

School's Out....

....Who Ate?

A Report on Summer Nutrition in California

June 2004



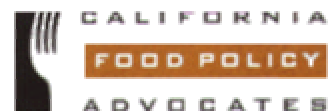
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Matthew Sharp

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ACKNOWLEDGMENTS

This report was prepared by California Food Policy Advocates using data provided by the California Department of Education and United States Department of Agriculture. Several CFPA staff participated in assembling this report, including Kenneth Hecht, George Manalo-LeClair and Jessica Reich. We are thankful to our funders: Share Our Strength, Mazon: A Jewish Response to Hunger, The California Endowment, Wallis Foundation, and Community Food and Nutrition Program.

CFPA is glad to have the opportunity to applaud the various program administrators whose commitment to expanding summer nutrition in California is critical to all our ongoing efforts. Special thanks to a number of staff at California Department of Education's Nutrition Services Division, especially Carolyn Brown, Melissa Garza and Ronna Jakobitz, and to the USDA, Food and Nutrition Service, Western Regional Office, most notably Timothy Thole.

Similarly, establishing new summer lunch sites, increasing participation and conducting effective advocacy all depend heavily on committed local community partners. Among our many great allies throughout the state, several summer lunch advocates' efforts appear throughout this report and are worthy of specific recognition: David Goodman, Edie Jessup, Gary Joseph, Ellen Stroud and Kim Wade.

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June 2004



Dear Friends:

California Food Policy Advocates wants to take advantage of this annual report on summer nutrition programs to highlight – and to celebrate – three wonderful summer food policy developments – that should result in more streamlined administration for sponsors and site operators and higher participation among children who need healthy meals and snacks while school is out.

First, state and federal nutrition program administrators have agreed to five important policy clarifications that will simplify and improve site operations for California program sponsors:

- ✍ Parents are encouraged to be in summer eating areas, particularly so they can assist their younger children to eat.
- ✍ Eating areas should be flexible, to accommodate larger numbers of children.
- ✍ The notorious “traveling apple” and other non-perishable foods may be taken away from the eating area.
- ✍ Sponsors are encouraged to use state school free and reduced-free data to qualify their sites.
- ✍ Multiple sites in proximity to one another are permitted under most circumstances.

Each of these changes is shown in full in Appendix B. to this report.

Within the past few days, Congress has completed its reauthorization of the child nutrition programs, and we are pleased to report that reauthorization contains two features that will let sponsors eliminate more paperwork and serve more children. First, Congress has made the Summer Food Seamless Waiver a permanent feature of the Summer Food Service Program. The Seamless Waiver, first developed and piloted in Alisal Union School District (Salinas) and Fresno

Unified School District, streamlines SFSP for school sponsors by permitting them to operate SFSP under the more flexible rules and regulations for the National School Lunch Program. The waiver has been extremely popular among schools for which it simplifies administration, eliminating daunting paperwork duplication and expense.

Also in reauthorization, California has been authorized to develop a similar seamless waiver for community-based sponsors (all but schools). Starting as soon as July 1, 2004, this new pilot will permit non-school agencies and organizations - - park and recreation departments and other government agencies, churches, clubs and other nonprofits -- that operate SFSP program during vacation periods to carry on snack programs throughout the school year - and to do so as an integral part of their SFSP program. These sponsors no longer will have to cope with an entirely different set of rules from a different food program once their children return to school. As has proved true with the school-based Seamless Waiver, this new community-based waiver should streamline program administration and eliminate excessive paperwork (and expense) from the program.

One final note: this annual report, "School's Out...Who Ate," typically contains year-to-year trend data on summer nutrition in California, presented separately for each county in the state. Unfortunately, these data are not yet available. We are publishing this report now, because we think it important to broadcast the other messages contained in the report. As soon as the county data are available, we will post them on our web site www.cfpa.net. In the meantime, if you want to locate current summer food sites operating in your county, that information already is on our web site.

Please watch our Weekly Alerts for summer lunch program developments.

Thanks.

A handwritten signature in black ink, appearing to be the name 'Matt', is located below the 'Thanks.' text.

INTRODUCTION

CFPA is pleased to publish its annual “School’s Out...Who Ate?” report. Over the past decade, local advocates and program operators, as well as state and federal administrators and observers, have used this report to identify opportunities to increase summer nutrition. It remains our vision that all low-income children should be able to eat summer meals. These pages chart progress towards that vision, while noting several substantial obstacles and opportunities to respond to them.

This year’s “School’s Out...Who Ate?” is written with particular emphasis on school-based lunches, given that over half a million meals are served each July through summer school and year-round schools. This report is released just as many sites open for the summer. With the flurry of activity involved in launching this year’s programs, observers and advocates are reminded of the ongoing challenge to ensure adequate funding for local services, including summer nutrition, in light of federal tax and budget decisions.

Why California Needs Summer Lunch

1. Persistent Hunger Amidst Prosperity

Despite boasting the world’s sixth largest economy, California is home to millions of families struggling to make ends meet. More than eight million Californians are touched by hunger: they are food insecure or live with an adult who suffers food insecurity.¹ Hunger in California is almost always an income problem; poverty begets hunger. California’s extremely high cost of living exacerbates families’ persistent anxiety about meeting their nutritional needs.

A two-parent California family with one employed parent needs an annual income of \$40,848, equivalent to an hourly wage of \$19.64, to secure a modest standard of living.² That includes resources with which to purchase adequate nutrition for the family. With the state’s median hourly wage at \$14/hour, many families struggle to put enough good food on the table. Moreover, despite rent consuming more than half their monthly budget, low-income families spend at

¹ Analysis of 2001 California Health Interview Survey data, CFPA “Touched By Hunger”, October 2003.

² California Budget Project, “Making Ends Meet”, October 2003.

least 20% of their household budget on food, making the summer months—when their children often cannot participate in the National School Lunch Program—an especially challenging time for their families’ food and other basic needs.

2. Rising Obesity Rates

At the same time that so many of our neighbors’ children face hunger and food insecurity, nearly one-third of all California’s youngsters have been caught in the obesity epidemic afflicting our state and nation. Statewide, 26.5% of children in grades 5, 7, and 9 in California are overweight, and nearly 40% are unfit.³

Just as families with insufficient incomes may experience hunger and food insecurity, they may also experience overweight or obesity. With so many children overweight, this health crisis touches every community and school district in our state. For low-income families, poor access to nutritious and affordable food, along with restricted opportunities for physical activity, contributes to and aggravates obesity and overweight. For example, energy-dense foods (such as a typical high-fat, high-calorie fast food meal) are frequently less expensive and more readily available in many neighborhoods than fresh produce, whole grains, low-fat dairy and other highly nutritious choices⁴.

During the school year, the federal school meal programs help to shield low-income students from reliance upon the inexpensive, energy-dense convenience foods that result in poor nutritional intake and the formation of dangerous long-term dietary habits. During the summer, of course, the regular school-year-based nutrition programs are unavailable, increasing the likelihood that poverty will translate into unhealthy diets.

Fortunately, the federally-funded summer nutrition programs provide an important antidote to obesity.

A Response: Summer Lunch

Free, federally funded, nutritious lunches, and snacks, summer meals are a critically important obesity prevention tool during summer months, especially

³ Analysis of California Department of Education data by California Center for Public Health Advocacy, 2003.

⁴ American Journal of Clinical Nutrition, “Income and Obesity,” Drewnowski and Specter, January 2004.

when coupled with activity and recreation programs. The federal food programs all require sponsors to observe the nutrition standards contained in the Guidelines for Healthy Americans, thus assuring that meals and snacks will provide the essential nutrients and discourage obesity.

City and county parks programs, Boys and Girls Clubs, and local programs at schools, churches and community centers all provide safe, supervised environments for children to enjoy fun and rigorous physical activity. With the federal food programs providing nutritious meals alongside the opportunities for exercise, summertime can help shape healthy behaviors for California children, providing a useful remedy to hunger as well as obesity.

There are two parallel programs that aim to feed low-income children during the summer.

First, in many schools the **National School Lunch Program (NSLP)** continues to operate in the summer months at year-round schools and during summer school. Due to extreme over-crowding in many California schools, children's "summer" can often consist of three week breaks in November, February and April. There are 1,591 year-round schools in 193 districts with a total enrollment of 1,391,573 students in California. The nutritional needs and non-summertime hunger gaps created by year-round schools were the subject of CFPA's 1999 report: *The Sleeping Giant: Outlook on Year Round Summer Food*. The report, which is available on CFPA's web site, documents the huge underutilization of federal food programs for this group of children, even more severe than for the children who are on vacation during the traditional summer break.

State law requires schools to serve meals during summer school sessions. However, this requirement can be waived if any two of the following conditions are met:

- ✍ The summer school session is less than 4 hours in duration and is completed by noon.
- ✍ Less than 10% of the needy pupils are there for more than three hours.
- ✍ Serving meals would result in demonstrable financial loss to the district.
- ✍ A Summer Food Service Program serves the school attendance area.

Because of the availability of these waivers, there is no guarantee that nutrition programs will operate in connection with summer school; in fact, a distressing number of hungry children lose access to summer meals because their school districts choose to take advantage of these waivers. Over the past year,

California Department of Education has strenuously discouraged schools from “opting-out” of their nutrition obligations, increasing the likeliness that more meals will be served as part of summer school this year. More data is needed to evaluate the impact of recent, budget-related summer school cuts on access to adequate nutrition.

An exciting policy development, originally developed as pilot programs in Salinas and Fresno in 2000 and 2001, allows schools to continue to operate summer meal programs under NSLP rules, while serving everyone a free meal during summer. This “seamless waiver” was recently made permanent national policy, as discussed later in this report. Broader adoption of seamless summer feeding encourages schools to operate under reduced administrative burdens, enabling sponsors to feed more children with less red tape, and more easily sponsor community-based sites.

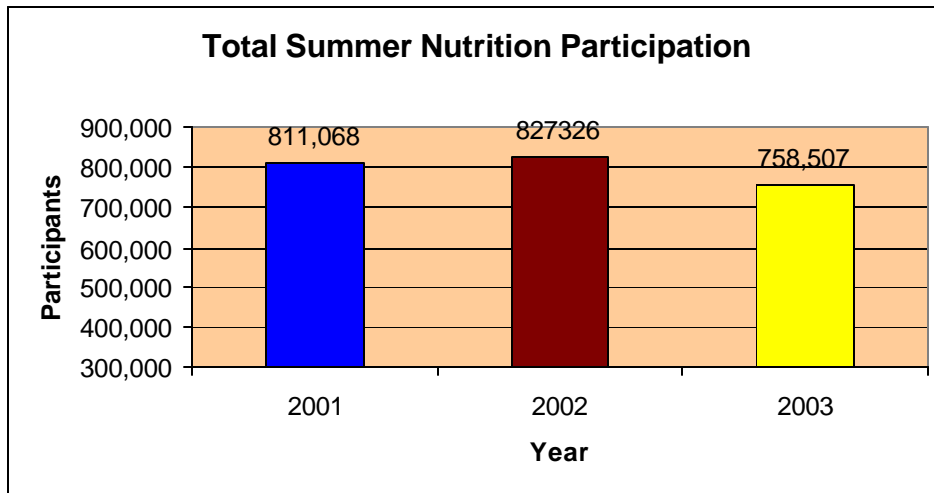
The second federal food program, originally designed for children on vacation from schools with a traditional June through August summer break, or for children who do not participate in summer school, is the **Summer Food Service Program (SFSP)**. SFSP sponsors receive payments from USDA for serving healthy meals and snacks to children and teenagers, 18 years and younger, at approved sites in low-income areas⁵. Half of California’s 1500 SFSP community-based sites operate as camps or closed sites serving a targeted audience, like Upward Bound, while the rest are at parks, recreation centers, churches and community agencies. Schools can continue to operate SFSP, though the seamless waiver predictably (and properly) has lured most school sponsors to continue NSLP during summer months.

Visit Appendix D for a detailed history of summer nutrition.

⁵ Areas where 50% or more children attending local schools are certified eligible for free or reduced price school meals. Free or reduced price meals are available to children living in households with incomes below 185% of the Federal Poverty Level, under \$28,231 annual income for a family of three.

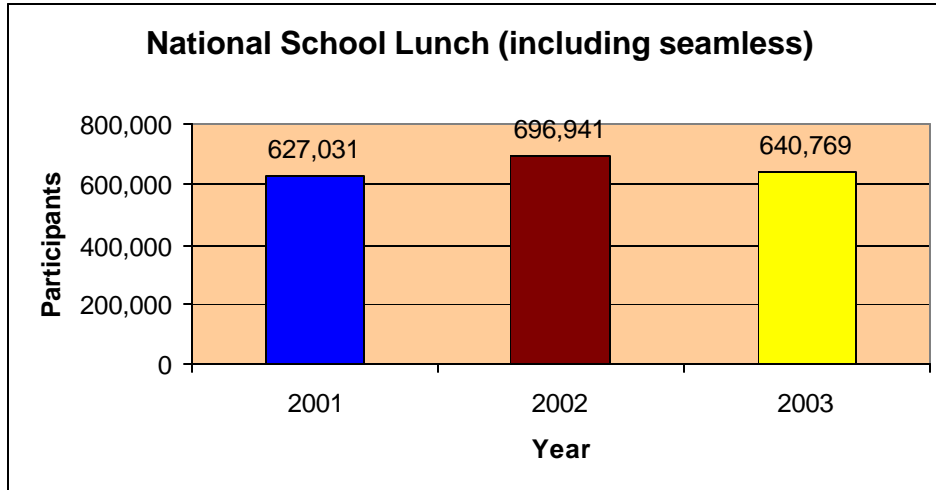
DATA: WHO ATE LUNCH IN JULY 2003?

The following graph provides a snapshot of overall summer nutrition trends, comparing participation in all the summer nutrition programs – SFSP, seamless, NSLP – during recent summers. These charts reflect average daily participation in July: total meals served in July divided by service days, not an actual head count on a particular day in July. While many communities may have fed more children on any given day, they likely did so for fewer weeks, resulting in lower overall participation.

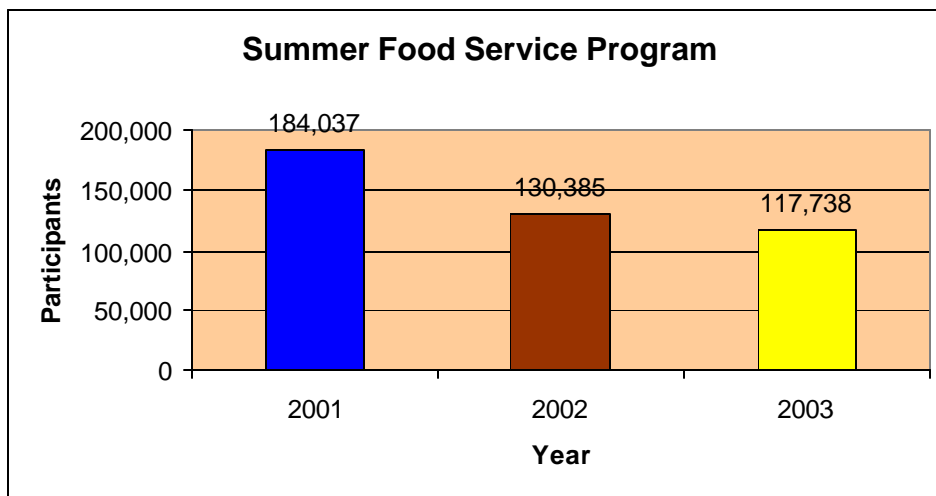


This chart shows a 9% decline, from 827,326 children participating on a daily basis during July 2002 to 758,507 children in July 2003. As the next graph shows, this decrease was driven primarily by a corresponding 9% reduction of in National School Lunch Program meals served to summer school students in July 2003. Approximately 107,000 of these meals were provided under the seamless waiver.

Most program observers attribute this decline to shorter summer school sessions across the state; fewer days result in fewer total meals served, lowering the daily average for the entire month of July. Serious budget cutbacks forced many school districts to consolidate summer school sites and shorten the duration of programs.



As many traditional school-based SFSP sites shifted to offering meals under the seamless waiver in 2003, SFSP meals declined 11% on the average day in July 2003 to 117,738.



Appendix A doesn't yet, but will provide more detailed, county-by-county review of trends across California. Once the data are available, they will be posted on our website and in the report. Most notable observations include:

- ✍ Numerous smaller, remote counties continued to serve very few – if any – children during summer months (12 counties served fewer than 200 kids).
- ✍ Large counties with urban districts saw summer school shrink significantly (Alameda, Sacramento, San Diego, Santa Barbara, among others).
- ✍ Several counties served high numbers of low-income children during summertime (San Joaquin, Santa Cruz, Stanislaus).

UPDATES: RECENT POLICY AND PROGRAM IMPROVEMENTS

In March 2003, over 3 million California school children were certified eligible for a free or reduced price meals at school. Since only 750,000 ate a federally funded lunch in July 2003, three-quarters of California children who are eligible did not receive a nutritious lunch during summer months. Increased participation will not only provide essential nutrition to children who need it, but it also will draw down enormous federal resources for California and support local enrichment and recreational programs across the state. Yet expanding summer food programs is hampered by several barriers:

- ✍ Excessively complex administration.
- ✍ Inadequate number of sites and ineffective recruitment of additional sites.
- ✍ Insufficient marketing to attract more children.

In order to ease **complex program administration**, advocates and sponsors have successfully pursued changes at the federal and state levels to simplify and liberalize program operations, while preserving basic program integrity.

Federal Updates

The reauthorization of the federal child nutrition programs, including summer nutrition provisions, passed the House in April 2004 and the Senate in June 2004. The President's signature on June 30th, cements child nutrition program rules and funding levels in place through 2007.

In 2002, to gather California-specific policy recommendations for reauthorization of the child nutrition programs, several hundred child nutrition advocates and administrators from across California participated in a CFPA web-based survey to identify priorities for reauthorization. Additionally, Washington DC-based USDA officials visited San Francisco to hear Californians' legislative priorities for reauthorization. To improve summer nutrition, consensus emerged in California around a few key policy changes:

1. Make the Summer Seamless Waiver for school districts permanent.
2. Allow a simpler reimbursement structure (meals x rate).
3. Eliminate separate, complicating and sometimes even conflicting

requirements between SFSP and CACFP.

Unable to secure sufficient additional funds to expand federal investments in child nutrition, reauthorization has largely been a missed opportunity to capture the remarkable public interest in obesity-prevention and continuing concern over increasing hunger rates.

Two exciting changes were made to summer nutrition programs, as part of 2004 Child Nutrition Reauthorization. Advocates believe these two provisions have significant potential to boost summer feeding participation.

- ✍ **California Year-Round Pilot.** This California-specific provision enables community agencies to administer year-round snack programs under SFSP (without having to switch over to CACFP during the school year). This pilot will dramatically streamline administration for community sponsors, drawing down federal snack reimbursements and assuring healthier food that satisfies federal nutrition guidelines for hundreds, potentially one thousand non-school sites, year-round. (See Appendix E for details)
- ✍ **Seamless Waiver Made Permanent.** The original, school-based “seamless” summer lunch waiver, authorizing schools to operate all their summer food programs under the National School Lunch Program, has been made a permanent feature of the program.

Other summer changes were included in reauthorization, but were not extended to California sponsors. Advocates and administrators are poised to launch the California Year-Round Pilot Program and to use the permanent seamless program as a way to grow school-community partnerships during summer months.

State Updates

As sponsors know all too well, SFSP is not just a summer job, but a year-round vocation (some would say “calling”) for their agencies. September through April can be a busy time, preparing claims, meeting with vendors, identifying new sites, training staff and attending meetings with advocates. In addition to USDA Western Regional Office-sponsored calls to plan for summer 2004, *at least* seven California communities – Fresno, Santa Cruz, Santa Rosa, San Francisco, San

Jose, San Luis Obispo, Orange counties - held summer lunch roundtables, listening sessions and planning meetings over the past year.

One particularly important and productive meeting occurred in late March 2004, when representatives from many of those local conversations met in Sacramento with officials from USDA and CDE Nutrition Services Division to identify opportunities to expand summer nutrition in 2004. The **most substantial outcomes**, however, included plans to address common misperceptions among SFSP sponsors and observers statewide. These clarifications update and illuminate program regulations to ease administration and operations for sponsors. The following changes are detailed in the USDA Management Bulletin attached to this report in Appendix B.

1. Allow children to take specific safe foods off-site, such as an apple.
2. Confirm eligibility for small children who cannot carry their own tray.
3. Encourage their parents to assist with feeding.
4. Simplify site eligibility determination using education data on the web.
5. Encourage greater flexibility in establishing designated feeding areas.
6. Allow sites to operate in closer proximity.

These administrative actions respond directly to sponsors' complaints that have been articulated year after year. By removing significant operational hurdles, these actions ease sponsorship burdens and encourage program expansion and, therefore, participation by needy children. With effective implementation of these provisions underway in nearly every other state, these changes represent an important administrative update to California's SFSP.

Additionally, the March meeting yielded agreements for agency reviewers and local advocates to cooperate more closely on providing technical assistance and mentoring to program sponsors. Also, Nutrition Services Division will distribute more SFSP information (applications, updates, forms) earlier in the winter and via email to sponsors.

Local Updates

In order to **recruit additional sites**, local advocates and community partners convened numerous meetings in 2003 and 2004 to identify gaps in service, likely vendors, potential sponsors and sites and to establish new partnerships. These planning meetings occurred in a variety of settings and included a range of

participants, from parent volunteers to government administrators. The threat of summer hunger can unify a community. This section of the report will highlight a few particularly successful community approaches to closing local summer nutrition gaps.

Santa Rosa The Redwood Empire Food Bank serves hungry families across Sonoma County. Over the recent winter and spring, Redwood Empire hosted three meetings to engage a small group of key local nonprofit leaders and school administrators to identify ways to increase summer lunch outlets in Sonoma County from 4 to what turned out to be an amazing 17 sites. The Food Bank functioned as matchmaker and facilitator, using its bully-pulpit as visible anti-hunger advocates to bring together education leaders and potential community sites. The meetings matched interested potential sites with the local school district. When the original plan for Santa Rosa City Schools to sponsor 17 sites fell through at the final hour, the Sonoma Butte County Office of Migrant Education heroically agreed to sponsor the sites. Close partnership with The Santa Rosa Press-Democrat also assisted with publicity and increasing visibility. The Food Bank will energetically support the sites, providing marketing throughout the community as well as providing required monitoring of site operations.

Fresno Of the seventy-four summer lunch sites open to children across Fresno County this coming summer, an unprecedented forty will be sponsored by the Fresno County Economic Opportunities Commission. Fresno County EOC increased sites after a waiver submitted to USDA by NSD on EOC's behalf lifted the site cap for nonprofit sponsors. EOC's commitment to operating sites at community centers, apartment complexes and churches brings summer nutrition to where it is most needed: where the kids are. Fresno Metro Ministries helped out by mapping very high-need, underserved areas and recruiting local partners to participate, while EOC will sponsor the whole operation, from scratch cooking to posting flyers. It should come as no surprise that Fresno County EOC received the 2004 California Hunger Action Coalition's Hunger Fighter Award for its dramatic site expansion and commitment to identifying and removing program barriers.

San Francisco Traditionally the Mayor's Office has sponsored SFSP at community sites citywide, but starting in January 2004, the San Francisco Food Bank convened bi-monthly meetings to expand summer nutrition across the city. By working closely with a school board member and the district's nutrition services branch, all 39 summer school sites and 10 CBO programs will begin

offering summer meals to children participating in on-site programs, as well as to kids from the local neighborhoods. USDA and CDE staff provided the support needed to ensure a full launch of the seamless waiver. Policy staff from the Mayor's Office provided critical program support, assisting with the increase to 85 sites sponsored by the Department of Children, Youth and Families. These efforts to open almost 50 new sites, combined with carefully coordinated outreach efforts, such as a toll-free hotline number, will likely serve 9000 San Francisco children daily this summer, a 50% increase in reaching eligible children!

Taken together, these three communities demonstrate that committed advocates can close persistent summer food gaps and bring nutrition closest to where children live, learn and play during summer months. With determination and broad partnerships between all the key stakeholders, many of the most stubborn administrative challenges can be conquered, greatly improving access to adequate nutrition when school's out.

RECOMMENDATIONS

In order to increase access to summer nutrition, there are a number of **action steps** for policymakers and local leaders to take. These recommendations are ranked in priority order.

Federal

The US Department of Agriculture can increase utilization of SFSP by:

- ✍ Quickly and fully implementing reauthorization provisions.
- ✍ Supporting low-cost waivers to further streamline program operations.
- ✍ Using the “federal” voice to assist local collaborations in the most underserved communities.

State

The California Department of Education’s Nutrition Services Division can improve SFSP administration by:

- ✍ Fully implementing and supporting recent policy clarifications.
- ✍ Providing strong mentoring and technical assistance to sponsors.
- ✍ Encouraging all eligible schools to “seamlessly” feed community children alongside summer school students. Work with schools and other partners to identify model approaches to resolving safety concerns.
- ✍ Purchasing banners with State Administrative Expense funds to “loan” banners and promotional materials to sponsors operating open sites.
- ✍ Building on current policy, continuing to approve waiver requests only in the most dire circumstances from summer schools that seek to opt out of their nutrition responsibilities
- ✍ Increasing promotion of start-up and expansion grants for schools. Ensure schools recognize 100% of outreach activities are fundable, since unfortunately only a small percentage of equipment purchases are reimbursable through these grants.
- ✍ Distributing information, applications and claims electronically.
- ✍ Posting local site contact information, along with days and hours of operation, on the NSD website.

Since summer nutrition occurs almost entirely at schools, California Department of Education should:

- ✍ Support full-funding for summer school programs in the state budget.
- ✍ Require schools to stay open long enough to provide lunches.

Local

Local anti-hunger partners should, in chronological order:

- ✍ Use technology to identify underserved communities.
- ✍ Convene planning conversations early in the fall and winter to establish partnerships between communities and schools.
- ✍ Inform EVERY family receiving food assistance and other social services about nearby summer sites.
- ✍ Seek funds to support these efforts. (Share Our Strength's Great American Bake Sale and the SBC Foundation are among those supporting SFSP outreach in California.)

Local schools should:

- ✍ Operate summer school.
- ✍ Use the seamless program to offer nutrition at all possible sites at schools and at locations throughout the community.
- ✍ Operate sites for the entire summer, from when school ends to when school begins again.
- ✍ Use recent policy clarifications to improve site procedures and parent involvement.
- ✍ Work with local cities and neighboring school districts to provide affordable, vended meals and offer technical advice on starting, financing, and staffing the summer food program.
- ✍ Market summer lunches to children and their parents, using school marquees, mailings, school assemblies and other innovative means.
- ✍ Remove unhealthy snacks and food items (such as sodas, chips and candy) from schools and other sites where their summer programs are operating and encourage reliance upon exclusively healthy foods.
- ✍ Assume responsibility throughout the community to be the food provider of last resort, either providing healthy food year-round to all the children (on-track and off-track), and, when they cannot do it themselves, making sure that some other agency takes over the responsibility.

Local cities, counties and nonprofits should:

- ✍ Provide nutrition through SFSP at all summer recreation and enrichment programs, parks and community centers.
- ✍ Offer healthy afternoon snacks or breakfast in addition to lunch.
- ✍ Use recent policy clarifications to improve site procedures and parent involvement.
- ✍ Offer nutritious snacks and meals year-round, using the California pilot.

MARKETING AND OUTREACH GUIDE

In order to **reach more children** where sites are open and accessible, the following promotional menu can provide marketing ideas:

School Districts

- ✍ Operate truly open sites, with unlocked gates and sufficient signage to welcome neighborhood children onto school campuses for lunch.
- ✍ Reach all children with SFSP site information including school sites and community sites, through mailings and outreach. One way to do this is by providing summer food site information for all programs in the area, including times when the programs will be operating, directly to eligible families, through school lunch menus or principals' mailings to parents.
- ✍ Urge parents, grandparents, local religious groups, and other community groups to provide volunteers on a regular basis at summer food sites, thus easing the burden of school food service providers.
- ✍ Ask a local summer food sponsor to speak to students, prior to summer vacation, about the summer food program and about any recreational or academic programs that will be available in their communities.

Counties, Cities and Nonprofits

- ✍ Promote sites to families through other services families receive, such as MediCal, Food Stamps, CalWORKs and WIC. Post site lists in public offices for families.
- ✍ Promote SFSP to partners, such as grant and funding recipients, community organizations and child care centers by providing basic program information through mailers and at meetings.
- ✍ Meet with the director and staff at local social service offices to discuss SFSP and the need to promote it. Encourage them to train eligibility/intake workers on referring clients to local sites.
- ✍ Have speakers and materials describing summer food at community events such as special library programs, health fairs, and police and fire community relations meetings.
- ✍ Display summer food posters in apartment buildings, laundry mats and markets.

More promotional ideas are available at: <http://www.cfpa.net>

APPENDIX A: COUNTY BY COUNTY TABLE

(Due to conflicting estimates of county-level participation, for 2002 and 2003, those annual tables will be published as soon as the local numbers are verified)

APPENDIX B: 2004 POLICY CLARIFICATIONS

United States
Department of
Agriculture



Food and
Nutrition
Service

Western Region

100 Kearny St.
Room 400
San Francisco, CA
415-756-1088

SA 9-3-1 CA

Ms. Phyllis Bramson-Paul
Director, Nutrition Services Division
California Department of Education
1430 N Street, Suite 1500
Sacramento, CA 95814

Re: Summer Meal Service Program Clarifications and Changes

Dear Ms. Bramson-Paul:

USDA is pleased to share five policy clarifications to the current Summer Food Service Program (SFSP) regulations designed to assist sponsors to serve more children responsibly while streamlining and simplifying program administration. These clarifications are the product of discussions among SFSP/Seamless site operators, sponsors, advocates, NSD and USDA staff. As these policies are currently in place in other states, where they are working effectively, their implementation in California is strongly encouraged. With careful implementation, these changes should contribute to higher participation, lowered operating costs, and more effective operations. All the clarifications and changes made apply both to the SFSP and Seamless waiver sponsors operating summer meal sites under the National School Lunch Program (NSLP).

Parents In Summer Meal Eating/Serving Area

Problem: To maintain control many sponsors believe parents are prohibited inside the eating area. Sponsors frequently rope off “child-only” feeding areas and prevent parents from sitting with their children. Some sponsors mistakenly believe parents are prohibited from the meal service area and from helping young children carry lunch trays and open food packages. This practice can discourage parents from bringing young children to participate in the SFSP and can burden site staff with additional work assisting small children.

Update: U.S. Department of Agriculture Food Nutrition Service and California Department of Education’s Nutrition Services Division do not encourage this practice, nor require sponsors to restrict eating areas to just children. The SFSP is for all children

under 19 years old. NSD encourages sponsors to allow parents into the meal service area, especially to assist young children with their meals. Separating parents from their children is not encouraged and should only be instituted when adults eating meals is a chronic problem which cannot be corrected any other way.

Action Steps: Encourage site staff to develop and post local procedures for allowing adults in the eating area. Also, encourage the parents to bring a snack or meal to enjoy lunch with their children. Local food banks may assist with offering snacks to adults. Post information in English and Spanish specifying that while parents are allowed in the eating area, SFSP meals are for only for children.

At sites with a problem of parents eating from their children's plates we encourage, sites to work with parents to understand that SFSP meals are for persons under 19 years old. Furthermore, sponsors should inform parents if persistent violations of the regulations continue, it may result in disallowed meals and/or loss of the program for the community.

Designated Eating Area

Problem: Sites operating in small areas, such as the courtyard of an apartment complex or a room in a recreation center may not be able to seat all children waiting for lunch at the beginning of the designated lunch time.

Update: USDA and NSD encourage site flexibility with designated eating areas to accommodate children, site staff and facility constraints. For example, children may take meals outside of the immediate serving area – outside to the park, courtyard, or recreation center as long as site staff supervises the activities during the entire meal service. Site staff is still responsible for ensuring a child does not leave the site with an entire meal (see clarification below). Staff remains responsible for preventing parents from eating any parts of the child's meal.

Action Steps: Encourage sponsors to establish sites as needed and to broaden designated eating areas, if necessary, to accommodate children and facility limitations. Local site staff maintains all site responsibilities for ensuring on-site meal consumption and proper garbage disposal, etc.

Traveling Apple

Problem: Children often do not finish all their meal components during the short mealtime. Many sites use a "goodie box" to collect unopened items and redistribute them to children as second servings. But, too often half-eaten food items are thrown in the garbage, particularly if a child begins lunch near the end of the designated feeding time.

Update: USDA and NSD encourage sponsors to allow children who do not finish their entire meal to take food items such as fruit and vegetable components or other nonperishable food items away from the SFSP site. However, entrees, milk, and any food item that will quickly spoil must never be taken from the site.

Action Steps: Encourage sponsors to train staff and parents to allow certain types of foods to leave the sites. Sponsors should determine which food items from the menu can be consumed off-site. Sponsors should implement this option where sufficient staff can train parents and ensure this practice is properly managed.

Obtaining Area Eligibility

Problem: Confusion exists about what sources of information may be used to qualify SFSP sites.

Update: USDA and NSD encourage sponsors to obtain school free and reduced-price meal percentages to qualify potential SFSP open or closed enrolled sites from <http://www.cde.ca.gov/ds/sh/sn/>

Action Steps: Sponsors should use the web to update site qualifications annually. Sponsors are to list the school district and school that meets the SFSP eligibility criteria on the Site Information Sheet (50%+ of children attending the local school qualify for Free or Reduced Price school meals). Additionally, U.S. Census Bureau, Migrant, Tribal, or Housing Authority data may also be used to qualify sites.

Open Sites In Close Proximity

Problem: Confusion over determining site overlap is an ongoing concern. Traditionally, sites have not been allowed to operate nearby one another, with regulations giving schools priority. In some areas, this has limited new site growth, restricting program access in high-need neighborhoods.

Update: USDA and NSD now allow multiple, open sites to operate in the same community if the sites meet the following conditions: 1) each site serves its own audience, 2) meal service is offered at the same/similar time and for a similar length of time (to prevent children from going to more than one site for the same meal).

Action Steps: Encourage sponsors and reviewers to work with other sponsors and sites to ensure the sites serve separate audiences at similar times.

Please distribute the enclosed clarifications and changes to your SFSP and Seamless waiver sponsors within 30 days.

Sincerely,

JANET ALLEN, Director
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APPENDIX C: CONTACT INFORMATION

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APPENDIX D: SUMMER NUTRITION HISTORY

In 1968, Congress created the Special Food Service Program for Children, providing 99,000 children across the country a summertime meal when school doors closed. By July 2003, the program had long since changed its name to Summer Food Service Program and was serving over 2 million children daily nationwide, with several million more receiving meals, under NSLP or other federal food programs, as part of summer school, year-round classes.

SFSP is administered nationally by the United States Department of Agriculture (USDA) and, in California, by the California Department of Education, Nutrition Services Division. Summer Food Service Programs run by community-based organizations are generally connected to enrichment, recreation and other programs. In fact, one of the benefits of the summer food programs is their ability to anchor and support valuable and safe activities for out-of-school children. The availability of federal funds for summer nutrition offers California an incredible resource to fight hunger and obesity year-round; yet, program gaps persist – too few sites *and* too few participants – even in the neediest communities.

APPENDIX E: CALIFORNIA YEAR-ROUND PILOT

The following language was included in the 2004 Child Nutrition Reauthorization Act.

SEC. 123. YEAR-ROUND SERVICES FOR ELIGIBLE ENTITIES.

Section 18 of the Richard B. Russell National School Lunch Act (42 U.S.C. 1769) (as amended by section 122) is amended by adding at the end the following:

`(j) YEAR-ROUND SERVICES FOR ELIGIBLE ENTITIES-

`(1) IN GENERAL- A service institution that is described in section 13(a)(6) (excluding a public school), or a private nonprofit organization described in section 13(a)(7), and that is located in the State of California may be reimbursed--

`(A) for up to 2 meals during each day of operation served--

`(i) during the months of May through September;

`(ii) in the case of a service institution that operates a food service program for children on school vacation, at anytime under a continuous school calendar; and

`(iii) in the case of a service institution that provides meal service at a nonschool site to children who are not in school for a period during the school year due to a natural disaster, building repair, court order, or similar case, at anytime during such a period; and

`(B) for a snack served during each day of operation after school hours, weekends, and school holidays during the regular school calendar.

`(2) PAYMENTS- The service institution shall be reimbursed consistent with section 13(b)(1).

`(3) ADMINISTRATION- To receive reimbursement under this subsection, a service institution shall comply with section 13, other than subsections (b)(2) and (c)(1) of that section.

`(4) EVALUATION- Not later than September 30, 2007, the State agency shall submit to the Secretary a report on the effect of this subsection on participation in the summer food service program for children established under section 13.

`(5) FUNDING- The Secretary shall provide to the State of California such sums as are necessary to carry out this subsection for each of fiscal years 2005 through 2009.'.

What does this mean for California?

- ✍ All California community organizations, such as Boys and Girls Clubs, park and recreation departments and cities who run the Summer Food Service Program [SFSP], will be eligible to receive reimbursements of \$.6125 per day all year, under one federal food program - SFSP - for snacks served in the afterschool setting. (Current law has required these agencies to apply through a separate, cumbersome process, Child and Adult Care Food Program, to receive snack reimbursements during the school year).
- ✍ This year-round snack service will operate under summer rules, enabling virtually seamless nutrition, year-round for current sponsoring agencies.
- ✍ The legislation is effective July 1, 2004, so advocates and administrators should notify all California non-school-based sponsors whose summer program ends in late August to plan for continuation of federal funding during the rest of the year, if they serve snacks.
- ✍ Significant new federal resources for communities and improved nutrition for children are now available! Most afterschool programs at community sites previously have been forced to use their own program budgets or parents' contributions to provide snacks, and few have been able to plan nutritionally sensible snacks. So, the availability of federal funding will greatly assist programs on shoestring budgets and federal nutrition guidance will lead to more balanced, healthy afternoon snacks.