



June July August



# Report to Congress: USDA's Simplified Summer Food Program 2001—2006

April 2007

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**Report to Congress:**

**USDA's Simplified Summer Food Program**

**2001 – 2006**

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# **Report to Congress: USDA's Simplified Summer Food Program 2001 – 2006**

## **Executive Summary**

The Simplified Summer Food Program (“Simplified Summer”) is a modified version of the Summer Food Service Program (SFSP). The modifications allow reimbursements at a fixed rate rather than limiting reimbursement to administrative and operating costs documented by the individual provider.

Simplified Summer was based on the Lugar Pilot Project (“Pilot”) which was in place from FY 2001 to FY 2004. Simplified Summer began operating in FY 2005 and extends the summer food program benefits, first established in the Pilot, to additional States. States with lower-than-average participation in SFSP were eligible for the Pilot and, now, for Simplified Summer. Meals served are reimbursed at the allowable rates under SFSP without regard to actual or budgeted costs. Sponsoring organizations in Simplified Summer do not have to report costs in order to receive reimbursement, nor are they limited to using administrative funds strictly for administration.

The Child Nutrition and WIC Reauthorization Act of 2004 required that the Food and Nutrition Service (FNS) evaluate the impact of Simplified Summer which now operates in twenty-six States and the Commonwealth of Puerto Rico. The evaluation is based on both discussion interviews with sixteen States participating in the program and quantitative analyses of program outcome measures.

In discussion interviews, States range from enthusiastic for the program's potential to assist in recruiting and retaining sponsors to the perception that it is a bookkeeping change with minimal program impact.

The quantitative analyses in this report show that many positive changes in key outcome measures of summer food programs have been taking place in the States that have participated in Simplified Summer:

- The States that have been operating under Simplified Summer procedures since 2001 have maintained about a 30 percent increase in sponsors while States that have never been eligible to operate under Simplified Summer rules (“Traditional SFSP”) show a small decline.
- Among the States that entered the program in 2005 (“2005 Cohort”), the number of sponsors also increased by over 27 percent, compared to a slight decline in the number of sponsors in the Traditional SFSP States.

Aspects of the program that are perceived as strong points that aid States in maintaining and growing their summer food programs for children include: reduced paperwork in requesting

reimbursements, simplified rules in not having to report on administrative and operational costs, higher reimbursement levels, and more predictability and ease in calculating the expected level of reimbursement.

In the Pilot States, the number of food service sites per sponsor rose from about 5 in 2000 to almost 7 in 2006, narrowing the gap with the Traditional SFSP States which average around 10.

The Pilot States in Simplified Summer have seen small increases in summer lunches (SFSP plus National School Lunch Program – NSLP) as a percent of school-year NSLP lunches; the 2005 Cohort States have not. The impact of Simplified Summer on meal counts cannot be disaggregated in the current evaluation from other impacting factors identified by the States. Changes in meal counts are attributable by some States to population shifts of households due to economic relocation. Meal counts may not always rise in response to Simplified Summer as some States try to encourage sponsors to provide “one good meal” per day, rather than just increasing the number of meals offered.

An examination of change in the quantity of total SFSP-only meals served shows that:

- The Pilot States experienced over a 40 percent *increase* in total SFSP meals served from 2000 to 2006.
- The total summer meals served in the States that became eligible for Simplified Summer in 2005 and 2006 were declining until the year they began operating under Simplified Summer procedures.
- States operating under traditional SFSP rules experienced a 24 percent decline in total SFSP meals served from 2000 to 2006.

The States interviewed did not perceive private nonprofit sponsors to be of any greater source of concern than other sponsors when monitoring expenditures and reimbursements.

With only a few exceptions, States in the telephone discussions perceive that the quality of sponsors' meals is being maintained. Only one State out of sixteen believes that Simplified Summer's reimbursement of meals at a fixed rate will enable sponsors to improve the quality of their meals. Other States note that rising costs of food, labor, transportation, gasoline and declining levels of volunteer support offset some or all of the economic benefits provided by the meal reimbursement amounts of Simplified Summer.

Almost all of the States (15 out of 16) reported in the telephone discussions that sponsors find the claims process easier and simpler under Simplified Summer because it does not require the submission of cost data when seeking reimbursement. The reduction in paperwork is also seen by the States as a strong selling point of Simplified Summer. This has also simplified the States' job of training sponsors, freeing up time for marketing the program and performing other tasks in running the program.

Changes in the number of sponsors and other outcome measures cannot be attributed with certainty to the impact of the Simplified Summer Food Program based on the available data. However, States participating in the Simplified Summer Food Program have shown positive changes in key outcome measures of summer food programs, such as number of sponsors, number of food service sites per sponsor, total SFSP meals served, and average daily attendance.



## Report to Congress:

# USDA's Simplified Summer Food Program 2001 – 2006

## Chapter 1 – Purpose and Methodology

The Simplified Summer Food Program is a modified version of the Summer Food Service Program. The modifications allow reimbursements at a fixed rate rather than limiting reimbursement to administrative and operating costs documented by the individual provider.

To understand USDA's summer feeding programs for children, they should be seen in the context of the National School Lunch Program (NSLP). On an average school day during the school year, the NSLP provides subsidized meals to approximately 30 million school children, including 18 million low-income children. The Summer Food Service Program (SFSP) was authorized in 1968<sup>1</sup> to provide financial incentives for the provision of nutritious meals to low-income school-age children when school is not in session.

In the past, participation in the SFSP was only about one-third of the participation in the NSLP. This disparity is the source of substantial concern that many food insecure children may not have access to adequate nutritious meals during the summer months.<sup>2</sup>

In December 2000, Public Law 106-554 authorized a pilot modification to the SFSP in 13 states and Puerto Rico to promote improved access to summer meals. States were eligible to participate in the Pilot if the proportion of low-income children they served in July 1999 through SFSP and NSLP relative to March 1999 NSLP participation was below 50 percent of the national average. The findings from this pilot were the subject of a USDA report to Congress in April 2004.<sup>3</sup>

To further promote the goal of making healthful meals available to children in need during the summer, Public Law 108-265, the Child Nutrition and WIC Reauthorization Act of 2004, established:

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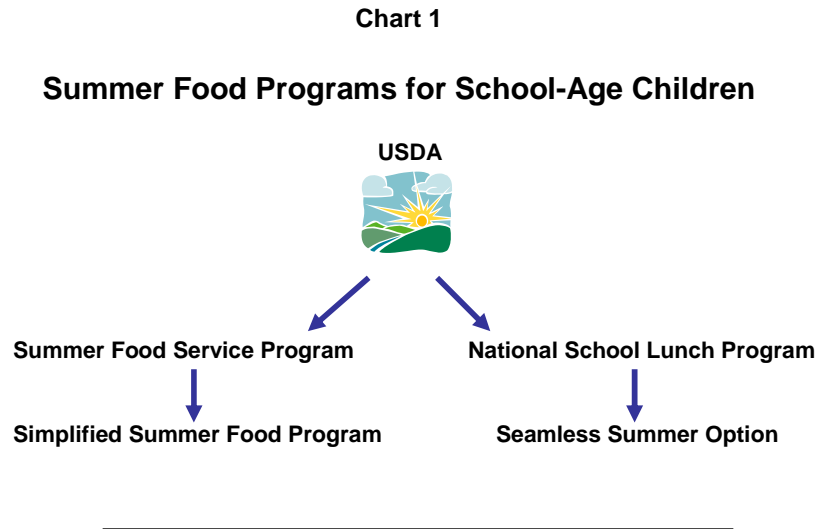
<sup>1</sup> In 1968, Public Law 90-302 authorized the "Special Food Service Program for Children," the predecessor of the SFSP. In 1975, Public Law 94-105 replaced this with the Summer Food Service Program.

<sup>2</sup> Mark Nord and Kathleen Romig, "Hunger in the Summer: Seasonal Food Insecurity and the National School Lunch and Summer Food Service Programs," *Journal of Children & Poverty*, Vol. 12, No 2, 2006; Food Research and Action Center (FRAC), "Hunger Doesn't Take a Vacation: Summer Nutrition Status Report," July 2006.

<sup>3</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Analysis, Nutrition, and Evaluation, "Evaluation of The 14 State Summer Food Service Program Pilot Project," Nutrition Assistance Program Report Series, No. CN-04-SFSP14. By Anita Singh, Ph.D. and John Endahl Ph.D. Alexandria, VA: 2004.

- The Simplified Summer Food Program under the SFSP, essentially an expansion of the Pilot, to encourage SFSP sponsoring organizations to provide meals and/or serve more meals during the summer, and
- The Seamless Summer Option, an extension of NSLP/SBP, which allows schools to provide summer meals under the NSLP.

The relationship among these programs and options is displayed in Chart 1.



The Child Nutrition and WIC Reauthorization Act also required that the Food and Nutrition Service (FNS) evaluate the impact of the Simplified Summer Food Program which now operates in twenty-six States and the Commonwealth of Puerto Rico. This report addresses the impact on:

- Participation by children and service institutions (sponsors) in the summer food service in the eligible State in which the program is carried out;
- The quality of the meals and supplements served in the eligible State in which the program is carried out; and
- Program integrity.

## Background

The Simplified Summer Food Program (“Simplified Summer”) was based on the Lugar Pilot Project (“Pilot”) which was in place from FY 2001 to FY 2004.<sup>4</sup> Simplified Summer began

<sup>4</sup> Results from the first few years of the Pilot have been previously evaluated through a mail back survey in 2004 (*Evaluation of the 14 State SFSP Pilot Project - April 2004* at <http://fns.usda.gov/oane/>).

operating in FY 2005 and extends the summer food program benefits, first established in the Pilot, to additional States.

Under simplified procedures, SFSP sponsoring organizations<sup>5</sup> in the eligible States receive the maximum amount of operating and administrative reimbursements (meals times rates) without regard to their actual or budgeted costs. This makes them exempt from the cost comparison requirements in the SFSP regulations at 7 CFR 225.9(d)(7) and (d)(8). In addition, sponsors operating under simplified procedures may combine their operating and administrative reimbursements to pay for any allowable program cost.

Sponsoring organizations in Simplified Summer do not have to report costs in order to receive reimbursement (they must continue to maintain records of their costs and make them available for review or audit). In contrast, sponsors operating under regular SFSP procedures have separate rates for food and administration and must document and report costs. Sponsors in eligible States must apply each year to participate and submit budgets as they would under the regular SFSP.

States are eligible to participate in Simplified Summer based on a formula that selects those with the lowest ratios of July Average Daily Attendance to March NSLP free and reduced price meals (defined in section 116(f)(5)(A) of P.L. 108-265). Table 1 shows that Simplified Summer operates in the thirteen States and the Commonwealth of Puerto Rico of the Pilot and in States that became eligible to participate in 2005 (“2005 Cohort”). An additional 7 States were included under P.L. 109-97, section 777(a)(2) (“2006 Cohort”). (Note: the terms “Pilot,” “2005 Cohort,” and “2006 Cohort” are used throughout this report to refer to the States in these three groups – see the Glossary of Acronyms.)

Based on historical growth prior to participation in Simplified Summer, the estimated increase in 2005 Pilot state meals is approximately 5 percent, or \$3.0 million in meal costs.

**Table 1**  
**States Eligible for the Simplified Summer Food Program**

<b>Pilot</b>		<b>2005 Cohort</b>	<b>2006 Cohort</b>
Alaska	Nebraska	Colorado	Arizona
Arkansas	New Hampshire	Louisiana	Maine
Idaho	North Dakota	Michigan	North Carolina
Indiana	Oklahoma	Mississippi	Tennessee
Iowa	Puerto Rico	Ohio	Washington
Kansas	Texas	Oregon	West Virginia
Kentucky	Wyoming		Wisconsin

<sup>5</sup> A sponsoring organization is a public or private nonprofit school food authority, a public or private nonprofit residential summer camp, a unit of local, municipal, county or State government, a public or private nonprofit college or university currently participating in the National Youth Sports Program, or a private nonprofit organization which develops a special summer or other school vacation program providing food service similar to that made available to children during the school year under the National School Lunch and School Breakfast Programs and which is approved to participate in the Program. Sponsors are referred to in the Richard B. Russell National School Lunch Act (42 U.S.C. 1761) as “service institutions”.

## Methodology

The current evaluation of Simplified Summer is based on (i) analyses of FNS administrative data, reported by the States for SFSP and NSLP, from 2000 through 2006 and (ii) the results of telephone interviews conducted in 2005 and 2006 with sixteen States participating in the program. Due to the different times of entry into the program by States, the report presents data in four groupings:

1. *Pilot.* The most quantitative information exists for these thirteen States and the Territory of Puerto Rico, as they operated under Simplified Summer rules from 2001 through today. Eight of these States were included in telephone interviews (Indiana, Iowa, Kansas, Kentucky, Nebraska, New Hampshire, Oklahoma, and Texas).
2. *2005 Cohort.* Only two years of quantitative data exist under Simplified Summer rules for these six States – 2005 and 2006. Four States of the 2005 Cohort were included in the telephone interviews (Colorado, Michigan, Ohio, and Oregon).
3. *2006 Cohort.* Only one year of post-implementation quantitative data exists on these seven States. Four were included in the telephone interviews (Arizona, North Carolina, West Virginia, and Wisconsin).
4. *Traditional SFSP.* These are the 24 States, the District of Columbia, and the Virgin Islands that have never operated under Simplified Summer rules. None were included in the telephone interviews.

It is important to note that Louisiana – one of the States in the 2005 Cohort – was greatly affected by Hurricanes Katrina and Rita in 2005. For example, during the summer of 2005 Louisiana had 640 food service sites, after the hurricanes this number dropped to 258 (Louisiana data is provided in Appendix D). To enable a clearer view of the impact of Simplified Summer, we do not include Louisiana in the Tables, Figures, and Charts in the report.

## Outcome Measures

Congress directed USDA to evaluate the impact of Simplified Summer on participation of children and sponsors, meal quality, and program integrity. In addition, the changes made by Simplified Summer are part of a fundamental policy concern of USDA – to reduce the disparity in participation between summer and school-year feeding programs. Therefore the evaluation also addresses the impact on the disparity between summer and school-year participation.

Three objective indicators of these impacts are found in Program Assessment and Rating Tool (PART) reviews of the SFSP. FNS and the Office of Management and Budget have agreed that these are appropriate measures to assess the impact and performance of the SFSP, and so we use them here.<sup>6</sup> These are:

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<sup>6</sup> Office of Management and Budget, 2006: “Detailed Information on the Summer Food Service Program Assessment” <http://www.whitehouse.gov/omb/expectmore/detail/10003026.2006.html>; accessed on March 20, 2007.

- **Number of SFSP sponsors.** This measure is directly relevant to the legislative direction given FNS. It is important because the number of sponsors affects the amount of access low-income children have to the program. In 2004 there were 3,685 sponsors in the SFSP. FNS has targeted increasing the number of sponsors to expand access to the program for low-income children. The 2008 target is 3,831. The first outcome measure to assess Simplified Summer is change in the number of sponsors.
- **Number of SFSP sites per sponsor.** Increases in the number of food service sites per sponsor may reduce management costs per site and improves the efficiency of USDA and State agency oversight efforts. In 2004 there were 8.33 sites per sponsor in the SFSP; the 2008 target is 8.50. The second outcome measure is change in the number of SFSP food service sites per sponsor.
- **Summer lunches as a percent of school-year lunches.** For the third outcome measure we calculate the percentage of low-income children receiving SFSP and NSLP lunches in the summer as a proportion of children receiving free and reduced price NSLP lunches during the school year. This figure reflects the relative coverage of meal service for low-income children during the summer vs. the school year. In 2004 the national ratio was 31.8 percent; the 2008 national target is 38 percent.

In addition to these three PART-related measures, this report includes several additional outcome measures that bear on the Congressional interest in Simplified Summer:

- **Total meals served.** The relative coverage of lunch service during the summer vs. the school year does not, by itself, indicate whether total SFSP meals (breakfast + lunch + snacks + supper) are increasing or decreasing in the Simplified Summer States. This outcome measure addresses this issue.
- **Change in the number of children served.** This measure is directly related to the legislative direction given FNS. FNS measures this by SFSP Average Daily Attendance, an approximate measure of participation in the program that is reported by States to FNS for the month of July each year.
- **Meal quality.** This topic was included in the telephone discussions with States. FNS measures quality through the perceptions of these State officials.
- **Program integrity.** Aspects of program integrity were included in the telephone discussions with States. FNS examines the claims process, the pattern of operating and administrative costs and the incidence of non-allowable costs. The need to restore funds back into the nonprofit food service accounts is also addressed.

The results of the analysis of these and other ancillary measures are provided in Chapters 2 and 3.

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## **Chapter 2 – Impact by Program Outcome Measures**

This chapter first provides information from the sixteen State interviews that were conducted in 2005 and 2006. It then presents quantitative information on the number of sponsors, the number of food service sites per sponsor, summer lunches as a percent of school year lunches, total number of meals, and number of children served (average daily attendance). Information from the State interviews is incorporated in the text to provide insight into the quantitative data.

The quantitative measures are displayed to show change over time, typically for the period beginning in 2000, the year just before the Pilot, to 2006. Where applicable, the figures and charts compare the Pilot, 2005 Cohort, 2006 Cohort and Traditional SFSP States.

### **State Perceptions of Impact**

Among the sixteen Simplified Summer States that participated in the telephone discussions:

- Reaction to the program ranged from enthusiastic for the program's potential to assist in recruiting and retaining sponsors to the perception that it is a bookkeeping change with minimal program impact.
- Many State staff participating in the telephone discussions expressed difficulty in disaggregating the effects of Simplified Summer from competing factors which impact local demand for the SFSP, such as strong outreach efforts on the part of the States, State-implemented operating system changes, financial constraints on the sponsors, local communities' initiatives, local economic factors, and population levels and shifts.
- Some States believe that Simplified Summer has a positive impact and benefit on the availability of food for children during the summer, but they can't verify or quantify its impact.

### **Change in Number of SFSP Sponsors**

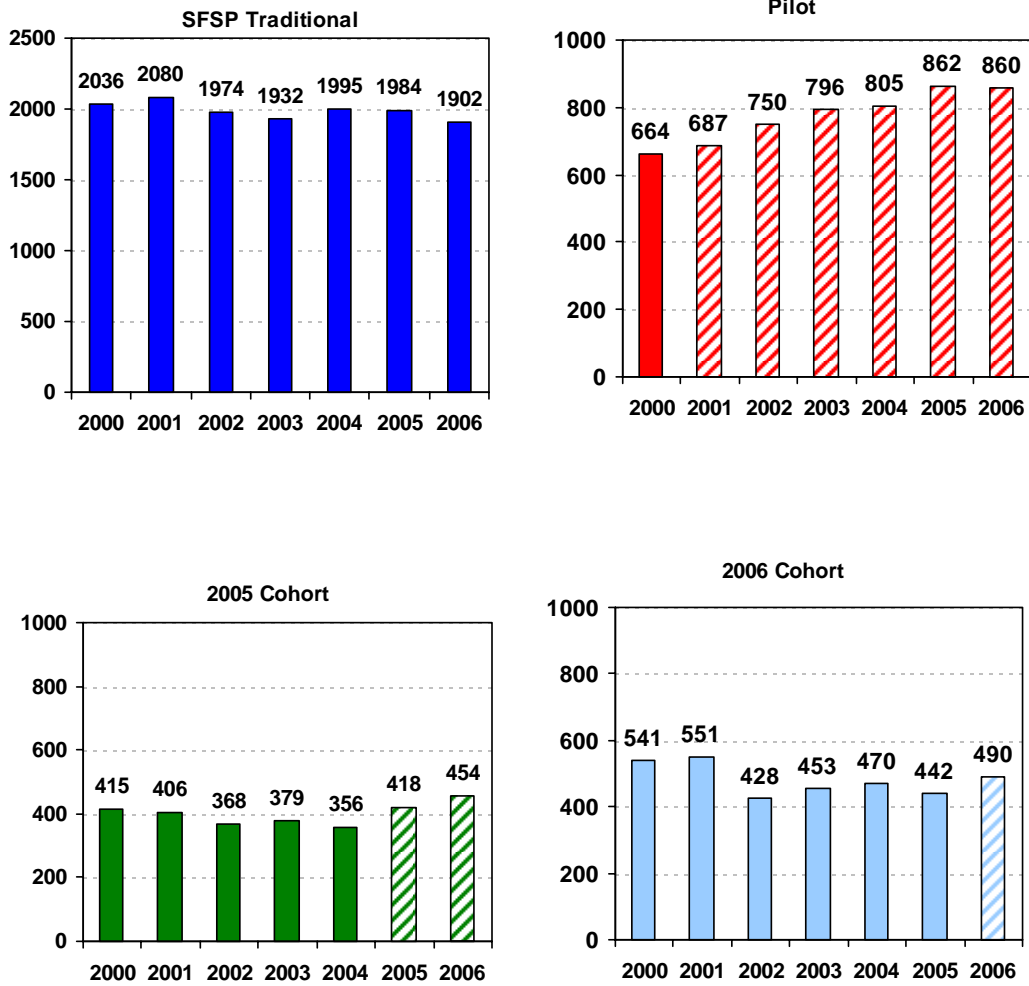
A sponsor is a local organization that arranges for meals to be served at one or more sites, prepares and submits to the State claims for meal reimbursements and monitors local sites for compliance with program rules. The sponsor signs an agreement with the administering State agency and assumes final administrative and financial responsibility for the program.<sup>7</sup>

The Simplified Summer legislation had the potential to make it more attractive for organizations to participate in the Summer Food Service Program as sponsors. As shown in Figure 1 and Table 2, the number of sponsors in the Pilot States grew much faster than in the Traditional SFSP States (which had a slight decline). The 2005 Cohort and the 2006 Cohort States reversed prior declines in their number of sponsors during their first years of eligibility.

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<sup>7</sup> See footnote 6 for the full regulatory definition.

**Figure 1**  
 Summer Food Service Program  
 Traditional SFSP, Pilot, 2005 Cohort and 2006 Cohort States  
*Number of Sponsors in July*  
 2000-2006



Note: Hatched bars represent years in Simplified Summer Food Program.

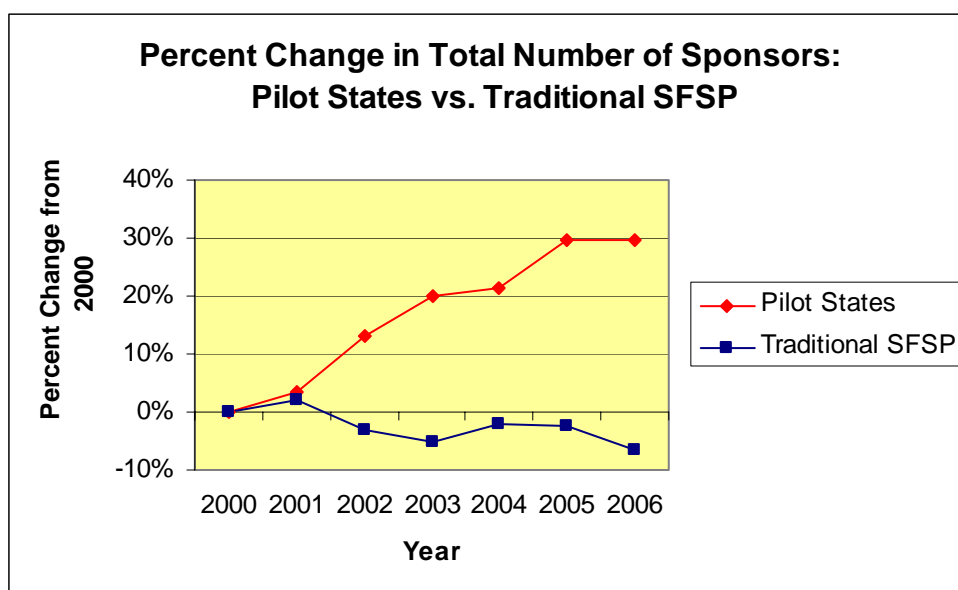
Source: USDA's Simplified Summer Food Program 2001-2006. USDA/FNS 2007



Table 2

SFSP Sponsors in July							
	2000	2001	2002	2003	2004	2005	2006
Traditional SFSP	2,036	2,080	1,974	1,932	1,995	1,984	1,902
Pilot	664	687	750	796	805	862	860
2005 Cohort	415	406	368	379	356	418	454
2006 Cohort	541	551	428	453	470	442	490
<b>Total</b>	<b>3,656</b>	<b>3,724</b>	<b>3,520</b>	<b>3,560</b>	<b>3,626</b>	<b>3,706</b>	<b>3,706</b>

Chart 2



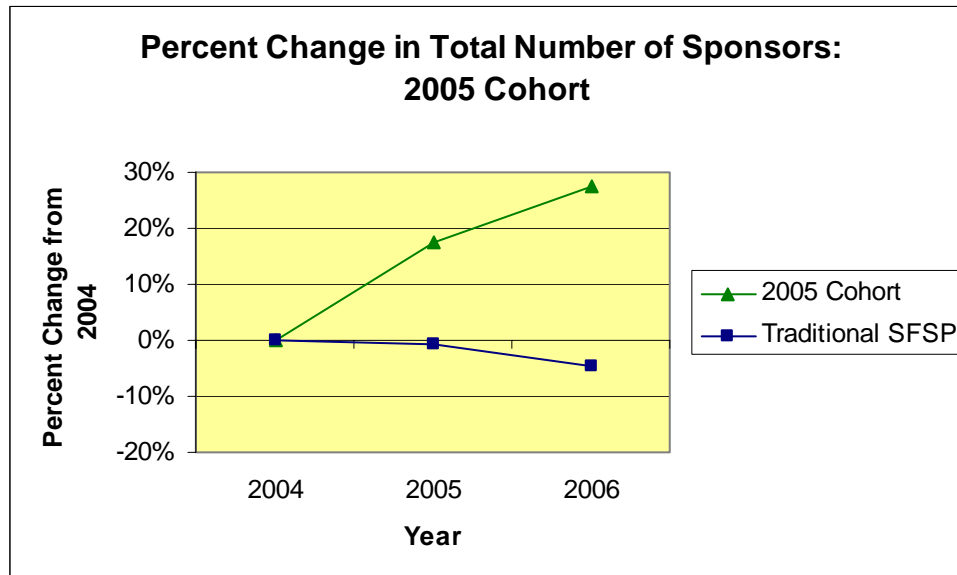
Note: Louisiana is not part of either group.

The effect of the legislative change is most evident in the States of the Pilot which have been operating under the Simplified procedures for six summers. Chart 2 shows the percent change (from 2000) in the number of sponsors in the Pilot and Traditional SFSP States.

- The Pilot States have maintained almost a 30 percent increase in sponsors while States that operate under the traditional SFSP rules show a small decline.

There also appears to have been an increase in the number of sponsors in the 2005 Cohort (Chart 3).

Chart 3



Note: Louisiana not included due to Hurricanes Katrina and Rita

- Excluding Louisiana, the number of sponsors in the States of the 2005 Cohort increased by over 27 percent in two years, compared to a slight decline in the number of sponsors in the Traditional SFSP States.<sup>8</sup>

While these data cannot prove that Simplified Summer was the cause of the increases, States in the interviews identified several aspects of the program as positive incentives that facilitate their efforts to recruit and retain sponsors. Perceptions of State staff include:

- Nine out of sixteen States believe that Simplified Summer is a positive factor contributing to an increase in their number of sponsors (Appendix B).
- Aspects of the program that are perceived as strong points that aid States in maintaining and growing their summer food programs for children include:
  - Reduced paperwork in requesting reimbursements,
  - Simplified rules in not having to report on administrative and operational costs,
  - Higher reimbursement levels, and
  - More predictability and ease in calculating expected level of reimbursement.
- Some States felt that additional organizations will want to join the program as sponsors in coming years as current sponsors communicate positive reinforcements about changes in reporting requirements and rates of reimbursement.

<sup>8</sup> If one includes Louisiana the 2005 Cohort increase is reduced to 21 percent. The State had a 27% drop in sponsors after Katrina.

- States believe that Simplified Summer's contribution to growth in the number of sponsors also comes from its role in reducing sponsor turnover through the benefits it offers.
- States also report that sponsors with large rural populations experience difficulty in growing their programs, even under Simplified Summer. The interviewed States report that the greater need for transportation in rural areas to get the food to the children, or the children to the food, limits sponsors' ability to reach additional children and places limits on their ability to increase the number of meals served.<sup>9</sup>
- Some States predict that growth in sponsors and food service sites will be limited, especially in rural areas, until the threshold for site eligibility is lowered. The current standard for eligibility of most food service sites is set at 50 percent eligibility for free or reduced price school meals for the area served by an open site or for the group of children attending an enrolled site. The States that say this perceive that fluctuations in the percent of students eligible to participate in Simplified Summer results in some sponsors entering the program but dropping out in subsequent summers as the percent of eligible students decline.<sup>10</sup> Fluctuations in the number of children frequenting sponsors' food care or activity programs is a key factor mentioned by States as to whether a sponsor continues to operate a summer food program for children.
- Sponsors also drop out of the program when other sources of funding are not renewed, such as the National Youth Sports Program and the Twenty-First Century Grant Program.
- Some States attribute retention of sponsors to their efforts to screen out organizations that are not likely to succeed as sponsors. Organizations with lower likelihood of success are encouraged by some States to participate in Simplified Summer as food distribution sites operating under more established sponsors. Summer school programs and communities' perceptions of need are also seen aiding retention and increasing the number of sponsors.

### **Change in Number of SFSP Food Service Sites per Sponsor**

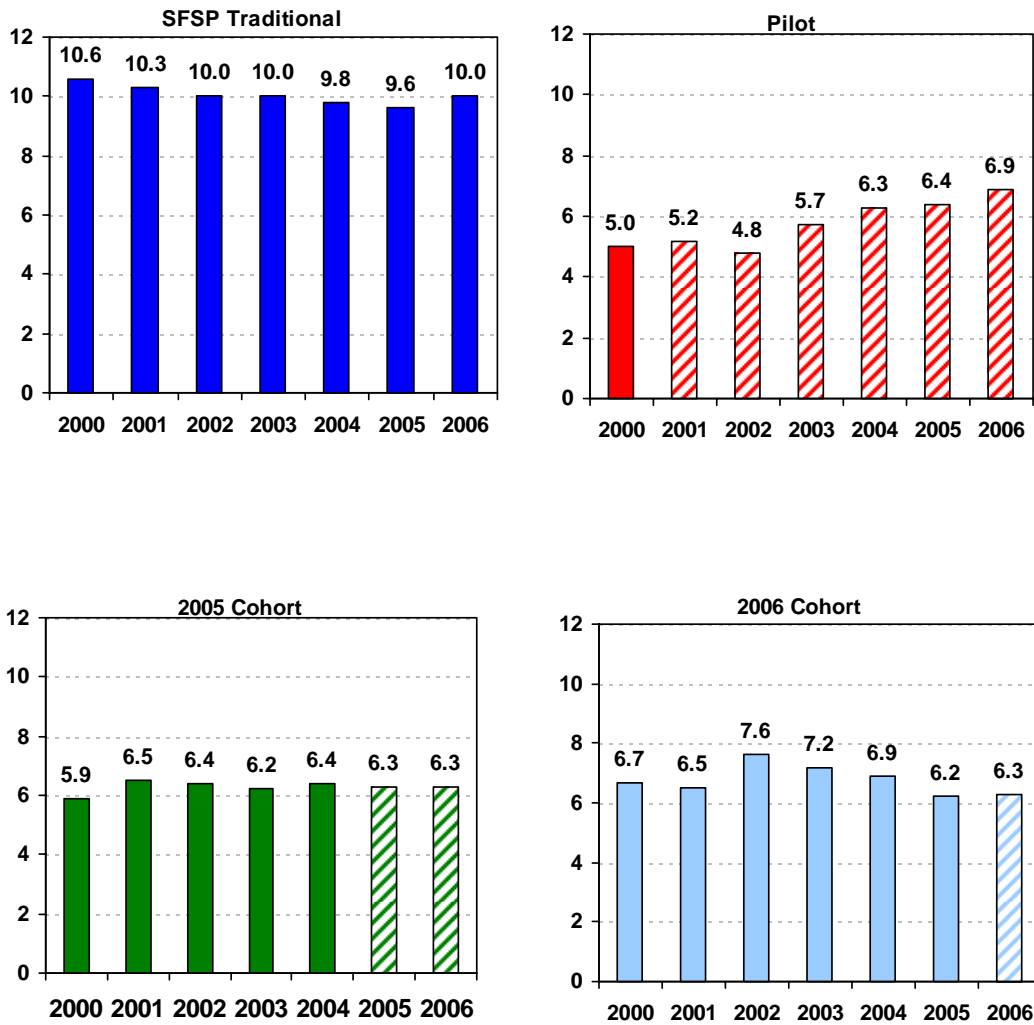
In the Pilot States, the average number of food service sites per sponsor rose from about 5 in 2000 to almost 7 in 2006, narrowing the gap with the Traditional SFSP States which average around 10 (Figure 2 and Table 3). The relationship between the number of food service sites per sponsor and increased program benefits to children is not documented. However, a higher average number of food service sites per sponsor extends sponsors' coverage and their ability to reach more children and provide more meals.

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<sup>9</sup> The Child Nutrition and WIC Reauthorization Act of 2004 authorized USDA to provide up to \$4 million in grants for innovative approaches in overcoming limited transportation resources in rural areas for the SFSP. Under this authority, in December 2005, USDA awarded multi-year grant funds to five States, including four Simplified Summer States – Mississippi, Oregon, Texas, and West Virginia.

<sup>10</sup> A special project authorized by Section 116(c) of Public Law 108-265, The Child Nutrition and WIC Reauthorization Act of 2004, is testing reduction of the SFSP eligibility limit from 50 percent or more free or reduced price to 40 percent or more in one State (Pennsylvania). A report to Congress on this project is due by January 1, 2008.

**Figure 2**  
 Summer Food Service Program  
 Traditional SFSP, Pilot, 2005 Cohort and 2006 Cohort States  
*Number of Food Service Sites per Sponsor in July*  
 2000-2006



Note: Hatched bars represent years in Simplified Summer Food Program.

Source: USDA's Simplified Summer Food Program 2001-2006. USDA/FNS 2007

Only four of the sixteen States participating in the telephone discussions identified Simplified Summer as contributing directly to growth in number of food service sites (Appendix B):

- States suggested that the growth in the number of food service sites mainly came from increases in the number of sponsors.
- Some States suggested that the increase in the number of summer food service sites is partly due to the inclusion of private, nonprofit sponsors and school district sponsors switching to Simplified Summer from the Seamless Summer Option.
- Only four of the interviewed States feel that the ease in paperwork and greater predictability in their level of reimbursement resulted in sponsors opening more food service sites. State and community outreach efforts, sustained growth over time by existing sponsors, and demand for services (in places where sponsors have the capacity to expand) are some of the other reasons suggested by the States for explaining the growth in the number of food service sites.

Table 3

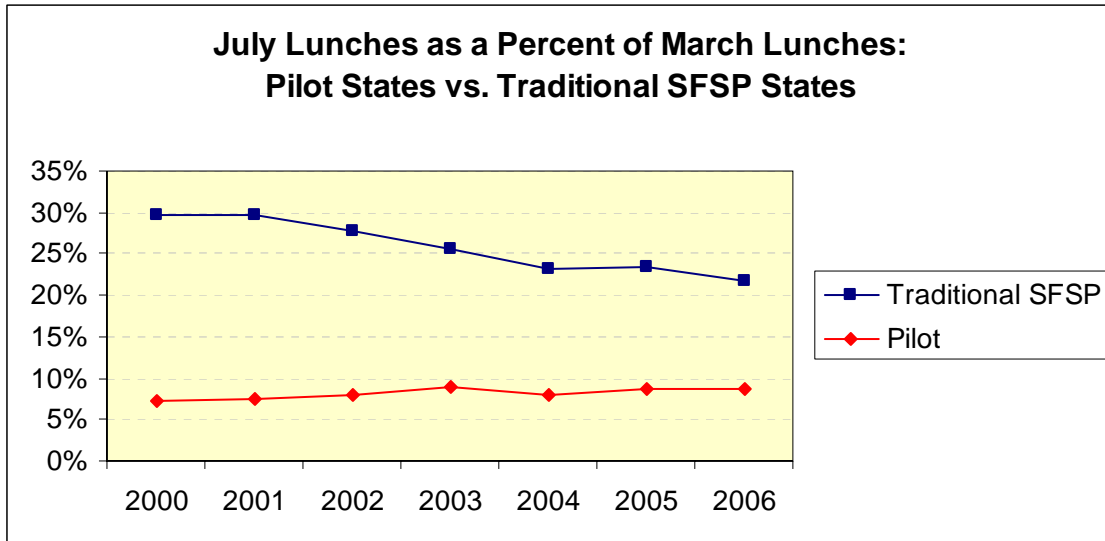
<b>Average SFSP Sites per Sponsor in July</b>							
	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
Traditional SFSP	10.6	10.3	10.0	10.0	9.8	9.6	10.0
Pilot	5.0	5.2	4.8	5.7	6.3	6.4	6.9
2005 Cohort	5.9	6.5	6.4	6.2	6.4	6.3	6.3
2006 Cohort	6.7	6.5	7.6	7.2	6.9	6.2	6.3
<b>Total</b>	<b>8.5</b>	<b>8.4</b>	<b>8.3</b>	<b>8.3</b>	<b>8.3</b>	<b>8.1</b>	<b>8.4</b>

### Change In Summer Lunches as a Percent of School-Year Lunches

Another potential impact of the Summer Food Service Program can be measured by calculating the percentage of low-income children receiving SFSP plus NSLP lunches in the summer as a proportion of children receiving free and reduced price NSLP lunches during the school year. This reflects the relative coverage of lunch service provided by USDA’s summer feeding programs for low-income children during the summer compared to the provision of lunches to low-income children during the school year through the National School Lunch Program.<sup>11</sup>

We calculate this measure in two ways: first, for the month of July only, which is parallel to the formula used to determine State eligibility for Simplified Summer;<sup>12</sup> second, as calculated for the summer (June + July + August) as is done for the program’s OMB PART reviews.<sup>13</sup>

Chart 4



Note: Louisiana is not part of either group.

<sup>11</sup> There are two reasons why the measure combines SFSP and NSLP lunches: first, NSLP summer meals are part of FNS’ support for low-income children in the summer; and second, because we want to make sure that we did not count lunches provided by school sponsors who switched from providing through NSLP to SFSP (or vice versa) as changes in summer lunch service.

<sup>12</sup> The numerator of the percentage = [the sum of free and reduced price lunches under the NSLP for July + SFSP lunches for July] divided by [the number of operating days in July]. The denominator of the percentage = [the sum of free and reduced price lunches under the NSLP for March] divided by [the number of operating days in March]. See Appendix C for more detail. As defined in section 116(f)(5)(A) of P.L. 108-265, a State’s eligibility to participate in Simplified Summer is based on the ratio of July Average Daily Attendance to March NSLP free and reduced price meals.

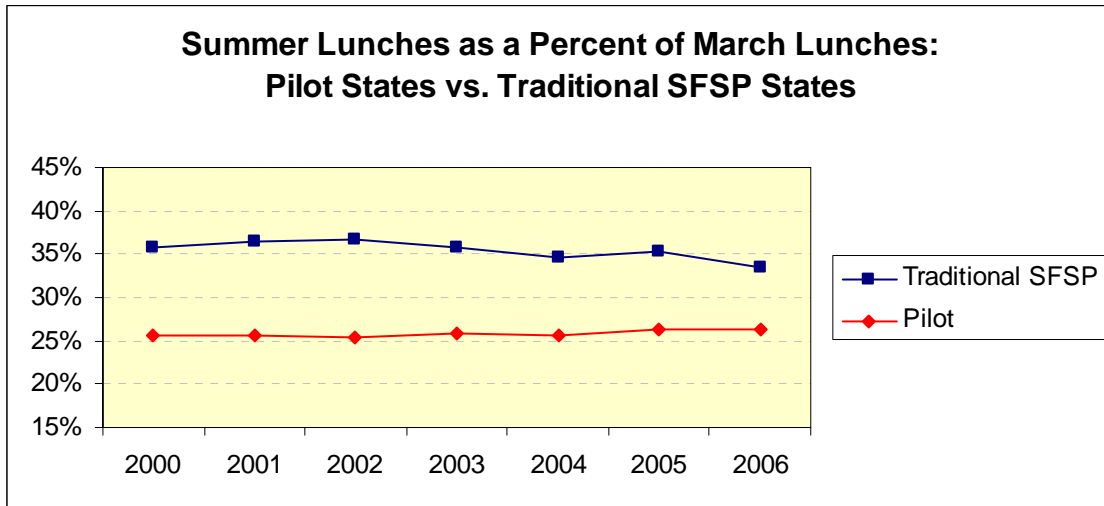
<sup>13</sup> The percentage is similar but combines June, July, and August data and adjusts for operating days in each month separately. See Appendix C for formula.

The July calculation (Chart 4) shows that the Pilot States increased from 2000 to 2003 and, since 2003, have held relatively steady, hovering around 9 percent. On the other hand, the Traditional SFSP States held steady between 2000 and 2001 but have been declining since then and in 2006 were slightly over 20 percent.

Chart 4 focuses only on July, and that does not account for all the other months in which school is not in session in many States. Chart 5 presents the same comparison but uses the OMB PART calculation, which combines all lunches served across the entire summer (June + July + August).

The PART calculation (Chart 5) indicates that the Pilot and the Traditional SFSP States have changed slowly, with the gap between the Pilot and Traditional SFSP States narrowing. In 2006 the Pilot States and Traditional SFSP States were closer than at any time in the past (at 26% and 33% respectively).

Chart 5



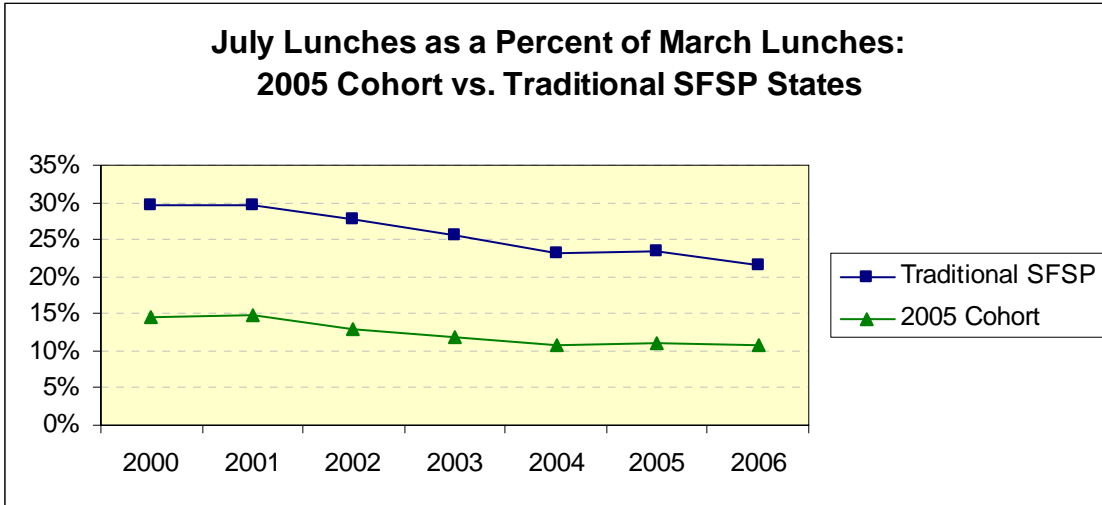
Note: Louisiana is not part of either group.

Charts 6 and 7 explore the situation in the 2005 Cohort States. The July measure (Chart 6) shows the 2005 Cohort as holding steady since 2004 while Traditional SFSP States display the same decline described in connection with Chart 4. On the summer (June + July + August) measure, Chart 7 shows a similar picture to Chart 5, but the 2005 Cohort are at lower levels than the Pilot States. While Chart 7 does show that the 2005 Cohort showed an increase during their first year in Simplified Summer, the Traditional SFSP States did as well.

The impact of Simplified Summer on meal counts cannot be disaggregated in the current evaluation from other impacting factors identified by the States. These include:

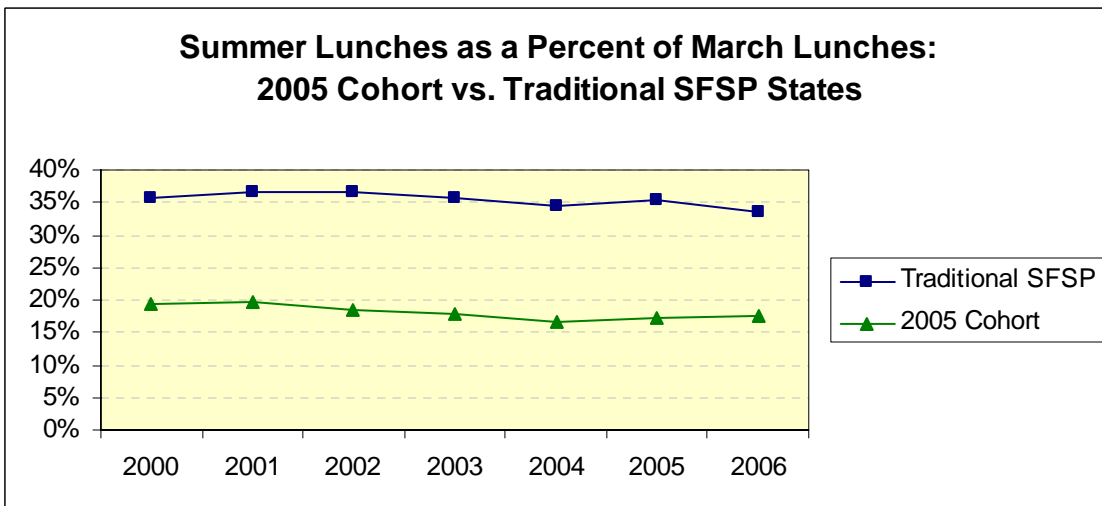
- Changes in meal counts are attributable by some States to population shifts of households due to economic relocation.
- Meal counts may not always rise in response to Simplified Summer as some States try to encourage sponsors to provide one good quality meal per day, rather than just increasing the number of meals offered.

Chart 6



Note: Louisiana not included due to Hurricanes Katrina and Rita

Chart 7



Note: Louisiana not included due to Hurricanes Katrina and Rita



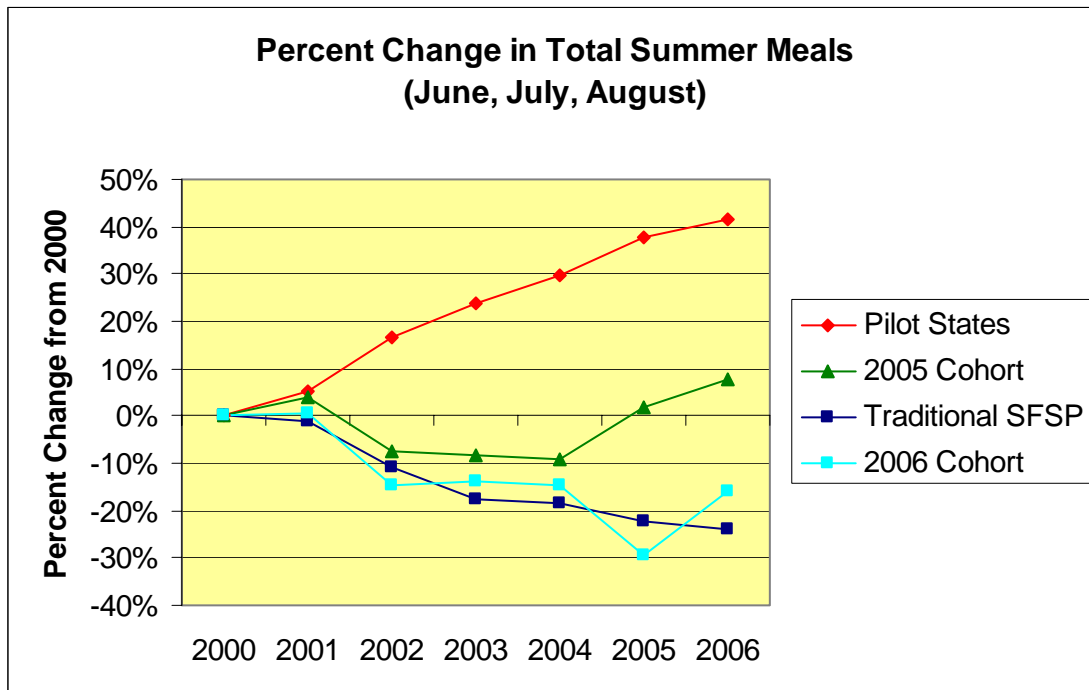
- Reductions in the number of volunteers for preparing, distributing and serving meals is also perceived by States as negatively impacting sponsors' meal offerings.
- Some States believe that private nonprofit sponsors may not always increase the number of meals that they offer in response to the program because they have limited backup funding. With funding or reimbursement for the meals linked to the number of children who actually attend, they cannot afford the cash losses that might occur if they overestimate the number of children who attend.

In addition to examining how the number of summer lunches compares to the number of school-year lunches, we also examine changes in the quantity of total meals served. This is the topic of the next section.

**Changes in Total Number of SFSP Meals Served**<sup>14</sup>

Chart 8, Figure 3 and Table 4 show the trends in the total number of SFSP meals served. Chart 8 shows that the States of the Pilot experienced over a 40 percent *increase* in total SFSP meals served during this time period. The total meals served in the States of both the 2005 and 2006 Cohorts were declining until they began operating under Simplified Summer procedures. The Traditional SFSP States experienced a 24 percent *decline* over this period.

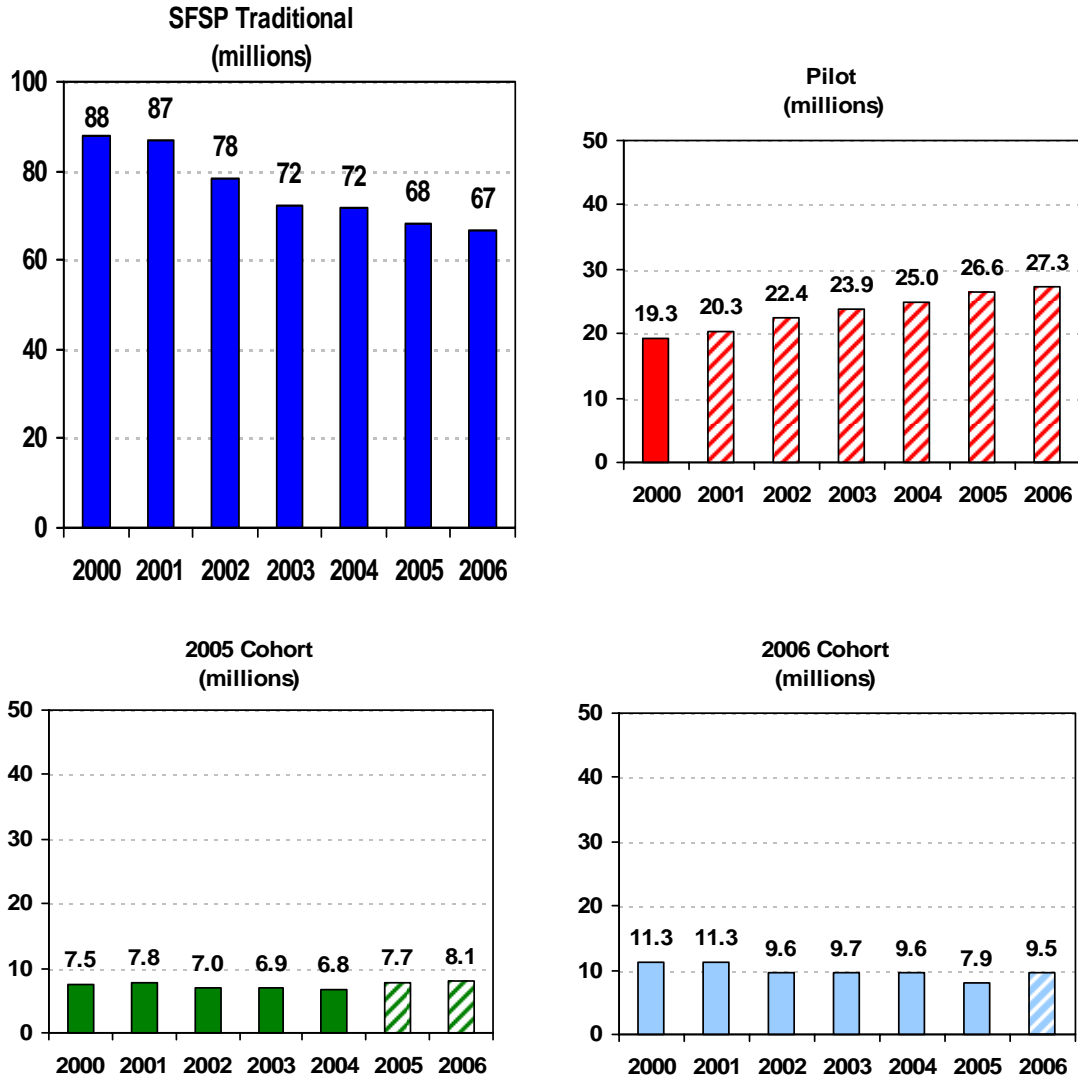
Chart 8



Note: Louisiana not included due to Hurricanes Katrina and Rita

<sup>14</sup> The total SFSP meals measure is defined as the sum of the number of breakfasts, lunches, suppers and snacks served by SFSP for June + July + August.

**Figure 3**  
 Summer Food Service Program  
 Traditional SFSP, Pilot, 2005 Cohort and 2006 Cohorts States  
*Total SFSP Meals June + July + August*  
 2000-2006



Note: Hatched bars represent years in Simplified Summer Food Program.

Source: USDA's Simplified Summer Food Program 2001-2006. USDA/FNS 2007

Table 4

<b>Total SFSP Meals June + July + August (Thousands)</b>							
	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
SFSP							
Traditional	87,760	86,688	78,426	72,315	71,586	68,387	66,740
Pilot	19,264	20,284	22,441	23,865	25,024	26,552	27,267
2005 Cohort	7,529	7,826	6,971	6,900	6,842	7,679	8,103
2006 Cohort	11,254	11,306	9,604	9,684	9,596	7,921	9,484
<b>TOTAL</b>	<b>125,806</b>	<b>126,104</b>	<b>117,442</b>	<b>112,765</b>	<b>113,048</b>	<b>110,538</b>	<b>111,594</b>

Of the sixteen States that participated in the telephone discussions: three (19%) expressed an opinion that Simplified Summer has an impact on increasing the number of meals served because more meals result in more money to the sponsors. Some States feel that the program could have a positive impact on meal counts because the expected level of reimbursement is more predictable under Simplified Summer. This is identified by some of the States as a positive factor in encouraging sponsors to expand their programs. Seven States (44%) did not know whether or not Simplified Summer has an impact on meal counts and six (38%) felt that it did not.

States that could not perceive a positive impact on meal counts stated that costs to sponsors of providing the meals outweigh the reimbursements, negating any incentive to increase the number of meals. The net result is that States often cannot attribute changes in the number of meals served to Simplified Summer, other than increases in meal counts due to increases in the number of sponsors.

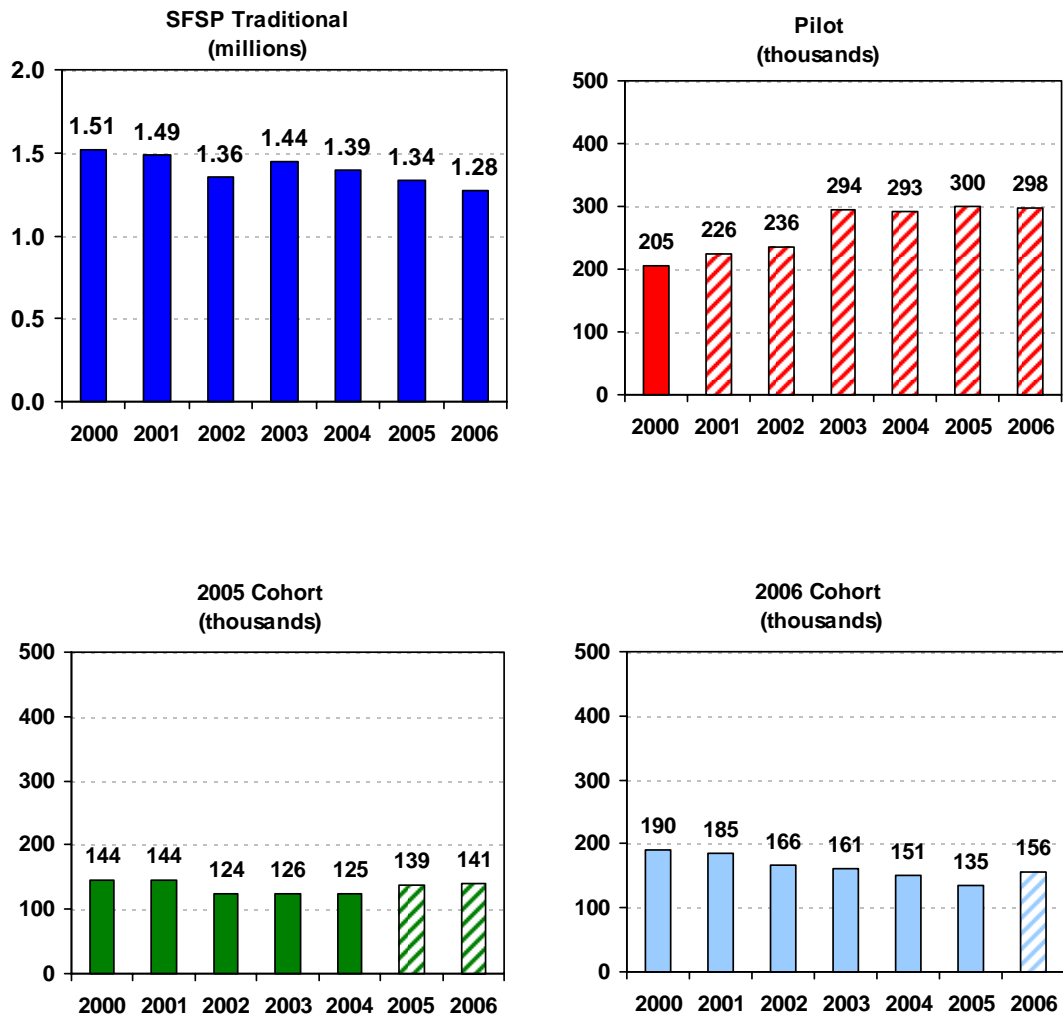
#### **Change in Number of Children Served (Average Daily Attendance)**

The legislative intent is that having more sponsors will in fact lead to more low-income school-age children receiving subsidized nutritious meals during the summer. Growth in average daily attendance of children has also taken place in States participating in Simplified Summer, contrasting to a decline in the Traditional SFSP States (Table 5 and Figure 4).

Table 5

<b>SFSP Average Daily Attendance in July</b>							
	<b>2000</b>	<b>2001</b>	<b>2002</b>	<b>2003</b>	<b>2004</b>	<b>2005</b>	<b>2006</b>
Traditional SFSP	1,514,383	1,491,491	1,355,402	1,442,922	1,390,587	1,336,863	1,275,267
Pilot	204,847	225,512	235,996	293,781	292,837	299,824	297,783
2005 Cohort	144,395	144,182	124,078	125,554	125,038	138,756	141,434
2006 Cohort	190,186	185,166	166,381	160,781	151,061	135,016	156,229
<b>Total</b>	<b>2,053,811</b>	<b>2,046,351</b>	<b>1,881,857</b>	<b>2,023,038</b>	<b>1,959,523</b>	<b>1,910,459</b>	<b>1,870,713</b>

**Figure 4**  
 Summer Food Service Program  
 Traditional SFSP, Pilot, 2005 Cohort and 2006 Cohort States  
*Average Daily Attendance in July*  
 2000-2006



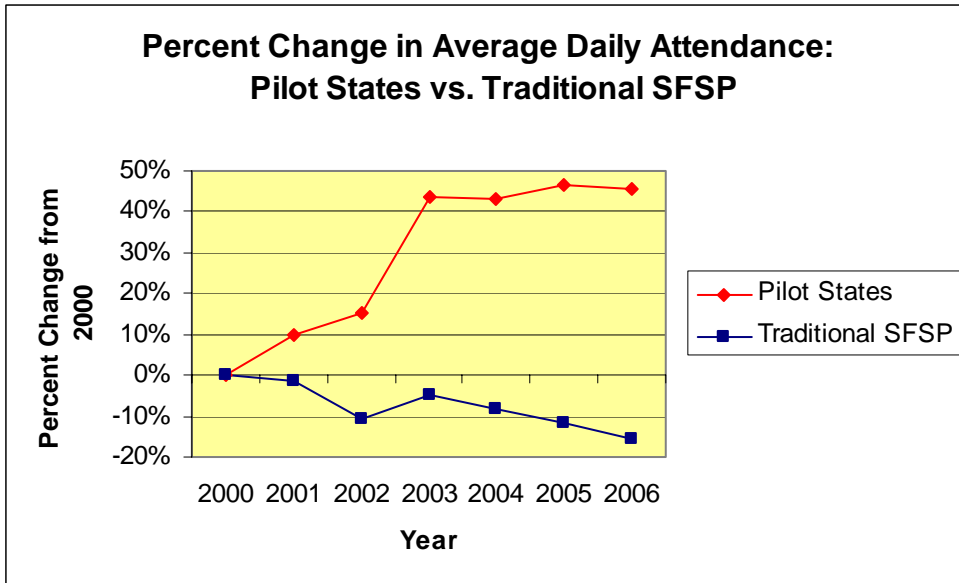
Note: Hatched bars represent years in Simplified Summer Food Program.

Source: USDA's Simplified Summer Food Program 2001-2006. USDA/FNS 2007

Again, the effect of the Simplified Summer rules is most evident in the Pilot States. Chart 9 shows the percent change in average daily attendance in the Pilot States vs. the Traditional SFSP States.

- The Pilot States have maintained an increase in average daily attendance over 2000 levels of more than 40 percent while average daily attendance in the Traditional SFSP States has declined more than 15 percent.

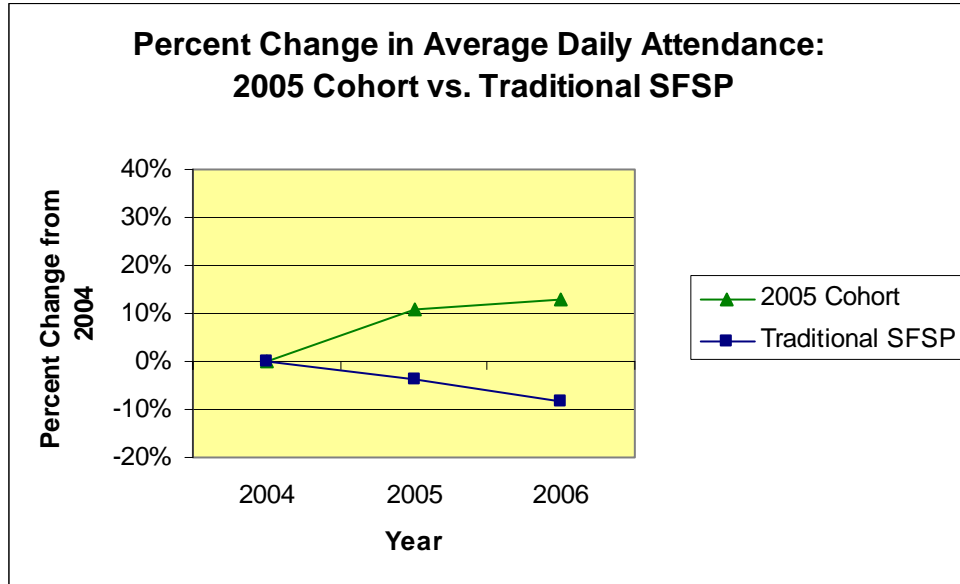
Chart 9



Note: Louisiana is not part of either group.

Excluding Louisiana, average daily attendance increased by over 10 percent among the States in the 2005 Cohort while attendance declined among the Traditional SFSP States (Chart 10).

Chart 10



Note: Louisiana not included due to Hurricanes Katrina and Rita

Only one State surveyed in the telephone discussions felt that Simplified Summer directly impacts the number of children served, other than as a consequence of the changes in the number of sponsors or number of food service sites per sponsor. Nine States were unsure of the impact of the program on average daily attendance, while six States felt it had no impact (Appendix B). Factors outside of the program, such as the weather, availability of program activities, and length of operation, were felt to have more impact on the number of children served. Even the variation from year-to-year in the number of snow make-up days per school year was identified as affecting the length of operation of the summer food programs and the number of children ultimately served.

## **Chapter 3 – Perceived Effects of the Simplified Summer Food Program**

This chapter examines several aspects of the Simplified Summer Food Program for which quantitative data are not available. The effects are potentially important, however, and were addressed in the telephone discussions with the sixteen States.

### **Length of Service (time period for which service is provided in the summer)**

Nine of the sixteen States participating in the telephone discussions do not perceive Simplified Summer as having an impact on the time period during the summer when sponsors' operate their food programs. Only two States felt that the program had some impact on sponsors' periods of operation in the summer (Appendix B). Several States noted that some sponsors have started up their operations earlier in June and continued them into August.

States report that sponsors' periods of summer operation are more affected by the shifting ending and beginning dates of the school year, scheduled dates of summer school operation or sponsors' program activities, weather or temperature related factors, operating resources, and availability of volunteer support.

### **Number of Days Meal Service Provided**

Almost all of the States (15 out of 16) reported in the telephone discussions that the number of days for which meal service is provided by a sponsor, during a typical week, is contingent on factors outside of Simplified Summer (Appendix B). States report that sponsors typically keep sites open 5 days a week; however, the number of operating days is often contingent on the days that activities are offered and the availability of volunteers to staff the food service sites.

### **Quality of Meals**

With only a few exceptions, States in the telephone discussions perceive that the quality of sponsors' meals is being maintained. Scheduled reviews and on-site visits to food serving sites by State monitoring staff as required in the SFSP regulations, is the major source of information on the quality of meals served by sponsors. Only one State out of sixteen believes that Simplified Summer's reimbursement of meals at a fixed rate will enable sponsors to improve the quality of their meals. Eight of the sixteen States (50%) did not know whether Simplified Summer has an impact on meal quality, with seven States believing that it has no impact on meal quality (Appendix B). These States noted that rising costs of food, labor, transportation, gasoline and declining levels of volunteer support offset some or all of the economic benefits provided by the meal reimbursement amounts of Simplified Summer.

### **Claims Process**

Almost all of the States (15 out of 16) reported in the telephone discussions that sponsors find the claims process, which does not require the submission of cost data when seeking reimbursement, easier and simpler under Simplified Summer (Appendix B). The reduction in paperwork is seen by the States as a strong selling point of Simplified Summer.

Simplification of the claims process has also simplified the States' job of training sponsors, freeing up time for marketing the program and performing other tasks in running the program. Under regular SFSP rules, some sponsors were not claiming all of their expenses and not getting full reimbursement for their costs. The reduced reporting requirements under Simplified Summer have enabled some States to also simplify their payment processing, creating manpower savings. Verifying claims submissions from sponsors is reported being easier, especially since costs do not have to be checked, as frequently, against budgets. However, not all States think that the program simplifies administrative paperwork at the State level. States are still required to review applications and budgets while conducting reviews of sponsors' operations and meal sites. Also, States that already automated their claims submission and payment systems before becoming eligible for Simplified Summer do not realize the full extent of time and labor savings realized by other States that have not automated their processing/payment systems.

### **Benefits to Children**

Many States try to encourage sponsors to locate food service sites near areas where an activity for children is available, such as a pool, library, church, school, or other youth group activities. One State noted that a school district started providing breakfast in the morning during summer school, something they were not doing prior to Simplified Summer. Another State felt that more activities are being offered now but attributes them to the recognition that activities and food enhance each other when offered together, not necessarily to the introduction of Simplified Summer. It is commonly recognized that tying the meal service to an activity increases children's level of participation.

States participating in the telephone discussion were split on whether Simplified Summer has an impact on the benefits offered to children, such as freeing up money for additional activities for the children. Six States (38%) felt that the program resulted in benefits to children that go beyond the food provided; while seven States (44%) felt that it did not (three States did not know – see Appendix B). Summer food programs and more healthful food, in general, were recognized as having a positive impact on kids. However, States were not able to articulate specific benefits for children, other than the core – and important – benefit of making food available to low-income children.

### **Changes in Alternative Funding for Food**

None of the States that participated in the telephone discussions reported that Simplified Summer is having a recognizable effect on sponsors' use of alternative funding to assist in covering their food costs (Appendix B). Several of the States feel that sources of alternative funding for food and the amount of funding are declining. Grant awards also come and go, impacting the amount of alternative money that sponsors have for funding their summer food programs.



### **Use of Donated Food or Very Low Cost Food**

It was reported that some sponsors receive fresh fruit and vegetables through the USDA's arrangement with the Department of Defense, but the amount of food obtained through this source appears to be very limited in the summer. None of the States participating in the telephone discussions expressed the belief that Simplified Summer results in an increased use of donated food or low-cost food (Appendix B). States report that most sponsors purchase their food through food vendors and grocery stores. One State has a policy of trying to steer sponsors away from donated foods because of health concerns. The same State also makes processed foods available to the sponsors at reduced rates.

It should be noted that some States find it difficult to track or observe sponsors' use of alternative funding or their use of donated or low cost food. Regulations do not require that every sponsor be reviewed each year.

### **Pattern of Operating and Administrative Costs and the Incidence of Non-Allowable Costs**

None of the States in the telephone discussions reported Simplified Summer negatively impacting sponsors' patterns of operating and administrative costs, other than the typical occurrences of non-allowable costs (Appendix B). Some of the interviewed States are more concerned that sponsors increase their level of spending, especially in the area of monitoring activities, to maintain the integrity of the program and the quality of the food offerings.

Some of the States that were new to Simplified Summer in 2006 are not yet fully aware of its impact on sponsors' costs as they have not had an opportunity to review their operating budgets. Budget and program reviews of sponsors will not take place in some of the States until the spring and summer of 2007.

Regarding private nonprofit sponsors, States note that they often operate year-round and their administrative costs have to be paid even if they do not receive funds from Simplified Summer. Therefore, States that participated in the telephone discussions did not perceive private nonprofit sponsors to be of any greater source of concern than other sponsors when monitoring expenditures and reimbursements.

### **Need to Request Restoration of Funds Back Into the Nonprofit Food Service Accounts**

States note that the need for sponsors to restore funds is not occurring because food purchase, preparation and delivery costs are rising faster for the sponsors than the dollar amounts made available in program reimbursements.

- When administrative and labor cost overruns occur, States report that they are due, at least partly, to the need to use paid labor, rather than volunteers. There are difficulties in maintaining a program over the days, weeks and months of summer by volunteer labor.
- States note that it is hard to find and keep volunteers on a regular basis over the summer to operate the summer program on a predictable schedule. Sponsors attempt to cover the increases in food and administrative costs through their other sources of funding.

- Only one State in the telephone discussions alluded to issues relating to the need to take action against a sponsor to initiate the paying back of advances.

Sponsors are also perceived by States as doing a better job documenting their allowable costs which often, if not always, exceeds the amount of reimbursement from Simplified Summer.

Administrative reviews by the States often occur in the middle of the summer, not at the end, making it difficult to know the extent of excess funds until the following summer. Some States find it difficult, if not impossible, to track excess funds and how they are used by sponsors in the future.

### **Seamless Summer Option (SSO)**

Some of the States participating in the telephone discussions have school sponsors operating under the SSO. The SSO combines features of NSLP, SBP and SFSP. Meals served under the SSO are reimbursed at the NSLP and/or SBP "free" rates, which are lower than the SFSP rates. State perceptions include:

- Simplified Summer is competing for school sponsors and children with the SSO. In the telephone discussions, States with school districts participating in the SSO of the NSLP have seen movement of their school sponsors, from several to upwards of thirty plus school districts, to Simplified Summer. This trend is likely to continue as school districts receive feedback on the ease of record keeping and financial benefits under Simplified Summer and as food management contracts come up for renewal.
- Other school sponsors under the SSO are expected to move to Simplified Summer after their current contracts with food management companies have expired, so as not to have to renegotiate existing contracts.
- One State reported that food service directors prefer the SSO because it is more comparable to what they are already doing during the school year, while school administrators are more concerned about which program has the higher level of reimbursement.
- Several States reported that some of their school districts operating under the SSO do not want to open their programs up to children in the community who are not attending summer school; therefore, these school districts are unlikely to move to Simplified Summer. Some States report that some school districts restrict their summer school food programs because of difficulty in estimating their costs if their programs were opened to other children in the community.

## Chapter 4 – Conclusions

In discussion interviews, States range from enthusiastic for Simplified Summer's potential to assist in recruiting and retaining sponsors to the perception that it is a bookkeeping change with minimal program impact. Some States believe that Simplified Summer has a positive impact and benefit on the availability of food for children during the summer, but they can't verify or quantify its impact.

The quantitative analyses in this report, however, show that many positive changes in key outcome measures of summer food programs have been taking place in the States that have participated in Simplified Summer.

- **The Number of Sponsoring Organizations Has Increased in the Simplified Summer States.** The States that have been operating under Simplified Summer procedures since 2001 have maintained about a 30 percent increase in sponsors while States that have never been eligible to operate under Simplified Summer rules (Traditional SFSP) show a small decline.
- **The Number of Food Service Sites Per Sponsor Is Improving in the Simplified Summer States.** In the Pilot States, the number of food service sites per sponsor rose from 5 in 2000 to almost 7 in 2006, narrowing the gap with the Traditional SFSP States which average around 10. However, only four of the sixteen States participating in the telephone discussions feel that Simplified Summer procedures resulted in sponsors opening more food service sites. State and community outreach efforts, sustained growth over time by existing sponsors, and demand for services (in areas where sponsors have the capacity to expand) are some of the other reasons suggested by the States for explaining the growth in the number of food service sites.
- **Total SFSP Meals Served Has Increased in Simplified Summer States.** Pilot States experienced over a 40 percent *increase* in total meals served during this time period. The total meals served in both the 2005 and 2006 Cohorts were declining until they began operating under Simplified Summer procedures. Traditional SFSP States experienced a 24 percent *decline* from 2000 to 2006.
- **The Number of Children Served Has Increased in Simplified Summer States.** The Pilot States have maintained an increase in SFSP average daily attendance over 2000 levels of more than 40 percent while average daily attendance in the Traditional SFSP States has declined more than 15 percent. However, only one State surveyed in the telephone discussions felt that Simplified Summer directly impacts the number of children served, other than as a consequence of the changes in the number of sponsors or number of food service sites per sponsor. Factors outside of the program, such as the weather, availability of program activities, and length of operation, were felt to have more impact on the number of children served.
- **Participating States Perceive That Meal Quality Is Being Maintained Under Simplified Summer.** States in the telephone discussions perceive that the quality of sponsors' meals is being maintained. Only one State out of sixteen believes that Simplified Summer's reimbursement of meals at a fixed rate will enable sponsors to improve the quality of their meals. Other States note that rising costs of food, labor, transportation, gasoline and declining levels of volunteer support offset some or all of the economic benefits provided by the meal reimbursement amounts of Simplified Summer.

- **Program Integrity Is Being Maintained Under Simplified Summer.** No State in the telephone discussions reported Simplified Summer negatively impacting sponsors' patterns of operating and administrative costs. In addition, the interviewed States did not perceive private nonprofit sponsors to be of any greater concern than other sponsors when monitoring expenditures and reimbursements. States noted that sponsors have not needed to restore funds to Simplified Summer because food purchase, preparation and delivery costs are rising faster for the sponsors than the dollar amounts made available in program reimbursements.

While many positive outcomes have occurred, States perceive that challenges remain.

- States report that sponsors with large rural populations experience difficulty in growing their programs, even under Simplified Summer. The interviewed States report that the greater need for transportation in rural areas to get the food to the children, or the children to the food, limits sponsors' ability to reach additional children and places limits on their ability to increase the number of meals served.<sup>15</sup>
- Some States predict that growth in sponsors and food service sites will be limited, especially in rural areas, until the threshold for site eligibility is lowered. The current standard for eligibility of most food service sites is set at 50 percent eligibility for free or reduced price school meals for the area served by an open site or for the group of children attending an enrolled site. The States that expect limited growth perceive that fluctuations in the percent of students eligible for free or reduced price meals, which affects site eligibility for Simplified Summer, results in some sponsors entering the program but dropping out in subsequent summers if the 50 percent threshold is not met.<sup>16</sup>
- Some of the States are concerned that sponsors increase their level of spending, especially in the area of monitoring activities, to maintain the integrity of the program and the quality of the food offerings.

## Summary

States participating in the Simplified Summer Food Program have shown positive changes in key outcome measures of summer food programs, such as number of sponsors, number of food service sites per sponsor, total SFSP meals served, and average daily attendance. At the same time, in 2004 the Seamless Summer Option was authorized under the NSLP. In addition, private nonprofit sponsors were allowed to participate in Simplified Summer for the first time. Therefore, while suggestive, changes in the number of sponsors and other outcome measures cannot be attributed to Simplified Summer with certainty based on the available data.

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<sup>15</sup> The Child Nutrition and WIC Reauthorization Act of 2004 authorized USDA to provide up to \$4 million in grants for innovative approaches in overcoming limited transportation resources in rural areas for the SFSP. Under this authority, in December 2005, USDA awarded multi-year grant funds to five States, including four Simplified Summer States – Mississippi, Oregon, Texas, and West Virginia.

<sup>16</sup> A special project authorized by Section 116(c) of Public Law 108-265, The Child Nutrition and WIC Reauthorization Act of 2004, is testing reduction of the SFSP eligibility limit from 50 percent or more free or reduced price to 40 percent or more in one State (Pennsylvania). A report to Congress on this project is due by January 1, 2008.

## **Appendices**

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## Appendix A – Telephone Discussion Questions

1. Did the number of SFSP sponsors in your State increase/decrease between 2005 and 2006?

a. *If yes, what factors produced this change?*

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2. What impact did the introduction of the Simplified Summer Food Program have on the number of sponsors?

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3. Did the Simplified Summer Food Program have an impact/effect on **(If yes, what was the impact - increase, decrease, other changes):**

- a. Number of sites?
- b. Number of meals served?
- c. Number of children served?
- d. Length of service?
- e. Quality of meals? **(If "yes," explain)**

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- f. Claims process? **(If "yes," explain)**

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- g. Number of days on which meal service was available **(If "yes," explain)**

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4. *Why/how do you believe that the Simplified Summer Food Program produced the change(s)?*

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5. Do you have any observations or comments that you would like to share about the impact that the Simplified Summer Food Program will have or is likely to have on:

- a. Number of sponsors?

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- b. Retention of current sponsors?

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- c. Number of sites?



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- d. Number of meals served?

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- e. Number of children served?

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- f. Other areas of impact?

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6. What effect has the Simplified Food Program had on "benefits to children" ?

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7. What effect has the Simplified Summer Food Program had on changes in alternative funding for food?

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8. What effect has the Simplified Summer Food Program had on the use or supply of donated food or very low cost food?

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9. Has the Simplified Food Program had any effect on the pattern of operating and administrative costs or the incidence of unallowable costs?

**(If "yes," explain)**

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10. Have you had to request in 2006 that a sponsor restore funds back into the nonprofit food service accounts?

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11. Did you have "private nonprofit" organizations as sponsors in the summer of 2006?

a. If yes, how many?

b. *How did they (private nonprofit sponsors) perform (food quality, ratio of administrative costs/operational costs, allowable costs, maintenance of account funds)?*

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*c. Did they (private nonprofit sponsors) have excess funds (reimbursement exceeds their costs)?*

*d. Unused funds?*

*e. If so, how were the recovery of funds handled?*

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*f. Do you expect them (private nonprofit sponsors) to return next summer?*

*g. Are you aware of any who will not be returning? (If yes, how many and why?)*

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12. Have we missed any issues, areas of concern, unintended consequences of the Simplified Summer Food Program that you feel should be examined in more detail?

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## Appendix B – Counts of Responses to Telephone Discussion Topics

### Counts of Responses to Telephone Discussion

#### Topics

	Yes	No	DK	Total
<b>Q. 2 Number of Sponsors</b>	56.3%	31.3%	12.5%	100.0%
Number of States Responding	9	5	2	16
<b>Q.3a Number of Sites</b>	25.0%	37.5%	37.5%	100.0%
Number of States Responding	4	6	6	16
<b>Q.3b Number of Meals Served</b>	18.8%	37.5%	43.8%	100.0%
Number of States Responding	3	6	7	16
<b>Q.3c Number of Children Served</b>	6.3%	37.5%	56.3%	100.0%
Number of States Responding	1	6	9	16
<b>Q.3d Length of Service</b>	12.5%	56.3%	31.3%	100.0%
Number of States Responding	2	9	5	16
<b>Q.3e Quality of Meals</b>	6.3%	43.8%	50.0%	100.0%
Number of States Responding	1	7	8	16
<b>Q.3f Claims Process</b>	93.8%	0.0%	6.3%	100.0%
Number of States Responding	15	0	1	16
<b>Q.3g Number of Days</b>	6.3%	93.8%	0.0%	100.0%
Number of States Responding	1	15	0	16
<b>Q.6 Benefits to Children</b>	37.5%	43.8%	18.8%	100.0%
Number of States Responding	6	7	3	16
<b>Q.7 Alternative Sources of Funds</b>	0.0%	93.8%	6.3%	100.0%
Number of States Responding	0	15	1	16
<b>Q.8 Use of Donated/Low Cost Food</b>	0.0%	87.5%	12.5%	100.0%
Number of States Responding	0	14	2	16
<b>Q.9 Operating/Administrative Costs</b>	0.0%	87.5%	12.5%	100.0%
Number of States Responding	0	14	2	16
<b>Q.10 Need to Restore Funds</b>	6.3%	93.8%	0.0%	100.0%
Number of States Responding	1	15	0	16
<b>Q.12 Aware of Nonprofits Not Returning</b>	12.5%	62.5%	25.0%	100.0%
Number of States Responding	2	10	4	16
	<b>Better</b>	<b>Lower</b>	<b>Same</b>	
<b>Q.11b Nonprofit's Performance</b>	12.5%	6.3%	81.3%	100.0%
Number of States Responding	2	1	13	16

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## Appendix C – Additional Detail on Methodology

### Quantitative

The present evaluation covers the States of the Pilot, and the States of the 2005 Cohort and 2006 Cohort. Quantitative program data on meals served was submitted by the States to FNS for March, June, July and August from 2000 to 2006. Data used in this report were current as of March 22, 2007. July is the FNS reporting period for data on the number of sponsors, food service sites, and average daily attendance. The summer food program data is maintained on FNS' National Data Bank (NDB). However, summer food service data is not available in the NDB for the month of May. We therefore miss some data for those States in which their sponsors began their summer programs in May.

The difference in the length of time of participation in Simplified Summer by the Pilot States and the 2005 Cohort and the 2006 Cohort necessitated the presentation of separate tables for each of these groups of States on each of the key program outcome measures. Comparisons are generally made to “Traditional SFSP” States, which are the twenty-four States, District of Columbia, and the Virgin Islands that have never been eligible to operate the SFSP under Simplified Summer rules. The Pilot, 2005 Cohort, 2006 Cohort, and Traditional SFSP groups sum to all States plus Puerto Rico.

### Calculation of Percentages Displayed in Charts 4 and 6

The numerator of the percentage = [the sum of free and reduced price lunches under the NSLP for July + SFSP lunches for July] ÷ [the number of operating days in July.]

The number of operating days in July is the number of non-holiday weekdays in the month. Unlike the comparable figures for March, the July operating days figures are not state specific. There are too few sites reporting summer meals to permit the computation of meaningful state-specific operating days estimates.

The denominator of the percentage = [the sum of free and reduced price lunches under the NSLP for March] ÷ [the number of operating days in March.]

The number of operating days in March is computed separately by state. It is equal to a state's total number of NSLP lunches divided by its reported average number of lunches served per day.

### Calculation of Percentages Displayed in Charts 5 and 7

The numerator of the percentage =  
{ [NSLP free and reduced price lunches for June + SFSP lunches for June] ÷ [the number of operating days for June] +  
[NSLP free and reduced price lunches for July + SFSP lunches for July] ÷ [the number of operating days for July] +  
[NSLP free and reduced price lunches for August + SFSP lunches for August] ÷ [the number of operating days for August] } ÷ 3

The number of operating days in June, July, and August are the number of non-holiday weekdays in those months. Unlike the comparable figures for March, the summer operating days figures are not state specific. There are too few sites reporting summer meals to permit the computation of meaningful state-specific operating days estimates.

The denominator of the percentage = [the sum of free and reduced price lunches under the NSLP for March] ÷ [the number of operating days in March.]

The number of operating days in March is computed separately by state. It is equal to a state's total number of NSLP lunches divided by its reported average number of lunches served per day.

### **Qualitative**

The current evaluation also draws on feedback obtained through telephone discussions conducted in September and October of 2005 and 2006 with sixteen of the twenty-six States and the Commonwealth of Puerto Rico that are eligible for Simplified Summer (Arizona, Colorado, Indiana, Iowa, Kansas, Kentucky, Michigan, Nebraska, New Hampshire, North Carolina, Ohio, Oklahoma, Oregon, Texas, West Virginia, and Wisconsin). The telephone discussions were conducted separately with each State. A copy of the guide for the telephone discussions is included in Appendix A. States designated who they wished to participate in the telephone discussions. Most States nominated multiple representatives for the telephone discussions that included the program coordinator at the State level, along with individuals who promoted and monitored summer food program activities for their individual States.

The telephone discussions aid in understanding how the summer food programs work in the States and specifically, the workings and impact of Simplified Summer. Information derived from the telephone discussions provides useful insights into program activities and areas of impact that could not be obtained through examination of the quantitative program data available in FNS' NDB. The Office of Analysis, Nutrition and Evaluation (OANE) was requested to tally States' perceptions of the impact of Simplified Summer on key program outcome measures. A summary of those counts is made available in Appendix B. However, the telephone discussions were only designed to provide additional information and insights. The States that participated in the telephone discussions are not a random sample of all Simplified Summer States and therefore may not be representative of Simplified Summer as a whole.



## Appendix D – Louisiana Data

Louisiana started to operate under Simplified Summer procedures in 2005 – the year of Hurricanes Katrina and Rita. Because of the devastating effect of the storms on the State’s infrastructure, we do not have a true account of the impact of Simplified Summer in the State. We therefore do not include Louisiana in the analyses in this report. The data for Louisiana on key outcome measures are provided in the table below.

<b>Summer Food Service Program Figures for Louisiana</b>				
<b>Fiscal Year</b>	<b>Number of Sponsors (July)</b>	<b>Number of Sites (July)</b>	<b>Number of Meals (June, July, August)</b>	<b>Average Daily Attendance (July)</b>
<b>2000</b>	73	471	3,256,166	48,875
<b>2001</b>	67	505	2,856,109	43,675
<b>2002</b>	61	521	3,027,064	41,345
<b>2003</b>	59	481	3,161,772	46,668
<b>2004</b>	61	527	3,078,622	37,391
<b>2005</b>	70	640	3,395,217	34,885
<b>2006</b>	51	258	2,428,772	26,414

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## Glossary of Acronyms

<u>Acronym</u>	<u>Definition</u>
<b>FNS</b>	Food and Nutrition Service
<b>OANE</b>	Office of Analysis Nutrition and Evaluation
<b>NDB</b>	National Data Bank
<b>SFSP</b>	Summer Food Service Program
<b>Simplified Summer</b>	Simplified Summer Food Program
<b>Pilot</b>	The thirteen States plus Puerto Rico that began operating under Simplified Summer rules in 2001 as part of the Lugar Pilot Project.
<b>2005 Cohort</b>	The six States that began operating under Simplified Summer rules in 2005. While Louisiana is one of these States, due to the impact of Hurricanes Katrina and Rita in 2005, it is not included in the data analyses.
<b>2006 Cohort</b>	The seven States that began operating under Simplified Summer rules in 2006.
<b>Traditional SFSP</b>	The twenty-four States, District of Columbia, and the Virgin Islands that have never been eligible to operate the SFSP under Simplified Summer rules. The Pilot, 2005 Cohort, 2006 Cohort, and Traditional SFSP groupings account for all States plus Puerto Rico, the District of Columbia, and the Virgin Islands.
<b>NSLP</b>	National School Lunch Program
<b>SBP</b>	School Breakfast Program
<b>SSO</b>	Seamless Summer Option