

## **Rural Non-Congregate Meal Service Webinar Script February 19, 2024**

Welcome to the SFSP Mini Series Webinar. The topic of this session is Rural Non-Congregate Meal Service.

The Summer EBT and Rural Non-congregate Summer Meals Option Interim Final Rule was published on December 29, 2023. This interim final rule amends the Summer Food Service Program and the National School Lunch Program's Seamless Summer Option regulations to codify the flexibility for rural program operators to provide non-congregate meal service in the SFSP and SSO. This rule also establishes regulations and codifies the Summer EBT Program in the Code of Federal Regulations. This webinar will review the Rural Non-congregate Meal Service requirements for the Summer Food Service Program. This includes, sponsor and site eligibility, when to offer non-congregate meals, the various meal distribution models, meal service requirements, site monitoring, civil rights, meal counting, and financial management requirements. We will also discuss how meals will be claimed, the next steps to applying and best practices.

The purpose of providing non-congregate meals in rural areas is to broaden access to nutritious meals in the summer months, especially in areas where it is more difficult for children to participate in congregate meals or when there is a lack of facilities to host congregate meals.

We know that there are benefits when children are able to eat onsite during summer school, summer recreation programs, vacation bible schools and the like. These locations are a vital part of the summer nutrition programs, providing a sense of community and enrichment opportunities for kids. Therefore, sponsors are encouraged to continue to provide these opportunities when feasible and utilize the non-congregate option to expand their summer nutrition programs beyond the congregate meal settings, when possible.

So, who can offer Rural Non-Congregate Meals? Almost any organization that is able to participate in the Summer Food Service Program. These include public and private nonprofit school food authorities, units of local, municipal, county or State government, Tribal Governments, and Private nonprofit organizations that are in good standing with the State Agency. Since residential camps provide congregate meals as part of their programming, they are unable to offer non-congregate meals.

What is Good Standing mean? 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 with the required time.

One requirement of non-congregate meal service is that non-congregate meals cannot be provided when congregate meal service is available. Therefore, USDA provided some guidelines to consider when congregate meals are being provided in the community. One being the physical conditions or barriers to congregate sites. This may include a variety of things, but one example could be if the congregate site is located on the outside of town on a busy highway, not easily accessed by children that do not have transportation, a site within the center of the community could possibly provide non-congregate meals to children. Another consideration is if the congregate site that is operating, cannot serve additional children in the community based on the capacity of the serving area. In addition to these, we can also look at the days of the week and the types of meals that are being offered at the congregate site. Say for instance, the congregate site is offering breakfast and lunch, Monday through Friday, the non-congregate site could provide meals for the weekend. And finally, some sites may just not be appealing to specific groups so those children would not attend the congregate site. When congregate meals are being provided in a community, DPI will work with you to determine if and how non-congregate meals can be provided. Here is a list of additional circumstances may call for offering non-congregate meals.

One may be to offer non-congregate meals after summer school or any enrolled programming has ended. Lack of transportation and programming decreases participation and can also make the congregate meal service not financially viable.

Another is when a rural area does not have a facility to use to host a congregate site. This could be a situation where there is rural trailer park that could potentially be a congregate site but lacks anywhere for the children to sit and eat. In this instance, non-congregate meals could be provided to children living there all summer.

Also, there may be cases when a sponsor cannot staff a congregate program but has enough resources to prepare and provide non-congregate meals once or twice a week.

And, as mentioned previously, non-congregate meals could be provided when the only other summer meal sites nearby, are closed to community participation and there are no other means to host a congregate site. The second key requirement to be able to offer non-congregate meals is that they can only be provided in areas that are determined rural based on the USDA Rural Designation Map. This map has recently been updated to include much more data to determine the rural status. Therefore, many more areas within Wisconsin are now considered rural. The map will be updated annually, going forward, however once an area is determined to be rural, it can continue to provide non-congregate meals for up to 5 summers, regardless if the map has changed. This is similar being able to use area eligibility data to qualify a site for 5 years.

Rural non-congregate sites may operate in an area that is considered area eligible, meaning the site is within the attendance area of a school with 50% or more of the children being eligible for free and reduced-price meals or within a census tract that qualifies. In this situation, the meals are provided to all children 18 and under, free of charge and all meals are reimbursable.

Rural non-congregate sites operating in areas that are not area eligible, can only receive reimbursement for the meals served to children who are eligible for free or reduced-price meals. Meals can be served to children who are not income eligible, but the sponsor must either charge for the meal or off-set the cost of the meal with alternate funding that does not include other funding from other Child Nutrition Programs.

So far, we have covered who, when and where to offer non-congregate meals, now we'll move on to the how. There are 2 meal models to choose from. Either meal pick-up from a site or delivery to the participants home.

Meal Pick-up is when meals are packaged and taken home for children to eat later. This can be done through a grab and go type curbside service, or take-home packages/backpacks provided to children after programming at a site has ended. In this situation the meals must be packaged and portioned to allow children to carry the food from the SFSP site to their home.

Home Delivery is when meals are delivered directly to homes. Delivery could be completed by the sponsor utilizing sponsor staff or volunteers, a delivery service, or even by mail in very rural areas.

When choosing the Pick-up Model, the sponsor may serve meals directly to children OR to parents or guardians without the children present.

When meals are served only to children, the site will operate like most open sites, with the exception of the child being able to leave the site with their meal or meals to be consumed later.

It does get a little more involved when choosing to allow parents or guardians to pick up meals without the children present. In this situation, it is required that the sponsor only provide the number of meals allowed for the number of children living in the household. In order to do that the sponsor will need to establish a process to determine the number of children in the household. One way to do this if the sponsor is a school, is to ask the households that are interested in picking up meals, to sign-up ahead of time and indicate how many children are within their household. The school can then check that number against the student database to verify how many children are in the household. Schools and non-schools sponsors could also request that families sign up for the meals with the children in attendance ahead of time or the first time that meals are provided. DPI consultants can help sponsors with determining the best method for your situation.

Sponsors who do allow for parent/guardian pick-up can allow other adults that care for their children to pick up meals on their behalf. This should be established ahead of time so that at the time of pick-up, the site staff know that it is OK to provide them with the meals. Adults who are not the parent, guardian or not providing care for a child, cannot pick up meals on behalf of other families.

The other distribution model is Home Delivery. Sponsors using this model are required invite households to participate and get consent from the child's parent or guardian prior to delivering meals. This can be done via the household filling out a form (online or hard copy) or by consenting via email. At the same time, the sponsor will need to confirm the number of children living in the household, just like what is required for Parent/Guardian Pick-up.

When delivering to homes, the child does not 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.

As mentioned previously, non-congregate meals may be provided at a pick-up site or at a child's home that are not within an area that is considered area eligible. These sites are called Conditional Non-Congregate Sites. The sponsor must confirm the number of children 18 and under in the household that are eligible for free/reduced price meals. School sponsors may use current eligibility data available in their student database. They may also collect household income statements for children not in their database. Non-school sponsors must collect household income statements to determine eligibility OR sign a Memorandum of Understanding with the local school to obtain student eligibility data for eligibility determination purposes.

When serving only children eligible for free and reduced-price meals, the sponsor must take measures to prevent overt identification.

Now we'll review the Meal Service Requirements for Rural Non-congregate Meals.

Sponsors and sites may provide up to two non-congregate meal services, in any combination other than lunch and supper, for any day of the week, in which congregate meal service is not available. This does include weekends.

Sponsor may also distribute meals for a single day or for multiple days at a time. When providing for multiple days at a time, the number of days will be determined on a case-by-case basis during the application process but will not exceed 10 days for pick-up sites and 5 days for home delivery.

Sponsors may also provide bulk food items, however only to the extent that the bulk items require minimal preparation by the child.

Meal service times for non-congregate sites must be established and approved within the site application. Meal service time rules regarding when breakfast is served or the requirement for a 1-hour lapse between meal services does not apply to non-congregate sites.

Meal pattern requirements remain the same for non-congregate meals. School sponsors may use the Summer Food Service Program meal pattern, or the meal patterns used during the regular school year. Non-school sponsors are required to follow the Summer Food Service Program meal pattern.

At this time, only school sponsors are allowed to utilize offer versus serve. Wisconsin has submitted a waiver request to waive this requirement to USDA for non-school sponsors, so stay tuned.

Like congregate sites, sponsors must provide accommodations for Special Dietary Needs when required. Sponsors may choose to provide food items in bulk, but with the following restrictions. The meals must require minimal preparation by the child.

Required food components for each reimbursable meal are served. All food items that contribute to a reimbursable meal are clearly identifiable.

Menus are provided and clearly indicate the food items and portion sizes for each reimbursable meal. Heating or warming, is minimal. Sponsors may offer food items that require further preparation only with State agency and USDA approval. The maximum number of reimbursable meals provided to a child does not exceed the number of meals that could be provided over a 5-calendar day period.

As with all types of sites, non-congregate meals must be counted at the point of service, by type. Sponsors may use meal count forms provided by DPI on the SFSP Materials & Resources webpage, under the Accurate Meal Counting section or an approved alternate method. The meal service model and how many day's worth of meals served at one time, tends to dictate which forms to use. When serving one meal type directly to the children, the regular tally meal count form may be used. If serving multi-day meals directly to children, the multi-day meal service meal count form should be used. When serving multi-day meals to parents or guardians, you may need to use a sign-up roster to confirm those picking up meals are receiving the correct number of meals for the household and check off when meals are picked up OR use a combination of roster and the multi-day service meal count form. For home delivery, sponsor may want to use the delivery roster that has the number of meals delivered by type to each household or a combination of roster and multi-day meal count form.

Consolidating multi-day meals for the claim for reimbursement can be confusing. Be sure to use a form that best suits your needs and have a system in place that involves another person double checking the consolidated meal counts before filing claims.

All civil rights requirements apply to non-congregate sites. Sponsors of open non-congregate sites must make the community aware of the meal sites, dates of operation and times of meal services, including delivery and/or pick-up times. Conditional non-congregate sites are required to notify participants of the availability of free meals and if an income application is needed.

Each site is required to display the And Justice for All poster. For home delivery, the poster must be prominently displayed (such as in a window) on all vehicles.

Sponsors are required to collect Race and Ethnicity data for non-congregate sites. Due to the nature of the service, it may not be possible to collect data from participants directly. In that case, completing the Race and Ethnicity Data Form using aggregate data is acceptable.

The requirements for monitoring non-congregate sites are the same as monitoring congregate sites, with the exception that when a returning congregate site starts serving non-congregate meals for the first time, the site will be considered new in terms of the monitoring required.

All monitoring is required to be documented on the form located on our website, unless an alternate form is approved by DPI. The form can be found on the Rural Non-congregate page and under the Monitoring section of the Materials and Resources page.

The purpose of the Pre-operational visit is to determine that the site has the capability and the facilities to provide the meal service planned for the number of children anticipated to be served. Pre-operational visits are required to be conducted prior to operation for new sites, returning sites that experienced problems the previous year, and existing sites that are new to non-congregate meal service. If you have a non-congregate site that operated in the prior year, a pre-operational visit is not required.

Site visits are to be conducted within the first two weeks of operation for new sites, sites identified as having operational problems the prior year, and sites new to non-congregate meal service. These visits are to ensure that the food service is operating smoothly and that any apparent problems are immediately resolved.

Site reviews must be conducted within the first 4 weeks of operation. This is required for all sites, every year to determine if the site is meeting all the Program requirements. Monitors must observe a complete meal service from beginning to end, including delivery or preparation of meals, the meal service, and clean up after meals.

If a sponsor wants to conduct the full review during the first two weeks of operation, it can replace the required site visit for new sites or those that had problems in the prior year. By doing this, the sponsor is limiting the number of trips to the site, as long as key issues are not found that will require follow-up.

Follow-up, to ensure corrective action has been taken, is required whenever key findings are identified. When follow-up occurs depends on the severity of the problem.

When observing a Pick-up site, it is required that the monitor observe meal prep and packaging of the meals to ensure the meal is meeting the meal pattern requirements and that the meals are prepped and held according to standard operating procedures for non-congregate meals. Monitors will also need to review documentation of production to ensure the meal is fully documented so it can be claimed. Finally, the monitor will need to observe the set-up of the meal distribution line and meal distribution from start to end for a full review.

When observing meal service, you will be checking to ensure that all staff or volunteers have been trained, that meals are served during the approved meal service time, that meals are served directly to children and/or parent and guardians of households that have been verified for participation, that meals are provided as planned, meaning the components of the meals, # of meals provided at one time, etc., that meals are counted at the point of service, that meals are provided without discrimination and that the Justice for All Poster is displayed. All food service staff and/or volunteers must be following food safety guidelines and handle leftover meals according to standard operating procedures.

For home delivery, observe meal prep and packaging of the meals to ensure the meal is meeting the meal pattern requirements and that the meals are prepped and held according to your standard operating procedures for non-congregate meals. Also, review documentation of production to ensure the meal is fully documented so it can be claimed.

Observation of the meal service will be a bit different. Be sure to observe meals being loaded into delivery vehicles and either ride along or follow the delivery driver.

When monitoring the home delivery, look to see if all staff/volunteers have been trained. Check to ensure that: meals are delivered during the approved meal service time and only to households that have consented to meal delivery. That meals are provided as planned, all meal components are offered and staff are providing the correct number of days worth of meals, if applicable. That meals are counted at the point of service using the system staff have been trained on.

That meals are provided without discrimination and the Justice for All poster is displayed on a door or window of the vehicle, and that food service staff/volunteers following standard operating procedures for food safety and sanitation.

Once approved to operate non-congregate sites, the sponsor will complete a site application within the SFSP contract, following directions provided by DPI. This will allow for the ability to report non-congregate meals separate from congregate meals within the claim for reimbursement, if both types of sites are operated.

As mentioned previously, all non-congregate meals served to children 18 and under and disabled adults attending a public or private educational programs at sites that are Rural & Area Eligible are to be provided free of charge and are eligible for reimbursement. These meals will be reimbursed at the self/prep rural rate.

If a site is rural but not area eligible, only the meals served to children and disabled adults attending a public or private educational programs may be provided free of charge and submitted for reimbursement. These meals are reimbursed at the same self prep/rural rate of reimbursement.

The cost of food, non-food supplies, food service labor, transportation of meals, etc., related to non-congregate meal service are allowable SFSP expenses. Sponsors are required to include these costs within the Non-Profit Food Service Account and maintain expense documentation, just as it is required for congregate meals. You may refer to the Financial Management located on our website, for more information.

Unallowable costs include, but are not limited to, the cost of meals served to participants that are not eligible for free and reduced-price meals at conditional non-congregate sites (i.e., sites that are not area eligible) and meals served to non-program adults.

Are you interested in providing rural non-congregate meals this summer? We hope so! These are the step to take to move forward with getting approved to do so. First, contact DPI at [sfsp@dpi.wi.gov](mailto:sfsp@dpi.wi.gov) to set up a time to confirm eligibility and discuss your rural non-congregate meal plans.

Once we've discussed the plans, the DPI consultant will forward you a link to complete the Meal Service & Integrity Plan. This plan asks for information relevant to the non-congregate site operation that is not in the online site application yet. Once the DPI consultant approves the plan, instructions for completing the SFSP Application to include non-congregate sites will be provided. As with other types of sites, be sure to notify the health dept of the non-congregate sites and the community of the availability of non-congregate meals, providing instructions to sign-up, if necessary.

Here is a list of what is asked for in the Meal Service & Integrity Plan. Instructions for completing the plan can be found on our website, under the Rural Non-congregate Meals section. The Plan asks for:  
A Needs Statement, which is essentially the reason why the sponsors is requesting to serve non-congregate meals in lieu of congregate meals.

The location of each potential non-congregate site so we can confirm that it is rural and if area eligible or not.

What type of meals will be provided at the sites

Which meal distribution models will be used, either pick-up by children, pick-up allowed for parent/guardians, or home delivery.

The process for verifying the number of children in the household for pick-up and how household consent will be obtained for home delivery.

Whether the site will provide congregate meals in addition to non-congregate meals

How many meals will be distributed at one time.

How the meal count will be taken and The Standard Operating Procedure for ensuring food safety throughout the meal prep and service of the meals.

In addition to the Plan, sponsors will need to submit a sample menu indicating the menu items and planned portion sizes, to demonstrate that meal pattern requirements will be met. The menus should provide a variety of items to ensure Dietary Guidelines have been met and must require minimal preparation on the part of the participant. Please include storage and prep instructions for households if the menu requires it. Also, submit the form or link to an online survey that will be used for meal sign-up or consent to deliver, if applicable. If the sponsor is not a school and will be requesting information from the local school district's student database, a written agreement or Memorandum of Understanding with the school to use the school's student data as the basis for establishing their eligible population is required.

Let's review some best practices for rural non-congregate meals:

It is important that meals are provided that are easily identifiable to the participants and that they require minimal preparation.

Consider meal quality and storage when deciding on distributing multiple days' worth of meals at one time.

Dating the packaging and providing a deadline for discarding the meal items, will help families keep track of menu item freshness when multi-day meals are provided.

For pick-up sites, consider how meals will be packaged that would allow children to take meals home with them

Here are a few more things to think about:

When developing sign up forms, only ask for the information needed to verify the number of children in a household and for planning for how many meals to prepare

Let families know of your summer meal plans as early as possible.

In very rural areas, consider distribution points from a number of locations to lessen the distance that households must travel to pick up meals.

Work with other organizations within your community to spread the word about all summer meal opportunities.

Thank you for listening the webinar. Please contact us at [sfsp@dpi.wi.gov](mailto:sfsp@dpi.wi.gov) to get started!

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Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).