

Rural Non-Congregate Service in the 2023 SFSP



Agenda

> 2023 Rural Non-Congregate Overview
 > Applying for Non-Congregate Meal Service
 > Monitoring Requirements
 > Reporting Requirements
 > Questions?





Non-Congregate Meal Service in Rural Areas

- The Consolidated Appropriations Act, 2023 (P.L. 117-328) established a permanent non-congregate meal service
- Option for rural areas with no congregate meal service available
- Option for SFSP or SSO operations



Am I Eligible For Non-Congregate Meals?

- Must be an approved SFSP Sponsor in good standing
- Sites must be in rural areas
- Sites are established where congregate service is unavailable
- Open non-congregate sites must be area eligible either by school or census data
- If the rural area is not area eligible, reimbursement can only be received for children who qualify for free/reduced price meals
 - Rural meal delivery may be an option to consider





Establishing Eligibility



Rural Determination

Non-Congregate service is for **rural areas only**

- We must use approved data sources to determine rural status
 - USDA Rural Designation Map <u>https://www.fns.usda.gov/rural-designation</u>
- If an area is not rural on the FNS Rural Designation Map, does that mean it is not eligible for non-congregate meal service?
 - No, we can look for rural pockets



Sites operating in the purple non-rural counties require further USDA approval.

- Sagadahoc
- Androscoggin
- York
- Cumberland
- Penobscot





Rural Pockets in Non-Rural Counties

With USDA approval, the following sources can be used by DOE Child Nutrition to determine rural pockets:

1) NCES Mapper – green rural areas 41, 42, or 43 https://nces.ed.gov/programs/maped/LocaleLookup/

2) Rural Urban Commuting Area (RUCA) Codes 4-10 https://www.ers.usda.gov/data-products/rural-urban-commutingarea-codes/

3) If RUCA is 1-3 we can try:

- Rural-Urban Continuum Codes (RUCC) 4-9
- Urban Influence Codes (UIC) 3-12



Rural Pockets in Urban Counties

- DOE will check for rural pockets and request approval from USDA
- NCES will be the resource used by DOE in 2023
- No Kid Hungry developed a mapping tool that looks for rural pockets: <u>https://bestpractices.nokidhungry.org/Summer-</u> <u>Meals-Eligibility-Map</u>
 - Area eligibility
 - RUCA codes
 - RUCC codes
 - UIC codes







What about non-rural areas?

Can non-congregate meals be provided in non-rural areas if Program access is limited because of lack of transportation, safety concerns, lack of a location to serve meals, or other similar reasons?

• No Non-congregate meal service is only allowed in rural areas where no congregate meal service is available



How should State agencies identify whether an area has "no congregate meal service" for the purpose of determining if non-congregate meal service is allowable?

- The State agency must ensure that the area the site proposes to serve is not or will not be served by a congregate meal service
- Must 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 required by Program regulations at 7 CFR 225.6(b)(5) when approving applicants proposing to serve children in the same area



Non-Congregate Rural Site Eligibility

- Sites must be located in an eligible area
 - Data from approved sources that indicate that 50 percent of the children in the site's area are eligible for free or reduced price school meals.
 - School or census data
 - Eligibility determinations are good for 5 years
- All newly established sites must use eligibility data from the current year.
- Residential and Day Camps cannot offer non-congregate meals
 Maine
 Moine
 Education

Non-Area Eligible Rural Service

- Individual eligibility for free or reduced price meals may be determined by using school data or the meal benefit application
- Only meals served to children eligible for free or reduced price school meals may be claimed for reimbursement for noncongregate meals
- Sponsors can use the free/reduced application to determine individual eligibility.
- Non-SFA Sponsors must have an MOU with SFA to obtain student data of not using the free/reduced application



State agencies have the responsibility to deny sponsors that they determine:

- 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
- You have the right to appeal the denial





Rural Non-Congregate Guidance



Can existing rural sites switch from congregate to noncongregate meal service?

• Yes. However, the non-congregate option is not intended to replace congregate meal service. **Priority goes to those rural areas that the congregate SFSP cannot reliably reach.**

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

• Under some circumstances, yes. State agencies must ensure that the congregate and non-congregate sites will not serve the same population of children for the same meal service on the same day.



If sponsors offer non-congregate meal service in rural areas, are they still required to follow existing SFSP program requirements?

Yes. All SFSP program requirements in regulations (7 CFR 225) and other related regulations and instructions apply to both congregate and non-congregate meal service, unless otherwise specified in this memorandum.





Can a site provide a combination of noncongregate and congregate meal services?

- Yes, non-congregate meal service may be provided when congregate meal service is not available
- There can be no overlap in service to children
 - Up to two meals, or one meal and one snack, per child, per day
- You must work with DOE Child Nutrition on approval for all noncongregate sites, including combination sites



Combination Sites - Examples

- A. A site that only offers breakfast through congregate service may be approved to provide a lunch through non-congregate meal service
- B. A congregate site that serves lunch and breakfast three days a week may be approved to provide non-congregate meals for days with no congregate service, including weekends
- C. A congregate site that operates in the month of July, may be approved to provide non-congregate meals for the summer period following their last congregate meal service day (provided that the non-congregate days are included in the site's approved service period)



Non-Congregate Meal Service Times

 Meal service times still need to be established for each site. These requirements may be met through State agency approved pick-up schedules or delivery plans with designated times for distribution.

• The State agency must approve any changes in meal service times. Sponsors offering a non-congregate meal service are not required to serve breakfast in the morning or allow one hour between the end of one meal service and the start of the next.



Meal Pick-Up

- Provides packaged meals that are taken home for children to eat later
- "Grab and go," curbside service, or take-home backpacks
- Meal pick-up is available to all children when the pick-up site is in an area-eligible rural area, or to children who are eligible for free or reduced price school meals when the pick-up site is in a rural area that is not area-eligible
- Parent Guardian pick-up is allowable
 - Must have policies and procedures in place to ensure meals are

for children only and that duplicate meals are not distributed

Home Delivery

- SFSP Sponsors can operate home delivery programs with DOE approval
- Signed consent forms will be required from parents/guardians
 - Indicates parent gives permission for home delivered meals
 - Collects information from household, such as number of children, dietary needs
- Recurring preorder form is a good way to streamline the process
- Food safety concerns must be considered



Home Delivery

- Eligibility for delivery routes must be established
 - All students within an eligible service area are eligible to receive home-delivered meals and may be invited to participate
 - This is important to consider when using census to determine eligibility! Delivery addresses must be within that census block.
 - In non-area eligible rural locations, individual student eligibility must be established – reimbursement only for those who qualify for free/reduced
 - Non-SFA sponsors can operate with a Memorandum of Understanding (MOU) with the applicable SFA(s) for data sharing purposes or by using the free/reduced application to determine eligibility in non-area eligible locations



Non-Congregate Safety Concerns

Food safety is important for all meal service models

Sponsors should ensure food selections and packaging promote food safety; sponsors should also include instructions on at-home storage and preparation

As with congregate SFSP meal service, sponsors must ensure noncongregate meal packages meet State and local health and safety requirements

Utilize food safety COVID-19 resources already developed



Non-Congregate Safety Concerns

- Sponsors providing non-congregate meal service in rural areas should prepare a food safety plan to ensure the meal service will be conducted safely.
- As a reminder, all food service staff must be trained on Program operations, which include local health, food safety, and sanitation guidelines.
- Sponsors can visit the Institute of Child Nutrition's Food Safety for Summer Meals webpage (<u>https://theicn.org/icn-resources-a-z/foodsafety-for-summermeals/</u>) for additional resources related to food safety in summer meals



- Multi-day meal issuance: multiple days of meals are provided on one day, whether unitized or comprised of bulk items
 - Example: a sponsor may provide 5 days of meals every Monday
 - Unitized: five distinctly packaged units or sets of menu items
 - Bulk: must be able to be portioned into specific quantities in line with the meal pattern requirements
- Maine is allowing up to 5 days of meals at a time



- Bulk specific food items provided in a larger quantity for a single meal service
 - Example: loaf of bread and package of deli meat
 - Meals should not require cooking, chopping, or other preparation requiring equipment or cooking skills
- Unitized Meal meal that is individually portioned, packaged, and served as a unit
 - Beverages such as milk or juice may be packaged separately, but served with the meal





- Mobile sites may be congregate or noncongregate – work with DOE on best model
- They may stop at designated pick-up locations (each would need a separate site info sheet)
- They may run a home delivered meal program

 You will need a plan for establishing eligibility of
 delivery routes





Offer Versus Serve

- Offer versus Serve is allowable for noncongregate service
- All required components must be offered
- Participants must have the ability to select a reimbursable meal
- Food safety requirements must be followed





Rural Non-Congregate Application



Qualifying Sites For Non-Congregate Service

Applying for Non-Congregate Service

1.Complete this online webinar (save your documentation)

2. Sign and upload the Attestation of Compliance with Rural Non-Congregate Meal Provision (CNPweb upload)

3. Complete MS-form for validation that the proposed site is in a rural location (MS-form/email)

5. Complete the sponsor plan for Non-congregate meals (CNPweb upload)

6. Update the Site Info Sheets (CNPweb)





Signed agreement by the Executive Contact for the acknowledgment of the following:

- Non-congregate meals will only be claimed that meet all State of Maine and USDA rural non-congregate SFSP meal requirements
- The sponsoring organization has received training on rural noncongregate meals in the SFSP
- The sponsoring organization will only claim non-congregate meals at sites approved by the State Agency
- The sponsoring organization will report required non-congregate meal data to the State Agency upon request as required by USDA





		Checklist	Applications	Activities	
Item	Required	On-Line Forms Descrip	tion		
1.		Sponsor Information She	et		
2.		Sponsor Budget Form			
3.		Site Information Sheets			
4.		Forms Submitted to State	e for Approval		
5.		Forms Approved by State	2		

Item	Required	Off-Line Forms Description	Down
1.		Sponsor-Site Agreement for unaffiliated Sites	
2.		501C (For non -SFA's)	
3.		Copy of Food Service Management Contract	
4.		Reason for Selecting the Chosen FSMC	
5.		Copy of bids received	
6.		Certificate of independent price comparison	
7.	Ø	Agreement for Summer Food Service Program	4
8.		Attestation for Non-Congregate Service SFSP 2023	A
9.		Non-Congregate Plan	

Enter Dates for Off-Line Forms



Attestation of Compliance with Rural Non-Congregate Meal Provision in the

Summer Food Service Program

I as the duly authorized representative, do hereby attest that the aforementioned Summer Food Service Program (SFSP) sponsoring organization and all sites under its jurisdiction operating rural noncongregate meal service in the Summer Food Service Program will operate in compliance with the requirements outlined by the United States Department of Agriculture. I attest that:

- Non-congregate meals will only be claimed that meet all State of Maine and USDA rural noncongregate SFSP meal requirements
- · The sponsoring organization has received training on rural non-congregate meals in the SFSP
- The sponsoring organization will only claim non-congregate meals at sites approved by the State
 Agency
- The sponsoring organization will report required non-congregate meal data to the State Agency upon request as required by USDA

I certify that this attestation is true and correct, and therefore, I believe the SFSP sponsoring organization is eligible for reimbursement for rural non-congregate meals. I understand that if the State Agency determines the SFSP sponsoring organization to be noncompliant with one or more of the requirements set forth in this attestation statement, fiscal action will include disallowance of meals, and/or withholding of payment. I understand that noncompliance may also impact the sponsoring organization's approval to provide rural non-congregate meals in the future.

Sponsor Name

Printed Name of Executive Contact/Superintendent

Signature of Executive Contact/Superintendent

Date



Screen shot of Attestation found in CNPweb under the Sponsor Checklist Tab

Non-Congregate Site Eligibility Request

* Required
1. Name of SFSP Sponsor
Enter your answer
2. Name and title of person completing this form *
Enter your answer
3. Email address of person completing this form *
Enter your answer
4. Name of proposed Non-Congregate Site *
Enter your answer
 Street address of the proposed Non-Congregate site. Must include street and number, city, and zip code.
Enter your answer
6. County the proposed site is located in. Please do not abbreviate the County's name. $ * $
Enter your answer
Submit

MS form – Must be completed for each proposed Non Congregate site

All sites applying to operate a non-congregate meal service must be evaluated based on address.

Apply for rural status by completing this <u>Microsoft form</u>.

You will receive notification once the site is qualified as rural - save this documentation.

This moves the process to the next step.




Non-Congregate Plan

- Must be completed for each site operating a noncongregate service
- More accurately capture which days and meals will be served in Non-Congregate service
- Acknowledgment that the site will not conflict or overlap with any other sites in the service area



	Checl	klist	Applications	Activities	Claims								
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9.		Non-Congregate Plan	



Sponsor Plan for Non-Congregate Meal Service in Rural Areas

To receive reimbursement for eligible meals, you must have a site information sheet approved in CNPweb for non-congregate sites. This form allows the State Agency to review overall planned non-congregate service models since the site information sheets will not capture all this information. Please complete one form per each non-congregate site proposed.

Sponsor Name:

Sponsor Food Service Contact Name and Title:

Non-Congregate Site Name:

Non-Congregate Site Address (for mobile home delivery routes, what is the service area? What is the name and address of the local school?):

Is this site in a rural area? Yes / No

Is there a current congregate meals site in the area? If yes, please describe:

How does this site meet eligibility requirements?

- o School Data Enter School Name and Percentage:
- Census Tract Data Enter Track/Group #:
- o Other (prior eligible congregate site, census tract averaging, etc.):
- o Not area eligible only free/reduced price students will be claimed

Screen shot of Sponsor plan found in CNPweb under the Sponsor Checklist Tab





Sponsor Plan - CNPweb

- One plan per non-congregate site proposed (a mobile home delivery program can be one site)
- If multiple sites/plans, combine documents into one upload for CNPweb



Site Information Sheets - CNPweb

- This may be a site addition (email Kate) or changing a congregate site to a non-congregate one
- For non-congregate site info sheets: #10 on the site info sheet - Mobile Site; this allows the Sponsor to indicate Meal service times close together. (breakfast can end at 10AM and lunch can start at 10AM)
- And under #10 "other" site type write "non-congregate"



Site Information Sheet CNPweb Site Location Type: (Check all that apply) 10. School Park To indicate you are operating a Mobile non-congregate site indicate Mobile and "Other" Non-Library Congregate on #10 Tribal Upward Bound Housing Authority Camp Community Center Other (Please enter) Non Congregate



Site Information Sheet CNPweb

20. Enter Number of Operating Days for each month operating

Oct:	0	Nov:	0	Dec:	0	Jan:	0	Feb:	0	Mar:	0
Apr:	0	May:	0	Jun:	0	Jul:	9	Aug:	6	Sep:	0

- For each month of operating, indicate the number days you are providing for
- This may be different from the number days you plan to be physically serving meals





Site Information Sheet CNPweb

	Meal Type S = Self-Prep V = Vended		Offer vs Serve	Begin Time	9	End Time		Days Meals Served M T W T F S		S	Estimated Attendance	Est. # Eligible (Camps Only)	САР					
22.	Breakfast	S •		09:30 AM	~	10:00 AM	~		✓	~	~		<	✓	✓	80	0	200
23.	AM Snack	~			~		~									0	0	0
24.	Lunch	S •		10:00 AM	*	10:30 AM	~		✓	~	~	<	✓	~	<	80	0	200
25.	PM Snack	~			*		~									0	0	0
26.	Supper	~			~		~									0	0	0

- If serving more than one meal at a time run the site times together
- Indicate on "Days Meals Served" the days you are providing meals for



Am I approved?

- Child Nutrition will review the complete application packet including:
 - Rural status (MS Form)
 - Non-congregate Attestation (CNPweb application checklist)
 - Non-Congregate Plan for Each Site (CNPweb application checklist)
 - Site Information Sheet (CNPweb application)
- When SFSP application is approved in CNPweb, congregate services approved





Rural Non-Congregate Monitoring Requirements



Non-Congregate Monitoring

- All existing SFSP monitoring requirements are in place
 - Pre-operational visits (all non-congregate sites are new sites for monitoring purposes)
 - Site reviews (two week and four week)
 - Racial and Ethnic data form (not monitoring but required for non-congregate)
- DOE Child Nutrition will monitor as part of the Administrative Review process



How Should Sponsors Monitor Meal Delivery?

- Monitoring should include a review of the full service time
 - Monitor should accompany the driver, or follow, for full delivery route
 - Includes: observing meals being loaded into the vehicle; checking meal logs and delivery routes to ensure they are correct
 - Must ensure eligible children are receiving the proper number of meals that meet all meal pattern and safety guidelines





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To file sprogan decrimancin complaint, a complaintent should compare a Fern AD-327, USA Margan Dackininston Complaint Fern, which can be obtained online, at https://www. betwo.usal.gov/com/should usal.gov/com.ptintfern -0080-0022-5081-11-32-1173225311.cot. Tom any USA file. by colling 09861 932-9992, cot y writing a letter addressed to USAN. The telter must contain the complainent's name, address, kelphone number, and a writer section of this alleged discriminacry action in sufficient data is arrhorm the assistant Section y for chill high sVCM global to arrhor the ratio and sileged doiling risk water on. The complained AD-3027 time of telter must be scientifies to USAN y?

Marc U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SIV Washington, D.C. 20253-8410; or

fax: (833) 256-1665 cr (202) 690-7442;

email: program.intake@usda.gov.

This institution is an equal opportunity provider

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de Deroches Civilies (#GCR: por sus siguitas en inglés) sobre la natura aza y la faceta de la presunta violación de los derechos ovies. La carta o el formulario AD-3027 completado deba enviense al USDA por medio de correco postal.

US. Department of Agriculture US. Department of Agriculture Drice of the Assistant Secretary for Civil Fights 1400 indepandence Avenue, SW Washington, D.C. 20250-9410, of

(533) 256-1665 of (202) 600-7442; entres electrónice: program inteletiuscia gov. Esta institución ofrece igualdad de oportunidades

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Civil Rights requirements are in place for Non-Congregate Service

And Justice For All poster is required for *all* sites

Must be posted on delivery vehicles





Rural Non-Congregate Reporting



Reporting Requirements

- Required to report to USDA FNS the total number of congregate and non-congregate sponsors, sites and meals
- All non-congregate meals will be claimed at reimbursement rates for Rural sites
- Standard meal counting and reporting procedures apply to both congregate and non-congregate meal service
- Data will be requested within 30 days of the end of the SFSP claiming month; data must be reported to USDA within 60 days



Reporting Requirements

- Sponsors must maintain and report by month:
 - Separate meal counts for non-congregate meals served by meal service
- We will need to report the numbers of:
 - Sponsors operating only non-congregate sites
 - Sponsors operating both non-congregate and congregate sites
 - Total sites serving non-congregate meals
 - Total sites serving both non-congregate and congregate meals
 - Total non-congregate meals, by meal service



Recap: Non-Congregate Site Consideration

- Rural areas
- Traditional eligibility
- No overlap with congregate sites
- Meal times still need approval
- Can have hybrid models of congregate and noncongregate
- Can have mobile meals
- Ensure one meal type per child per day up to SFSP maximum



Federal Civil Rights Statment

- In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.
- Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible State or local Agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.
- 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: <u>https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-</u> <u>Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf</u>, 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:
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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
- This institution is an equal opportunity provider.
- (Federal statement updated 5/18/2022)



Maine Civil Rights Statement

The Maine Human Rights Act prohibits discrimination because of race, color, sex, sexual orientation, age, physical or mental disability, genetic information, religion, ancestry or national origin.

Complaints of discrimination must be filed at the office of the Maine Human Rights Commission, 51 State House Station, Augusta, Maine 04333-0051. If you wish to file a discrimination complaint electronically, visit the Human Rights Commission website

at <u>https://www.maine.gov/mhrc/file/instructions</u> and complete an intake questionnaire. Maine is an equal opportunity provider and employer.





Thank you for attending!

What additional questions do you have?



