



May 2018

SUMMER MEALS

Actions Needed to Improve Participation Estimates and Address Program Challenges

GAO Highlights

Highlights of [GAO-18-369](#), a report to congressional requesters

Why GAO Did This Study

The SFSP, a federal nutrition assistance program, is intended to provide food to children in low-income areas during periods when area schools are closed for vacation. In the last decade, federal expenditures for SFSP have increased as the program has expanded, according to USDA data. GAO was asked to review the SFSP.

This report examines (1) what is known about SFSP participation, (2) other programs that help feed low-income children over the summer, and (3) challenges, if any, in providing summer meals to children and the extent to which USDA provides assistance to address these challenges. GAO reviewed relevant federal laws, regulations, and guidance; analyzed USDA's SFSP data for fiscal years 2007 through 2016; surveyed state agencies responsible for administering the SFSP in 50 states and the District of Columbia; visited a nongeneralizable group of 3 states and 30 meal sites, selected based on Census data on child poverty rates and urban and rural locations; analyzed meal site data from the 3 states; and interviewed USDA, state and national organization officials, and SFSP providers, including sponsors and site operators.

What GAO Recommends

GAO is making four recommendations, including that USDA improve estimates of children's participation in SFSP and communicate the circumstances it considers when granting flexibilities to ensure safe meal delivery. USDA generally agreed with GAO's recommendations.

View [GAO-18-369](#). For more information, contact Kathryn A. Larin at (202) 512-7215 or larink@gao.gov.

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What GAO Found

Nationwide, the total number of meals served to children in low-income areas through the Summer Food Service Program (SFSP) increased from 113 to 149 million (about 32 percent) from fiscal year 2007 through 2016. The U.S. Department of Agriculture (USDA) directs states to use the number of meals served, along with other data, to estimate the number of children participating in the SFSP. However, participation estimates have been calculated inconsistently from state to state and year to year. In 2017, USDA took steps to improve the consistency of participation estimates, noting they are critical for informing program implementation and strategic planning. However, GAO determined that the method USDA directs states to use will continue to provide unreliable estimates of participation, hindering USDA's ability to use them for these purposes.

Children eating breakfast and playing ball at summer meal sites



Source: GAO. | GAO-18-369

Other federal and nonfederal programs help feed low-income children over the summer to some extent, according to states GAO surveyed and SFSP providers and others GAO interviewed. For example, in July 2016, USDA data indicate about 26 million meals were served through a separate federal program that allows school meal providers to serve summer meals. Some children also received summer meals through nonfederal programs operated by faith-based organizations and foodbanks, though GAO's state survey and interviews with providers and national organizations indicate the reach of such efforts is limited.

States and SFSP providers reported challenges with meal sites, participation, and program administration; USDA has taken steps to address these areas. Specifically, in GAO's survey, a majority of states reported challenges with availability and awareness of meal sites, as well as limited program participation and administrative capacity. National, state, and local officials have taken steps to address these issues, such as increasing outreach and offering activities to attract participation. In addition, 17 states in GAO's survey and providers in the states GAO visited reported a challenge with ensuring meal sites are in safe locations. To address this safety issue, USDA has granted some states and sponsors flexibility from the requirement that children consume meals on-site. However, USDA has not broadly communicated the circumstances it considers when granting this flexibility. Further, some states and sponsors that have requested this flexibility reported difficulty obtaining data to show these circumstances exist, hampering their ability to ensure safe meal delivery.

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Abbreviations

ADA	average daily attendance
CACFP	Child and Adult Care Food Program
EBT	Electronic Benefits Transfer
eSFSP	Enhanced Summer Food Service Program
FNS	Food and Nutrition Service
NSLP	National School Lunch Program
SBP	School Breakfast Program
SFSP	Summer Food Service Program
SNAP	Supplemental Nutrition Assistance Program
Summer EBT	Summer Electronic Benefit Transfer for Children
USDA	U.S. Department of Agriculture
WIC	Special Supplemental Nutrition Program for Women, Infants, and Children

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May 31, 2018

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
House of Representatives

The Honorable Todd Rokita
Chairman
Subcommittee on Early Childhood, Elementary and Secondary Education
House of Representatives

In fiscal year 2016, the U.S. Department of Agriculture (USDA) spent \$478 million to provide more than 150 million meals to children through the Summer Food Service Program (SFSP). As a federal nutrition assistance program, the primary purpose of the SFSP is to provide food service to children in low-income areas during periods when area schools are closed for vacation. USDA's Food and Nutrition Service (FNS) oversees the SFSP, which is administered by the states and operated by a variety of public and private nonprofit organizations and government entities that sponsor meals at sites such as schools, camps, parks, churches, and libraries. In the last decade, federal expenditures have increased as the program has expanded, according to FNS data. As Congress considers proposals intended to modify child nutrition programs, you asked that we examine issues related to the SFSP.

This report assesses:

1. What is known about participation in the Summer Food Service Program and how it has changed in the last 10 years?
2. What other programs help feed low-income children over the summer?
3. What challenges exist, if any, in providing summer meals to children, and to what extent does FNS provide assistance to states and sponsors to address these challenges?

To address our first objective about participation in the SFSP, we analyzed FNS's national data on SFSP meals served for fiscal years 2007 through 2016. For context on these trends, we analyzed, and compared to the SFSP data, FNS's data on lunches served through the

National School Lunch Program (NSLP), the largest child nutrition assistance program, for the same time period. To assess the reliability of SFSP and NSLP data, we (1) performed electronic testing of relevant data elements, (2) reviewed existing information about the data and the system that produced them, and (3) interviewed agency officials knowledgeable about the data. We determined that these data were sufficiently reliable to identify the number of meals served in each program and assess change over time.

We also reviewed FNS's method for estimating the number of children participating in the SFSP using these data and discuss the reliability of this method in the body of the report. From our three selected states, we also analyzed site-level data on meals served and days of operation for 2 months during the summer of 2016, including the month with the largest number of SFSP meals served in each state. We assessed the reliability of these data by (1) performing electronic testing of relevant data elements, (2) reviewing existing information about the data and the system that produced them, and (3) interviewing agency officials knowledgeable about the data. We determined these data to be sufficiently reliable for the purposes of this report.

To obtain information specific to our second objective on other programs that help feed children in the summer, we also analyzed FNS data on meals served through the NSLP and School Breakfast Program (SBP) in July 2016 because FNS used these data to estimate meals served through the Seamless Summer Option in summer 2016.¹ To assess the reliability of these data, we (1) performed electronic testing of relevant data elements, (2) reviewed existing information about the data and the system that produced them, and (3) interviewed agency officials knowledgeable about the data. We determined that these data were sufficiently reliable to describe the number of meals served through the Seamless Summer Option.

In addition, we relied on several methods to address all three objectives. At the federal level, we reviewed relevant federal laws, regulations, and

¹States report monthly to FNS the number of meals served through the NSLP and SBP using the FNS-10 form. The information reported for the NSLP and SBP includes the number of paid, free, and reduced-price meals by meal type (e.g., lunches and breakfasts) for each month. FNS's estimate of the number of meals served through the Seamless Summer Option over the summer includes free and reduced-price lunches and snacks served through the NSLP and free and reduced-price breakfasts served through the SBP in July in all states.

guidance, and interviewed FNS officials in headquarters and its seven regional offices. We also surveyed the state agencies responsible for administering the SFSP in the 50 states and District of Columbia. We administered our web-based survey between August and October 2017 and received a 100 percent response rate. Further, we visited three selected states—Arizona, Illinois, and Massachusetts—between June and July 2017. In each state, we interviewed state agency officials responsible for administering the SFSP, as well as selected SFSP providers, and we observed SFSP meal service at a total of 30 meal sites.² We selected states and local areas within those states based on a high proportion of children in poverty, a mix of urban and rural densities, a mix of sponsor and site types, and diverse locations in the country. We visited a wide variety of site locations including, but not limited to, schools, parks, community recreation areas, and libraries. To gather additional information, we interviewed a broad range of regional and national organizations involved in the SFSP, such as the Boys and Girls Club of America, Catholic Charities, and Feeding America. Additional information on the report’s scope and methodology is included in appendix I.

We conducted this work from January 2017 through May 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Created in 1968, the SFSP is authorized under the Richard B. Russell National School Lunch Act and generally provides free meals to children age 18 and under in low-income areas during certain periods when school is not in session.³ Specifically, the SFSP operates during school summer vacation periods between May through September, vacation periods in any month for programs operating on a continuous school

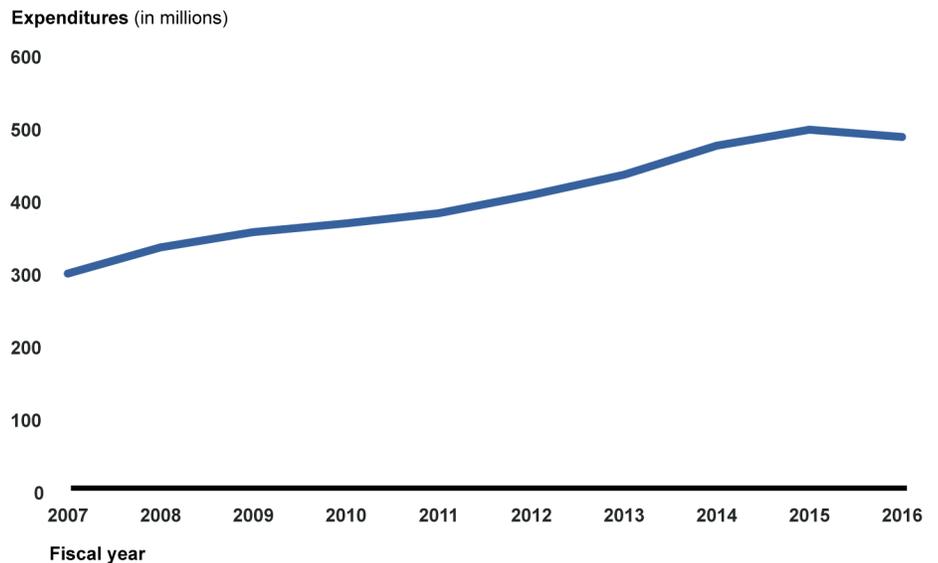
²Throughout our report, references to “SFSP providers” include both sponsors of SFSP sites and meal site operators, if different from the sponsor.

³Codified as amended at 42 U.S.C. § 1761. Eligible children also include individuals over age 18 who are determined by a state educational agency or a local public educational agency of a state to have a disability, and who are participating in a public or nonprofit private school program established for individuals who have a disability.

calendar, and certain other times for areas affected by an unanticipated school closure, such as for a natural disaster. However, the majority of SFSP meals are served to children during the summer months.

In fiscal years 2007 through 2016, federal expenditures on SFSP increased, according to FNS data, though there was a slight decrease between fiscal years 2015 and 2016 (see fig. 1).⁴

Figure 1: Summer Food Service Program Federal Expenditures, Fiscal Years 2007 through 2016



Source: GAO analysis of Food and Nutrition Service data. | GAO-18-369

Note: This figure includes federal expenditures such as cash payments for meals served; state and sponsor administrative costs; and health inspection costs.

SFSP Program Administration

The SFSP is administered at the federal level by FNS through its national and regional offices. FNS is responsible for issuing regulations,⁵ instructions, and guidance; reviewing states' program management and administration plans; overseeing program administration; and reimbursing

⁴As of April 2018, preliminary fiscal year 2017 expenditures totaled \$483 million dollars, which are similar to fiscal year 2016 expenditures.

⁵The SFSP program regulations are found at 7 C.F.R. pt. 225.

states for meals served that meet program requirements.⁶ At the state level, the program is administered by state agencies and locally operated by state-approved sponsors, such as school districts, local government entities, or private nonprofit organizations.⁷ State agencies are responsible for approving, providing training to, and inspecting and monitoring sponsors and meal sites. Sponsors, in turn, are responsible for monitoring their SFSP meal sites, managing the meal service, and providing training to administrative staff and site operators. A sponsor may operate one site or multiple sites.⁸ Sites are physical locations in the community where children receive and consume meals in a supervised setting. According to FNS guidance, sites may be located in a variety of settings, including schools, parks, community centers, health clinics, hospitals, apartment complexes, churches, and migrant camps.

SFSP Program Requirements

States may approve different types of SFSP meal sites, including open sites, closed enrolled sites, and camps. Open sites operate in an area where at least half of the children are eligible for free or reduced-price school meals (referred to as “area eligible”), according to data from entities such as schools or the U.S. Census Bureau. Children are generally eligible for free or reduced-price school meals if their households have incomes at or below 185 percent of federal poverty guidelines.⁹ At open sites, meals are made available to all children in the

⁶States, in turn, provide funds to sponsors. Federal funding is also provided for certain SFSP administrative and operating costs.

⁷The type of state agency responsible for administering the SFSP depends on the state and could include the state educational, health, social services, or agriculture agency. Depending on the state, the state agency administering the SFSP may or may not be the same agency that oversees other child nutrition programs.

⁸In our report, we use the term “sponsor” when referring to entities operating SFSP sites. A sponsor may be approved to operate a maximum of 200 sites and serve a maximum total average daily attendance of 50,000 children. Exceptions to these limits may be approved by the state agency if the sponsor can demonstrate that it has the capability to manage a larger program.

⁹The federal poverty guidelines are derived from the poverty thresholds that the Census Bureau uses to prepare its estimates of the number of individuals and families in poverty, based on household size and income. The guidelines are updated annually by the Department of Health and Human Services, adjusting for inflation, and are used to determine eligibility for certain federal programs and benefits. Using the federal poverty guidelines, FNS annually publishes income eligibility guidelines for determining eligibility for free and reduced price meals. For July 1, 2017 through June 30, 2018, 185 percent of the federal poverty guidelines for a family of four in the contiguous 48 states and D.C. was an annual income of \$45,510. See Child Nutrition Programs: Income Eligibility Guidelines, 82 Fed. Reg. 17,182 (Apr. 10, 2017).

area, and all meals served that meet program requirements are reimbursable. Closed enrolled sites, on the other hand, are open only to enrolled children, as opposed to the community at large. At closed enrolled sites, meals served to all children in attendance are reimbursable as long as at least half of the enrolled children are eligible for free or reduced-price school lunch.¹⁰ Unlike other types of sites, camps are reimbursed only for meals served to children who have been individually determined to be eligible for free or reduced-price school meals.

SFSP meals must meet certain requirements in order to be eligible for federal reimbursement; for example, the meals must be served and consumed on-site at an approved site.¹¹ Federal reimbursements for summer meals are provided for each breakfast, lunch, supper, or snack served to an eligible child at an eligible site that also meets federal requirements for menu components, scheduled meal times, and nutrition.¹² For example, to meet nutritional requirements, a lunch or a supper must, at a minimum, include four components: 2 ounces of meat or a comparable serving of a meat alternate, 3/4 cup of fruits and/or vegetables (at least two kinds), a slice of bread or a comparable serving of another grain, and a cup of milk.¹³ In 2017, the federal reimbursement rate was \$3.83 or \$3.77 for each eligible SFSP lunch or supper served, depending on the type of meal site.¹⁴ Each site may serve up to two

¹⁰Eligibility for closed enrolled sites may be determined through applications completed by household members on behalf of the child enrolled or other sources of information that can be used to determine site eligibility, such as school or census data.

¹¹Specifically, program regulations require sponsors to maintain children on site while meals are consumed. 7 C.F.R. § 225.6(e)(15). This requirement, sometimes referred to as the “congregate meal requirement,” is referred to as the “on-site requirement” throughout the report. In general, only meals served to children may be claimed as reimbursable meals. However, in certain circumstances, meals served to adults may be counted as operating costs.

¹²See 7 C.F.R. § 225.16.

¹³In comparison, lunches served in the NSLP must include five components – meat or meat alternate, fruits, vegetables, grains, and milk. NSLP lunches must also meet additional requirements, such as calorie maximums that vary by student grade groups, which SFSP lunches do not have to meet.

¹⁴Specifically, in 2017, the lunch or supper reimbursement rate for rural sites and those sites that prepare the meals themselves was \$3.83 and \$3.77 per meal for all other types of meal sites in all states except for Alaska and Hawaii. The reimbursement rates for breakfast were \$2.19 and \$2.15 per meal, and for snacks were \$0.91 and \$0.89 per meal. Reimbursement rates are annually adjusted.

meals or one meal and one snack per day.¹⁵

Some flexibilities are available to FNS in implementing the SFSP program, under its waiver and demonstration authorities. Specifically, the National School Lunch Act authorizes the Secretary of Agriculture to waive, upon request of a state or eligible service provider, certain program requirements established under the National School Lunch Act or the Child Nutrition Act of 1966, as amended, including some for the SFSP.¹⁶ In order to grant a waiver request, the Secretary must determine that the waiver would facilitate the state or service provider's ability to carry out the purpose of the program, and that the waiver will not increase the overall cost of the program to the federal government, among other things.¹⁷ In the event a waiver request is submitted, the Secretary is required to act promptly and state in writing whether the waiver request is granted or denied, and why. The Secretary is also required to periodically review the performance of waiver recipients, and submit an annual report to Congress summarizing the use of waivers and their effectiveness, among other details.¹⁸

In addition to this waiver authority, the Secretary is also authorized to carry out demonstration projects to develop and test methods of providing access to summer meals for low-income children in urban and rural areas, to reduce or eliminate the food insecurity and hunger of low-

¹⁵However, sites generally cannot serve both lunch and supper on the same day. Some exceptions apply: for example, camps and sites that primarily serve children from migrant families may be approved to serve up to three meals or two meals and one snack each day.

¹⁶42 U.S.C. § 1760(l). Eligible service providers include SFSP sponsors. This waiver authority is subject to specified exceptions; for example, the Secretary may not grant waivers that relate to the nutritional content of meals served or federal reimbursement rates, among other things.

¹⁷The statute requires waiver applications to describe 1) the statutory or regulatory requirements that are requested to be waived; 2) in the case of a state, the actions, if any, that the state has undertaken to remove state statutory or regulatory barriers; 3) the goal of the waiver to improve services under the program and expected outcomes; and 4) the impediments to the efficient operation and administration of the program.

¹⁸Specifically, the Secretary is required to annually submit to the Committee on Education and Labor of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate a report that summarizes the use of waivers by the state and eligible service providers; describes whether the waivers resulted in improved services to children; describes the impact of the waivers on providing nutritional meals to participants; and describes how the waivers reduced the quantity of paperwork necessary to administer the program.

income children and improve their nutritional status.¹⁹ The Secretary is required to provide for an independent evaluation of the demonstration projects carried out under this authority, and submit an annual report to Congress on the status of each project and the results of the evaluations.²⁰

¹⁹This demonstration authority was first established and funded by the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010, Pub. L. No. 111-80, § 749(g), 123 Stat. 2090, 2132-33. Subsequent appropriations acts continued to fund these demonstrations, most recently the Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, div. A, tit. IV, 132 Stat. 348.

²⁰Specifically, each December 31, the Secretary is required to submit a report to the Committee on Education and Labor of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate a report that includes the status of each demonstration project and the results of the evaluations for the previous fiscal year. Further, not later than 120 days after the completion of the last evaluation, the Secretary is required to submit a report to the same committees that includes recommendations to improve children's access to food during the summer months when school is not in regular session.

Number of SFSP Meals Served Has Generally Increased since 2007, but Estimates of Children Participating in the SFSP Are Unreliable

Number of SFSP Meals Served Has Increased by 32 Percent since Fiscal Year 2007

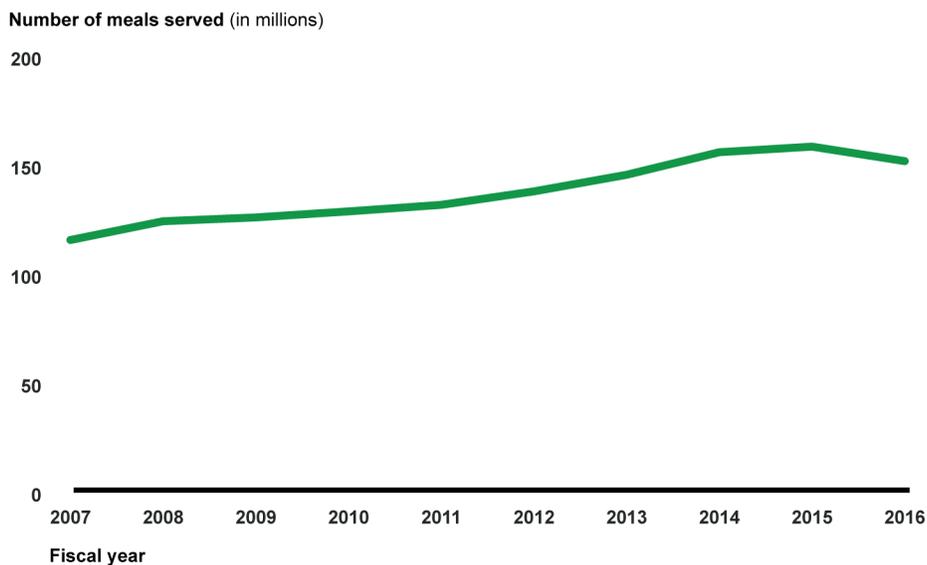
The total number of SFSP meals served nationwide during the summer—one indicator of program participation—increased from 113 million meals in fiscal year 2007 to 149 million meals in fiscal year 2016, or by 32 percent, according to our analysis of FNS data.²¹ The number of SFSP meals served has generally increased from year to year over this 10-year period. Most recently, meals decreased by 6 percent from 156 million meals in summer 2015 to 149 million meals in summer 2016, according to our analysis of FNS data (see fig. 2).²² Factors that may have affected year-to-year fluctuations include changes in funding for summer programs, sponsor participation, weather, and the number of weekdays available for sites to serve meals within a given summer, according to FNS and state agency officials we interviewed. For example, state agency officials in one of the three selected states we visited said they believe that reductions in state and local funding for summer programs that also provide meals, and turnover of sponsors, including losing one of

²¹Unless otherwise noted, this report focuses on SFSP meals served during the summer months, which we define to include May, June, July, and August, and nationwide refers to the 50 states and the District of Columbia. The SFSP operates during school vacation from May through September, during vacation periods in any month for programs operating on continuous school calendars, and during certain other times for areas affected by unanticipated school closure, such as for a natural disaster. While meals are served under the SFSP throughout the year, the majority of meals are served to children during the summer months. For example, in fiscal year 2016, meals served during summer months accounted for more than 99 percent of all SFSP meals. In addition, our review focused on fiscal year 2007 through fiscal year 2016, and included all meals served: breakfast, lunch, supper, and snack.

²²As of April 2018, preliminary data for fiscal year 2017 indicate 148 million SFSP meals were served in the summer months, continuing the decrease from fiscal year 2015.

the state's largest sponsors in a recent summer, affected the total number of SFSP meals served in their state in 2016.

Figure 2: Number of Summer Food Service Program (SFSP) Meals Served Nationwide during the Summer, Fiscal Years 2007 through 2016



Source: GAO analysis of Food and Nutrition Service data. | GAO-18-369

Note: SFSP meals served include breakfast, lunch, supper, and snack. This figure includes meals served in the 50 states and District of Columbia during May, June, July, and August.

According to our analysis of FNS data, SFSP lunches served in the summer months increased by over 17 million from fiscal year 2007 through fiscal year 2016, accounting for almost half of the total increase in the number of SFSP meals served in that period.²³ However, when comparing across each of the meal types, supper and breakfast had the largest percentage increases over the 10-year period, 50 and 48 percent, respectively (see table 1).²⁴ In comparison, the number of SFSP lunches served increased by 26 percent from fiscal years 2007 through fiscal year 2016.

²³Our analyses of SFSP meals in this report include SFSP meals served during the summer months—which we define to include May, June, July, and August.

²⁴When looking at the overall decline in SFSP meals served from fiscal year 2015 to fiscal year 2016, snacks had the largest percentage decrease at 9 percent, or 1.4 million meals, while breakfast, lunch, and supper each declined by between 2 and 4 percent.

Table 1: Change in Number of Meals Served Nationwide in the Food and Nutrition Service’s Summer Food Service Program (SFSP) by Meal Type, Fiscal Years 2007 and 2016

Fiscal year	Number of SFSP Meals Served by Meal Service Type				
	Breakfast	Lunch	Supper	Snack	Total
2007	28,512,170	68,085,416	4,166,516	12,210,737	112,974,839
2016	42,329,229	85,708,601	6,254,579	14,868,097	149,160,506
Increase in number of meals served	13,817,059	17,623,185	2,088,063	2,657,360	36,185,667
Percent increase	48%	26%	50%	22%	n/a

Legend: n/a = not applicable

Source: GAO analysis of data provided by the Food and Nutrition Service. | GAO-18-369

Note: SFSP meals served include breakfast, lunch, supper, and snack. This figure includes meals served in the 50 states and District of Columbia during May, June, July, and August. Our review focused on changes in the 10 years from fiscal year 2007 through fiscal year 2016.

From fiscal year 2007 through fiscal year 2016, there were increases in the numbers of meals served in both SFSP and NSLP, the largest child nutrition assistance program. Specifically, SFSP lunches served in July increased from 32 million to 40 million, or 24 percent, from fiscal year 2007 to 2016, and NSLP lunches served in March increased from 328 million to 376 million meals, or 15 percent, according to our analysis of FNS data.²⁵ Although the programs generally serve similar populations, different factors likely affected the number of meals served by each program, in part because NSLP serves children in schools during the school year and SFSP serves children in a variety of settings during the summer months.²⁶

²⁵We compared the month that each program served the most meals which, according to FNS officials, is July for SFSP and March for NSLP. As of April 2018, preliminary fiscal year 2017 data indicate that 403 million NSLP lunches were served in March and 39 million SFSP lunches were served in July, representing an increase in the number of NSLP lunches served, but a slight decline in the number of SFSP lunches served, compared to the prior year.

²⁶For more information on recent trends in the number of NSLP meals served see GAO, *School Nutrition: USDA Has Efforts Underway to Help Address Ongoing Challenges Implementing Changes in Nutrition Standards*, [GAO-15-656](#) (Washington, D.C.: Sept. 14, 2015) and GAO, *School Lunch: Implementing Nutritional Changes Was Challenging and Clarification of Oversight Requirements is Needed*, [GAO-14-104](#) (Washington, D.C.: Jan. 28, 2014).

Estimates of Children Participating in SFSP Have Been Calculated Inconsistently and Are Unreliable

Although states report the actual number of SFSP meals served to FNS, they *estimate* the number of children participating in SFSP, and information obtained from our state survey and FNS indicate that these participation estimates have been calculated inconsistently.²⁷ FNS instructs state agencies on how to calculate a statewide estimate of children's participation in the SFSP, referred to as average daily attendance (ADA), using sponsor-reported information on the number of meals served and days of operation in July of each year.²⁸ However, states' methods for calculating ADA have differed from state to state and from year to year, according to our review of states' survey responses and FNS documents. For example, although FNS directed states to include the number of meals served in each site's primary meal service—which may or may not be lunch—some states, according to our survey and FNS data, were calculating ADA using only meals served at lunch. FNS officials told us that these states were therefore not following the agency's instructions. Further, some states have changed their methods for calculating ADA over time—five states reported in our survey that the method they used to calculate ADA in fiscal year 2016 differed from the one they used previously.²⁹

While FNS clarified its instructions in May 2017 to help improve the consistency of states' ADA calculations moving forward, ADA remains an unreliable estimate of children's daily participation in SFSP for at least two reasons, according to our analysis. (See sidebar for the revised ADA calculation instructions.) First, ADA is based on summary data that does not account for existing variation in site days of operation, and second, it is based on July data, which does not reflect the month with the greatest number of meals served in every state.

²⁷For reimbursement purposes, states are required to report monthly data on the number of SFSP meals served. Once a year, FNS requires states to use these data to estimate program participation; however, this estimate is not used for reimbursement purposes.

²⁸States report this information to FNS on Form FNS-418: Report of the Summer Food Service Program for Children. Sponsors first report to states a total ADA across all their sites, which is calculated by dividing the number of meals served at each site's primary meal service by the number of days each site operated in July, the month FNS has determined most SFSP meals are served, according to FNS officials. States combine sponsor ADAs for a statewide ADA for July. FNS combines states' estimates to estimate children's participation in the SFSP nationwide.

²⁹Seven additional states reported that they were unsure if they had changed the method used to calculate ADA in fiscal year 2016.

Excerpt from Food and Nutrition Service's Revised Average Daily Attendance (ADA) Calculation Instructions for the Summer Food Service Program (SFSP)

"ADA is calculated by taking the total number of meals served in each site's primary meal service during the claim period and dividing that number by the number of operating or meal service days for the site during that claim period. A site's primary meal service is the meal at which the most meals are claimed. For most sites, this is typically lunch; however, if a site serves more meals at breakfast than at lunch, then breakfast would be considered the primary meal service. Once the ADA is calculated for each site, the sponsor will then add the ADAs for all sites that the sponsor manages. This will result in the ADA for the sponsor....Each site's primary meal service must be used in the Total ADA calculation for the sponsor [and then] this number should be added to the Total ADA for all other sponsors to get the cumulative ADA of Sponsors that is entered on this form."

Source: FNS Form 418. | GAO-18-369

- According to our analysis, ADA is an unreliable estimate of children's participation in SFSP because it currently does not account for existing variation in the number of days that each site serves meals to children. Specifically, because FNS's instructions indicate that sites' ADAs are to be combined to provide a statewide ADA estimate, differences in the number of days of meal service are disregarded. As a result, ADA does not reflect the average number of children served SFSP meals daily throughout the month. Our analysis of site-level data from one of the selected states illustrates this limitation. In this state, multiple sites reported an ADA of 60 for July, yet two of those sites served meals to children on only 1 day of the month and another site served meals to children on 20 days.³⁰ Although 120 children were served SFSP meals only 1 day in July across two of these sites, the combined ADA across all three sites, which we calculated following FNS's instructions, inaccurately suggests an average of 180 children were participating in SFSP at these sites on a daily basis in July.
- According to our analysis, ADA is also an unreliable estimate of children's participation in SFSP because it currently does not account for state variation in the month with the greatest number of SFSP meals served, potentially leading to an underestimate. According to FNS officials, the agency instructs states to calculate ADA for July because officials identified this as the month with the largest number of meals served nationwide. However, because of reasons such as state variations in school calendars, July is not the month with the largest number of meals served in every state. In one of the selected states, Arizona, using July to calculate ADA cuts the estimate almost in half.³¹ Specifically, we followed FNS's instructions and calculated that Arizona's ADA was 14,987 in July 2016 compared to 26,772 in June 2016. Nationwide, in summer 2016, 26 states served more SFSP meals in June or August than in July, according to our analysis of FNS data. However, without site level data on meals served and

³⁰According to officials from some national organizations involved in the SFSP, meal sites operating for 1 day may be one-time events. Such one-time or special events could include a summer kick-off event in the community to help promote awareness of the program.

³¹State agency officials and sponsors we spoke with in Arizona explained that schools typically end the academic year in May, with some schools returning to session in July and, therefore, June is the busiest month for SFSP in Arizona. On the other hand, officials in Illinois and Massachusetts told us that the SFSP usually serves the most meals in July because the academic year in those states typically ends in late June.

operating days, the extent to which these states had higher ADAs in June or August as compared to July is unknown.

In its May 2017 memo to states revising the ADA calculation instructions, FNS said that it is critical that the agency's means of estimating children's participation in the SFSP is as accurate as possible because it helps inform program implementation at the national level and facilitates strategic planning and outreach to areas with low participation.³² In addition, *Standards for Internal Control in the Federal Government* state that agencies should maintain quality data and process it into quality information that is shared with stakeholders to help achieve agency goals.³³

Although FNS has also collected information on other data that states collect on the SFSP, the agency has not yet used this information to help improve its estimate of children's participation in the program. In 2015, FNS published a Request for Information, asking whether states or sponsors collect any SFSP data that are not reported to FNS.³⁴ While FNS received responses from only 15 states, these responses suggest that some states collect additional data, such as site-level data that may allow for an improved estimate of children's SFSP participation, potentially addressing the issues we found in our analysis. In response to the information FNS received, they followed up with up to 9 of the 15 states in 2016 and 2017 to explore the feasibility of collecting additional data and improving estimates of children's participation. Although they took these steps, FNS officials told us they are cognizant of the burden on states and site operators that would be associated with additional

³²USDA, Food and Nutrition Service, *Revisions to Instructions for the Calculation for Average Daily Attendance on the Form FNS-418*, Memo code SFSP 09-2017 (Alexandria, VA: May 10, 2017).

³³GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

³⁴Request for Information: Summer Meal Programs Data Reporting Requirements, 80 Fed. Reg. 12,423 (Mar. 9, 2015). At that time, 5 of the 15 state agencies that responded indicated that they collected additional data beyond what is reported to FNS, according to FNS data collected through the Request for Information. In addition, 44 states reported in our survey that they collected SFSP site-level data beyond what is required by FNS. However, we did not collect information on the types of site-level data collected by states or how easily they could share such information with FNS.

reporting requirements.³⁵ At this time, the agency has not taken further action to improve the estimate, such as addressing the reliability issues caused by variation in the number of operating days of meal sites and in the months with the greatest number of meals served by state. As a result, FNS's understanding of children's participation in the SFSP remains limited, which impairs its ability to both inform program implementation and facilitate strategic planning and outreach to areas with low participation.

Other Federal and Nonfederal Programs Help Feed Low-Income Children over the Summer to Some Extent

Other Federal Programs Provide Meals and Nutrition Assistance Benefits over the Summer

Other federal programs that operate solely in the summer, as well as those operating year-round, help feed low-income children in the summer months. These programs include the NSLP Seamless Summer Option, which provides nutrition assistance benefits solely in the summer, and several federal programs that operate year-round.

In July 2016, in addition to the 70 million meals provided through the SFSP, 26 million meals were provided to low-income children through school food authorities participating in the NSLP's Seamless Summer

³⁵FNS officials indicated they are currently conducting a study related to child nutrition program reporting requirements, as required by the Consolidated Appropriations Act, 2017. The act provided funds for an independent study to identify the best means of consolidating and coordinating reporting requirements under child nutrition programs to eliminate redundancy, increase efficiency, and reduce the reporting burden on school food authorities and state agencies. Pub. L. No. 115-31, div. A, tit. I, 131 Stat. 135, 161. FNS officials said they expect the study to be completed in November 2018. They noted that some states expressed concerns in the ongoing study about the burden of child nutrition reporting requirements. Further, FNS officials noted that collection of additional information from states would require OMB approval under the Paperwork Reduction Act, and may also require regulatory changes.

Option, according to FNS data.³⁶ The Seamless Summer Option was established in 2004, and according to FNS, streamlines administrative requirements to encourage school food authorities providing free or reduced-price meals during the school year under the NSLP and SBP to continue providing meals to low-income children when school is not in session.³⁷ For example, officials from a national organization involved in summer meals told us the Seamless Summer Option makes it easier for school food authorities to provide summer meals because they continue working with the same state agency, reporting the same information to the state, and operating without having to transition to a separate program. Nonetheless, school food authorities can choose to provide free summer meals to children through either the SFSP or Seamless Summer Option,³⁸ and the majority of states (34) reported in our survey that a greater proportion of school food authorities participated in the SFSP than

³⁶These data include meals provided in the 50 states and the District of Columbia. FNS's estimate of the number of meals served through the Seamless Summer Option over the summer includes the number of free and reduced-price lunches and snacks served through the NSLP and free and reduced-price breakfasts served through the SBP in July in all states. School food authorities may continue providing free and reduced-price meals to children enrolled in accredited academic summer school programs through the NSLP and SBP. FNS officials told us they do not know how many summer meals are provided through the Seamless Summer Option, specifically because the Seamless Summer Option and NSLP meals are combined when reported by states for reimbursement purposes. Although FNS does not know the actual number of meals served through the Seamless Summer Option, agency officials told us they believe the number of summer meals provided through the NSLP is small relative to the number of meals served through the Seamless Summer Option during the summer months. They noted that their use of July NSLP data to estimate the number of Seamless Summer Option meals has several limitations, including that it overestimates the number of meals served through the program for July and underestimates the number of meals served through the program for the entire summer.

³⁷The Seamless Summer Option was established by the Child Nutrition and WIC Reauthorization Act of 2004, Pub. L. No. 108-265, § 116, 118 Stat. 729, 748 (codified at 42 U.S.C. § 1761(a)(8) and (b)(1)(D)).

³⁸As previously noted, school food authorities may continue providing free and reduced-price meals to children enrolled in accredited academic summer school programs through the NSLP and SBP. Under the National School Lunch Act, in general, children are eligible for free meals if their families have incomes at or below 130 percent of the federal poverty guidelines and reduced-price meals if their families have incomes between 130 and 185 percent of the federal poverty guidelines.

the Seamless Summer Option in summer 2016.³⁹ According to FNS and selected state officials, this may be related to the generally lower meal reimbursement rates school food authorities participating in the Seamless Summer Option receive compared to the rates received by those participating in the SFSP.⁴⁰

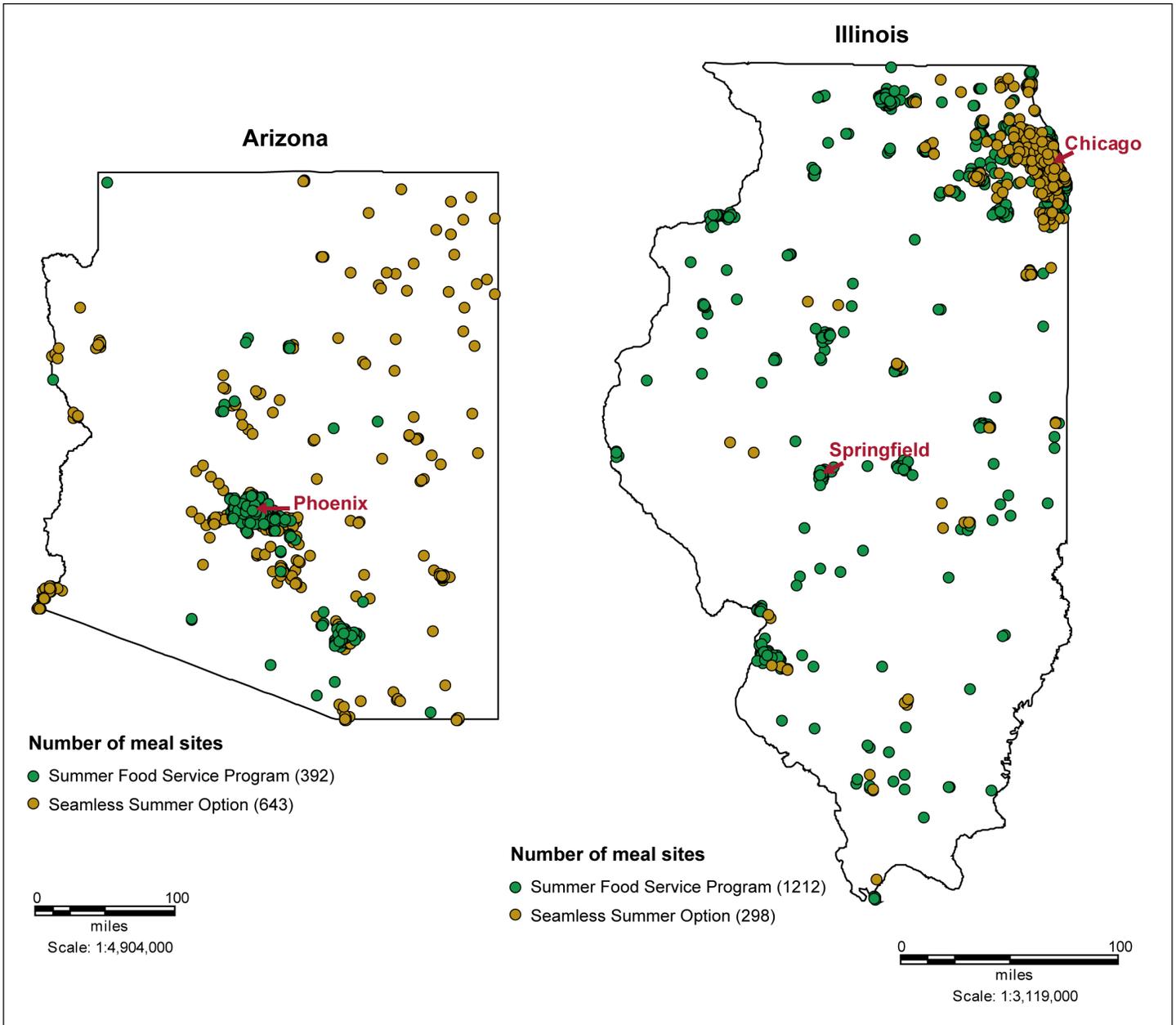
In summer 2016, the Seamless Summer Option added to the geographic availability of summer meal sites in two of the three states we visited as part of our review. School food authorities provided summer meals through the Seamless Summer Option in Arizona and Illinois, but not in Massachusetts, based on our analysis of data provided by these states. In Arizona and Illinois, school food authorities participating in the Seamless Summer Option added 643 and 298 summer meal sites, respectively, in the month with the largest number of SFSP meals served in each state (see fig. 3).⁴¹ In addition, some of the Seamless Summer Option sites in these two states provided meals to children in areas where there were no SFSP sites. For example, Seamless Summer Option sites provided meals in areas near the northeastern and southwestern corners of Arizona that lacked nearby SFSP sites.

³⁹Forty-one states responded to both our questions about school food authority participation in the Seamless Summer Option and SFSP, of which 34 reported greater school food authority participation in the SFSP, 3 reported greater school food authority participation in the Seamless Summer Option, and 4 reported equal school food authority participation in the SFSP and the Seamless Summer Option. According to FNS officials, the information it collects does not separate the number of school food authorities from the number of school sponsors participating in the SFSP. Additionally, the information FNS collects on the number of school food authorities participating in the NSLP and SBP does not separate out those school food authorities specifically participating in the Seamless Summer Option.

⁴⁰Meals served under the Seamless Summer Option are reimbursed at the free meal rates for the NSLP and SBP. Supper meals are reimbursed at the NSLP's free lunch rate. School food authorities that serve meals as sponsors under the SFSP generally receive slightly higher meal reimbursement rates than those operating the Seamless Summer Option. For example, school food authorities participating in the SFSP in the 48 contiguous states and D.C. were typically reimbursed \$3.69 per lunch served in summer 2016, and in the Seamless Summer Option, up to \$3.30 per lunch served before July and up to \$3.39 per lunch served beginning in July.

⁴¹The months with the largest number of SFSP meals served are June in Arizona and July in Illinois, according to Arizona and Illinois state officials. As noted earlier, state agency officials and sponsors we spoke with in Arizona explained that schools typically end the academic year in May, with some schools returning to session in July, and therefore, June is the busiest month for SFSP in Arizona. On the other hand, officials in Illinois explained that the SFSP usually serves the most meals in July because the academic year in that state typically ends in late June.

Figure 3: Seamless Summer Option and Summer Food Service Program (SFSP) Meal Sites in Arizona (June 2016) and in Illinois (July 2016)



Sources: GAO analysis of site level data provided by Arizona and Illinois state agency officials. MapInfo (map). | GAO-18-369

In addition to the SFSP and the Seamless Summer Option, the Summer Electronic Benefit Transfer for Children (Summer EBT) demonstration provided nutrition assistance benefits to 209,000 low-income children in summer 2016 in select areas across 6 states and 2 Indian Tribal Organizations, according to FNS officials.⁴² Since the summer of 2011, Summer EBT benefits have been provided to eligible households on an electronic benefits transfer card, which households use to purchase eligible foods at authorized retailers.⁴³ Specifically, the demonstration has provided monthly benefits of \$30 or \$60 per eligible child to households with children in areas with a perceived high level of need, based on the demonstration grantees' assessments of the percentage of children eligible for free or reduced-price school meals and the availability of the SFSP.⁴⁴ Consistent with this, three of the states that participated in Summer EBT in 2016 reported through our survey that these benefits helped children who were unable to access summer meals through the SFSP or the Seamless Summer Option. Further, according to an FNS-funded evaluation, Summer EBT improved food security among low-

⁴²According to FNS officials, eight grantees participated in the Summer EBT demonstrations in 2016: Cherokee Nation, Chickasaw Nation, Connecticut, Delaware, Michigan, Missouri, Nevada, and Oregon.

⁴³Summer EBT benefits have been provided to households through the existing electronic benefits transfer (EBT) systems for either the Supplemental Nutrition Assistance Program (SNAP) or the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). The demonstration benefits followed the general program rules of either SNAP or WIC, depending upon the model selected by each state or Indian Tribal Organization. In the sites using the SNAP EBT systems to deliver Summer EBT benefits, participants could redeem benefits for SNAP-eligible foods at any SNAP-authorized retailer in the nation; whereas, in the sites using the WIC EBT system to deliver these benefits, participants could redeem benefits only for a limited set of foods and only at WIC-authorized retailers.

⁴⁴As described earlier in this report, the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010, appropriated funds for USDA to develop and test methods of providing access to food for low-income children in urban and rural areas during the summer months when schools are not in regular session. Pub. L. No. 111-80, § 749(g), 123 Stat. 2090, 2132-33. Subsequent appropriations acts continued to fund these demonstrations, most recently the Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, div. A, tit. IV, 132 Stat. 348. FNS developed a multi-phased demonstration approach to test different strategies to improve program participation—both enhancements to the existing SFSP and new ways of providing nutrition assistance to children in the summer. The Summer EBT was one of the new approaches tested. According to FNS officials, the design of the Summer EBT demonstrations, including benefit amounts and the number of participating grantees and children, was determined by a number of factors, including research and evaluation needs, the capacity of the grantees that operate the demonstrations, and available funding. In summer 2017, seven states and two Indian Tribal Organizations participated in the Summer EBT demonstration, according to FNS officials.

income children who participated in the demonstration. Specifically, the evaluation found the receipt of these benefits reduced the number of children in the demonstration experiencing very low food security between 2011 and 2013 by one-third.⁴⁵

Some low-income children also receive nutrition assistance in the summer through federal programs that operate year-round. According to FNS data, in June 2016, 5.8 million infants and children participated in the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and 3 million children participated in the Child and Adult Care Food Program (CACFP).⁴⁶ In addition, an average of 19.2 million children participated each month in the Supplemental Nutrition Assistance Program (SNAP) in fiscal year 2016, according to FNS data.⁴⁷ These benefits are provided year-round, including when school is in session and children may also be eligible to receive school meals. In our previous work on federal domestic food assistance programs, we reported that no one program alone is intended to meet a household's full nutritional needs.⁴⁸ At that time, several officials and providers told us that the

⁴⁵Abt Associates, Inc., Mathematica Policy Research, and Maximus, *Summer Electronic Benefit Transfer for Children (SEBTC) Demonstration: Summary Report*. (May 2016). The evaluation found that 9.1 percent of the eligible households that did not receive Summer EBT benefits experienced very low food security for children from 2011 through 2013 compared to 6.1 and 6.7 percent of the eligible households that received a \$60 or \$30 per child per month Summer EBT benefit, respectively, over the same time period. Very low food security was measured using a survey module developed by USDA to assess and monitor food security in large-scale population studies and was defined as a circumstance when "the food intake of household members is reduced and their normal eating patterns are disrupted because the household lacks money and other resources for food." Since the demonstration was limited to select locations and households, the findings from the evaluation are not generalizable nationwide.

⁴⁶WIC provides low-income pregnant, breastfeeding, and postpartum women, as well as infants and children up to age 5, who are determined to be at nutritional risk with supplemental foods, nutrition education, and health care referrals. The CACFP provides aid to child and adult care institutions and family or group day care homes for the provision of nutritious foods that contribute to the wellness, healthy growth, and development of young children, and the health and wellness of older adults and chronically impaired disabled persons.

⁴⁷SNAP provides monthly benefits to low-income households which may be used to purchase food at authorized retail stores.

⁴⁸GAO, *Domestic Food Assistance: Complex System Benefits Millions, but Additional Efforts Could Address Potential Inefficiency and Overlap among Smaller Programs*, [GAO-10-346](#) (Washington, D.C.: April 2010); and *Domestic Food Assistance: Multiple Programs Benefit Millions of Americans, but Additional Action Is Needed to Address Potential Overlap and Inefficiencies*, [GAO-15-606T](#) (Washington, D.C.: May 2015).

variety of food assistance programs offers eligible individuals and households different types of assistance and can help households fill the gaps and address the specific needs of individual members. For example, a mother with two children may rely on SNAP for her household's basic groceries, the NSLP to feed a school-age child during the school year, and WIC to obtain supplemental foods for herself and an infant.

Nonfederal Programs Also Help Feed Low-Income Children in the Summer, but States and Local Organizations Reported That These Have Limited Reach

Some low-income children also receive summer meals through nonfederal programs, according to our state survey and interviews with organizations involved in summer meals. Twenty-seven states reported in our survey that they were aware of other state- or non-state-funded programs that provided children of low-income households with meals in their states during the summer months.⁴⁹

According to our analysis of state survey responses, local faith-based organizations and foodbanks were the most common types of entities operating these types of programs. Similarly, officials from FNS and two regional organizations we interviewed said they were aware of children receiving summer meals through nonfederal programs operated by faith-based and other community organizations. In addition, SFSP site operators at 6 of the 30 meal sites we visited in the selected states told us nearby foodbanks and faith-based organizations may also be providing children with free meals to some extent. For example, one of the meal sites we visited was operated by a foodbank that, in addition to the SFSP, provided food boxes to those in need and distributed food to other local community organizations to provide to persons in need of immediate assistance, including families with children.

Although FNS and the majority of states do not collect data on nonfederal programs, results from our state survey and interviews with SFSP providers and organizations involved in summer meals indicate the reach of nonfederal programs is limited.⁵⁰ In our survey, states reported that the geographic coverage of these nonfederal programs varied by state, with 11 states indicating that they operated in some portions of the state—the most common state response. In addition, 16 states reported that they

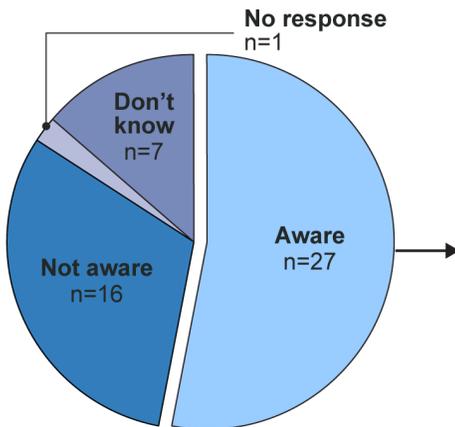
⁴⁹Our survey question asked states to include programs that provide food as a secondary benefit, programs where food is the primary purpose of the program, and year-long programs.

⁵⁰As previously noted, throughout our report, references to “SFSP providers” include both sponsors of SFSP sites and meal site operators, if different from the sponsor.

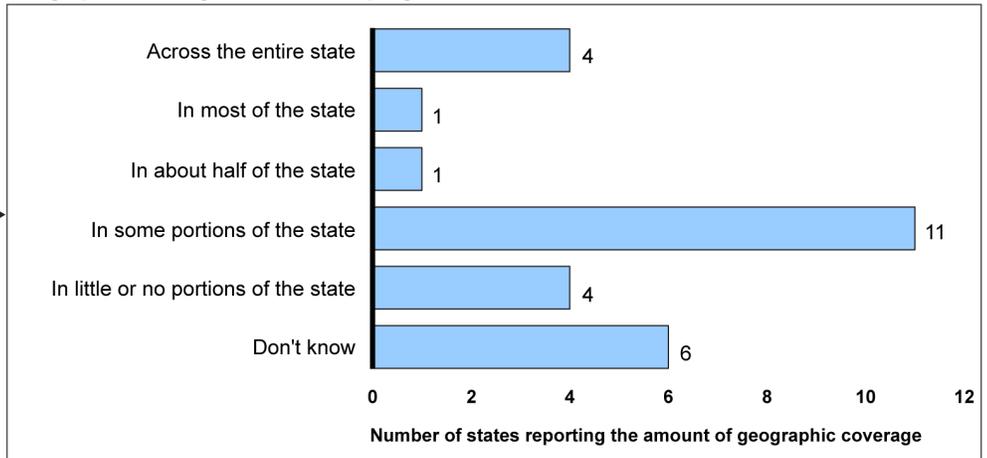
were not aware of any nonfederal programs providing summer meals to children in their state (see fig. 4). Similarly, SFSP site operators at 24 of the 30 meal sites we visited were unaware of nonfederal programs providing meals to children in the areas in which they operated. In addition, officials from several national organizations involved in summer meals told us children have very few options for receiving summer meals beyond the federal summer meals programs. Specifically, officials from one national organization explained that food is often a significant part of the cost of a summer activity program for children and suggested that is one reason why organizations choose to participate in the SFSP.

Figure 4: State Reported Awareness and Geographic Coverage of Nonfederal Programs Providing Meals to Children in Summer 2016

Number of states aware of nonfederal programs providing children meals in summer 2016



Geographic coverage of nonfederal programs in summer 2016



Source: GAO analysis of responses from its survey of state agencies responsible for administering the Summer Food Service Program. GAO obtained responses from 50 states and the District of Columbia. | GAO-18-369

Although the SFSP provides for federal reimbursement of eligible meals and certain administrative and operating costs, nonfederal programs that provide children with summer meals may choose not to participate in the SFSP for several reasons, according to officials we interviewed from several organizations involved in summer meals. For example, some nonfederal program providers may not participate in the SFSP because they are unaware the program exists. Additionally, some nonfederal program providers may be aware of the SFSP, but choose not to participate because they do not want to follow certain program

requirements, such as the nutrition or meal pattern standards. In addition, some providers may not participate in the program because they do not think they can handle certain aspects of the administrative workload associated with the SFSP. For example, a state official we interviewed told us the administrative workload associated with the SFSP can be particularly challenging, especially for smaller sponsors. Similarly, officials from a regional organization involved in summer meals told us one of the providers they work with who operated 10 meal sites chose to leave the SFSP because the paperwork required to operate the sites was too administratively burdensome for their volunteer site operators.

States and SFSP Providers Face Challenges with Meal Sites, Participation, and Program Administration, and FNS Actions Have Addressed Some, but Not All Areas

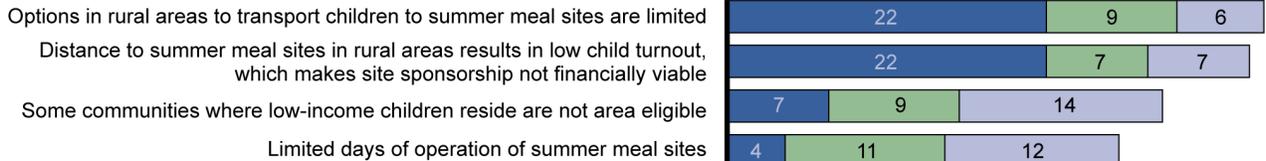
States and SFSP providers reported challenges with meal sites, participation, and administration, though federal, state, and local entities have taken steps to improve these areas. Half or more of states reported in our survey that SFSP issues related to meal site availability, such as in rural areas, increasing children's participation, and program administration were moderately to extremely challenging (see fig. 5).⁵¹ Overall, 41 states reported facing at least one challenge with the SFSP, while 9 reported facing none.⁵²

⁵¹Some states also reported these factors as slightly challenging. In addition, fewer than half of states reported other factors as moderately to extremely challenging. See appendix II for more information on our survey results.

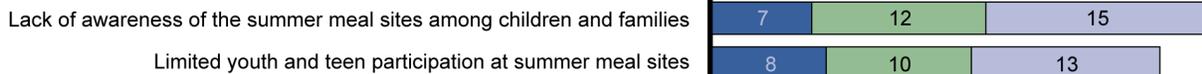
⁵²One state in our survey did not respond to our question on experiencing challenges with administering the SFSP.

Figure 5: Issues Reported as a Moderate to Extreme Challenge with the Summer Food Service Program (SFSP) by Half or More of States in GAO's Survey

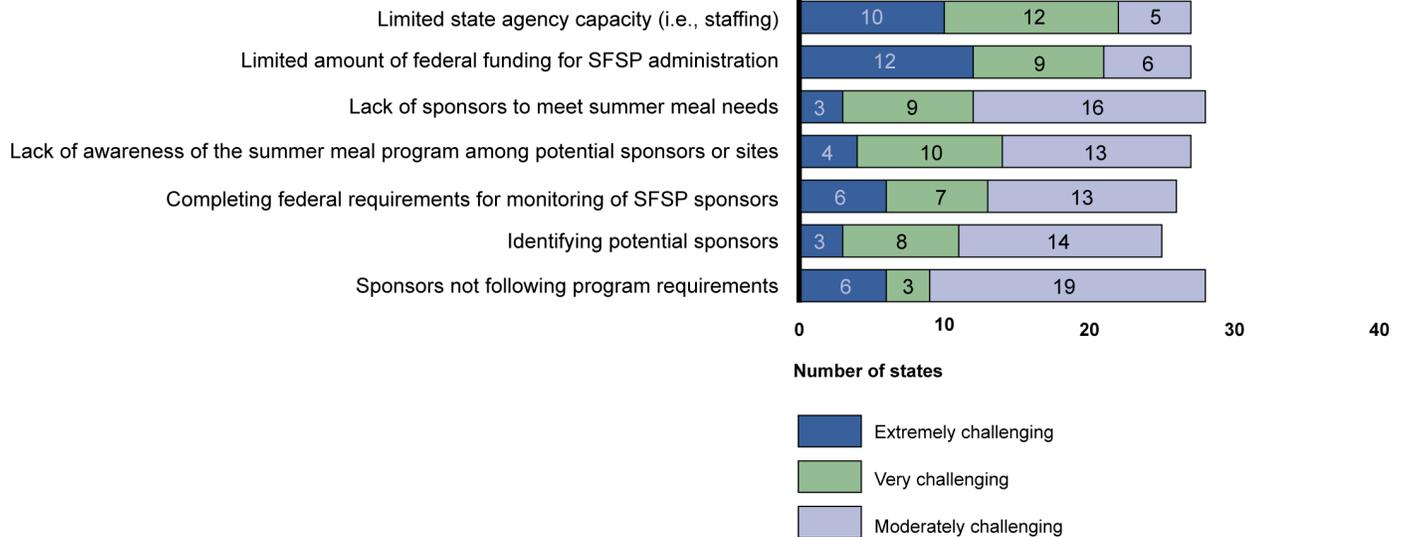
Challenges with availability of meal sites



Challenges with children's participation



Challenges with program administration



Source: GAO analysis of responses from its survey of state agencies responsible for administering the Summer Food Service Program. GAO obtained responses from 50 states and the District of Columbia. | GAO-18-369

Note: Respondents from some states also reported these factors as slightly challenging or not at all. In addition, fewer than half of states reported other factors as moderately to extremely challenging.

Challenges with the Availability of Meal Sites

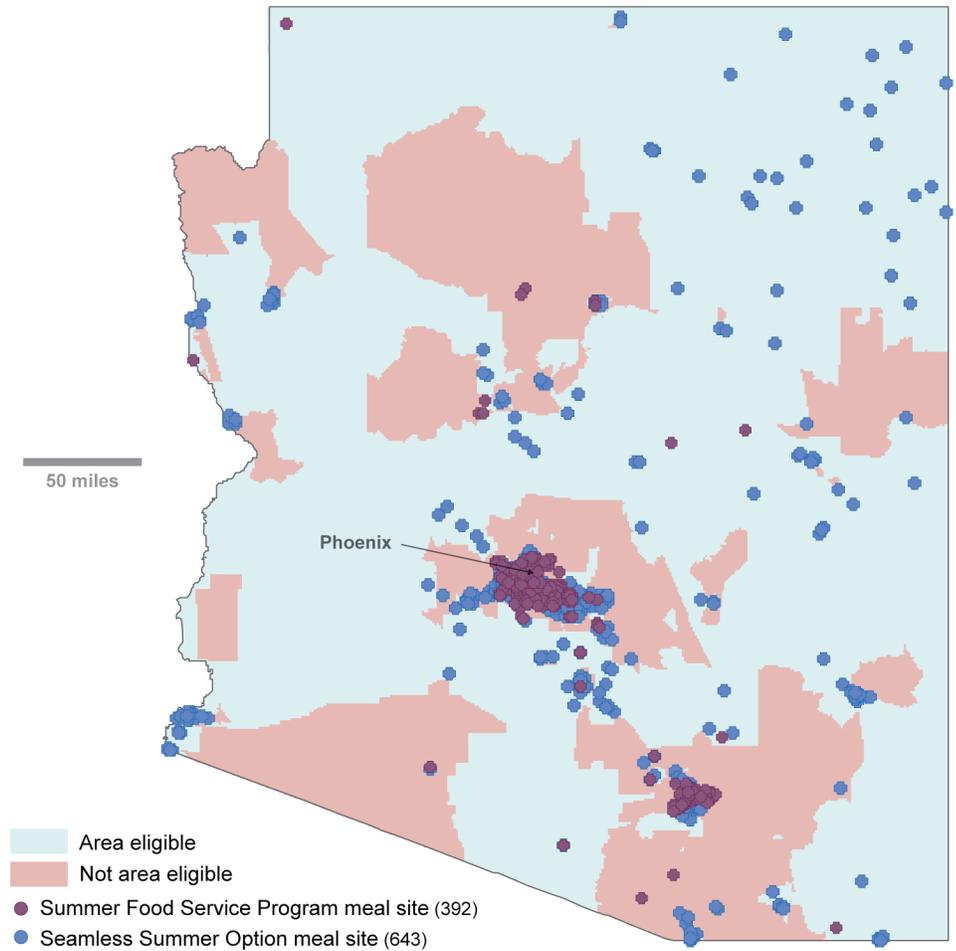
Rural Areas

Availability of transportation, low population density, and limited meal sites pose challenges for SFSP in rural areas, according to states we surveyed, selected national organizations, and state and local officials in the three selected states we visited. More than two-thirds of states in our survey reported they faced a moderate to extreme challenge with limited options in rural areas to transport children to summer meal sites (37), as well as with the distance to summer meal sites in rural areas resulting in low child turnout that affects the financial viability of site sponsorship (36). As officials from one national organization explained, it may not be cost-effective for sponsors to operate in remote or rural areas if there are not enough meal sites or children participating in the program. Similarly, a sponsor in one of the selected states indicated that there are large parts of the state where the distances between meal sites are substantial, and travel between them takes several hours. An official from one of the selected states said transportation challenges can lead to underserved rural areas, including Indian reservations. Of the three states we reviewed, each had rural areas with few or no federally funded meal sites in summer 2016. However, a majority of the children in some of those areas were eligible for free or reduced price school meals, according to Census data provided by FNS, and would therefore be “area eligible” for the purposes of SFSP.⁵³ For example, as shown in figure 6, “area eligible” locations in rural western parts of Arizona did not have any SFSP or Seamless Summer Option meals sites in June 2016, the month with the greatest number of summer meals served in that state.⁵⁴

⁵³See appendix III for additional information, including a map of each of the three selected states we visited.

⁵⁴One state official in Illinois told us there are 13 counties in southern Illinois without sponsors or meal sites.

Figure 6: Area Eligibility and Summer Meal Sites in Arizona, June 2016



Sources: GAO map based on fiscal year 2016 meal site data from Arizona on the Summer Food Service Program (SFSP) and the National School Lunch Program's Seamless Summer Option meal sites for the month with the greatest number of meals served in Arizona (June) and area eligibility data from the Census Bureau's American Community Survey provided by Food and Nutrition Service for fiscal year 2016. MapInfo (map). | GAO-18-369

Note: This figure shows area eligibility as determined by the Food and Nutrition Service's Capacity Builder mapping tool, which is based on the U.S. Census Bureau's American Community Survey estimates of children eligible for free and reduced-price meals by Census block group and tract. However, states and sponsors may use other data to determine whether sites are "area eligible." In addition, certain types of sites may participate in the SFSP and Seamless Summer Option even if they are not area eligible.

States and SFSP providers have responded to challenges with meal sites in rural areas by using other meal delivery approaches—efforts that FNS has supported through information sharing and grants.⁵⁵ For example, according to one national organization involved in summer meals, some SFSP providers offer vans or buses to transport children to meal sites or partner with local bus authorities to give children free rides to meal sites.⁵⁶ Instead of transporting children to sites, other sponsors transport meals to children through mobile meal delivery, an alternative summer meal model used in 48 states according to our survey. In this model, sponsors deliver meals by bus, using a route with state-approved stops in a community, and children consume the meal at the stop under a supervised setting. According to FNS officials and representatives from national organizations, this approach can be particularly helpful for providing summer meals to children in rural areas. State officials in two selected states told us they use mobile meal delivery to help fill gaps in meal service and help children overcome the lack of transportation or resources in their community.⁵⁷ To serve children in very remote areas with limited resources, a sponsor in one of the selected states reported piloting a model involving delivering frozen meals every other week to such areas and supplying equipment, such as freezers and microwaves, to support meal service. To help sponsors address challenges related to meal sites in rural areas, FNS has shared information on alternative delivery models through its SFSP toolkit and webinars and has also provided related grant funding. For example, in summer 2011 and 2012, FNS funded the Meal Delivery demonstration project to provide meals to children in rural areas where low population density, long distances, and transportation issues made it difficult for children to get to SFSP sites,

⁵⁵Throughout our report, references to “SFSP providers” include both sponsors of SFSP sites and meal site operators, if different from the sponsor.

⁵⁶Federal reimbursement is available for SFSP operating costs, which may include the cost of transporting children in rural areas to feeding sites in rural areas. 7 C.F.R. § 225.2.

⁵⁷FNS officials explained it can be challenging to keep children at the mobile route’s stop long enough to consume the meal and qualify for federal reimbursement. To help keep children engaged during the stop and ensure they consume the meal on site, SFSP providers offer physical activities and prizes, according to one sponsor we interviewed. Another sponsor in one selected state said their library mobile reading model combines the library’s mobile book service with bringing meals to children.

making site and sponsor operation financially unsustainable.⁵⁸ The demonstration project funded meals to children in rural areas of Delaware, Massachusetts, and New York, providing food delivery to homes or drop-off sites near homes of eligible children.⁵⁹

Area Eligibility

More than half the states (30) in our survey reported they faced a moderate to extreme challenge reaching low-income children in communities that are not area eligible. Areas in which fewer than 50 percent of children qualify for free or reduced-price meals during the school year are not eligible to have open summer meal sites at which all children who come to the site can receive a free meal. As a result, some children who are eligible for free and reduced-price meals during the school year do not have open summer meal sites located in close proximity to their residences, according to several national organization officials and SFSP providers. Eligible children in these areas may instead be limited to other types of SFSP sites, such as closed enrolled summer meal sites, or nonfederal programs providing meals, if available.⁶⁰ For example, in one of the selected states, a sponsor of SFSP sites funded meals without federal support at one site that they operated as an open

⁵⁸These projects were carried out under USDA's demonstration authority discussed earlier, which was first established by the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010. The act appropriated \$85 million to develop and test methods of providing access to food for low-income children in urban and rural areas during the summer months when schools are not in regular session, to reduce or eliminate the food insecurity and hunger of low-income children and improve their nutritional status. Subsequent appropriations acts have continued to provide funding for demonstrations. FNS developed a multi-phased demonstration approach to test different strategies to improve program participation—both enhancements to the existing SFSP, known as eSFSP demonstrations, and new ways of providing nutrition assistance to low-income children in the summer, such as the Summer EBT.

⁵⁹States applying for the meal delivery project were required to select sites in rural areas. According to a 2013 FNS report evaluating the eSFSP demonstrations, FNS reported that enhancements to the SFSP appeared to reach the targeted low-income children, although the reach remained limited. Furthermore, the report found that the demonstrations' impact on food security remained unclear. *Report on the Summer Food for Children Demonstration Projects for Fiscal Year 2013, U.S. Department of Agriculture Food and Nutrition Service, A Report to Congress, December 2013.*

⁶⁰Closed enrolled sites limit participation to children enrolled in a program. All enrolled children receive free meals as long as at least 50 percent of the children enrolled meet the income eligibility standards. Eligibility for closed enrolled sites is determined through applications completed by household members on behalf of the child enrolled, or other sources of information that can be used to determine site eligibility, such as school or census data. According to officials from one national organization involved in summer meals, there are relatively few closed enrolled sites that serve income-eligible children.

site in order to serve low-income children residing in low-income housing. These children did not otherwise have access to a federally funded summer meals site, according to these officials, because the broader area was part of a school district that had a greater than 50 percent proportion of children from higher-income families.

Recognizing that some children may reside in an area that is not area eligible but is immediately adjacent to such an area, FNS has allowed additional flexibility in establishing area eligibility for open meal sites. Specifically, in 2014 and 2016 policy memos, FNS expanded the ways in which states and sponsors can use Census data to establish area eligibility. For example, FNS has allowed states and sponsors to average Census data across adjacent geographic areas to determine area eligibility.⁶¹ FNS noted that these additional flexibilities help ensure meal sites can be located in more areas in which poor economic conditions exist.

Limited Days of Operation

Nearly all states (50) reported in our survey that the availability of meal sites throughout the summer months was a factor critical to the success of the SFSP, yet more than half the states (27) also reported they faced a moderate to extreme challenge with limited meal site days of operation. Nineteen of the 40 states that provided information about site days of operation reported 1 day as the shortest length of operation for SFSP sites in their state in fiscal year 2016.⁶² Limited meal site days of operation was a significant challenge in one of the three selected states we visited, as almost one-quarter of sites operated for only 1 to 2 weeks across a 2-month period in summer 2016, and an additional half of sites

⁶¹SP 08-2017, CACFP 04-2017, SFSP 03-2017: *Area Eligibility in Child Nutrition Programs*, December 1, 2016. SP 49-2014, CACFP 13-2014, SFSP 19-2014: *Area Eligibility Using Census Data*, May 28, 2014. According to FNS, up to three adjacent census block groups may be averaged, using a weighted average, to determine eligibility. Meal sites are considered area eligible if the percentage of children eligible for free or reduced-price meals in the “referent” census block group and up to two additional adjacent census block groups, when averaged, is 50 percent or more, provided that at least 40 percent of children in each of the census block groups are eligible for free or reduced-price meals.

⁶²Nineteen states reflect the highest frequency of responses provided by states responding to this survey question. In addition, 11 states reported the shortest operation among their SFSP sites was 5 days. The remaining 10 states reported the shortest number of days of operation in the range of 3 to 81 days. According to officials from one national organization involved in the SFSP, meal sites operating for 1 day may be one-time events. Such one-time or special events could include a summer kick-off event in the community to help promote awareness of the program.

operated for 3 to 4 weeks across that same period, according to our analysis of state data.⁶³ In contrast, in the other two selected states, the majority of sites (64 and 76 percent, respectively) operated for 5 or more weeks during a 2-month period. SFSP sites may have limited days of operation for various reasons, such as constraints with program administration and costs, according to interviews with a national organization official and a sponsor in one of the selected states.

Some SFSP providers and national organizations involved in summer meals have responded to these challenges by working to extend the days of operation of meal sites—efforts that FNS has supported through related grant funding. Officials from one meal site located at a school in one of the selected states told us that 2017 was the first year the site stayed open an additional 4 weeks after summer school classes ended in an effort to expand participation, an extension made possible through support from an experienced sponsor. In addition, officials from a national organization involved in sponsoring summer meals told us they encourage their local sites to operate in August—a month where there are generally fewer summer meal service offerings—to meet children’s needs. At the federal level, under its demonstration authority, FNS funded the Extending Length of Operation Incentive project, a grant which provided an additional 50-cent reimbursement for all lunch meals served at sites in Arkansas in 2010 that offered meals for 40 or more days.⁶⁴

⁶³Our analysis of selected state data on meal sites was for June, July, and August 2016. In our analysis, weeks were measured as 5 days instead of 7.

⁶⁴According to a 2013 FNS report evaluating the eSFSP demonstrations, FNS reported that enhancements to the SFSP appeared to reach the targeted low-income children, although the reach remained limited. Furthermore, the report found that the demonstrations’ impact on food security remained unclear. *Report on the Summer Food for Children Demonstration Projects for Fiscal Year 2013, U.S. Department of Agriculture Food and Nutrition Service, A Report to Congress* (December 2013).

Challenges with Children's Participation

Awareness of the SFSP Program and Meal Sites

Two-thirds of states (34) reported through our survey that they also faced a moderate to extreme challenge with a lack of awareness of summer meal sites among children and families, a challenge also mentioned by SFSP providers in the selected states. Meal site operators in one selected state noted that making families aware that all children may receive a meal for free at open sites can be a challenge. For example, one sponsor operating a meal site in a school said the perception among some is that the meal program is only for children attending summer school, and not for others in the community. Although that site had outside banners and advertising to help address that misperception, another SFSP provider explained that having sufficient funds to market the SFSP and increase awareness among families is also a challenge.⁶⁵

To address these challenges, state agencies, some SFSP providers, and FNS have taken steps to help promote awareness of the SFSP. For example, nearly all states (47) reported in our survey that they have increased their outreach efforts for the SFSP in the last 5 years. More than half of states (36) also reported increases in overall SFSP participation during that time, which they believe were related to their outreach efforts. The majority of states in our survey reported conducting outreach on the SFSP to groups including children, parents and guardians, and schools, among others, using methods such as flyers, email, newspapers, and social media (see fig. 7).⁶⁶ Further, state agency officials and sponsors in the selected states reported that they have developed partnerships with state and local advocacy groups and community leaders, among others, to promote the SFSP. For example, one state agency official said they partner with local advocacy organizations to field calls from parents seeking information about summer meal sites through their hunger hotline. FNS has promoted the use of such partnerships, as well as traditional and social media, to raise awareness of the SFSP. In addition, FNS developed the Summer Meals

⁶⁵Federal reimbursement also includes funds for some administrative costs, such as for planning, organizing, and managing a food service under the program.

⁶⁶States in our survey also reported conducting outreach on the SFSP to other groups, including potential sponsor organizations and sites, and governments.

Site Finder, an online mapping tool that provides information on summer meal sites nationwide.⁶⁷

Figure 7: Examples of Marketing and Advertising Methods Used at Summer Food Service Program (SFSP) Meal Sites in Selected States



Poster advertising free summer meals at health clinic meal site.



A-frame advertising of SFSP open meal site.



Lawn sign advertising free summer meals in English and Spanish.

Source: GAO. | GAO-18-369

Youth and Teen Participation

Attracting children of all ages to SFSP meal sites can also be a challenge, according to states and SFSP providers. More than half of the states (31) reported in our survey that they faced a moderate to extreme challenge with limited youth and teen participation at summer meal sites, and an official from a national organization involved in the SFSP explained that it is difficult to attract children to a meal site when the site is focused solely on food. Similarly, 46 states in our survey reported that providing age-appropriate programming and enrichment activities for children at summer meal sites is a factor critical to the success of the SFSP. However, some meal sites may lack the resources to add activities, according to some SFSP providers in the selected states as well as FNS and national organization officials. Attracting teens can be particularly challenging, in part because of meal service time periods, a lack of age-

⁶⁷The Summer Meals Site Finder is a web-based application developed by FNS to help children, parents, and others quickly and easily find summer meal sites near them. The mapping tool allows users to enter an address, city, state, or zip code to find up to 50 nearby locations, along with their addresses, hours of operation, contact information, and directions. According to FNS officials, information in the Summer Meals Site Finder is voluntarily submitted to FNS by states.

appropriate activities, and stigma, according to national organizations and providers we interviewed. For example, early morning meal sites generally attract younger kids as teens may be apt to sleep later in the summer, and teens may also perceive a stigma in participating in a free meal program and may face peer pressure not to eat. In addition, meal offerings at SFSP sites may also present challenges to teen participation. Specifically, because FNS bases minimum portion size requirements for meals on the needs of younger children, meals are not always adequate to meet the nutritional needs of teens, according to one sponsor we interviewed.⁶⁸ Across the 30 meal sites in the 3 states we visited in summer 2016, we observed variety in the meals served during different meal services. (see fig. 8.)

⁶⁸SFSP regulations allow sponsors to serve children age 12 and older larger portions based on the greater food needs of older children. 7 C.F.R. § 225.16(d). According to FNS guidance, sponsors may serve teenagers the adult-size portions found in the CACFP regulations, 7 C.F.R. § 226.20(c). The guidance also notes that extra food may always be served to improve the nutrition of participating children; however, meals containing additional foods or larger portion sizes than the minimum required serving size receive the same reimbursement rate as regular SFSP meals.

Figure 8: Examples of Summer Food Service Program (SFSP) Meals Served in Selected States



Breakfast offering of nectarine, muffin, and milk.



Breakfast offering of juice, waffle, and milk.



Lunch offering of taco, grapes, hard-boiled egg, clementine, and chocolate milk.



Lunch offering of ham and cheese sandwich, tater tots, watermelon, raisins, milk, carrots, and fruit popsicle.

Source: GAO. | GAO-18-369

Spotlight on Cops N Kids Program in Massachusetts

The Cops N Kids Program is a year-round effort by a local police department in Massachusetts to reduce juvenile delinquencies and to build stronger relationships with local youths. Also serving as a Summer Food Service Program (SFSP) site, Cops N Kids partnered with Project Bread, a nonprofit organization, to provide breakfast and lunch to children participating in the program. Programming at the site includes basketball, nutrition programs, and community gardening, among others. According to the sponsor of this program, their site serves between 130 and 140 meals a day.

Source: Information gathered during visit with Cops N Kids meal site in Massachusetts. | GAO-18-369

States and SFSP providers have collaborated with others and sought specific types of sites to help provide enrichment activities and attract certain age groups—efforts that FNS has supported through information sharing and related grant funding. Sponsors in the selected states said they have focused on partnerships with groups such as those focused on youth development, churches, libraries, and police or fire departments, to offer age-appropriate activities for children (see fig. 9). For example, programs with local police departments, such as Cops N Kids in one selected state, or libraries in two selected states, provided meal services in combination with youth development or other enrichment activities. (See sidebar for highlights on the Cops N Kids program.) One national organization official said activities at SFSP sites can help take away the stigma around the program because children are not just there for the meal. Efforts to rebrand the SFSP as a community event where entire families can participate at the meal site also can have this effect, which is why some sponsors in the selected states said they partnered with foodbanks to donate meals for adults. In addition, a sponsor in one selected state told us they adjusted their meal offerings to match the needs of children of different age groups, for example, by serving meals to younger children earlier in the day and meals to teens later in the day.⁶⁹ To support participation from children of all ages, FNS has shared information on age-appropriate activities through its SFSP toolkit and provided related grant funding. For example, in 2010, FNS funded the Activity Incentive demonstration project, in which sponsors in Mississippi were provided with mini-grants to increase enrichment and recreational activities, such as education, tutoring, sports and games, arts and other activities, to draw children to meal sites.

⁶⁹Under SFSP requirements, sponsors generally cannot receive federal reimbursement for both lunch and supper services served on the same day. According to this sponsor, they raised other funding in order to provide teens with a supper service, in addition to the lunch service, which qualified for federal reimbursement.

Figure 9: Examples of Activities Offered for Children at Summer Food Service Program Meal Sites in Selected States



Partnership with local fire department to provide water activities for children at a Summer Food Service Program site in Arizona.



Children playing games at a Summer Food Service Program site in Illinois.



Youth and teens playing basketball at a Summer Food Service Program site in Massachusetts.

Source: GAO. | GAO-18-369

Challenges with Program Administration

More than half the states reported in our survey that they faced a moderate to extreme challenge with limited state agency staffing (27), a limited amount of federal funding for SFSP administration (27), as well as ensuring sponsor participation to meet needs (28). In addition, 28 states reported in our survey that they faced a moderate to extreme challenge with sponsors not following program requirements. Limited staffing can affect a state agency's ability to conduct efforts aimed at increasing participation, identifying potential sponsors, and reviewing and monitoring sponsors, according to national organization and state officials we interviewed. For example, increases in sponsors and sites requires additional staff and time to conduct pre-approval visits, sponsor and site reviews, vendor reviews, and technical assistance visits, which directly affects the amount of funding needed to support staff salaries and travel reimbursement, according to one state in our survey. However, because the SFSP administrative funds FNS provides to states are based on the number of meals served in the previous year, increasing the number of staff to help increase SFSP participation is difficult, according

to a national organization official we interviewed.⁷⁰ States reported a moderate to extreme challenge with the following issues related to ensuring sponsor participation: a lack of sponsors to meet summer meal needs, a lack of awareness of the summer meal program among potential sponsors or sites, completing federal requirements for monitoring of SFSP sponsors,⁷¹ and identifying potential sponsors.

State agencies responsible for administering the SFSP reported relying on other resources and partners to help with program administration—strategies that FNS has supported through information sharing and its online tools. As discussed earlier, all three selected state agencies we interviewed told us they partner with advocacy groups to help expand and conduct outreach on the SFSP. Additionally, more than half the states in our survey reported several factors—which may ease the administrative burden on states—as critical to the success of the SFSP, including partnerships with SFSP sponsors (49) and retaining sponsors and sites over multiple summers (51). To support states’ use of alternative funding sources to help administer the SFSP, FNS has shared information on federal, state, and private funding and grant opportunities. FNS also developed the online Capacity Builder tool, which 35 states reported in our survey was moderately to extremely useful in identifying or confirming meal site eligibility in fiscal year 2017.⁷²

⁷⁰Not later than February 15 of each year, each state agency must submit to FNS a program management and administration plan for that fiscal year, which includes among other things, the state’s administrative budget for the year. 7 C.F.R. § 225.4 States’ administrative funding amounts are calculated according to a formula that is based on the amount they received in the previous fiscal year. 7 C.F.R. § 225.5(a)(1). According to FNS officials, if states plan to expand their programs in the coming summer, it will be factored into the administrative allocation they receive.

⁷¹For example, states are required to conduct certain sponsor and site reviews and take corrective action when they find violations of program requirements, among other things, See 7 C.F.R. §§ 225.7(d), 225.11.

⁷²The Capacity Builder tool allows users to visualize “layers” of information, such as underserved areas, and identify potential locations for new sites. Users can find their nearest potential community partners such as multi-family housing units, libraries, faith-based institutions, military bases, and schools.

States and SFSP Providers Also Reported Challenges with Meal Site Safety and Duplicative Paperwork, and FNS's Efforts to Address These Areas Are Limited

Seventeen states reported in our survey that ensuring summer meal sites are in safe locations was moderately to very challenging, a challenge that some states and SFSP providers have taken steps to help address.⁷³ State officials and SFSP providers in the selected states reported that when crime has occurred near a site, there are concerns about ensuring children's safety while they are consuming meals at the site, as well as the safety of site staff delivering meals. Some sponsors noted, in particular, parents' concerns for the safety of their children at meal sites in light of criminal activities in the surrounding area. To ensure children continue to have access to meals, some sponsors noted that in the event of an immediate threat at an outdoor meal site, site staff are sometimes able to bring children to a nearby indoor space instead. States and SFSP provider officials in two selected states told us they have also used other strategies, including partnerships with local law enforcement agencies, to help address safety concerns during the meal service and ensure children have access to meals. For example, national organizations involved in summer meals and sponsor officials in the selected states said they encourage partnerships with local police departments to use police escorts at meal sites or to follow mobile meal routes in situations where safety at the meal site is a concern. When violence or crime has occurred near a site, some states and SFSP sponsors have also sought flexibility from FNS with respect to the federal requirement that children consume summer meals on site,⁷⁴ according to state and local officials.

FNS has used its available authorities to grant some states and sponsors flexibility with respect to the requirement that children consume summer meals on site, such as when safety at the site is a concern; however, FNS has not clearly communicated to all states and sponsors the circumstances it considers when deciding whether to grant this

⁷³As noted earlier in our report, half or more of states in our survey reported facing a moderate to extreme challenge with several SFSP issues. In addition, fewer than half of states reported other factors as moderately to extremely challenging. In addition to the 17 states that reported on the issue of safe locations as moderately to very challenging, 14 states reported this issue as slightly challenging, 7 states reported this as not at all challenging, 3 states reported they did not know, and 10 states reported no response. In our survey, we did not define "safe locations." See appendix II for more information on our survey results and on the full list of challenges states reported.

⁷⁴7 C.F.R. § 225.6(e)(15).

flexibility.⁷⁵ According to our review of letters FNS sent to multiple states approving their requests for this type of flexibility, the agency identified a consistent set of circumstances that needed to be met for it to grant this flexibility.⁷⁶ These circumstances were described in the letters the agency sent to states and generally included verification that violent crime activities occurred within both a 6-block radius of the meal site and 72 hours prior to the meal service.⁷⁷ FNS's letters to states indicate that when documentation was provided to the agency showing that these circumstances existed at a summer meals site on a particular day or days, meals consumed by children off site on those days were eligible for federal reimbursement.⁷⁸ Although FNS has issued guidance on the general processes for requesting flexibility from program requirements under its waiver and demonstration authorities, these guidance documents do not detail the specific circumstances that the agency considers when deciding whether to grant flexibility from the on-site requirement due to safety concerns.⁷⁹ FNS has communicated this information only in its responses to specific state and sponsor requests, and it has not communicated these circumstances more broadly to all

⁷⁵For example, FNS has granted some states and sponsors flexibility from this requirement in situations of crime or violence under its waiver and demonstration authorities. See 42 U.S.C. § 1760(l) and the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010, Pub. L. No. 111-80, § 749(g), 123 Stat. 2090, 2132-33, most recently funded by the Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, div. A, tit. IV, 132 Stat. 348.

⁷⁶These approvals of states' requests for flexibility were made under FNS's demonstration authority.

⁷⁷Violent crime activities were defined in FNS's letters to states as murder, attempted murder, aggravated assault, and armed robbery.

⁷⁸FNS did not grant sites continued flexibility over multiple days or for the remainder of that site's operations over the summer unless the site provided such documentation for each day they requested the flexibility.

⁷⁹For example, in its policy memo SP 14-2017, SFSP 07-2017, Demonstration Project for Non-Congregate Feeding for Outdoor Summer Meal Sites Experiencing Excessive Heat with Q&As (Jan. 2017), FNS stated that it may extend this heat-related demonstration project to other situations where exceptional circumstances make congregated meals at approved sites not viable or unsafe. The guidance further stated that such "exceptional circumstance" requests would be considered on a case-by-case basis, and that requests should clearly describe the problem, justify the need for the exception, and describe how the sponsors' operations will change and how eliminating the congregated meal requirement will address the problem. In addition, FNS also issued SP 27-2017, CACFP 12-2017, SFSP 08-2017, Child Nutrition Program Waiver Request Guidance and Protocol (Apr. 2017), which provides an overview of the statutory waiver authority, the waiver request and review process, and data reporting requirements.

states and sponsors. FNS officials explained that they review state and sponsor requests for flexibility due to safety concerns on a case-by-case basis. However, they also acknowledged that the set of circumstances used for approval of state and sponsor requests for flexibility, which we identified in their letters to states, has been used repeatedly.

Further, states and sponsors reported challenges obtaining the specific data needed for approval of a site for this type of flexibility, hampering some providers' efforts to ensure safe delivery of meals. For example, state agency and sponsor officials in one selected state said obtaining the crime data needed to qualify for the flexibility can be an administrative burden on sponsors, and these data are not consistently available in a timely manner. According to state agency and sponsor officials in one of the selected states, daily crime statistics are not available in all areas, and while a sponsor can sometimes access current data on crime in a city, the most recent available data on crime in suburban areas are sometimes one year old. FNS is aware of state and local challenges obtaining the necessary crime data, according to our discussions with FNS officials. FNS officials acknowledged that while they have granted some state and sponsor requests to allow children to consume meals off site in certain areas where violence or crime has occurred, some sponsors were unable to implement the flexibility because they could not obtain the necessary crime data.⁸⁰

To help achieve agency objectives and address related risks, the *Standards for Internal Control in the Federal Government* state that agencies should communicate key information to their internal and external stakeholders.⁸¹ Although FNS officials told us they do not have one set of circumstances under which they approve these requests, our review found only one set of circumstances under which this type of flexibility has been approved. However, FNS has not broadly communicated the circumstances it considers in deciding whether to approve requests for flexibility with respect to the requirement that children consume summer meals on site in areas with violence or crime. Unless FNS shares this information with all states and sponsors, states

⁸⁰According to the letters we reviewed approving flexibility under FNS's demonstration authority, FNS has allowed states and sponsors to use the flexibility and retroactively provide the documentation that a crime occurred within 72 hours and within 6 blocks of the meal site on that day. However, if the documentation is not available or not sufficient, the sponsor risks not being reimbursed for meals that were consumed off site that day.

⁸¹[GAO-14-704G](#).

and sponsors will likely continue to be challenged to use this flexibility, hindering its usefulness in ensuring safe summer meal delivery to children.

In addition, FNS has issued reports to Congress evaluating some of its demonstration projects, as required under its statutory authorities, but the agency has not issued any such reports to Congress specifically on the use of flexibilities with respect to the on-site requirement in areas where safety is a concern. As previously discussed, the agency is required to annually submit certain reports to Congress regarding the use of waivers and evaluations of projects carried out under its demonstration authority.⁸² Furthermore, *Standards for Internal Control in the Federal Government* state that management should use quality information to make informed decisions and evaluate the entity's performance in achieving key objectives and addressing risks.⁸³ Yet, FNS has not evaluated nor reported on the use of waivers and demonstration projects in cases where safety was a concern. Although FNS requests reports from state agencies or sponsors that have received flexibility with summer meals delivery under FNS's demonstration and waiver authorities, FNS officials told us they have not assessed whether their use of these flexibilities to address safety issues has been effective in ensuring safe meal delivery. FNS officials told us that they have not evaluated or reported on these flexibilities, in part, because they have limited

⁸²Specifically, the Secretary of Agriculture is required to annually submit to the Committee on Education and Labor in the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate a report that summarizes the use of waivers and describes whether they resulted in improved services to children, the impact of the waivers on providing nutritional meals to participants, and how the waivers reduced the quantity of paperwork necessary to administer the program. 42 U.S.C. § 1760(l). In addition, the Secretary is required to provide for an independent evaluation of the projects carried out under its demonstration authority, and submit annual reports to the same Committees on the status of each demonstration project and the results of the evaluations for the previous fiscal year. Further, not later than 120 days after the completion of the last evaluation, the Secretary is required to submit a report that includes recommendations on how to improve children's access to food during the summer months when school is not in regular session. See the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010, Pub. L. No. 111-80, § 749(g), 123 Stat. 2090, 2132-33, most recently funded by the Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, div. A, tit. IV, 132 Stat. 348.

⁸³[GAO-14-704G](#).

information on their outcomes.⁸⁴ Without understanding the impact of its use of these flexibilities, neither FNS nor Congress knows whether these flexibilities are helping provide meals to children.

In addition to the challenges with safety at meal sites, sponsors also sometimes face administrative challenges when participating in multiple child nutrition programs that are operated by different state agencies or divisions within the same agency, according to officials from national and regional organizations and sponsors we interviewed. For example, officials from national organizations involved in summer meals told us the management of each child nutrition program and processes related to applications, funding, and oversight are fragmented in many states. For example, a sponsor in one of the selected states told us aspects of the SFSP and CACFP sponsor applications are highly duplicative and estimated it took 42 hours last year to complete duplicative paperwork. Another sponsor that provides school meals during the school year told us they had to fill out 60 additional pages of paperwork to provide summer meals, which coupled with having a state contact for the SFSP that was different from the one they worked with for the NSLP, was a significant burden for them. Officials from one national organization told us a lack of interoperability of some state agencies' data systems has caused challenges and administrative burden for some sponsors.⁸⁵ For example, in some states, different agencies oversee child nutrition programs, yet are unable to share data on sponsor approval, and therefore, sponsors are required to submit similar information to both, according to these officials. Duplicative paperwork can be particularly

⁸⁴In its letters to states approving their requests for flexibility with the requirement to consume meals on-site when safety is a concern, FNS requested states and sponsors to submit reports on the implementation and results of the flexibility. However, FNS officials told us they do not always receive this information.

⁸⁵In our previous work on other federal low-income programs, we reported that computer systems can be used as a tool to streamline program administration, and that data-sharing arrangements, where permitted by federal law, allow programs to share client information that they otherwise would each collect and verify separately, thus reducing duplicative effort, saving money, and improving integrity. GAO, *Federal Low-Income Programs: Eligibility and Benefits Differ for Selected Programs Due to Complex and Varied Rules*, [GAO-17-558](#) (Washington, D.C.: June 29, 2017). In other prior work on human services programs' data sharing efforts, we also reported that some of the challenges to such data sharing included confusion or misperceptions around what data state and local agencies were allowed to share, as well as a tendency to be risk averse and overly cautious in these agencies' interpretation of federal privacy requirements. GAO, *Human Services: Sustained and Coordinated Efforts Could Facilitate Data Sharing While Protecting Privacy*, [GAO-13-106](#), (Washington, D.C.: Feb. 8, 2013).

burdensome for some SFSP providers, as national organization officials and SFSP providers in the selected states said completing SFSP application paperwork can be especially challenging when a sponsor has staff shortages or no dedicated SFSP staff.

Some selected states have worked with SFSP sponsors to help minimize the administrative burden. For example, state agency officials from one of the selected states said they have connected less-experienced sponsors to more-experienced sponsors in the community to help them with program administration. In one case, an experienced SFSP sponsor partnered with a small sponsor new to the program to help with SFSP administration, including helping them understand program rules and paperwork requirements. One SFSP sponsor also noted that their state agency took additional steps to ease administrative burden, such as making the forms for the CACFP more consistent with those for the SFSP and streamlining certain requirements for large and experienced sponsors, which the sponsor found helpful.

At the federal level, FNS has established program and policy simplifications to help lessen the administrative burden on sponsors participating in multiple child nutrition programs, though the persistence of these challenges indicate that information about these simplifications has not reached all relevant state agencies. While FNS officials told us that some of the duplicative requirements may be a function of differences in statute, FNS provided guidance to states in 2011 and 2014 on simplified application procedures for institutions participating in CACFP that also wish to apply for SFSP.⁸⁶ FNS noted in its guidance that in states where CACFP and SFSP are administered by different state agencies, state agencies are encouraged to work together to share information and streamline the application and agreement process as much as possible. FNS also addressed these simplifications in a state agency meeting in November 2017. Additionally, FNS provided guidance to states in 2012 on simplified application and review procedures for school food authorities participating in the NSLP that wish to also participate in the SFSP.⁸⁷ Although FNS has shared this information with states in an

⁸⁶As discussed earlier, the CACFP provides aid to child and adult care institutions and family or group day care homes for the provision of nutritious foods that contribute to the wellness, healthy growth, and development of young children, and the health and wellness of older adults and chronically impaired disabled persons.

⁸⁷SP-07-2013, SFSP-04-2013, *Summer Feeding Options for School Food Authorities* (November 2012).

attempt to make them aware of streamlining options, FNS officials noted that some states may choose not to implement them.

Standards for Internal Control in the Federal Government state that management should externally communicate the necessary quality information to achieve the entity's objectives, as well as periodically evaluate the methods of communication to ensure communication is effective and appropriate.⁸⁸ FNS's existing guidance addresses options for streamlining administrative requirements for sponsors participating in multiple child nutrition programs. However, information on program and policy simplifications available for sponsors participating in both NSLP and SFSP has not been shared with states recently, and challenges in this area persist, indicating this information has not reached all relevant state agencies. Without further efforts from FNS to disseminate information on current options for streamlining administrative requirements across child nutrition programs, overlapping and duplicative administrative requirements may limit children's access to meals by discouraging sponsor participation in child nutrition programs.

Conclusions

The purpose of the SFSP is to continue to provide children in low-income areas with nutritious meals over the summer when school is no longer in session, and to that end, the program provided 149 million SFSP meals to children in fiscal year 2016. Although meals served are one indicator of participation, FNS's current estimates of children participating in SFSP are unreliable. Without additional understanding of children's participation in the SFSP, FNS lacks information critical for informing program implementation, strategic planning, and outreach.

The majority of states nationwide and SFSP providers in the three states we visited reported experiencing a number of challenges with the SFSP, and FNS has taken important steps to address these challenges. Two key challenges identified by officials in the selected states and national organizations we interviewed are ensuring summer meal sites are in safe locations, and meeting administrative requirements when participating in multiple child nutrition programs. FNS has taken steps to address these challenges by providing flexibilities in how meals are delivered to children and streamlining options for those providers participating in more than one child nutrition program. However, a lack of clarity concerning the

⁸⁸ [GAO-14-704G](#).

circumstances under which FNS grants flexibilities in areas of violence and crime, and a lack of information on its use of these flexibilities and their impact on program administration, hinder efforts to ensure program goals are met. Furthermore, absent a reminder to states regarding existing options for streamlining administration across multiple nutrition programs, some providers may continue to be discouraged from participating in these programs due to duplicative and burdensome administrative requirements, which may ultimately limit the provision of nutritious meals to children.

Recommendations for Executive Action

We are making the following four recommendations to FNS:

The Administrator of FNS should improve its estimate of children's participation in the SFSP by focusing on addressing, at a minimum, data reliability issues caused by variations in the number of operating days of meal sites and in the months in which states see the greatest number of meals served. (Recommendation 1)

The Administrator of FNS should communicate to all SFSP stakeholders the circumstances it considers in approving requests for flexibility with respect to the requirement that children consume SFSP meals on-site in areas that have experienced crime and violence, taking into account the feasibility of accessing data needed for approval, to ensure safe delivery of meals to children. (Recommendation 2)

The Administrator of FNS should evaluate and annually report to Congress, as required by statute, on its use of waivers and demonstration projects to grant states and sponsors flexibility with respect to the requirement that children consume SFSP meals on-site in areas experiencing crime or violence, to improve its understanding of the use and impact of granting these flexibilities on meeting program goals. (Recommendation 3)

The Administrator of FNS should disseminate information about existing flexibilities available to state agencies to streamline administrative requirements for sponsors participating in the SFSP and other child nutrition programs to help lessen the administrative burden. For example, FNS could re-distribute existing guidance to state agencies that explains available flexibilities and encourage information sharing. (Recommendation 4)

Agency Comments and Our Evaluation

We provided a draft of this report to the Secretary of the USDA for review and comment. FNS officials provided technical comments, which we incorporated as appropriate. In addition, in oral comments, FNS officials, including the Deputy Administrator for Child Nutrition Programs, generally agreed with the recommendations in the report.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the Secretary of the USDA and interested congressional committees. The report will also be available at no charge on the GAO website at www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or larink@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Kathryn A. Larin, Director
Education, Workforce, and Income Security Issues

Appendix I: Objectives, Scope and Methodology

This appendix discusses in detail our methodology for addressing three research objectives: (1) What is known about participation in the Summer Food Service Program (SFSP) and how has it changed in the last 10 years? (2) What other programs help feed low-income children over the summer? and (3) What challenges exist, if any, in providing summer meals to children, and to what extent does the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) provide assistance to states and sponsors to address these challenges? In addition to the methods we discuss below, to address all three research objectives, we reviewed relevant federal laws, regulations, and guidance; interviewed FNS officials in its headquarters and seven regional offices; and interviewed a broad range of regional and nationwide organizations involved in the SFSP.¹ In addition, we coordinated with officials in USDA's Office of Inspector General on their ongoing work in this area.

Summer and School Meals Data

To address our first objective about participation in the SFSP, we analyzed FNS data on meals served for fiscal years 2007 through 2016.² Specifically, we analyzed the total number of meals served nationwide through the SFSP from fiscal year 2007 through fiscal year 2016.³ Each month, states report to FNS the number of meals served by meal type (breakfast, lunch, snack, and supper) and the number of meals served by meal and sponsor type (e.g., government, nonprofit, etc.) using the FNS-418 form. To add context on these trends, we also analyzed and compared the number of SFSP lunches served in July with the number of free and reduced-price lunches served to children in March through the

¹We interviewed officials from the following organizations: Boys and Girls Club of America, Catholic Charities USA, National Child and Adult Care Food Program Sponsors Association, Feeding America, Feed the Children, Food Research & Action Center, Illinois Hunger Coalition, National League of Cities, National Recreation and Park Association, Share Our Strength, Texas Hunger Initiative, and Young Men's Christian Association (YMCA) of the USA.

²Our review focused on the 10 years from fiscal year 2007 through fiscal year 2016; however, we noted preliminary data from fiscal year 2017 to provide the most up-to-date information available at the time of this report.

³These data include meals served in the 50 states, American Samoa, the Commonwealth of North Marina Islands, the District of Columbia, Guam, Puerto Rico, the U. S. Virgin Islands, and U. S. Department of Defense's military bases. We only included data from the 50 states and the District of Columbia and for the months of May, June, July, and August in our review. As previously noted, our review focused on the 10 years from fiscal year 2007 through fiscal year 2016; however we noted preliminary data from fiscal year 2017 to provide the most up-to-date information available at the time of this report.

National School Lunch Program (NSLP), the largest child nutrition assistance program, from fiscal year 2007 through fiscal year 2016.⁴ Each month, states report to FNS the number of meals served through the NSLP using the FNS-10 form.⁵ To assess the reliability of SFSP and NSLP data, we (1) performed electronic testing of relevant data elements, (2) reviewed existing information about the data and the system that produced them, and (3) interviewed agency officials knowledgeable about the data. Electronic testing included, but was not limited to, checks for missing data elements, duplicative records, and values outside a designated range or valid time period. We determined that these data were sufficiently reliable to identify the number of SFSP meals served and assess change over time.

To further examine what is known about participation in the SFSP, we also reviewed FNS's data on estimates of children's participation in the program and determined that these estimates have been calculated inconsistently and are unreliable. To assess the reliability of these data, we reviewed documentation about the estimates, interviewed FNS officials, and asked states about the estimate calculation in our survey. As described in our findings, FNS does not collect data on the number of children participating in the SFSP. Instead, FNS relies on states' estimates of children's participation, which are based on other data reported by sponsors, such as the number of meals served and meal service days in July.

To address our second objective about other programs that help feed children in the summer, we reviewed FNS's estimate of the number of meals served through the NSLP's Seamless Summer Option in fiscal year 2016. FNS does not collect data on the number of meals served through the Seamless Summer Option. Instead, FNS annually estimates the number of Seamless Summer Option meals served nationally by aggregating the number of free and reduced-price breakfasts, lunches,

⁴The SFSP and NSLP data include meals served in the 50 states, American Samoa, the Commonwealth of North Marina Islands, the District of Columbia, Guam, Puerto Rico, the U. S. Virgin Islands, and U.S. Department of Defense's military bases. For this review, we focused our analysis on data from the 50 states and the District of Columbia. We used the month of July for the SFSP and the month of March for the NSLP because, according to FNS officials, the highest SFSP participation generally occurs in July and the highest NSLP participation generally occurs in March. FNS officials told us they generally compare these two months when comparing these two programs.

⁵The information reported for the NSLP includes the number paid, free, and reduced-price meals by meal type (e.g., lunches and snacks) for each month.

and snacks served through the School Breakfast Program (SBP) and NSLP in July. As previously noted, states report these data monthly to FNS.⁶ Although FNS does not know the actual number of meals served through the Seamless Summer Option, agency officials told us they believe the number of summer meals provided through the NSLP is small relative to the number of meals served through the Seamless Summer Option during the summer months. They noted that their use of July NSLP data to estimate the Seamless Summer Option meals likely overestimates the number of these meals for July and underestimates the number of these meals for the entire summer. To assess the reliability of the July NSLP data, we (1) performed electronic testing of relevant data elements, (2) reviewed existing information about the data and the system that produced them, and (3) interviewed agency officials knowledgeable about the data. Electronic testing included, but was not limited to, checking for missing data and data that fell outside of a reasonable range or date for the specific time period (July). We determined that these data were sufficiently reliable to describe the number of meals served.

In addition to the data FNS requires states to report, some states collect summer meals data at the meal site level and we used such data from the three selected states to address all three objectives. For objective one, to examine the number of meals served and days of operation at each summer meals site, we analyzed site-level data for 2 months from summer 2016, including the month with the largest number of SFSP meals served in each selected state: Arizona (June and July 2016), Illinois (July and August 2016), and Massachusetts (July and August 2016). Each state also provided us with data on the number and types of meals served at each SFSP site, the site location, and the duration of time each site operated over the summer. Using the data provided by the states, we calculated the average daily attendance (ADA) for each meal site based on FNS's instructions and examined the variation in ADA across sites and months. For our second objective on other programs, these selected states provided similar site level data for the state's Seamless Summer Option sites, if applicable.⁷ We assessed the reliability of these data by (1) performing electronic testing of relevant data

⁶The information reported for the NSLP and SBP includes the number paid, free, and reduced-price meals by meal type (e.g., snacks and breakfasts) for each month.

⁷School food authorities provided summer meals through the Seamless Summer Option in Arizona and Illinois, but not in Massachusetts, based on our analysis of data provided by these states.

elements, (2) reviewing existing information about the data and the system that produced them, and (3) interviewing agency officials knowledgeable about the data. We determined that the data were sufficiently reliable for the purposes of this report.

For both our second objective on other programs and third objective about challenges in providing summer meals to children, we also examined meal site availability in the three selected states by mapping the locations of meal sites. On the maps, we included fiscal year 2016 area eligibility data from FNS's Capacity Builder mapping tool, as provided by FNS.⁸ The site area eligibility data from FNS's Capacity Builder is based on the U.S. Census Bureau's 5-Year American Community Survey (ACS) estimates of children ages 0-12 and 0-18 eligible for free and reduced-price meals by Census block group and tract.⁹ According to FNS officials, FNS obtains 5-Year ACS estimates annually from the U.S. Census Bureau and updates its site area eligibility in the Capacity Builder accordingly. For fiscal year 2016, FNS used 2009-2013 ACS data to identify and include site area eligibility in its Capacity Builder.¹⁰

Survey

To help inform all of our research objectives, we conducted a survey of the state agencies that oversee the SFSP in the 50 states and the District of Columbia. We administered our web-based survey between August and October 2017 and received 100 percent response rate. The survey included questions about participation in the SFSP, factors critical to the overall success of the SFSP, outreach efforts, federal technical assistance, barriers and challenges in providing summer meals, alternative summer feeding models, the NSLP's Seamless Summer Option and the federal Summer Electronic Benefit Transfer for Children

⁸FNS's Capacity Builder is a mapping tool that allows users to search for summer meal sites from the previous summer by zip code, adding "layers" of information, such as area eligibility data.

⁹States are responsible for determining meal site eligibility and sponsors may demonstrate area eligibility using other forms of data, such as school data. Area eligibility determinations made using either school or census data must be re-determined periodically. USDA, Food and Nutrition Service, *Area Eligibility in Child Nutrition Programs*, Memo code SP 08-2017, CACFP 04-2017, SFSP 03-2017 (Alexandria, Virginia: December 1, 2016).

¹⁰According to FNS officials, the 2009-2013 ACS data estimates were the most recently available from the U.S. Census Bureau for fiscal year 2016.

demonstration, and nonfederal programs that provide children of low-income households with meals during the summer months. The survey also requested data on SFSP sites participating in the program in fiscal year 2016 and the method state agencies used to calculate ADA in SFSP on the FNS-418 form in fiscal year 2016.

Because this was not a sample survey, there are no sampling errors. However, the practical difficulties of conducting any survey may introduce nonsampling errors, such as variations in how respondents interpret questions and their willingness to offer accurate responses. We took steps to minimize nonsampling errors, including pretesting draft instruments and using a web-based administration system. Specifically, during survey development, we pretested draft instruments with SFSP staff from four states (Michigan, New Mexico, North Carolina, and South Dakota) in May 2017. We selected the pretest states based on information provided by officials from FNS's regional offices and national organizations involved in summer meals about state administration of summer meals programs, with the goal of selecting a group of states with varied experiences. In the pretests, we were generally interested in the clarity, precision, and objectivity of the questions, as well as the flow and layout of the survey. For example, we wanted to ensure definitions used in the surveys were clear and known to the respondents, categories provided in close-ended questions were complete and exclusive, and the ordering of survey sections and the questions within each section were appropriate. We revised the final survey based on pretest results. Another step we took to minimize nonsampling errors was using a web-based survey. Allowing respondents to enter their responses directly into an electronic instrument created a record for each respondent in a data file and eliminated the need for and the errors associated with a manual data entry process. We did not fully validate specific information that states reported through our survey.

Site Visits

To help inform all of our objectives and gather information about the SFSP directly at the local-level, we conducted 30 site visits in three states: Arizona (12 sites), Illinois (8 sites), and Massachusetts (10 sites) between June and July 2017, and interviewed organizations involved with the SFSP in each site visit state. We used U.S. Census Bureau data to select states and local areas within those states based on a high proportion of children in poverty, a mix of urban and rural locations, as well as a mix of sponsor and site type and diverse locations. We visited a wide variety of site locations including, but not limited to, schools, parks, community recreation areas, and libraries.

At each SFSP site, we gathered information on local level factors related to SFSP participation and administration by interviewing the organization sponsoring the site, the site operators and staff, and those participating at the site using semi-structured questions. While interviewing SFSP sponsor organizations, we collected information on the sponsors' roles in the SFSP, characteristics of the sites the organizations sponsored, outreach efforts, any challenges or barriers to SFSP administration and any efforts to address such challenges, relationships with the state agencies that administer the SFSP, relationships with FNS (national and regional offices), and the availability of nonfederally funded programs that provide meals to low-income children over the summer. During the interviews with site operators and staff, we collected information about site operation (e.g., site operating days, meals offered, etc.), any challenges to providing SFSP meals to children and any efforts to address such challenges, outreach efforts, and the proximity of the next closest meal site. The information we collected from those participating at the sites included their perspectives on the SFSP food, site food consumption habits, ease of travel to the site, and access to other SFSP sites. At each site, we made observations as to how the food was provided to the children, food consumption and waste, the approximate age range of the children being served, and availability of programs or activities (e.g., recreational sports).

Using semi-structured questions, we also interviewed the state agencies responsible for administering the SFSP in the site visit states to gather further information on how the SFSP is administered in each state, statewide participation in the program, related data collection activities, any challenges to administering the program and any efforts to address such challenges, related outreach efforts, alternative meal delivery models being employed by SFSP sponsors, FNS guidance or technical assistance, and the availability of nonfederally funded programs that provide meals to low-income children over the summer.

Appendix II: Select Questions and Responses from GAO's Summer Food Service Program (SFSP) Survey

Table 2: Survey Question 2: Does your state agency experience any challenges with administering the SFSP?

Prompt	Number of States Reporting
Yes	41
No	9
No Response	1

Source: Responses to GAO's survey of state agencies responsible for administering the Summer Food Service Program. | GAO-18-369

Table 3: Survey Question 2A: How challenging are the following factors to state administration of the SFSP?

Prompt	Extremely challenging	Very challenging	Moderately challenging	Slightly challenging	Not at all challenging	Not applicable	Don't know	No response
Limited state agency capacity (i.e., staffing)	10	12	5	11	2	1	0	10
Limited overall state budget	6	3	9	2	6	14	1	10
Limited amount of state funding for SFSP administration	3	3	2	2	4	25	2	10
Limited amount of federal funding for SFSP administration	12	9	6	3	8	2	1	10
Identifying potential sponsors	3	8	14	8	6	2	0	10
Conducting outreach to potential sponsors	4	5	15	11	5	1	0	10
Retaining sponsors and sites over multiple summers	2	4	14	14	5	2	0	10
Identification and confirmation of site area eligibility	1	2	10	16	10	2	0	10

**Appendix II: Select Questions and Responses
from GAO's Summer Food Service Program
(SFSP) Survey**

Prompt	Extremely challenging	Very challenging	Moderately challenging	Slightly challenging	Not at all challenging	Not applicable	Don't know	No response
Completing federal requirements for monitoring of SFSP sponsors	6	7	13	8	6	0	0	11
Other ^a	6	5	3	1	0	13	4	19

Source: Responses to GAO's survey of state agencies responsible for administering the Summer Food Service Program (SFSP). | GAO-18-369

^aFor states that indicated there were other challenge(s), we provided an open-ended question that requested a description of the challenge(s) and 14 states provided descriptions of other challenges, not shown here.

Table 4: Survey Question 2B: How challenging are the following local-level factors to increasing children's participation in the SFSP?

Prompt	Extremely challenging	Very challenging	Moderately challenging	Slightly challenging	Not at all challenging	Don't know	No response
Lack of sponsors to meet summer meal needs	3	9	16	11	2	0	10
Some communities where low-income children reside are not area eligible	7	9	14	8	2	1	10
Distance to summer meal sites in rural areas results in low child turnout, which makes site sponsorship not financially viable for sponsors	22	7	7	2	1	2	10
Options in rural areas to transport children to summer meal sites are limited	22	9	6	1	1	2	10
Limited days of operation of summer meal sites	4	11	12	12	2	0	10
Ensuring sufficient staff supervision of children at summer meal sites	2	6	16	10	3	4	10

**Appendix II: Select Questions and Responses
from GAO's Summer Food Service Program
(SFSP) Survey**

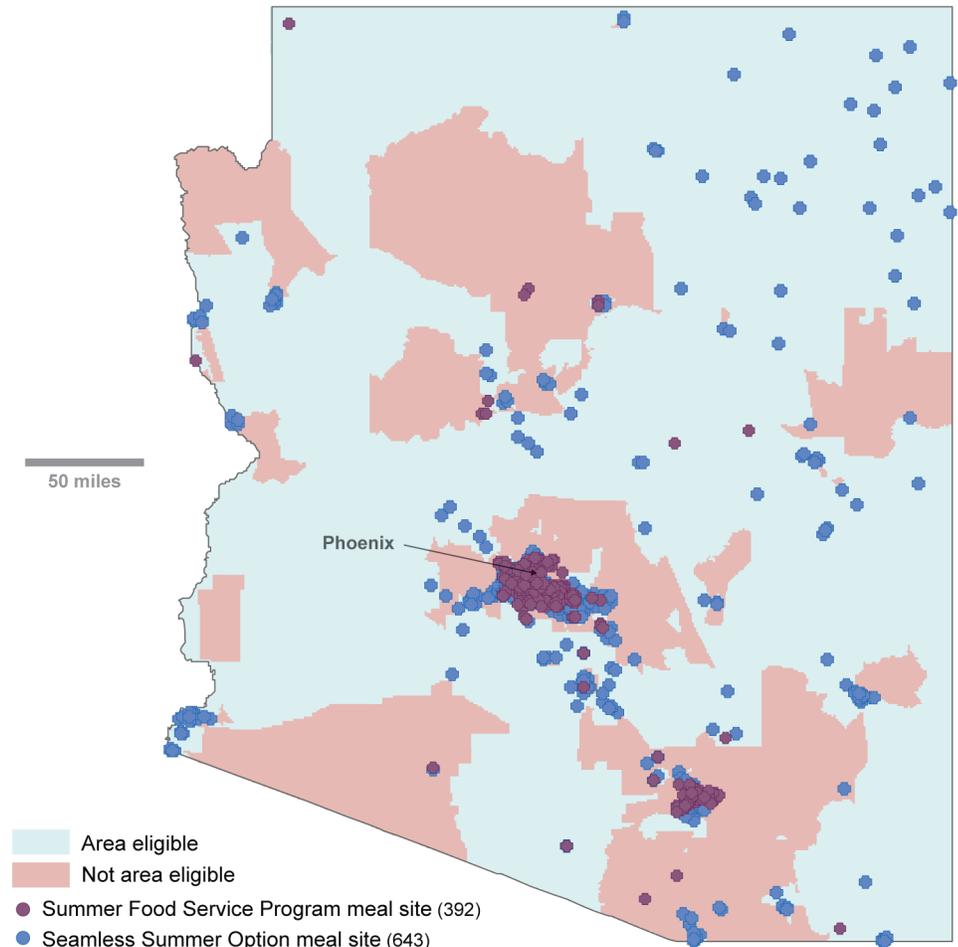
Prompt	Extremely challenging	Very challenging	Moderately challenging	Slightly challenging	Not at all challenging	Don't know	No response
Ensuring summer meal sites are in safe locations	0	7	10	14	7	3	10
Lack of awareness of the summer meal sites among children and families	7	12	15	6	1	0	10
Lack of awareness of the summer meal program among potential sponsors or sites	4	10	13	13	0	1	10
Sponsors not following program requirements	6	3	19	11	2	0	10
Poor meal quality at summer meal sites	3	6	9	16	7	0	10
Inadequate meal reimbursement amounts	4	13	6	10	7	1	10
Limited youth and teen participation at summer meals sites	8	10	13	8	1	1	10
Difficulty ensuring meal sites are available throughout the summer due to unexpected changes in school calendars	3	3	11	11	10	2	11
Other ^a	5	2	1	0	1	16	26

Source: Responses to GAO's survey of state agencies responsible for administering the Summer Food Service Program (SFSP). | GAO-18-369

^aFor states that indicated there were other challenge(s), we provided an open-ended question that requested a description of the challenge(s) and 8 states provided descriptions of other challenges, not shown here.

Appendix III: Area Eligibility and Summer Meal Sites in Selected States

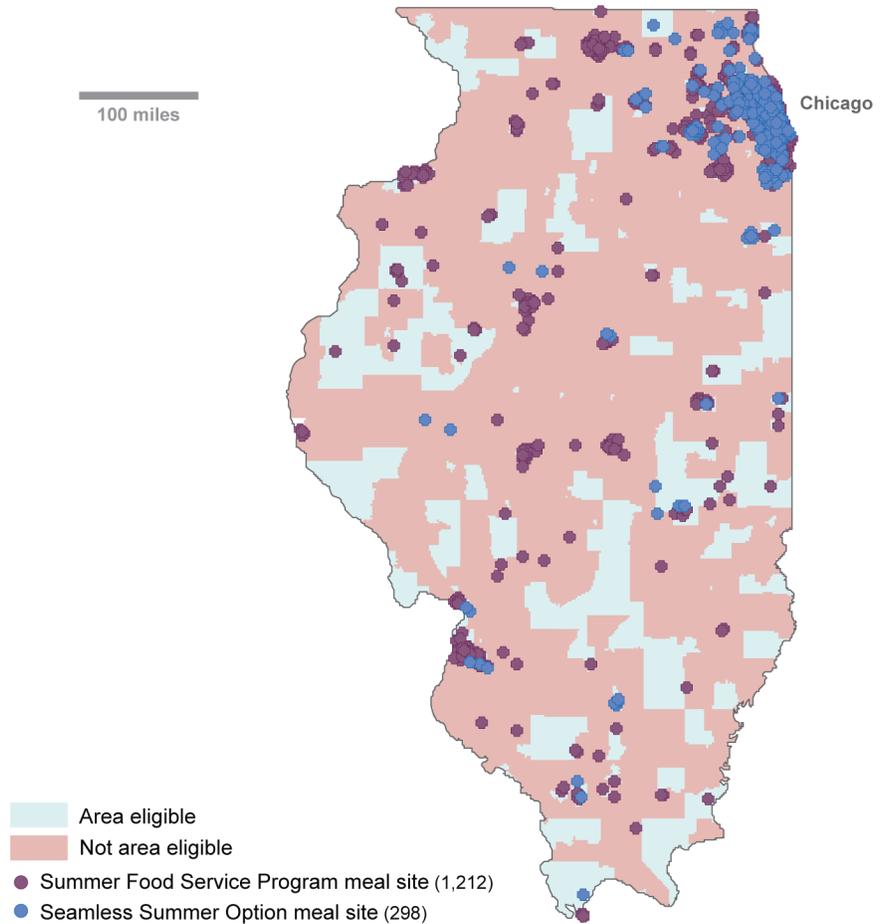
Figure 10: Area Eligibility and Summer Meal Sites for the Month with the Greatest Number of Meals Served in Arizona, June 2016



Sources: GAO map based on fiscal year 2016 meal site data from Arizona on the Summer Food Service Program (SFSP) and the National School Lunch Program's Seamless Summer Option meal sites for the month with the greatest number of meals served in Arizona (June) and area eligibility data from the Census Bureau's American Community Survey provided by Food and Nutrition Service for fiscal year 2016. MapInfo (map). | GAO-18-369

Note: This figure shows area eligibility as determined by the Food and Nutrition Service's Capacity Builder mapping tool, which is based on the U.S. Census Bureau's American Community Survey estimates of children eligible for free and reduced-price meals by Census block group and tract. However, states and sponsors may use other data to determine whether sites are "area eligible." In addition, certain types of sites may participate in the SFSP and Seamless Summer Option even if they are not area eligible.

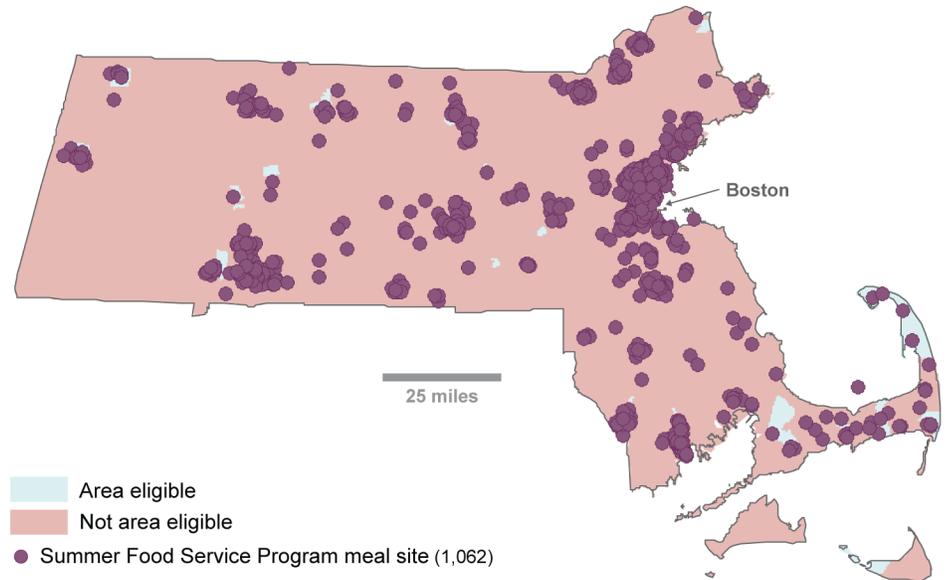
Figure 11: Area Eligibility and Summer Meal Sites for the Month with the Greatest Number of Meals Served in Illinois, July 2016



Sources: GAO map based on fiscal year 2016 meal site data from Illinois on the Summer Food Service Program (SFSP) and the National School Lunch Program's Seamless Summer Option meal sites for the month with the greatest number of meals served in Illinois (July) and area eligibility data from the Census Bureau's American Community Survey provided by Food and Nutrition Service for fiscal year 2016. MapInfo (map). | GAO-18-369

Note: This figure shows area eligibility as determined by the Food and Nutrition Service's Capacity Builder mapping tool, which is based on the U.S. Census Bureau's American Community Survey estimates of children eligible for free and reduced-price meals by Census block group and tract. However, states and sponsors may use other data to determine whether sites are "area eligible." In addition, certain types of sites may participate in the SFSP and Seamless Summer Option even if they are not area eligible.

Figure 12: Area Eligibility and Summer Meal Sites for the Month with the Greatest Number of Meals Served in Massachusetts, July 2016



Sources: GAO map based on fiscal year 2016 meal site data from Massachusetts on the Summer Food Service Program (SFSP) meal sites for the month with the greatest number of meals served in Massachusetts (July) and area eligibility data from the Census Bureau's American Community Survey provided by Food and Nutrition Service for fiscal year 2016. MapInfo (map). | GAO-18-369

Note: In summer 2016, Massachusetts had SFSP meal sites but no National School Lunch Program Seamless Summer Option sites. This figure shows area eligibility as determined by the Food and Nutrition Service's Capacity Builder mapping tool, which is based on the U.S. Census Bureau's American Community Survey estimates of children eligible for free and reduced-price meals by Census block group and tract. However, states and sponsors may use other data to determine whether sites are "area eligible." In addition, certain types of sites may participate in the SFSP and Seamless Summer Option even if they are not area eligible.

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Kathryn A. Larin, (202) 512-7215 or larink@gao.gov

Staff Acknowledgments

In addition to the contact named above, Rachel Frisk (Assistant Director), Claudine Pauselli (Analyst-in-Charge), Melissa Jaynes, and Matthew Nattinger made key contributions to this report. Also contributing to this report were Susan Aschoff, Sarah Cornetto, Ying Long, Jean McSween, Mimi Nguyen, Almeta Spencer, and Ashanta Williams.

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