

# Summer 2024 Non-congregate Meal Service

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# Who is eligible to participate as a sponsor operating a non-congregate meal service?

- Sponsors of the Summer Food Service Program (SFSP)
  - ✓ Units of local, municipal, county or State government;
  - ✓ Tribal Governments;
  - ✓ Private, nonprofit organizations.
- School Food Authorities (SFA) operating the National School Lunch Program (NSLP) Seamless Summer Option (SSO)
  - ✓ Non-congregate breakfast, lunch, or snacks served under the SSO are reimbursed at the NSLP “free” rates. If suppers are provided, they would be reimbursed at the NSLP free rate for lunches.

# Rural Definition per 7 CFR 225.2

- *Rural* means:
- (1) Any area in a county which is not a part of a Metropolitan Statistical Area based on the Office of Management and Budget's Delineations of Metropolitan Statistical Areas;
- (2) Any area in a county classified as a non-metropolitan area based on USDA Economic Research Service's Rural-Urban Continuum Codes and Urban Influence Codes;
- (3) Any census tract classified as a non-metropolitan area based on USDA Economic Research Service's Rural-Urban Commuting Area codes;
- (4) Any area of a Metropolitan Statistical Area which is not part of a Census Bureau-defined urban area;

## Rural Definition (cont'd)

- (5) Any area of a State which is not part of an urban area as determined by the Secretary;
- (6) Any subsequent substitution or update of the aforementioned classification schemes that Federal governing bodies create; or
- (7) Any “pocket” within a Metropolitan Statistical Area which, at the option of the State agency and with FNSRO approval, is determined to be rural in character based on other data sources.

# Non-Congregate & Good Standing

- All sponsors must be considered in “good standing” to operate a non-congregate meal service:
- Good standing means the status of a Program operator that meets its Program responsibilities, is current with its financial obligations, and, if applicable, has fully implemented all corrective actions within the required time frame for any CN Programs being operated with the State agency

# NEW Private Non-Profit Sponsors

- OSDE will be approving NEW private non-profit sponsors for non-congregate service on a case-by-case basis;
- This will be based on being in good standing in other CN Programs being operated, such as CACFP, and the ability to meet the SFSP performance standards as indicated in the regulatory VCA and sponsor application process

# Area Eligibility

- Sites must be located in an eligible area;
- Data sources must indicate that 50% of the children in the site's area are eligible for free or reduced-price school meals.
  - ✓ School
  - ✓ Census
  - ✓ Other approved

Refer to SFSP 03-2017 for additional guidance on area eligibility, if needed.

# Where can non-congregate meals be served?

- Sponsors can provide non-congregate meals in rural areas, if the rural area meets the definition of an 'area in which poor economic conditions exist', then all meals for all children may be claimed for reimbursement. (7 CFR 225.2)



# Non-congregate sites in non-area eligible areas

- Non-congregate sites located in non-area eligible areas *may* be approved as a Conditional Non-Congregate Site;
- Only SFA's are allowed to be a Conditional Non-Congregate Site;
- Only meals served to children who are eligible for free or reduced-price meals under the National School Lunch Program (NSLP) or the School Breakfast Program (SBP) may be claimed

# How will we determine that an area is rural?

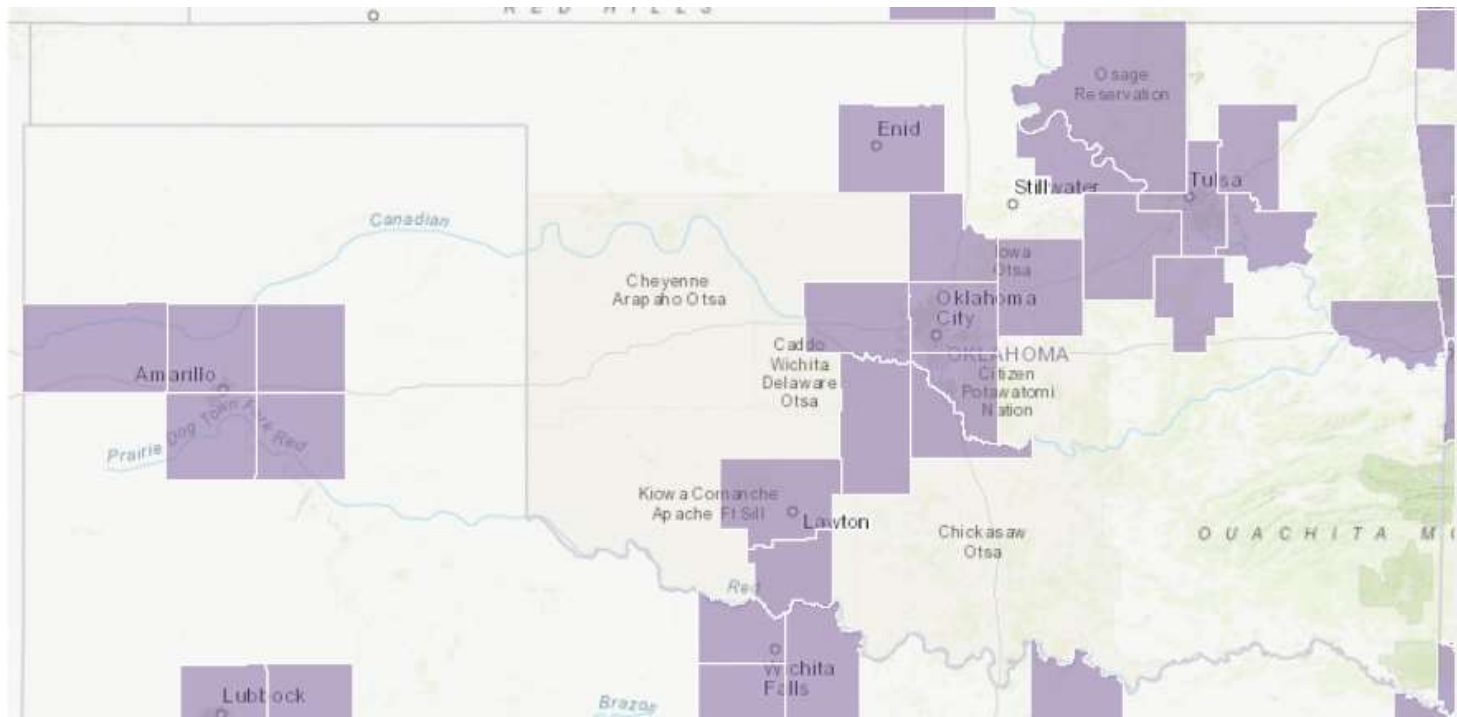
- Rural Designation Map designed by Food and Nutrition Services (FNS)

- ✓ <http://www.fns.usda.gov/rural-designation>

- ✓ According to this map, the following counties are considered urban in the state of Oklahoma, but could have rural “pockets”

Canadian	Garfield	Oklahoma	Tulsa
Cleveland	Grady	Okmulgee	Wagoner
Comanche	Lincoln	Osage	
Cotton	Logan	Pawnee	
Creek	McClain	Rogers	

# Urban counties in Oklahoma



# How will we determine a rural pocket?

- Rural “pockets” are areas that are determined to be geographically isolated from urban areas;
- Rural “pockets” are approved by the State agency in concurrence with FNS;
- Information used to determine if a site is a rural “pocket”:
  - ✓ Population
  - ✓ Proximity to other sites (congregate or non-congregate)
  - ✓ Is the site a camp or closed enrolled site
  - ✓ Many other factors will be considered to determine site approval

# What are some of the reasons non-congregate meal service will not be allowed?

- Non-congregate meal service is only allowed in rural areas or rural pockets;
- If the proposed site had the ability to provide congregate meals in prior summers, adequate justification must be provided as to why it is not feasible now;
- Non-congregate meal service is not allowed due to issues such as a lack of transportation, safety concerns, lack of location to serve meals, or other similar reasons;
- Sponsor must demonstrate that congregate meal service is not feasible;
- Camps cannot offer non-congregate meal service if congregate meal service is available;
- If the sponsor is determined to not be financially and administratively capable of operating a non-congregate meal service.

# Other ways a non-congregate meal service may be approved to operate

- A non-congregate site may be approved to operate in close proximity to a congregate site that is closed enrolled or a camp;
- Existing rural sites may be allowed to switch from congregate to non-congregate meal service;
- A sponsor may choose to solely operate a non-congregate meal service;
- Sponsors offering non-congregate meal service in rural areas are still required to follow existing SFSP program requirements.

# Service Models-

## How your non-congregate site will offer meals in rural areas

- Meal Pick-up
  - ✓ Grab and go
  - ✓ Curbside service
  - ✓ Take-home backpacks
- Home Delivery
  - ✓ Door to door hand delivery
  - ✓ Mail or delivery service (with written parental consent)

# Home Delivery

- Sponsors that are approved to provide a non-congregate meal service using home delivery:
  - ✓ Must have a way to determine the eligible population (only children in area-eligible areas may be claimed) and be able to identify and invite households of eligible children to participate in the meal delivery service;
    - Use of your own organizations data;
    - Randomly reach out to a certain population to confidentially collect data;
    - Partner with local SFAs to obtain student data (will require an MOU to be in place)
    - Sites must be in both a rural and area eligible area
  - ✓ Obtain written consent from the eligible child's parent/guardian;
    - OSDE will provide a consent form that you will be required to use
  - ✓ Confirm the household's current contact information and the number of eligible children in the household;
  - ✓ Protect confidentiality of participants and their households the process;



# Home Delivery continued...

- There is no additional reimbursement for home delivery;
  - ✓ Expenses such as postage, delivery fees, or mileage would be considered an allowable cost under SFSP or SSO or they could be paid for with non-program funds
- Meals provided through home delivery are not required to be shelf stable;
  - ✓ Be mindful of State or local food safety requirements
  - ✓ Participating households' ability to prepare and store meals/food
  - ✓ The meals must meet SFSP or SSO meal pattern requirements
- Each stop (e.g., home) will not be considered a “site”;
  - ✓ Non-congregate sites should be entered in the SFSP or SSO separately.
- The child(ren) do not need to be present at the time of delivery.
  - ✓ Written consent must be obtained
  - ✓ If the meal is shelf-stable, no one is required to be present

# Meal Service

- Just like congregate meals, non-congregate meals must also comply with the current meal patterns requirements for SFSP and SSO;
- Offer versus serve (OVS) will **not** be allowed for any non-congregate meal service;
- The maximum number of meals that may be offered at a non-congregate site and congregate site are the same;
- Sponsors are still required to provide meal modifications for participants with disabilities or special dietary needs when serving non-congregate meals;
  - ✓ The needs should be identified by the parent/guardian on the consent form
- Sponsors may provide meals in bulk, either through pick-up or delivery;
  - ✓ Maximum of **ten (10)** days at a time
  - ✓ Distribution must meet safety and integrity standards
  - ✓ Submit to SDE a schedule of planned deliveries
  - ✓ Provide a menu and documentation of planned bulk meals

# Meal Service continued...

- Second meals are not reimbursable for non-congregate meal service;
  - ✓ Only one meal, per child, per meal service
- Meal service time requirements in SFSP continue to apply;
  - ✓ Meal service times must still be established for each site
  - ✓ Pick-up schedules
  - ✓ Delivery plans with designated distribution times
  - ✓ Not required to serve breakfast in the morning or allow one hour in between the end of one meal service and the start of the next
- Meals may be distributed to parents/guardians at non-congregate pick-up locations;
  - ✓ Names of child(ren) must be recorded when meals are picked up as well as meal counts
- Meal counts for non-congregate meals must be maintained separately from congregate meals;
- Sponsors are required to announce the availability of non-congregate meals;
- “And Justice for All” posters must be displayed at pick-up sites and in home delivery transportation.

# Additional things to consider when planning for your non-congregate meal service

- What are your proposed target areas?
- Why is a congregate meal service not feasible?
- What type of service model will you be utilizing?
- How will you determine the eligibility of your population?
- What are the proposed dates and times of meal service?
- Will you be serving **bulk** meals, if so, how many days at a time (no more than 5)
- How will you implement safeguards to ensure that children are not receiving more than the maximum allowance of meals per day?
- How will you address food safety and provide to household's instructions on how to prepare and store meals/food items?
- How will you communicate to parents/guardians what constitutes as a “meal”, especially with bulk items
- Will your proposed population have any barriers?
  - ✓ Will the parents/guardians be available to assist with meal preparation, if needed
  - ✓ What are the age and developmental abilities of children served
  - ✓ What is the literacy levels of the households served
  - ✓ Access (or lack of) to kitchen appliances, cooking tools, and potable water

# Steps to “apply” for a non-congregate meal service

- Determine if the proposed area you want to serve is eligible;
  - ✓ If the service area is within a rural county, the area is eligible
  - ✓ If the service area is within an urban county, you will need to work with SDE and USDA to determine if the area can be identified as a rural “pocket”
- Complete the SFSP/SSO Non-Congregate Meal Service Application;
  - ✓ This form will be provided to all applicants soon through mass email and placed in our SFSP and SSO websites
  - ✓ The application will require very detailed information which will be necessary in facilitating our approval process
  - ✓ **DEADLINE to apply for a rural non-congregate meal service is April 30, 2024!!!**
- Wait for approval from SDE
  - ✓ We will work as quickly as possible to approve your applications, we know there is a lot of work to be done after approval
  - ✓ Any meals served in a non-congregate meal service prior to approval may not be claimed

# What happens after approval

- Complete online application, remembering to enter the non-congregate site separately;
- If home delivery-
  - ✓ Identify and invite households of eligible children to participate and obtain written consent from parent/guardian
  - ✓ Submit list of eligible children whose parent/guardian agreed/consented and will be participating in the non-congregate meal service
- Request any additional materials from SDE, such as And Justice for All posters;
- Keep rosters and record names of children served (even if child was not present to receive the meal);
- Maintain meal counts for non-congregate meal service separate from congregate meal service;
- Ask SDE at any time if you are unsure of what to do!

# YouTube Link

<https://youtu.be/Zs-W4meGNPg>