

APRIL 2024

RURAL NON-CONGREGATE SUMMER MEALS IMPLEMENTATION IN 2023: STATE AGENCY SURVEY BRIEF

Overview

In 2023, state agencies administering summer meals programs, including the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO) of the National School Lunch Program (NSLP), were now able to offer those summer meals through non-congregate settings in rural areas. Share Our Strength No Kid Hungry (NKH) conducted a cross-sectional study among state agencies administering summer meals programs across the country in summer 2023 to learn about the experience of implementing the first permanent non-congregate meal service in rural areas.

In summer 2023, more sponsors were approved to operate non-congregate meal service and thousands of distribution sites brought meals to more children in rural areas. Most state agencies that administer summer meals programs approved all eligible sponsors looking to operate non-congregate meal service. Meal service models like grab-and-go, mobile meals, and home delivery, and flexibilities like bulk-style meals, multi-day meal distribution, and parent/caregiver meal pickup without children present helped meet the needs of local rural communities. While state agencies noted that administering a new program under a short time frame was challenging in 2023, state agencies felt the new permanent non-congregate meal service allowed them to help families that historically lacked the access to these important nutrition assistance programs.

Methods

This online survey contained a series of closed- and open-ended items about summer meals program administration, including approval processes for summer meals sponsors, the number of sponsors approved and operating, methods for tracking and reporting sponsor activities, implementation of definitions for “access to congregate meal service” and “rural pocket,” program integrity, successes and challenges to implementation of summer non-congregate meal service in 2023 as well as recommendations for future summers. A total of 39 state agencies, representing 38 states, responded to the survey.¹



¹ States responding to the survey include: 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.

Number and Types of Sponsors and Sites Approved Across States in 2023

Most states implemented non-congregate meals to children in summer 2023. 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. The number of non-congregate meal sponsors ranged from 1 to 79 sponsors, with half of state agency respondents reporting 16 or fewer sponsors. Many states opted to approve a smaller number of sponsors for this first official year implementing permanent non-congregate meal service.

Thirty-one respondents reported having a total of 2,988 meal distribution sites, with three quarters reporting fewer than 89 sites in their state.

- Most states (84.4%) approved all eligible sponsors for non-congregate service.
- Nineteen states (59.4%) allowed sponsors new to summer meals (SFSP & SSO) to operate non-congregate meal service in summer 2023.
- Thirteen states (40.6%) did not allow new sponsors to operate non-congregate meal service.

Figure 1. Respondent States that Approved All Eligible Sponsors Wanting to Operate Non-Congregate Meal Service

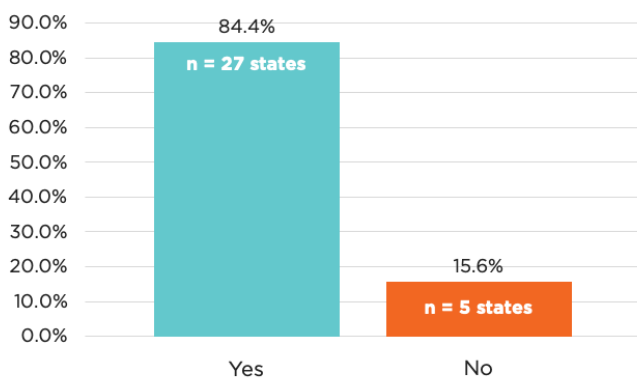
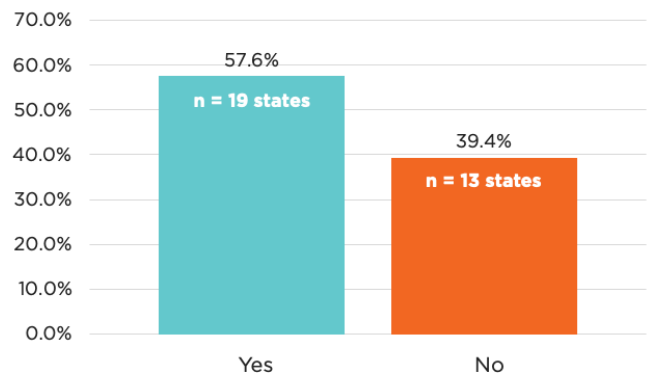


Figure 2. Respondent States Allowing Sponsors New to SFSP or SSO to Operate Non-Congregate

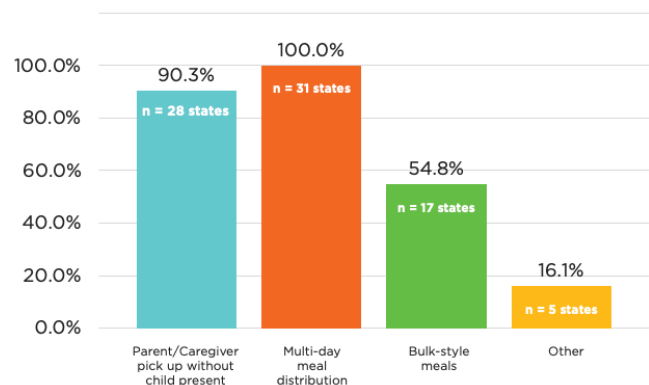


Meal Service Flexibilities

States were allowed to choose what types of non-congregate flexibilities sponsors could operate in Summer 2023. These options included multi-day meal distribution (providing meals for a certain number of days up to 10 days at a time), allowing parents to pick-up the meal(s) without having a child present, and bulk-style distribution (meals are provided in separate components that require some assembly and preparation by families).

Of the 31 states providing information on what meal distribution models and flexibilities were permitted, all allowed multi-day meal issuance, 28 (90.3%) allowed parents and caregivers to pick up meals without a child present, 17 (54.8%) allowed bulk-style distribution, and five (16.1%) allowed other distribution methods. Only six states (18.8%) reported having non-congregate meal operations served in non-area eligible locations.

Figure 3. Flexibilities Permitted Across Respondent States



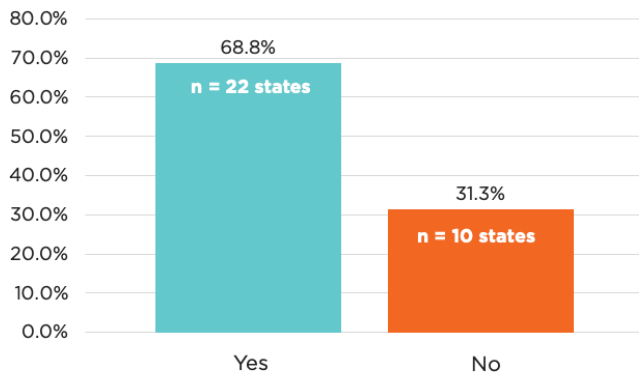
Rural Pockets

Many state agencies considered and approved non-congregate sites located in rural pockets outside of the [Summer Food Service Program Rural Designation map](#).

- 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](#)). Other popular data sources used to identify rural pockets included the [National Center for Education Statistics](#) (NCES) locale classifications.
- 22 respondent states (68.8%) considered and approved rural pockets.

Without a clear, singular definition of “access to a congregate meal site” from USDA, states implemented a wide range of definitions and processes in summer 2023. Many states determined access to congregate meal service geographically based on distance, school district boundaries, and city limits. Sponsor justification was another common method used to determine access to a congregate site. Many state agencies also considered road safety concerns, transportation issues, staffing concerns, and gaps in days of service for existing congregate sites.

Figure 4. Respondent States that Considered and Approved Rural Pockets



Successes

Overall, state agencies said that the new summer non-congregate meal service in rural areas allowed programs to reach more families that historically lacked access to meal site locations when school was out. Many felt that service model types (home delivery, mobile meals, and grab-and-go) and flexibilities (like providing parent/caregiver pick-up without child present, multi-day meal distribution, bulk-style meals) were needed to bring more meals to more kids during the summer.

Challenges

Most respondent state agencies specifically called out the lack of timely and accurate guidance on aspects of program administration and operation (an example would be the lack in guidance on defining a rural area lacking access to congregate meal service). Administering summer non-congregate meal service at the state agency level requires much coordination and accountability—state agencies noted that program management, sponsor selection and education, as well as processes like determining rural eligibility and modifying claims systems for tracking participation were particularly challenging in 2023. State agencies also mentioned the approval process for non-congregate delivery model types and flexibilities were also challenging and some did not allow certain model types and flexibilities.

State agencies experienced difficulties in receiving consistent data across sponsors, long wait times to receive sponsor data, and 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). State agencies explained that technology updates and upgrades to account for non-congregate summer meal service require more time to complete, and some indicated that those changes would not be completed for summer 2024.

The remaining challenges identified by state agencies were parent- and child participant-facing: ensuring food safety, a lack of variety in foods offered, limited participation, food waste,



scheduling meal pick-up, and ensuring children received provided meals. Delays in receiving information from USDA resulted in less time for preparing for non-congregate meal service in summer 2023, and staffing at state agencies was consistently limited across state agencies.

Conclusions

- 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, non-congregate 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 Interim Final Rule.

For more information, the [full report](#) provides details on data collection efforts and summarizes lessons learned from multiple stakeholder groups (i.e., sponsor, state agency, parent/caregiver, No Kid Hungry staff) during summer 2023. Also, the [State Agency Micro-Report](#) and [Sponsor Micro-Report](#) summarize the experiences of these respective stakeholders.