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Rural Non-Congregate Summer Meals in 2023: Insights from the First Year of a New Program

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Background

The U.S. Department of Agriculture's [Summer Food Service Program](#) (SFSP)ⁱ and [National School Lunch Program Seamless Summer Option](#) (SSO)ⁱⁱ are federal summer nutrition programs that offer free summer meals to kids and teens at eligible locations when school is not in session. Traditionally, both SFSP and SSO required what is known as "congregate" meal service, a model where children travel to a location to consume a meal onsite. Sometimes this is paired with activities such as summer school, camp, or other activities. However, most children do not participate in summer school or camp over summer break. With school buses not running over the summer and parents working, many children do not have the ability to access traditional congregate meal sites. These challenges are amplified in rural areas where community resources and children are spread over further distances with limited transportation options. As a result, these summer meal programs generally never reached more than 1 in 7 kids eligible for free or reduced price meals during the school year.

In 2010, Congress approved pilots to test additional nutrition interventions to help close the summer meal gap, including non-congregate meal service and Summer EBT. Both models were proven to reach populations that didn't access congregate meals, as well as improved children's consumption of healthy foods. Then, during the COVID-19 pandemic, Congress granted USDA waiver authority, which allowed for non-congregate meal service across the country, providing a larger scale test of the approach. Non-congregate meal service was successful in reaching kids of all ages and different community structures.

With these flexibilities set to disappear for summer 2023, Congress took historic action in December 2022 to authorize a permanent non-congregate summer meal service option. However, unlike the broad availability of non-congregate meal service during the pandemic, Congress only authorized non-congregate service in rural areas without congregate service. Congress allowed USDA to implement non-congregate service in summer 2023 using guidance previously developed for non-congregate demonstration projects, and directed USDA to issue an Interim Final Rule on non-congregate service by the end of 2023.

In rural communities, [non-congregate meal programs](#)ⁱⁱⁱ like grab-and-go and direct home delivery can operate where congregate meals are not available in order to reach even more children during the summer months. In addition to summer meal programs, the [Summer Electronic Benefit Program](#) (Summer EBT, or SEBT),^{iv} starting in summer 2024, will provide grocery benefits to families of children eligible for free or reduced-price school meals.

Objective. The purpose of this report is to document the implementation and lessons learned from this historic first year of the non-congregate summer meals option in rural areas in summer 2023. Through a combination of documented conversations and surveys with state agencies and sponsors, as well as Share Our Strength's No Kid Hungry (NKH) staff who work directly with states, we have pieced together a

comprehensive picture of what summer 2023 implementation of non-congregate meals looked like in terms of challenges, successes, and opportunities to expand and improve the program in summer 2024 and beyond.

Methods

No Kid Hungry's 2023 summer non-congregate meal service implementation research included simultaneous formal, informal, qualitative, and quantitative data collections to gather insights from multiple stakeholders. Multiple modes of data were collected and multiple stakeholder respondents were included. All data collection occurred between June and December of 2023. Most data is self-reported unless otherwise noted. Summaries and insights reported here reflect the experiences of the individuals and organizations participating in discussions, surveys, and observations. The data are self-reported by these individuals and agencies. At the time this report was written, official data reflecting the number of summer meals served in 2023 was not available yet – such data was made available in early 2024. Estimates and perspectives contained in this report reflect what people and sites have shared directly with NKH and not official Federal reporting of summer meal service.

State Agency Debrief. No Kid Hungry organized a State Agency Debrief on October 16, 2023. About 46 state agency staff attended the debrief, with about 26 state agencies represented. A recruitment email was sent to a list of state agency staff to invite to the debrief.

Individual State Discussions. Individual, unstructured state discussions were completed in Fall 2023 following summer meal service implementation and included state agency staff, NKH staff, and a number of sponsors. A small number of state agency discussions included perspectives from sponsors directly or through their own data collection methods. NKH staff participated and took summary field notes for 11 state discussions. Two states also administered surveys to approved sponsors within their states and shared summaries of survey findings with NKH.

State Agency Survey. NKH staff administered an online, cross-sectional survey to state agencies across the country that administer summer meals programs. The survey instrument contained a series of survey items that elicited closed- and open-ended responses across domains of summer meals program implementation, including administration, the processes for approving summer meals sponsors of non-congregate meal service, number of sponsors approved and operating, methods for tracking and reporting sponsor activities, use of definitions of “access to congregate meal site” and “rural pocket,” program integrity, successes and challenges, and recommendations for future implementations of summer meals. A total of 38 states responded to the survey.^v Not all state agencies responded to every survey item; thus, some proportions from the state agency survey are calculated as a frequency divided by the number of state agencies responding to a particular survey item, multiplied by 100. The survey instrument was administered as a Google Form.

NKH Summer Grantee Analysis. Across the United States, SOS-NKH awarded a total of \$2.2 million to support non-congregate summer meals service, with an average grant size of \$20,000. Grantees included sponsor organizations that administer summer meals programs. Forty percent of grantees served non-congregate meals exclusively, while the rest served a combination of congregate and non-congregate meals. Data on NKH summer grantees' applications (pre-award) and final reports (post-award) were summarized. A subset of grantees (104) submitted quarterly reports, used for this analysis. Quantitative information was summarized as frequencies and percents. NKH staff summarized qualitative data by first reading through responses, creating codes, and using developed codes to create themes. NKH summer grantees that submitted reporting included: 73 schools/districts, 29 non-profit organizations, one state agency/government entity, and one university. Grants were awarded to organizations in 20 states, including: Alabama, Arkansas, California, Florida, Georgia, Kentucky, Louisiana, Maryland, Michigan, Missouri, Montana, North Carolina, New Mexico, New York, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, and Virginia.^{vi}

Understanding the Caregiver Experience Report. NKH Innovation team staff led an effort to dive deeper into how and why caregivers utilized non-congregate meal service offerings in Summer 2023. Site visits and individual caregiver interviews were conducted in three rural community sites: Humboldt Unified School District, Troup County School System, and Morongo Unified School District.

Site visits to rural communities in Georgia, Arizona, and California were used to observe how meal service was implemented, best practices, and participant experiences. Site visits focused on three food distribution models for non-congregate: home delivery of 10 meals, mobile meals hosted at multiple locations with 10 meals, and grab-and-go meals at multiple locations with single meals or meals for one day. Over a two-week period, 30 caregivers were interviewed about their experiences with the 2023 non-congregate summer meal service. The participants responded to questions related to accessibility, satisfaction with the food provided, communication about the service, distribution of meals, and recommendations for service enhancement.

Survey of Rural Families. NKH Research, Data, & Policy team partnered with FM3 Research to conduct a survey among rural families regarding access to summer meals in July and August of 2023. A dual-mode survey method was selected that used an address-based sampling approach and an opt-in online panel (provided by Research America) to survey a representative sample of 600 rural families with children likely eligible for federal nutrition assistance. The survey was available via phone and online, and respondents were contacted by phone call, email, and text message. For further details on survey methods and findings please visit: <https://bestpractices.nokidhungry.org/resource/2023-summer-meals-survey-rural-families>.

Data Summarizing and Synthesis. Qualitative data including notes, transcripts, and information from debriefs, discussions, and interviews were first summarized by NKH

staff. Codes were developed and applied to open-ended responses in NKH summer grantee reporting and to summarize qualitative survey data. Univariate statistics were used to summarize quantitative data from NKH summer grantee reporting and survey responses. Broad categories from across all data collections summarized are used in this report to arrange cross-cutting insights. A series of recommendations for future non-congregate meal service implementation for the U.S. Department of Agriculture (USDA), state agencies administering summer meals programs, and the sponsors approved to implement summer meals service follows.

Findings

Overview

Based on our research, there are several key and important findings that cross themes and summarize the experiences of state agencies in summer 2023:

- Overall state agencies felt like the program was a success—new kids were reached, especially in hard-to-reach places.
- It was challenging for states to stand up a new program in a short time frame.
- Summer 2023 was viewed as more of a pilot year, and there are many opportunities for states to expand their rural, noncongregate meal programs in 2024.
- State agencies still need additional support going into 2024 to develop administrative best practices, especially with the new guidance in the IFR.

There were also similar summary findings reflecting sponsors experiences:

- Sponsors were happy to finally be able to meaningfully reach children in rural areas. A benefit of non-congregate service included more children getting meals.
- Challenges with non-congregate include late rollout of guidance; slow approval processes; limited definitions of qualifying areas; limited flexibilities allowed in the state (e.g., unable to do multiple days' worth of meals); program integrity concerns; unpredictability in participation; and logistical and resource limitations.
- Opportunities exist to boost outreach and marketing, support communications and messaging, and provide non-congregate meals in a manner that is welcoming and responsive to family circumstances.

Program Reach: Sponsors, Sites, and Meals Served

Based on our survey and conversations with state agencies, most states implemented non-congregate meals to children in summer 2023. The community of state agencies and sponsors were happy to finally be able to meaningfully reach children in rural areas. Most sponsors found non-congregate meals to be more financially viable than operating traditional congregate meals.^{vii}

Among 38 states that responded to our survey, 34 indicated that they had approved plans for operating non-congregate meal service in rural areas for summer 2023.^{viii} The number of non-congregate meal sponsors varied greatly across states, ranging from 1 to 79 sponsors. Half of surveyed state agencies reported 16 or fewer sponsors – many states opted to approve a smaller number of sponsors for this first official year of implementation of non-congregate meal service in rural areas. Those that wished more sponsors participated cited two specific barriers to expansion of participating sponsor

numbers: (1) a limited definition of “rural”^{ix} and (2) an inability to operate congregate and non-congregate concurrently.^x

Thirty-one state agencies responding to the survey reported hosting a total of 2,988 meal distribution sites, with three quarters reporting 89 sites or fewer in their state. Roughly 22% of reported total meals served during summer 2023 were non-congregate meals, according to state agency respondents reporting data (e.g., 24 state agencies). To track number and type of meals served, state agencies often assigned a designation to non-congregate sites to track meals served through claims data, asked sponsors to complete surveys, or had sites and/or sponsors contribute to a shared spreadsheet. Some state agencies reported no issues in tracking non-congregate meals while others noted that the time and resources required to pull and work with data was a challenge. Nine state agency respondents also used measures outside of the number of meals distributed to gauge non-congregate participation, often obtaining average daily participation (ADP) automatically from software used for program monitoring or from sponsor reports.

Definitions of Rural and Areas with No Congregate Service

The Consolidated Appropriations Act only allows for non-congregate meal service in “a rural area with no congregate service” but left it up to USDA to define this. For summer 2023, guidance from USDA^{xi} on February 28, 2023 elaborated that the definition of “rural” remains the same as it was defined in U.S. code: “(a) any area in a county which is not a part of a Metropolitan Statistical Area or (b) any “pocket” within a Metropolitan Statistical Area which, at the option of the State agency and with FNSRO [FNS Regional Office] concurrence, is determined to be geographically isolated from urban areas.”^{xii} “Pockets” did not have to be included on the [FNS Rural Designation Map](#) in order to be rural – a State agency could choose to indicate a site as rural in consultation with the appropriate FNSRO and seek FNSRO concurrence without submitting additional data for review.^{xiii}

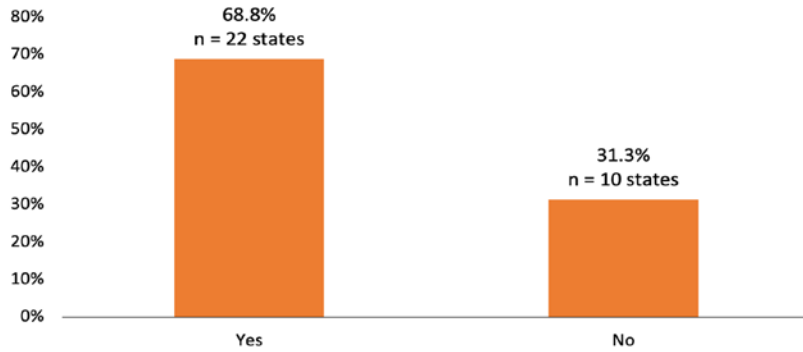
State agencies had to further decide whether an area had “no congregate service” in order to determine if non-congregate meal service was allowable in that area.^{xiv} Although guidance echoed U.S. code, saying, “[s]ponsors can provide non-congregate summer meals in rural areas that do not have congregate meal service,” the guidance also emphasized state agencies’ discretion in determining site access to congregate meal service.^{xv} The development and application of definitions of rural, rural pocket, and access to a congregate meal site were essential to implementation of non-congregate summer meals in 2023.

Rural Definitions

State Agencies. Many state agencies considered and approved non-congregate sites located in rural pockets outside of the [Summer Food Service Program Rural Designation map](#). Among state agency survey respondents, 22 states considered and approved rural pockets for summer 2023 (**Figure 1**). The most common data sources

used for determining rural pocket designations were those with expedited USDA approval including Rural-Urban Commuting Area Codes (RUCA), Rural-Urban Continuum Codes (RUCC), and Urban Influence Codes (UIC) ([USDA guidance](#)).^{xvi} Other popular data sources used to identify rural pockets included the [National Center for Education Statistics](#) (NCES) locale classifications and the [No Kid Hungry map](#) which mapped out the sources allowed for expedited approval—RUCA, RUCC, and UIC.^{xvii,xviii}

Figure 1. States that considered and approved rural pockets in summer 2023*



**Based on self-reported data from the NKH’s State Agency Survey*

Sponsors. The three most cited resources for defining “rural” sites used by NKH summer grantees were USDA County-Level Rural Designation (57%), RUCA (12%), and Locale Codes Individual Pocket Justification (8%) (**Table 1**). NKH summer grantees selecting “Other” reported using the USDA Rural Health Map, receiving a waiver from the state’s education department, receiving recommendations from a state’s agricultural department, or utilizing the SFSP Rural Designation Map. When asked if they felt their state’s definition of “rural” adequately reflected rural communities in their area or if they felt that definition limited where they could serve meals, 26% reported it limited them “a little”, 15% reported it limited them “a lot,” and 59% reported the definitions did not limit them at all.

Table 1. “Rural” definitions used among NKH summer grantees*

Definitions	# of Grantees	% of Grantees
USDA County-Level Rural Designation	62	57%
Rural Urban Commuting Area Codes (RUCA)	13	12%
Locale Codes Individual Pocket Justification	9	8%
Other	8	7%
National Center for Education Statistics (NCES)	6	6%
Rural Urban Continuum Codes (RUCC)	2	2%
Urban Influence Codes (UIC)	0	0%

**NKH summer grantees were able to report definitions through multiple options; therefore, the number of grantees and percentages of grantees exceeds 104 and 100%, respectively.*

Access to a Congregate Site

State Agencies. States implemented a wide range of definitions for “access to a congregate meal service” in summer 2023. Many states determined access to congregate meal service geographically based on distances including mile radii (ranging from a quarter mile to 10 miles),^{xxix,xx} within-school district boundaries, and within-city limits.^{xxi} Another common method used to determine access to a congregate site was through sponsor justification – either via program application or other information collection method.^{xxii,xxiii} Many state agencies also considered barriers to access like road safety concerns, transportation issues, staffing concerns, and days of service (e.g., congregate offered during the weekdays and non-congregate offered on weekends).^{xxiv}

Sponsors. Most NKH summer grantees were approved by their state agencies to serve non-congregate meal service prior to NKH funding awards. Still, when asked if they felt limited in where they could provide meals because of how their state defined congregate service access, 34% of NKH summer grantees reported it limited them “a little” and 23% reported it limited them “a lot,” while 43% felt “not at all” limited. It is important to note that NKH summer grants were awarded largely in states and areas that were approved for providing non-congregate summer meals; sentiments on limitations reflect those of the NKH summer grantees that completed NKH reporting.

Operating Congregate and Non-Congregate sites

One challenge sponsors and state agencies noted to the expansion of non-congregate meals reach in 2023 was the inability to operate concurrent and co-located congregate and non-congregate meal services, due to unclear and changing guidance. Many schools and community-based organizations provide congregate meals to students and children attending summer school and other on-site enrichment programs. As such, many of these sponsors faced challenges in providing non-congregate service, even if they were serving a separate group of children. Sponsors and state agencies also both expressed that with thoughtful integrity plans and communications with families, they would be able to operate concurrent congregate and non-congregate programs without children receiving duplicate meals from both meal service operations.^{xxv,xxvi,xxvii} During the state agency debrief, some states acknowledged discordance between what the state agency allowed and what the sponsors did; this discordance emerged from sponsors ensuring compliance with program rules while also overcoming site-specific barriers to meal provision.

Meal Distribution Models and Flexibilities

Non-congregate summer meals may be distributed in different ways, and state agencies had some discretion in the types of models that were allowed in summer 2023. Whereas congregate service typically involves consumption of food on-site and may be paired with educational activities or other kinds of programming, non-congregate meals are focused on distribution and include delivery model types such as walk-up, grab-and-go, mobile meals, curbside pickup, and home delivery. State agencies had the authority to determine which model type and flexibilities would be allowed in summer 2023

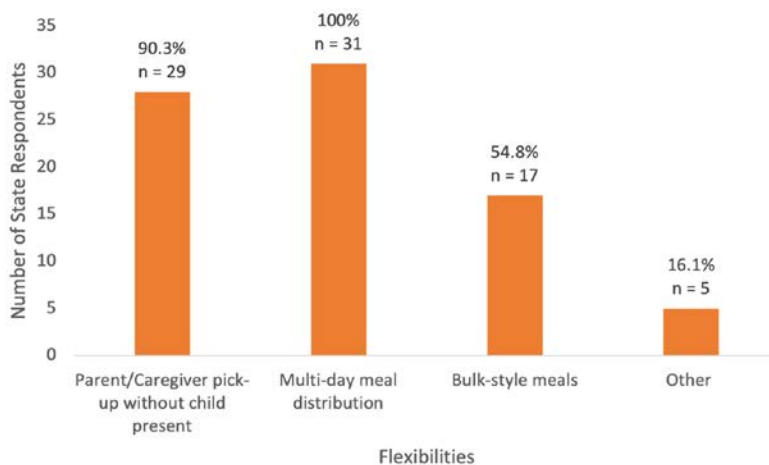
operations. Other program model flexibilities included parent/caregiver pickup without the child present, multi-day meal distribution for a certain number of days up to 10 days, and bulk-style meals (food items requiring some assembly and preparation by families).

State Agencies. The most typical model used for non-congregate meal service this summer was grab-and-go meals. Nine states^{xxviii} reported allowing home delivery models of non-congregate meal service. The states that did allow home delivery only had a few sponsors utilizing this model; those sponsors offering home delivery did report successful summer meal service. The biggest barrier for home delivery models, according to state agencies, was the changing guidance around memoranda of understanding (MOUs) with school food authorities (SFAs) to get income eligibility data for participants. One sponsor struggled so much to receive data from SFAs that they decided to collect their own household eligibility forms.^{xxix} Only a couple of the state agencies participating in the survey and debrief mentioned having sponsors that provided non-congregate meals through mobile meals; in these instances, the logistics of deciding placement of mobile routes was discussed.^{xxx}

According to state agency survey findings, many states allowed sponsors to use multi-day meal issuance and parent/caregiver pickup. Of 31 states responding to questions about the features of non-congregate meal service, all allowed multi-day meal issuance, 28 (90.3%) allowed parent/caregiver pickup without a child being present, 17 (54.8%) allowed bulk food distribution, and 5 (16.1%) allowed other methods. Despite being one of the most frequently allowed options, three state agencies said that implementing parent/caregiver pickup of meals without children present was one of their biggest challenges in implementing non-congregate meal service, particularly related to ensuring program integrity and coordinating meal pickup times (**Figure 2**).

Only six state agencies reported serving non-congregate meals outside of area-eligible locations,^{xxxi} according to state agency survey findings.

Figure 2. Non-congregate flexibilities offered in summer 2023 (n = 31 state respondents)



Sponsors. The two most cited distribution models for NKH summer grantees serving non-congregate meals were walk-up distribution (69%) and drive-thru/curbside distribution (63%) – these two distribution models accounted for 75% of all distribution models chosen, all of which are forms of grab-and-go (GNG). (Table 2).^{xxxii}

Table 2. Meal distribution models implemented by No Kid Hungry summer grantees*

Meal Distribution Models	# of Grantees	% of Grantees
Walk-up	72	69%
Drive-thru/curbside	66	63%
Along bus/mobile route	37	36%
Direct home delivery	25	24%
Home delivery via mail	1	1%

**NKH summer grantees were able to report service through multiple meal distribution options, resulting in frequency and percent of grantees exceeding 104 and 100%, respectively.*

NKH summer grantees’ top four most cited reasons for choosing these distribution models were current USDA/state guidance (66%), the distance between families and sites (65%), and families’ access to transportation (62%), with staff capacity ranking fourth (58%) (Table 3). These four reasons, combined, account for 55% of all selected reasons for meal distribution selections. NKH summer grantees selecting “other” reported city park location and other schools having a delivery bus as their reasons for selecting a particular meal distribution type.^{xxxiii}

Table 3. Reasons for selection of meal distribution type by No Kid Hungry summer grantees*

Meal Distribution Rationale	# of Grantees	% of Grantees
Current USDA/state guidance	69	66%
Distance between families/sites	68	65%
Family access to transportation	64	62%
Staff capacity	60	58%
Funding available	45	43%
Family preferences	34	33%
Equipment	31	30%
Population groups	26	25%
Partnerships	26	25%
Family safety	20	19%
Staff safety	16	15%
Procurement	10	10%
Other	2	2%

**NKH summer grantees were able to report rationale through multiple options, resulting in the number and percent of grantees exceeding 104 and 100%, respectively.*

A couple of state agencies shared, through individual discussions, results of their own sponsor surveys. In one state, GNG was the most frequently used model among summer meal sponsors. Some sponsors deployed more than one model (GNG, direct home delivery, and/or delivery via bus route). Most sponsors surveyed in another state indicated that they employed a “pick-up from a central location” model (yet another form of GNG).^{xxxiv}

As for program flexibilities reported by NKH summer grantees, 92 (88%) offered meal pickup options such as parent/guardian meal pickup, multi-day distribution, and/or bulk foods pickup, and only 12% indicated that they did not offer any of these options.^{xxxv} The most cited types of non-congregate meals served (**Table 4**) were shelf stable meals and refrigerated unitized meals (61% and 55% of NKH summer grantees, respectively).

Table 4. Types of meals served by No Kid Hungry summer grantees*

Meal Type	# of Grantees	% of Grantees
Shelf stable meals	63	61%
Refrigerated unitized meals	57	55%
Frozen unitized meals	33	32%
Bulk food items	28	27%
Other	19	18%
Serving line	19	18%

**NKH summer grantees were able to report non-congregate meals served through multiple meal options; therefore, the number of grantees and percentages of grantees exceeds 104 and 100%, respectively.*

Administrative Processes & Approvals

State Agencies. Although state agencies reported that FNS Regional Offices were quick to approve rural pockets, many felt that requiring Regional and National Office approval for rural pockets that met USDA’s expedited approval criteria (e.g., RUCA designation) was redundant and delayed the approval and planning process.^{xxxvi} For summer 2024, state agencies hope to have an expanded and more accurate definition of “rural” that won’t require so many pocket approvals, allowing for greater efficiency. All states emphasized that minimal time between guidance and implementation made summer 2023 difficult. Most state agency respondents (28 out of 33 respondents, or 84.6%) approved all eligible sponsors for non-congregate distribution. Nineteen states (59.4%) allowed sponsors new to SFSP and SSO to operate non-congregate in summer 2023 while 13 (40.6%) did not allow new sponsors. Eighteen state agency respondents approved both all eligible sponsors and sponsors who are new to summer meals programs, and three states neither approved all applicants nor allowed new sponsors. Ultimately, state agencies felt that the number of sponsors participating in non-congregate was not maximized.^{xxxvii}

Sponsors. Sponsors were generally unsatisfied with the speed of rural approval,^{xxxviii} although experiences varied by state.^{xxxix} However, sponsors in some states shared that their state agencies were encouraging and helpful during the application process and

the implementation of non-congregate meal service. In states with long approval processes, sponsors felt hindered in their ability to operate either additional non-congregate sites or non-congregate meal service in general.^{xi} Overall, sponsors struggled to implement non-congregate meal service due to the late roll out of guidance, slow approval processes, limited definitions of “rural,” and state-level operational limitations (e.g., unable to do multiple days’ worth of meals).

Non-Congregate Application & Claims Tracking

State agencies require significant lead time to make changes to sponsor application and meal claims systems. Due to this, nearly all state agencies were unable to make changes to the application in the time available and therefore required sponsors to submit a separate or supplemental application in order to be considered for non-congregate meal service operations.^{xii} Most state agencies were also unable to track non-congregate meals served in their claims systems. States that were able to track non-congregate claims utilized naming conventions (like “NC” for “non-congregate”) in their meal claims data.^{xiii} Because the Interim Final Rule (IFR) and 2024 guidance was not expected until the end of the 2023 calendar year (IFR published on December 29, 2023), many states have acknowledged they will not have their application system fully updated for 2024. Other states began making changes ahead of the IFR with recognition that the application will need additional modifications in years to come.^{xliii}

Program Integrity

Both state agencies and sponsors took steps to protect program integrity. Nearly all states conducted in-person site monitoring visits to all non-congregate sites. Most states took a conservative approach to what was allowable in 2023; with the experience from this summer (and more guidance), many state agencies plan to increase flexibility options for sponsors in 2024 (e.g., allowing parent pickup, multiple days’ worth of meals, home delivery, et cetera). Sponsors were able to modify the structure of their program (e.g., where and when they distributed meals) to protect against “double dipping” in the program.^{xliv}

Monitoring, training, and program integrity plans. State agencies described their program integrity activities through open-ended responses to the survey. Almost all state agency survey responses indicated that sponsor program integrity plans were required^{xlv} and many state agencies included site visits, administrative reviews, and/or compliance reviews among their sponsor sites. Three states highlighted their in-person or web-based sponsor training resources. Both state agencies and sponsors reported that having a dedicated state agency staff person to work with sponsors on their program integrity plans made for streamlined communications and more confidence in implementation.^{xlvi} One state agency staff member during the state agency debrief indicated a positive experience with developing integrity plans with sponsors, in particular the drafting and feedback process between sponsors and the state agency.^{xlvii}

Sponsor requirements. Three states responding to the survey said they limited the sponsors that could provide non-congregate meal service in summer 2023 only to those organizations that had prior experience providing such meals in the past. In individual NKH engagements with state agencies, some allowed sponsors with other specifications (such as those that previously operated non-congregate during the pandemic through waivers or those that did not operate the prior year with a surplus). Two state agencies indicated that the state agency must provide approval for sponsor menus and one state required formal, standard operating procedures from their sponsors.

In the state agency debrief, some states discussed not allowing community-based sponsors to operate non-congregate, only school sponsors. Acknowledging a lack of USDA guidance, another state agency took a similarly conservative approach and only allowed School Food Authorities to provide non-congregate meal service despite community-based organizations’ expressed interest in being sponsors. In this situation the state agency was concerned that providing oversight and technical assistance needed for community-based organizations would be too intense for their current staffing capacity.

Limiting program flexibilities. Some state agencies required parents to show identification in order to pick up their children’s meals, required parents to formally attest upon arrival that the meals are for their children and will be given to them, or required the participating child be present at the moment of meal pickup. In places where multi-day meals for pickup were allowed, some state agencies maintained certain limitations on the number of meals that could be provided (**Table 5**). Other program integrity efforts included limiting the number of sponsor sites, defining a distance boundary between a non-congregate meal service and a congregate meal service, requiring unitized meals, and requiring special approval to sponsors who wanted to provide home delivery of non-congregate meals.

Table 5. Number of days of multiple meals flexibility allowed by states

Number of Days’ Worth of Meals	Number of States
Not Reported	21
Allowed, but number of days not reported	4
10 days	2
7 days	6
5 days	4
4 days	1

Challenges and concerns. Some state agencies are concerned about balancing over-identification of children with integrity measures such as pre-registration, pre-ordering, or “proof” of children.^{xlviii} State agencies that were surveyed indicated that meal pickup without the child present, in particular, represented a challenge to ensuring program integrity and coordinating pickup times. Others pointed to state agency technology limitations (such as updating or upgrading their systems to track non-congregate meals) that relate to ensuring program integrity, limited capacity to support sponsor compliance with program regulations (such as meal pattern and meal count documentation), and how program integrity is maintained at open non-congregate sites. State agencies that responded to the survey also noted that USDA reporting requirements (such as calculating estimated number of non-congregate sponsors, sites, and meals served by type) was challenging.

Communications between State Agencies & Non-Rural Sponsors

While most states did not receive pushback from sponsors of congregate meal programs about not being able to operate non-congregate meals, they did hear significant disappointment and concern about participation in congregate sites. There were state agencies that applied for a non-congregate waiver due to safety concerns for their non-rural meal sites, none of which were approved, according to the state agency debrief discussion. Some city and suburban areas that operate summer programs feel unable to welcome community members into their space due to safety concerns. Sponsors serving non-rural areas feel that if they are permitted to operate non-congregate meal service, they could better service their communities. A major issue for non-rural congregate meal sponsors is communicating with families that non-congregate meal service is not an option, even if it is available in neighboring areas or was in previous years.

Family Preferences for and Community Experiences with Non-congregate Meals

Stated benefits of non-congregate meal service. According to case studies and discussions with caregivers, non-congregate summer meal service can benefit those struggling to make ends meet. Families with low income that live in rural areas endure financial hardships during summer months when there is no school meals service. In a survey of 600 parents with low income living in rural areas, respondents with the least household income reported experiencing hunger the most often, and respondents said they spend more on groceries for their families during the summer. In the prior 12 months, eighty-two percent of respondents often or sometimes worried whether their food would run out before they had money to buy more (**Figure 3**), and seventy-two percent of respondents said that often or sometimes the food they bought just didn't last and they didn't have money to get more (**Figure 4**). Forty-one percent of respondents said that sometimes or often their children were not eating enough because they just couldn't afford enough food (**Figure 5**).

Figure 3. Percent of respondents in the past 12 months who were worried that their food would run out before they got money to buy more

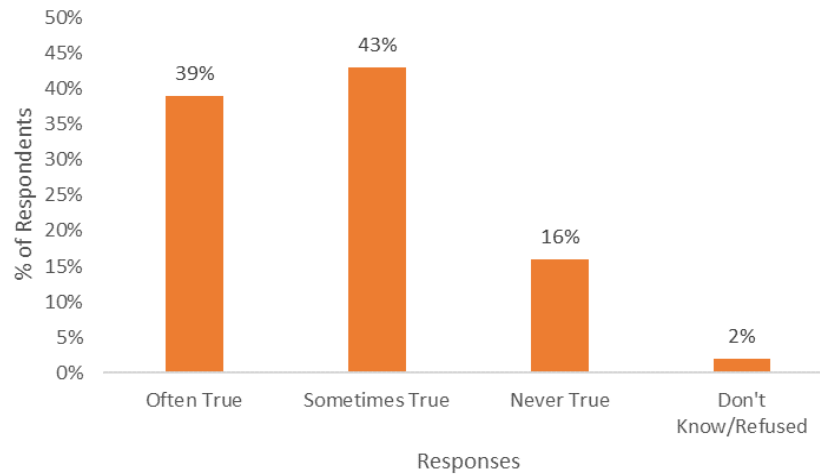


Figure 4. Percent of respondents in the past 12 months who said that the food they bought just didn't last and they didn't have money to get more

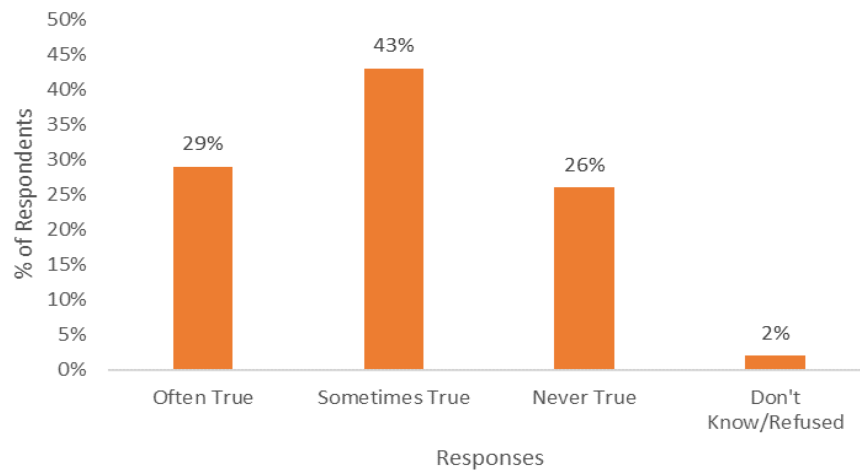
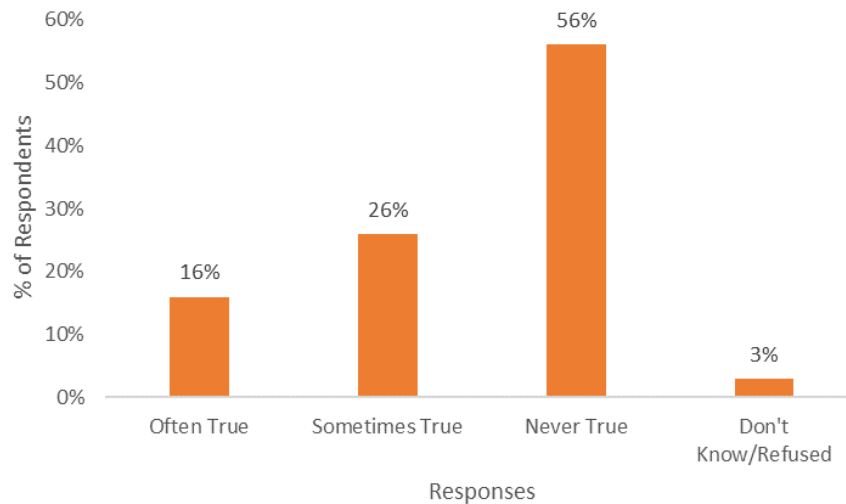


Figure 5. Percent of respondents in the past 12 months who said their children were not eating enough because their families just couldn't afford enough food



Participants felt the program can also enrich entire communities, not just individuals and families. Program providers shared anecdotes about how the program helped, for example, caregivers with a terminal cancer diagnosis, a family whose house was gutted by a fire, a mom who was recently divorced and caring for a child with special needs, and grandparents raising their grandchildren – some of whom may not have been receiving other benefits, but who were currently in need of the support the meals provided. ^{xlix}

Desired attributes of non-congregate meals and sites. Survey respondents noted attributes of take-home meals that were important to their families. Seventy percent of families said that they would be more likely to participate in non-congregate meal programs if they include multiple days' worth of meals, can have meals delivered to their home, and allow for parent pickup without children present – other take home meals preferences appear in **Table 6.**ⁱ

Field observations and discussions with caregivers indicated that offering “fan favorites” from the school year during the summer brings joy to children, as they recognize their favorite foods.ⁱⁱ Caregivers in field discussions cited that participating in summer non-congregate meals helped them prepare their younger children for how to open packaging and milk cartons and provided an experience for the child about what to expect when starting school for the first time when many things will be unfamiliar.ⁱⁱⁱ

Table 6. Important factors for take-home meal pick-up sites*

Attribute	Proportion More Likely to Participate
Knowing that the meals include food your children will like and eat.	77%

The area is safe.	76%
They provide multiple meals for the day, like breakfast and lunch, that your child can take home in a single pickup.	73%
Having meals delivered to your home.	71%
Knowing that meals have to meet specific standards to ensure children are eating healthy, nutritious meals.	71%
Having a website with detailed information about the program available.	71%
Your child can pick up food for their siblings even if they are not present.	70%
They provide meals for multiple days that child can take home in a single pickup.	70%
Being able to pick up meals at your convenience on your child's behalf without your child present.	70%
Being able to schedule meal pickups.	70%
They provide food in bulk to take home, like milk and loaves of bread instead of pre-assembled meals.	68%
The location is within biking or walking distance of your home.	65%
Knowing that most other families at your school were also using the program.	63%
There are other activities and childcare available at the site.	60%
The location is accessible to public transportation.	59%
Your child can get there alone.	43%

**Survey question: Here is a list of attributes of a school or community organization where families take home free meals for their kids during the summer. Please indicate if this attribute would make you much more likely or somewhat more likely to get these free meals.*

In caregiver interviews, participants spoke highly of the quality of the food, the ability to get multi-day meals at once, and the choice of foods (echoing findings from the survey of rural families). There was little to no food wasted when caregivers could allow kids some choice in what they want to eat and figure out when and how to best serve the food. Caregivers reported that it cut down on junk food consumed. For some participants, the food was familiar and comforting and their kids ate better than what they might eat on their own - these insights echo findings from the survey of rural families.^{liii}

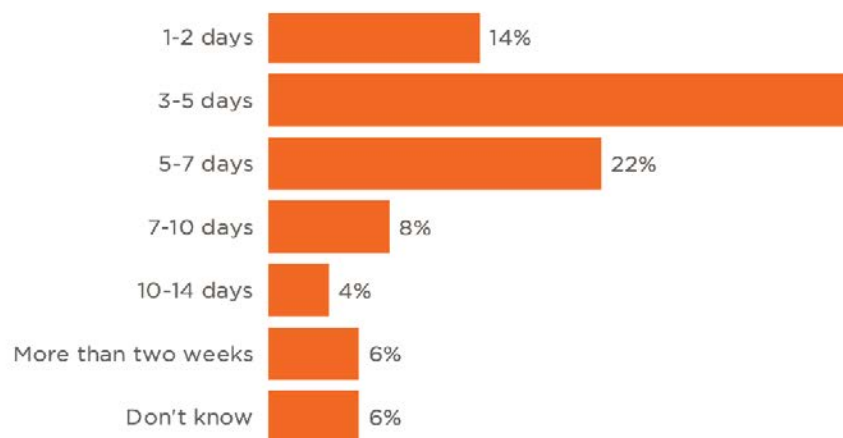
Preferences for meal service type. According to discussions with caregivers and communities, non-congregate meal service is the most accessible, equitable, and

successful option. It addresses barriers around disability, transportation, age, work schedules, and childcare responsibilities. A majority of rural family survey respondents said having access to both congregate and “take home” (non-congregate) meals is important to them. When asked to choose between taking meals home or eating them in a congregate setting, 58% preferred to take meals home to their children, and this preference cuts across demographic categories. Take home meals offer convenience and comfort to their children while also allowing food to be saved for later. More than seven in ten respondents said they’d likely pick up meals to take home for their kids, and two-thirds of respondents (who live in rural areas) would likely participate in congregate meals if they were available.

Preferences for multiple meal pickup. During interviews, caregivers indicated that receiving multiple days’ worth of meals allowed for greater choice and, subsequently, increased food consumption by their children.^{iv} Echoing caregiver sentiments from interviews, rural family survey respondents most often indicated a preference for 3 to 5 days’ worth of meals for pick up (40% of respondents) (**Figure 6**).

Figure 6. Preferred quantity of food for pickup

If a site were to provide prepared meals to take home, how many days’ worth of meals would you like to be able to pick at once?



Preferences around parent pick-up. Regarding picking up meals, parents indicated that they were more willing to travel further distances to take their children to pick up meals, eat on-site, or receive childcare than they were to let their children travel alone to get meals. More than a quarter of rural family survey respondents indicated unwillingness to allow their children to go alone to get meals. Parents prefer distribution options that are both safe and minimize logistical challenges (e.g., providing clear website-based information, allowing parents to schedule pick ups, and being able to pick up meals for siblings or when a child is not present).

Aspects of non-congregate service that work well for families. Interviews with parents and three programs indicated certain aspects of non-congregate meal service that worked well. Employing a designated person who can answer families’ questions about the program, who is also knowledgeable, warm, and respectful, creates a

welcoming participant experience. Supporting a fun, familiar, and welcoming environment worked well for program staff. Proactively reaching out to families to encourage participation was also helpful. Availability of a variety of food items allowed caregivers to support their children’s dietary needs and food preferences. One grandmother described her physical conditions that limit her ability to obtain and prepare food. If there are multiple options, like a variety of choices of fruit, her grandchildren can grab something for themselves to eat. Being able to use and combine foods when needed meant there was little to no food waste.^{lv}

Summary of key takeaways from case studies and caregiver interviews. NKH Innovation team efforts revealed that there is a lot to do to improve customer service, participant-facing resources, communications, and messaging in summer non-congregate meal service that could address participation barriers and create a more positive experience for families. First, program rules need to be clearly communicated to participants before they attempt to access a program. After arriving at sites to pick up non-congregate meals, some parents were told that children need to be present, which is an inconvenience to caregivers and can cause caregivers to feel stress and shame. Non-congregate summer meal service needs to convey permanence, reliability, and consistency among families. During interviews, families frequently premised their remarks with “if this exists next year” and worry it won’t be available in the future. Informational materials beyond fliers (e.g., text messages) would also improve communications with parents. Families need to know that their participation helps their school and community, and it was noted that state agencies and sponsors should stress the benefits to the community, school, and nutrition staff. Families often worry they are taking something away from those that need it more, so state agencies and sponsors should challenge misconceptions about the program and positive messaging framing, such as the fact that income is not a factor in determination of eligibility.

Sponsors shared a number of needs regarding capacity, clarity of communications, and customer service. Sponsors emphasized the need for funds to cover storage space for food and delivery, especially walk-in freezers, refrigerators, coolers, thermal bags, refrigerated trucks, and vacuum sealers. Sponsors felt stress due to unclear guidance from government agencies and feared unintentionally breaking rules that seemed unclear. Provision of clearer guidelines, guidance, and best practices would improve sponsor confidence in operating their programs. During the three case studies, school nutrition directors expressed confusion over rural definitions and felt that there were many sites not approved for non-congregate meal service. Reducing stress and uncertainty felt by sponsor staff would help prevent those sentiments from influencing customer service. In turn, sponsors should ensure there is a point person who can answer families’ questions and offer good, welcoming, and kind customer service.

Conclusions

Successes

State Agencies. Overall, state agencies said that this new non-congregate summer meal service in rural areas allowed more children to access meals when school was out and also allowed programs to reach more families that historically lacked access to meal site locations. State agencies felt successful at improving summer meal participation rates, and many felt that meal service types (more meal sites, mobile routes, drive-up sites) and flexibilities (such as bulk foods) provided them with the flexibility needed to bring more meals to more kids during the summer. State agencies listed a number of successes with implementation of non-congregate meal service in rural areas during summer 2023.

Sponsors. Sponsors were thrilled at the extended reach non-congregate meal service provides their communities. They also felt that their partnerships and connections with other local community organizations was key to successful programming, and they took pride in offering high-quality, nutritious meals.

Challenges Encountered

State Agencies. State agencies reported a variety of challenges in our open-ended survey responses. Most state agency respondents specifically called out the lack of timely and accurate guidance from USDA on aspects of program administration and operation (for example, the lack of guidance on defining a rural area with “no congregate service”). Administering summer non-congregate meal service at the state agency level requires much coordination and accountability – state agencies noted administrative activities that were particularly challenging in 2023, including program oversight and management, selection (including the application process as well as ensuring one sponsor per rural area) and education (including training on eligibility and program rules) of sponsors, identification of eligible rural areas, tasks related to program integrity, and modifications or upgrades of claims systems to allow for tracking of meals and participation. State agencies said the approval process for non-congregate model types (e.g., grab-and-go) and flexibilities (e.g., providing bulk foods) was challenging and, in summer 2023, some state agencies did not allow for certain model types and flexibilities.

State agencies experienced difficulties in receiving consistent data across sponsors, limitations in the granularity of data that helps resolve whether meals served at a site are congregate or non-congregate (to assure compliance with rules), and long wait times for data to be received from sponsors. State agencies emphasized that technology updates and upgrades to account for non-congregate summer meal service require more time to complete, and some state agencies indicated such updates would not be completed for summer 2024.

The remaining challenges identified by state agencies were parent- and child participant-facing. At the state agency level, staff felt that assuring food safety was challenging. The delayed receipt of information from USDA resulted in less time for preparing for 2023 summer non-congregate meal service, and staffing at state agencies was consistently limited across states. One state agency was concerned about the lack of variety among the foods offered to children through summer non-congregate meal service, another state was concerned about limited participation in the program, and another was concerned with the amount of food wasted through the program as well as how to ensure children participating are eating the foods provided. Offering the option to schedule meal pickup for parents was also a challenge.

Sponsors.^{lv} In their own discussions with and surveys of sponsors, two state agencies summarized sponsors’ sentiments that the biggest encountered challenges in 2023 implementation were difficulties getting a variety of products (especially pre-sliced and packaged), staff morale (unpredictability of participation at pickup sites), and resource limitations (drivers, vehicles, and cooler-refrigerated storage). Overall, the three most commonly selected challenges among NKH summer grantees were transportation and logistics of meals (46%), unpredictable meal counts (35%), and staffing capacity (25%). (Table 7). Major themes emerging from NKH summer grantee narratives included: meal service logistics, program planning, staffing, and program finances. Sixty-nine percent of NKH summer grantees leveraged their grant funds to address their reported challenges.

Despite offering a variety of meal distribution models (i.e. bulk meals, home delivery, parent pickup, etc.), 47% of NKH summer grantees identified families that still encounter challenges to local meal program access. Lack of available transportation to meal distribution sites and distribution times were the most commonly reported challenges related to families’ program access. Among NKH summer grantees who identified families’ program access challenges, 90% made adaptations to improve accessibility and 86% of these respondents felt the adaptations were sufficient. The most common adaptations were to add additional distribution sites (40%) and increase home delivery offerings (31%) followed by extended pickup times (12%) and additional marketing (9%). NKH summer grantee narratives from the field highlight the quick pivoting sponsors took overcome rural families’ access barriers to summer non-congregate meal service.

Table 7. NKH summer grantees’ reported challenges and adaptations

	Reported Challenge	# of Grantees	% of Grantees	How Grantees used NKH Funding to Address Reported Challenges
Meal Service Logistics	Transportation and logistics of meals	48	46%	Bolster transportation by purchasing or renting additional vehicles or covering additional gas-related expenses
	Procurement of food, packaging, equipment	25	24%	
	Storage restriction	2	2%	

	Transportation issues	1	1%	Purchase additional hot/cold food storage equipment and meal packaging (i.e. boxes, bags, etc.).
Program Planning	Unpredictable meal counts	36	35%	
	Uncertainty/ability to plan	16	15%	
	Lack of planning time	14	13%	
Staffing	Limited staffing capacity	26	25%	Increased staff wages, including: <ul style="list-style-type: none"> • Extra stipends for AmeriCorps • Pay for drivers and site staff to serve at additional sites • Pay for additional staff to package meals
	Low staff wages	16	15%	
	Staffing retention	12	11%	
	Need for staff training	4	4%	
	Recruiting new staff	4	4%	
Program Finances	Increased costs associated with program operations	17	16%	
	Finances	15	14%	

Lessons Learned

State Agencies. In addition to responses to question items, state agencies also shared screenshots of their tracking systems through the state agency survey. Insights from debriefs, individual discussions, and surveys indicate that making data system updates will take more time and resources. Based on reviewing these screenshots, state agencies should consider updating their data systems to allow for meal counts to be collected by congregate versus non-congregate status. This level of granularity will allow state agencies to comply with USDA reporting requirements and allow for easier and more flexible and precise reporting and analysis. Simply tracking which sites are offering non-congregate meals may be insufficient – according to guidance, while congregate and non-congregate meal service cannot be provided for the same meal (e.g., lunch or breakfast) on the same day, a site can serve both non-congregate and congregate meals in the same claim period.^{lvii}

The option to capture both congregate meals and non-congregate meals for the same claim period is important. How this is best accomplished will depend on the structure of the state agency’s existing data system. State agencies that have already accomplished this update have done so either by: (1) having separate records (i.e. rows) for congregate and non-congregate meals, or (2) by adding fields (i.e. columns) to existing records to show congregate meals and non-congregate meals in different fields.

Sponsors. A number of sponsor-focused lessons learned were captured through discussions and surveys. One state conducting their own sponsor surveys indicated increased participation in summer 2023 compared to summer 2022, explaining that they experienced “much larger participation once we offered the delivery option and we could have done more if I could have qualified families living in the open site area.” The majority of lessons learned provided by NKH summer grantees involved planning early

and centering the end-user (i.e., children and families) in program design. Lessons learned as relayed by NKH summer grantees include program logistics, marketing and advertising, the benefits of non-congregate meals, menu design, staffing and staff training, unexpected increases in needs at sites, the value of partnerships, and site location considerations. Of note, NKH summer grantees learned that an important benefit of summer 2023 non-congregate meal service was an increase in children receiving meals.

Other lessons learned by NKH summer grantees focused on program logistics, including planning for summer meal service early, considering online ordering, addressing transportation options, and offering distribution times that allow for predictable service and family-centered schedules. NKH summer grantees noted that the opportunity to open more site locations must be informed by the proximity of potential locations to children and parents in addition to the likelihood that sites (both old and new) may experience increased needs. Meal service requires dedicated skilled staff; NKH summer grantees said increases to staff pay should be explored and staff-to-site ratios and staff training should be considered in planning. Partnerships with community agencies like schools, parks, community centers, recreation programs, churches, and others should be established in order to help identify sites where summer meals can be served and awareness of the program can be raised. To raise awareness, NKH summer grantees learned that advertising efforts should start early, should use banners and flyers, and should leverage social media.^{lviii} A number of these insights were echoed individually by state agencies relaying learnings from their own data collections with sponsors.^{lix}

Case studies further refined our understanding of how different non-congregate service model types performed. Mobile meals worked well where implemented – the sponsor carefully considered the neighborhoods that were highest-need and came up with plans to successfully set up mobile meals programs there. Grab-and-go worked least well where implemented – in this case study it was the least convenient for families and didn't offer the choice of meals and multiple days' worth of meals that families preferred. Grab-and-go also subjected families to some of the same inconveniences, discomfort, and scrutiny of congregate meals (e.g., families being turned away if their children were home sick). Note that case studies, although providing a richer context of implementation experiences, are not generalizable to the broader community of programs across the country.

Recommendations

Recommendations for USDA^{lx}

A number of actions for USDA are recommended based on insights learned from state agencies, sponsors, and families. Recommendations listed below have been modified taking into account what is included in the Interim Final Rule (IFR) released on December 29th, 2023.^{lxi} State agencies emphasized that it is hard to train potential non-congregate sponsors when federal guidance for the program is unclear about what is allowable. Thus, recommendations for USDA specifically include provision of guidance for state agencies that is clear and specific beyond what has already been clarified by the IFR.

Guidance, Timeline, & Approvals

- **Guidance and plan approvals should be issued to state agencies (and their sponsors) in a more timely fashion from USDA national and regional offices.** Earlier guidance and approvals provide more time for state agencies and sponsors to prepare for upcoming summer non-congregate meal service.
- **The process for receiving approvals for summer non-congregate meal service plans should be clearer and more transparent.** It should be clear when state agencies can expect to receive responses about approvals from USDA, so that they will know when they can provide their own guidance and training to sponsors. Similar clarity and transparency should be applied to processes for appealing approval decisions.
- **Additional guidance should be provided to state agencies on methods for defining access to a congregate site.** State agencies have used distance measures as part of their working definitions, but there are safety, transportation, and time elements to consider among other factors influencing children's access to congregate sites. It could be helpful for USDA to share a summary of how states have been making these determinations.
- **Further guidance should be provided on program integrity measures for situations when non-congregate meal sites are located near congregate meal service.** This would allow for the placement of non-congregate sites that serve different children than the ones at the congregate (e.g., congregate sites serving summer school students). State agencies noted that this lack of clarity prevented more non-congregate sites from being able to operate.

Technology & Meal Claims Tracking

- **Provide clear guidance to state agencies on how sponsors should claim non-congregate meals.** The better the guidance provided to state agencies on

how sponsors should properly claim non-congregate meals, the better the counseling and training state agencies can provide to sponsors on this topic.

- **Support applications and meal claims systems updates among state agencies.** Providing support will help state agencies improve the sponsor experience of submitting applications to provide non-congregate meal service and improve the method of non-congregate meals tracking and, thus, more specific and accurate reporting.

Recommendations for State Agencies

In light of the data collected as well as the IFR, the following items are recommended for state agencies.

Administration

- **Allow sponsors to operate all meal service model types, especially home delivery.**^{lxii} This will ensure that non-congregate meal service responds to needs and maximizes participation among eligible families. The home delivery model in particular may be needed to reach families who cannot travel to pickup meal sites because of transportation or other limitations. Rural non-congregate models allow communities to design summer meals programs that meet their specific needs. Every community has their own unique mix of resources, opportunities, and challenges – state agencies should enable sponsors to use all non-congregate model types so that sponsors can design non-congregate meal service that responds to the needs of local communities. Designed non-congregate meal service should overcome known barriers to participation in the communities surrounding meal sites. Guidance should clearly explain how to successfully execute meal service model types while being in compliance with program rules.
- **Minimize the circumstances in which sponsors are denied the opportunity to utilize the program flexibilities allowed by USDA, including multi-day meals, bulk meals, and parent pickup without a child present.** This will enable sponsors to design programs that truly reflect rural family needs in their communities. Work closely with sponsors to ensure they can implement these flexibilities. Get input from USDA and other state agencies on best practices for how to maximize the availability of these options while still maintaining program integrity. However, it should be recognized that what state agencies allowed in 2023 was also influenced by how much staff they had to provide oversight and monitoring.
- **Maximize the number of sponsors that can participate by developing efficient application processes.** The experiences from summer 2023 show that there needs to be efficient and clear processes for sponsors to submit applications for non-congregate meal service, allowing sponsors enough time to

both provide all necessary information to the state agency and prepare for their meal service operations. Timelining for sponsor applications and approvals should be balanced with giving sponsors enough lead time to prepare for summer meal service.

Sponsor Support

- **Provide ample communication about rural non-congregate meal service as a new opportunity.** Starting new programs requires continuous and effective communication to ensure all current and potential stakeholders are aware of the opportunity. Because congregate meals have not been a more useful programmatic model in rural communities, there are many community stakeholders that may not already be connected into the Summer Food Service Program or Seamless Summer Option of the National School Lunch Program. State agencies should explore how they can leverage government and non-governmental partners to spread awareness about summer meals programs and bring new stakeholders into the rural non-congregate arena as sponsors, sites, or supporters of the program. Key stakeholders include schools (state associations, school nutrition directors, administration, and educators), community organizations that offer child services, health care, faith-based organizations, and entities such as local, county, and state governmental education, health, and social service agencies such as WIC, SNAP, Medicaid, and others.
- **Provide guidance and technical assistance to sponsors who want to offer both congregate and non-congregate meal service.** State agencies can provide clear guidelines and requirements for sponsor integrity plans that outline how implementation of both meal services at a single site will conform with program rules. State agencies, learning from the community of sponsors within their state, can disseminate these best practices to uphold program integrity and reduce duplication of meal provision among participants (that is, how to prevent children from receiving the same meals from both services). State agencies should provide guidance, either written, in webinar form, or both, to these sponsors; such guidance should clarify how to prepare applications and supporting materials. Work closely with sponsors to develop operational integrity plans that maximize participation of eligible families with minimal ambiguities.^{lxiii}
- **Co-develop effective meal claims processes with sponsors.** Ensure that sponsors know how to clearly document congregate and non-congregate meals in reporting. If systems cannot be changed to make this process easier, make sure that sponsors receive clear reporting instructions to minimize errors in tracking types of sites (congregate, non-congregate, or both) and meals (congregate and non-congregate).
- **Offer educational webinars on non-congregate meal service eligibility and implementation to sponsors.** Some state agencies offered in-person or web-based sponsor education. Training is useful for clarifying application processes

and program rules for sponsors. Periodic sponsor education can include a variety of implementation-focused topics that help improve service delivery for program participants while maintaining program integrity. Examples of topics include but are not limited to participant eligibility, meal tracking and reporting, model type discussions (grab-and-go, mobile meal routes, or home delivery), or innovative methods for procurement of products for non-congregate meals (such as pre-sliced or packaged) that respond to sponsor site and family needs. Additionally, some rural sponsors may find traveling to in-person training burdensome, so sponsor training should offer virtual components to overcome sponsor-focused challenges.

Recommendations for Sponsors

Our data collections and the recent IFR also informed recommendations directed at sponsors and how they provide meal service to families.

Meal Service Types & Flexibilities

- **Offer meal delivery whenever possible.** Few states allowed home delivery in 2023, according to the group state agency debrief discussion. Our state agency survey and state campaigns tracker indicated that nine states allowed the home delivery meal service model, but few sponsors utilized it. Caregiver interviews highlighted the benefit of home delivery, whereby caregivers who cannot physically attend a location can still make sure their children receive meals for which they are eligible. The home delivery option provides a pathway for children to receive meals while overcoming barriers typically encountered when having to physically attend meal sites, for example at congregate meal service sites or grab-and-go non-congregate meal service.
- **Offer scheduled pick-up times to parents and caregivers for grab-and-go style non-congregate meals.** Available pick-up times should be informed by parent and caregiver work schedules and local family routines.
- **Offer meals throughout the full duration of summer breaks.** Some rural sponsors only offered meals for a portion of the summer break when schools were closed. Offering meals for the entirety of summer breaks assures that children in rural areas have access to meals throughout the summer.
- **Offer multiple days' worth of meals to be picked up.** Our state agency survey and state campaigns tracker indicated that about 32 states allowed for multi-day meal pickup, with seven days' worth of meals being the most frequently provided amount. This option minimizes the number of journeys that families need to make to receive meals.

Implementation & Operations

- **Create and implement training for site staff to improve their knowledge of non-congregate program operations and rules.** Our discussions with state agencies and sponsors echoed similar confusions about how to implement aspects of non-congregate meal service in 2023. Similar to the recommendation for state agencies to provide training to sponsors on, for example, program integrity activities, sponsors should offer training to site staff that help improve knowledge about program rules and operations.
- **Conduct customer service-oriented training for site staff.** Our discussions with state agencies, sponsors, and case studies and discussions with caregivers indicate families value a warm and respectful site environment that is “fun, familiar, and welcoming,” even when those environments are providing non-congregate meals. Customer service-oriented training should build upon site staff’s abilities to create warm and respectful environments, to provide service that promotes dignity and does not stigmatize program participants.
- **Design meal pickup processes that are predictable and consistent, site locations that are safe, and meal choices that respond to children’s preferences.** Despite schools closing for the summer, parents and caregivers continue to work during this time. Caregiver interviews noted how a given meal service type (grab-and-go, home delivery) was helpful for their particular circumstances. The 2023 survey of rural families indicated numerous preferences respondents had for where sites are located, the quality and safety of those sites, and how their children get to those non-congregate sites. Additionally, the rural families survey and case study findings indicate a desire for meals that both include foods that children enjoy eating and are similar to what is offered in local school meals. Designing a participant-centered, non-congregate meal service experience assures that meals successfully reach children while improving participant experiences.

ⁱ Food & Nutrition Service (2023). “Summer Food Service Program.” <https://www.fns.usda.gov/sfsp/summer-food-service-program>

ⁱⁱ Food & Nutrition Service (2022). “An Opportunity for Schools.” <https://www.fns.usda.gov/cn/opportunity-schools>

ⁱⁱⁱ Share Our Strength - No Kid Hungry. (2024). <https://bestpractices.nokidhungry.org/programs/summer-meals?tab=implementation-strategies#implementation-strategies-5>

^{iv} Food & Nutrition Service (2023). “Summer Electronic Benefit Transfer for Children (SEBTC).” <https://www.fns.usda.gov/ops/summer-electronic-benefit-transfer-children-sebtc>

^v Surveyed state respondents included Alaska, Arizona, Colorado, Florida, Georgia, Hawaii, Idaho, Indiana, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Missouri, Montana, Nebraska, Nevada, New Hampshire, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Texas, Vermont, Virginia, Washington, West Virginia, Wisconsin, Wyoming.

^{vi} Bontrager, A. & Dunphey, K. (2023). “2023 Summer Non-Congregate Grants Analysis.” Internal Report. Grant Analysis. Internal Report. November 27, 2023.

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- vii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- viii Pokorney, P, Panzera, AD, Vega, CW, Kirk-Epstein, M. (2023). State Agency Survey. Online survey with email-based recruitment. October 11 – November 11.
- ix State agencies could decide what constituted a “rural pocket.” They used several data sources to support these designations when submitting information to USDA. Although helpful at compiling information across respondents quickly, surveys like the State Agency Survey are limited at capturing more in-depth contextualizing information around concepts like the uncertainty State Agency staff felt about rural pocket designation guidance.
- x Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xi Food & Nutrition Service (2023). Implementation Guidance: Summer 2023 Non-Congregate Meal Service in Rural Areas - Revised. Accessible at: <https://www.fns.usda.gov/sfsp/implementation-guidance-summer-2023-non-congregate-meal-service-rural-areas>
- xii U.S. Congress (1989). 7 C.F.R. § 225.2. <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-225>
- xiii Food & Nutrition Service (2023). Implementation Guidance: Summer 2023 Non-Congregate Meal Service in Rural Areas - Revised. Accessible at: <https://www.fns.usda.gov/sfsp/implementation-guidance-summer-2023-non-congregate-meal-service-rural-areas>
- xiv U.S. Congress. (2022-2023). Consolidated Appropriations Act, 2023. PL 117-328, section 502. Increasing Access to Summer Meals for Children through EBT and Alternative Delivery Options.
- xv U.S. Congress. (2022-2023). Consolidated Appropriations Act, 2023. PL 117-328, section 502. Increasing Access to Summer Meals for Children through EBT and Alternative Delivery Options. Page 4.
- xvi Food & Nutrition Service (2024). https://www.fns.usda.gov/sites/default/files/resource-files/SFSP03-2024_SP05-2024os.pdf#page=3
- xvii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xviii Pokorney, P, Panzera, AD, Vega, CW, Kirk-Epstein, M. (2023). State Agency Survey. Online survey with email-based recruitment. October 11 – November 11.
- xix Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xx Pokorney, P, Panzera, AD, Vega, CW, Kirk-Epstein, M. (2023). State Agency Survey. Online survey with email-based recruitment. October 11 – November 11.
- xxi Pokorney, P, Panzera, AD, Vega, CW, Kirk-Epstein, M. (2023). State Agency Survey. Online survey with email-based recruitment. October 11 – November 11.
- xxii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xxiii Pokorney, P, Panzera, AD, Vega, CW, Kirk-Epstein, M. (2023). State Agency Survey. Online survey with email-based recruitment. October 11 – November 11.
- xxiv Pokorney, P, Panzera, AD, Vega, CW, Kirk-Epstein, M. (2023). State Agency Survey. Online survey with email-based recruitment. October 11 – November 11.
- xxv Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xxvi Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). No Kid Hungry Staff Debrief. Internal Discussion.
- xxvii Share Our Strength - No Kid Hungry. (2023). Notes from individual discussions with state agencies. Periodic and direct communications.
- xxviii This number was calculated from both state agency survey responses (4 states) and conversations with state partners (5 states). It does not reflect all states that may have operated this model type.
- xxix Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xxx Share Our Strength - No Kid Hungry. (2023). Notes from individual discussions with state agencies. Periodic and direct communications.
- xxxi Area eligibility refers to the use of school or census data to determine whether a location is eligible for program sponsors to provide free meals instead of collecting individual household applications.

- xxxii Bontrager, A. & Dunphey, K. (2023). "2023 Summer Non-Congregate Grants Analysis." Internal Report. November 27, 2023.
- xxxiii Bontrager, A. & Dunphey, K. (2023). "2023 Summer Non-Congregate Grants Analysis." Internal Report. November 27, 2023.
- xxxiv Share Our Strength - No Kid Hungry. (2023). Notes from individual discussions with state agencies. Periodic and direct communications.
- xxxv This information was gathered from NKH grantee reports through an item ("If allowed, did you allow for parent/guardian meal pickup, multi-day distribution, or bulk foods pick-up?") that has a yes/no response. Percentages for each flexibility listed is currently unavailable.
- xxxvi Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xxxvii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xxxviii Share Our Strength - No Kid Hungry. (2023). Notes from individual discussions with state agencies. Periodic and direct communications.
- xxxix Share Our Strength - No Kid Hungry. (2023). Notes from individual discussions with state agencies. Periodic and direct communications.
- xl Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). No Kid Hungry Staff Debrief. Internal Discussion.
- xli Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xlii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xliiii Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.
- xlix McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September.
- ¹ Panzera, A., Kirk-Epstein, M., Del Puppo, L. Carolyn Paige and Dave Metz (2023). "Survey of Rural Families."
- ⁱⁱ McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September.
- ⁱⁱⁱ McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September.
- ⁱⁱⁱⁱ McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September..
- ^{lv} McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September.
- ^{lv} McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September.
- ^{lvi} Bontrager, A., & Dunphey, K. (2023). "2023 Summer Non-Congregate Grants Analysis." Internal Report. November 27, 2023. [Grants Analysis Report](#)
- ^{lvii} <https://fns-prod.azureedge.us/sites/default/files/resource-files/sp05-sfsp01-2023-revised-030923.pdf#page=3>
- ^{lviii} Bontrager, A., & Dunphey, K. (2023). "2023 Summer Non-Congregate Grants Analysis." Internal Report. November 27, 2023. [Grants Analysis Report](#)
- ^{lix} Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). No Kid Hungry Staff Debrief. Internal Discussion.
- ^{lx} Pokorney, P. et al. (2023). No Kid Hungry Staff Debrief, State Agency Debrief, & State Agency Survey.

-
- ^{lxi} Food & Nutrition Service (2023). Interim Final Rule: Establishing the Summer EBT Program and Rural Non-Congregate Option in the Summer Meals Program. December 29. Accessed at: <https://www.fns.usda.gov/summer/fr-122923>
- ^{lxii} Pokorney, P. et al. (2023). NKH Staff Debrief, Group State Agency Debrief, & State Agency Survey; Panzera, A. et al. (2023). 2023 Survey of Rural Families and Summer Meal Service; McKee Brown, A. (2023). "Rural Non-Congregate Summer Meal Service: Understanding the Caregiver Experience." Internal Report, Program Innovation Team, Center for Best Practices. September.
- ^{lxiii} Pokorney, P. Vega, CW, Kirk-Epstein, M, Panzera, AD. (2023). State Agency Debrief. Share Our Strength – No Kid Hungry. Zoom-based group discussion. October 16.