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A Community Guide to Planning Non-Congregate Summer Meals



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Acknowledgements

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Thank you to my loved ones and friends in New Mexico. Shoutout to you Ennedith Lopez! I'm always honored to show how New Mexicans are reaching greater heights, beating all the odds, and defying people's expectations about our potential and capability. Thank you to my lifelong friends who are pursuing their aspirations, cheering me on and giving me your wonderful sentiments. Thank you Katie Breslin for sacrificing your vacation to help me with my Emerson fellowship application. Thank you to all of my mentors, including Erika Schnepf, and everyone else who I still continue to call on for guidance, support, help, and wisdom. Thank you to crowned Miss Oklahoma 2021, Ashleigh Robinson, from being my kind neighbor to my lifelong friend. Thank you to Gabriela Quiroz and Molly Puitz for being my anchors.

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Prologue

This Hunger Free Community Report's purpose is to serve as a toolkit for current and future anti-hunger organizations and nutrition program operators looking to improve or transition into non-congregate programming.

On the next page, you will find a table of content that ranges from non-congregate logistical factors, resources, tips, advice, and tons of community input from non-congregate providers nationwide.

On behalf of Hunger Free Oklahoma and I, we wish you the best of luck in your non-congregate journey. We hope anti-hunger organizations and nutrition program operators can see this Hunger Free Community Report as a resource that you can come back to, reference, and guide you anytime!

With all the utmost earnestly, thank you for leading with kindness, passion, and the vision for a hunger-free world in your anti-hunger work.

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I. Non-Congregate Introduction

“Poverty does not build character. It doesn’t build anything. Poverty only **takes**.”

- Ashley C. Ford (@iSmashFizzle)

DISCLAIMER: Quotes by interviewed Non-Congregate Providers have been condensed and edited for clarity.

When one finds their survival contingent upon enduring social and economic inequalities and injustices on all levels, while knowing resources are abundant, it only makes the underprivileged realities of hunger and food inequality starker and detrimental.

It would be a profound understatement to minimize public schools’ role in American society to only education. Many students who grow up low-income and economically deprived of resources, during such a developmental period in their lives, rely on provided school breakfast and lunches to combat the increasing propensity their families have for food insecurity.

The United States Department of Agriculture’s (USDA) Economic Research Service (ERS) defines food insecurity as “households were, at times, unable to acquire [nutritionally] adequate [and safe] food for one or more household members because the households had insufficient money and other resources for food.”

The USDA ERS defines “hunger” as “the uneasy or painful sensation caused by lack of food.” Due to food insecurity being an **economic condition** deeply intertwined with hunger, the Committee on National Statistics concluded that “resource-constrained hunger...because of prolonged, involuntary lack of food, results in discomfort, illness, weakness, or pain that goes beyond the usual uneasy sensation.” For more information on food insecurity and hunger from the USDA, click here, [USDA ERS - Measurement](#).

According to [Erika Kukura of UC San Diego Recreation](#), hunger can cause:

- Gurgling/rumbling sensation in the stomach
- Empty feeling in the stomach
- Thinking about food, what to eat at your next meal
- Fatigue/Low energy
- Lack of Concentration
- Irritability, frustration, or anger (aka “Hangry”)
- Headache
- Light-headed or dizziness

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Summer meals are integral when schools are non-operational to keep kids fed. Summer meals assist and support low-income families working on tight budgets and provide relief in the form of nutritious meals to kids.

Congregate service providers under the Summer Food Service Program (SFSP) and National School Lunch Program Seamless Summer Option (NSLP/SSO) gather kids at a site and they are physically **required** to eat their breakfast and lunch there. Often, Congregate programming is paired with enrichment and educational activities for children with their meals. In comparison, non-congregate service providers under SFSP and NSLP/SSO do either **curbside grab-and-go (meal) pickup or home delivery** to kids at a site with 5-10 days' worth of meals for them to take home.

Differences between SFSP, NSLP/SSO, and Afterschool Meal Program through the Child and Adult Care Food Program (CACFP) can be found here, provided by the Food Research and Action Center (FRAC):

<https://frac.org/wp-content/uploads/summer-afterschool-program-comparison-chart.pdf>

In non-congregate programming, the USDA Food and Nutrition Service (FNS) sets up the program standards, procedure, and structure, with state agencies responding to the rules and regulations, through their interpretation, allowing for sponsors and sites to be successful in their implementation of their services while complying. Sponsors, like Central Texas Food Bank and Food Bank of Eastern Oklahoma, are the anti-hunger and food insecurity organizations that utilize and oversee their non-congregate programs, with sites being the physical geographic location or public service entity like schools and libraries for distribution of meals.

During the COVID-19 pandemic that erupted the United States into a monumental public health crisis, Congress passed the Families First Coronavirus Response Act of 2020, the Continuing Appropriations Act of 2021, and Keep Kids Fed Act of 2022 that granted the USDA “authority to issue nationwide waivers to ensure access to meals” out of the traditional parameters of congregate feeding, according to FRAC. The distribution of meals was primarily through sites and home delivery. For more information regarding USDA authorized waivers, by FRAC, can be found here: <https://frac.org/wp-content/uploads/nationwide-waivers-1.pdf>

Unfortunately, these waivers were not extended and expired on June 30th, 2022. However, on December 29th, 2022, President Biden signed the Consolidated Appropriations Act of 2023 into law, authorizing non-congregate programming to be permanent and **intended as a back-up plan if congregate feeding cannot take place.** The summer of 2023 would act as a pilot for this latest version of non-congregate programming.

“A lot of [COVID] waivers are over. You can really tell in the community that families are struggling again. And you know, during COVID, you could tell that the [demand] was there because we were distributing lots and lots of meals.” - **Anonymous**

The 2023 piloting version of non-congregate programming required:

- locations that are considered **rural, only in the summer**, and **without access to a congregate site**
- **"Any service institution that meets the definition of "sponsor"** in program regulations is eligible to apply to operate non-congregate meals through their SFSP state agency"
- **MUST meet SFSP meal pattern requirements**
- "The act allows meals to be claimed for any child either located **in an area in which poor economic conditions exist OR meets individual eligibility requirements**. This means that if the rural area is an eligible area, then meals for all children may be claimed for reimbursement. **If the rural site is NOT in an area eligible location, only the meals served to children who qualify for free-or-reduced price meals may be claimed"**
- State Agencies **MUST approve** for sponsors to operate non-congregate meal service according to USDA FNS in their live webinar, on March 7th, 2023, found here: <https://www.fns.usda.gov/sfsp/summer-2023-noncongregate-rural-areas-state-agency-webinar>.

Full transcribed notes of the information disseminated from USDA FNS can be found in the appendix.

This also meant there would be procedural differences to the non-congregate waivers and permanent non-congregate programming, according to FRAC, permanent non-congregate programming would have the following effects on summer feeding, found here:

<https://frac.org/blog/update-on-child-nutrition-waivers>

- Less areas eligible for non-congregate operation
- Reduce flexibility in mealtimes for meal pickup
- Parents/guardians required to have their children present to pick up meals having their children present
- Parents had to provide evidence of their child that they were taking meals to through photo ID, report card, photo in wallet, another step in validating those meals before any meals can be served

For more information on non-congregate programming, please check out additional resources from No Kid Hungry:

- <https://bestpractices.nokidhungry.org/resource/successful-non-congregate-meal-service-models-rural-areas-implementation-guide>
- <https://bestpractices.nokidhungry.org/programs/summer-meals?tab=implementation-strategies#implementation-strategies-5>
- <https://bestpractices.nokidhungry.org/resource/slide-deck-serving-solutions-innovative-approaches-delivering-non-congregate-summer-meals>

During 2020-2022, COVID waivers allowed the implementation of non-congregate programming to be more accessible and easier for non-congregate providers. According to **Shea Boschee, the CEO of Noble County Family YMCA**, due to the switch from waivers to the 2023 piloting version of non-congregate programming, her organization had “learned all these new innovative ways to feed kids, but we are unable to implement any of them.”

The purpose of this non-congregate toolkit, in collaboration with Hunger Free Oklahoma, was to gather, collect, and research information from all sources, organizations, and communities on best practices, solutions, and resources to assist existing non-congregate sponsors and sites increase rural participation, and help organizations transition into non-congregate programming in rural areas for the upcoming 2024 summer smoothly and easily.

Most of the qualitative research gathered was a result of interviews from various anti-hunger and food insecurity organizations who shared their valuable experience, expertise, perspective, insight, advice, wisdom, and guidance on the transformative impact of non-congregate programming had in their communities, organizations, and the children and families they serve.

Oklahoma, as a state, is primarily rural. Hence, non-congregate programming, in Oklahoma, and other rural dominated states, would be a game changer to help fill in rural gaps, as an additional resource. However, USDA guidance for 2023 non-congregate piloting was sent out during spring of 2023, not giving a lot of experienced sponsors/site to plan. Hunger Free Oklahoma believes non-congregate, as a resource, has the potential to reach even more kids during the summer, as non-congregate breaks down barriers like transportation to make summer nutrition more accessible and equitable.

Thank you to the following 17 individuals and their respective organizations for being willing to aid in the research efforts and information gathering of this toolkit to continue breaking down barriers and allow non-congregate programming to be more accessible.

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- **Shea Boschee, CEO, and Caity King, Director of Strategic Advancement, of Noble County YMCA, Oklahoma, USA**
- **Krista Neal, School Nutrition Services Director, of Stillwater Schools, Oklahoma, USA**
- **Katy Anderson, Chief Programs Officer, of Roadrunner Food Bank, New Mexico, USA**
- **Kara Moore, Director of Child Hunger Programs, of Lowcountry Food Bank, South Carolina, USA**
- **Joanne Edwards, Lead Coordinator of Our Summer Eats! Program & Lowcountry Food Bank Partner, South Carolina, USA**
- **Sherry Hooper, Executive Director, and Jill Dixon, Deputy Director, of The Food Depot, New Mexico, USA**
- **Jamie Breidenbach, Program Manager, of Missoula Food Bank & Community Center, Montana, USA**
- **Donna Martin, Former Director of School Nutrition Program, of Burke County Public Schools, Georgia, USA**
- **Darren Dunaway, Director of Senior Services, of Human Services Association LA, California, USA**
- **Colleen Almeida Smith, Vice President of Direct Services, of Food Bank of Eastern Oklahoma, Oklahoma, USA**
- **Clarissa Hayes, Deputy Director of School and Out-of-School Time Programs, and Kelsey Boone, Senior Child Nutrition Policy Analyst, of Food Research and Action Center (FRAC), Washington D.C., USA**
- **Brianna Fleming, the Children's Program Manager, at Central Texas Food Bank, Texas, USA**
- **Hilary Brookins, Community Nutrition Manager, and Gwendolyn Watson, Meals for Kids Community Events Coordinator, of Chickasaw Nation Nutrition Services, Chickasaw Nation**

II. Quantitative Findings

According to [Feeding America's Map the Meal Gap tool](#), in 2020, Oklahoma's food insecurity rate was 13% or 514,990 Oklahomans, and in 2021, the Sooner state's food insecurity rate rose up to 14.1% or 561,640 Oklahomans.

In 2023, [Oklahoma's State Department of Education \(OSDE\) Public Records reports](#), the percentage of low income nearly 59% of students or with 390,502 Oklahoman children qualifying for free and reduced lunch.

The [Center on Budget and Policy Priorities \(CBPP\) reports](#), from their Supplemental Nutrition Assistance Program (SNAP) fact sheet, in the fiscal year 2022, helped 650,600 Oklahomans enrolled in SNAP with more than 68% being families with children, more than 32% being families with elderly or disabled loved ones, and more than 39% are in working families. In addition, from the CBPP's analysis of 2020 data from USDA FNS, CBPP found:

- 13.8% of Oklahoman households were food insecure
- 15.6% of Oklahomans lived below the (federal) poverty line
- 21.2% of Oklahoman children lived below the (federal) poverty line
- 10.6% of Oklahoman older adults lived below the (federal) poverty line

FRAC's annual "Hunger Doesn't Take a Vacation: Summer Nutrition Status Reports," allows for analysis and comparison of yearly national participation in summer nutrition programs.

[Hunger Doesn't Take a Vacation: Summer Nutrition Status August 2020 Report:](#)

- "In July 2019, on an average weekday, the Summer Nutrition Programs served lunch to nearly 2.8 million children, a decrease of just over 77,000 children, or 2.7 percent, from July 2018" (FRAC, pg. 5, 2020).

[Hunger Doesn't Take a Vacation: Summer Nutrition Status January 2023 Report:](#)

- "The summers of 2020 and 2021 also demonstrated that children miss out on more than just healthy meals when the Summer Nutrition Programs — and the underlying summer enrichment programs — are not available to them" (FRAC, pg. 3, 2023).
- "While participation grew in July 2021 compared to 2019, participation decreased from 2020 to 2021, despite the same flexibilities being available. This demonstrates that there is not a more opportune time than now to fully leverage the lessons learned during the pandemic to make these programs stronger, streamlined, and more accessible moving forward" (FRAC, pg. 3, 2023).

- “While there was significant growth in the Summer Nutrition Programs in July 2020 and 2021 compared to July 2019, participation in 2021 did not maintain the same increase experienced in 2020, leading to a 10 percent drop in participation between 2020 and 2021” (FRAC, pg. 6, 2023).
- “In July 2021, on an average weekday, the Summer Nutrition Programs served lunch to almost 5.6 million children, an INCREASE of just over 2.8 million, more than double the number of children served in July 2019” (FRAC, pg. 6, 2023).
- “Participation in July 2021 — the second summer impacted by COVID-19 — was less than July 2020. Just under 600,000 FEWER children participated in the Summer Nutrition Programs, despite the same flexibilities being available to sponsors” (FRAC, pg. 6, 2023).
- “The number of SFSP sponsors and sites INCREASED from July 2019 to July 2021. Nationally, 6,425 sponsors (an increase of 878 sponsors from 2019) and 47,975 sites (an increase of 430 sites from 2019) participated in July 2021” (FRAC, pg. 6, 2023).
- US Average Daily Lunch Participation (ADP) in Summer Nutrition:
 - 2019: 2,774,183
 - 2020: 6,182,556
 - 2021: 5,587,252

[Hunger Doesn't Take a Vacation: Summer Nutrition Status July 2023 Report:](#)

- “The pandemic-era waivers that allowed summer meal sites to operate in every community and provided flexibility for meal service operations were technically available for summer 2022, Congress did not extend the waivers until the end of June. For many sponsors, it was too late to implement the flexibilities, and they were utilized to a much smaller extent than in previous summers, resulting in fewer sites operating” (FRAC, pg. 2, 2023).
- “In July 2022, on an average weekday, the Summer Nutrition Programs served lunch to almost 3 million children, a DECREASE of almost 2.4 million children compared to July 2021” (FRAC, pg. 5, 2023).
- “Participation in July 2022 was slightly HIGHER than pre-pandemic levels. 201,459 additional children participated in July 2022 when compared to July 2019 (the last summer before the pandemic)” (FRAC, pg. 5, 2023).
- “The number of SFSP sponsors and sites DECREASED from July 2021 to July 2022. Nationally, 4,552 sponsors (a decrease of 1,642 sponsors from 2021) and 35,557 sites (a decrease of 11,442 sites from 2021) participated in July 2022. This decrease in sites may be attributed to the area eligibility waiver that allowed SFSP sponsors to serve meals in areas that did not meet the 50 percent threshold not

being offered until the end of June 2022, which was too late for many sponsors to successfully utilize it” (FRAC, pg. 5, 2023).

- “The number of SFSP sponsors and sites operating in July 2022 was LOWER than that of pre-pandemic levels. In July 2019, an additional 995 sponsors and 11,988 sites operated” (FRAC, pg. 5, 2023).
- US Average Daily Participation (ADP) in Summer Lunch:
 - 2021: 5,364,608
 - 2022: 2,975,642

According to No Kid Hungry’s Webinar, “[Making the Most of a Moment: Non-congregate Meal Service in Rural Areas](#),” on May 2nd, 2023, as they presented their findings on Summer Meals National Data:

- 2021 v. 2019, the number of meals served in July 2021 was double that of pre-pandemic July 2019
- 2021 v. 2020, there was a 27% decrease in summer meals from July 2020 to July 2021
- 2022: Return to pre-pandemic levels



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Hunger Free Oklahoma's own **Hunger Outreach Program Senior Specialist, Treasure Standeford**, [wrote a blog about the transformative impact of non-congregate programming in Oklahoma](#). According to Treasure's blog:

- "Oklahoma served over 20.3 million meals to children and teens through schools, nonprofits, tribal authorities, and camps who ran the non-congregate Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) at 1,379 sites across the state" (Standeford, 2023).
- "After USDA program waivers expired, participation in Oklahoma decreased with 922,000 meals served through SFSP and 1 million meals were served through SSO. A 90% decrease in total meals served from the previous year" (Standeford, 2023).
- "During summer of 2023, seven Oklahoma sponsors took advantage of the newly permanent option, operating around sixty non-congregate sites across the state. Collectively, these non-congregate sites served over 431,000 meals and snacks in rural Oklahoma! Choctaw Nation served over 300,000 meals and snacks to rural children and teens in May, June, and July" (Standeford, 2023).

"There were such big hubs for non-congregate meals that we really would have to go once or twice a week to drop off meals. And it really felt like that wasn't even enough in that first month of serving. Just because word had gotten out and people were really excited and really wanted [non-congregate service]." - **Anonymous**

Food security policies increase access by reducing structural obstacles and financial burdens for families utilizing Summer Meals. Non-Congregate data demonstrates that when families do not need to coordinate transportation multiple days a week and stay on site for youth to access meals, participation increases.

III. USDA Regulations

A. Clarity on Non-Congregate Inquiries/Concerns

With the pilot of the latest version of non-congregate programming in summer 2023, many sponsors and sites had sought clarity on what can be answered from the grayer areas of the USDA 2023 non-congregate guidance issued.

- The distance required between Congregate and Non-Congregate sites is unclear to avoid “close proximity” issues
 - “I will use the town of Wilburton, a very rural town where the Choctaw Nation offered non-congregate and congregate meals this past summer. They had a library site that offered congregate meals, where kids could walk to, and a mile away was a non-congregate site on the side of a hill. Once you went right down the hill, you were in rural Oklahoma, where the cows and the farming went on for miles. They were told that [both non-congregate and congregate sites] were too close [in] proximity, so one would have to be shut down. They chose to have the non-congregate site because they knew it would feed so many more families, but for the kids who could walk in that community to the congregate site, it was closed. They had to make the hard decision on what kids in that community they were going to feed.” - **Treasure Standeford, Program Senior Specialist, Hunger Free Oklahoma**
 - How to show that a non-congregate site is “not competing with a traditional congregate site” while still showing there is a need for available meal resources to serve kids?
- Flexibility/Appeal process in Rural Area Designation for Non-Congregate Eligibility
 - What other data could we look at? What are some other ways we can determine if an area is rural?
 - Can it be case by case basis? Especially if there aren’t any connections to any other resources
 - Are there guidance states can use? What internal criteria are states using?
 - Can testimony from experienced sponsors/sites on the ground be used?
 - How to distinguish rural pockets lumped in with metropolitan areas?
 - Who can sponsors go to talk to at USDA if their state agencies don’t have an answer?
 - “Many more counties that would qualify for non-congregate and would do it if the [guidelines were different]. We knew we would miss out on seeing all our kids if we didn't get [our location to be designated as rural].” -

**Donna Martin, Former Director of School Nutrition Program, of
Burke County Public Schools**

- Would areas where communities have no access to internet/cell phone service be considered rural?
- Would areas where there is a lack of adequate hospitals be considered rural?
- In areas where no kids walk and bike to school, they don't live within a mile of any schools, and most kids live on a dirt road, be considered rural?
- What about trying a Rural Classification system? (i.e., Moderately Rural, Very Rural, Extremely Rural)
- Appeal Process in State Interpretation of USDA Non-Congregate guidance
 - Allowing Public Schools as non-congregate sites
 - The States Agencies' Interpretation is if parents can take their kid there to school, why can't they just sit there and eat their lunch? Why would non-congregate providers need to give families more than one day of meals? If parents got their kid here today, why can't they bring their child tomorrow?
 - "Oologah, Oklahoma would be a prime example of a non-congregate school district sponsor; it is super rural. This school sits directly on Highway 169. I would say most kids are bussed and driven to the district; few live within walking distance of the school district. There are not very many residences in town. They would be a prime setup, assuming they meet the other requirements to serve as non-congregate." - **Treasure Standeford, Program Senior Specialist, Hunger Free Oklahoma**
 - Sponsors had prepared their meals at school kitchens and would have to transport the meals to their non-congregate distribution, creating more coordination to get meals to kids.
- Reducing Administrative Burden on Sponsors
 - Submitting Rural Meal Delivery Locations that don't have full addresses
 - Submitting Rural Meal Delivery Names and Addresses alongside non-congregate application(s) ahead of time, due to States Agencies' interpretation, before non-congregate providers can identify, checklist, verify who exactly to serve for home delivery
 - During non-congregate pickup, when parents arrive, they come and write down the household number of kids. Why is it that for delivery, when sponsors are having to do a pre-application for these households when the grab-and-go drive-thru does not have to do that?

- Why can't sponsors get the addresses of non-congregate home deliveries at the time of drop-off? For grab-and-go, sponsors are filling out their paperwork on hand, at that moment, when they're giving that service.
- Why can't sponsors collect addresses for non-congregate home delivery the first week or two, building out what the plan looks like for who they are serving that summer?
- Does it make sense to do all this work of gathering all these names/information if sponsors are unsure and uncertain if their non-congregate application is going to be approved?
- What internal criteria are USDA/states using to approve non-congregate applications? As a result of non-congregate applications being denied, many children in low-income, under-resourced, and economically deprived communities lose their access to summer meals, not of their own fault, but due to bureaucracy.
 - What can sponsors do to ensure their non-congregate applications can be the most successful in getting approved?
 - How to make signing up, as a sponsor, on SFSP or SSO easier, without having an onerous number of hoops to jump through?
 - How to make other paperwork and reporting documentation easier and less onerous on sponsors/sites?
 - 25-30 hours of a full person's time managing programs, dealing with site visits, and reporting
 - 100s of pages of paperwork. Can the paperwork be simplified?
 - If possible, prefill in basic turnover information for experienced sponsors/sites
 - Is there a feasible way to fill out all non-congregate sites through one application instead of individual applications for each site?
 - There are many barriers that for sponsors, doing the work can be discouraging.
 - The number of kids that can access meals is contingent upon the number of Summer Meals providers offering meals. How do we make Summer Meals a more approachable program to operate for those school districts and organizations that want to improve food security in their community while maintaining program integrity?
 - States adding their compliance, on top of USDA compliance, doubling the compliances non-congregate providers must follow
- Non-Congregate Advocacy
 - Where are the opportunities to improve policy?

- How can we unite and organize our individual organizations, when it becomes increasingly challenging to operate valuable nutrition program(s), to be equipped to advocate to push back and demand solutions that make sense to our implementation?

B. Helpful Tips

- Have pre-scheduled and pre-planned bus routes in case of families are late for meal grab-and-go pickup/delivery or if the driver was late to figure out which route is the closest to them
- With non-congregate meals, can a 5- or 6-year-old cook the food and eat it? Provide specific instructions, a menu for what they should be eating each day, educational materials, and include foods that will get children excited.
- Make the lunch and breakfast look like what children would get at school. Microwaves are the most consistent piece of cooking equipment.
- If feasible, switching over to an online daily meal tracking system can help streamline record keeping.

IV. Eligibility and Outreach

A. Structural Barriers Communities Face that Makes Non-Congregate Necessary

- Many households are working class families, with multiple jobs, and it's still not enough to make ends meet, especially for rent or a mortgage
- Many Americans are going through a housing crisis where cost of living is pretty significant that isn't covered through minimum wage
- When parents are working, children are out of school, it's challenging to get access to meals, especially coming from a tight budget
- When parents are working, bringing their child twice a day for breakfast and lunch, to a spot where they sit down and eat is impossible, requires flexible employer, in comparison to pandemic, grab-and-go was the norm, number of meals/participations increased significantly
- What about parents who have children with disabilities, bringing children twice a day requires varying degrees of mobility challenges
- Rural Destinations and sites are being ignored, they need just as much help as urban destinations, through transportation and other monetary needs to get to the sites that can help rural communities. Rural destinations are not saturated with programming and resources.
- Food Inflation for both low-income families and communities/sponsors and sites
 - “While food prices generally increased about 2% in prior years, they increased about 11% from 2021 to 2022.” - [“Sticker Shock at the Grocery Store? Inflation Wasn't the Only Reason Food Prices Increased” by U.S. Government Accountability Office \(GAO\)](#)
 - “Food prices are expected to grow more slowly in 2023 than in 2022 but still at above historical-average rates. **In 2023, all food prices are predicted to increase 5.8 percent.**” - [“Summary Findings, Food Price Outlook, 2023 and 2024” by USDA ERS](#)
 - “But plenty of other evidence suggests they are a substantial component of inflation.” - [“Food prices are rising at the highest rate in decades. Here's where that money goes” by Irina Ivanova for CBS News](#)
 - “Thanks to a combination of inflation, pandemic-related supply-chain disruptions and tariffs on certain foreign imports, food prices have steadily risen since 2020.” - [“The Cost of Groceries: Are Food Prices Going Up?” by Anna Helhoski for Nerdwallet](#)

B. Compounding Factors of Poverty that adds to the Non-Congregate Necessity

- Same families are sitting in the same generational cycles of poverty
 - Hard to make inroads in communities that are not trusting of social-support systems
 - Better for family’s mental health, non-congregate felt more acceptable
 - “They would tell that staff person how it means for them to pick up meals for the weekend, really heartbreaking stories, now after the [waivers], we are still seeing how critical and important non-congregate feeding is, sadly we can't do it all the time.” - **Caity King, Director of Strategic Advancement, of Noble County YMCA**
- Do families have adequate refrigeration?
- “One site is at a food pantry that's connected to the library, but they can't come to the library every day. This community is so rural that the kids must walk miles. Some kids showed up every day. Some kids showed up once a week. You felt like if I could give them meals for a whole week, I would feel better about what I'm doing. So, if they want breakfast or lunch, they don’t have to come back multiple times a day.” - **Colleen Almeida Smith, Vice President of Direct Services, of Food Bank of Eastern Oklahoma**
- Families don’t have cars; majority of kids MUST use the bus to get to school
- Communities are in food deserts, lack of available nutritious foods, lack of access to a farmer’s market to get fresh fruits and vegetables
- “Data shows us that food oftentimes is the one thing to go because these families would rather pay for their transportation and their housing than they would for food.”- **Brianna Fleming, the Children’s Program Manager, at Central Texas Food Bank**
- “Williamsburg County doesn't have a lot of industry either. Many [parents] physically leave the county to work in other places up to Myrtle Beach, as there is a strong employment presence there. They were not in Charleston where there are a lot of parks, recreational centers, and libraries. Kids stayed at home alone or with grandparents. So [kids] were at home and we needed to get the meals to them rather than trying to get them to come to us.” - **Kara Moore, Director of Child Hunger Programs, of Lowcountry Food Bank**

Below are additional factors that expand the broader picture of poverty that affect Americans today. Each factor is provided with links towards various institutions and organizations, who have done the research, with the intention to reveal more insight and information, and easy access for non-congregate providers interested to learn more about the contemporary state of American poverty.

- Stagnant Wages
 - [“America's Vast Pay Inequality Is a Story of Unequal Power” by David Cooper and Lawrence Mishel for American Bar Association](#)
- Education Inequity
 - [“How COVID taught America about inequity in education” by Clea Simon for the Harvard Gazette](#)
- Unemployment
 - [“Youth Unemployment Is a Problem for Social Mobility” by Isabel V. Sawhill and Quentin Karpilow for the Brookings Institution](#)
- Housing Instability
 - [“Reflections and Commentary on National Fair Housing Month: Blake Turpin” by Blake Turpin for RESULTS](#)
 - [“Millions of Americans Are Housing Insecure: Rent Relief and Eviction Assistance Continue to Be Critical” by Julie Pagaduan for National Alliance to End Homelessness](#)
 - [“The Pandemic Has Exacerbated Housing Instability for Renters of Color” by Jaboa Lake for Center for American Progress](#)
 - [“Housing Insecurity and Homelessness Among College Students” by Natalie Butler and Francis Torres for the Bipartisan Policy Center](#)
 - [“The Rental Housing Crisis Is a Supply Problem That Needs Supply Solutions” by Ashfaq Khan, Christian E. Weller, and Lily Roberts for the Center for American Progress](#)
- Debt
 - [“Poverty and Debt” from the Prison Policy Initiative](#)
 - [“Fees and Fines: The Criminalization of Poverty” by Kiren Jahangeer for the American Bar Association](#)
 - [“How Predatory Debt Traps Threaten Vulnerable Families” by Joe Valenti and Eliza Schultz for the Center for American Progress](#)
 - [“America's medical debt is much worse than we think” by Krysten Crawford for the Stanford Institute for Economic Policy Research](#)
 - [“Student loans, the racial wealth divide, and why we need full student debt cancellation” by Andre M. Perry, Marshall Steinbaum, and Carl Romer for the Brookings Institution](#)

- Rising Costs
 - [“The Nation Has Made Progress Against Poverty But Policy Advances Are Needed to Reduce Still-High Hardship” Testimony of Sharon Parrott, President, Center on Budget and Policy Priorities, Before the House Select Committee on Economic Disparity and Fairness in Growth](#)
- Health Issues
 - [“Poverty is a major public health crisis. Let’s treat it like one.” by Oshan Jarow for VOX](#)
 - [“The Impact Poverty Has on Women’s Health” by Gretchen Borchelt for the American Bar Association](#)
 - [“The Impact of Health Insurance on Poverty in California” by Caroline Danielson, Patricia Malagon, and Shannon McConville for the Public Policy Institute of California](#)
- Racism
 - [“How historical racism influences modern poverty and racial inequality” by Michele W. Berger for Penn Today](#)
 - [“New Poverty and Food Insecurity Data Illustrate Persistent Racial Inequities” by Areeba Haider and Lorena Roque for Center for American Progress](#)
 - [“Racial wealth gap may be a key to other inequities” by Liz Mineo for the Harvard Gazette](#)

“Making sure that [kids] are fed in a matter of all capacities. I am so grateful that the legislation was passed for us to do non-congregate feeding. With the way the economy is right now, there are families that are still struggling, and we don't hear it all, but we see it. When non-congregate feeding legislation is passed, we are feeding more families and children than we realize. It's such a blessing.” - **Anonymous**

V. Funding

A. Private Funders

- Fundraising campaigns can help raise additional funds, to pay, alongside any reimbursement received to cover staff, food, vehicle costs, and administration
- With your own funds, there is flexibility to pay caregivers, guardians, grandparents, whoever bringing those children to that site, dealing with food insecurity, to also eat
- No Kid Hungry
 - No Kid Hungry funding allowed many sponsors and sites to start their own non-congregate trailblazers in their rural communities. Non-congregate providers were innovative with their non-congregate program structure, having homes, the hair salon, daycare centers, churches, and schools as sites to cater to as many children and families as possible.
 - Non-congregate works for rural areas because food security resources are coming directly to the community, instead of placing additional systemic burden on communities to come to the resources, especially, when they are making increasingly challenging choices navigating food insecurity and being low-income.
 - Like the non-congregate waivers, private funding provided a lot of flexibility to design, modify, and adapt the summer program to tailor different rural communities. The potential of non-congregate programming emphasized and showcased **racial equity, culturally relevant proactive and preventative care, and through the togetherness of community-centered solutions and collaboration, change can happen.**

B. SFSP/SSO

- Sponsors have operated under SFSP as a response from the COVID-19 pandemic from the waivers to the permanent version of the program
- Under these programs, it helps sponsors with reimbursement rates to continue sustaining non-congregate programming
- 2023 SSO v. 2023 SFSP Reimbursement Rate Comparison
 - [“SFSP 2023 Reimbursement Rates” \[Effective January 1st, 2023 to December 31st, 2023\] from USDA FNS:](#)

2023 Reimbursement Rates (Combined)

Per Meal Rates in whole or fractions of US Dollars	All States except Alaska and Hawaii	All States except Alaska and Hawaii	Alaska	Alaska	Hawaii	Hawaii
Site Types	Rural or Self-prep sites	All Other Types of sites	Rural or Self-prep sites	All Other Types of sites	Rural or Self-prep sites	All Other Types of sites
Breakfast	2.8250	2.7725	4.5825	4.4975	3.3075	3.2450
Lunch or Supper	4.9500	4.8700	8.0300	7.9000	5.7975	5.7050
Snack	1.1675	1.1400	1.8975	1.8525	1.3700	1.3375

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- [“National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates for School Year 2022-2023” \[Effective July 1st, 2023 through June 30th, 2024\] from USDA FNS:](#)

SCHOOL PROGRAMS							
MEAL, SNACK AND MILK PAYMENTS TO STATES AND SCHOOL FOOD AUTHORITIES							
<i>Expressed in Dollars or Fractions Thereof</i>							
Effective from: July 1, 2023 - June 30, 2024							
NATIONAL SCHOOL LUNCH PROGRAM¹		LESS THAN 60%	LESS THAN 60% + 8 cents²	60% OR MORE	60% or MORE + 8 cents²	MAXIMUM RATE	MAXIMUM RATE + 8 cents²
CONTIGUOUS STATES	PAID	0.40	0.48	0.42	0.50	0.48	0.56
	REDUCED PRICE	3.85	3.93	3.87	3.95	4.02	4.10
	FREE	4.25	4.33	4.27	4.35	4.42	4.50
ALASKA	PAID	0.66	0.74	0.68	0.76	0.76	0.84
	REDUCED PRICE	6.50	6.58	6.52	6.60	6.74	6.82
	FREE	6.90	6.98	6.92	7.00	7.14	7.22
GUAM, HAWAII, PUERTO RICO and VIRGIN ISLANDS	PAID	0.53	0.61	0.55	0.63	0.61	0.69
	REDUCED PRICE	5.14	5.22	5.16	5.24	5.34	5.42
	FREE	5.54	5.62	5.56	5.64	5.74	5.82
SCHOOL BREAKFAST PROGRAM				NON-SEVERE NEED		SEVERE NEED	
CONTIGUOUS STATES		PAID	0.38		0.38		
		REDUCED PRICE	1.98		2.43		
		FREE	2.28		2.73		
ALASKA		PAID	0.58		0.58		
		REDUCED PRICE	3.36		4.09		
		FREE	3.66		4.39		
GUAM, HAWAII, PUERTO RICO and VIRGIN ISLANDS		PAID	0.47		0.47		
		REDUCED PRICE	2.65		3.23		
		FREE	2.95		3.53		
SPECIAL MILK PROGRAM				ALL MILK	PAID MILK	FREE MILK	
PRICING PROGRAMS WITHOUT FREE OPTION				0.2625	N/A	N/A	
PRICING PROGRAMS WITH FREE OPTION				N/A	0.2625	Average Cost Per 1/2 Pint of Milk	
NONPRICING PROGRAMS				0.2625	N/A	N/A	
AFTERSCHOOL SNACKS SERVED IN AFTERSCHOOL CARE PROGRAMS							
CONTIGUOUS STATES		PAID	0.10		0.10		
		REDUCED PRICE	0.58		0.58		
		FREE	1.17		1.17		
ALASKA		PAID	0.17		0.17		
		REDUCED PRICE	0.94		0.94		
		FREE	1.89		1.89		
GUAM, HAWAII, PUERTO RICO and VIRGIN ISLANDS		PAID	0.13		0.13		
		REDUCED PRICE	0.76		0.76		
		FREE	1.52		1.52		

¹ Payment listed for Free and Reduced Price Lunches include both section 4 and section 11 funds

² Performance-based cash reimbursement (adjusted annually for inflation)

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School districts that participate in non-congregate receive about \$0.40 cents more operating under SFSP (\$4.95 in SFSP vs. \$4.50 in Seamless Summer).

C. Grants

- Grants have been used to buy resources and supplies to expand non-congregate program capacity, such as the purchase of outdoor freezer, outdoor cooler, and refrigerated trucks

VI. Equipment and Facilities

A. Vehicle Sourcing

- For smaller organizations, it can be a challenge to acquire food, vehicles, and overall starting infrastructure
 - Where can there be opportunities for coalitions and mutual organizations to develop a system for vehicle sharing?
- Are nutrition program operators able to lease vehicles (like a refrigerated box truck, van) for non-congregate usage for the summer through your connections and network?
 - Do you need to consider other costs like maintenance and gas?
- “A lot of counties didn't know what to do with the money. The superintendent was at a meeting [saying] we're getting 17 million dollars. We bought these refrigerated trucks, and we were able to have the milk company put the milk stored in the refrigerated trucks. We were getting 6,000 half gallons of milk. The truck could be a refrigerator or a freezer. If the buses broke down, that truck was there to go out and deliver meals. We added some options for maintenance plans. We loaned them out to everybody. Anybody that needed them for any reason, we would loan them out because they needed to be driven and used.” - **Donna Martin, Former Director of School Nutrition Program, of Burke County Public Schools**

B. Kitchen Sourcing

- Schools
- Are nutrition program operators able to share kitchens with other organizations?
- Are you willing to share recipes?
- Do you have the financial resources to build your own on-site kitchen?
 - Do you also have the funds to buy your own food?
 - Do you also have funds for an on-site chef, sous chefs, and other cooks?
- What about purchasing rollie coolers?

VII. Community Partnerships

A. Communication between Sponsors/Sites

- **Partnership between Kara Moore, Director of Child Hunger Programs, and Joanne Edwards, Lead Coordinator of Our Summer Eats! Program of Lowcountry Food Bank**

Despite the pervasiveness of poverty and food insecurity, low-income communities nationwide are VERY capable of being self-sufficient. The partnership between Kara Moore and Ms. Edwards began when No Kid Hungry reached out to the Lowcountry Food Bank about piloting non-congregate as an initiative for summer meals. From the beginning, Moore had been very intentional about the sustainability of non-congregate operations, driven by the leadership of community leaders. By allowing communities to have a chance at what they WANTED to do, it allowed Ms. Edwards and Greeleyville residents to develop a community-orientated vision of food security and equity for families, through non-congregate. No one understands better than Greeleyville community members what systemic barriers prevent them from accessing summer meals. The Lowcountry Food Bank supported the leadership of Greeleyville residents to collaboratively build the foundations necessary for everyone to thrive and address inequities. It is important to give communities agency in the issues, like food insecurity, that they are dealing with in their lives, because they know best on what culturally helps and heals.

Under Ms. Edward's guidance, she would circulate applications for families to sign up for non-congregate service to know exactly how many meals to give to families. Based on enrollment, volunteers assembled the meals to send to each non-congregate site in Greeleyville to do grab-and-go, making it convenient for families to go towards their closest meal pickup site. Community-led initiatives that formed under this non-congregate partnership can fulfill the yearning for belonging, acceptance, love, support, connection, and enrichment of community members to be equipped to solve the issues they all face with dignity and mutuality of commitment towards each other. Communities deserve the RIGHT to influence profound and transformative change, in their own capacity, to decide how they want to flourish. It is also important to COMPENSATE community members.

“We did an end-of-summer banquet, where we gave out certificates to all the site coordinators, invited local elected officials, other community leaders to share what we had accomplished, to uplift the success of the leaders in this community who made it all happen. After the first year, [Lowcountry Food Bank] level of involvement became less and less.” - **Kara Moore, Director of Child Hunger Programs of Lowcountry Food Bank**

[\["Grandmas On Our Side" on No Kid Hungry's Youtube Channel\]](#)

- **Central Texas Food Bank**

Central Texas Food Bank (CTFB) opted into non-congregate programming in 2023, in the rural areas of Pflugerville, Leander, Waco, and Bastrop. For context, CTFB has a large footprint of 21 counties in Texas. The best way to get a sense of non-congregate operations is to dive straight in, and only through experience can sponsors and sites have insight on what they do to improve the structure and design of their non-congregate program.

CTFB is a Summer Food Service Program (SFSP) sponsor that operates their congregate and non-congregate sites. They are constantly in communication with their partner sites through newsletters and announcements. CTFB had advertised to their network about the possibility of piloting their own non-congregate program in summer 2023, and about 5 sites came into fruition due to available staffing, infrastructure, and coordination that aligned with non-congregate programming. In CTFB's first summer operating non-congregate, their piloting model did not include 5-10 days' worth of meals, they offered daily grab-and-go meals.

From their pilot non-congregate experience in 2023, Brianna Fleming, Children's Program Manager, at CTFB, explained that their "recruitment efforts for sites are going to be earlier, and more streamlined, starting in late January 2024." Fleming and CFTB are "also being very strategic and looking at partners that have other populations that they serve, like those that are dealing with housing insecurity or even veterans." For summer 2024, Fleming and CTFB will lean in towards multi-day meals as part of their non-congregate model with "partners that have a level of community engagement that we'll be able to market for within their current infrastructure."

What will remain consistent with CTFB is that they will conduct all of the training required to prepare sites for non-congregate programming. Fleming explains from "pre-operational visits, which for new sites is required, walking through what sites' non-congregate style look like, and having sites show us an example of how they would conduct a non-congregate model." Fleming and CTFB are doing everything within their capacity to ensure they are providing quality non-congregate service and every aspect of non-congregate logistics is in compliance with the USDA and their state agency.

By beginning their non-congregate journey, CTFB was able to figure out how to improve the sustainability and longevity of their non-congregate program. Through experience, sponsors and sites can reflect on positive learnings, challenges, impacts, wins, successes, and surprises on procedures, approaches, and recommendations for next year.

VIII. Meal Preparation

A. Hot/Cold Meals

- Frozen meals can be transported and stored safely over longer distances
- Shelf-stable meals also help fill in the summer gap. Shelf-stable meals offer flexibility with no refrigeration required for distributors and families receiving the meals.
- National vendors that offer to do pre-packaged meals that are SFSP approved and meets USDA standards
- Biggest limiter on how many meals could be made was due to how much milk can be carried and how much milk can be received
- Microwavable, heat-and-serve meals
 - A brief of foods: Juice, canned fruit, burgers, cereal, cinnamon rolls, chicken, popcorn, cold sandwiches, chicken nuggets, pizza, strawberries, ham, turkey, cheese, milk, macaroni, peaches, beef jerky, tuna in a can, pancakes, waffles, muffins

B. How many days' worth of meals?

- 5-10 days' worth of breakfast and lunch

C. Private Food Vendors

- TRIO
- JA Foods, <https://www.packagedmealkit.com/>
- U.S. Foods
- Highland
- Department of Defense
- ES Foods
- PepsiCo
- Food for Good Foundation
- From Private Food Vendors, would have:
 - Supply chain issues
 - Trouble with invoices
 - Shipping almost expired foods
- Recommendations:
 - With your local food coalitions, build a master list of pros and cons alongside other sponsors
 - Is there the potential to source from local farmers?
 - Is there the possibility of renting a kitchen for the summer?
 - Sharing recipes with other sponsors
 - For more information about the procurement process, here is information provided directly from the USDA FNS, <https://www.fns.usda.gov/f2s/usda-procurement-regulations>

IX. Distribution Method

A. Grab-and-Go

- Most sponsors did grab-and-go
 - Had ice chests, coolers, insulated bags
 - Biggest issue was traffic control and flow, everyone needs to stay in their vehicle
 - Figure out a good method of communication in case of weather changes that disrupts usual non-congregate routine, what location is a good back-up plan?
 - No supervising kids, no stress of cleaning after the kids, don't have to wait for slow eaters, no policing kids at sites
 - Allowed for more flexibility and a broader range of sites

B. Home Delivery

- Delivery is also an incredible option to connect meals to kids
- What flexibility can there be in place in case it's not tenable to know the addresses as sponsors are trying to map everything out?
- How can it be easier for sponsors to have home delivery as a viable option?

X. Human Capacity

A. Hiring Additional Staff/Coordinating Volunteers

- Loading meals into boxes and into the vehicle doesn't require any skilled labor
- How can we relieve staff of burnout?
- Some sponsors get additional hands through AmeriCorp VISTAs
- Having chefs and registered dietitians helps for food quality and culturally inspired meals
- Is it possible to look through your city, county, state resources, like for bus drivers?
- What about grandparents that are looking for things to do in their spare time?
- Football Players/High School Students

B. Asset Mapping

- What resources do you already have?
- What kind of assessment can you do for non-congregate logistical issues?
- What aspects of non-congregate coordination do you need to outsource?

In thinking what non-congregate logistical factors to consider, future and contemporary non-congregate providers can look towards Brianna Fleming, Children's Program Manager, at Central Texas Food Bank, as she examines "what can we do using our current infrastructure, looking at partners that already receive a delivery from us and working with our operations team to make that work now, going into summer 2024. Because the sites will all be rural non-congregate that will require us to look at more infrastructure, more resources and more vans. How do we make the meals? Do we need more refrigerator space to freeze the meals? And do we need more staffing for the administrative part of it? We are ready to expand while still being sustainable and ensuring that we can run the program and have the funds to run it."

XI. Record Keeping and Reporting

A. Procedures of Grab-and-Go Shared by Operators

Based on the interviews, below are some of the ways that non-congregate operators did their record-keeping:

- Case 1: Gather names, doesn't matter how it is written down, it can be from a sticky note with the kid's names, parents can fill in for one another with this method.
- Case 2: No collection of names or addresses. Trusted their meal coordinators as they planned where the sites are going to be, who we're going to target, and anyone else to add. Coordinators knew the kids they were serving and how to access them, didn't collect any other information except for meal counts, no verification process.
- Case 3: Families had to fill out forms, saying their racial and ethnic identity, name, kids in the household, age, etc. Why not use our county or statewide data that we have in school systems?
- Case 4: Use a form that our state agency provides. The form has things to fill in and check off like date, breakfast, lunch, AM snack, PM snack, and so you circle which meal you are serving. The form also includes numbers all the way through 100 and space for a second meal served, you're just tallying as you serve meals.
- Case 5: Followed standard SFSP reporting, don't require names, just a tally for meal count.
- Case 6: Never required an ID or birth certificate. All self-reporting of first and last names, parent or guardian of the child, age of the child, and how many kids. Site would cross keep track of meals on their daily count sheet.
- Case 7: Rework, modify, and adapt your versions of meal sheets for your state agency to approve. Propose documents that work for your operations for state agency approval. Your state agency might not be prepared, so use your creativity!

Bottom line, if your organization is pursuing non-congregate programming in the upcoming summer, speak with your state agency first about record-keeping procedures, to make sure your organization and non-congregate structure are following USDA guidelines!

XII. Evaluation and Feedback

A. Anecdotes of Families Receiving Non-Congregate Services

- Pride around poverty is a huge struggle and obstacle.
 - “Non-Congregate waivers had people get the nutrition they needed to get by without being held up and seen as accepting this, that was incredible, it meant caregivers can come pick up meals in the neighborhood, it meant more kids could get fed, people were more supportive of the program, they understood it in a way where there's not this awareness of it now, we were building a network of people who cared. They don't want to come in and put their name down accepting this food and having people in the community looking down on them. There's a loss in that connection; we built trust in coming anonymously. Oklahoma is ranked highest in the country for adverse childhood trauma and experiences, which have a compounding effect on kids, seeing grandparents, aunts, and uncles raising these kids without the parents being there.” - **Caity King, Director of Strategic Advancement, of Noble County YMCA**
 - Families want services to feel approachable and not arduous and impersonal
- Tons of gratitude, appreciation
 - Thank you notes from kids were ecstatic. Kids enjoyed and loved receiving meals.
 - Families liked having their kids have access to meals in the summer, it was valuable for families.
 - “The stories these kids would tell. I have a girl that got a full ride to Vanderbilt. She graduated last year. She's so glad because she was raised by her grandmother. She said if it hadn't been for the meals, she would not have made it. She talked about the difference it made every day, knowing that she had that to count on. It's powerful when you talk to people. She credits school nutrition a lot for making her successful. That she didn't have to worry about going home and not having food to eat or going to bed hungry.”- **Donna Martin, Former Director of School Nutrition Program, of Burke County Public Schools**
 - “It is a real barrier for families that are caring for children with physical disabilities, children in wheelchairs, to drive twice a day, to one spot, to get both breakfast and lunch. A lot of people are living on that edge, of being able to provide their children with regular access to nutrition or not. Access to meals can have a significant impact on families’ budget. Being able to provide grab-and-go meals, allows for some families to feed their children and get to work on time, and for others, it means they actually have access to nutrition for the children they care for.”- **Jamie Breidenbach, Program Manager, of Missoula Food Bank & Community Center, Montana**

- “Oh, the feedback has been, please don't let it stop. Find a way to continue it. We are in a rural area, and [people are food insecure]. They see the importance of it and would love for [non-congregate summer meals] to continue.” - **Anonymous**
- Families feel it is worth the drive since it's more than one meal. It is 5-10 days' worth of breakfast and lunch being distributed.
- Non-Congregate programs and other child nutrition programs can allow staff and volunteers to reflect on their own lives and value of being food secure

B. Insight of Non-Congregate Service from Providers

- “When you don't make things too difficult, the goodness in people comes out, we learned the lesson to take care of the need, and it really shifted the way people in the community thought [of our organization]. - **Shea Boschee, CEO, of Noble County YMCA**
- As non-congregate providers, all sponsors/sites will experience the same or similar struggles when managing and sustaining the program.
 - “This is what I've always said, is that we need to have more time to share and ask questions. Because when you get a lot of school nutrition directors together, you can usually find the answers amongst everybody, whatever problem that you have. I mean, school nutrition directors are stressed out. There's a lot of stress with staff issues, with the fact that we can't find products, supply chain issues, and the biggest stress is staff, that we can't find staff.”- **Donna Martin, Former Director of School Nutrition Program, of Burke County Public Schools**

XIII. Racial Equity

- IMPORTANT: Do families and communities of color feel welcomed? How is the environment, atmosphere, and service inclusive? Do families and communities of color navigating food insecurity feel your organization is approachable and safe for them?
- Survey families on what foods did their kids like, what foods they didn't like, what they liked about the boxes
- Employ BIPOC (Black, Indigenous, People of Color) staff that are reflective of the community, live in the community, to help decide what the menus were going to be for the boxes and what did they feel like the kids would like culturally, what would they resonate with, what makes them feel seen with their racial/ethnic identity through food
 - On the ground, when serving meals, ask families and communities directly:
 - Tell me what you liked about the boxes
 - What was your favorite part?
 - Was there anything you didn't like?
 - Was there anything you didn't do?
 - What kind of cuisine do you like?
 - What kind of flavors are you into?
 - What are their priorities for food security?
 - Hire language translators for all outgoing menus, educational materials, promotional documents alongside non-congregate meals, including on social media
 - Knows specific communities' dietary needs and how to accommodate them
 - Allows for de-stigmatizing of cultural foods and more exploratory eating
- Alongside non-congregate meals, include activities, educational materials, and celebratory flyers about Black History Month, Juneteenth, National Hispanic Heritage Month, Asian American and Pacific Islander Heritage Month, National Native American Heritage Month
- Honor the Indigenous land you are on by creating land acknowledgements
 - <https://www.npr.org/2022/10/10/1127837659/native-land-map-ancestral-tribal-lands-worldwide>
 - <https://native-land.ca>
- Be intentional about accepting or not accepting funding that do not align with your organizational values
 - **Reflect on the structure of congregate programming:** asking BIPOC children, who may have a different native language, to sit and eat with white strangers, as a condition of being fed. Organizations have felt this congregate structure didn't align with their values and believe feeding kids this way was undignified and disrespectful.

- Have the community try new cultural foods to destigmatize cultural cuisines that are central to families' and communities' ethnic/racial identity
- How can organizations adapt their food sourcing and the way they purchase and acquire food to fit communities' needs rather than the other way around?
- Meeting communities with where they are at as different racial/ethnic communities have distinct cultural experiences with food
 - “We definitely in our strategic plan, identified the need to be culturally aware, culturally humble in the way that we approach service in our different communities. We're doing a lot of surveying, but we've attended learning labs on how to do good surveying, how to be respectful in the way that we collect data, why we collect it, and make sure that there is a purpose that benefits the person we're asking questions of, and that we have an action plan for what we'll do with that data. **We don't just ask to ask; we ask to act.** We're doing some continually active things among food acquisition, programming, having tough conversations, and letting our communities lead.”- **Jill Dixon, Deputy Director, of The Food Depot**
 - “Food banks, for so long, relied heavily on donated food, which then didn't allow us to do more culturally [appropriate] food. Those sorts of donations are drying up, and that gives our food bank the opportunity to purchase what is culturally appropriate or relevant for communities we serve and more nutritious.” - **Sherry Hooper, Executive Director, of The Food Depot**
- Is there data or other quantitative tools you can use to hone in on areas that have a higher population of BIPOC communities?
 - EX: Central Texas Food Bank with their Food Access Convening Tool (FACT), <https://www.centraltexasfoodbank.org/press/central-texas-food-bank-launches-fact-innovative-new-strategic-planning-tool-helping-end>
- Can this data or other quantitative tool tell the metrics of food insecurity in BIPOC communities and what the racial disparity is?
- Is this data or other qualitative tools especially DISAGGREGATED by race and ethnic group? Every racial and ethnic communities' propensity towards food insecurity is DIFFERENT. No two racial and ethnic communities' stories and traumatic history with food insecurity is the same.
 - You can't see how a racial or ethnic community navigates food insecurity when we're lumped in “OTHERS.”
 - How are organizations gathering data about BIPOC communities if organizations are not willing to unravel distinct racial and ethnic communities from the category of “others?”

- **Additional Learnings of Racial Equity from Racial Equity Coach and Author, Marlysa D. Gamblin (<https://www.marlysagamblin.com> / <https://www.gamblinconsults.com>):**
- **Gamblin, Marlysa. Racial Equity Scorecard. Bread for the World Institute. June 2020. [racial-equity-scorecard-policies.pdf](https://www.breadfortheworld.org/~/media/2020/06/2020-racial-equity-scorecard-policies.pdf) ([votingrecord.us](https://www.votingrecord.us))**
 - Racial Equity Principles by Marlysa D. Gamblin:
 - Principle 1: Center the needs, leadership, and power of BIPOC first throughout the process.
 - Include looking at BIPOC people as leaders, respecting the experience we bring, having us as the decision makers, and using our research and thoughts from the beginning
 - Center us because we have lived experience with food insecurity and many other systemic issues
 - Principle 2: Name and consider each community of color individually, avoiding terms such as “minority.”
 - Each community has its own historical trauma with racism and requires different resources and support to acknowledge each distinct adverse experience.
 - Principle 3: Analyze the specific outcomes for reaching racial and ethnic groups.
 - Because of principle 2, there are different “why’s” behind the varying outcomes that different racial and ethnic communities experience. Also, not all BIPOC communities have the same outcomes when it comes to racial history in the United States.
 - Principle 4: Set up policies and programs that are responsive in a way that is proportionate to the historical trauma impacts.
 - How can BIPOC communities achieve equitable and racial justice optimal outcomes, in EVERYTHING, including institutional, social, economic, political power with decision-making?
 - Principle 5: Include a robust implementation and monitoring plan.
 - How effective is the implementation of policies tailored to racial equity? What measurement or evaluation is being used to objectively see progress with racial equity implementation?
 - **DON’T EQUALIZE THE IMPACTS OF RACE WITH ANOTHER SOCIAL CONSTRUCT** (like being a woman, LGBTQIA+, age, etc.)
 - “No one can speak with true authority on anti-hunger and anti-poverty policies unless they include how race has influenced the trajectory of America, as racism is disproportionately deadlier towards the livelihood of historically marginalized communities” - John Hoang

- White Supremacy Culture by Tema Okun:
https://www.dismantlingracism.org/uploads/4/3/5/7/43579015/okun_-_white_sup_culture.pdf
- White Supremacy Culture Resources by the National Education Association:
<https://www.nea.org/resource-library/white-supremacy-culture-resources>
- Additional Books to read on Race in the United States that affect anti-poverty policies:
 - “Dying of Whiteness: How the Politics of Racial Resentment Is Killing America's Heartland” by Jonathan M. Metzl
 - <https://www.bostonreview.net/articles/jonathan-m-metzl-dying-whiteness/>
 - “The Sum Of Us: What Racism Costs Everyone And How We Can Prosper Together” by Heather McGhee
 - <https://www.npr.org/2021/02/17/968638759/sum-of-us-examines-the-hidden-cost-of-racism-for-everyone>
 - “Caste: The Origins of Our Discontents” by Isabel Wilkerson
 - <https://www.npr.org/2020/08/04/898574852/its-more-than-racism-isabel-wilkerson-explains-america-s-caste-system>
 - “How the Word is Passed” by Clint Smith
 - <https://www.npr.org/2021/06/02/1002027683/how-the-word-is-passed-teaches-the-importance-of-reckoning-with-history>
 - “How to Be an Antiracist” by Ibram X. Kendi
 - <https://www.npr.org/2019/08/15/751070344/theres-no-such-thing-as-not-racist-in-ibram-x-kendis-how-to-be-an-antiracist>
- Crash Course: Black American History by Clint Smith
 - <https://youtube.com/playlist?list=PL8dPuuaLjXtNYJO8JWpXO2JP0ezgxrJJ&si=11-vyKAmkhToAbyB>
- Applying a Racial Equity Lens to End Hunger by Bread for the World:
<https://www.bread.org/article/applying-a-racial-equity-lens-to-end-hunger/>
- Resources for Food Banks to cater their services towards Immigrant Families
 - [“Strengthening Food Security in Immigrant Communities: Strategies to Improve Access to School Meals, Summer Meals, Food Pantries and WIC.” - Hunger Free Colorado \(January 2021\)](#)
 - [Food Resources for Immigrant Communities: Nutrition Programs, Public Charge, and Beyond by Hunger Free Colorado \(June 2021\), video is 53 mins long.](#)
 - [Protecting Immigrant Families Campaign \(PIF\)](#)
 - FRAC is a partner organization with PIF

XIV. Long-Term Sustainability Planning

This section is dedicated to all contemporary and future non-congregate providers. In each interview, I had asked the question “For rural sponsors/sites that are considering moving from congregate to non-congregate, what factors/guidance/advice would you recommend they focus on as they plan the transition?” May this section grant you the wisdom, reassurance, and confidence to trailblaze your own non-congregate program in your community.

- Collaborate and ask questions unabashedly. Even questions like “can we set up a table at your pool?” Help others understand your intentions and motivations to feed food-insecure community members
- It is VITAL you have a team to go into non-congregate programming and have partnerships with other community resources, organizations, and leaders. Always REMEMBER that a NO is NOT a NO.
- Record-keeping is PARAMOUNT for getting your reimbursement back.
- There are so many advantages in taking the time to prepare multi-day meal boxes.
 - Plan in advance your menus
 - Source your food in advance
- Before you start your non-congregate journey, do a feasibility study to see if your organization can financially support a non-congregate program.
- It is important to look critically at what approach, system, and method offers the greatest impact per the effort put in.
 - Do you have the staff?
 - Do you have the financial capacity?
 - Can your organization handle non-congregate programming?
 - Is there buy-in from your organization to do this?
 - Can we use the same resources we have in a more effective way?
- Focus on finding community leaders and people who have the passion for it. They can help build buy-in for your program.
 - Is there buy-in from families and the communities you are looking to serve?
 - SEE THE WORTH OF YOUR SUMMER FEEDING PROGRAM!
 - Be CREATIVE with your summer feeding program! Make it INTERESTING! You must MAKE IT FUN FOR THE KIDS!
 - Add activities and different components to enrich your program!
 - **NO EXPLOITATION! FIND WAYS TO COMPENSATE THEM FOR THEIR LABOR!**
- Tap into the research and best practices curated from other organizations like No Kid Hungry and FRAC! There are TONS of resources online, within your state, and your community!

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- Establish a good relationship with your state agency! They are just as invested as you are in wanting to see more sponsors/sites to give greater access to kids for summer meals!
- Talk to organizations within your area or reach out to organizations out of your state that are doing non-congregate programming! Everyone is interested in achieving the same goals, you are NOT alone!
 - BUILD that network of others who share your mission, goals, and vision so then you can leverage your collective voices to make your vision happen!
- Continue thinking how you, your organization, or your summer feeding program can proactively remove barriers
- How can your local state hunger coalitions advocate against added regulations that are not needed?
- Be ENTHUSIASTIC about summer feeding programs! The biggest success is working in coordination with your team!
- Sponsors, recruit sites as early as you can for the summer!
- Know your numbers, know your data!
- Look at your surroundings, how close/far is the nearest grocery store? Personal stories work in making the case for non-congregate programming!
- Make sure you have enough warehouse space and staffing!
- GOOD LUCK!

XV. Policy Recommendations

- **Combination of Non-Congregate and Congregate Models**
 - Providers can't offer congregate meals to children who can't attend summer programs and can't offer non-congregate meals to children attending summer programs.
 - Is there any possibility of having the duality of both summer feeding programs?
 - Children can learn, experience enrichment activities, AND take multi-days' worth of meals home doing grab-and-go.
 - For urban sites that could not do non-congregate, providers felt as if they were creating barriers, being part of the problem, driving food insecurity by denying access.
 - How can we increase access to meals and nutrition for ALL children?
 - It allows for far more flexibility for communities to tailor summer meal programs for families who are food insecure.
- **Non-Congregate Permanent Program Expansion towards Urban Areas not just Rural**
 - Non-Congregate shouldn't have to be a "back-up" to Congregate Programming
 - In 2020-2022, providers and those who work closely with food insecurity policy, saw how much summer meal participation increased, especially under a time with COVID lockdown restrictions. Many low-income communities are still recovering from the past couple of years. The same inequities, impoverished injustices, and compounding factors of poverty exist and are pervasive in urban areas, not just rural areas.
 - Non-Congregate may be more accessible to urban communities like it is to rural communities. Parents are asked to either drop their child off once a day for two hours to eat a meal in which their child has to sit there and eat. Or parents come to a site once after 5-10 days (depending on how many days' worth of meals are distributed) and receive all their meals for their children, whether it be breakfast and lunch or lunch and snack with grab and go. Many parents have chosen the latter.
- **Summer Feeding Programming expansion to Americans who are 18+**
 - How can providers avoid making children feel like they were allowed to get fed but the person who loves them isn't?
 - Providers are questioning how to provide and help tackle other older demographics' issues with food insecurity.
- **Reduce the Carbon Footprint and Ecological Impact of Summer Feeding Programs**
 - Reducing the financial burden of compostable boxes, bags, bowls, etc.

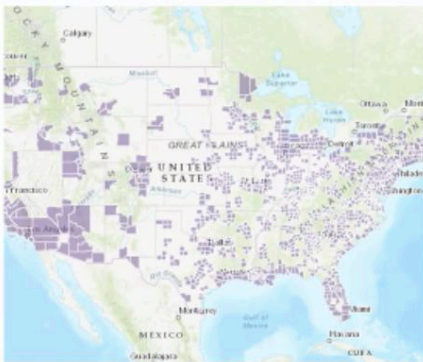
- Providers see it distressing to see their efforts to combat food insecurity also contribute to harmful waste and into landfills
 - <https://www.oceanwatch.org.au/uncategorized/compostable-vs-bio-degradable/>
- **Disaggregate Racial and Ethnic Quantitative Data on Future Summer Meal Participation and Food Insecurity Research**
 - [Krieger, Nancy. "ENOUGH: COVID-19, structural racism, police brutality, plutocracy, climate change—and time for health justice, democratic governance, and an equitable, sustainable future." *American Journal of Public Health* 110.11 \(2020\): 1620-1623.](#)
 - Krieger uses numbers and data to communicate further about housing and food insecurity, she writes, "these metrics of misery, and the inequities of misery, are severe" in saying that real people and BIPOC communities feel the daunting denial of the essential dignities of life that cause constant panic, disorder, uncertainty, psychological trauma, loss of agency, peace, and security (Krieger 2020, pg. 2, paragraph 1).
 - Krieger uses her expertise to make the case on how detrimentally structural racism, sexism, homo/transphobia, ableism, xenophobia, and victims of incarceration affect the public health of Americans using data.
 - Krieger writes "the scant data that do exist terribly expose the lethal politics that treat people of color and other low-income essential workers nevertheless as expendable, who matter solely to keep businesses open, not because their own lives matter" (Krieger 2020, pg. 2, paragraph 3).
 - Data is one of the most effective tools policymakers use to evaluate the effectiveness of a policy.
 - For example, for the issue of student debt, according to Joanna Darcus at the Lumina Foundation, "disaggregated data and research are needed to tell the story of [Asian] experiences with student debt. Without such steps, we cannot understand and properly address the challenges [Asian] students face" when it comes to bad economic policies that will intentionally and flawlessly continue to execute their oppressive nature that isn't the most visible without cultural context, nuanced understanding, and community voices.
 - <https://www.luminafoundation.org/wp-content/uploads/2021/02/borrowers-of-color-2.pdf>
 - Data is one of the most effective ways to tell the story, adverse history, and trauma of each racial and ethnic community dealing with food insecurity.

- Every racial and ethnic communities' propensity towards food insecurity is DIFFERENT. No two racial and ethnic communities' stories and traumatic history with food insecurity is the same.
 - You can't see how a racial or ethnic community navigates food insecurity when we're lumped in "OTHERS."
 - How are organizations gathering data about BIPOC communities if organizations are not willing to unravel us from the category of "others?"
- **More Flexibility for the Permanent Version of Non-Congregate**
 - From the waivers, it allowed many non-congregate providers to serve children more effectively and efficiently. For example, more flexibility with time for meal pickup/delivery.
 - For working-class families, bringing their child twice a day for breakfast and lunch in the traditional congregate feeding structure requires a lot of flexibility from their employers, which many don't have the luxury of.
 - Allow caregivers/parents to pick up on behalf of children
 - As of December 29th, 2023, the USDA with its publication of the "Interim Final Rule (IFR)," allowed for this flexibility. For more, here is the direct link, <https://www.federalregister.gov/d/2023-28488/p-280>
- **Increase Federal Reimbursement rate to increase sustainability for non-congregate providers**
 - There is a lot of non-congregate coordination to consider and to implement. From staff time spent on administrative work and record keeping to procuring food, equipment, and vehicles, a lot of non-congregate providers use the reimbursement funds to cover all those expenses, while trying to look for sustainability in return with the reimbursement funds.
 - Providers must reevaluate their programming and either cut or minimize certain aspects of non-congregate operations for future sustainability and longevity.
- **Targeted Outreach towards Food Insecure Undocumented Immigrant Children to Participate in Non-Congregate and other Summer Feeding Programs**
 - Providers are taking into consideration and thinking strategically on how to make summer feeding programs more inviting, welcoming, reassuring, and safe for undocumented families, who are uncomfortable with disclosing their status.
 - Providers are committed to feeding anyone who is food insecure. However, summer participation can drop drastically due to undocumented families' fear of deportation and especially when the United States has a nationwide hostility towards undocumented immigrants.

- **Expanding Rural Eligibility/Definition and Use RUCA Codes for USDA & State Determination of an area being qualified as Rural for Non-Congregate Eligibility**
 - Many providers are having issues proving their area as rural, to be approved to implement their non-congregate program, under the summer 2023 version of the rural designation map tool and guidelines by the USDA.
 - As of December 29th, 2023, the USDA has expanded and updated its definition and eligibility of an area being rural with its publication of the “Interim Final Rule (IFR),” because of having conversations with stakeholders. Below are USDA’s updated rural designation tool map and guidelines for rural area eligibility:

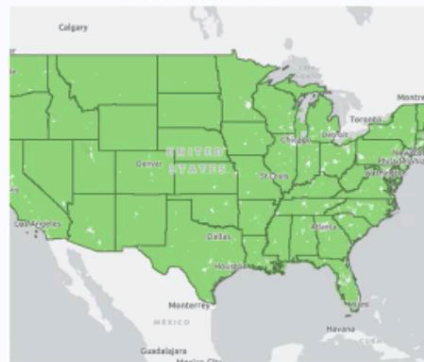
FNS Rural Designation Map

Before the IFR



Unshaded = Rural; Purple = Urban

After the IFR



Green = Rural; White = Urban

Rural Definition

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 (RUCC) and Urban Influence Codes (UIC);
- (3) Any census tract classified as a non-metropolitan area based on USDA Economic Research Service’s Rural-Urban Commuting Area codes (RUCA);

- For more information on each RUCC or RUCA, here is a direct resource from No Kid Hungry on those population metrics,
<https://bestpractices.nokidhungry.org/Summer-Meals-Eligibility-Map>

Rural Pockets

Rural means:

(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**.



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- For more updated information on rural eligibility for non-congregate programming in summer 2024, the USDA had published its “Interim Final Rule” on December 29th, 2023. Here is the link directly towards the section that talks about rural eligibility:
 - <https://www.federalregister.gov/d/2023-28488/p-180>
 - Read starting from “Therefore, after consultation with Federal partners, USDA provided further guidance allowing States to use the following classification schemes to designate rural areas and pockets in summer 2023,” to the last paragraph before the document transitions to “III. Conditional Non-Congregate Site.”

XVI. Conclusion

“We deserve more than survival. We also deserve love, and fulfillment, and peace, and community, and space to grow into the most aligned versions of ourselves. We deserve to thrive.”

- Mitchell C. Clark (@michelleclark)

“It is terribly inhumane to block pathways out of poverty and oppressive debt because you didn’t need or have those pathways”

- Bernice A. King (@BerniceKing)

“Peace is a form of Generational Wealth.”

- Dr. Monifa, M.D. (@DrMonifaMD)

Culture moves a lot faster than U.S. policy. The COVID-19 pandemic gave U.S. policy a chance to catch up to the American culture of being financially constrained. The evolution of non-congregate exemplifies humanity’s spirit of innovation and resourcefulness when the world demands it. The demand for convenience, flexibility, access, and more viable ways of receiving meals is worth reflecting upon. Since the waiver years, it has revealed the nature of proactive barriers and obstacles in food security bills and efforts prior to 2020. Yet, if a hunger free nation is the goal, the presence of advocates, operators, coalitions, and people with lived experience, is still our best transformative agents of change, for advancing the public will of food security into future policies.

Non-congregate programming is vital in showing how experimenting with new theories on feeding children can open the door for more opportunities and pathways up to higher standards of feeding and resource distribution. However, poverty is too intertwined within our culture, community, society, institutions, and us. The longer poverty, as an artificial and systemic struggle, exists through policies to have the most oppressive impact, it builds the case for stronger counterarguments of not just catering to needs, but fighting for just values, morals, and ethics where families and communities have the right to be healthy, like being able to have nutritious meals every day.

Considering the persistence of poverty and food insecurity, there is mounting pressure for more momentum of building upon non-congregate and other summer feeding programs. As a nation, what is our plan in ensuring low-income families and communities will have food beyond feeding programs?

According to Isabel Wilkerson, author of “Caste: The Origins of Our Discontents,” the longer structural and systemic issues like food insecurity and hunger exist, the harder it is for lasting change to come by, and the issue becomes increasingly challenging to remediate. Kids that observe adults struggling with poverty and food insecurity are tragically aware, from an early age, of the stress fractures that are apparent. They are observant to the issues that adults try to hide. If one wants to go deeper into the roots of inequality, inequity, and injustice of America, Wilkerson compares America, as a country, to an inherited house. Wilkerson tells her readers to imagine inheriting a house. They gave it a new roof and paint job. However, the ceiling has a crack, it’s minor for now, but the longer it is ignored, it can endanger the residents living inside. One day, specialists come and notify the owners that by looking at how much the ceiling is bent and warped, it might collapse onto the house anytime. By using this metaphor, Wilkerson illustrates that despite readers not being involved in the present condition of the house, it is their house now, meaning it is their responsibility to tend to the issues that manifest themselves. No house remains in top condition, it must be proactively maintained, and tended to with preventative care. Despite food secure and economically stable Americans not being involved in food insecurity and poverty, they remain susceptible to becoming impoverished, due to the economic conditions of the United States becoming dire. The cracks in the ceiling have gone on unrepaired for too long, feeding programs are like duct tape, holding the old house that the United States is barely together.

The United States has shown it is resistant to change the foundational economic pillars that contribute to how the compounding factors of poverty and food insecurity oppressively operate. The dehumanization casted upon low-income families and communities has emerged as a huge obstacle, due to the United States not enacting enough meaningful change, to remedy the artificial problem that is food insecurity and poverty. What is the policy plan and implementation beyond feeding programs? The root cause of food insecurity is having, as the USDA defines, “insufficient money,” an economic condition, not being underfed. How many Americans are increasingly living paycheck to paycheck? How many Americans are feeling despair and hopelessness about their economic future? How many Americans are desperately overworking themselves beyond the normal 40-hour work week to make a decent living? How many Americans feel that the American Dream is too far out of their reach in their lifetime? Financial illiteracy has never been the cause of poverty and food insecurity. The United States and with the efforts of anti-hunger organizations, coalitions, advocates, and people who have lived experience, must shift their energy, priorities, and resources to amend and resolve the economic conditions that put increased Americans everyday into the vulnerable and fearful position of having “insufficient money” to independently buy enough food. By improving nutrition programs and increasing access to resources, the United States is addressing the surface level of food insecurity. At the same time, the United States needs to critically address root economic nuances and complexities that contribute to food insecurity.

XVII. 2024 USDA Webinar Summer Meals Rule Update Important Slides

The 2024 version of non-congregate programming, according to USDA FNS in their live webinar, on January 11th, 2024, found here:

<https://www.fns.usda.gov/sfsp/webinar-sponsors-and-program-operators-ifr-non-congregate-summer-meal-service>

Revised Definition of Site	
<p>Old Definition of Site:</p> <p><i>Site</i> means a physical location at which a sponsor provides a food service for children and at which children consume meals in a supervised setting.</p>	<p>Revised Definition of Site:</p> <p><i>Site</i> means the place where a child receives a Program meal. A site may be the indoor or outdoor location where congregate meals are served, a stop on a delivery route of a mobile congregate meal service, or the distribution location or route for a non-congregate meal service. However, a child's residence is not considered a non-congregate site.</p>

<p>New Site</p>	<ul style="list-style-type: none">• New site means a site which did not participate in the Program in the prior year, an experienced site that is proposing to operate a non-congregate meal service for the first time, or, as determined by the State agency, a site which has experienced significant staff turnover from the prior year.• Sites switching from congregate meal service to non-congregate in summer 2024, are considered new sites• Sites switching from congregate meal service to operating a hybrid site (operating congregate and non-congregate meal service at the same site) are considered new sites.
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Site Supervisor and Operating Costs

Site Supervisor:

Site supervisor means the individual who has been trained by the sponsor and is responsible for all administrative and management activities at the site...**Except for non-congregate meal service sites using delivery services, the individual on site for the duration of the food service.**

Operating Costs:

Operating costs means the cost of operating a food service under the Program, including the...

- **Costs of delivering non-congregate meals in rural areas.**

Congregate Meal Service vs. Non-Congregate Meal Service

Congregate Meal Service:

Congregate meal service means a food service at which meals that are provided to children are **consumed on site** in a supervised setting.

Non-congregate Meal Service:

Non-congregate meal service means a food service at which meals are provided for children to **consume all of the components off site**. Non-congregate meal service must only be operated at sites designated as “**rural**” with **no congregate meal service**.

Determining No Congregate Meal Service

- **No specific definition** for *no congregate meal service*.
- State agencies have the **discretion** to determine whether an area has no congregate meal service.
- State agencies should **consider factors** including, but not limited to:
 - Any **physical conditions** or other barriers;
 - **Limited capacity** of a congregate site;
 - Sites serving the same children on **different days, different weeks**, or for **different meals** on the same day; and
 - Sites appealing to **specific groups**.

Conditional Non-Congregate Site

Conditional non-congregate site means a site that qualifies for Program participation because:

- it conducts a non-congregate meal service for eligible children,
- in an area that does not meet the definition of “areas in which poor economic conditions exist,”
AND
- is not a camp, as defined in the same section.



Meal Service Flexibility Restrictions

- State agencies **may no longer** create statewide bans on the following flexibilities:
 - Multi-day meal issuance;
 - Parent/guardian pick-up; or
 - Bulk food items.
- State agencies retain discretion to restrict the availability of these service options on a **case-by-case basis**.

SSO Non-Congregate Meal Service

New regulations in 7 CFR 210 and 220:

SFAs operating the SSO in a rural area may be approved to offer a non-congregate meal service consistent with that established in part 225.

Such SFAs must comply with the non-congregate meal service requirements and non-congregate meal service options contained in part 225



Application Requirements

Previous Regulations

Did not include non-congregate meal service requirements.

New Regulations

- Include documented procedures when requesting to non-congregate meal service flexibilities
- Site applications must whether the site is congregate or non-congregate and rural or non-rural
- For conditional non-congregate sites, include number of enrolled children who meet eligibility standards

7 CFR 225.6(c)(2) & (3)
 7 CFR 225.6(g)(1) & (2)

Approval of Sites

Previous Regulations

- Required proposed sites to be located in an “area in which poor economic conditions exist,” or will serve specific groups of eligible children
- Specific to congregate meal service regarding site caps; for vended sites, the initial maximum approved level must be based on the historical record of **attendance** at a site

7 CFR 225.6(h)(1) and (2)

New Regulations

- Sponsor applications cannot be denied based solely on the intent to provide non-congregate meal service
- Amended to include conditional non-congregate sites
- Requires vended sites must have an approved level for the maximum **number of meals** that can be served (to include non-congregate)

7 CFR 225.6(b) and (h)

State Agency Discretion

Summer 2023

- Allowed State agencies to establish statewide policies regarding non-congregate meal service flexibilities
- Allowed statewide ban of non-congregate meal service
- State agencies who allowed non-congregate meal service operations could not deny a sponsor’s application based solely on the intent to provide non-congregate meal service

New Regulations

- New **7 CFR 225.6(b)(12)** provides that a sponsor’s application may not be denied based solely on the intent to provide non-congregate meal service
- State agencies have the discretion on a **case-by-case basis** to prohibit sponsors from using certain flexibilities of non-congregate meal service, regardless of sponsor type



Clarifications to Existing Requirements: State-Sponsor Agreement

Regulation	Clarification
<ul style="list-style-type: none">Sponsors approved for Program participation must enter into a written agreement with the State agency.	<ul style="list-style-type: none">Sponsors of sites operating as conditional non-congregate sites are exempt from serving meals without cost to all children and may charge for meals served to children who do not meet the Program's income standards.These sponsors may claim reimbursement only for meals served to children who meet the Program's income standards.Sponsors must maintain children on site while meals are consumed only applies for sponsors providing a congregate meal service.Sponsors of sites operating as conditional non-congregate sites are exempt from certain meal service time requirements.

Summer Meals Site Finder

- Only nationwide public resource with detailed meal site information
- Summer Food Site Locator Form (FNS-905)
 - Provides details such as times, days, and types of meals served
 - Prior to rulemaking was optional
 - Data populates USA National Hunger Clearinghouse and other partner resources

Will be required for all State agencies for Summer 2025

Coordinated Services Plan (CSP)

- **Beginning in 2025**, States will be required to submit to FNS a single Coordinated Services Plan (CSP)
 - Describes the State's **coordinated approach** to reaching children
- Summer Nutrition administering State agencies must **work together** to develop and implement the plan.
 - ITOs may create their own CSP
 - Encouraged to coordinate across other governmental agencies and NGOs
- Must update at least **every 3 years**
 - Significant changes to the plan must be updated annually
- States must also **notify the public** of their CSP and make it readily available on their website.

Identification and Determination of Eligible Children

Sponsors must:

- Obtain **written parental consent** prior to providing home delivered meals;
- Enter into a **written agreement or MOU** with the **State agency or local SFA** to receive student data.



Can use household identification including students who are homeschooled or families with children not in schools yet. Do not have to enter in MOU with OSDE or school districts if they use their own form.



Conditional Non-Congregate Sites

Sponsors of these sites must **notify** participants of the availability of **free meals** and if a **free meal application is needed**.

Sponsors of these sites are required to **provide reasonable modifications** to accommodate **participants with disabilities**.

SNAP is automatically eligible. If using your own form certain statements must be on the form like the SNAP eligible statement.

Seeking comments on the provision of other people picking up meals in place of parents/guardians. Like older siblings, others in the home, etc.

Entire route for home delivery models will need to be added as the site. Each drop off must be monitored and must ride along or follow driver to ensure delivery.

Expenses for mileage, staff, driver, etc. can be part of the reimbursement cost. No additional funds can be added but can be covered in the current reimbursement.

Proxies are not permitted as of now for food pickup looking for comments on that. However, if a child is with driver/proxy they can get the meal at pickup.

NON cong can operate in close proximity if its by a congregate closed enrolled site or camp site. Non cong must ensure they are not serving same population.

Rural pockets are determined and good for 5 years. Can be established more frequently to establish more service areas.

XVIII. FRAC's Taking a Fresh Look at Summer Meals Webinar [2-01-2024]

FRAC's Webinar on summer meals in preparation for summer 2024!

What Happens During the Summer Months?

- Students who rely on free or reduced-price school breakfast and lunch during the school year lose access to those meals during the summer
- Rates of food insecurity and food insufficiency among children higher in the summer
- Children are more vulnerable to accelerated weight gain, increases in body mass index (BMI), and obesity during the summer months
- While some summer learning loss is common, research shows that it disproportionately impacts low-income students and students in later grades

Learn more:

Summer Nutrition and Enrichment Programs: Effective Tools to Support Child Food Security, Health, and Learning During the Summertime

During the summer, for too many children and adolescents, increased food insecurity, weight gain, and learning loss are concerns that have the ability to persist during summer breaks and beyond. As a strategy to address these issues, to connect more children—especially non-income eligible—to high-quality summer meal and enrichment programs, which support student food security, health, and learning. This brief highlights key programmatic issues such as summertime food insecurity, weight gain, and learning loss, and then discusses the value and effectiveness of the best Summer Nutrition Programs and summer enrichment programming.

Food Insecurity and Weight Increase in the Summer

Rates of food insecurity and food insufficiency among children are higher in the summer—22.5% more children do not have access to the school nutrition programs available during the academic year.¹ Students who receive a free or reduced-price school lunch during the school year are especially at risk in the summer months when these children are more likely to experience increases in food insecurity and food insufficiency in summer months when compared to their regular non-summerizing periods.² An unmet need for food is more likely to be associated with health consequences for health and learning and learning in the child's learning years, including lower health status,³ poor dietary quality,⁴ behavioral and motivational problems,⁵ mental health problems (e.g., depression, anxiety,⁶) and poor educational performance and academic outcomes.⁷

Summer Nutrition Programs



The Summer Nutrition Programs provide nutrition meals, non-meal educational enrichment and activities that support the children's learning and health during the summer months. Schools, local government agencies, and private nonprofit organizations can support the Summer Nutrition Programs by raising federal funding to provide meals of able to increase opportunities for their own primary low-income children. Sites on the school, recreation centers, parks, YMCA, Boys & Girls Clubs, and other locations where children congregate during the summer months. Contact us at info@frac.org.

¹ <https://www.frac.org/research/summer-nutrition-programs>.
² <https://www.frac.org/research/summer-nutrition-programs>.
³ <https://www.frac.org/research/summer-nutrition-programs>.
⁴ <https://www.frac.org/research/summer-nutrition-programs>.
⁵ <https://www.frac.org/research/summer-nutrition-programs>.
⁶ <https://www.frac.org/research/summer-nutrition-programs>.
⁷ <https://www.frac.org/research/summer-nutrition-programs>.

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Today's Agenda

- Summer Nutrition Programs Overview**
Clarissa Hayes, FRAC
- Operator Perspective**
 - Maribel Tandazo, Senior Director of Community Impact - *Greater Valley YMCA*
 - Valerie Burciaga, Nutrition Grant Manager - *Boys & Girls Clubs in Texas*
 - Beth Brewster, Supervisor of Food Services - *Caroline County School District (MD)*

Why Are the Summer Nutrition Programs Important?



Combats hunger and food insecurity by providing free meals to children 18 and under at sites in low-income communities during summer break



Supports overall operations for schools, meal sponsors, and summer programs by providing **reimbursement** for meals and snacks



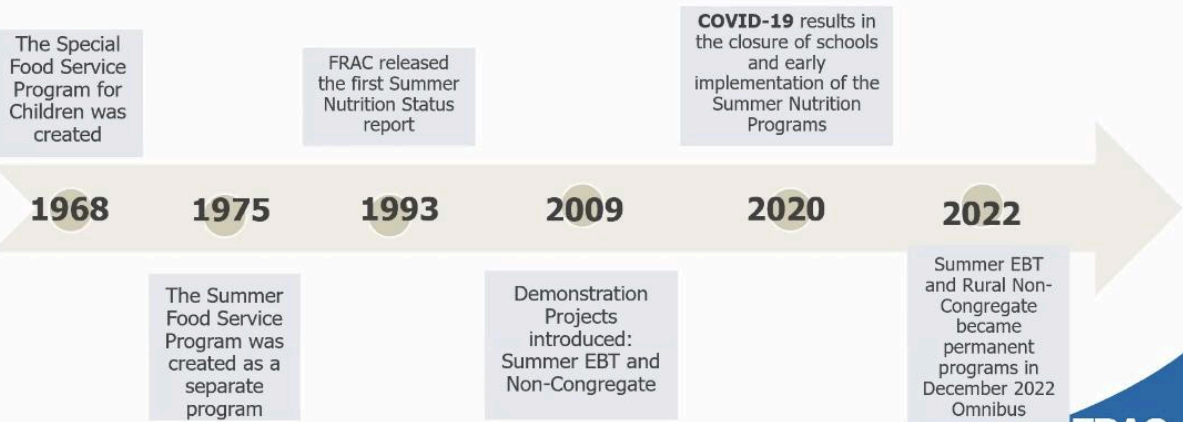
Program is **flexible** - including timing, meal options, locations, partners



Many summer meal sites provide enrichment or activities, ensuring children are engaged and socializing during the summer months



A Look Back at Summer Nutrition



Summer 2023: Key Findings

- Almost **3 million children** received a lunch on an average day in July 2022.
- **11 children** received a summer lunch in July 2022 for every 100 who received a lunch during the 2021–2022 school year.
- Participation in summer lunch in July 2022 was slightly higher than pre-pandemic levels: **201,459 additional children** received a summer lunch compared to July 2019.



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Summer Nutrition Programs: Key Facts

- **Two Program Options:** Summer Food Service Program (SFSP) and Seamless Summer Option (SSO)
- **Meal Options:** Sites can serve breakfast, lunch, or snack in certain combinations (up to 2 meals per day in most cases)
- **Eligibility:** Area eligibility or Income Eligible
 - Generally: sites are located in the attendance area of a school where 50% of children are eligible for free or reduced-price school meals through school or census data
- Must follow USDA **Meal Pattern**



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Key Differences: SFSP and SSO

Seamless Summer Option (SSO)

- **Sponsors:** School Food Authorities (extension of National School Lunch Program)
- **Reimbursement:** Meals served are reimbursed at the NSLP/SBP 'free rates'
- **Meal Pattern:** NSLP/SBP rules and meal patterns apply

Summer Food Service Program (SFSP)

- **Sponsors:** School Food Authorities (SFAs) and nonprofit organizations
- **Reimbursement:** Higher per-meal reimbursement
- **Meal Pattern:** Simplified meal pattern



Sponsor Responsibilities

- attend your state agency's training
- locate eligible sites
- hire, train, and supervise staff
- arrange for meals to be prepared or delivered
- monitor your sites
- prepare claims for reimbursement



Meal Pattern (SFSP)

Breakfast

1 Milk
 1 Fruit/Vegetable
 1 Grains/Bread



All Three Components

Lunch/Supper

1 Milk
 2 Fruits/Vegetables
 1 Grains/Bread
 1 Meat/Meat Alternate



All Four Components

Snack

1 Milk
 1 Fruit/Vegetable
 1 Grains/Bread
 1 Meat/Meat Alternate



Two of Four Components

* Schools operating SSO must use the NSLP/SBP meal pattern. Schools operating SFSP may use either the SFSP or NSLP/SBP meal patterns.



Reimbursement (SFSP)



Meal Type	Rural/Self-Prep	All Other Sites
Breakfast	2.98	2.92
Lunch/Supper	5.21	5.13
Snack	1.23	1.20

* Sponsors operating in Alaska, Hawaii, and the Territories receive a higher reimbursement

Serving Summer Meals Adds Up! Providing a Breakfast and Lunch Means:

300 children for 40 days: \$96,600
 100 children for 40 days: \$32,200
 50 children for 40 days: \$16,100



Non-Congregate in Rural Areas

Key Facts:

- **Purpose:** To fill gaps in rural areas do not have access to traditional congregate summer meal sites
- **Priority Areas:** State agencies will identify and target areas that currently do not have access to programs as part of their annual program planning
- **Eligibility:** Sites must be located in a rural area, as defined by USDA; area eligibility or conditional eligibility
- **Meal Options:** Bulk, multi-day, home delivery

Background:

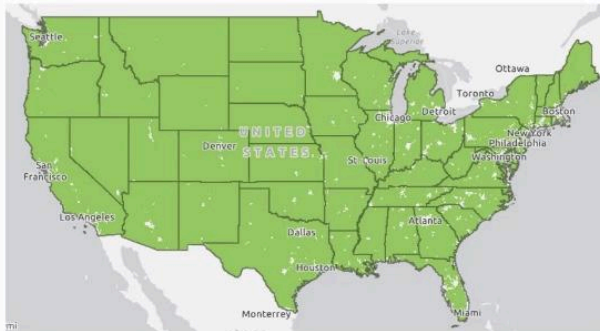
- Beginning in summer 2023, certain rural areas could distribute meals to kids outside of the typically required congregate settings through SFSP and SSO.
- USDA released an interim final rule in December 2023 that codifies much of the guidance previously released.



Connect with your state agency to determine which options will be available in Summer 2024 in your state.

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Rural Designation Map: USDA



<https://www.fns.usda.gov/sfsp/rural-designation>

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Programmatic Opportunities



Engage governors and elected officials



Retain, recruit, and support sponsors and sites



Consider changes to menus or meal offerings (e.g.



Convene partners to identify underserved areas and set goals for expansion



Policy Opportunities



Streamline summer and afterschool meals



Lower the area eligibility threshold



Allow summer sites to serve three meals per day



Provide funding to address transportation challenges





TAKING A LOOK AT SUMMER MEALS

Maribel Tandazo

Senior Director of Community Impact | Greater Valley YMCA
Food Program Service Delivery Partner | YMCA of the USA

Phone: 610-438-6065 ext 114 | mtandazo@gv-ymca.org

BETTER TOGETHER

SUMMER MEALS BEST PRACTICES

- Build Capacity for Summer Meals
- Sustainability - Become a Sponsor of the Summer Food Service Program
- Cross-Sector Partnerships



BETTER TOGETHER

SUMMER MEALS BEST PRACTICES

- Fundraise and "Friend"raise through Storytelling
- Track impact
- ASK QUESTIONS!



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**BOYS & GIRLS CLUBS
IN TEXAS**

Summer Food Service Program

Valerie Burciaga
Nutrition Grant Manager

Boys & Girls Clubs in Texas/Texas Alliance
Boys & Girls Clubs of America Government Relations

Boys & Girls Clubs in Texas

- Mission is to enable all young people, especially those who need us most, to reach their full potential as productive, caring, responsible citizens.
- 501c3 Non-profit of the Texas Alliance to provide a food program and fill the gaps to ensure youth with limited to no access to meals the opportunity for healthy & fresh meals.
- State Approved Sponsor for affiliated and non-affiliated non-profits
 - Child and Adult Care Food Program (CACFP)
 - Summer Food Service Program (SFSP)
- In addition, we advocate for youth development & nutrition programs as well as policy changes.



Where we serve...

BGCTX Food Program Today:

CACFP At Risk	SFSP
30 total	29 total
8 Rural	11 Rural
22 Urban	18 Urban



- **1 in 4 youth in Texas have food insecurity.**
- **We fill the gap for organizations that need a food program sponsor.**

SFSP Challenges and Opportunities

- Staffing/employment shortages
- Multi-lingual information & training for staff
- Operating extended hours with limited meal service
 - Advocating for allowing for a serving a third meal
- Reducing area eligibility guidelines
- Federal/State funding for transportation grants
- Offering meals/snacks that youth will eat
- Rural non-congregate – if allowed in our state?



SFSP Best Practices

- Offering a dependable & consistent program for site renewals and recruiting new sites
- Partner with a food production vendor, offering unitized meals, assist with recruiting, etc.
 - PepsiCo Food for Good
 - Warehouses in Austin, Houston, and DFW
- Streamlined the staff responsibilities & paperwork at the site
- Continuously seek out supplemental funding through grants
 - No Kid Hungry Foundation
 - Food Research & Action Center





Our Mission

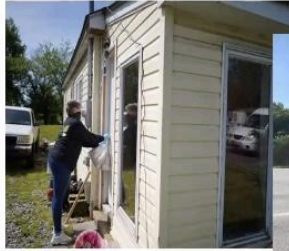


To create **healthy, economically stable families** through

- ✓ **food equity**
- ✓ **job training**
- ✓ **youth prevention**
- ✓ **economic development**
- ✓ **education**

INFORMATION

1. District wide
 - a. Community Eligibility Provision
 - b. 9 schools
 - c. 5700 students
 - d. Families in poverty 10%
 - e. Rural-whole county eligible for non congregate
2. Summer Meal Delivery
 - a. Open sites/camps all elementaries, library, churches, rec & park
 - b. Closed congregate Girl Scout Camp
 - c. Door to door (applications)
 - d. Mobile



INFORMATION (cont.)

3. Meals
 - a. Hot, shelf stable, cold, frozen meals
 - b. Breakfast & Lunch Service
 - c. Number of meals varied 1-3 days
4. Served 7 weeks of meal service
5. 36,000 meals served + 11,178 mobile bus



Summer Central Back Pack Program

375 back packs served a week



Why a Mobile Market?

- Promotion of local farmers
- SNAP (pending)
- Senior Citizen Farm vouchers
- Local economic development
- Connect with your community
- Food equity and security
- Farm scripts/ Employee Wellness Incentives





Summer Meals Resources

FRAC.org:

- Summer Nutrition Reports
- Afterschool & Summer Newsletter
- Guides/Toolkits:
 - A Governor's Guide to Summer Meals
 - FRAC Facts: Summer Meals
 - A How-To Guide for Summer Food Sponsors on Purchasing High-Quality Summer Meals
 - And more!

Contact your state agency to learn more:

<https://www.fns.usda.gov/contacts?f%5B0%5D=program%3A9088>

XIX. Appendix

The 2023 version of non-congregate programming required, according to USDA FNS in their live webinar, on March 7th, 2023, found here:

<https://www.fns.usda.gov/sfsp/summer-2023-noncongregate-rural-areas-state-agency-webinar>

- Non-congregate meal service can only be used in locations that are **considered rural, only in the summer, and without access to a congregate site**, according to the USDA FNS, “state agencies and sponsors sometimes face challenges maintaining congregate meal sites in rural areas where children have to travel long distances or widely dispersed, and it's virtually impossible for congregate meal service to happen.”
 - “For the purpose of summer 2023, the definition of rural is [any area in a country which is not part of a Metropolitan Statistical Area OR any 'pocket' within a Metropolitan Statistical Area that is geographically isolated from urban areas]”
 - The USDA FNS also provided their own “Rural Designation Map”:
<http://www.fns.usda.gov/rural-designation>
 - Metropolitan Statistical Area(s) are in purple, Rural are non-shaded, or not purple
 - "Area may still be eligible for [non-congregate meal service] if it is identified by the state agency to be located in a rural pocket within a larger area designated as urban,”
 - "The state agency must SEEK CONCURRENCE from FNS,"
 - "The act allows meals to be claimed for any child either located in an area in which poor economic conditions exist OR meets individual eligibility requirements. This means that if the rural area is area eligible, then meals for all children may be claimed for reimbursement. If the rural site is NOT in an area eligible location, only the meals served to children who qualify for free-or-reduced price meals may be claimed,"
- Sponsor Eligibility
 - "Any service institution that meets the definition of "sponsor" in program regulations is eligible to apply to operate non-congregate meals through their SFSP state agency"
 - Public/Private Non-profit School Food Authority (SFA)
 - Units of local, municipal, county of state governments
 - Tribal governments
 - Private, Nonprofit Organizations
- State Agencies MUST approve for sponsors to operate non-congregate meal service
- Home Delivery:

- Delivery can be completed by mail or delivery service, or it could be even hand delivered by program operators, staff, or volunteers
- Delivery MUST be from a Public/Private Non-Profit School Food Authority (SFA) or have a memorandum of understanding to use their student data
- Identify and invite eligible households to participate
- Obtain written consent from eligible child's parent/guardian to receive delivered meals, can be through email or other electronic means
- Confirm the eligible household's contact information, delivery address, and number of eligible children to ensure correct number of meals, even if they're not home by consent
- Meal Pick up:
 - Provide packaged meals that are taken home for children to eat later
 - Examples are grab and go, curbside service, and take-home backpacks
 - Emphasis on FOOD SAFETY requirements
 - ONLY parental notifications is required for the pick-up model, sending the child home with a flier
- Meal Service Requirements:
 - MUST meet SFSP meal pattern requirements
 - 2 meals OR 1 meal and 1 snack per child per day
 - Can provide Bulk food items, larger sized containers like gallons of milk or boxes of cereal
 - Meal service times must be established for each site and approved by the state agency
 - Provide meal modifications for participants with developmental disabilities
- "Non-congregate meal service is NOT intended to replace congregate meal service"
 - "We understand the benefits of Congregate meal service and the often-accompanying activities that are provided to the children. Thus, we do encourage sponsors to continue providing congregate meal service when it's feasible"
 - "too many children face in rural communities face structural barriers to congregate summer meals"

Hoang D. John
Congressional Hunger Center - Bill Emerson National Hunger Fellow
Hunger Free Oklahoma
Project Supervisor: Devin Schroeder

Food Inequity Study in Oklahoma with Rep. Jeff Boatman with Regional Food Bank and Food Bank of Eastern Oklahoma on rural food equity

- If you type in “Food Inequity” on the “Study” column search bar, and then click “23-075,” you should be able to see all the presentations as PDF that were presented during the interim study! [Interim Studies - Oklahoma House of Representatives \(okhouse.gov\)](#)
 - [Boatman Hosts Study on Food Insecurity \(okhouse.gov\)](#)
 - Livestream of Rep. Jeff Boatman's Interim Study on Food Inequity in Oklahoma: [Oklahoma House of Representatives \(sliq.net\)](#) (starts at 10:12:32 AM)