



#### Testimony

Submitted to The Committee on Agriculture, Nutrition, and Forestry United States Senate

#### Hearing

*"Perspectives on Child Nutrition Reauthorization"* Wednesday, April 10, 2019 216 Hart Senate Office Building

# Statement of Mr. Michael J. Halligan

Michael J. Halligan Chief Executive Officer God's Pantry Food Bank, Inc. 1685 Jaggie Fox Way Lexington, KY 40511-1084 mhalligan@godspantry.org Tel. (859) 255 – 6592

Dear Chairman Roberts, Ranking Member Stabenow and distinguished Members of the Committee:

Thank you for the invitation to attend today's hearing. My name is Mike Halligan. I serve as CEO for God's Pantry Food Bank in Lexington, Kentucky. I've had the good fortune to benefit from more than 35 years of experiences in the food and grocery product industry through a number of roles across manufacturing, corporate, and non-profit sectors. Over the years, my hunger-relief service includes activities as a volunteer, a donor, a board member, an employee, and an executive leader. Today, I am both honored and humbled to testify on behalf of more than an estimated quarter million food insecure Kentuckians, including nearly 72,000 hungry children who reside in Central and Eastern Kentucky<sup>i</sup>.

My remarks will address the critical role federal afterschool and summer feeding programs play in addressing childhood hunger throughout the year. While I will focus on these two federal programs, I in no way intend to diminish the importance or the significant impact of nutritious food and meal programs that assist families with children in child care and during school or pregnant women, infants and toddlers served through critical initiatives such as the Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program (NSLP), the Special Supplemental Nutrition Program for Women, Infants and Children (WIC) and others. My intent is to share insights about the role God's Pantry Food Bank and other food banks play while addressing childhood hunger in communities through innovative public-private partnerships as well as how the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) are key in those efforts.

# **Background**

God's Pantry Food Bank provides hunger-relief services across a 16,000 square mile, geographically diverse, 50 county service area. This region of Kentucky includes 30 rural, 14 small town, and 6 metro counties.<sup>ii</sup> Eleven of the counties are among the 50 counties in the U.S. with the lowest median incomes.<sup>iii</sup> The Food Bank directly serves many of those who are hungry in our region with much needed food assistance and also provides food, grant assistance, programming, and capacity support to more than 400 partner food panties and meal programs that also directly serve those in need. We are one of seven members of the Feeding Kentucky network who provide a broad array of hunger-relief services across the Commonwealth. We are also one of 200 members of the Feeding America national network who provide similar services through 60,000 food programs including food pantries, soup kitchens, shelters, afterschool programs, summer feeding sites, and many other hunger-relief services.<sup>iv</sup> Like the colleagues testifying here today, we work daily to address childhood hunger in our country.

Food insecurity in our service area and, in fact, across our country continues to be a significant concern with a staggering number of people and children who are affected as shown in Table 1:

	Central & Eastern KY	Kentucky	United States			
Food Insecurity	253,460	685,830	41,204,000			
Childhood Hunger	71,850	194,440	12,938,000			

Table 1, Food Insecurity<sup>v</sup>

Sadly, in Central and Eastern Kentucky 1 in 5 children may not know when or where they'll receive their next meal.<sup>vi</sup> Nationally the risks are also sobering with 1 in 6 children unsure when they might eat again.<sup>vii</sup> Though not always visible, childhood hunger remains a significant problem in the United States. Millions of families do not have the resources to purchase the food that they need. In most of these families, parents protect children from hunger. Though their children may not get the nutritional quality or variety that they need for proper health and development, parents will reduce their own portion sizes or skip meals to protect children from actual hunger pangs. Several years ago there was a poignant story that aired on a nationally broadcast news magazine show that will forever be etched in my mind. The mother's stated goal during the interview was simply not to have to cut her milk with water in order to make ends meet! More recently, a Feeding America study found that 91 percent of households accessing charitable food programs in my home state of Kentucky reported that they opted to purchase inexpensive, unhealthy food to make ends meet.<sup>viii</sup> Nutritional food is a basic need. We must end hunger.

Fortunately, the United States has a robust and complementary set of federal child nutrition programs to protect children from hunger and promote improved nutrition and health. Since their implementation in the 1960s, federal child nutrition programs serving children outside of school hours complemented the National School Lunch Program established in the 1940s. Together, the child nutrition programs have been successful in reducing the hunger and extreme malnutrition that we saw in the United States several decades ago.

For more than 40 years, CACFP and SFSP have been critical federal Child Nutrition programs that have helped bridge nutritional gaps experienced by hungry children. In Kentucky, CACFP at-risk meals helped



provide food to some 17,000 children in October of 2017.<sup>ix</sup> Table 2 shows the scope of afterschool and summer meal program support from school districts, day cares, YMCAs, food banks, public libraries and so many other compassionate and dedicated organizations, staff members, and volunteers over the past year:

	Sponsors	Sites	Average Daily Site Attendance	Snacks & Meals	
CACFP (At Risk Site Data)	79	443	17,219	3,034,567 (~ 42 weeks)	
SFSP	166	2,602	80,847	2,998,901 (~ 10 weeks)	

### Table 2, Kentucky CACFP and SFSP Scope<sup>x,xi,xii</sup>

Comparing this data, particularly the SFSP data, to National School Lunch Program data reveals how structural and administrative limitations along with site availability and recipient constraints may be impacting SFSP participation rates and successes. During the 2017-2018 school year the NSLP in Kentucky averaged between 7.0 and 7.2 million meals each month.<sup>xiii</sup> However, the 2018 Summer Food Service Program in Kentucky only averaged between 1.2 and 1.4 million meals in June and July (about 18% of NSLP).<sup>xiv</sup>

Child nutrition programs are only effective when they reach the children who need help. Frequently programs targeting children during out-of-school times, like the Summer Food Service Program (SFSP) and the Child and Adult Care Food Program (CACFP), fail to reach the majority of children in need of food assistance.

Closer to home, God's Pantry Food Bank sponsors 12 afterschool sites under CACFP including 3 YMCAs, 3 libraries, 3 churches, and 3 other afterschool enrichment programs (one of which is a creative mentoring program offered to youth by students at the University of Kentucky). We also sponsored 31 summer feeding sites in eight counties last summer under SFSP including 6 low-income housing complexes, 4 libraries, 4 YMCAs, 11 churches, and 6 parks/community centers/other. Ten of the sites we sponsor provide year-round services under both CACFP and SFSP. In addition to these critical Child Nutrition programs the food bank sponsors 19 Back Pack Programs in two counties and supports several more of these privately funded programs across our service area. These programs provide critical weekend sustenance to children who receive meals through the National School Lunch Program during the week but are currently not reimbursed through federal child nutrition programs due to restrictive structures. Our hope is that we will be able to fund and continue growing afterschool, summer feeding, and weekend programming, but our work to do so would be significantly strengthened by changes in federal policy. Improving CACFP and SFSP efficiencies and simplifying program requirements as outlined below will serve as much needed catalysts to ensure hungry children receive sound nutrition throughout the year.

# **Innovation and Policy Solutions**

There are several policy changes Congress should make that would help reach more children during the summer, after school, and on weekends. We need a two-part strategy to reach children when they are out of school. First, we need to strengthen the site-based model by streamlining federal programs and making it easier for schools and community providers to expand the number of sites available to children. Second, we need to allow communities to adopt alternate program models to fill the gap where children cannot otherwise access a meal.



# **Strengthen the Site-Based Model**

To strengthen the site-based model and reach more children when they are out of school, we recommend that community providers be able to operate one program year-round through SFSP which would reduce red tape and streamline federal programs. To further encourage more sites to participate, the area eligibility requirement used by many sites should be changed to make it easier for sites to operate in communities with concentrations of low-income children.

# Provide a Seamless Year-Round Options for All Sponsors

When addressing childhood hunger, one complex challenge we as providers face involves duplicate and inconsistent rules and regulations. As I have testified, we utilize two federal child nutrition programs: the Summer Food Service Program and the Child and Adult Care Food Program under the "at-risk" site provisions for CACFP. I'll try to simplify this by putting them in two categories, summer regulations and school year regulations. Quite often, we are feeding the same children in the same location, so one would think we would be operating under the same guidelines. That would be an incorrect assumption. The rules for one don't always apply to the other. The paperwork is different. The nutrition requirements are different. The reimbursement rates are different. The training is different. Even the calendars can be different from one school district to the next. Needless to say, it gets very confusing. Why not have a program with one set of rules and regulations to complement the National School Lunch Program for both summer and afterschool meals?

Today, we switch from SFSP in the summer to CACFP for the school year... and back again throughout the year. As a sponsor, this means attending two trainings ourselves and then training each site on the new guidelines, often for the same staff and same sites back-to-back. For staff at food banks and other non-profit and community providers throughout the country this means thousands of trainings, and an inefficient use of time. Compounding the differences in calendars are differences in reimbursement forms and even reimbursement amounts for each meal provided under SFSP or CACFP.

Sponsors often find themselves working within multiple state guidelines when you add in metropolitan areas with multiple school districts or food banks who serve across state boundaries, such as our Feeding Kentucky peer Freestore Foodbank in Cincinnati, who serves Ohio, Indiana, and Kentucky. Similarly, Facing Hunger Foodbank, another Feeding Kentucky member, with a more rural service area based out of Huntington, West Virginia works under guidelines to serve counties in West Virginia, Ohio, and Kentucky.

It can be challenging to find sites to operate throughout summer. Excessive red tape discourages many organizations from becoming permanent meal sites. Many sponsors find that a site will only choose to operate under one of the two programs. Others choose not to offer a program at all!

Let's talk about nutritional requirements. First of all, I think they are a good thing. Having meal guidelines means that we know the meals are nutritious. We can't serve Kool-Aid and cookies for lunch, which means the kids are receiving a meal that always has protein, grains, vegetables, fruits, and dairy.



But sometimes those guidelines become very confusing when they are different between programs. The people who are working or volunteering at feeding sites are not food and nutrition professionals for the most part. This is not meant to be critical of them. We have many wonderful community volunteers, librarians, or child care providers that work to provide meals. The difference between programs leads to unnecessary challenges in menu planning, despite training and support from the sponsor. Is it ½ cup vegetables plus ¼ cup fruit or ¾ cup mixed fruit? A nutritionist will tell you that the child's body doesn't know the difference between vitamin A in a carrot or in an apricot, but the current regulations differentiate between the two programs. And when the same site provides meals during the school year and during the summer, there are real challenges to making sure they're following the correct requirements as they're forced to switch back and forth between SFSP and CACFP.

Wouldn't it be more efficient administratively to simply declare a breakfast a breakfast, a lunch a lunch, a supper a supper, and a snack a snack? I don't think a hungry child, or even a consumer in general, thinks about any of these meals any differently over the course of a year.

These high administrative burdens coupled with low reimbursement can make sponsors shy away from participation, resulting in fewer feeding sites for kids. Likewise, these confusing regulations can make volunteers less likely to participate, which can be detrimental to those kids who might be unsupervised after school or during the summer if it were not for these feeding sites. After 50 years, it's time to align these two programs into one seamless year-around program for all sponsors and sites to administer.

# Align Area Eligibility Across Federal Summer Programs

Another way to expand the number of sites available to children would be to change the area eligibility criteria to allow more sites in low-income areas to operate. To qualify currently as an open site, a site must meet the area eligibility test – located in an area where at least 50 percent of school children are eligible for free or reduced-price meals (at or below 185 percent of poverty). While sponsors keep track of the number of children and meals served each day, they do not collect individual income-eligibility data. This reduces the sponsors' paperwork, increasing their likelihood of participation and allowing them to focus on site enrichment activities and nutritious meals.

However, the 50 percent threshold is inconsistent with other federally funded summer programs, such as the 21st Century Community Learning Center programs and Title 1, which require at least 40 percent. Better aligning the eligibility between these federal programs would maintain the program's focus on areas with above average numbers of low-income children while opening new access points for underserved families. Figure 1 shows the new areas in Kentucky that would be available to operate open sites in 2019 with this improvement.



Figure 1: Aligned Federal Summer Program Area Eligibility Improvements in Kentucky<sup>xv</sup>

# Allow Alternate Program Models in Underserved and Hard-to-Reach Areas

A second recommendation to reduce the summer meal gap is to permit community organizations, such as God's Pantry Food Bank, to operate alternative program models to reach kids where they do not otherwise have access to a meal site. No two communities are the same, and therefore our partner organizations need a variety of tools and program models to effectively reach those in need. This includes proven strategies such as providing flexibility from the requirement that kids consume meals on-site, allowing communities to deliver or send meals home with children, and giving families a summer grocery card to supplement their household food budget. Where the current site-based model is available, it is great for children. These additional federal program models should complement the site-based model to effectively fill the gaps to ensure low-income children have access to the nutrition they need throughout the year. Allowing complementary program models and strong national standards will ensure that whether children live in Kentucky or Indiana, Maine or Mississippi, they will have nutrition programs available throughout the year.



#### **Relax the Congregate Feeding Requirement**

Clearly childhood hunger is an issue of crucial importance. Let's acknowledge that it is never the fault of a child if they are hungry. Private sector, government, non-profit, faith-based, corporate and educational institutions must work together to deliver food and hope to our vulnerable children.

To do just this, Kentucky Department of Agriculture Commissioner Ryan Quarles started the Kentucky Hunger Initiative, an effort which brings together farmers and community leaders to work collectively to alleviate hunger throughout the Commonwealth. They found that USDA-reimbursed afterschool meal programs and summer feeding programs in Kentucky were limited in their reach because of federal rules mandating that meals must be served in a group setting, under the supervision of the feeding site sponsor<sup>xvi</sup>, rather than permitting children to take meals into their home. God's Pantry Food Bank and others who work on the front lines of child hunger-relief could serve more nutritious meals, and reach more hungry children, if the program were allowed flexibility from the so-called "congregate feeding" rule in rural and other underserved or hard to reach communities where the site-based model has proven challenging or unsustainable.

The logistical challenges of delivering nutritious meals to children in the summer, when school is out of session, are significant. Modifying the congregate feeding rule would allow rural states like Kentucky the flexibility we need to serve nutritious summer meals to hungry children who live in hard-to-reach areas. Modifying the rule would also enable feeding site sponsors to allow children living in violence-prone neighborhoods to consume their summer meals in the safety of their own homes rather than requiring them to eat meals in open areas where they could be exposed to harm.

According to Commissioner Quarles, "Similarly, after-school meal programs could achieve a greater impact if school food service directors and other site sponsors had the option to distribute nutritious 'meals to go' on their way out the door at the day's end. Allowing the child to consume his or her meal later in the day, at home, could enable the child to bridge the nutritional gap between the end of the school day and breakfast the next morning."

To better understand just how underserved these children are, recall from earlier in this testimony that 17,219 low-income children benefited from afterschool suppers on an average weekday in Kentucky during October of the 2017-2018 school year, a robust 16% increase from the previous year. That sounds great, doesn't it? But the fact is that only 1 in 25 Kentucky kids that have access to a free lunch at school have access to a free afterschool meal through CACFP at-risk programming. In other words, for those 17,000 kids who were served, another 420,000 to 425,000 Kentucky children did NOT have access to or seek to receive a subsidized evening meal.<sup>xvii</sup> How many of these are children who may not eat until returning to school the next day?

As you know, congregate feeding sites are just that. Feeding *sites*. They require meals to be consumed at a specific, approved location. This works very well for *some* locations: summer school, YMCA's, Boys and Girls Centers, child care centers, summer camp programs, or similar site-based options. There is no denying that congregate feeding sites, when they are accessible for a child and family, provide educational, social and interpersonal skill development opportunities. But in our rural Kentucky counties, hungry children may live 20 miles from a feeding site. It's simply not practical and in most cases not cost effective for the child to get to a summer feeding location. In Kentucky, only 1 in 12 children who participate in the school lunch program receive a summer meal.<sup>xviii</sup>



Let that sink in. 1 in 12. That's roughly 92% of those children who receive a free or reduced-price meal during the school year who are NOT able to access a summer meal. We need to provide Kentucky, and all 50 states, more feeding options in rural or high-poverty communities where children do not have access to congregate sites.

This is where mobile feeding initiatives help. In one of our counties, the public library serves as a summer site. After those children have eaten, the library packs meals into a book mobile and drives to a low-income housing area. Another requirement is that meals are to be consumed on premise in the presence of supervising staff. This sounds great in principle. But at this particular location, there are no picnic tables or park benches. So on a hot, summer day, or heaven forbid a day with thunderstorms, the children must stand or sit on the ground in the vicinity of the mobile unit to consume the meal. The librarian knows of a child with a physical disability who lives in the apartment building. Unfortunately, that child is not eligible for a SFSP meal because he cannot leave his apartment to congregate as part of the official site to consume the meal. The librarian instead has to pack a separate, *non-reimbursed meal*, for the child and has the child's sibling take that separate meal to him!

If regulations were modified, the child would receive a SFSP meal and the other children could return to their apartments, or even sit in the shade on their own porch. This would also offer the library book mobile the opportunity to be more efficient and travel to other locations to deliver additional meals.

Within Kentucky, 75 sponsors provided meals at 679 mobile sites. Mobile meal sites have grown from around 100 in 2015 to almost 700 in the past 3 years.<sup>xix</sup> Mobile feeding initiatives are an innovative solution, particularly for children and families with transportation barriers.

This metric speaks to the rural nature of Kentucky -- access to summer meals is difficult even with innovations in transportation. While access to meals is increasing because of mobile meals, sponsors are still struggling to reach all kids because of the geographic isolation many rural families live in.

We were thankful when Congress appropriated funding to the U.S. Department of Agriculture (USDA) in 2009 to test innovative program models for reaching kids during the summer months. Several of the demonstrations tested programs that have shown to be effective through smaller, privately-funded efforts, such as providing kids with backpacks to serve them during the days when they are not able to reach a site. Other program models delivered meals to kids in rural areas where there were no sites that a child could travel to. In these models, implemented in Massachusetts, New York, and Delaware, children received meals close to their homes. By relaxing the congregate requirement in hard to reach areas – such as rural communities, where there are no sites available, or where weather or safety challenges impact participation – providers like the God's Pantry Food Bank can utilize all of our innovative resources to reach those in need.

Modifying feeding requirements would allow more children to be served each day. Local municipalities know what can and cannot work in their own communities. A "one size fits all" approach is not functioning in our rural and underserved communities. It's time to update the way we feed kids in the summertime. States and communities need flexibility to meet rural, suburban and urban children's needs. We need to use the most efficient and effective policies and reach hungry kids, no matter where they live.



## Utilize Efficiency of a Summer Grocery Card

At God's Pantry Food Bank we are excited by another program model that was tested by the USDA to reach hungry kids in the summer: a family grocery card. Since beginning in the summer of 2011, eight states and two Indian Tribal Organizations have participated in Summer EBT Demonstration projects to provide families with a grocery card pre-loaded with \$60 per month per child certified for free or reduced-price school meals.<sup>xx</sup> This creative solution helps to offset an estimated incremental \$300 low-income households spend a month on groceries during the summer<sup>xxi</sup>, helping to partially relieve additional economic pressures on their already limited finances and assisting with the trade-offs between food, rent, medical bills and utilities these household face.

States administered the program through the EBT systems in either the Supplemental Nutrition Assistance Program (SNAP) or the Women, Infants, and Children (WIC) program. The demonstration projects were extensively evaluated and in both rural and urban counties. The results were significant. In households that received funds to purchase groceries during the summer, very low child food security decreased by 33 percent. When compared to non-participants, kids also improved their nutrition outcomes. They consumed more fruits and vegetables, more whole grains, more dairy, and fewer sugar-sweetened beverages. What's more, more than 80 percent of families in the typical demonstration area used the benefit, which is significantly larger than fewer than 20 percent of children who are able to access the current congregate summer meal program.<sup>xxii</sup>

While we believe in the importance of private-public partnerships to provide programming and meals to kids in need throughout the year, we know recreating the infrastructure that exists during the school year is not feasible in all communities and therefore would like to see the grocery card program expanded and implemented in communities that have high need and are particularly difficult to reach.

# **Summary of Recommendations**

## Strengthen the Site-Based Model

- Allow community providers to operate one program year-round through SFSP
- Align the area eligibility threshold with other federally funded summer programs

## Allow Alternate Program Models in Underserved and Hard-to-Reach Areas

- Relax the Congregate Feeding Requirement
- Utilize Efficiency of a Summer Grocery Card

Making real progress toward ending child food insecurity and ensuring opportunity for all of our nation's children will require investing new resources toward increasing access, particularly during times when children are out of school like summer. Simply making small incremental change is not enough. After 50 years the time has come for break-through, "step function", innovation. An investment in funding through Child Nutrition Reauthorization with seamless year-around afterschool and summer programming is an investment in our children's health and education. An investment that will ensure a productive competitive future workforce that will pay dividends in years to come. I encourage The Committee on Agriculture, Nutrition, and Forestry to advance recommendations to strengthen child nutrition programs in reauthorization helping to end hunger in this country.



I'll close with a final thought also etched forever in my mind. I had just finished a press conference in Lewiston, ID to open an afterschool Kids Cafe program at a local Boy's and Girl's Club. A student, who I'll simply call "K", approached and handed me a small framed drawing of a slice of buttered toast. I smiled, saying "thank you." The reply was, "No, thank you. Because of the food you help me get I'm not as hungry and I do better in school." Leave it to the mind of a child to help one clearly see the need.

It has been my honor to have testified today on behalf of "K". Thank you.

All the very best,

Michael J. Halligan Chief Executive Officer God's Pantry Food Bank, Inc.

<sup>&</sup>lt;sup>i</sup> Gundersen, C., A. Dewey, A. Crumbaugh, M. Kato & E. Engelhard. *Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016.* Feeding America, 2018. <u>http://map.feedingamerica.org/</u>

<sup>&</sup>lt;sup>ii</sup> Gundersen, C., A. Dewey, A. Crumbaugh, M. Kato & E. Engelhard. *Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016.* Feeding America, 2018. <u>http://map.feedingamerica.org/</u>

<sup>&</sup>lt;sup>III</sup> US Census, Small Area Income and Poverty Estimates, State and County Estimates for 2017.

https://www.census.gov/data/datasets/2017/demo/saipe/2017-state-and-county.html

<sup>&</sup>lt;sup>iv</sup> Feeding America, *Hunger in America 2014*, National Report. August 2014.

https://www.feedingamerica.org/research/hunger-in-america

<sup>&</sup>lt;sup>v</sup> Gundersen, C., A. Dewey, A. Crumbaugh, M. Kato & E. Engelhard. *Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016.* Feeding America, 2018. <u>http://map.feedingamerica.org/; for national data</u>, Alisha Coleman-Jensen, Matthew P. Rabbitt, Christian A. Gregory, and Anita Singh. 2018. *Household Food Security in the United States in 2017*, ERR-256, U.S. Department of Agriculture, Economic Research Service

<sup>&</sup>lt;sup>vi</sup> Gundersen, C., A. Dewey, A. Crumbaugh, M. Kato & E. Engelhard. *Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016.* Feeding America, 2018. <u>http://map.feedingamerica.org/</u>

<sup>&</sup>lt;sup>vii</sup> Gundersen, C., A. Dewey, A. Crumbaugh, M. Kato & E. Engelhard. *Map the Meal Gap 2018: A Report on County and Congressional District Food Insecurity and County Food Cost in the United States in 2016.* Feeding America, 2018. <u>http://map.feedingamerica.org/</u>

<sup>&</sup>lt;sup>viii</sup> Kentucky Association of Food Banks, *Hunger in Kentucky 2014*, Kentucky Report. August 2014. <u>https://feedingky.org/wp-content/uploads/2019/04/Hunger-in-Kentucky-2014.pdf</u>

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<sup>ix</sup> Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <u>http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf</u>.

<sup>\*</sup> Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <u>http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf</u>.

<sup>xi</sup> Summer Food Service Program 2018. Raw data. Kentucky Department of Education, December 2018. Kentucky, Frankfort.

<sup>xii</sup> Summer Food Service Program Data, U.S. Department of Agriculture, Food and Nutrition Service. <u>https://www.fns.usda.gov/sites/default/files//04sffypart.pdf</u>

xiii Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <u>http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf</u>.

<sup>xiv</sup> Summer Food Service Program 2018. Raw data. Kentucky Department of Education, December 2018. Kentucky, Frankfort.

<sup>xv</sup> Map provided by Food Research and Action Center, April 2019.

<sup>xvi</sup> 7 C.F.R. 225.6(e)(15) (requiring summer meals feeding site sponsors to agree in writing that they will "[m]aintain children on site while meals are consumed"); *see also* USDA Memo CACFP 10-2017 (April 6, 2017) (mandating that CACFP "meals must be consumed on-site in order for the meal to be reimbursable")

<sup>xvii</sup> Afterschool Suppers: A Snapshot of Participation 2018, Afterschool Nutrition Report. Food Research and Action Center, October 2018. <u>http://www.frac.org/wp-content/uploads/afterschool-report-october-2018.pdf</u>.

<sup>xviii</sup> Hunger Doesn't Take a Vacation: Summer Nutrition Status Report. Food Research and Action Center, June 2018. <u>http://frac.org/wp-content/uploads/frac-summer-breakfast-report-2018.pdf</u>

<sup>xix</sup> Summer Food Service Program 2018. Raw data. Kentucky Department of Education, December 2018. Kentucky, Frankfort.

<sup>xx</sup> Participants in the Summer EBT Demonstration Projects include: Connecticut, Delaware, Michigan, Missouri, Nevada, Oregon, Texas, Washington, Cherokee Nation, Chickasaw Nation

<sup>xxi</sup> Deloitte Consulting: *Summer Nutrition Program Social Impact Analysis: Summer Hunger is Too Expensive to Ignore.* Share Our Strength, No Kid Hungry June, 2015.

https://www.nokidhungry.org/sites/default/files/NKH\_MicroReport\_SummerHunger.pdf

<sup>xxii</sup> U.S. Department of Agriculture, Food and Nutrition Service. Summer Electronic Benefit Transfer for Children (SEBTC) Demonstration: Summary Report, May 2016.

https://www.fns.usda.gov/sites/default/files/ops/sebtcfinalreport.pdf