Oregon Department of Education Child Nutrition Programs (ODE CNP)

Rural Non-Congregate Meals Guidance and Q&A for Summer 2023

**Non-Congregate Implementation:**

1. **In 2020 and 2021 I operated non-congregate meal service. How is Summer 2023 different?**

Non-Congregate meals during the pandemic and non-congregate meals in Summer 2023, are different. In 2020 – 2022, the purpose of the non-congregate waivers, were to ensure safe access to meals across the state. In Summer 2023, the non-congregate option is not intended to replace congregate meal service sites and is limited to rural areas. The purpose of non-congregate meals for Summer 2023 is to ensure participants in areas that do not have access to a congregate site, are able to access summer meals. This guidance is only specific to Summer 2023, as interim final regulations for 2024 and beyond are expected in December 2023. On the last page of this guidance we have created a comparison chart to compare the difference between 2020 – 2022 Non-Congregate Operations vs. Summer 2023 Non-Congregate Operations.

**Site Eligibility:**

1. **Can an SFSP/SSO site located in an urban area serve non-congregate meals in summer 2023?**

No. Non-congregate meal service is only allowable in eligible rural areas.

1. **How is a site determined to be in an eligible rural area?**

A site must be identified as being in a rural area using either the [Rural Designation Map](https://www.fns.usda.gov/sfsp/rural-designation) or the [Rural Development Tool](https://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do). A site located in a rural area must also meet area eligibility or participant eligibility requirements based on the type of site operated.

1. **Where is the current area eligibility data located?**

Area eligibility data is available in several formats under the Determining Program Eligibility section of the [ODE CNP Summer Food Service Program](https://www.oregon.gov/ode/students-and-family/childnutrition/sfsp/Pages/default.aspx) Webpage. These include:

* [Free and Reduced Price Eligibility List – October 2022 Data](https://www.oregon.gov/ode/students-and-family/childnutrition/sfsp/Documents/2023%20Site%20Eligibility%20for%20CACFP%20and%20SFSP.pdf) – sites must be located at or within the attendance boundary of a school with at least 50% Free/Reduced Price eligibility if using this option for area eligibility.
* [FNS Area Eligibility Map](https://www.fns.usda.gov/area-eligibility) or [FRAC Map](http://www.fairdata2000.com/SummerFood/) – sites must be located in a census block identified as eligible. Sites located in a non-eligible census block surrounded by eligible census blocks may use the [Area Eligibility Worksheet](https://www.oregon.gov/ode/students-and-family/childnutrition/sfsp/Documents/area-eligibility-worksheet.xlsx) to determine if the site may be eligible.
1. **My school is a CEP school. Does it qualify as an area eligible school?**

Possibly. Please refer to the [Free and Reduced Price Eligibility List – October 2022 Data](https://www.oregon.gov/ode/students-and-family/childnutrition/sfsp/Documents/2023%20Site%20Eligibility%20for%20CACFP%20and%20SFSP.pdf) to determine if the school qualifies.

**Recordkeeping:**

1. **When are we required to use Actual Meal Count versus Head Count?**

Actual Meal Count is completing a meal count by participant’s name. When serving meals non-congregate it is a best practice to use Actual Count versus Head Count (Daily Meal Count Form), however, it is not required when operating SSO or SFSP, unless you are using the home delivery model, operating a camp, or in instances where serving all participants, but only able to claim Free and Reduced Price eligible participant meals. If a sponsor is operating NSLP, sponsors are required to complete the meal count by name, unless approved to operate CEP or Provision 2 non-base year.

**Meal Service:**

1. **Who is allowed to complete meal pick up?**

Best Practice for meal pick up is for parents/guardians to arrive with the child present. However, with a way to ensure the participant receives the meal, others who have been approved to complete meal pick up, can with sponsor permission. ODE CNP recommends that the sponsor maintain documentation from the parent/guardian if someone other than them are pick up meals for the participant.

1. **Can Childcare Providers or Camp Counselors pick up meals**?

No. However, sponsors can work with child care providers, and camps to set them up as a site under the program, as long as the site is eligible. Non-Congregate meals may not to be used to circumvent congregate requirements.

1. **ODE CNP mentioned collecting documentation on identified persons allowed to pick up. How does this look at an open site?**

This is a best practice, not a requirement. It is the responsibility of the Sponsor to ensure program integrity is intact, meaning, preventing duplicate meals, and that the meals received are for eligible participants. It will be sponsors policy to determine how to best manage meal pick up.

1. **Do participants have to sign up to receive non-congregate meals?**

This will depend on the type of meal distribution, site type, and sponsor policy. Sites providing non-congregate meal pick up to eligible participants are not required to have participants sign up for meal service, but are required to notify potential participants of the availability of non-congregate meals for equitable access. Sites providing home delivery for non-congregate meals are required to have parent/guardian permission prior to delivering meals. Additionally, site types, such as closed enrolled and camps, have requirements for participant enrollment documentation outside of non-congregate meal service.

1. **Does home delivery need to be offered to all participants?**

No. Sponsor may develop criteria to determine which participants are eligible for home delivery and offer this meal distribution option only to those participants.

1. **What methods should be used to get parent/guardian permission for home delivered meals?**

Sponsors are required to obtain and document parent/guardian permission prior to serving non-congregate meals through the home delivery option. The method used to collect this information is up to the sponsor. Recommended methods include online or offline form, email, or documented record of phone conversation. Other methods may be used to meet the requirement.

1. **Can a site utilize offer versus serve (OVS) with non-congregate meal service?**

No. School Food Authority (SFA) sponsors may only utilize OVS at sites during congregate meal service. Non-SFA sponsors may not utilize OVS at all for SFSP.

1. **Can a site switch between congregate and non-congregate during periods of the summer?**

Yes, a site may switch between congregate and non-congregate during periods of the summer. This must be approved in advance and documented on the Meal Distribution Plan.

1. **Can non-congregate meals be served from a Mobile Meals site?**

Yes, but each stop where non-congregate meal pick-up is served must be approved as its’ own SFSP site in CNPweb. Mobile meal routes may not be consolidated under a single site. SSO Sponsors please work with your assigned SNP Specialist.

1. **Can we use bus stops to deliver meals?**

No. Bus stops are not allowable in Summer 2023 per USDA guidance. Sponsors wanting to deliver non-congregate meals along an established route must treat each site as a mobile meal site, see question 15.

**Serving Summer School:**

1. **If we are operating Summer School as a closed enrolled site, do we serve our non-congregate participants at another site?**

Summer School (grade advancement or recovery) cannot be a closed enrolled site in SSO or SFSP unless there are enrichment and educational activities in addition to summer school. Summer school that do not offer enrichment and educational activities in addition to summer school must participate in NSLP. For sponsors operating a closed enrolled site, there are some circumstances that may allow for a non-congregate site to be served nearby.

**Serving Daycares:**

1. **Can we deliver meals to daycares in our area?**

Not under the non-congregate model, however, they can become a closed enrolled site under your sponsorship. It is the responsibility of the sponsor to verify that the daycare is not operating the CACFP.

**Partnerships:**

1. **Can sponsors partner with other organizations to distribute non-congregate meals?**

Yes. Sponsors are encouraged to form partnerships with other organizations to expand the reach of summer meals. Examples include partnering with libraries, school administrators, public safety officers, meal delivery organizations, and foodbanks. Partnering organizations may help through promoting summer meals, hosting site(s), or providing the transportation of prepared meals to meal sites or participant homes. Sponsors must ensure that all sites operating summer meals are eligible and approved by ODE CNP prior to starting operations. ODE CNP encourages sponsors to look for partnerships within their communities and surrounding communities to ensure Oregon children have access to summer meals in their area.

**Miscellaneous Questions:**

1. **Whom should sponsors contact with questions about non-congregate meal service for summer 2023?**

Sponsors with an existing Summer Food Service Program (SFSP) agreement should contact their assigned SFSP Child Nutrition Specialist. This information can be found at the top of the packet tab for the current SFSP fiscal year (FY) in CNPweb. A list of [specialist assignments](https://www.oregon.gov/ode/students-and-family/childnutrition/sfsp/Pages/default.aspx) is also available on our ODE CNP SFSP Webpage. Organizations operating the SFSP may also contact ode.communitynutrition@ode.oregon.gov for assistance.

Current School Food Authorities (SFA) that operate the National School Lunch Program (NSLP) may elect to operate the Seamless Summer Option (SSO). SFAs choosing to operate SSO should contact their assigned NSLP Child Nutrition Specialist. This information can be found at the top of the packet tab for the current NSLP fiscal year in CNPweb. A list of [specialist assignments](https://www.oregon.gov/ode/students-and-family/childnutrition/SNP/Documents/Sponsor%20Support%20List.docx) is also available on our ODE CNP NSLP Webpage. SFAs operating the SSO may also contact ode.schoolnutrition@ode.oregon.gov for assistance.

**Non-Congregate Comparison Chart of Nationwide Waivers versus Summer 2023**

| **Topic** | **2020 - 2022** | **2023** |
| --- | --- | --- |
| Site Eligibility and Site Types | **Open** sites had all area eligibility requirements waived. **Closed enrolled** sites had to meet area or participant eligibility requirements. **Camp** sites serving residential participants were required to collect income applications.  | All site types may be eligible if the following is met. See [SFSP Site Type Comparison Chart](https://www.oregon.gov/ode/students-and-family/childnutrition/sfsp/Documents/SFSP%20Comparison%20Handout%20Accessible.pdf) for information about different site types operated under SFSP. 1. **Rural Area** – the address of the site must be located in a rural area per either:
* [Rural Determination Map](https://www.fns.usda.gov/sfsp/rural-designation)
* [Rural Development Tool](https://eligibility.sc.egov.usda.gov/eligibility/welcomeAction.do?pageAction=CFG)

**AND**1. [**Area Eligible**](https://youtu.be/Wu8l9m13aNk) – the address of the site must be located in an area with 50% Free/Reduced Price eligible participants. Available for open and closed enrolled sites.

**OR**[**Participant Eligibility**](https://youtu.be/isHhmt7tDx8)– Participants attending the summer site are determined eligible based on income and/or categorical eligibility. Available for closed enrolled and camp sites.  |
| Meal Distribution Methods* Meal Pick-Up
* Home Delivery
* Bus Routes
 | **Meal Pick-Up** – Meals were allowed to be picked up from an approved site listed in CNPweb. **Home Delivery** – Meals were allowed to be delivered directly to participant residences. **Bus Routes** – Meals were allowed to be distributed at multiple bus stops along a route that left an approved site listed in CNPweb. | **Meal Pick-Up** – Meals are allowed to be picked up from an approved site listed in CNPweb. **Home Delivery** – Meals are allowed to be delivered directly to participant residences. **Bus Routes** – Not allowed. Sponsors that want to do a mobile meal route with non-congregate meal service must have each stop approved as an individual site in CNPweb.  |
| Multiple Days of Unitized Meals | Sites were approved to serve up to 7 days’ worth of meals at one time. | May be approved to serve up to 7 days’ worth of meals at one time.  |
| Bulk Meals | Sites were allowed to distribute bulk meals  | Not allowed |
| Parent/Guardian Pick-Up | Allowed | Allowed |
| Multiple Meal Types | Allowed | Allowed |
| Integrity Plan | Sponsors were required to have a plan in place to ensure that duplicate meals were not claimed for participants. | Sponsors are required to have a plan in place to ensure that duplicate meals were not claimed for participants. |
| Second Meals | Not allowed | Not allowed |
| How to Apply | Meal Distribution Plan and CNPweb Application | Meal Distribution Plan and CNPweb Application |