



**SUMMER**

**NUTRITION**

**SUMMIT**

JANUARY 23-24, 2024



# Expanding Reach with Program Integrity - Rural Non-Congregate Meals

Tuesday January 23, 2024

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# Agenda

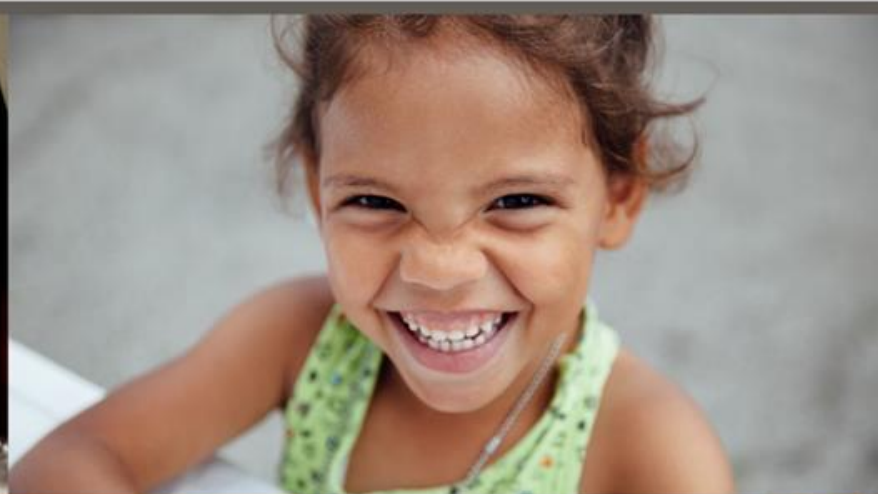
## Welcome & Introductions

- Eleni Towns - Director, State Campaigns, No Kid Hungry campaign, Share Our Strength

## Expanding Reach with Program Integrity

- Marisa Kirk-Epstein - Senior Director, Research, Data and Policy Analysis, Center for Best Practices, Share Our Strength
- Randa Meade, MS, MPH, RDN - Professional Development and Summer Feeding Specialist, Tennessee Department of Education
- Samantha Mozdierz, MSA, RDN, SNS - SFSP Manager Michigan Department of Education

## Table Discussions



## **Marisa Kirk-Epstein**

Senior Director, Research, Data and  
Policy Analysis, Center for Best  
Practices, Share Our Strength



# No Kid Hungry Summer 2023 Non-Congregate State Agency Survey and Debrief

## State Agency Survey

- October/November 2023
- 38 states responded

## State Agency Debrief

- October 2023
- 23 states participated

# Overarching Takeaways

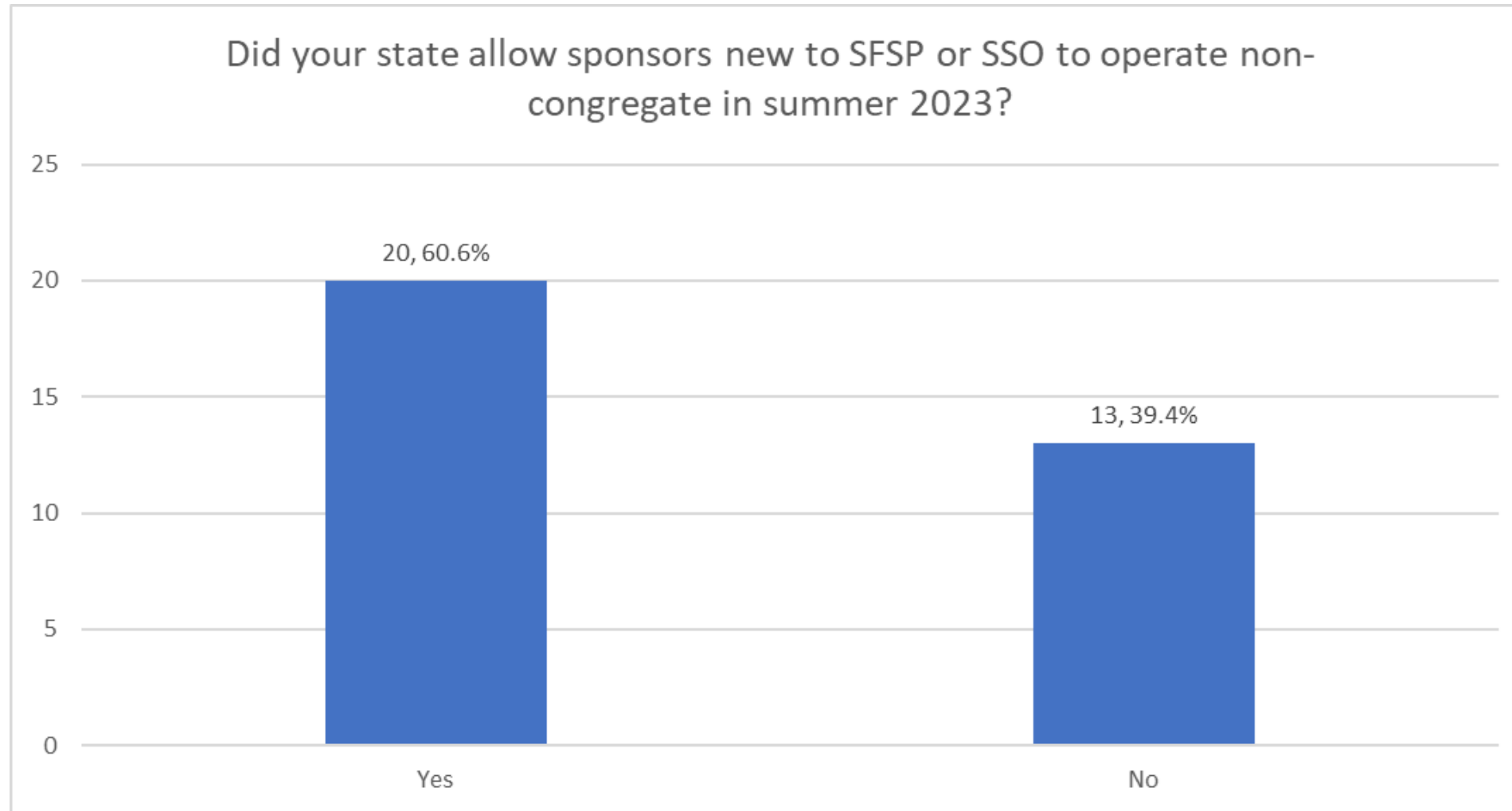
- **Everyone did the best they could with limited guidance and a short time frame**
- **Everyone is still trying to figure this out!**

# State Agency Survey Findings- Maintaining Program Integrity

**What policies or processes did your state put in place in order to maintain program integrity?**

- Limitations on sponsors or meal service model type or other program flexibilities:
  - New and Community sponsors
  - Home Delivery
  - # of days of meals (usually 5-7 days)

# Allowing New Sponsors

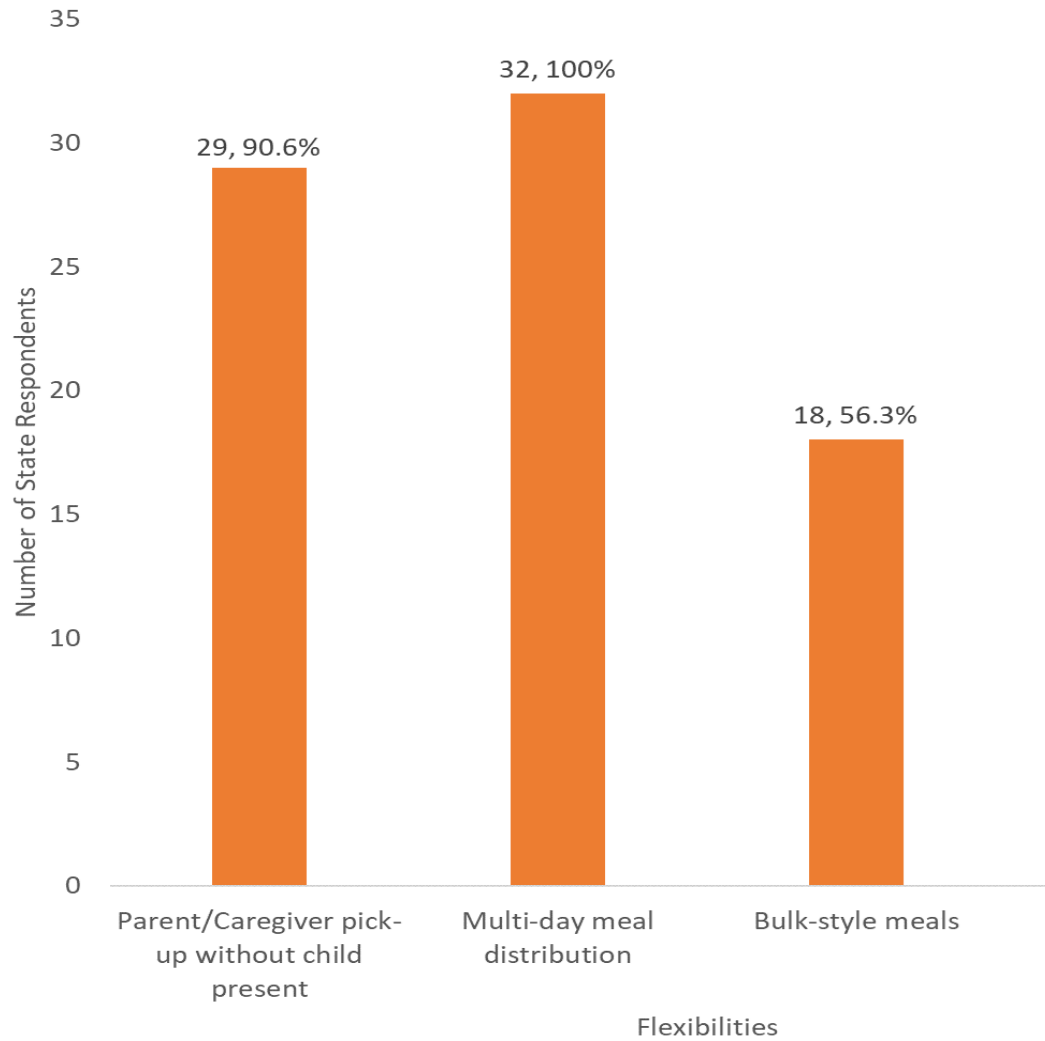


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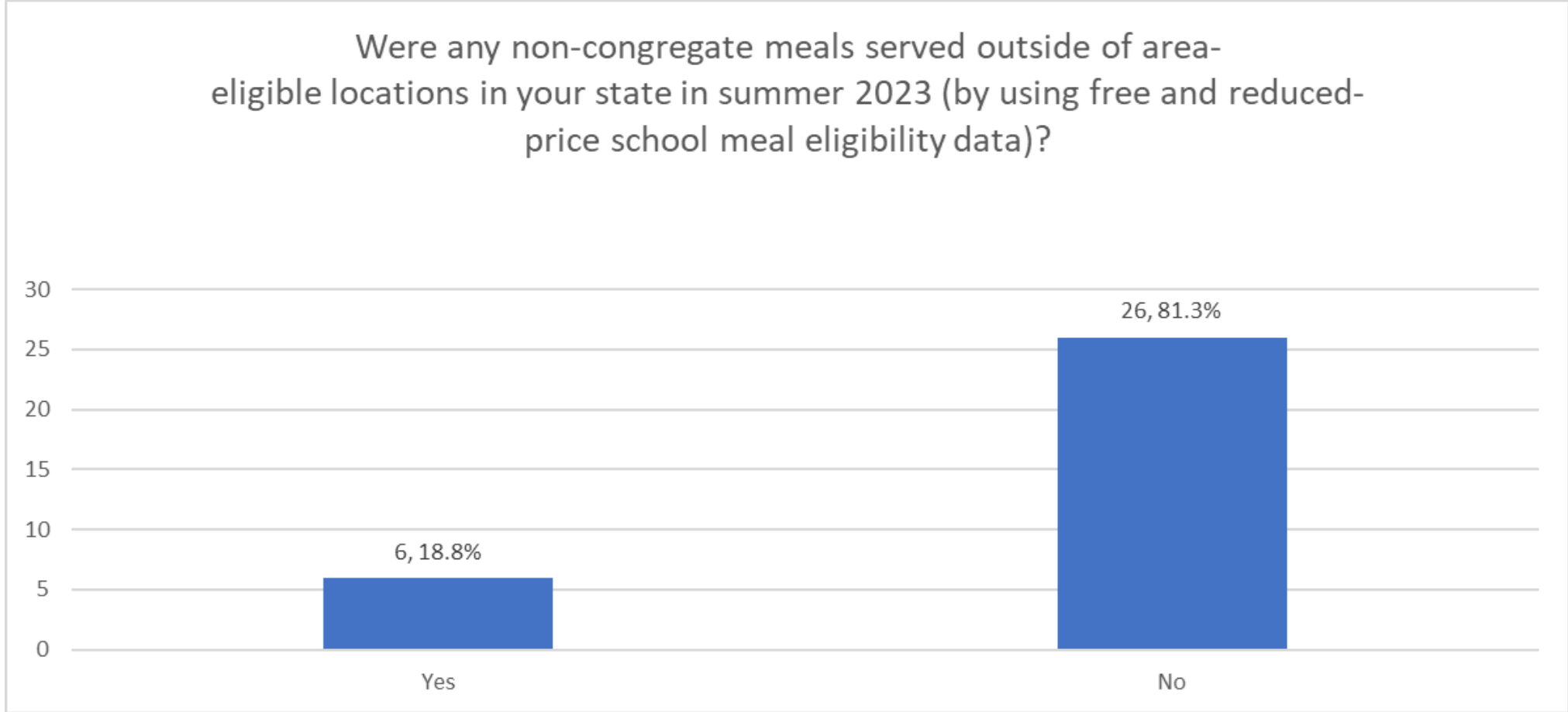
# Allowed Non-congregate Flexibilities



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# Non-Area Eligible Locations



# State Agency Survey Findings- Maintaining Program Integrity

**What policies or processes did your state put in place in order to maintain program integrity?**

- In-person or web-based sponsor training resources
- Site visits, administrative reviews, and/or compliance reviews
- Close communication with sponsors when developing program integrity plans
- Sponsors need to demonstrate how they would avoid duplicate meals
- Menu collection and approvals
- Clear plan for home delivery and identifying families, documenting consent
- Food safety considerations and protocol
- Meal claim assistance for sponsors
- Family applications, rosters, and showing IDs
- Parent agreement that they would not pick up duplicate meals
- Communication to parents that meals were to be consumed by children (child not present)

# Balancing Access and Integrity

- How to prevent integrity measures from becoming a barrier to access?
- When are families required to do too much to access meals?

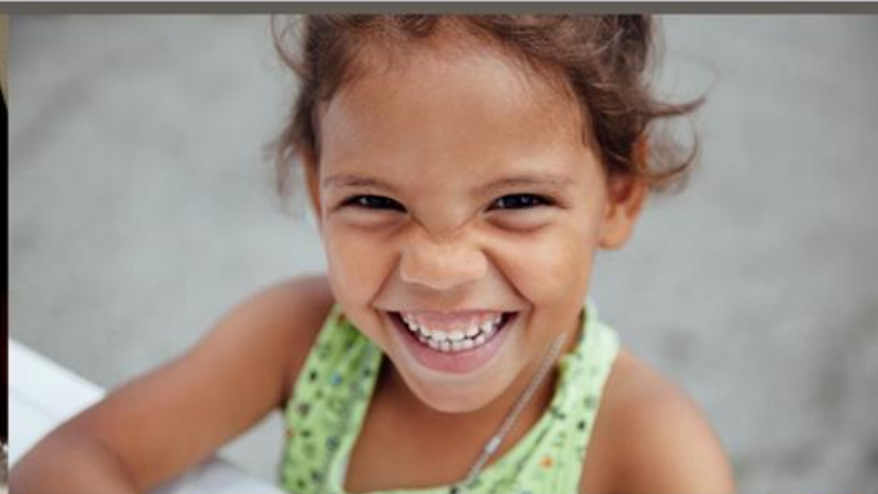
# Defining Access to a Site

**How did your state define “access to a congregate site” in order to determine non-congregate eligibility?**

- Distance (ranging from a quarter mile to 10 miles)
- Presence of a highway or other physical barriers
- If marketing for both site types would be for the same children
- Other sponsor reported justifications or rationale in application

# Opportunities for Idea Sharing and Support

- Defining access to a site, co-locating congregate and non-congregate sites, and preventing duplicate meal service
- Home delivery
- Parent pickup without the child
- Non-area eligible locations/conditional sites



**Randa Meade MS, MPH, RDN -**  
Professional Development and  
Summer Feeding Specialist,  
Tennessee Department of Education



# Compliance that Feels Like Support



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# Application to Participate

- Site name, address, service model
- Describe the process in place to ensure integrity of the program when utilizing non-congregate meal service models.
- How will you ensure that a child does not receive more than the maximum number of allowable meals?
- If implementing a parent-pick up model, how do you plan to ensure a parent or guardian is only picking up one meal per child?



# Tennessee SSO Rural Non-Congregate by the Numbers

- Approved 32 SFAs to operate
- 29 SFAs filed a rural non-congregate feeding claim
- Approved 145 rural non-congregate sites
- 125 sites filed a rural non-congregate claim
- Approved 54 sites in rural pockets
- 1,027,459 rural non-congregate meals served
- 5,211,944 total summer meals served



# Operating Models

- Communication with SFSP team
- Sites operating at the same time to limit ability to visit multiple sites
- Food separated into different color bags based on temperature
  - Red – hot; white – refrigerated; blue – frozen
- Closed congregate sites with open non-congregate sites
- Mobile routes operating as non-congregate to feed more kids
- The onus of program integrity was placed on participants – SFAs made it clear in advertising that one meal type per child per day was allowed.



# Lessons Learned

- Would have asked for more detailed information on operating plans
  - This will be available in the 2024 application packet.
- Non-congregate meal count sheets
- Targeted and pro-active technical assistance to participating SFAs
- Additional training opportunities needed – this was limited due to the timeline of guidance from USDA

## Daily Meal Count Form for Use in Non-Congregate Summer Feeding for Seamless Summer Option (SSO)

Each serving day, every site must take a point-of-service meal count for meals served. Possible meals to be served are breakfast, lunch, morning or afternoon snacks, and supper. A site can serve any combination of two meals except for both lunch and supper. A different form should be used for each meal type.

The following fields should be completed prior to meal service:

- **Site name:** write the name of the summer feeding site
- **Site manager:** write the name of the site manager
- **Serving date:** write the date that meals are being distributed
- **Number of Meals Distributed:** write the number of meals that are being given to each child
- **Intended Consumption Dates:**

The cashier will cross out each number there is enough space to count off 300 children are served, please use the third

After the meal service, complete the field multiply the tally marks by the number

The form should be signed by the site manager

An example of a completed non-congre

### ABC School District

Daily Meal Count Form for Use in Non-Congregate Summer Feeding																										
Site Name: <i>Blue Skies Park</i>								Site Manager's Name: <i>Mary Manager</i>																		
Serving Date: <i>June 1, 2023</i>																										
Number of Days of Meals Distributed: <i>7</i>																										
Intended Consumption Dates: <i>6/1, 6/2, 6/3, 6/4, 6/5, 6/6, 6/7</i>																										
Meal Type (Circle): Breakfast A.M. Snack <u>Lunch</u> Supper P.M. Snack																										
Meals served to children; cross off number as each child is served:																										
<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>6</i>	<i>7</i>	<i>8</i>	<i>9</i>	<i>10</i>	<i>11</i>	<i>12</i>	<i>13</i>	<i>14</i>	<i>15</i>												
<i>16</i>	<i>17</i>	<i>18</i>	<i>19</i>	<i>20</i>	<i>21</i>	<i>22</i>	<i>23</i>	<i>24</i>	<i>25</i>	<i>26</i>	<i>27</i>	<i>28</i>	<i>29</i>	<i>30</i>												
<i>31</i>	<i>32</i>	<i>33</i>	<i>34</i>	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	101	102	103	104	105												
226	227	228	229	230	231	232	233	234	235	236	237	238	239	240												
241	242	243	244	245	246	247	248	249	250	251	252	253	254	255												
Total Meals served: number of tallies <i>34</i> x consumption days <i>7</i> = total meals served <i>238</i>																										
Meals served to paying adults:																										
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	Total adult meals:	
I hereby certify that the above information is true and accurate:																										
<i>Mary Manager</i>										<i>6/1/23</i>																
Signature										Date																

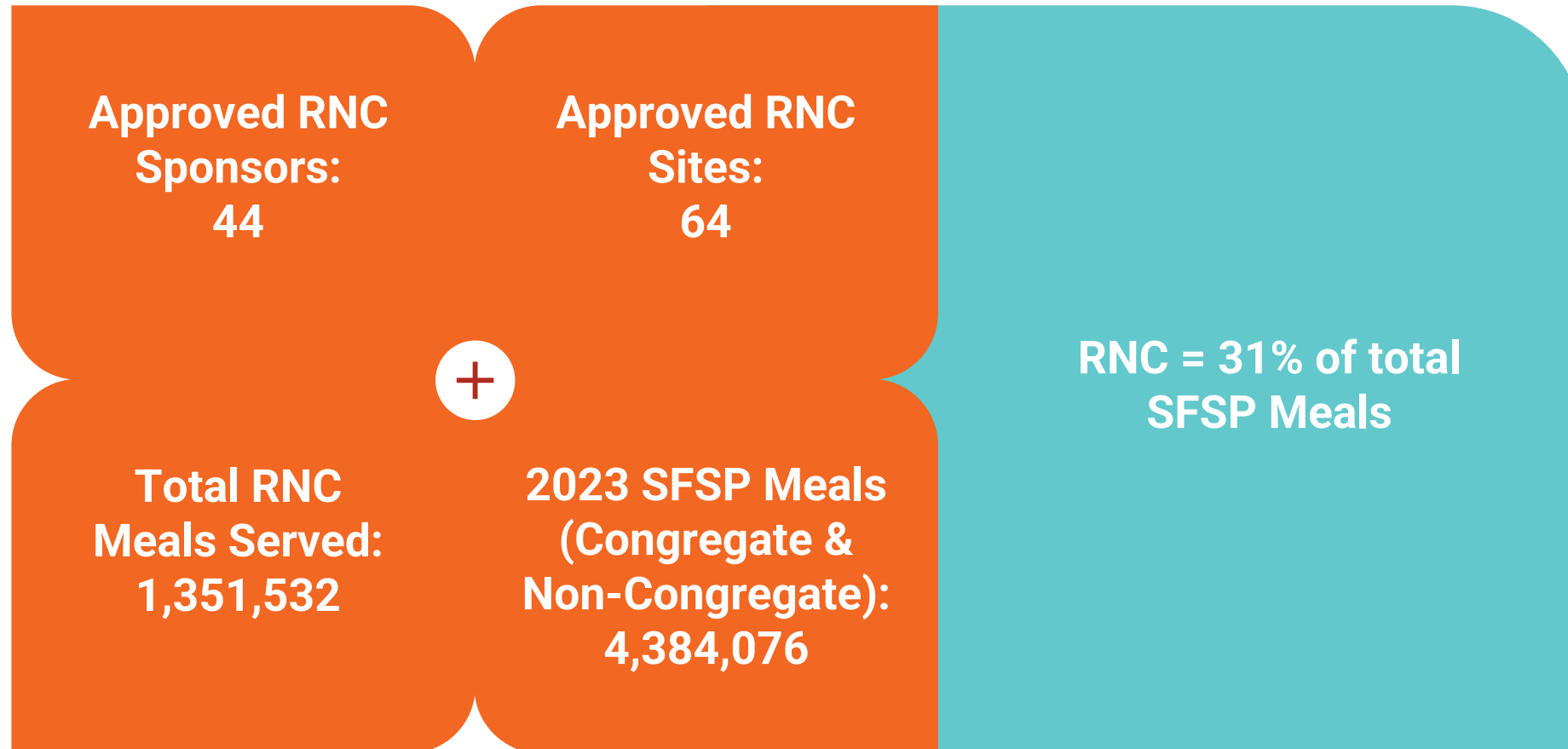




**Samantha Mozdierz MSA, RDN, SNS**  
Summer Food Service Program  
Manager, Michigan Department of  
Education



# Rural Non-Congregate (RNC) for Michigan 2023



# Michigan Process to Participate

Notify MDE of intent to participate

Site Eligibility verified by MDE

Program Integrity plan completion by sponsor

TA call

Attend mandatory RNC webinar

Update Coordinated Application to reflect RNC operations

Placed on Administrative Review List

RNC meal service cannot begin until all steps have been completed

# Program Integrity Plans

Areas of focus:

- Operational Overview
- Equitable Access
- Counting and Claiming
- Meal Quality and Components
- Sample Menu

Program Integrity Plan required for every RNC sponsor.

Plan is built into 2024 application.



# RNC Operations

Distribution Models	<ul style="list-style-type: none"><li>• Daily Meals/ Multiple Meals</li><li>• Mobile Route/ Home Delivery</li></ul>
Parent/Guardian Pick Up	<ul style="list-style-type: none"><li>• Permission slips encouraged</li><li>• Child does not need to be present</li></ul>
Menus/Production Records/ Food Safety	<ul style="list-style-type: none"><li>• Required for each meal when multiple meals provided</li><li>• Safety Instructions included</li></ul>
Access to Congregate Sites	<ul style="list-style-type: none"><li>• Only if no congregate meal service</li><li>• Case by case basis</li></ul>
Bulk Food Items	<ul style="list-style-type: none"><li>• Only allowed for milk and juice</li></ul>

## Successful Models

- If sponsor had multiple sites, encourage them to do same meal service time at all sites to prevent double dipping
- Many sponsors created sign-up sheets (encouraged sponsors to have additional meals available for people who don't sign up)
- Most sponsors chose to do 7 days of meals at one time



# What We Learned

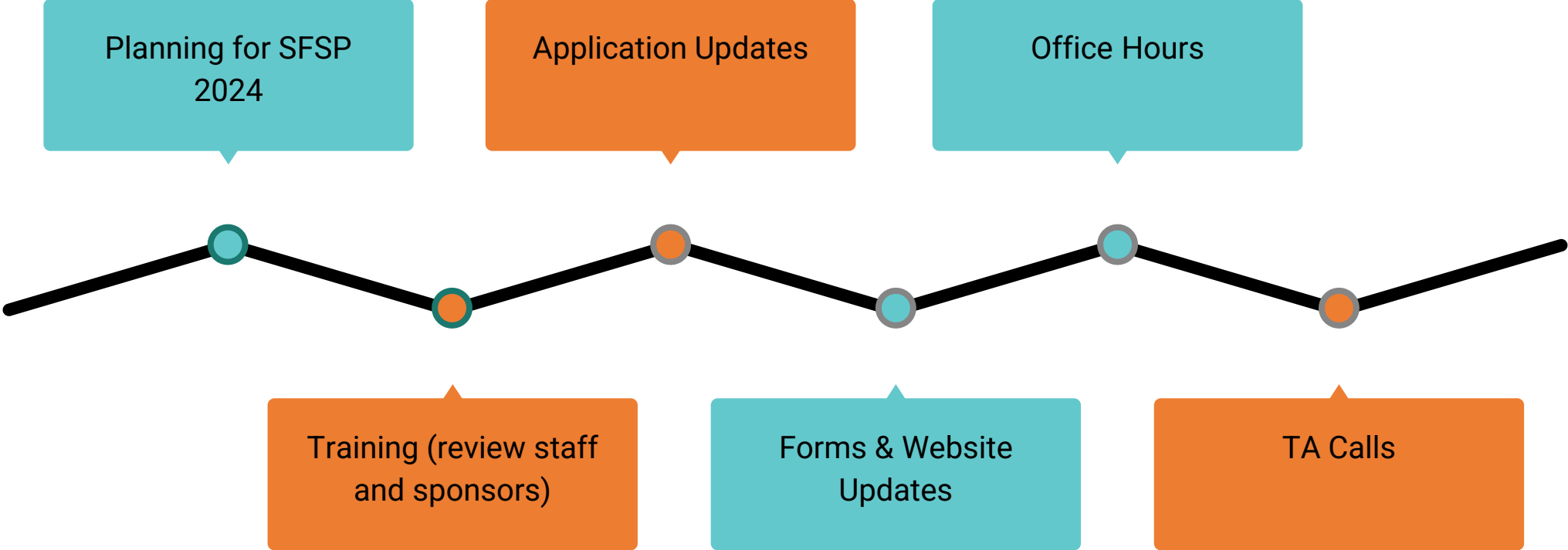
Sponsors are willing to do whatever it takes, if it means getting more meals into children's hands

Rolling out a new program with very little time and guidance felt impossible

The earlier we can build changes into our system, the better

All of the early work has set us up for success year over year

# Next Steps



# Q & A





## Table Discussions Led by NKH Staff