

# Welcome!

As you grab a seat, please ensure  
your table has a mix of State  
Agencies and Sponsors as well as  
varied state representation

# Summer Nutrition Summit

January 12-13, 2026



 **NO KID  
HUNGRY**

# Rural Non-Congregate Integrity Plans

Balancing Oversight and  
Operations

Summer Nutrition Summit 2026



## Session Leaders



**SKY BEARD**  
Director  
**No Kid Hungry Florida**



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Sr. Manager  
Center for Best Practices  
**No Kid Hungry**



# Agenda

- Share of Common Integrity Practices
- Feedback Gathering
- Group Scenario Discussions
- Share Out
- Reflection Time



# Goals

- Share in an **OPEN DISCUSSION** about the complexities of building and implementing integrity plans
- Share **CHALLENGES & SUCCESSES** experienced by state agencies and sponsors in maintaining program integrity
- Discuss the **IMPACT** of integrity measures on program operations and participant experience
- Develop a **SHARED UNDERSTANDING** of balancing oversight with practical program implementation



# NO KID HUNGRY RURAL NON-CONGREGATE SURVEY FINDINGS



# No Kid Hungry 2025 Survey Methodology

In summer 2025, State agencies administered and sponsors implemented the rural non-congregate (RNC) summer meal programs to expand access to nutritious meals for children who may not have been able to attend congregate sites.

Surveys were conducted to capture how State agencies administered and monitored the program, how sponsors operated the program and how both were able to identify successes and challenges, and inform future supports.

## Sponsor Survey Overview

**Respondents:** 589 sponsors across 45 states and DC

**Survey period:** August 25 to September 26, 2025

**Completion rate:** 51.5%

## State Agency Survey Overview

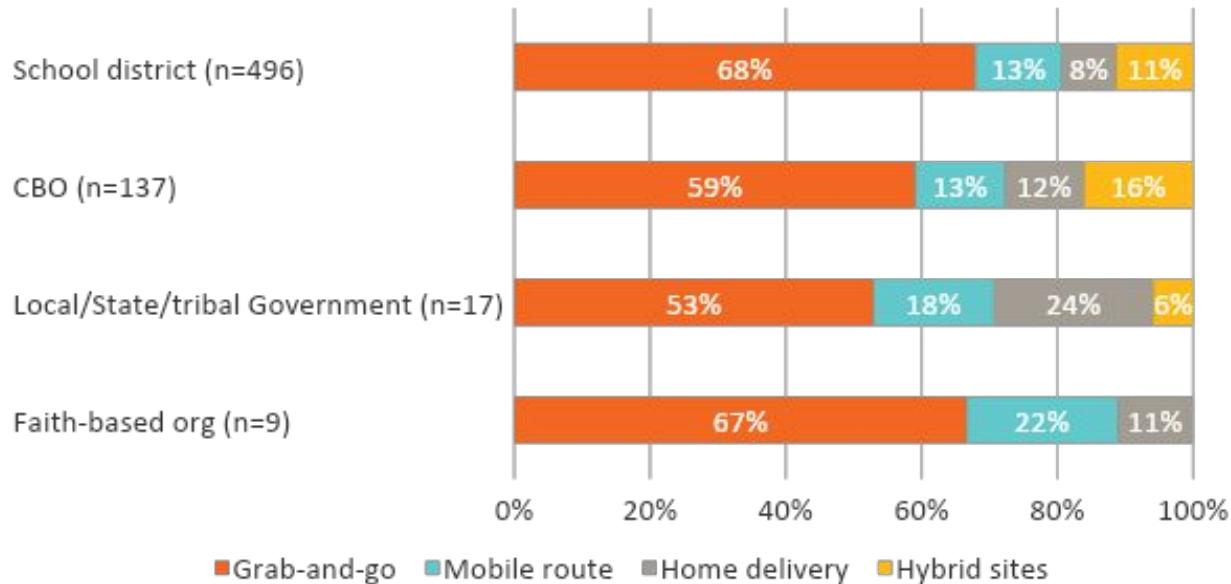
**Respondents:** 28 states

**Survey period:** August 25 to October 23, 2025

**Response rate:** 54%

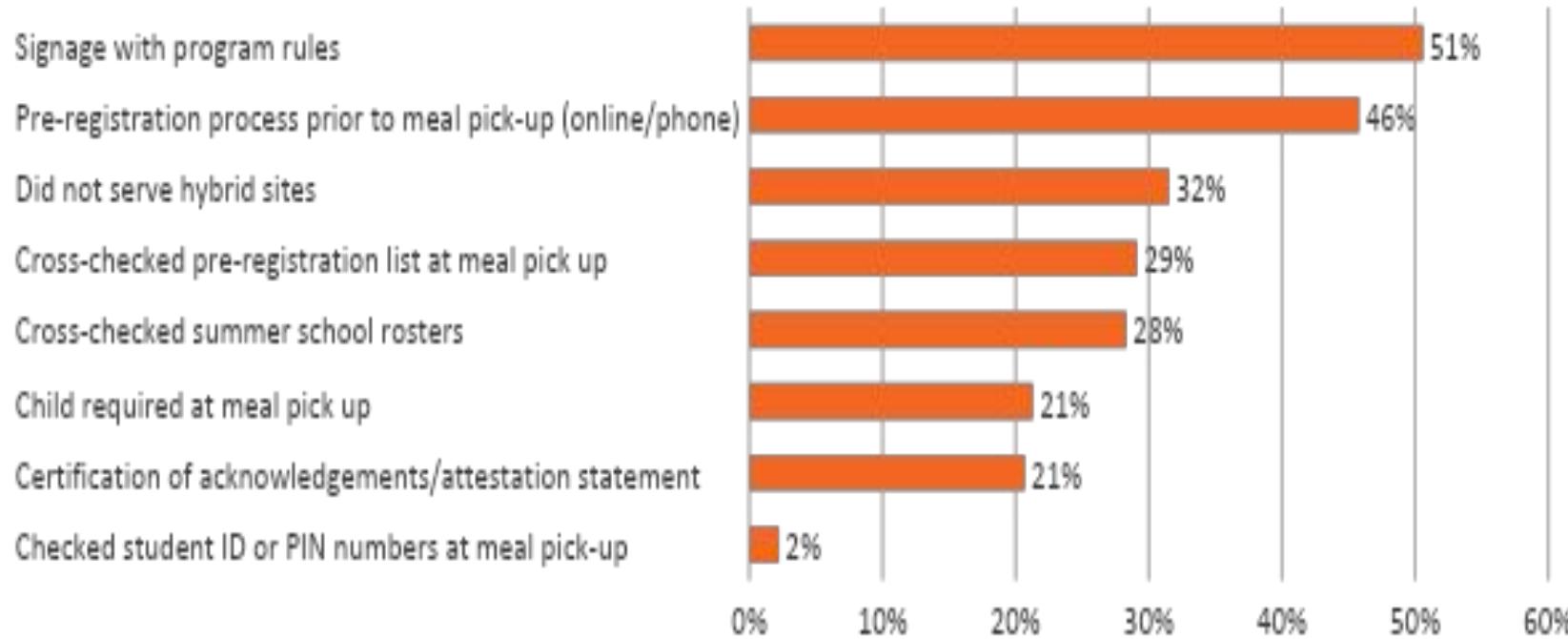
## Preliminary Findings: Distribution Models by Organization Type

Non-congregate Model Types by Organization Type



**Most sponsors used grab-and-go models across all organization types, while mobile, home-delivery, and hybrid sites were less common.**

## Preliminary Findings: Integrity Measures



## Preliminary Findings: Other Integrity Measures (Open end)

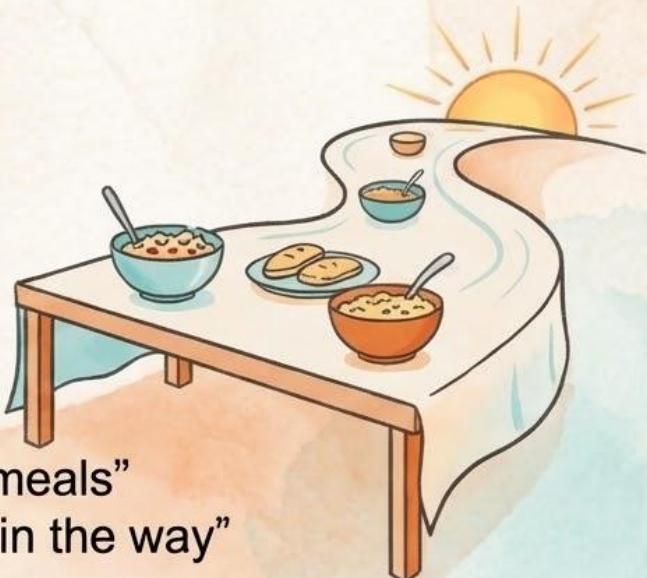
- Additional communication with families, such as including program details, food safety information, and eligibility rules on websites, printed materials, and newsletters.
- Several states recommended that sponsors align meal distribution days and times across sites, particularly where locations were close.
- Documentation and oversight, including attestation statements, non-congregate operations forms, or integrity plans outlining how duplication would be prevented and eligibility verified.
- Use of technology (e.g., QR codes, Google Forms, or shared spreadsheets) to track registrations and monitor meal distribution in real time across multiple sites.
- Verification enhancements, such as confirming child presence during initial pick-up or allowing parent/guardian authorization forms for meal collection.
- A few states also implemented pre-operational visits or required sponsors to be in good standing for at least one year before participating.

## Where Do You Land?

- “No one slips through the cracks”
- “No duplicate meals, ever”
- “Accountability is **EVERYTHING**”



- “Just feed the kids, that’s all that matters”
- “It will all work out in the end, just serve the meals”
- “Our community needs us, the rules just get in the way”





## What is your approach to designing and enforcing an Integrity Plan?

Multiple Choice Poll

103 votes

103 participants

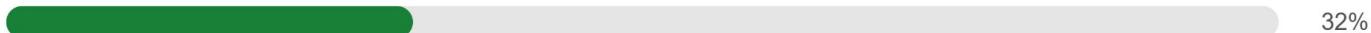
Reaching as many kids as possible is our #1 priority. Worrying about duplicate meals is secondary. - 12 votes



I would rather feed a few more kids if it means some duplicate meals end up getting served - 42 votes



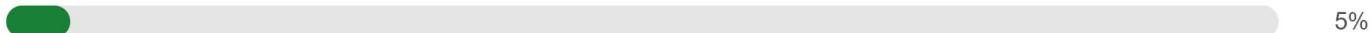
I'm completely on the fence and try to balance both - 33 votes



I'd rather fewer duplicate meals are served even if it reduces access for some kids - 11 votes



No duplicate meals EVER will get through on my watch. This is the #1 priority. - 5 votes





Who holds the greatest responsibility for preventing duplicate meals from being served at a RNC site? (Rank options from most to least responsible)

Ranking Poll  104 votes 104 participants

1. USDA- (via national standards)

.



2. State Agency- (via oversight and restrictions)



3. Sponsor- (via program design and implementation)



4. Caregivers/community members- (via honor system and following directions)



# Table Discussions: Integrity Plan Scenarios



## Table Props



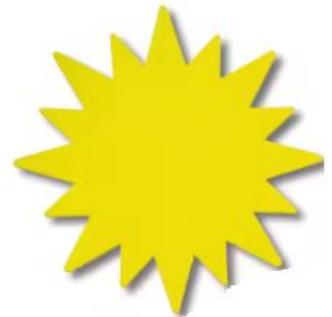
Participant



State Agency



Sponsor



Bright Ideas

## Shared Agreements

- Participate with **OPENNESS** for new ideas and concepts
- **CONSIDER** points of view that are not part of your daily experience.
- If you have a point of view that has not been expressed, **SHARE** so others can learn.
- If you find yourself doing more speaking, take a step back to **LISTEN** more to others.
- Work to create solutions that positively impact **ALL** stakeholders
- Take a **NEW LENS** with you that will help you in your program implementation moving forward.

## **Disclaimer**

Certain program models and implementation methods shared in today's discussions may be restricted in some states. Check with your local state agency before implementing any new meal service models or implementation methods.

# Parents and Caregivers Joining Today's Discussion



Name  
Title



Name  
Title



Name  
Title



Name  
Title

## Table Discussion #1

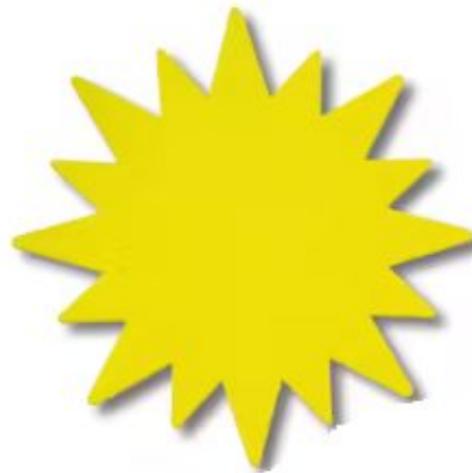
SCENARIO: As a **SPONSOR**, your non-congregate summer meal program is planned, approved and ready.

Your State Agency administrative review however, finds your approved plan doesn't match onsite implementation.

**Discuss some potential reasons this situation may occur and how this inconsistency affects state agencies, sponsors, and participants.**

**What are some IDEAS for better streamlining the communication of integrity plans?**

# What's Your **BRIGHT** Idea?



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# IDEAS from YOU: Integrity Plan Communications

- Live document sponsor can use make changes to integrity plans which communicates with State Agency
- Integrity plan document required to be posted onsite during service
- Regular 1:1 check in calls with sponsor and state agency to walk through process
- Integrity plan training not just needed for “designated” person at sponsor level, but for everyone working at the site

## Discussion #2

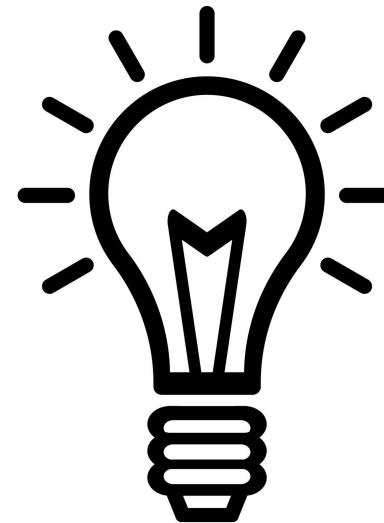
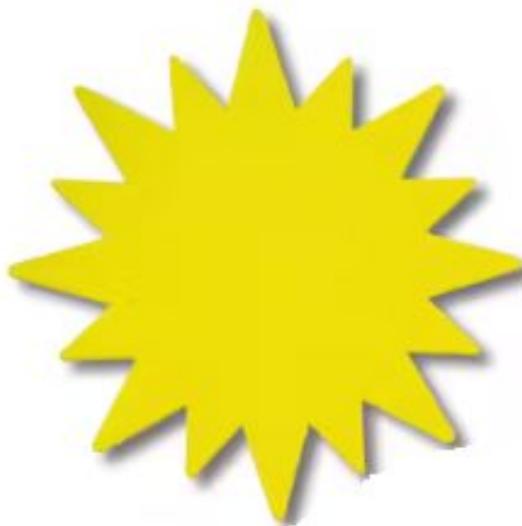
SCENARIO: You are a single **parent**, working full-time Mon-Fri, from 8:30 am – 5:30 pm and have a 30 minute commute. You have an 8 and 10 year old who stay home with a family friend over the summer, and a 16 year old who has a summer job with frequently changing hours.

The only rural non-congregate meal program near you offers drive through meal pick up on Wednesdays from 10:30 am – 12:00 pm. Children are required to be present at pick-up, and you are unaware of any alternative parent/caregiver pick-up options.

**Consider how state agencies, sponsors, and participants are impacted by this program model. How does this integrity plan help some and hinder others? What options does the parent have to participate?**

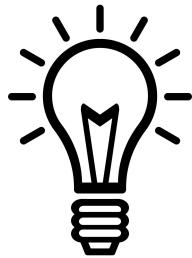
**What program flexibilities could make it easier for the children to receive meals?**

# What's Your **BRIGHT** Idea?



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## **IDEAS from YOU: Building Family Friendly Integrity Plans**

- Utilize flexibility of parent/guardian pick-up
- For Schools: Coordinating w/ school emergency card lists for alternative caregivers.
- Provide an alternative caregiver “permission slip”
- Consider early morning or late afternoon meal service times for working parents.

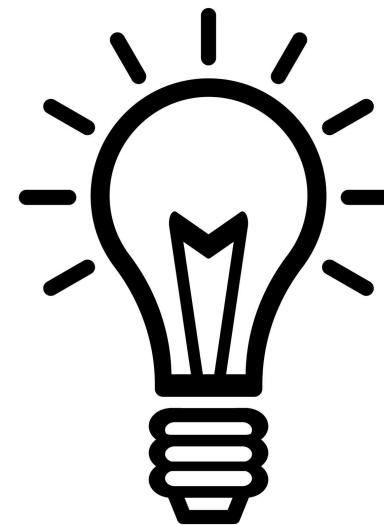
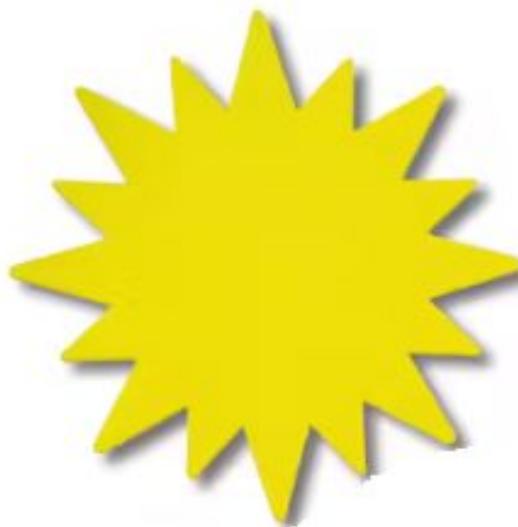
## Discussion #3

As the **state agency**, you see rural non-congregate applications that are varied in program model and integrity plans. You serve diverse communities and must find the right balance between regulatory responsibilities (accountability) and offering flexibilities for:

- Very Small vs. Large Communities
- School District vs. Community Organization
- Experienced vs. New Sponsor

**Consider how state agencies, sponsors, and participants are impacted by integrity measures in each of these situations/sponsor types**

# What's Your **BRIGHT** Idea?



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## **IDEAS from YOU: Striking a Balance in Site Regulations**

- Low volume service/very rural: staff knowledge of community sufficient
- High volume service: Pre-registration and bar codes
- Partnerships for CBOs and school districts to leverage strengths and support weak points.
- Increase flexibilities for experienced sponsors or with record of successful ARs

# Reflection



What is a point of view you learned about today that you had not previously considered?

Has your own personal beliefs about how integrity plans and oversight in RNC programs been challenged or strengthened?



**THANK YOU!**

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