

### Welcome!

Non-Congregate
Summer Feeding: 2024
Lessons for Summer
2025

Presenter: David Dierksen







### Meet our Speaker!

Non-Congregate Summer Feeding: 2024 Lessons for Summer 2025



**David Dierksen**Manager of Policies and
Procedures

Texas Department of Agriculture



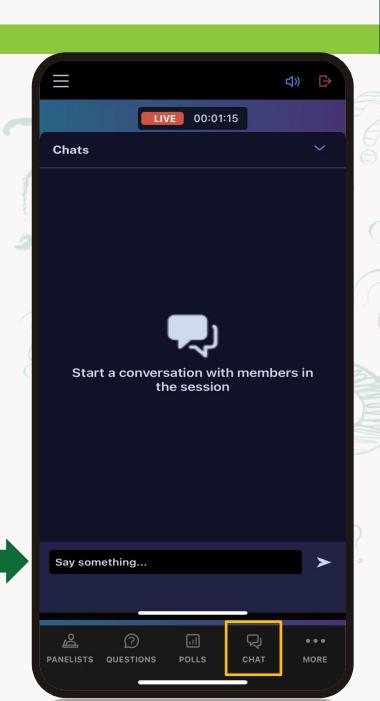
#### **Acknowledgement Statement**

You understand and acknowledge that:

- The training you are about to take does not cover the entire scope of the program; and that
- You are responsible for knowing and understanding all handbooks, manuals, alerts, notices, and guidance, as well as any other forms of communication that provide further guidance, clarification, or instruction on operating the program.

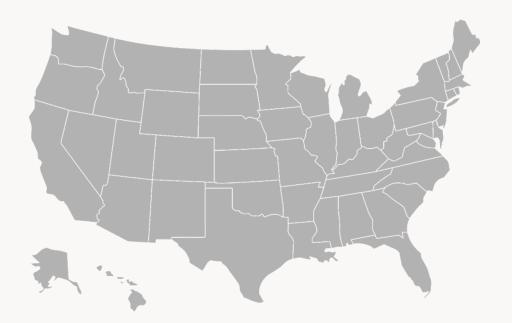


### Submit ALL Questions Via The App



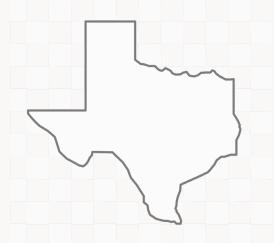


There is **ONE** set of regulations for **FIFTY** states!





Non-Congregate regulations allow for a lot of state discretion.





Each state has different needs, infrastructure, and issues!



Be careful how you process information overheard at conferences!



Listen to TDA!





This concludes the disclaimer portion of the presentation!



Summer Non-Congregate in Texas – The Challenges

Non-Congregate Flexibility Implementation

**Best Practices and Strategies** 

**Tools and Resources** 

### Objectives

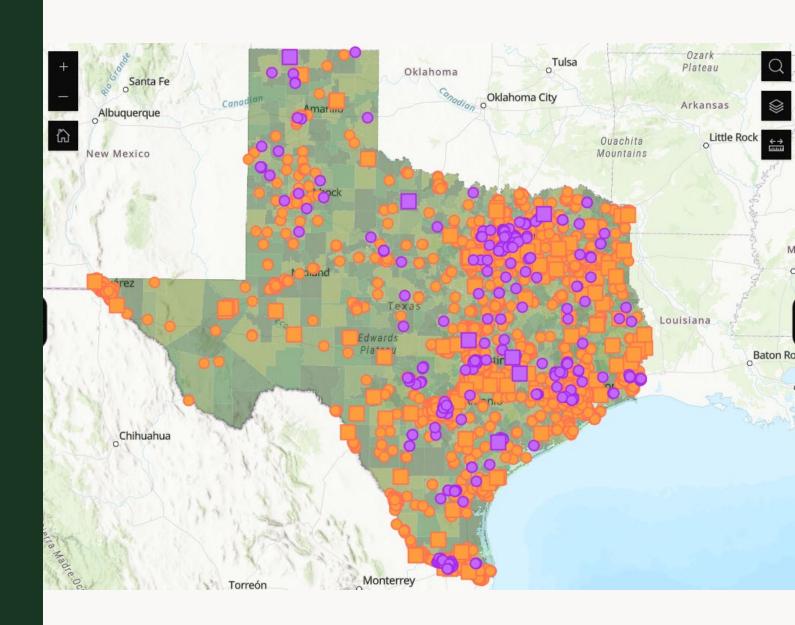


# Summer Non-Congregate in Texas- The Challenges





# Texas is pretty BIG!





### **Summer Participation in Texas – Rural Data**

	2023	2024
Percentage of Total SFSP Sites Considered Rural	11.8%	14.2%
Total Number of Rural Sites Operating SFSP	272	266
SFSP Sites Operating Non- Congregate Service	19 (7% of rural sites)	55 (20.7% of rural SFSP sites)
Number of Meals Claimed at Rural Sites	98,711	279,225



### Value of Congregate vs. Non-Congregate

Pros	Cons
Easier to protect program integrity – only eligible children will receive a meal	Transportation limitations – difficult for parents to get children to sites every day, much less twice a day
Ensures children have a safe space to eat and allows them to get out of the house and socialize	Staffing challenges at the site
	Lack of sites with infrastructure to allow for congregate feeding

### Value of Congregate vs. Non-Congregate

#### In 2023:

- Only allowed a select few school district sites to switch from congregate to non-congregate.
- Non-congregate sites must be 2-miles from the next nearest site.

#### In 2024:

• All SFSP sites eligible to switch from congregate to non-congregate if meeting 2-mile proximity requirement.



### 2-Mile Proximity Exceptions

#### On a case-by-case basis, rare exceptions may be granted for:

- Driving distances of over 2.0 miles to the next nearest site.
- Barriers between sites that would present a challenge for adults in automobiles to visit both easily.
- Meals served at all nearby open congregate or non-congregate sites do not overlap by type or day of intended consumption.
- Site within 2.0 miles is closed enrolled, and the requesting site has provided adequate documentation verifying the two sites are serving different populations.



### **System Constraints**

#### Challenge:

- •System changes proposed by vendor don't meet needs of the state
- •State-specific updates are time consuming

#### **Temporary Solution:**

Online Non-Congregate Request Form (SmartSheets)

#### **Permanent Solution:**

New system



### Operator Challenges BEFORE Non-Congregate Feeding

- Low attendance
- Staffing concerns
- Site limitations
- Cost prohibitive





# Operator Challenges AFTER Non-Congregate Feeding

(Slide 1 of 2)

- Challenging application process
  - Creating menus and procedures well in advance
  - Navigating two separate systems
- Additional Training
  - Meal Counting/Claiming
  - New Requirements
- Cost prohibitive
  - Packaging
  - Technology
  - Delivery costs



# Operator Challenges AFTER Non-Congregate Feeding

(Slide 2 of 2)

- How to ensure a child is receiving the meals.
- How to ensure a child is not receiving duplicate meals or more meals than allowable in a day.
- Food safety and storage after distribution.
- Meal quality and variety.
- Balancing the needs of the site vs. the needs of the community.
- Reporting congregate and non-congregate meals.



# Participant Challenges BEFORE Non-Congregate

- Availability during standard meal service times
- Transportation/Distance



# Participant Challenges AFTER Non-Congregate

- Meal Assembly
- Additional Pick-up Requirements
  - Validating guardianship
  - New pick-up process
  - Availability on distribution days



# Non-Congregate Flexibility Implementation





### **Meal Building**

#### **Utilized Meals:**

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

### If serving over 5 days, TDA requires:

- Sample Menus
- Food Safety Procedures



### **Bulk Food Component Distribution**

#### **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

- Required at time of application:
- Sample menus
- Instructions for meal preparation
- Procedures for ensuring food safety



Distribution of ground beef and other groceries, along with "cooking instructions."

### Allowable?



### USDA Guidance on Bulk Food Component Distribution

Per 7 CFR 225.16(i)(3), in addition to the required food components in the proper minimum amounts for each reimbursable meal being served, bulk meal or multi-day issuance meal packages must include a menu with portion sizes which clearly identifies the food items that make up a reimbursable meal, and preparation directions. Bulk food items provided must require minimal preparation. Bulk meal components being provided as ingredients for recipes that require further preparation such as chopping, mixing, baking, etc., may only be offered with State agency and FNSRO approval.



## Texas Guidance on Bulk Food Component Distribution

Packages must include labeled food items requiring only adding water and warming to be served. While microwaving prepared food with room temperature water is acceptable, foods provided as ingredients for recipes that require chopping, mixing, or baking must not be provided as part of the meal service.

#### Rationale:

- Food safety
- Lack of time or ability for families to prepare meals
- Challenges to implement case-by-case review
- Regional Office has indicated they would not approve



## Parent/Guardian Pick-Up

- Parents or guardians may pick up meals without children present.
- Before approval, sites must provide procedures for validating guardianship and mitigating risk of duplicate meals.
- Only parents or guardians may pickup meals on behalf of their children.





# What's a Guardian?

### USDA Guidance (SFSP 08-2024, SP 15-2024):

State agencies must define guardian for the purpose of non-congregate meal service based on the State's needs... The definition should maintain a caregiver relationship between an adult and a child on the day of meal service.

#### BUT...

Only parents or guardians may pick up meals on behalf of their children. Other adults (i.e., proxies) [even with written permission] may not pick up meals without the child(ren) present.



### What's a Guardian?

### TDA Definition in 2024:

If a child is living with another adult or non-parental relative at any time during the summer (for example, a child is visiting relatives for an extended period), the adults in the household would be considered guardians.



### TDA is expanding its definition in 2025 to include:

A neighbor or other adult who is babysitting the primary child. In this case, the site must have written consent from the primary child's parent that attests to the following:

- The supervising adult is not a licensed childcare professional.
- Care is being provided outside of a formal, organized activity (camp, sports practice).
- The adult is supervising the child on the day of meal distribution.



### Hybrid Congregate/Non-Congregate Sites

Sites can provide both congregate and non-congregate service as long as the services do not overlap, including the intended days of consumption.

All children must receive the same meal type and the same number of meals, packaged the same way, at each service, whether that service is congregate or non-congregate.





# Allowable Hybrid Scenario

Daily congregate meals for both summer school students and community children Mon-Thur.

Non-congregate meal bundles for Fri-Sun sent home on Thursday afternoon.

All children must eat onsite Mon-Thur, even the non-summer school students. This is considered a hybrid site.



# Unallowable Hybrid Example:

Some kids are fed congregate meals daily while other children receive a multi-day bundle for the week on Monday.



# Loophole Alert!

### Summer school occurring Monday through Friday

Non-congregate bundles for both summer school students and community children provided **daily**.

- Community children allowed to pick up meal bundles and leave.
- Summer school students pick up the noncongregate packaged meals and return to classroom or other setting.

This is not considered a hybrid site. The students' meals are considered non-congregate, even if eating together onsite





# Loophole Alert!

## Summer school occurring Monday through Friday

Non-congregate bundles for both summer school students and community children provided daily.

- Community children allowed to pick up meal bundles and leave.
- Summer school students pick up the noncongregate packaged meals and return to classroom or other setting.

This is not considered a hybrid site. The 'students' meals are considered non-congregate, even if eating together onsite.

The meals are packaged in the same to-go format that the community children received.

The children are not being forced to congregate for meal service. They can choose to eat now or take the meal offsite.

NC meals can be taken offsite, but they don't have to be.



## Strategies and Best Practices





## **Multi-Day Bundling Considerations**

## More days of meals at each distribution =



#### **PRO**

- Fewer trips required by parents
- Less time required of staff at the site

#### CON

- Children miss out on more meals if their family misses a distribution.
- Potential food safety and storage concerns



#### **Meal Service Time Considerations**

- Use familiar distribution schedules.
- Maximize the availability of parents to pick up meals.
- Be wary of lengthy meal distribution windows!





# Meal Building Considerations

- Offer fruits and vegetables that are washed, cut, and ready to eat.
- Provide menus and instructions using pictures and in the primary language spoken at home.
- Consider access to kitchen appliances and cooking tools.
- Offer foods that are pre-washed or precooked. Provide food safety instructions using pictures.





### **Food Quality Considerations**



- For sandwiches and wraps, package bread separately from sandwich fillings and provide assembly instructions.
- For pre-made salads, package dressings separately from salad greens.
- Avoid stacking meals to prevent damage.





# Mobile Route Implementation

- Allows sponsors to strategically target locations in a region that would minimize travel times for families.
- Not home delivery children pick up G&G meals from the route stop.
- Each stop must meet individual site requirements.



## Mitigating Risks of Duplicate Meals

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

- · Sign-in sheets.
- Coordination with other nearby sites (ex. cross-referencing sign-in sheets).
- Technology-based solutions, such as specific 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.



## **Pre-Registration Systems**

- Allows for better meal preparation
- Obtain parental consent for home delivery
- Assign guardianship for a child
- Can prevent duplicate meals at that site or another site run by the same sponsor





## **Pre-Registration Systems**

- Must not be a pre-requisite for serving meals.
- Communicate that meals are served on a first-come, first-serve basis, and are not limited to families who registered.
- Document your procedures.





# Staffing and Location Considerations

Carefully consider ALL impacts of the method and times of distribution

- Is there enough staff to handle increased demand?
- Adequate parking?
- If using drive-thrus, can the site accommodate a long line of cars?

Ensure distribution location matches location on site application

Develop clear, accurate signage at the site (and other printed resources)





# Proximity Considerations

# If you plan on closing sites from last year to centralize a non-congregate service:

- Research if participation will likely increase.
- Consider impact of removing congregate sites.







# Site Staff Training!

#### Non-Congregate requirements:

- Different models available
- Bulk distribution vs. unitized bundling
- Parent/guardian pick-up and verification requirements
- Meal pattern refresher
- Meal assembly
- Documentation training (meal count forms, meal production records)



## Tools and Resources





# State Agency FAQs

#### Frequently Asked Questions Summer 2025 Rural Non-Congregate Feeding Option

#### TABLE OF CONTENTS

#### OVERVIEW

- 1. What is the 2025 Rural Non-Congregate Feeding Program?
- 2. Who is eligible to participate in the Non-Congregate Feeding Program?

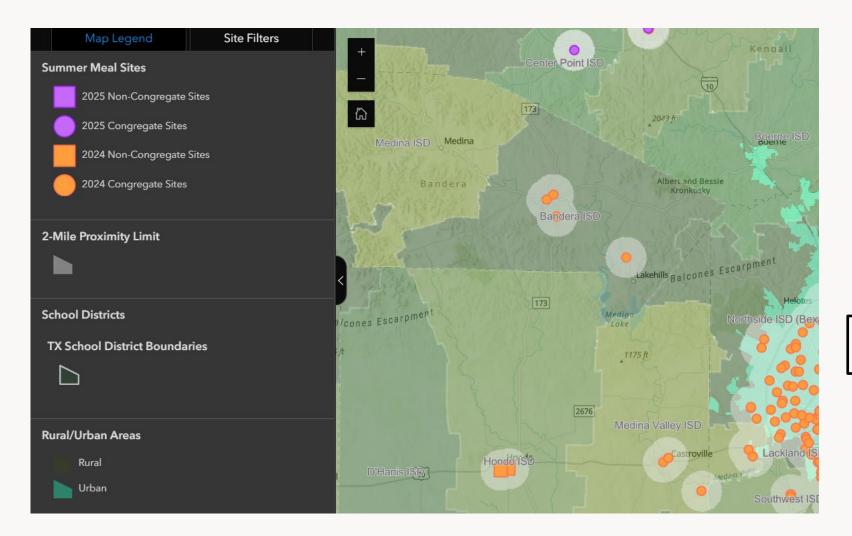
#### **RURAL DESIGNATION & AREA ELIGIBILITY**

- How does TDA determine if a site is rural?
- 4. 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?
- 5. Can I serve non-congregate meals in rural areas that are not area eligible as determined by the percent of children in the area receiving free or reduced-price meals?
- Are there participant notification requirements for a conditional noncongregate site?
- 7. Can I use child nutrition funds to procure and prepare non-reimbursable meals at conditional non-congregate sites?

State Agency FAQs



## Summer Rural Non-Congregate Eligibility Map



Eligibility Map



# Onsite Review Forms - PreOperational Review

E	Summer Food Service Program													
	Site	Site Name: Site Number:												
	Site	Contact Name:		Title:										
	Site	Address:												
	Tele	ephone:												
	Тур	es of <u>Site</u> :												
	:	☐ Recreation Center ☐ Residential Camp ☐ Healthcare												
		☐ School ☐ Play street ☐ Library												
		☐ Church ☐ Playground ☐ Home Delivery Center												
		☐ Park ☐ Settlement House ☐ Rural Development (RD) /												
		Housing & Urban Development												
‡*	F-11		J al			_								
Additional questions if the site is approved to serve non-congregate meals:  Yes  No														
ı	Adequate pack	caging for distributin	ng off-site meals?											
ı	Distribution sc	hedule aligns with in	nformation submitted	to TDA on Non-Congregate	П									
	Request Form				_	_								
ŀ	If home delivery, parental consent obtained for each household on the route?													
ŀ	If home delivery, each house verified to be in a rural area?													
1				sample instructions been	$\overline{\Box}$									
	developed?				_	_								
	If issuing multi	ple days of meals ar	nd/or allowing for pare	nt/guardian pick-up of meals,										
				vent duplicate meal service										
	and, if applicat	ole, verifying guardi	anship of the adult?											



# Onsite Review Forms-First Two Week Site Visit

#### Sample First Two Weeks Site Visit Form Summer Food Service Program

	Date of Site Visit: Monitor's Arriva	al Time	:	re Time:	
	Site Name:		Site Nu	mber:	
	Site Contact Name:		Title: _		
	Site Address:				
	Discussion with site staff (list names):				_
	Areas for discussion:		Yes	No	Notes and Observations
	Has the site supervisor attended training sessio	n?			
	Are meals being counted and signed for?				
	Are all required records being completed?				
	Are <b>congregate</b> meals served as second meals excessive?				
	Areas for discussion if a No	on-Cor	ngregat	e Site	
Adequate p	packaging for distributing off-site meals?				
	n schedule aligns with information				
ubmitted t	to TDA on Non-Congregate Request Form?				
f home del	livery, parental consent obtained for each				
nousehold	on the route?				
f home del	livery, each house verified to be in a rural				
area?					
f distributi	ng food components in bulk, are				
	e menus and meal assembly instructions				
peing sent	home with bundles?				
f issuing m	ultiple days of meals and/or allowing for				
parent/gua	rdian pick-up of meals, is the site following				
	submitted to TDA to prevent duplicate				
	e and, if applicable, verifying guardianship				
of the adul					
	both congregate and non-congregate				
	he same time, is the site ensuring that the				
	nt services occur at different times and				
	ys and times of intended meal on do not overlap between the two				
consumpτιο services?	on do not overlap between the two				
et vices:					

#### **Onsite Review Forms – Full Site Review**

#### 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:		Title:											
Site Address:		Telephone:	Telephone:										
Date of Visit:		Site Supervisor:											
Monitor's Arrival Time: _		Monitor's Departure	e Time:										
□Open Site	☐ Closed Enrolled	☐ Camp Site	☐ <mark>Conditional Non-</mark> 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?



#### **Meal Count Forms**

M	MEAL Non-Congregate Meal Count Form – Meal Bundling															May 2024									
Site Name: Address:_										ss:	Telephone:														
Supervisor's Name: Delivery T										y Time:	:		-				Dis	tributio	n Date:	/_	/_	_			
Non-Co	Non-Congregate Service (Circle): Grab and Go / Home Delivery																								
Total M	eals ava	ailable	- Ente	r for tl	he applic	able me	al type	being d	istribute	ed in ea	ch bund	dle: Bre	eakfast _	L	unch _	Sna	ack	Supp	oer	_					
A)	How i	many d	ays' wo	rth of	meals (c	ircle on	e) are b	eing bu	ndled a	t this d	istributi	ion?					Circle th	ne days	of inter	ded me	al cons	umption	ก:		
	1 2	3 4 5	6 7	8 9	10															Sa (Wee					
Su M T W Th Fr Sa (Week 2, if a														pplicab	le)										
B) Circle the daily meals included in each bundle (no more than two meals or one meal and one snack – lunch and supper not an allowable combination)																									
	Breakfast Lunch Snack Supper																								
C) Child	C) Children Served Complete Bundles																								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	
26	27	28	29	30		32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	
51	52	53	54	55		57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	
76	77	78	79	80		82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	
101	102	103	104	105		107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	
126	127	128	129	130		132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	
151	152	153	154	155		157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	
176	177	178 203	179 204	180 205		182 207	183 208	184 209	185	186 211	187	188 213	189	190 215	191	192 217	193	194 219	195	196	197	198 223	199 224	200 225	
201	202 227	203	204	230		232	233	234	210 235	236	212 237	238	214 239	240	216 241	242	218 243	244	220 245	221 246	222 247	248	249	250	
D)			<del> </del>		types dis	<del></del>		<del> </del>			<del> </del>		<del></del>			<del> </del>	243	244	243	240	247	240	243	230	
",					x 100 chi			•				_				_									
E)					ts for eac										ildren 9	Served 4	- Additi	onal Inc	lividual	Deviati	ions Do	cument	ed in Pr	art F on	
					plicable				_		_										Olis Do	cament			
Enter Da			<u> </u>	• •	Enter Da			<u> </u>		_		Enter		michiae		ter Day	<u> </u>				er Day	Ente	r Date:		
# of (circ					# of (circ	. —			_					o):								one: Br Lu Sn Sup):			
# of (circ					# of (circ																# of (circle one: Br Lu Sn Sup):				
	_					_					_					_									
Enter Da					Enter Da								Date:			ter Day_					Enter Day Enter Date:				
# of (circ					# of (circ								u Sn Sur		# 0	of (circle	one: Br	Lu Sn Si Lu Sn Si	nb):	_   # of	# of (circle one: Br Lu Sn Sup): # of (circle one: Br Lu Sn Sup):				
# of (circle one: Br Lu Sn Sup):										ne. Di L	u on ou	۳۰													



#### **Meal Count Forms**

Non-Co	Non-Congregate Service (Circle): Grab and Go / Home Delivery																							
Total N	Total Meals available - Enter for the applicable meal type being distributed in each bundle: Breakfast Lunch Snack Supper																							
A)	) How many days' worth of meals (circle one) are being bundled at this distribution?														Circle the days of intended meal consumption:									
	1 2 3 4 5 6 7 8 9 10														Su M T W Th Fr Sa (Week 1)									
															Su M	T W	Th Fr	Sa (Wee	ek 2, if a	pplicab	le)			
B)	B) Circle the daily meals included in each bundle (no more than two meals or one meal and one snack – lunch and supper not an allowable combination)																							
	Brea	kfast L	unch S	Snack S	Supper																			
C) Children Served Complete Bundles																								
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75
76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100



# FOR THOSE ABOUT TO SERVE... WE SALUTE YOU!







### Leave Us Feedback In The App!



2:03 C

.. LTE 95%

Skip

Submit

Session feedback

1. Session Rating



- 2. The content is relevant to my current role and applicable to my daily work
- Agree
- Disagree
- 3. I feel confident in applying the knowledge gained in this presentation. \*
- Agree
- Disagree
- 4. The presenter's delivery of the content was effective. \*
- Agree
- Disagree
- 5. The session was engaging and interactive.
- Agree
- Disagree
- 6. The presenter encouraged questions and discussions.
- Agree
- Disagree



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, 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: <a href="https://www.usda.gov/sites/default/files/documents/ad-3027.pdf">https://www.usda.gov/sites/default/files/documents/ad-3027.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

This institution is an equal opportunity provider.





