REPORT

Evaluation of the 2012 North Carolina Super Summer Meals Pilot

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July 2013

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Findings at a Glance

The 2012 North Carolina Super Summer Meals Pilot program sought to increase the percentage of eligible children receiving federally funded summer meals by 10 percent in eleven pilot public school districts (known as local education agencies, or LEAs) and by 2 percent for all LEAs statewide. We found the following results for summer 2012:

- The program exceeded its goals, showing dramatic increases in meal sites established and meals served.
- Pilot LEAs established seventy-five new meal sites.
- Owing in part to the additional sites, the number of total lunches served grew by 159 percent in the pilot LEAs.
- Statewide, the number of summer lunches served in all LEAs grew by nearly 18 percent.
- Pilot LEAs drew down almost \$592,000 in federal funding reimbursements for summer meals (including breakfast, lunch, and snacks).
- Most pilot LEAs viewed the program positively and will participate again in 2013.
- Despite efforts to reduce paperwork in pilot LEAs, the high administrative burden on local sponsors appears to be the most significant barrier to program success.





EXECUTIVE SUMMARY

Evaluation of the 2012 North Carolina Super Summer Meals Pilot

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In North Carolina, one in four children is considered at risk of hunger or food insecurity. The North Carolina Super Summer Meals Pilot partnership was launched in 2012 to address the crisis of childhood hunger in the state. The partnership's specific goal was to increase participation in federally funded lunchtime feeding (meals served) by 2 percent statewide and to increase the number of sites and meals served by 10 percent in eleven targeted pilot local education agencies (LEAs) in North Carolina.¹ This collaborative effort was led by the state's Department of Health and Human Services and Department of Public Instruction, in partnership with No Kid Hungry NC, a project of the national nonprofit organization Share Our Strength.² The University of North Carolina at Chapel Hill School of Government evaluated this effort by collecting pre- and post-program data and conducting in-depth interviews with all pilot LEA sponsors,³ a sample of individual meal site supervisors, and sponsors who had participated in summer meal programs in a prior year but did not participate in 2012.

The results of the 2012 program are impressive. From 2011 to 2012, the number of summer lunchtime meals served increased by 159 percent in the pilot LEAs (109,169 additional lunches served). The number of meal sites in those LEAs grew by nearly 67 percent (seventy-five new sites). Moreover, the eleven pilot LEAs drew down almost \$592,000 in federal funds for the meals program in 2012.⁴ Statewide—including non-pilot participants—the number of summer lunchtime meals served grew by nearly 18 percent (345,749 additional meals).

These remarkable results can be attributed to a number of outreach efforts aimed at (1) reducing the administrative burden, (2) increasing recruitment of sponsors and meal sites, (3) securing new mini-grant funds, and (4) increasing public communication. Despite these gains, however, the effort to achieve them was intense, and there is clear room for further program improvement, especially in reducing the administrative burden for local school nutrition directors and community partners.

^{1.} LEAs are public school districts. The following LEAs were pilots in the summer meals program: Asheville City, Bertie County, Buncombe County, Cumberland County, Edgecombe County, Hoke County, Johnston County, Montgomery County, Roanoke Rapids City, Stanly County, and Warren County schools.

^{2.} Additionally, program partners provided small grants to support the Kicking4Hunger enrichment program, two food banks, and North Carolina's largest LEA (Charlotte-Mecklenburg Schools).

^{3.} Sponsors are the lead organizations that take responsibility for managing free summer feeding programs for children in need in their area.

^{4.} The dollar amount includes reimbursements for all meals—breakfast, lunch, and snacks—served under the pilot program in 2012.

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List of Abbreviations and Acronyms

CFR Code of Federal Regulations DHHS North Carolina Department of Health and Human Services DPI North Carolina Department of Public Instruction FRAC Food Research and Action Center LEA Local Education Agency NC North Carolina NSLP National School Lunch Program PL Public Law SBP School Breakfast Program SFSP Summer Food Service Program SOG University of North Carolina School of Government SSMP Super Summer Meals Pilot SSO Seamless Summer Option USDA United States Department of Agriculture WIC Women, Infants, and Children

Introduction and Background

No Kid Hungry NC Outreach Campaign

One in four children in North Carolina is now considered at risk of hunger or food insecurity, defined by the U.S. Department of Agriculture (USDA) as a lack of access to enough food for an active, healthy life and limited or uncertain availability of nutritionally adequate foods. Two years ago, Governor Bev Perdue announced her intention to bring the No Kid Hungry campaign, a rapidly growing initiative of the thirty-year-old national anti–childhood hunger nonprofit Share Our Strength, to North Carolina. Governor Perdue officially launched the state's program, No Kid Hungry NC, in September of 2011.

No Kid Hungry NC is a private–public partnership focused on expanding school breakfast and summer meal program participation. The organization's role is to identify needs and barriers, locate resources to address those needs, and serve as a catalyst for local action. No Kid Hungry NC fulfills its role by forming key partnerships with other state and community leaders focused on children's nutrition. Its first goal was to increase the program participation rate of children eligible for free and reduced-price breakfast. No Kid Hungry NC awarded at least fifty-two minigrants to North Carolina schools for breakfast program outreach efforts, and its staff provided support services to selected schools. The second phase of No Kid Hungry NC's work, which is the subject of this evaluation, focused on increasing participation in summer meals programs. In the summer of 2011, only 12 percent (91,115) of eligible North Carolina students received meals through earmarked federal funds, leaving almost 680,000 eligible children without available program benefits.

No Kid Hungry NC's Efforts to Increase Participation in Summer Meals Programs

No Kid Hungry NC worked closely with the North Carolina Department of Public Instruction (DPI), the leaders of DPI's Seamless Summer Option (SSO), and the North Carolina Department of Health and Human Services (DHHS) Division of Public Health, which oversees the Summer Food Service Program (SFSP), on how to remove obstacles to feeding more children when school is out for the summer months.

The SSO is made available through the U.S. Department of Agriculture (USDA) School Breakfast Program and National School Lunch Program and allows schools to operate under the same meal service rules and reimbursement procedures used during the regular school year. The SSO is administered by school nutrition directors in North Carolina local education agencies (LEAs) and was offered in fifty-one LEAs in 2012. In past years, when summer school was more common, the SSO was the primary way children received federally supported meals in the summer. In recent years, however, most LEAs have not offered summer school. An alternative to the SSO, the Summer Food Service Program, allows DHHS to work directly with community groups that provide summer meals for children—for example, local Boys and Girls Clubs that prepare meals for children attending their summer programs or community groups that take meals to children in rural areas. There are many similarities between the SSO and the SFSP, including oversight, types of sites and eligibility, and numbers and types of meals served, but there are also significant differences between the two programs. These differences include reimbursement rates, application processes, food service operations, meal patterns, public notice, recordkeeping and documentation, training requirements, and monitoring. While the programs serve the same clients (children eligible for free and reduced-price school meals during the school year) and provide the same service, they are parallel programs administered by different state agencies.

Participation in both the SSO and the SFSP is low. According to state officials and community partners familiar with the two programs, the primary obstacles to participation are inadequate funding for program implementation, inability to transport meals and/or children to feeding sites, and the overall burden of administering the programs.

For the summer of 2012, No Kid Hungry NC, DHHS, and DPI partnered in an effort to significantly increase participation in both summer meals programs. Specifically, this team launched a collaborative initiative called the Super Summer Meals Pilot (SSMP), with the goal of increasing participation in summer lunchtime feeding by 2 percent statewide and by 10 percent in eleven targeted pilot LEAs. To that end, SSMP partners coordinated a sophisticated outreach initiative, including attempts to reduce barriers to participation for school nutrition directors and other potential sponsors by appealing to the USDA to waive some of its administrative and monitoring regulations. Schools in good standing with the National School Lunch Program, for example, were granted a more streamlined application, monitoring, and documentation process. Other elements of the outreach effort are explored in the following sections.

While the SSMP was officially a part of the overarching, established SFSP, in practical, informal terms, the pilot worked as an integrated program. The state-level administrative work was conducted by DHHS, which oversees the SFSP program, but the local implementation responsibilities lay with school nutrition directors, who normally work with the SSO program. Local meal site administration included both school and community-group staff, who would normally work with the SSO and SFSP programs, respectively. Rather than work in parallel but separate programs, partners secured a waiver from the USDA that allowed for an experiment—taking what were seen as the best aspects of both programs and working collaboratively across department lines.

Evaluation Request

In the spring of 2012, representatives from No Kid Hungry NC approached the University of North Carolina at Chapel Hill's School of Government (SOG) about evaluating the partnership's efforts. This report provides findings and recommendations from the SOG's evaluation of the strategies and tactics used to increase participation in the summer meals program. The SOG team was specifically tasked with assessing SSMP outreach work, including efforts to (1) reduce the administrative burden on current and potential sponsors, (2) recruit new sponsors and sites, (3) provide funding to pilot sponsors and other partners, (4) increase public communications about the program, and (5) provide new texting features and online meal site locators to increase participation.

The SSMP partnership developed these outreach efforts to achieve their program goals. Efforts to reduce the administrative burden produced the USDA waiver. Sponsor and site recruitment included dedicating two full-time staff to help sign up new partners. No Kid Hungry NC provided mini-grant funding for sponsors to help defray the costs of program start-up. Increased public communications support helped promote the program through printed fliers and earned media opportunities. At the national level, the No Kid Hungry Campaign developed new texting and

online meal site locators to help potential participants find the most convenient sites to get free meals.

This report contains the School of Government's evaluation of the SSMP outreach efforts. The SOG team conducted in-depth, sixty- to ninety-minute, semi-structured post-program interviews with each of the eleven pilot LEA sponsors and with each mini-grant recipient (the aforementioned pilots, two regional food banks,⁵ Charlotte-Mecklenburg Schools, and the nonprofit Kick-ing4Hunger). The team then held semi-structured interviews with thirteen site supervisors from the pilot LEAs, DHHS consultants and staff, local and national SOS staff, and others directly involved with this effort. We also conducted follow-up interviews with sixteen former SFSP sponsors who declined to participate in the SFSP in 2012 to explore the reasons for their refusals. In total, we spoke with fifty-one individuals associated in various ways with the summer meal programs.

This report first provides overall data on program participation, including meals served and sites established. It then discusses the results of our interviews along the lines of the five outreach efforts listed above.

^{5.} These included the Food Bank of Central and Eastern North Carolina and the Manna Food Bank, which serves western North Carolina.

PART I: Super Summer Meals Pilot Campaign Goals

During the spring of 2012, the Super Summer Meals Pilot partners set a goal of increasing participation in summer lunchtime feeding (meals served) by 2 percent statewide and increasing the number of sites and meals served in the pilot sponsor LEAs by 10 percent. According to data provided for this evaluation by DPI and DHHS, all indications point to substantial successes in meeting these campaign goals.

FINDING 1: Statewide Participation Goal Was Substantially Exceeded

The results show an 18 percent statewide increase in the number of lunchtime meals served in both the Seamless Summer Option and the Summer Food Service Program in 2012 (see Figure 1). However, this number requires further examination. The number of students fed through the SFSP program overall (including both the SFSP/SSMP pilot and the regular SFSP) increased 27 percent statewide, while the number of SSO meals decreased 7 percent. The decrease may be due in part to six sponsors having switched from SSO to SFSP under the 2012 SSMP initiative.

The SFSP and SSO programs also provided more than 1,579,207 snacks statewide during the summer of 2012, bringing the total meals served to 3,863,129, or 20 percent more meals than were served in 2011. Figure 2 shows the total meals served (combining lunches and snacks) through the SFSP (SFSP/SSMP pilot and regular SFSP) and SSO programs.

Figure 1. The number of lunchtime meals served increased by 18 percent in the summer of 2012 compared to the summer of 2011



Figure 2. Total meals served in North Carolina through all established and pilot summer lunch and snack programs in 2011 and 2012

FINDING 2: Program Exceeded Goals to Increase Meal Sites and Lunches Served in Pilot LEAs

The increase in statewide participation in 2012 may be explained in part through an analysis of the SSMP's second goal, an increase in the number of meal sites under each sponsor. In the eleven SSMP pilot LEAs, the number of sites increased by nearly 67 percent (see Figure 3). This substantial increase in authorized sites may be due in part to the fact that several LEAs that did not run any summer feeding programs in 2011 joined the program and ran multiple sites in 2012 (including Buncombe County, with thirty-five sites, and Hoke County, with ten sites). In addition, several continuing sponsors added sites (including Montgomery County, with an increase from three to six sites; Edgecombe County, with an increase from sixteen to twenty-seven sites; and Stanly County, with an increase from nine to twenty-three sites).

Additionally, the number of lunches served in the SSMP pilot LEAs alone increased by 159 percent, from 68,873 lunches served in 2011 to 178,042 in 2012. This substantially exceeds the SSMP goal of increasing the number of lunches served in the pilot LEAs by 10 percent. As Part IV below explains, much of this success can be attributed to a dedicated recruitment strategy to establish additional meal sites in pilot LEAs. Figure 4 shows the increase in lunches served in the pilot LEAs under the SSMP.

Figure 3. The number of sites increased 67 percent, from 112 sites in the 11 targeted LEAs in 2011 to 187 sites in 2012 Figure 4. The 187 sites established in the eleven pilot LEAs in 2012 helped increase the number of lunches served by 159 percent



FINDING 3: Federal Funding Reimbursements Drawn Down by Pilot LEAs Increased 140 Percent

The SFSP provides a reimbursement rate of \$3.38 per meal for self-prepared meals, which is \$0.52 higher than the SS0 program's reimbursement rate of \$2.86 per meal. The SSMP waiver attempted to reduce the administrative burden in implementing the program while securing the maximum reimbursement levels. In 2012, this translated into a substantial increase in reimbursements for LEAs participating as SSMP pilots. About \$592,000 in federal funding reimbursements was drawn down by SSMP participants in 2012, representing a 140 percent increase in reimbursements from about \$247,000 drawn down in 2011 (see Figure 5).

Figure 5. LEAs participating in the SSMP program increased their total reimbursements by 140 percent from 2011 to 2012



Among the six pilot LEAs that moved from the SSO to the SFSP feeding program, total reimbursements increased 69 percent, from over \$179,000 in 2011 under SSO to almost \$304.000 in 2012 under SFSP. These LEAs increased their individual reimbursement levels by an average of \$21,000 under the SFSP program. For example, Asheville City Schools and Bertie County Schools saw substantial increases, with 523 percent and 430 percent higher reimbursements, respectively. The two LEAs that were in the SFSP program in 2011 saw an increase of almost 51 percent in 2012. The remaining three LEAs that did not participate in any feeding program in 2011 (Buncombe, Hoke, and Warren counties) went from no reimbursements in 2011 to an average increase of over \$61,000 per LEA (\$184,000 total). Figure 6 shows the reimbursement increases for former SSO members, former SFSP members, and LEAs that did not operate a summer feeding program in 2011.

FINDING 4: Almost All Sponsors Will Repeat in 2013

One of the most important variables addressed by this evaluation is whether the pilot is sustainable, as demonstrated by whether sponsors are willing to repeat their participation in the program in 2013. In fall 2012 interviews with every pilot sponsor, more than half of the respondents indicated a willingness to repeat the program in the future, while two declined, and three were unsure. However, at the time of printing, all of the SSMP pilot sponsors had submitted letters of intent to participate in 2013.

When asked why they would or would not participate in the program in 2013, the sponsors mentioned several of the factors evaluated in Part II, below. Among the most common factors cited, the amount of paperwork elicited the strongest negative reactions, while the value of the

"For me, it was worth it for the reimbursements and we'll do it again. The higher reimbursement rate and the administrative money allowed us to break even." reimbursement elicited the strongest positive reactions. The six respondents willing to repeat the program in 2013 cited the value of the reimbursement and the critical need to feed hungry children in the community. As one sponsor stated, "For me, it was worth it for the reimbursements and we'll do it again. The higher reimbursement rate and the administrative money allowed us to break even." Other sponsors agreed with this sentiment, including one who stated, "I'd love to be able to do it again because of the need in the community." The majority of the participants in the SSMP program in 2012 felt that the benefits of the program far outweighed the potential barriers.



Figure 6. Reimbursement increases under the SSMP for (1) previous SSO members, (2) previous SFSP members, and (3) new participants

Sponsors who were resistant to or uncertain about repeating the program in 2012 most commonly cited the administrative burden of the SSMP program. One particularly resistant sponsor stated, "It was nothing but a freaking nightmare. The program benefits do not outweigh costs and paperwork. I never want to do it again." Another sponsor who is unsure about repeating the program next year stated, "There was overwhelming paperwork. It sounded great because I want to feed more kids, but it was a disaster." These concerns are noteworthy given that one of the main goals of the SSMP program was to reduce the amount of paperwork through the USDA waiver.

"There was overwhelming paperwork. It sounded great because I want to feed more kids, but it was a disaster."

FINDING 5: Most Meal Sites Will Open Again in 2013

Another important indicator of the SSMP's success was the willingness of site directors, who set up and monitor each meal site, to enroll in the summer feeding program again in 2013. As part of this evaluation, we identified a sample of thirteen site directors from the pilot LEAs to assess their interest in participating in 2013. As was the case with the sponsors (see Finding 4), more than half of the respondents expressed a willingness to repeat the program, while the rest were either unsure or not interested (see Figure 7).

Figure 7. More than half of the site directors interviewed were willing to re-enroll in the program in 2013, while the remaining respondents were either unwilling or unsure about participation



"I would give the program a 10 out of 10! It was a great program to help kids through the summer that got them food when they were hungry."

"Many kids are in extreme poverty and the [No Kid Hungry NC] meal is the only one they get all day."

Most site directors were generally positive about the program and were interested in repeating their participation in 2013. One respondent stated, "I would give the program a 10 out of 10! It was a great program to help kids through the summer that got them food when they were hungry." Another said, "The program went extremely well. Lots of hungry kids, most from the district were getting fed. Many kids are in extreme poverty and the [No Kid Hungry NC] meal is the only one they get all day." These comments reflect the views of many participants regarding the value of the program and its ability to address critical hunger issues in local communities.

Like the pilot sponsors, however, several site directors expressed negative feedback, including outstanding concerns about preparation and timing, administrative burdens, and low turnout. One respondent unsure about repeating in 2013 stated, "I'm not sure we will do it again this year given the turnout. Although it didn't work, we now have a better understanding of the needs in the community." Another comment from a site director is representative of the frustration felt by many site directors and sponsors regarding the administrative burden and the timing of the program rollout: "Paperwork for the SFSP was completed too late. We needed to get it done so that we could alert parents before the schools were closed, but we didn't get the word out to the parents in time." The following section addresses the issues related to administrative burden.

FINDING 6: Administrative Burden Was a Program Participation Barrier Prior to 2012

As part of our preparation for the evaluation of the 2012 program, we attempted to better understand why some 2011 sponsors did not sign up for the program again in 2012. We contacted thirty-one former sponsors for semi-structured interviews, sixteen of whom participated in interviews for this report. The most consistently mentioned reasons for not repeating the program were (1) administrative paperwork, (2) approval hurdles, and (3) inadequate reimbursement. Under the SFSP, sponsors must be approved by the state according to federal regulations before they can receive reimbursements for meals served. The amount of paperwork required for the approval process was the most noted burden of SFSP sponsorship. Respondents said that the required paperwork was tedious, redundant, and too much to handle. Some gave up on the approval process after having dedicated significant time to completing the paperwork only to have it returned multiple times for corrections. Many chose not to participate because they did not have the capacity in their organizations to handle the SFSP paperwork on top of their regular workloads. While the paperwork was consistently unpopular, some respondents understood the need to have such a process in place.

According to local program administrators in non-returning programs, required approvals from local public health departments and agencies also presented a hurdle, and communication problems between local and state officials compounded the issue. Respondents said that they were confused and that rules did not seem to be consistently enforced.

Respondents also listed the federal reimbursement level as a deterrent to SFSP sponsorship. According to these non-returning sponsors, higher food prices meant that the established reimbursement did not allow them to provide meals that children would actually eat. Several sponsors attempted to partner with chain restaurants but were unsuccessful because the restaurants could not afford the extra cost. In addition, sponsors noted that reimbursements were not always received in a timely manner. All of these issues resulted in some programs or program coordinators having to pay for meals and other expenses out of pocket. Multiple respondents said that they did not fully understand the financial aspects of the SFSP.

PART II: Reducing the Administrative Burden

There is much agreement among practitioners and scholars about the administrative challenges facing many potential sponsors when enrolling in the Summer Food Service Program.⁶ According to experts, the administrative requirements to enroll and receive reimbursements for program costs intimidate many potential sponsors.⁷ Given these challenges, one important program goal of the Super Summer Meals Pilot initiative was to reduce administrative hurdles for the 2012 pilot LEAs. The School of Government evaluation team was asked to assess the SSMP efforts to reduce administrative burdens for new and repeating sponsors.

The SSMP partnership endeavored to address this problem by applying to the USDA for a waiver of part of the SFSP's administrative and monitoring regulations in the eleven pilot LEAs across ten North Carolina counties (covering more than 155,000 eligible children). Specifically, the SSMP partnership sought a waiver allowing for less paperwork while maintaining the higher meal reimbursement rates in these LEAs. The SFSP, for example, provides a \$0.52 higher reimbursement for self-prepared meals (\$3.38 per meal) than traditional summer feeding programs under the Super Summer Option (\$2.86 per meal). However, the higher reimbursement from the SFSP is offset by a more difficult administrative process than the process for the SSO—including substantially more paperwork, monitoring, site visits, and other requirements. Nevertheless, the higher reimbursements have become more attractive to schools facing budget shortfalls.

In March 2012, the USDA agreed to grant a waiver of some of the administrative and monitoring regulations, making it easier for the eleven pilot LEAs to participate in the SFSP. Schools in good standing with the National School Lunch Program were able to complete a more streamlined application process that required less monitoring, fewer site visits, and less documentation of financial and administrative capacity and eliminated the requirement for schools previously approved under the national program to apply as new sponsors or sites under the SFSP. In short, the waiver allowed for the maximum reimbursement available under the SFSP with far less paperwork.

FINDING 7: Sponsors Felt Administrative Burden Remained Overwhelming in 2012

Sponsors did not feel that the changes listed above resulted in substantive reduction of the administrative burden of providing summer meals to children. Every sponsor expressed a high level of frustration with the continuing administrative burden. Sponsors felt that the waiver did not meet their expectations in reducing the administrative hurdles, with the primary complaint being the paperwork burden over the course of the summer. The concerns were shared by new

^{6.} Food Research and Action Center, "Hunger Doesn't Take a Vacation: Summer Nutrition Status Report 2011," June 2011, http://frac.org/pdf/summer_report_2011.pdf.

^{7.} Food Research and Action Center, "Hunger Doesn't Take a Vacation: Summer Nutrition Status Report 2011," p. 4.

SFSP participants as well as sponsors familiar with the previous administrative requirements through prior participation in the SSO or the traditional SFSP program.

Sponsor responses varied from a focus on the relatively high level of required administrative tasks to feelings of being misled. One sponsor noted, "It was kind of unreal. The paperwork was so bad I had to hire someone full-time just to keep up with [it]. Even after [the] waiver, it was still a problem." Another stated, "We are already overwhelmed with the current budget issues and the ongoing battle just to keep afloat."

"Honestly? There was still a lot of paperwork. The waiver only eliminated the pre-op visit and I didn't have to redo the application. But we still had to do a lot of paperwork." Yet another sponsor said, "What bothers me most is that I made it clear at the beginning I didn't want to take on more paperwork, I didn't want to recruit sites, I didn't have the capacity to do it. . . . We are already overwhelmed with the current budget issues and the ongoing battle just to keep afloat." Sponsors' expectations about the potential reduction in paperwork were not realized. While the USDA waiver did streamline the process, from the sponsors' perspective, the process was still overwhelming.

FINDING 8: Sponsors and Site Directors Received Program Materials Too Late

There was universal agreement among sponsors that the limited time frame available to set up the program was problematic. Specifically, the sponsors agreed that they were approached too late and promotional materials for the program arrived too close to the summer break. According to the sponsors, fliers and other materials were unavailable until the last week of school, when most teachers were ill prepared to distribute them to students. One sponsor stated, "The program got started too late—we were contacted May 31 but school is out in the beginning of June." Another said, "Materials . . . came very late; one week before school was out. And we couldn't get them out to students because [they were] too late getting to us. It was a great idea, but by the time we got them students were out the door."

These problems with timing, however, are mostly due to the experimental nature of the SSMP process. The SSMP partnership first met jointly in the governor's office in November 2011, at which time the waiver concept was developed and shared with USDA regional officers. The team submitted a formal request for the waiver in December 2011, and after the USDA first rejected the request in January 2012 because additional information was needed, the revised proposal was approved in March 2012. Although a number of potential sponsors were invited to participate late in the spring, many of them declined out of fear of impending budget cuts and changes from new USDA regulations. At that point, different candidates were targeted, and after dedicated recruiting and persuasion by the SSMP partnership, several new sponsors agreed to participate. This resulted in a compressed time frame for sponsors to sign up. The sponsors' applications were approved and sites were established in the last week of May. Many outreach materials needed to be hand delivered before the last week of school in early June.

FINDING 9: Reimbursement System Was Unclear

Many sponsors identified another problem: the difficulties and uncertainty of the reimbursement process. All of the summer meal programs (SSO, SFSP, and SSMP) require sponsors to order or prepare food and serve it at their own expense before filing paperwork requesting reimbursement. Several respondents expressed substantial concern about losing funds if they failed to correctly follow the appropriate steps in the reimbursement process. Failure to follow certain steps in the process or problems with reporting can result in the denial of a reimbursement request—in some circumstances, for all meals served at a site or multiple sites. The consequent ongoing uncertainty about whether their program would receive full reimbursement seemed to counteract one of the sponsors' primary incentives for participating in the SSMP program—higher reimbursements. In the case of those sponsors without any experience in summer meal programs, the uncertainty apparently deterred them from participating at all.

Sponsors mentioned problems with several aspects of the reimbursement process. One stated, "There was a big lag time in reimbursement. We won't know if we came out ahead or broke even, but [we are] probably coming out a little ahead." Another sponsor said, "If the program doesn't get enough kids, the sponsor has to delete the site from the system and the kids are pushed to another site." Several sponsors were worried that their boards would discipline them for entering a program where the stated benefits were not forthcoming. While clarifying expectations should help, this particular issue requires special attention given that reimbursement is a major consideration for sponsors in deciding whether to join the program.

FINDING 10: Heat Waiver Process Demonstrates How Administrative Burden and Reimbursement Uncertainty Can Discourage Sponsor Participation

The challenge posed by the excessive heat of the summer of 2012 illustrates the degree of concern over reimbursement issues. According to meteorologists, 2012 was the hottest year on record, and its summer was the third hottest ever.⁸ In fact, during the SSMP operations in July 2012, North Carolina recorded its second hottest month ever. Sponsors, site directors, and even state employees consistently identified problems resulting from the 2012 heat wave.

Site directors, who had the most direct contact with participants, commonly reported heatrelated issues. According to one site respondent, "We saw a drop in the numbers because we were serving at sites with no shade. We had to buy a pop-up tent for shade." Several site directors stated that the heat caused participation to drop, especially for inner city sites where kids had to walk to the site. Said one, "Some families said they couldn't come back because it was too hot to walk and [they] had run out of gas money."

Many sponsors also reported challenges related to the heat wave of 2012. Some sponsors considered themselves fortunate that all of their sites were indoors, but the majority expressed substantial concern about the challenges posed by extreme heat. One sponsor stated, "On hot days, the numbers dropped where kids had to walk. We served at 11:30 to avoid the hottest part of the day and bought tents for parks to help shade meals. But meals lose quality in heat, so we allowed fresh fruit to be taken home." Another noted, "I think the heat had something to do with our numbers dropping off in July. The first two weeks were high, but the numbers went down in July."

^{8.} National Oceanic and Atmospheric Administration, http://www.ncdc.noaa.gov/sotc/national/2012/8, accessed May 10, 2013.

Yet another sponsor said, "We did see a drop when the heat got intense. When the weather was cooler, kids in walking distance were there."

USDA regulations stipulate that participants must eat at the site.⁹ This presented a challenge for sponsors, who were concerned about losing reimbursement money if they ordered food but participation dropped off because of the heat. One sponsor said, "[The heat] was totally an issue. I'm not going to make kids sit out in 105 degree weather. The USDA really needs to wake up—last year they came out with a waiver about the heat but it was too late. We have a 4:30 snacks deadline, but with the heat it was moved to later, and that messed with the timing regs. If someone came along they could totally bust me, but I don't care." Another sponsor responded, "The heat was an issue, especially with two sites at parks and walkable sites that would have one kid show up on hot days. The problem is, the kids can't take anything off-site." Other sponsors also wrestled with this requirement, including one who stated, "The food must be consumed on-site, which is difficult when it's 115 degrees."

On August 7, 2011, the USDA released a waiver for "outdoor feeding sites experiencing extreme heat," which allowed sponsors to get reimbursed when children took meals off-site to avoid the heat. Although this waiver expired in September 2011, the excessive heat of 2012 again proved to be a barrier to feeding children when outside temperatures reached triple digits for days at a time. Despite the return of high temperatures, however, the USDA did not approve a waiver for the summer of 2012 until August 17th—after all of the SSMP feeding sites had closed for the season. This delay in issuing the waiver meant that sponsors were forced to wait until at least mid-August to find out whether meals would be fully reimbursed. Reimbursements were allowed if children took food off-site during the heat, but only if certain tracking information had been gathered at the time. The waiver's details on what tracking information was needed, however, were released only *after* the program was over, presenting yet another paperwork hurdle for sponsors.

In February 2013, the USDA issued a memo announcing a "Demonstration Project for Non-Congregate Feeding for Outdoor Summer Feeding Sites Experiencing Excessive Heat." According to the memo, this is a new waiver that makes the previous heat waivers permanent through the agency's authority to "develop and test alternative methods of providing access to summer meals for low income children," as provided in Section 749(g) of the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2010.¹⁰

It should be noted that while state officials are thrilled that the heat waiver is now permanent, yet more paperwork must be completed in order for sponsors to take advantage of the flexibility the waiver offers. The new waiver applies only on days when the National Weather Service issues an excessive heat advisory, warning, or watch for the area approved for outdoor feeding. Sponsors interested in participating in the heat waiver demonstration project are required to notify their state agency in advance of their intent to operate under the waiver, identify sites lacking temperature controls, and submit additional information with their monthly claims documenting the specific dates and number of claimed meals that were taken off-site by participants.

General feedback showed that individual schools place a high value on being able to keep their programs within budget. Local fiscal concerns are a sensitive enough issue that sponsors, whether they are schools or community partners, do not want to lose money on summer meals programs. This places local officials in a difficult situation. Because the SFSP offers reimbursements rather than advance funding, fiscal stability depends on a predictable and reliable reimbursement system.

^{9.} See congregate feeding requirements at 7 C.F.R. § 225.6(e)(15).

^{10.} Public Law No. 111-80.

The heat waiver situation shows how uncertainty in the reimbursement system can constrain local operators and keep them from using the program to its full potential. Day-to-day changes by staff to meet the needs of individual sites dealing with a heat wave could mean that meals would not be eligible for reimbursement. A school could lose money, and the school nutrition officer would be responsible. Administrative requirements are in place for specific reasons, including food safety and program accountability, but in certain circumstances those requirements impede or actually discourage use of the program.

PART III: Sponsor and Site Recruitment

The Super Summer Meals Pilot's participation goals required the state agencies involved and the No Kid Hungry NC staff to recruit pilot sponsors and site directors and encourage enrichment activities. These efforts included personal visits to local government officials, recruitment of new meal sites supported by government agencies and nonprofit partners, and one-on-one assistance with paperwork and inspections of new sites. Additionally, SSMP partners helped with site recruitment and paperwork in the eleven pilot LEAs participating in the waiver and the three additional non-waiver sponsors (Manna Food Bank, Food Bank of Central and Eastern North Carolina, and Charlotte-Mecklenburg Schools) that were included in the overall effort. SSMP partners also worked with the United Way, Communities In Schools North Carolina, and Latino organizations to encourage more organizations to sign up.

FINDING 11: Sponsors Did Not Receive Sufficient Support for Establishing New Meal Sites

The SSMP campaign included two dedicated recruiters, as well as several specialists housed within the DHHS offices to assist sponsors in recruiting and setting up new meal sites. Although many of the sponsors and site directors viewed the individual recruiters and employees in Raleigh favorably, there was universal agreement by the pilot sponsors that the overall commitment to recruitment failed to meet their expectations. They simply needed more help than was available. It is not clear whether sponsors had unrealistic expectations for assistance, could not or did not use the assistance that had been provided, or had expectations that were not fulfilled by the support staff. But whatever the reasons, the difference between support expectations and reality became a source of frustration.

To establish new sites, sponsors needed support in finding interested site directors (government agencies or nonprofit partners) and coordinating pre-approval site visits by authorized officials to verify that sites met safety and other requirements. Sponsors identified two categories of challenges: (1) identifying potential new sites and (2) moving to the next step by actually signing up potential sites. Although the latter was problematic, sponsors' primary frustration was the difference between expected and actual support for recruiting potential new target sites.

Along with the administrative issues discussed previously, the lack of recruitment support was among the main reasons sponsors gave for being unsure about or unwilling to repeat the program in 2013. One sponsor stated, "They asked, 'What can we do to help you get more sites?' which sounded great, but when they called back to ask about sites, I said, 'I thought you were doing that!' When school closed in June, I was left responsible for bouncing all over the county just to sign up sites. I thought, 'Wait a minute. This is not what I signed up for.'" Another sponsor said, "We were told we were going to get help with sites and getting them signed up, but that didn't happen. I thought they were going to help us get new sites, but . . . we recruited [88 percent] of them." Yet another sponsor stated, "I did all the recruiting myself. The [SSMP] reps came out to pre-approve sites and recruit, but I had already done all the recruiting."

FINDING 12: Additional Support for New Meal Sites Was Needed for a Longer Period of Time

In evaluating the SSMP recruitment and sign-up process, most respondents stated that they could have used more help for a longer period of time. As one sponsor noted, "We appreciated the help getting sites approved, but the recruiters were spread out this summer." Another echoed the idea of needing additional recruiter presence, stating, "We could have gotten a lot more sites signed up if we had more boots on the ground . . . we could have gotten a lot more done. I'm grateful for the help [we] did get, but they were spread so thin."

Although much of the problem could be addressed by managing sponsor expectations differently in the future, some of the problem also had to do with timing. As one sponsor stated, "The recruiters were good, but we needed more help.... They came out too late and stopped recruiting too early." Another sponsor stated, "Sites were filed and uploaded in the end of May, but the DHHS system didn't have them uploaded for a two-week lag time. Then, paperwork got caught up in the process." Issues with timing and recruiter capacity appear to be related to the challenges in identifying and signing up new sponsors for the SSMP, which happened closer to the summer than was anticipated. However, the timing problems also affected public communication, as discussed in Finding 17.

FINDING 13: Sponsor Support Overall Was Viewed Favorably

Most of the respondents appreciated the level of support and training offered to new or returning sponsors. However, there were two common suggestions for improvement: (1) more training and support specifically for dealing with the paperwork involved and (2) face-to-face training and support for maximum impact.

Almost half of the sponsors stated that additional training and support would have been useful given the substantial amount of paperwork required to run the program. Some criticism related directly to the webinar format, which some respondents argued was insufficient to adequately capture the complexities of the process. As one sponsor stated, "I thought I understood it, but then more and more requirements came to light. . . . After the webinar, I still didn't comprehend the amount of paperwork. I wasn't sure if I was doing it right." Another sponsor held a similar position, noting, "The initial first meeting was the webinar, which really hurt badly because it was too confusing. We needed a face-to-face meeting instead of a webinar because we were so new."

PART IV: Mini-Grant Support

Through No Kid Hungry NC, Share Our Strength provided small grants of \$800 to \$1,800 to the eleven LEAs, as well as to Kicking4Hunger (a North Carolina nonprofit offering free soccer clinics at meal sites), Charlotte-Mecklenburg Schools, the Food Bank of Central and Eastern North Carolina, and the Manna Food Bank (serving western North Carolina) to help offset program implementation costs. This support for operating costs proved to be one of the most favorably received aspects of the SSMP initiative.

FINDING 14: Sponsors Successfully Used Mini-Grants to Address Administrative Support Needs

Sponsors were unanimously positive about the small grants and commonly used them to fund part-time or short-term staff to help with paperwork. As one sponsor noted, "The mini-grants through DHHS were phenomenal. They allowed us to hire a monitor for the sites, which freed me up so that I could work on preparing for the school year. [Had I] had to do [it by] myself, it would have been hard." Several sponsors stated that they used the money for help with paperwork or for payroll to assist with the administrative process. Given the relatively small size of the grants, their role in supporting the administrative side of the program appears to have had a larger impact than expected.

FINDING 15: Mini-Grants Helped Address Food Transportation Barrier

One of the most common issues identified by sponsors and sites alike related to the problem of transporting food from the feeding center to the sites, especially for sites in rural counties where participants were widely dispersed. In fact, the majority of sponsors and site directors identified transportation challenges as an issue. Stakeholder concerns included liability issues, gas prices, and the summer 2012 heat wave. A number of sponsors used the mini-grants to deal with the transportation issues, including purchasing equipment to make it easier to transport food safely. Specifically, mini-grants were used to pay for items such as

coolers, foil wrapping, carriers, and other temperature controls. One sponsor's comment is representative: "We used the money to pay for transportation because we're so spread out." Another sponsor stated, "The mini-grant was a major help. It allowed us to get money to pay for transportation—one of our biggest hurdles. It also helped us pay for tents to use at the outdoor sites when the heat was a problem."

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PART V: Public Communication

As part of the Super Summer Meals Pilot initiative, the partnership developed public communication and advertising materials and used news releases, printed materials, and other means to inform families about the program. For example, the partnership created more than 10,000 summer meals posters for WIC offices, WIC retailers, and Social Services offices in counties with open sites and more than 200,000 summer meals postcards to be placed in backpacks in targeted pilot LEAs.

FINDING 16: Program Received Notable Media Coverage

The SSMP program was promoted through several high-profile media events. Among the most impressive was the June 14 event with Governor Bev Perdue at a statewide kickoff at Thomasboro Academy in Charlotte. In addition to the governor, other guest speakers joined the event and helped generate interest through print and online articles and coverage on three TV stations.

Throughout the summer, the SSMP partners earned other media coverage, including television spots, webpages, radio stories, and twelve newspaper articles. Sponsors also generated a substantial amount of earned media. In fact, most of the pilot LEA sponsors were successful in gaining coverage in local newspapers and on TV and radio stations.

FINDING 17: Time Constraints Hampered Distribution of Printed Promotional Materials but Locals Relied Successfully on Self-Produced Materials and Established Networks

The SSMP initiative created and provided posters, postcards, and online customizable PDFs to assist sponsors and site directors with public communication efforts. Although these materials were professionally designed and the number printed was adequate to reach the target audience, the effort was not initiated early enough in the school year and the time available for dissemination was too short. This problem with timing is related to the compressed schedule available to recruit and sign up pilot sponsors, which is discussed in Finding 8.

There was unanimous agreement among sponsors and sites that the materials arrived too late to distribute them to children. In fact, only two of the pilot LEAs were able to get the postcards into children's backpacks before the school year closed. One sponsor stated, "The printed materials were great, but they needed to go out a lot earlier. The fliers came when school was already closing down and no high school was in session. . . . Someone from DHHS was willing to bring the fliers by hand to get [them] here, but it was too late." Another sponsor stated, "The postcards arrived after the school had ended. A person from DHHS came with 30,000 cards and they're still in my closet. There was no information on them; they were too general and came too late to use them."

Some sponsors tried to mitigate the timing problem by using the fliers in other creative ways. One sponsor stated, "The Raleigh materials got here too late so we handed them out to the site supervisors, who put them up in grocery stores and the WIC offices. But, honest to goodness, they just got lost on the bulletin boards. I couldn't find them after I went to look."

Due to the need to generate public awareness about the local summer feeding opportunities (as opposed to general statewide program information) and the timing issues mentioned above for statewide material, most sponsors and site directors created their own materials, utilized existing communication networks, and came up with other creative strategies. Most sponsors and sites developed their own fliers and posters and tailored them with information specific to their locations. These promotional materials were distributed through existing networks available to the schools.

The most common creative strategy used to promote the program was the schools' ConnectEd robocall system, a free, user-friendly, and established communication network. Eight of the eleven sponsors used this or another call system to alert parents about the program. Sponsors also used school webpages, which were easy for them to design. Other creative approaches included door hangers, large banners at schools, yard signs, and printed menus. Sponsors and site directors felt that the locally produced materials were valuable and had a positive impact on recruiting individual participants to the feeding sites.

FINDING 18: On-Site Enrichment Opportunities Had a Positive Impact

Sponsors and site directors were encouraged to include enrichment activities throughout the summer to help draw participants to feeding sites. Super Summer Meals Pilot partners responded by designing numerous activities, including book readings, presentations by local firefighters, events at swimming pools, writing contests, hula hoop games, puzzles, artwork, dance performances, dentist visits, financial management discussions, talent shows, music, board games, movies, and more. Many of the respondents said they used mini-grant funds to support these activities.

One enrichment activity was an official partnership with the nonprofit Kicking4Hunger, which also received a mini-grant. Kicking4Hunger provides free soccer camps to help raise awareness about hunger issues, and they enlisted substantial support from student volunteers from the North Carolina School of Science and Mathematics to help organize the events. In the pilot LEAs where the enrichment activities took place, the programs appear to have had some role in helping recruit families who otherwise might not have participated due to social stigmas.

Although Kicking4Hunger tried to coordinate free soccer camps in cooperation with five of the pilot LEAs, the two camps planned for Stanly and Buncombe counties never materialized because of logistical difficulties. According to Kicking4Hunger coordinators, an additional source of frustration was the limited time frame available to set up the program, as discussed above. Kicking4Hunger coordinators would have liked a face-to-face meeting with SSMP partners earlier on to help them understand the administrative issues inherent in the feeding program. However, the coordinators felt that the experience was worthwhile in general and are interested in repeating it.

PART VI: Texting Service and Online Meal Site Locator

As part of the Super Summer Meals Pilot outreach effort, Share Our Strength—a national nonprofit leading the No Kid Hungry effort across multiple states—helped design and implement a new texting service and online meal site locator to help families find feeding sites. The texting capabilities enabled families to find nearby free meals by sending their zip codes and the message "FoodNC" to a specific number. Unfortunately, an assessment of the use of the texting service could not be made due to data tracking problems. Preliminary data suggest that more than 1,000 texts were received, but it is not clear how many were valid address requests. Additionally, an analysis of the online meal site locator is not yet available at this time due to incomplete data.

FINDING 19: Sponsors Promoted Texting Service but the Extent of Its Use Is Unclear

Despite the preliminary texting data reported above, most interviewees said that they were uninformed about the texting capabilities or thought the service was not valuable. The three respondents who were aware of the service stated that they did not detect any increase in participation, and one noted that the texts were sending people to the wrong sites (in another state) at first. Other potential issues identified by sponsors were related to program timing, with one sponsor stating, "I didn't notice a thing . . . the sites weren't up in time because we started too late." Another sponsor commented, "I don't know if the kids used it; I didn't see any difference. [The promotional materials] went out too late, during the last week of school." A similar comment came from another sponsor, who said, "I didn't notice anything. I tried it myself and it [worked] for me, but I'm not sure if [the promotional materials] went out in time."

Although other research may not support this view, it should be noted that some sponsors and site directors argued that children with few economic resources are unlikely to be able to afford cell phones and texting services. One sponsor said, "I guess most people did not use it because you have to pay for it. Same with the online thing: it's great for those with Internet, but they're usually not the people who need free meals." Another site director echoed this concern, stating, "A lot of kids don't have home phones or computers." Additional concerns were identified by sponsors working with members of vulnerable populations (such as immigrants) who were worried about revealing their identities. For example, one sponsor said that "some Latinos . . . were afraid they'd have to give their address or sign something, and [they] feared deportation. People don't want to have to identify themselves." This issue is noteworthy given the growing Latino population in North Carolina and potential for immigrants to participate in free summer feeding programs.

PART VII: Recommendations

Overall, the 2012 Super Summer Meals Pilot program was highly successful. It increased the number of sponsors, the number of meal sites for both pilot and continuing sponsors, and the number of meals provided and children served. The most well-received aspects of the pilot program included the higher reimbursement rate and the mini-grants. Sponsors and site directors expressed the greatest level of frustration over the continuing high level of administrative burden, which was contrary to their expectation that the burden would be substantively reduced through the USDA waiver.

Based on repeated interactions with the collaborators over time, our impression is that state staff, No Kid Hungry supporters, and local and nonprofit officials worked intensely under tight time and resource constraints in an effort to make significant gains in the program. As measured by the desired outcome—higher percentages of eligible children being fed—the pilot was a success. At a work-effort level, however, continued success cannot be ensured without additional programmatic improvements. Based on the evidence in this evaluation, we provide the following recommendations for better program participation.

RECOMMENDATION 1: Administrative Burden Needs to Be Better Understood So That Process Improvements Can Be Identified

Administrative burden was clearly identified in the interviews as the primary barrier to expanding the program, and a more accurate appraisal of the ongoing administrative hurdles is in order. We recommend identifying additional areas for streamlining the administrative process. A comprehensive process evaluation is warranted so that program officials can understand the exact nature of the burden, identify the appropriate level of government responsibility for administration of the program, and target opportunities for both incremental change and transformative leaps in the process. In addition to decreasing the administrative burden, SSMP needs to set more realistic expectations for new sponsors.

RECOMMENDATION 2: Program Partners Should Continue Mini-Grant Funding

The mini-grants were a clear and measurable success. They were used to add small amounts of additional capacity (people or equipment) that in turn allowed for significant gains for sponsors. We noted that various sponsors did not even ask for the full mini-grant amount available. Instead, they asked for small amounts for specific purposes that would enable them to provide wider services.

RECOMMENDATION 3: Program Partners Should Track Texting Service

Although the texting service idea holds promise, it is not clear whether it lived up to its potential. It is important to track the cost and actual usage of this tool if it is employed in the future.

RECOMMENDATION 4: Program Partners Should Start Program Setup Earlier

Materials designed to recruit eligible children need to be received by schools much earlier in the school year. However, many of the problems related to timing were the result of the experimental nature of the pilot and should be easier to avoid in the future.

RECOMMENDATION 5: Close Collaboration among Program Partners Should Continue

One of the less acknowledged contributors to the success of the 2012 SSMP program was the degree of cooperation between state agencies, nonprofit groups, and members of academia. Although it was not a focus in the evaluation framework adopted at the beginning of this process and is not something that we can measure objectively, we cannot help but recognize the benefit of the collaboration between the state agencies involved. DPI, DHHS, and No Kid Hungry NC staff worked together intensively throughout this process. We note, however, that a continued focus on administrative burden should not be limited to the local level: further work in this area should also address the administrative burden at the state level.

APPENDIX: Super Summer Meals Pilot Sponsors, Meal Sites, and Grant Recipients

SSMP LEA Sponsors	County
Asheville City Schools	Buncombe
Bertie County Schools	Bertie
Buncombe County Schools	Buncombe
Cumberland County Schools	Cumberland
Edgecombe County Schools	Edgecombe
Hoke County Schools	Hoke
Johnston County Schools	Johnston
Montgomery County Schools	Montgomery
Roanoke Rapids City Schools	Halifax
Stanly County Schools	Stanly
Warren County Schools	Warren
SSMP Meal Sites	County
Badin United Methodist Church	Stanly
Benson Elementary	Johnston
Bertie High School	Bertie
Breath of God Worship Center	Cumberland
Cedar Grove AME Zion Church	Stanly
Community Performing Arts Club	Cumberland
Erwin Swimming Pool	Buncombe
Family Connections	Edgecombe
First Presbyterian	Buncombe
First Presbyterian Church, Norwood	Stanly
Georgia Avenue Apartments	Halifax
Leicester Elementary	Buncombe
WCTS/NWHS	Warren
SSMP Grant Recipients	County
Charlotte-Mecklenburg Schools	Mecklenburg
Food Bank of Central and Eastern NC	Wake
Kicking for Hunger	Orange
Manna Food Bank	Buncombe

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