congregate-option-in-the-summer-meal-programs

## Non-Congregate Then (Pandemic) vs. Now

SUMMER 2024 and Beyond	COVID-19
Increase participation in under- served areas where transportation barriers exist	Continue to feed children safely using social distancing
Available only in rural areas	Available nationwide.
Permanent regulation	Temporary waiver
A year and a half of preparation time, including a Pilot program in 2023	Guidance and policy changes occurred quickly.
Defined application process	Various online forms and reporting mechanisms.





Sponsor and Site Eligibility for Non-Congregate Feeding

### **Summary of Non-Congregate Requirements**

- Site must be in rural-designated area
- 2-mile proximity required from nearest site.
- New sponsors will be evaluated based on previous CNP experience
- Sponsor must be in good standing
- Switched SFSP sites will be considered "new"



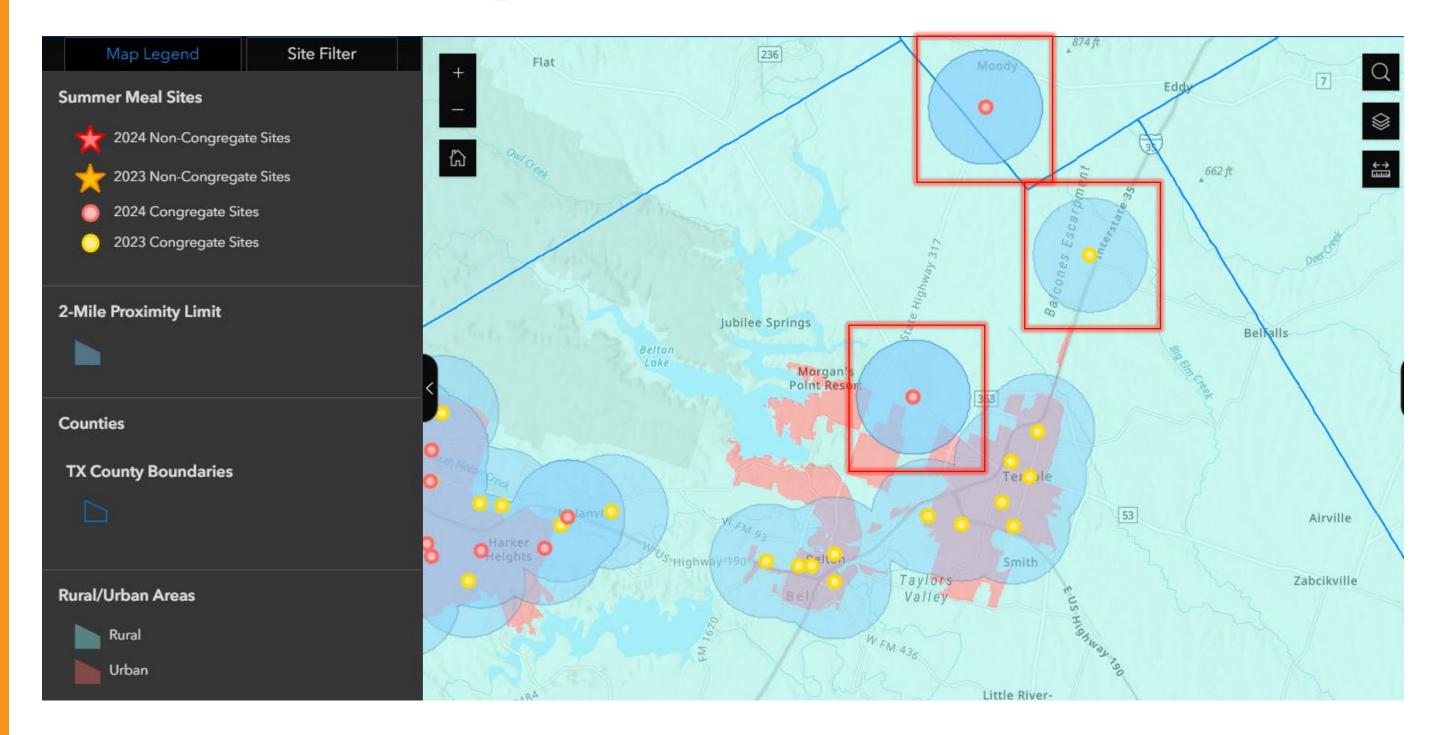
### **Documenting Rurality**

Non-congregate service **only** available to SFSP/SSO sites in rural areas:

- USDA has codified 6 different potential data sources that can determine the rurality of a site (7 CFR 225)
- TDA also using additional data source from last year to expand rurality even further
- Must verify rurality for **all** summer sites (using site mapper)
- TDA will track rural designation, which is good for only 5 years.



## **Summer Site Map – 2-Mile Proximity**



#### Summer Site Map – 2-Mile Proximity

Contact your ESC if you have any questions about the site mapper:

- Site reflects inaccurate description or location.
- If you plan on closing sites from last year to centralize a noncongregate service. Before doing this:
  - Research if participation will likely increase.
  - Consider impact of removing congregate sites.



#### **Sponsor/Site Eligibility**

- Previous CNP experience a plus!
  - Sponsors new to any Child Nutrition Program will have more rigorous application process.
- Sponsor must be in good standing
  - No outstanding corrective action or debt, not currently in the serious deficiency process
- All NC sites approved in 2023 must submit a new Non-Congregate request form.
- Switched SFSP sites will be considered "new"
  - Subject to sponsor pre-operational visits and first two weeks site visit





Meal Bundling and Parent Pick-up

# Meal Bundling\*

## Unitized meals:

- •Grab-and-Go (10-day max, 5-day recommended)
- •Home Delivery (5-day max)



\*Must adhere to maximum daily meal requirements. No more than two meals, or one meal and one snack, per child for each day of intended consumption. Lunch and supper not an allowable combination.

## 5+-day Grab-and-Go Distribution

- · If serving over 5 days, TDA requires:
  - Sample menus
  - Procedures on ensuring food safety

REMEMBER: Maximum 10-day distribution for grab-and-go unitized meals

## **Meal Bundling\***

- Bulk food component distribution
  - Means one or more food component is distributed in larger amounts (for example, a gallon of milk or loaf of bread)
  - Components can be assembled into individual reimbursable meals over a given period of time.
  - 5-day maximum bundle.



\*Must adhere to maximum daily meal requirements. No more than two meals, or one meal and one snack, per child for each day of intended consumption. Lunch and supper not an allowable combination.

## **Bulk Food Component Distribution**

### Packaging:

- Include labeled food items
- Instructions for assembling reimbursable meals.
- Preparation would require only adding water and warming to be served.
- UNALLOWABLE: Ingredients for recipes that require chopping, mixing, or baking.
- Extra food items are separated and labeled "not part of the reimbursable meal (if included)."

## **Bulk Food Component Distribution**

- •TDA requires with the NC request:
  - Sample menus
  - Instructions for meal preparation
  - Procedures for ensuring food safety

REQUIRED EVEN IF ONLY DISTRIBUTING MILK IN BULK.

# Meal Bundling\*

Pay attention to distribution days vs days of consumption:

- Allowable Scenario
  - Monday service (distributing 3 days of meals for Mon. Wed.) and
  - Thursday service (distributing 2 days of meals Thur. Fri.)
- Unallowable
  - Monday service (distributing 5 days of meals at a time) and
  - Wednesday service (also distributing 5 days of meals at a time)



## Parent/Guardian Pick-Up

- Parents or guardians may pick up meals without children present.
- Sites must have procedures in place to validate guardianship.
- •Only parents or guardians may pick-up meals on behalf of their children.

## Parent/Guardian Pick-Up

Preferred methods of proof of guardianship include:

- Official Letter/email from a school listing the children enrolled at a school campus
- Student ID cards
- Individual student report cards
- Attendance record from parent portal of the school website
- Birth certificate
- Official letter/email from facility or school listing children enrolled
- Other official ID cards (for example, IDs issued by a child care facility)

# Parent/Guardian Pick-up — Multi-Day Issuance — Procedures Required



Sites issuing more than one day of meals at a single distribution **and/or** utilizing the parent pick-up flexibility must upload procedures describing the safeguards put into place to reduce the risk of serving duplicate meals to children.

# Parent/Guardian Pick-up - Multi-Day Issuance - Procedures Required

Examples of methods to ensure that duplicate meals are not served include:

- Monitoring at the point of service.
- Sign-in sheets.
  - Cross-referencing sign-in sheets, such as for a sponsor with multiple sites in close proximity.
- Technology-based solutions, such as QR codes for sign-in sheets, or a registration system.
- Signage at the site warning participants not to take more than the allowable number of meals.
- Restricting meal service times to reasonable or shorter periods instead of extended or nearly all-day distribution times.
- Coordination with other nearby sites



**Home Delivery Requirements** 

#### **Home Delivery**

Sponsors offering home delivery must:

- Have means to identify and invite households of eligible children to participate in the meal delivery service
  - Private non-profits using school data must have MOU with the district.
- Obtain written consent from the eligible child's parent or guardian
- Protect the confidentiality of participants and their households
- Deliver no more than 5 days of meals at a time (unitized meals or bulk food component distribution).

#### **Home Delivery**

#### With the NC Request, the CE must provide:

- The site's means of obtaining parental consent.
- How the site will protect the privacy of household participants.
- The means for determining home eligibility.
  - Homes must be within a rurally designated area.
  - Homes served must either be in the attendance zone of an area eligible school, or
  - The child in the home qualifies for free or reduced priced meals.
- The means for ensuring food safety requirements are met.
- MOU with school district (if applicable).

#### **Parental Consent for Home Delivery**

## Required for parental consent:

- Home address,
- Phone number,
- Child(ren)'s name(s),
- Child(ren)'s age(s), and
- Language establishing both the presence of children in each household as well as the household's consent to receive meals.

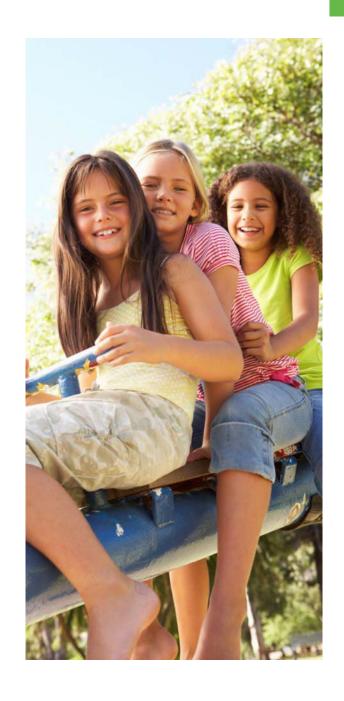
#### How to Document a Home Delivery Route

- Each route is a "site" and requires a single TX-UNPS Site Application and NC Request Form.
- Each house must be area eligible AND located in a rural area.



### **Mobile Route Requirements**

- Not home delivery children pick up G&G meals from the route stop.
- NEW THIS YEAR Each stop must meet individual site requirements
  - Individual site application and NC Request Form
  - 2-Mile proximity
  - All other SFSP/SSO requirements for a site.







Sites can provide both congregate and non-congregate service as long as the services do not overlap and duplicative meals are not served.

#### **Allowable:**

- Congregate meals M-F with non-congregate meals sent home on weekends.
- Congregate daily breakfast with NC lunches sent home each day.
- All children receive the same number and type of meals at distribution.

#### Not allowable:

• Summer school kids fed congregate meals daily while other children receive multi-day bundle.

- Sites must keep separate meal counts of congregate and non-congregate meals
- CEs must document their distribution schedules in the non-congregate request form



#### **Options for Summer School – Example 1**

#### **Allowable:**

- Summer school occurring Monday through Thursday
- Breakfast and lunch are served.
- Daily **congregate** meals for both summer school students and community children M-Th with three days of noncongregate meals (Fri-Sun) sent home on Thursday afternoon.
  - All children must eat onsite M-Th, even the community children.
  - This is considered a hybrid site.

#### Will this site be offering both congregate and non-congregate meals? \*

Sites may serve both congregate and non-congregate meals if those services (including days of intended meal consumption) do not overlap. All children must receive the same number and types of meals at each distribution.

#### Example:

- An allowable hybrid service would include congregate service provided Monday through Friday, with Saturday and Sunday meals being sent home with the children.
- An unallowable service would include distributing a bundle of 5 days of meals on Monday, while a subset of children receive daily congregate meals at the site.

Additionally, sites will be required to keep separate counts of congregate and noncongregate meals distributed and may be required to report those meal counts monthly to TDA.

Yes

O No

✓ Hybrid Attestation: I attest that by serving both congregate and non-congregate meals at this site, I must track the number of congregate and non-congregate meals distributed and may be required to report these numbers to TDA on a monthly basis. \* Example 1 – Hybrid site.

✓ Monday - CONGREGATE meal service will occur.		
Monday - Select CONGREGATE meal types distributed: *		
Which meal(s) will be served during Monday congregate service?		
✓ Breakfast; ✓ Lunch; ☐ Snack; ☐ Supper		
Tuesday - NON-CONGREGATE meal service will occur.		
▼ Tuesday - CONGREGATE meal service will occur.		
Tuesday - Select CONGREGATE meal types distributed: *		
Which meal(s) will be served during Tuesday congregate service?		
✓ Breakfast; ✓ Lunch; ☐ Snack; ☐ Supper		
Wednesday - NON-CONGREGATE meal service will occur.		
✓ Wednesday - CONGREGATE meal service will occur.		
Wednesday - Select CONGREGATE meal types distributed: *		
Which meal(s) will be served during Wednesday congregate service?		
✓ Breakfast; ✓ Lunch; ☐ Snack; ☐ Supper		

# Example 1 – Hybrid site.

Example 1 – Hybrid site.

✓ Thursday - NON-CONGREGATE meal service will occur.		
✓ Thursday - CONGREGATE meal service will occur.		
Thursday - Select NON-CONGREGATE meal types distributed: *		
Which meal(s) will be distributed on Thursday for non-congregate service?		
✓ Breakfast; ✓ Lunch; Snack; Supper		
Thursday - Enter number of days of NON-CONGREGATE meals distributed: *  How many days' worth of meals will be distributed on Thursday for non-congregate service?		
3		
Thursday - Select CONGREGATE meal types distributed: *  Which meal(s) will be served during Thursday congregate service?  ✓ Breakfast; ✓ Lunch; ☐ Snack; ☐ Supper		

# Example 1 – Hybrid site.

#### Meal Service Comment

If required, please enter any additional or clarifying information about the days and number of meals distributed as listed above.

For example, if days of distribution vary week to week, please provide a complete schedule of meal distribution days in the comment box below.

Congregate breakfast and lunch service will occur as normal on Thursday, but each child will receive on Thursday afternoon a bundle of three breakfasts and three lunches intended for Friday through Sunday.

## Options for Summer School – Example 2

#### **Allowable:**

- Summer school occurring Monday through Thursday
- Breakfast and lunch are served.
- Daily **non-congregate meals** for both summer school students and community children M-W with four days of non-congregate meals distributed on Thursday.
  - Community children allowed to take meals offsite.
  - Summer School students pick up the non-congregate packaged meals and return to classroom or other setting on Monday through Wednesday. While the students are eating together, these are considered non-congregate meals.
  - On Thursday, the Summer School students will receive a four-day bundle (Th-Sun.). They can pull the Thursday meals out of the bundle to consume onsite.
  - This is not considered a hybrid site. All children received the same packaged non-congregate meals.

#### Hybrid Congregate/Non-Congregate Sites

#### Will this site be offering both congregate and non-congregate meals? \*

Sites may serve both congregate and non-congregate meals if those services (including days of intended meal consumption) do not overlap. All children must receive the same number and types of meals at each distribution.

#### Example:

- An allowable hybrid service would include congregate service provided Monday through Friday, with Saturday and Sunday meals being sent home with the children.
- An unallowable service would include distributing a bundle of 5 days of meals on Monday, while a subset of children receive daily congregate meals at the site.

Additionally, sites will be required to keep separate counts of congregate and noncongregate meals distributed and may be required to report those meal counts monthly to TDA.

O Yes

No

If you select No, the form will intuitively not give you the opportunity to enter non-congregate meals.

## Example 2 – Non-Hybrid Site.

Monday - Select NON-CONGREGATE meal types di	stributed: *
Which meal(s) will be distributed on Monday for no	n-congregate service?
✓ Breakfast; ✓ Lunch; ☐ Snack;	Supper
Monday - Enter number of days of NON-CONGREG  How many days' worth of meals will be distributed service?	
1	
✓ Tuesday - NON-CONGREGATE meal service wil	occur.
Tuesday - Select NON-CONGREGATE meal types d	istributed: *
Which meal(s) will be distributed on Tuesday for no	n-congregate service?
✓ Breakfast; ✓ Lunch; ☐ Snack;	Supper
Tuesday - Enter number of days of NON-CONGREG How many days' worth of meals will be distributed service?	
1	
✓ Wednesday - NON-CONGREGATE meal service	will occur.
Wednesday - Select NON-CONGREGATE meal type	s distributed: *
Which meal(s) will be distributed on Wednesday for	non-congregate service?
✓ Breakfast; ✓ Lunch; ☐ Snack;	Supper
Wednesday - Enter number of days of NON-CONGR How many days' worth of meals will be distributed service?	
1	

# Example 2 – Non-Hybrid Site.

✓ Thursday - NON-CONGREGATE meal service will occur.
Thursday - Select NON-CONGREGATE meal types distributed: *  Which meal(s) will be distributed on Thursday for non-congregate service?  ✓ Breakfast; ✓ Lunch; ☐ Snack; ☐ Supper
Thursday - Enter number of days of NON-CONGREGATE meals distributed: *  How many days' worth of meals will be distributed on Thursday for non-congregate service?
Make sure you enter number of days in this field, <b>not number of meals.</b>

Example 2 – Non-Hybrid Site.

## Not allowable:

Summer school kids fed congregate meals daily while other children receive multi-day bundle for the week.

All children receive the same number and type of meals at distribution.

## **Conditional Non-Congregate Sites**

- Not open, not a camp, not closed enrolled (though very similar)
- Operates only in higher income areas.
- Must operate NC service.
- Reimbursement only for meals served to F/R children.
- Costs of non-reimbursable meals are unallowable.
  - If serving "paid" students, you will need to charge for those meals to cover the cost or allocate non-federal funds to pay for food intended for "paid" students or other non-Program participants.



#### **Conditional NC Sites**

- At time of application, if charging for meals, submit the H1506 form that includes charge policies and an attestation that hearing procedures are in place.
- At time of application, provide an estimate of number of F/R children to be served.
- Only available to school districts in Summer 2024.
- Must notify participants about availability of free meals and if a household application is required.
- When submitting a TX-UNPS application, you must submit the site name with the following naming convention: NC\_CON\_[Site Name]



#### **Conditional NC Sites**

Please contact your ESC if you are interested in being a conditional NC site.







## **Application Process**

- 1. CE uses mapping tool to determine if site is rural and meets proximity requirements.
- 2. TX-UNPS Site Application must be approved or conditionally approved by application team prior to applying for NC eligibility via the NC Request Form.
  - If applying as a conditional NC site, make sure NC\_CON\_[SiteName] naming convention is used.
- 3. CEs will be able to enter procedures directly into fields on the form or upload documents.
- 4. If approved for NC, update meal service times in the site application to match actual distribution times, if required (see next slide for more information).
- 5. Our application team will add NC designation to site name (NC\_H for approved hybrid sites).

#### **Documenting Meal Service Times when Meal Bundling**

- 1. In the TX-UNPS site application:
  - a. Indicate days for which meals are to be consumed (claimed)
  - b. If bundling meals, enter temporary, separate times for different meals (if serving breakfast and lunch, ensure the beginning of lunch is an hour after the end of breakfast).

NOTE: These times may not align with actual distribution times. See Step 3.

- 2. Submit your NC Request Form, providing more details about days of distribution.
- 3. If approved for NC, the application team will reach out to you to update the meal service times in TX-UNPS. If distributing breakfast and lunch at the same time, the site application should reflect the time that those meals are being distributed (meaning the times will be the same for both breakfast and lunch).



Select the Program you are operating in Summer 2024: *  Seamless Summer Option (SSO)  Summer Food Service Program (SFSP)
Distribution Method
Hybrid Congregate/Non-Congregate Sites
Meal Service Details
Parent/Guardian Pick Up
Duplicate Meals
File Uploads
Please upload all required documents using the file name formats provided. Following the naming conventions provided will help expedite application processing.

#### General Information

Select the Program you are operating in Summer 2024: \*

- O Seamless Summer Option (SSO)
- Summer Food Service Program (SFSP)

Select the CE and Site information requesting to operate non-congregate service . \*

If your CE and Site is not listed, type it in the displayed format and hit Enter.

Site name must be entered as it appears on the TX-UNPS Site Application and following the format: 00000-CE Name::0000-Site Name

#### Type to search then select the site requesting approval.

Select or enter value

00260-A PLUS CHARTER SCHOOLS, Inc. DBA A + ACADEMY::0001-A+ ACADEMY EL
00260-A PLUS CHARTER SCHOOLS, Inc. DBA A + ACADEMY::0002-A+ SECONDARY
SCHOOL
00261-A PLUS CHARTER SCHOOLS, INC. DBA INSPIRED VISION ACADEMY::0001INSPIRED VISION ACADEMY EL
00261-A PLUS CHARTER SCHOOLS, INC. DBA INSPIRED VISION ACADEMY::0002INSPIRED VISION ACADEMY SECONDARY
00579-ABBOTT ISD::0001-ABBOTT SCHOOL

IMPORTANT: Just because the site is listed does not mean it is eligible.

Just because a site is NOT listed does not mean it is *ineligible*.

Is this a school site requesting to operate a conditional non-congregate site in a non-area eligible area? \*

For conditional non-congregate site requests, NC\_CON\_ should be at the beginning of the site name listed, and your application should have been conditionally approved by TDA.

Yes

O No

#### Conditional Sites

By requesting to serve non-congregate meals at a school site in a non-area eligible area, you attest to the following:

- Only meals served to children who qualify for free or reduced-price meals can be claimed for reimbursement. \*
- ✓ Meals ineligible for reimbursement served to participants without a free or reduced-price classification must be paid for with non-federal funds. \*
- ✓ I certify that this site will collect and maintain information on participants' eligibility to support its claim for reimbursement. \*
- ✓ I understand that while I may use school data from the previous school year to qualify students for free or reduced-price meals, I must make the application process available to any child for whom there is no eligibility information. \*
- ✓ I will proactively notify eligible students' families about the availability of the program while avoiding overt identification of students who qualify for free or reduced-price meals. Notification will include copies of hearing statements and, if charging "paid" eligible students, charge policy statements, as provided below in this form. \*
- ✓ I understand that if I do not meet the requirements in this application, TDA will deny this request and return the application. Prospective applicants will have a chance to correct the issues with this site form and re-submit for this site or another site. \*

Please estimate the number of free and reduced-price eligible children expected to be served at this site daily. \*

## Non-Congregate Request Form

Will this site be charging students who are not eligible for free or reduced-price meals? \*





If charging for meals, you must attest to the following:

- ✓ The eligibility standards qualifying students for free meals conform to the Secretary's family size and income standards for reduced price school meals. \*
- If a family requests a hearing, the child will continue to receive free meals until a decision is rendered. \*
- ✓ There will be no overt identification of free meal recipients and no discrimination against any child on the basis of race, color, national origin, sex (including gender identity and sexual orientation), age, or disability. \*

#### **Charge Policy and Hearing Statement**

Complete and upload Form H1506-A (located on the <u>Summer Meals</u> <u>Administration/Forms page</u>).

This standard TDA form requires that all conditional non-congregate sites attest that they have hearing procedures in place as well as a payment collection methodology that will prevent overt identification of children receiving a free meal.

For uploads, please use the document upload box at the end of this form.

#### Select the method of non-congregate feeding. \*

Note: Only one non-congregate method is allowed per site. For example, if operating a home delivery method and a grab-and-go site, these must be two separate sites with two separate site applications.

- Grab-and-Go at central site
- Home Delivery

## Non-Congregate Request Form

Are you a Private Non-Profit relying on school district data to identify participants? \*

O Yes

No

Select how you will provide your procedures/methods for obtaining parental consent to deliver meals to households. \*

Procedures must include how you will protect the confidentiality of these households.

A file upload is preferred.

- Text entry
- File upload

Distribution Method

#### Select the method of non-congregate feeding. \*

Note: Only one non-congregate method is allowed per site. For example, if operating a home delivery method and a grab-and-go site, these must be two separate sites with two separate site applications.

- Grab-and-Go at central site
- Home Delivery

#### Will this site be distributing food components in bulk?

Bulk food component distribution is a strategy for packaging multiple components (for example, a gallon of milk, a loaf of bread) that can easily be assembled into a multiple meals and require no more than warming to be eaten.

Note that pre-plated, unitized meals are not considered bulk packaged food.

Note also that if distributing items in bulk, the site may only distribute up to 5 days of meals at one time and must submit sample menus and procedures for ensuring food safety later in this form.

Yes

- O No
- Bulk Components Attestation: I attest that by opting to distribute food components in bulk, this site cannot deliver more than 5 days of meals at one time. \*

Will this site distribute more than one day of meals at a single distribution? *
Yes
○ No
Will this site be providing more than 5 days of meals at a single distribution? *
Regulations allow for a maximum distribution of 10 days of meals at a time. Any distribution of over 5 days of meals at a time requires an upload of a sample menu and procedures for ensuring food safety.
Yes
○ No
Select how you will provide distribution procedures. *
If you are distributing food components in bulk OR distributing more than 5 days of unitized meals at a single distribution, you must upload procedures for how those meals will be safely distributed and/or prepared.
Procedures should include:
<ul> <li>a sample menu,</li> <li>how the CE will adequately address food safety concerns with families; and</li> <li>instructions to families of how to assemble bulk food components into reimbursable meals, if applicable.</li> </ul>
Refer to the Summer Non-Congregate page on SquareMeals.org for more information on these flexibilities.
A file upload is preferred.
O Text entry
○ File upload

Meal Service Details

Please select the days of distribution, type of distribution, number of days' worth of meals distributed at each service, and type of meals distributed at each service.
Note that meals must be distributed during the times listed on your site application, and meals may only be claimed for the days listed in the site application.
Sunday - NON-CONGREGATE meal service will occur.
Sunday - CONGREGATE meal service will occur.
Monday - NON-CONGREGATE meal service will occur.
Monday - CONGREGATE meal service will occur.
Tuesday - NON-CONGREGATE meal service will occur.
Tuesday - CONGREGATE meal service will occur.

Parent/Guardian Pick Up

Will this site utilize the flexibility allowing a parent or guardian to pick up non- congregate meals without a child present? *
O Yes
○ No
As applicable, select the methods this site will use to identify an adult picking up a meal as a parent or guardian of an eligible child (check all that apply): *
Scan children's meal cards or ask for children's personal identification numbers used for meal service;
<ul> <li>Request children's names, ages or dates of birth, or grade levels when meals are picked up;</li> </ul>
<ul> <li>Request children's school names or a copy of school correspondence when meals are picked up;</li> </ul>
Provide parents/guardians with rearview mirror hangers, placards, or QR codes;
<ul> <li>Post signage to indicate who is eligible to pick up and receive meals;</li> </ul>
<ul> <li>Other methods to ensure meals are distributed only to parent/guardians of eligible children</li> </ul>

#### Duplicate Meals

Select how you will provide a description of the method to be used to reduce the risk of duplicate meals. \*

Based on previous responses, this site is utilizing multi-day issuance and/or the parent/guardian pick-up flexibilities.

Enter or upload procedures describing safeguards put into place to reduce the risk of serving duplicate meals to children. Such procedures could describe monitoring, signin sheets, signage at the site, or other site set-up factors that ensure that participants are receiving no more than the maximum allowable meals.

File upload is preferred.

- Text entry
- File upload

#### File Uploads

Please upload all required documents using the file name formats provided. Following the naming conventions provided will help expedite application processing.

Following the naming conventions provided will help expedite application proces
Payment Method file upload is complete. *
File name format: CE#_Site#_PaymentMethod
Hearing Procedures file upload is complete. *
File name format: CE#_Site#_HearingProcedures
Memorandum of Understanding file upload is complete. *
File name format: CE#_Site#_MOU
Parental Consent file upload is complete. *
File name format: CE#_Site#_ParentalConsent
Distribution Procedure file upload is complete. *
File name format: CE#_Site#_DistributionProcedure
Ouplicate Meals Procedure file upload is complete. *
ile name format: CE#_Site#_DuplicateMeals

## **Visits Prior to Approval**

Regulation requires TDA to select some NC sites for a preapproval visit. Compliance teams will select a certain number of sites to review based on the flexibilities chosen and the history of the CE.





Monitoring





## **SFSP Monitoring**

- All regulatory monitoring requirements and timeframes are still in place.
- All sites switching to NC from congregate are considered new, which means the following reviews are required:
  - Pre-operational visit
  - First two weeks site visit
- All SFSP sites require a full site review within the first four weeks of operation (first two weeks visit and full site review can happen at the same time).



## **Pre-Operational Visit Prototype Form**

#### Summer Food Service Program Site Name: Site Contact Name: Site Address: Telephone: Additional questions if the site is approved to serve non-congregate meals: Yes No Types of Site: ☐ Resider ☐ Recreation Center Adequate packaging for distributing off-site meals? ☐ School ☐ Play str ☐ Church □ Playgro Distribution schedule aligns with information submitted to TDA on Non-Congregate ☐ Park ☐ Settlen Parker and a complete of all the control at a Request Form? If home delivery, parental consent obtained for each household on the route? If home delivery, each house verified to be in a rural area? If distributing food components in bulk, have menus and sample instructions been developed? If issuing multiple days of meals and/or allowing for parent/guardian pick-up of meals, is the site following procedures submitted to TDA to prevent duplicate meal service and, if applicable, verifying guardianship of the adult?



## First Two Weeks Site Visit Prototype Form

#### Sample First Two Weeks Site Visit Form

Summer	Food S	ervice	Program
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Site Contact Name:	Date of Site Visit:	Monitor	's Arrival 1	ime:	
Areas for discussion:  Has the site supervisor attended training session?  Are meals being counted and signed for?  Are all required records being completed?  Are congregate meals served as second meals	Site Name:			:	Site Nu
Areas for discussion:  Has the site supervisor attended training session?  Are meals being counted and signed for?  Are all required records being completed?  Are congregate meals served as second meals	Site Contact Name:				Title: _
Areas for discussion:  Has the site supervisor attended training session?  Are meals being counted and signed for?  Are all required records being completed?  Are congregate meals served as second meals	ite Address:				
Has the site supervisor attended training session?  Are meals being counted and signed for?  Are all required records being completed?  Are congregate meals served as second meals		1.			
Are meals being counted and signed for?  Are all required records being completed?  Are congregate meals served as second meals	Discussion with site staff (list na	ames):			
Are all required records being completed?	-	ames):			Yes
Are congregate meals served as second meals	Areas for discussion:				
	Areas for discussion: Has the site supervisor attende	ed trainin	g session?		
excessive?	Areas for discussion:  Has the site supervisor attended  Are meals being counted and s	ed training	g session? ?		

Areas for discussion if a No	on-Cong	gregate S	ite
Adequate packaging for distributing off-site meals?			
Distribution schedule aligns with information			
submitted to TDA on Non-Congregate Request Form?			
If home delivery, parental consent obtained for each			
household on the route?			
If home delivery, each house verified to be in a rural			
<mark>area?</mark>			
If distributing food components in bulk, are			
appropriate menus and meal assembly instructions			
being sent home with bundles?			
If issuing multiple days of meals and/or allowing for			
parent/guardian pick-up of meals, is the site following			
procedures submitted to TDA to prevent duplicate			
meal service and, if applicable, verifying guardianship			
of the adult?			
If operating both congregate and non-congregate			
service at the same time, is the site ensuring that the			
two different services occur at different times and			
that the days and times of intended meal			
consumption do not overlap between the two			
services?			



## **SFSP Site Review Prototype Form**

completed during the first four week gate and non-congregate service.	•	Is site serving both co	ngregate and non-con	gregate means: 🗀 Yes	<u> </u>	
Sponsor:		Type of non-congrega	<mark>te service: 🗌</mark> Grab-an	<mark>d-Go Meal Pick-up 🏻</mark>	Home Delivery	
Site Contact Name:		Types of meals review	red:			
Site Address:				·		
Date of Visit:		☑ Breakfast	☐ AM Snack	☐ Lunch	☐ PM Snack	☐ Dinner
			Congregate	Congregate	Congregate	Congregate
Monitor's Arrival Time:		□ Non-Congregate	□ Non-Congregate	□ Non-Congregate	□ Non-Congregate	■ Non-Congreg
<u> </u>	<u> </u>	service.				
		Moal types included in	n oach non-congregat	a bundlar		
		Meal types included in  ☐ Breakfast	n each non-congregate	e bundle:	☐ PM Snack	☐ Dinner
			☐ AM Snack	☐ Lunch	□ PM Snack	<mark>□ Dinner</mark>
		☐ Breakfast	☐ AM Snack	Lunch	<u></u>	



## **SFSP Site Review Prototype Form**

#### Site Review Form – Non-Congregate

#### **Summer Food Service Program**

To be completed during the first four weeks of operation. This form can be used if the site is operating both congregate and non-congregate service.

Sponsor:  Site Contact Name:  Site Address:  Date of Visit:  Monitor's Arrival Time:		Site:  Title:  Telephone:  Site Supervisor:  Monitor's Departure Time:					
				□Open Site	☐ Closed Enrolled	☐ Camp Site	☐ Conditional Non- Congregate Site

#### Meal Service

Are accurate meal counts taken of meals served, including separate counts for non-congregate and congregate meals, if applicable?

If operating a hybrid site, were congregate and non-congregate meals served on the same day?

If Yes to the previous question, did the site ensure that both services did not overlap and that the meal types distributed were different at each service?

Has the site adequately communicated to the community the schedule of non-congregate service (and congregate service, if applicable)?

Are sites adhering to the meal service days and times of distributions indicated in the site application and approved non-congregate request form?

Do the days of intended consumption of non-congregate meals align with the days of service indicated in the site application?

Do bundled meal packages adhere to maximum allowable number of meals distributed to each child per day?

If bundling unitized meals, are the meals packaged individually with a method for participants to be able to identify which meal types are being provided?

Are sites ensuring that second non-congregate meals or bundles are **not** being distributed?

If applicable, is the site ensuring that second **congregate** meals are not being served in excess?

If allowing parents or guardians to pick up meals, is the site adhering to the procedures submitted to TDA for verifying guardianship?



## **SFSP Site Review Prototype Form**

#### Site Review Form – Non-Congregate

#### **Summer Food Service Program**

To be completed during the first four weeks of operation. This form can be used if the site is operating both congregate and non-congregate service.

Sponsor:		Site:					
Site Contact Name:  Site Address:  Date of Visit:  Monitor's Arrival Time:		Title: Telephone: Site Supervisor: Monitor's Departure Time:					
				□Open Site	☐ Closed Enrolled	☐ Camp Site	☐ Conditional Non- Congregate Site

#### Bulk Food Component Distribution (Complete if applicable) Is the site limiting distribution to no more than 5 days at a time? Is the food provided such that only minimal preparation (such as warming in a microwave) is required? Were menus and instructions provided to the participant that describe how to prepare food items and portion out the food components for each intended day of consumption? Home Delivery (Complete if applicable) Is the site limiting distribution to no more than 5 days at a time? Is there a record of how many eligible participants are in each home and how many meals were provided per delivery? Are there written consent forms correctly filed and recorded for every program participant? Is the site adequately protecting household information? Did the meal driver follow the intended delivery route? Is each household located in a rural-designated area per TDA's Non-Congregate Eligibility Site Map? If using school data, is there documentation of the MOU between the site and school food authority? Conditional Non-Congregate Sites (Complete if applicable) Is the site accurately counting separately the reimbursable meals served to free or reduced-price eligible children and non-reimbursable meals served to paid-eligible children and Program/non-Program adults? Is the site charging for non-reimbursable meals served to children ineligible for free or reduced-price meals? If the site is **not** charging for meals served to non-Program adults or children, are the costs of those meals being paid for with non-Federal



#### **SSO Site Review Form**

## SCREENSHOT UNAVAILABLE

Form to be released early May



## **Best Practices for Monitoring NC Sites**

- Observe meal packaging;
- Observe meal pickup or delivery, as applicable (including accompanying personnel on delivery routes)
- Ensure meal pattern requirements are met.
- Proper implementation of bulk food component distribution, if applicable;
- Ensure meal distribution times are followed as stated on the site application;
- Ensure appropriate number of meals are distributed and counted;
- Ensure local health, food safety, and sanitation standards are followed; and
- Ensure the "And Justice for All" poster is properly displayed at pickup sites and civil rights requirements are met.











#### **Miscellaneous Provisions**

- Second meals are NOT reimbursable when serving non-congregate meals.
- Offer vs Serve is allowable, but only for School Food Authorities per regulation.
- Civil Rights data must be obtained once per summer.
- NC sites must be able to provide meal modifications for participants with disabilities
- And Justice for All posters must be displayed prominently at the site
- Site cap requirement remains for both congregate and noncongregate meal service.





Wrap-up





# Summer Non-Congregate 2024 Please Visit:

https://squaremeals.org/Programs/Summer--Meal-Programs/Summer-Non-Congregate-Feeding-Program

- FAQs Updated as necessary
- Non-Congregate Request Form
- NC Eligibility Site Map
- Webinars and Presentation Slides

## Summer Non-Congregate 2024 Coming soon!

- New congregate/non-congregate meal count forms
- Method for reporting congregate and NC meals claimed (Hybrid sites only)
- Updated SFSP Pre-Operational Visit, First Two Week Site Visit, and Site Review Forms
- Updated SSO Site Review Form
- Participant Notification Template for Conditional NC Sites

## Summer Non-Congregate 2024 Prepare! Prepare! Prepare!

- Determine number of days to serve
- Develop procedures
  - Identifying parent/guardian
  - Preventing duplicate meals
  - Food safety, if using home delivery, delivering more than 5 days of meals, or distributing components in bulk
  - Protecting family confidentiality (home delivery)
- Develop sample menus, if planning to distribute more than 5 days of meals at one time or distributing components in bulk.
- Determine service options and days of service
- Determine optimal site locations.

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To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <a href="https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf">https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf</a>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or

#### 2. fax:

(833) 256-1665 or (202) 690-7442; or

#### 3. email:

program.intake@usda.gov

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