



# ENDING HUNGER IN OKLAHOMA

An assessment of food insecurity and resources in Oklahoma.



## // Acknowledgements

This assessment was primarily written and compiled by the Texas Hunger Initiative's assistant director of research, Erin Nolen, with support and contributions from Doug McDurham, Kasey Ashenfelter, Riya Rahman and other members of the Texas Hunger Initiative staff. It was designed by Cedar Gandy.

This major step toward solving hunger in Oklahoma was funded by

**THE ANNE & HENRY ZARROW**  

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**F O U N D A T I O N**

In Oklahoma, 652,090 people are food insecure—220,000 of them are children.<sup>1</sup> This means that right now, all across the state, individuals may have to decide between paying their electric bills or buying groceries. Parents may skip breakfast so that their children can eat. Children may not have consistent access to meals over the weekend or during the summer.

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This is unacceptable.  
And it is costing us.

Hunger contributes to nutritional deficits that can undermine people's health, diminish human capital, and inhibit children's development. These negative effects cost us in greater health care expenses and reduced worker productivity.

Children facing food insecurity also likely face poorer health and lower academic achievement. Food-insecure adolescents experience more problems with mental health, and food-insecure adults face the prospect of poorer physical health and higher rates of being overweight and diabetic. The effects of food insecurity are far reaching and ultimately threaten our health care system, our educational system, and our economy.<sup>2</sup>

**But food insecurity is a solvable problem. With better policies, more collaboration, and effective federal programs outreach, we can provide more food to more people.**

This report provides a look into the problem of food insecurity in Oklahoma, the tools available to fix it and next steps we can take toward solving the problem—steps that will lead to better, more productive lives for all Oklahomans.

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**WE ARE MOVING  
TOWARD SOLVING  
THE PROBLEM**

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# Introduction

**T**he Texas Hunger Initiative (THI) has partnered with The Anne and Henry Zarrow Foundation to assess hunger in Oklahoma. This report includes an overview of key federal nutrition programs, an assessment of program participation and trends, and an estimation of the potential for growth with respect to both the number of people who would be served and the increased state and local revenue with expanded program participation.

To compile the report, THI staff conducted informal interviews and site visits with individuals who are involved in addressing hunger in Oklahoma: program staff, department directors, advocates, policy analysts, legislative staff, and community organizers. Organizations that THI contacted include the Oklahoma Department of Human Services, the Oklahoma State Department of Health, the Oklahoma State Department of Education, the Regional Food Bank of Oklahoma, the Community Food Bank of Eastern Oklahoma, the Chickasaw Nation, nonprofit organizations, foundations, and more. THI staff combined information learned from these conversations with data from the state of Oklahoma, the U.S. Department of Agriculture, and the Food Research and Action Center to complete the assessment.

*Despite the high food insecurity rate and barriers to eliminating hunger in Oklahoma, the programs and resources to solve hunger are available and many people are already doing the hard work of addressing the issue.*

From here, it is a matter of organizing, convening, and strategizing to promote maximum access and participation in anti-hunger programs. In fact, one advocate we spoke with indicated that in Oklahoma, “there are lots of arms and legs, but they aren’t connected to a head, which is really important,” implying the need for a convener. Another advocate applied a sense of urgency to this need for coordination: “...More people working on [hunger] would make a lot of difference. An active coalition of advocates would go a long way...I just wish we had that infrastructure in place now (or ideally, several years ago).”

The following report is an embodiment of this sense of urgency – it is an informational analysis of the programs, participation, and barriers related to hunger in the state and serves as a springboard for comprehensively addressing the issue of hunger in Oklahoma.

# Executive Summary

**A** ccording to the United States Department of Agriculture (USDA), **15.5 percent of households in Oklahoma experienced food insecurity in 2015.**<sup>3</sup> In fact, the Oklahoma food insecurity rate is significantly higher than the national average.<sup>4</sup> Hunger is a serious problem in the state of Oklahoma, and with the decline of the oil and gas economy, state budget shortfalls,<sup>5</sup> and an increase in the number of schools moving to a four-day school week,<sup>6</sup> ensuring that children and families have consistent access to food throughout the year is more important than ever.

Fortunately, many tools for addressing hunger already exist. Oklahoma has a robust charitable food system supported by nonprofits and congregations and anchored by its two Food Banks. However, federal nutrition programs are a foundational tool in Oklahoma, because the federal funding, state administrative structure, and food resources are in place – capitalizing on these resources will maximize their impact on hungry Oklahomans. Federal nutrition programs include the Supplemental Nutrition Assistance Program (SNAP), Women, Infants, and Children (WIC), the School Breakfast Program, the National School Lunch Program (NSLP), the Afterschool Meals Program, and the Summer Meals Program. Additionally, multiple federal food distribution programs operate in the state.



SNAP is a particularly important safety net program that is intended to respond to economic downturns. Even with a relatively high SNAP participation rate (80%),<sup>7</sup> there is unmet need. Oklahoma's WIC program has experienced both growth and set-backs. With the implementation of the new electronic WIC cards, barriers to WIC redemptions have been reduced.<sup>9</sup> However, the WIC participation rate dropped at an alarming rate between 2012 and 2013.<sup>10</sup> The increased enrollment among infants in SoonerCare,<sup>11</sup> coupled with the decrease in number of individuals participating in WIC,<sup>12</sup> indicates unmet need throughout the state.

During the 2014-2015 school year, more than half (58.5%) of students who participated in free and reduced-price lunch participated in school breakfast.<sup>13</sup> Though this participation ratio does not yet meet the Food Research and Action Center's (FRAC) recommended benchmark of 70 percent, it is higher than the national average (54.3%) and has stayed relatively consistent over the last six years (meaning there were no significant dips or declines).

In 2015, 6.4 percent of students who participated in free and reduced-price lunch participated in the Summer Meals Program. The summer participation ratio is the lowest of Oklahoma's child nutrition programs, and is ranked 51<sup>st</sup> in the nation.<sup>14</sup> Clearly, there is significant room for improvement in the program. In 2014-15, on an average day 22,039 students received a meal or snack at an afterschool program,<sup>16</sup> meaning only 7.4 percent of students eligible to participate in an afterschool meal program were receiving a snack or meal. Suppers only made up six percent of afterschool meals served—the other 94 percent were snacks, which receive much less in reimbursement.<sup>15</sup> With the increased afterschool programming in Oklahoma, and the opportunity to transition from serving snacks to meals, there is increased infrastructure to maximize this program.

Feeding America estimates that Oklahoma residents would need an additional combined \$320.6 million each year to meet their food needs.<sup>17</sup> Oklahoma has the potential to surpass this.

**Through increased illness and decreased academic achievement alone, hunger costs Oklahoma more than \$1.5 billion each year.**

With targeted program expansion across the priority federal nutrition programs, the state could accrue an additional \$404.5 million, with a total potential of \$1.5 billion.

Oklahoma should prioritize three objectives to effectively address the existing gap in hunger resources. First, stakeholders across the state must be convened to ensure that state agencies, policies, and legislative actions are efficient and effective. Second, Oklahoma must lead the way in creating and supporting statewide and community-level collaboration. No single person or entity is responsible for ending hunger so all must come to the table. Finally, Oklahoma must expand participation in federal programs by forging public-private partnerships to develop and implement aggressive, data-driven outreach and expansions plans. With Hunger Free Oklahoma's resources and focus, these three objectives are an achievable action plan to ending hunger in Oklahoma.



The image features a close-up of a light-colored wooden surface, possibly a table, with a prominent grain and several knots. On the right side, a large, white, circular shape, resembling a plate or a lid, is partially visible. The text is positioned on the white surface.

**WHEN WAS THE L  
WENT TO BED**

A photograph of a white ceramic plate and a silver metal fork resting on a light-colored wooden table. The plate is on the left side of the frame, and the fork is positioned horizontally behind it, with its tines pointing to the right. The wood grain of the table is clearly visible, running horizontally across the image. The lighting is soft and even.

**LAST TIME YOU  
D HUNGRY?**

# The Problem of Hunger in Oklahoma

## // Food Insecurity

**F**ood insecurity and hunger are often used interchangeably, and both indicate a lack of food resources to live a healthy life. More precisely, the U.S. Department of Agriculture defines food insecurity among households as an inability, at some time during the year, to provide adequate food for one or more household members due to a lack of resources.<sup>18</sup>

According to the USDA's 2015 data, 15.5 percent of households in Oklahoma experienced food insecurity. Oklahoma, along with 11 other states, has a food insecurity rate statistically significantly higher than the national three-year average (13.7%). It is important to note that food insecurity increased in Oklahoma between 2010-2012 and 2013-2015 while the national average declined.<sup>19</sup>

**The Oklahoma food insecurity rate is higher than the national average.<sup>21</sup> According to Map the Meal Gap,<sup>22</sup> the number of food-insecure individuals in Oklahoma is 652,090. This means that Oklahoma is among the top 10 most food-insecure states in the nation.<sup>23</sup>**

Oklahoma's hunger problem is connected to its high poverty rate which carries serious costs for Oklahomans. Hunger costs Oklahoma more than \$1.5 billion each year through increased illness and decreased academic achievement alone.<sup>24</sup>

Although related, food insecurity and poverty are not the same. Poverty in the United States is only one of many factors associated with food insecurity. In fact, higher unemployment, lower household assets, and certain demographic characteristics are also associated with a lack of access to adequate, nutritious food.<sup>25</sup>

## // Consequences of Food Insecurity<sup>26</sup>



### HEALTH: FOOD INSECURITY

- + exacerbates chronic illnesses, including kidney disease, hypertension, diabetes, and obesity;
- + in utero and in the first three years of life can lead to low birth weights, developmental delays, and decreased language acquisition.



### EDUCATION: CHILDREN IN FOOD-INSECURE FAMILIES MAY EXPERIENCE

- + lower reading and math scores;
- + more significant behavior and social problems;
- + lower high school graduation rates.



### ECONOMY: FOOD INSECURITY NEGATIVELY IMPACTS THE ECONOMY BY

- + weakening the labor force;
- + decreasing human capital and educational skills;
- + increasing health care costs.

## PREVALENCE OF FOOD INSECURITY IN THE U.S. AND OKLAHOMA, 2004-2015

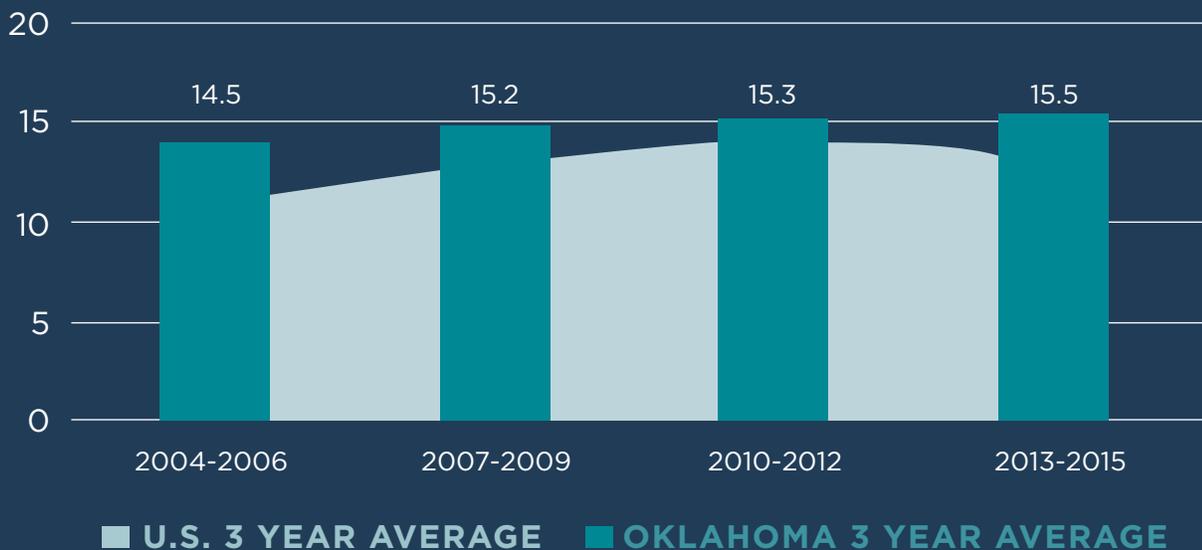


Figure 1. Food Insecurity in the U.S. and Oklahoma, 2004-2015.



## // Hunger in Oklahoma

In Oklahoma, nearly 24 percent of children live in food-insecure households,<sup>27</sup> and 62 percent of Oklahoma public school students are enrolled in the free or reduced-price meal program.<sup>28</sup> Many of these students do not have access to adequate nutritious food over the weekends, holidays, and during the summer. Not having enough to eat affects children’s physical and neurological development, can trigger behavioral and mental health issues, and detracts from their ability to learn in school.<sup>29</sup> Children who experience food insecurity may be at higher risk for chronic illness, truancy and tardiness, and behavioral problems such as fighting and hyperactivity.<sup>30</sup>

Hunger is not a problem facing just children and families in Oklahoma. Senior adults struggle with food insecurity. Seniors with limited mobility can have a difficult time shopping for food, applying for federal food aid, and preparing meals for themselves. For those who receive food from Oklahoma food banks, 1 in 11 report having to choose between buying food or paying for medicine and medical care.<sup>31</sup> Historically, senior adults are less likely to apply for and receive SNAP.<sup>32</sup>

Along with affecting different age groups, hunger also affects different geographic areas. In fact, rates of both food insecurity and hunger are significantly higher in non-metropolitan areas. **Access to food supplies is additionally more limited in rural areas. Thirty-two of Oklahoma’s 77 counties contain food deserts, meaning that at least 25 percent of their population lives ten miles or more from a supermarket or supercenter.** Nine counties, including Cimarron, Dewey, Ellis, Grant, Greer, Harmon, Harper, Hughes, and Jefferson counties, are severe food deserts. Rural Oklahoma additionally has a much lower concentration of charitable food services than in urban areas.<sup>33</sup>



**1 IN 11 SENIORS CHOOSE BETWEEN  
BUYING FOOD OR PAYING FOR  
MEDICAL CARE.**

# Addressing Hunger in Oklahoma

## // Private Assistance

Individuals and organizations throughout Oklahoma—in its larger cities and its rural communities—are working to support their neighbors struggling with food insecurity. According to Map the Meal Gap, approximately, “35 percent of children who are food insecure are likely ineligible for federal nutrition programs because they live in households with incomes above 185 percent of the federal poverty level.”<sup>1</sup> Even though federal nutrition programs are foundational to curbing hunger, private assistance is essential to help fill in this gap in program coverage.

Utilizing donated food, private dollars, and state and federal resources, Oklahomans are helping Oklahomans. This section will provide an overview and highlights of the current, private anti-hunger efforts in Oklahoma. The collection of work listed here is not comprehensive but offers information on different types of anti-hunger work and organizations. It also provides an example of what’s being done in Oklahoma and insight into where we need to go next if we’re going to put an end to food insecurity in our state.

## // Food Banks

Across the country, the members of the Feeding America network of food banks are at the forefront of anti-hunger work. There are two Feeding America food banks that serve Oklahoma—the Regional Food Bank of Oklahoma and the Community Food Bank of Eastern Oklahoma. It should be noted that while private and charitable resources are significant to the food banks, their impact is not independent from their partnerships with federal nutrition programs (including child nutrition and food distribution programs) and SNAP outreach efforts.

Combined, the two food banks in Oklahoma distribute 68.6 million pounds of food annually, which translates into approximately 57.2 million meals. The food banks provide enough food to feed more than 160,000 people each week, including 59,200 children. A total of 1,650 agencies and schools partner with Oklahoma food banks to operate food programs to feed Oklahoma’s hungry.<sup>2</sup> The Regional Food Bank of Oklahoma and Community Food Bank of Eastern Oklahoma both operate a variety of programs aimed at serving diverse demographics and focused on providing access to food and nutrition education.

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Utilizing donated food,  
private dollars, and state  
and federal resources,  
Oklahomans are helping  
Oklahomans.



## // The Regional Food Bank of Oklahoma

The Regional Food Bank of Oklahoma distributes food and other products in 53 counties through a network of more than 1,300 partners, including food pantries, homeless shelters, church pantries, soup kitchens, Food Resource Centers and schools. In 2016, the Regional Food Bank provided 52 million pounds of food, enough to feed 126,000 individuals every week.<sup>3</sup> The following are examples of programs run by the Regional Food Bank:

**FOOD FOR KIDS:** In fiscal year 2015, more than 37,600 children received over 3.2 million meals through the Food for Kids programs: Backpack Program, Kids Café, Summer Feeding, and School Pantries.

**FRESH RX:** Fresh RX is an effort to improve health outcomes for low-income, high-risk individuals. Through a combination of healthy food distributions, targeted clinical care, nutrition education, and wellness resources, Fresh RX eliminates barriers to improved health, including a lack of access to healthy food and transportation challenges.

**SENIOR FEEDING:** The Senior Home Delivery program is available at 26 sites. Home delivery meal programs partner with Senior Feeding to identify their clients who are at a risk of going hungry. The programs then deliver sacks of nonperishable foods—free of charge—to more than 500 clients once a month.

A mobile market also visits senior centers toward the end of each month. The Regional Food Bank contracts with the Oklahoma Department of Human Services to distribute the Commodity Supplemental Food Program (CSFP). CSFP works to improve the health of low-income seniors, age 60 or older, by supplementing their diets with nutritious USDA commodity foods.

**URBAN HARVEST:** Urban Harvest is a sustainable gardening program that teaches people how to grow their own food. The garden hosts field trips, provides produce for the food bank to distribute, and offers education on sustainability and conservation.

**HUNGER 101:** Hunger 101 is a curriculum that educates students from all backgrounds, grades 3-12, on local hunger issues and empowers them to take part in fighting hunger in Oklahoma.

**FOOD RESOURCE CENTERS:** Food Resource Centers provide:

- + Greater access to food with extended hours and days of operation;
- + Client-choice shopping to improve the overall client experience, giving the client the opportunity to choose foods they need and want in a setting similar to a supermarket;
- + An emphasis on nutritious foods, especially fresh fruits and vegetables;
- + Increased access to nutrition education and additional services, resources, and referrals to improve family stability including services provided by other agencies and nonprofit organizations (dental, vision, employment, housing, etc.).<sup>4</sup>

**21.1  
MILLION LBS.  
OF FOOD**



**PROVIDED MORE THAN  
339,000 MEALS EACH WEEK  
TO PEOPLE STRUGGLING  
WITH HUNGER.**

## // Community Food Bank of Eastern Oklahoma

The Community Food Bank of Eastern Oklahoma (CFBEO) has locations in Tulsa and McAlester and provides food and other donated goods to 450 Partner Programs in 24 counties of eastern Oklahoma. During fiscal year 2016 (FY 2016), CFBEO distributed more than 21.1 million pounds of food, providing more than 339,000 meals each week to people struggling with hunger. Its programs include on-site feeding programs, emergency shelters, emergency food pantries, children's feeding programs, senior meal programs, and veteran outreach initiatives. The following are examples of programs run by the Community Food Bank:

### **FOOD FOR KIDS PROGRAM**

Food for Kids is a four-part program that ensures food-insecure children have a resource for nutritious meals throughout the year through the Backpack Program, School Pantries, Free Family Farmers' Markets, and Extended School Holiday Feeding. The program provided 228,538 meals and 160,756 backpacks to children in FY 2016.

### **HEALTHY COOKING CLASSES**

Healthy Cooking Classes serve low-income families at risk of hunger by educating and empowering them with skills, knowledge, and confidence to make healthy, affordable meals at home. 2,002 people participated in 75 classes in FY 2016.

### **SENIOR SERVINGS PROGRAM**

The Senior Servings Program provides healthy, nutritious food assistance to low-income senior citizens. Special attention is paid to include a variety of produce, whole grains, lean protein, low-fat dairy products, and items low in sodium and sugar. 1,692 seniors received assistance at 33 sites in 13 counties in FY 2016.

### **MOBILE EATERY (ME)**

Mobile Eatery (ME) food trucks provide meals to low-income communities focusing on extended school breaks for children and providing meals during food pantry and Senior Servings distributions. Unlike brick-and-mortar programs, ME has the ability to easily serve several locations in a matter of hours. The program served more than 26,500 meals in FY 2016.

### **CULINARY TRADE PROGRAM**

The Culinary Trade Program offers a fresh start to low-income individuals looking to gain culinary training for future employment. While students in the program develop career skills, they also help prepare more than 1,500 meals a week for the hungry.<sup>5</sup>

## // Meals on Wheels

Meals on Wheels delivers nutritious meals, friendly visits, and safety checks to seniors that may not otherwise have a hot meal or see a friendly face. Community-based Meals on Wheels programs can be found across Oklahoma. Meals on Wheels of Norman delivers approximately 80,000 nutritious meals per year to the elderly, ill, and disabled in its community.<sup>6</sup> Meals on Wheels of Tulsa delivered approximately 267,000 meals in 2015 and, in addition to delivering in most areas of the City of Tulsa, also serves communities including Jenks, Bixby, Broken Arrow, Sand Springs, and Owasso.<sup>7</sup> Meals on Wheels of Tulsa also has an impact beyond seniors through its *Feed Our Future* program, which assists high school students in the Tulsa public schools that face food insecurity by providing them with meals.<sup>8</sup> Meals on Wheels and similar programs also serve smaller and rural communities including Elk City, Kingfisher, Ketchum, and Woodward, among others.



## // Councils and Coalitions

Communities across the country are full of individuals and organizations doing great work. Often they work in silos, doing their own projects and having their own impact, but not connecting with others working in the same arena. Councils and coalitions work across sectors, engaging with government policy and programs, grassroots and nonprofit projects, congregations, local businesses, food workers and farmers, among others, bringing individuals together, helping them focus on similar goals and building synergy that is greater than the sum of their parts.



## TULSA FOOD SECURITY COUNCIL

The Tulsa Food Security Council brings together anti-hunger and food justice advocates, educators, nonprofit organizations, concerned citizens, government officials, farmers, grocers, chefs, workers, food processors, and food distributors, in an effort to strategically and comprehensively address food insecurity.

Efforts include:

- + Advocating for policy change to improve the food system;
- + Raising awareness and providing education about health related issues;
- + Connecting a variety of cultures through education of food, health, and wellness, and;
- + Fostering sustainable economic opportunities connected to local food systems.<sup>9</sup>

## // Local Nonprofits & Congregations

Every day, local nonprofits connect with food-insecure individuals, providing food and resources. They fill a variety of roles, including food bank partner agencies distributing food, providing case managers who offer guidance, and at present, serve as the ground-level foundation of the anti-hunger work in Oklahoma.

**THE THIRD PLACE COMMUNITY CENTER, TURLEY, OK** is a grassroots organization designed to meet the specific needs of its community. It includes a pantry that is set up like a corner store, provides a library, clothing store, health clinic, access to computers and the internet, and garden beds and fruit and nut trees to grow healthy food for the community.<sup>10</sup>

**KERR CENTER, POTEAU, OK** focuses on growing food and sustainable agriculture. On its 4,000-acre ranch, the Kerr Center focuses on the practice of and education on sustainable agriculture and conservation. The Center also advocates on behalf of farmers, ranchers, and rural communities and for a healthy, sustainable food system.<sup>11</sup>

## // Colleges and Universities

Colleges and universities are uniquely situated to address food insecurity. They can complete research studies, develop strategies across disciplines, and utilize their networks to affect change.

### OKLAHOMA STATE COOPERATIVE EXTENSION SERVICE

The Oklahoma Cooperative Extension Service is a part of Oklahoma State University. The Extension Service operates a variety of programs in counties across the state, including ones that focus on food, nutrition, and health. The Family and Consumer Sciences Extension unit focuses on issues that affect Oklahomans daily lives, offering research-based education to support a variety of areas including money management, meal planning and preparation, and growing food.<sup>12</sup>

The Oklahoma Cooperative Extension Service also operates a SNAP-Ed program aimed at helping SNAP participants make the most of their resources and make healthy food and diet choices. In 2015, SNAP-Ed reached 2,109 adults and 21,140 youth directly and more than 6,000 additional family members indirectly. Beyond being beneficial to SNAP participants, the SNAP-Ed program also leverages federal and state funds and provides approximately 85 job opportunities to local citizens, which contributes more than \$2 million to the state economy in salary and benefits.<sup>13</sup>

### OKLAHOMA NUTRITION INFORMATION AND EDUCATION

Another university-based anti-hunger program is Oklahoma Nutrition Information and Education (ONIE). ONIE is funded by the United States Department of Agriculture through the Oklahoma Department of Human Services and housed at the University of Oklahoma Health Sciences Center's College of Public Health, Department of Health Promotion Sciences. The project offers education on nutrition and physical activity with the goal of improving the health of Oklahoma families. Examples of education offered by ONIE include ideas for stretching food budgets, making healthy food choices, and shopping for low-cost, healthy meals.<sup>14</sup>



The organizations listed are just a small sample of the great work that is happening across the state, but they demonstrate many of the efforts currently happening in Oklahoma. **Despite the tireless work of local and state organizations, food insecurity is still a serious problem in Oklahoma and is worse in our state than in most others.** The private food assistance in the state faces several challenges that will need to be addressed for them to be more successful in reducing food insecurity.

## // Barriers

**A**wareness, or a lack thereof, is a substantial barrier to solving hunger—both awareness of the problem of hunger and awareness of the resources available to individuals and families. As one community organization said, “people either don’t know about us or think they would not qualify.” This lack of awareness results in services being underutilized and eligible individuals going hungry. Anti-hunger organizations would benefit from a coordinated effort to raise awareness of available resources and to remove the stigmatization of these resources.

Another challenge in Oklahoma is the significant number of rural communities in the state. While rural communities are built on a deep sense of community and value taking care of their own, it can be a challenge to get available services and resources to geographically-distant or isolated communities. Creative strategies to connect with rural communities and meet their needs could have an important, positive impact.

While the geographical distance between communities poses a challenge, disconnection between organizations, resources, and anti-hunger efforts in the state in general is an area that can be improved in Oklahoma. Greater coordination and collaboration can reduce costs, improve the quantity and quality of services, help identify, and meet needs that are not being addressed, and reduce duplication. This builds a more efficient and comprehensive solution to food insecurity.

# Federal Nutrition Programs

## // Introduction

Federal nutrition programs are foundational to addressing hunger in Oklahoma because federal funding, state administrative structures, and food resources are already in place – we just need to capitalize on these resources to maximize their impact. These federal nutrition programs include the Supplemental Nutrition Assistance Program (SNAP); the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); the School Breakfast Program; the National School Lunch Program (NSLP); the Afterschool Meals Programs (including NSLP and CACFP); and the Summer Meals Program. The USDA also administers the Fresh Fruits & Vegetable Program, senior food assistance programs, and more than thirty commodities to schools programs. Additionally, there are several food distribution programs, a few of which are discussed on the next page.

Federal funding for these programs flows from the USDA to three Oklahoma state agencies to implement the programs. SNAP and WIC provide monetary food benefits, child nutrition programs provide meals directly to children, and the food distribution programs provide in-kind food to eligible individuals. This chapter provides an overview of the administration of and participation in federal nutrition programs in Oklahoma.

The **Supplemental Nutrition Assistance Program (SNAP)** is the largest federal nutrition program administered by the USDA and managed at the state level through the Oklahoma Department of Human Services (OKDHS). SNAP provides food benefits, via an electronic benefits card called Access Oklahoma, to low-income individuals and families. Of the major federal nutrition programs in Oklahoma, SNAP serves the most people and accrues the most reimbursements for the state.



## // Supplemental Nutrition Assistance Program



The **Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Program** provides food benefits through an electronic card or paper voucher, in addition to nutrition and breastfeeding curriculum for pregnant and post-partum women, infants, and children under five. The USDA administers WIC at the federal level, and the Oklahoma State Department of Health (OSDH) and nine Indian Tribal Organizations (ITOs) manage the program at the state level.

The federal child nutrition programs include the School Breakfast Program, Afterschool Meals through both the National School Lunch Program (NSLP) and Child and Adult Care Food Program (CACFP), and the Summer Meals Programs. They are administered by the USDA and managed at the state level through the Oklahoma State Department of Education (OSDE).

The food distribution programs include the **Food Distribution Program on Indian Reservations (FDPIR)**, the **Commodity Supplemental Food Program (CSFP)**, and **The Emergency Food Assistance Program (TEFAP)**. FDPIR provides food to tribal citizens in the State of Oklahoma and is managed by the 10 ITOs. CSFP and TEFAP are managed by the Oklahoma Department of Human Services (OKDHS) and facilitate partnerships with the food banks (and sometimes other entities) to deliver food to eligible individuals.

The Supplemental Nutrition Assistance Program (SNAP) is the largest of the domestic nutrition assistance programs and is the most responsive to providing additional assistance during economic downturns.<sup>1</sup> SNAP benefits supplement the monthly food budgets of low-income households through the issuance of monthly benefits, via an electronic benefits card, which can be used to purchase food at authorized grocery outlets and farmers' markets. Oklahoma participants use an electronic benefits card called Access Oklahoma, which operates similarly to a debit card. The card is accepted at 3,029 retail grocery outlets, including farmers' markets throughout the state, and can be used to purchase food items.<sup>2</sup>

### ADMINISTRATION OF SNAP IN OKLAHOMA

In Oklahoma, the Department of Human Services' (OKDHS) Adult and Family Services division operates SNAP, in addition to other social safety net programs, including, Temporary Assistance for Needy Families (TANF), SoonerCare (Medicaid), child care subsidies, Low Income Home Energy Assistance Program, and State Supplemental Payments. Due to the State of Oklahoma's budget shortfall in fiscal year 2015, along with the increase in operational costs due to growing child welfare caseloads and diminished federal share of Medicaid program costs, the department had to reduce administrative expenses by eliminating 25 percent of staff (or 1,900 positions).<sup>3</sup> This reduction impacted staffing in several areas, resulting in a loss of programming and IT staff.

Oklahoma's application system is a hybrid paper and online system. If applicants are renewing, they may do so through the OKDHS Live! online portal. However, new applicants must fill out a paper application and submit it to any of the 77 county offices across the state. Due to budget cuts, OKDHS staff indicates that the electronic system for application procedures will not be updated for at least another five years.<sup>4</sup>

## SNAP HOUSEHOLD AND INCOME LIMITS<sup>5</sup>

HOUSEHOLD SIZE	1	2	3	4	5	6	7	8
<b>GROSS MONTHLY INCOME</b> (130% poverty level) (w/out elderly or disabled)	\$1,276	\$1,726	\$2,177	\$2,628	\$3,078	\$3,529	\$3,980	\$4,430**
<b>MAXIMUM MONTHLY NET INCOME</b> (after household deductions & all elderly & disabled)	\$981	\$1,328	\$1,675	\$2,021	\$2,368	\$2,715	\$3,061	\$3,408***
<b>MAXIMUM MONTHLY BENEFIT ALLOTMENT</b>	\$194	\$357	\$511	\$649	\$771	\$925	\$1,022	\$1,169****

\*\*For each additional household member over 8, add \$451.  
 \*\*\*For each additional household member over 8, add \$347.  
 \*\*\*\*For each additional household member over 8, add \$146.

Figure 2. SNAP Household and Income Limits

### ELIGIBILITY & PARTICIPATION REQUIREMENTS

To be considered eligible for SNAP, individuals must be a U.S. citizen or lawfully present non-citizen; meet work requirements (these include registering for work, not voluntarily quitting a job or reducing hours, taking a job if offered, and participating in employment and training programs); meet income standards (see Figure 2); and have a social security number for all members in the household.<sup>6</sup>

In addition to the above-listed eligibility requirements, states have flexibility in setting eligibility determinations for specific policies related to income and assets. For example, Oklahoma (along with 21 other states) excludes one vehicle per adult when factoring in assets to determine SNAP eligibility. (32 state agencies exclude the value of all vehicles entirely.)<sup>7</sup>

While gross and net income eligibility requirements apply for most households, a household with an elderly person or a person who is receiving specific disability payments only has to meet the income test.<sup>8</sup>

In addition to income and assets, individuals must meet work requirements, meaning individuals must be working, looking for work, or participating in a training program. Further, in order for able bodied adults without dependents to receive SNAP benefits for more than three months within a 36-month period, they must work or participate in a work program for at least 20 hours per week.<sup>9</sup> This three-month time limit on SNAP benefits (specifically for unemployed adults aged 18-49 who are not disabled or raising children) has not been in effect for most states over the last few years “since many states qualified to waive the time limit throughout the state due to high unemployment rates during and since the Great Recession.”<sup>10</sup> However, since unemployment rates have decreased, more than 40 states, including Oklahoma, now implement the time limit. In Oklahoma, the number of caseloads quickly declined within three months after the time limit was re-imposed in fiscal year 2014. (We will revisit this in the SNAP Participation Trends section.)<sup>11</sup>

## APPLICATION PROCESS

Individuals applying for the first time may visit a local Department of Human Services (DHS) office to obtain an application or apply by printing and completing the Request for Benefits form and then mail, fax, email, or take it to a local DHS office.<sup>12</sup> The OKDHS does not provide a downloadable application on its website for first-time users, but the Community Food Bank of Eastern Oklahoma provides an online PDF version (in English and Spanish) on its website<sup>13</sup> that can be downloaded and printed to be turned into a local DHS office. OKDHS also provides a language line applicants can call for assistance.<sup>14</sup>

If applicants previously received benefits from OKDHS, they may apply online through OKDHS Live!<sup>15</sup> however, this option is not available for first-time applicants. Most states now utilize an online application system (44 states,<sup>16</sup> and while Oklahoma is included in this list, it does not utilize a comprehensive online application system). As noted above, OKDHS indicates that there will not be an update to the application system (to support online applications) for another five years due to budget constraints and lack of programming staff.<sup>17</sup>

If applicants are considered “non-emergency,” they will be interviewed within 20 days. The applicant must verify the following with a case manager at the DHS office:

1. Names and social security numbers for all household members
2. Income (both earned and unearned) of all household members
3. Shelter expense responsibility, such as rent or mortgage payments
4. Utility expense responsibility, such as electric, gas, water, and garbage, etc.
5. Out-of-pocket medical expense responsibility if there is a disabled member of the household or a member age 60 or over
6. Child support obligations
7. Child care expenses<sup>18</sup>



## SNAP EDUCATION

Supplemental Nutrition Assistance Program Nutrition Education (SNAP Ed) “provides nutrition education to food benefit recipients and other eligible low-income individuals and families.”<sup>19</sup> OKDHS manages SNAP Ed in Oklahoma, serving in an administrative and monitoring role.<sup>20</sup> The department submits the SNAP Ed plan to USDA-FNS, is responsible for ensuring the plan is implemented by providers, and submits performance reports.<sup>21</sup> The state operates on a budget of nearly \$10.8 million to implement SNAP Ed programming and covers a two-year period: October 1, 2015 thru September 30, 2017. The department works through four coordinating entities: Oklahoma State University Cooperative Extension Service, the Oklahoma Department of Human Services, Oklahoma University Health Science Center, and the Chickasaw Nation.<sup>22</sup> SNAP Ed is also available to individuals who participate in the Federal Distribution Program on Indian Reservations (FDPIR) since it serves as an alternative to SNAP.<sup>23</sup> The following program descriptions provide a snapshot of how SNAP Ed is being applied through the coordinating entities. These descriptions are excerpted from the 2015-2017 SNAP Ed Plan:

**FARM TO YOU** is a partnership between the implementing agencies of the Chickasaw Nation’s *Get Fresh* Program, University of Oklahoma Health Sciences’ *Oklahoma Nutrition Information & Education* (ONIE) Project, and Oklahoma State University’s *Oklahoma Nutrition Education* (ONE) Program. The program aims to meet the overarching Oklahoma SNAP goal of improving dietary quality within a limited budget and choosing physically active lifestyles consistent with the Dietary Guidelines for Americans and the USDA food guidance system in order to prevent obesity.<sup>24</sup> Additional partners to *Farm to You* include Southwest Dairy Farmers, Fresh Start Nutrition & You, the Oklahoma State University Nutritional Sciences department, Oklahoma State Department of Health, 4-H, and Oklahoma State University Extension. These partnerships allow for a multilevel approach within the school environment.<sup>26</sup>

**THE ONE PROGRAM** coordinates with local Department of Human Services offices, food pantries, congregate meal sites, faith-based organizations, low-income housing authorities, Head Start, Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Oklahoma Native American Food Distribution program sites, Oklahoma State Department of Education Child Nutrition Programs, local school districts, and other state and local agencies to recruit and deliver effective nutrition education to eligible individuals and families. In particular, the ONE Program has entered into a participant

referral project with clinics associated with the University of Oklahoma and Oklahoma State University Health Sciences Centers.<sup>25</sup>

### **THE CHICKASAW NATION’S GET FRESH!**

provides individual or group-based nutrition education, health promotion, and intervention strategies, focusing specifically on diabetes and obesity prevention. The program also offers cooking classes, physical activity education, grocery shopping strategies, and child-friendly educational materials and activities.

### **THE OKLAHOMA NUTRITION INFORMATION AND EDUCATION PROJECT (ONIE)**

aims to improve the health of Oklahoma families by offering various nutrition and physical activity programming, information, and education materials throughout the state. ONIE is a nonprofit organization created to support and strengthen the nutrition of Oklahomans.<sup>27</sup> More specifically, ONIE provides a cooking demonstration program, assists additional farmers’ markets to become SNAP-certified markets, organizes the Let’s Get Midwest City Moving Fun Walk and Run and Wellness Expo, provides after-school nutrition programming, and coordinates efforts to continue nutrition education efforts to the growing Hispanic population.<sup>28</sup>



**SNAP OUTREACH**

SNAP Outreach involves “providing information on eligibility and benefits to potentially eligible people with the goal of increasing participation.”<sup>29</sup> OKDHS partners with the Community Food Bank of Eastern Oklahoma (CFBEO) to provide food benefit outreach in 24 counties of eastern Oklahoma and the Regional Food Bank of Oklahoma to provide outreach to 32 counties in central and western Oklahoma.<sup>30</sup>

The CFBEO directly assists clients with completing and submitting SNAP applications and equips its partner agencies to assist clients. The Regional Food Bank of Oklahoma provides outreach through distribution of literature to low-income families it assists. OKDHS provides electronic benefit transfer (EBT) machines to EBT-vendor-approved farmers’ markets across the state and provides educational materials and posters to the farmers’ markets in order to offer more location choices for SNAP recipients to purchase locally grown and nutritious foods. OKDHS partners with the Kerr Center for Sustainable Agriculture to provide technical assistance at no cost to local farmers and ranchers. The Oklahoma Department of Agriculture assists farmers with applying to become a USDA vendor and assists with the purchase of point-of-sale machines. The department also partners with Chickasaw Nation to promote the senior nutrition program and to encourage Chickasaw Nation farmers to become approved as an EBT vendor. The state SNAP Outreach budget is \$2,740, plus an additional 50 percent federal match by USDA-FNS.<sup>31</sup> This is a comparatively low budget and implies there is much more the state can do around SNAP outreach.



**SNAP OUTREACH BUDGET FOR FEDERAL FISCAL YEAR 2015<sup>32</sup>**

<b>COMMUNITY FOOD BANK OF EASTERN OKLAHOMA</b>	<b>\$1,740</b>
<b>REGIONAL FOOD BANK OF OKLAHOMA</b>	<b>\$0</b>
<b>FARMER’S MARKET OUTREACH</b>	<b>\$1,000</b>
<b>TOTAL STATE OUTREACH BUDGET</b>	<b>\$2,740</b>
<b>FEDERAL MATCH OF 50%</b>	<b>\$1,370</b>

Figure 3. SNAP Outreach Budget for Federal Fiscal Year 2015

## SNAP PARTICIPATION TRENDS

### State-level Comparisons

The USDA publishes an annual series of reports on estimated SNAP eligibility and participation at the state level. These reports, titled “Reaching Those in Need: Estimates of state Supplemental Nutrition Assistance Program Participation Rates,” facilitate a comparison among states of the estimated share of eligible individuals that are participating in SNAP. In 2013, Oklahoma’s SNAP participation rate was 80 percent and ranked 39<sup>th</sup>,<sup>33</sup> a drop from 34<sup>th</sup> in 2012.<sup>34</sup> The figure below demonstrates the SNAP participation rates in Oklahoma in comparison with the U.S. and neighboring states. The SNAP participation rates have increased nationally and in most neighboring states; however, Oklahoma’s rate remained relatively stable.

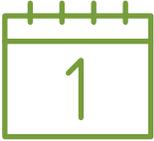
### SNAP PARTICIPATION RATES



Figure 4. SNAP participation has increased in the U.S. and most neighboring states while the Oklahoma rate has hardly fluctuated.

Data note: These state-level estimates are published annually by the USDA and use shrinkage estimation methods to enhance precision. The shrinkage estimator draws on data from the Current Population Survey, the American Community Survey, and administrative records. The most recent data at the time of publication was from 2013.

Additionally, a majority (71%) of the working poor, or individuals who participate in the labor force but have incomes below the poverty level, in Oklahoma participated in SNAP. Nationally, 74% of the working poor participated in SNAP.<sup>35</sup>



### ANNUAL AND MONTHLY PARTICIPATION

In 2015, a total of 868,000 individuals participated in SNAP in Oklahoma, which is a decrease from fiscal year 2014 (902,500 individuals).<sup>36</sup> In fiscal year 2014, the average monthly participation dropped from 624,567 in December 2013 to 598,483 in May 2014, which is likely due to the reinstated three-month time limit policy on able-bodied adults without dependents.<sup>38</sup> Though, it is important to note that Oklahoma has banned itself from the able-bodied adults without dependents waiver. The Center for Budget Policy Priorities asserts that, “while caseloads have been slowly declining (as is typical when unemployment falls) even before re-imposition of the time limit, the drop accelerated three months after the time limit returned” in December 2013.<sup>39</sup>

### COUNTY-LEVEL COMPARISONS

To estimate the number of individuals who are *income-eligible* for SNAP at the county level, we use American Community Survey 2015<sup>40</sup> estimates of the number of individuals in each county with incomes under 125 percent of the poverty level. Average monthly participation per county (from the Oklahoma Department of Human Services administrative records for fiscal year 2015)<sup>41</sup> was combined with the eligibility estimates to approximate the percentage of income-eligible individuals participating in SNAP at the county level per month. Figures 5 and 6 highlight the top 10 and bottom 10 counties in regards to SNAP participation rates.

**W**hile Oklahoma and Tulsa counties have the highest number of eligible individuals and the highest monthly average USDA value issued, their participation rates are below the state average (70.5% and 68.1%, respectively).<sup>42</sup>

## TOP 10 COUNTIES IN SNAP PARTICIPATION RATE FOR 2015

	SNAP Participation Rate	Total Individuals Below 125% Poverty	Average Monthly Participation	Monthly Average USDA Value
<b>BLAINE</b>	100.0	1,607	1,882	\$221,800
<b>HASKELL</b>	100.0	3,404	3,436	\$399,057
<b>ROGERS</b>	96.3	11,714	11,275	\$1,345,008
<b>POTTAWATOMIE</b>	95.2	15,829	15,066	\$1,800,039
<b>GREER</b>	93.7	1,061	994	\$ 111,451
<b>OKMULGEE</b>	93.6	10,232	9,579	\$1,140,366
<b>MCCLAIN</b>	92.8	5,416	5,028	\$601,796
<b>CHOCTAW</b>	91.7	4,943	4,533	\$533,944
<b>CREEK</b>	91.1	14,159	12,898	\$1,551,449
<b>ADAIR</b>	89.8	7,834	7,034	\$869,693

Figure 5. Top 10 Counties in SNAP Participation Rate for 2015.

Data note: Fiscal year 2015 average monthly participation and monthly average USDA value data came from the Oklahoma Department of Human Services. Data on total individuals comes from American Community Survey 2011-2015 alone (all individuals below 125 percent of the federal poverty level). Because county-level participation rates do not apply the shrinkage estimation methods, these estimates are useful primarily for county-to-county comparisons alone and for understanding an average month snapshot. In some instances, estimates may be inflated because the Census categorizes data at 125 percent and not at 130 percent, the income-eligibility threshold.

## BOTTOM 10 COUNTIES IN SNAP PARTICIPATION FOR 2015

	SNAP Participation Rate	Total Eligible Individuals	Average Monthly Participation	Monthly Average USDA Value
<b>CUSTER</b>	47.8	6,499	3,107	\$ 354,535
<b>CIMARRON</b>	47.8	559	267	\$ 24,640
<b>MAJOR</b>	45.3	1,289	584	\$ 63,993
<b>BEAVER</b>	42.9	823	353	\$ 39,532
<b>DEWEY</b>	40.4	961	388	\$ 43,137
<b>WOODS</b>	39.7	1,752	696	\$ 79,355
<b>HARPER</b>	35.9	676	243	\$ 24,439
<b>PAYNE</b>	35.0	22,125	7,752	\$ 876,858
<b>ROGER MILLS</b>	34.0	697	237	\$ 27,479
<b>ELLIS</b>	31.4	846	266	\$ 30,391

Figure 6. Bottom 10 Counties in SNAP Participation for 2015.

The state of Oklahoma experienced a drop in total dollars issued between 2014 and 2015, reflecting the drop in total individuals participating (-4.6 percent change in total USDA value issued between fiscal years 2014 and 2015, \$900.7 million and \$859.7 million, respectively). Notably, 68 counties experienced a decrease in issuance between both years. However, while Ellis, Roger Mills, and Custer counties have among the lowest SNAP participation rates (see Figure 6), they have each experienced a positive (and relatively high) percent change in total USDA value issued between 2014 and 2015 (48.4%, 9.1% and 11.7%, respectively), indicating growth in program participation.<sup>43</sup>

## // Race & Age

According to OKDHS, approximately 57 percent of SNAP participants in Oklahoma are White, 18 percent are Black, 13 percent are American Indian, 11 percent are Hispanic, and 2 percent are Asian. Other races, or mixed races, were not included in the data.<sup>44</sup> Additionally, 45 percent of SNAP participants in Oklahoma are children (17 and under).<sup>45</sup> Caseload data by age is not available at the county level.



**SNAP** is a particularly important safety net program that is intended to respond to economic downturns. Even with a relatively high SNAP participation rate (80%),<sup>46</sup> the accelerated dip in the number of individuals participating in SNAP between 2014 and 2015,<sup>47</sup> and the relatively consistent participation rate (which should increase during economic downturns) could potentially mean unreached need.

## // Women, Infants, and Children

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a federal food assistance program managed by the Food and Nutrition Service (FNS) of the USDA. WIC provides federal grants to states for supplemental foods, health care referrals, and nutrition education for low-income pregnant, breastfeeding, and non-breastfeeding postpartum women, and to infants and children up to age five who are found to be at nutritional risk.<sup>1</sup>

WIC offers tailored service packages based on the situation of the recipients. The packages for women are based on whether the individual is pregnant, postpartum, or the frequency of breastfeeding. For children up to the age of five, there is a set package allotted each month. These packages are based upon recommendations from the Dietary Guidelines for Americans and guidelines from the American Academy of Pediatrics and include a prescribed list of eligible products that provide supplemental, healthy foods, designed to meet the special nutritional needs of clients served. A breakdown of the available packages can be found at: <http://www.fns.usda.gov/wic/wic-food-packages-maximum-monthly-allowances>.

WIC also provides required nutrition education for its clients through online courses, group classes, and private consultations with Registered/Licensed Dietitians. WIC also provides breastfeeding education and support for new mothers. Nutrition and breastfeeding education classes are associated with many positive outcomes.





These outcomes include increased knowledge of nutrition by participants, better overall nutrition for the families of the participants, lower rates of childhood obesity amongst participants, and increased breastfeeding initiation rates. Supplemental infant formula is also available from WIC.<sup>2</sup>

The management of WIC in Oklahoma is unique—the Oklahoma State Department of Health (OSDH) and nine Indian Tribal Organizations (ITOs) are responsible for administering WIC services to residents and tribal citizens of Oklahoma. The ITOs act as government agencies and operate WIC offices. The state and ITOs work collaboratively and convene regular conferences to disseminate information and trainings.<sup>3</sup> In total, OSDH manages approximately 80 percent of WIC cases in the state, and ITOs the other 20 percent (based on the average monthly participation in 2015).<sup>4</sup>



## OSDH ADMINISTRATION OF WIC IN OKLAHOMA

Community and Family Health Services of OSDH manages the program. The WIC state leadership team consists of a state director, program operation director, nutrition director, program administration director, breastfeeding coordinator, and vendor coordinator. WIC clinics are predominantly run by the state. Currently, 76 Oklahoma counties have various clinics and vendors that provide WIC services and WIC approved foods. Oklahoma WIC clinics are located in several locations, including County Health Departments, rural hospitals, health centers, and nonprofit agencies. WIC representatives on location at each county clinic complete the approval process for services.<sup>5</sup>

The majority of WIC clinics are located in county health departments, and each county has a regional (county) director who oversees the services provided in all of the WIC clinics. Additionally, independent clinics provide WIC services through OSDH contracts. Each clinic contracts with the state WIC office for a one-year term with four additional year options available. Independent clinics make up 45 percent of their total WIC caseload for the state.<sup>6</sup> In total, there are 118 WIC clinics across the state. Approximately 25 percent of those are located in Oklahoma City and Tulsa.<sup>7</sup>

Food benefits are made available to clients through the use of Oklahoma's newly established Electronic Benefits Transfer, known as Oklahoma eWIC. Benefits are typically issued on these cards with three months of funding at a time, and the disbursement amount can vary based on issues with documentation or incomplete coursework with one month's funds at a minimum.<sup>8</sup>

In 2010, Oklahoma House Bill 2775 enabled the state to receive a contract to implement EBT. Planning and initial implementation for EBT began in 2012, with statewide completion in September 2016.<sup>9</sup> Prior to statewide implementation, clients were issued paper instruments in the form of checks. These checks led to an increased probability of clients redeeming ineligible WIC foods, as grocery store cashiers were ultimately responsible for deciding which food were allowed. Fortunately, with eWIC implementation, this probability has been significantly reduced.<sup>10</sup>

OSDH has published a list of approved items for purchase as a part of the program. These approved items are regulated by the federal government. Packages include a variety of foods such as whole grains, fruits and vegetables, juices, milk, and eggs. Oklahoma provides online nutrition education, interactive nutrition and fitness group classes, private consultations with registered/licensed dietitians, and a breastfeeding hotline.<sup>11</sup> According to a WIC employee, most of the nutrition classes are available to clients online.<sup>12</sup>

## WIC ELIGIBILITY & PARTICIPATION REQUIREMENTS

Eligibility is determined during individual’s initial WIC appointment at the local agency clinic. The USDA also offers an online screening tool to estimate eligibility. To participate in WIC, individuals must:

- + Be a child up to age five; a woman who is pregnant or postpartum (up to six months after the birth of the infant or the end of the pregnancy) or breastfeeding up to an infant’s first birthday; or an infant under 12 months old,
- + Have an income at or below 185 percent of the federal poverty level (see Figure 7 below),
- + Be a resident of the state where they apply, and
- + Be at nutritional risk as determined by a health professional or public health official. Nutrition risks include health problems that commonly result from poor nutrition, diet practices that do not meet current guidelines, and other uniform standards established by the National Institute of Health.<sup>13</sup>

## INCOME ELIGIBILITY OF QUALIFYING INDIVIDUALS

FAMILY SIZE	ANNUAL INCOME	MONTHLY INCOME	TWICE MONTHLY	BIWEEKLY	WEEKLY INCOME
1	\$21,978	\$1,832	\$916	\$846	\$423
2	\$29,637	\$2,470	\$1,235	\$1,140	\$570
3	\$37,296	\$3,108	\$1,554	\$1,435	\$718
4	\$44,955	\$3,747	\$1,874	\$1,730	\$865
5	\$52,614	\$4,385	\$2,193	\$2,024	\$1,012
6	\$60,273	\$5,023	\$2,512	\$2,319	\$1,160

Figure 7. Income Eligibility of Qualifying Individuals. These income amounts change annually.

## APPLICATION PROCESS

To apply for WIC, applicants must call a WIC clinic to schedule an appointment (although walk-ins may also be available). The person(s) receiving the benefits must attend the appointment and bring proof of ID, income, and address. The length of the certification period (typically between six months and one year) is based on whether the applicant is pregnant, postpartum, breastfeeding, an infant, or a child.<sup>14</sup> An applicant can usually apply and receive services in the same day.

## STATE-LEVEL COMPARISONS

Similar to SNAP caseload data, examining the number of individuals participating in WIC can be useful in terms of understanding longitudinal trends in participation over months and years, and this information is updated on USDA's website for the current fiscal year. However, this data does not demonstrate the extent to which the program is reaching those in need. Therefore, the USDA, in partnership with the Urban Institute, publishes annual reports on the national and state-level estimates of WIC coverage rates based on data from the state agency as well as the nine Indian Tribal Organizations (ITOs). The most recent figures come from 2013 fiscal year data and are published at the state and national levels. WIC coverage is defined as the percentage of WIC-eligible individuals participating in WIC. (In this report, coverage rate is synonymous with participation rate.)

Oklahoma's WIC coverage rate in 2013 was 53.9 percent, meaning approximately 54 percent of individuals who were eligible for WIC were actually participating in the program.<sup>15</sup> This rate fell short of the U.S. average of 60.2 percent (see Figure 8). Amongst neighboring states, Oklahoma's WIC coverage rate was the second lowest. By national comparison, the lowest WIC coverage rate was New Hampshire's at 41.5 percent, while the highest in the contiguous U.S. was California's at 76.1.<sup>16</sup> The Oklahoma WIC coverage rate has dropped since its peak in 2011 (62.9%), and has and continues to drop much more quickly than the national rate (see Figures 9 and 10).<sup>17</sup>

### WIC COVERAGE RATE BY STATE, 2013

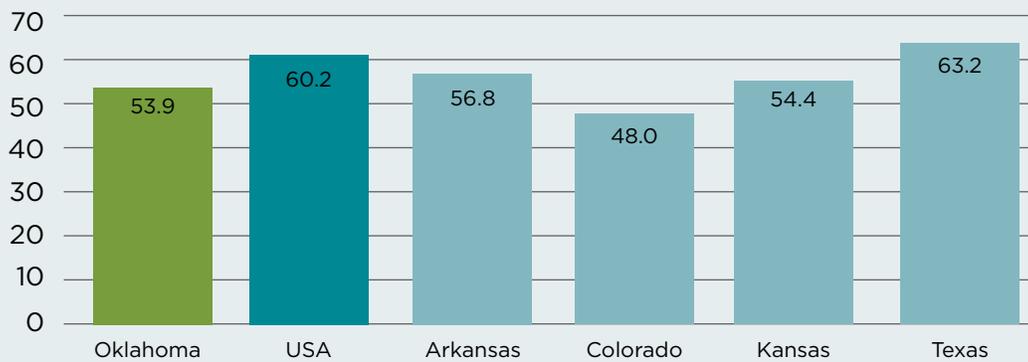


Figure 8. Oklahoma's WIC coverage rate lags behind the U.S. average and is the second worst rate among its neighboring states.

## WIC COVERAGE RATE BY STATE, 2008-2013

2008 2009 2010 2011 2012 2013

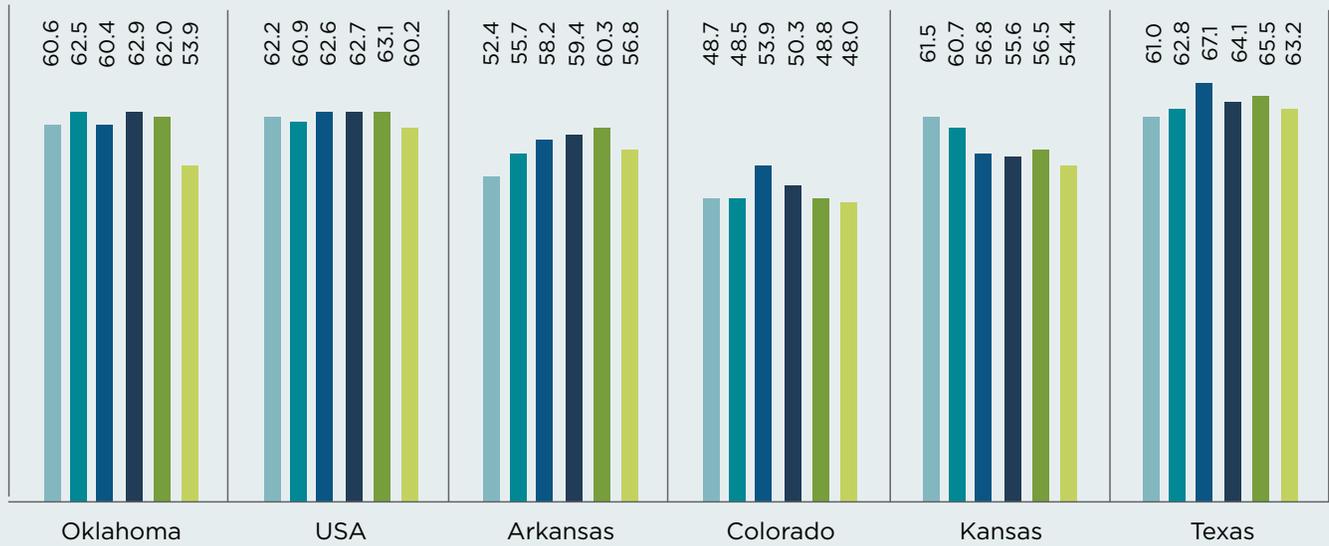


Figure 9. Oklahoma's WIC coverage rate has decreased since 2011 at much faster rate than the U.S. and neighboring states.

## WIC COVERAGE RATE, FYs 2008-2013

Oklahoma USA

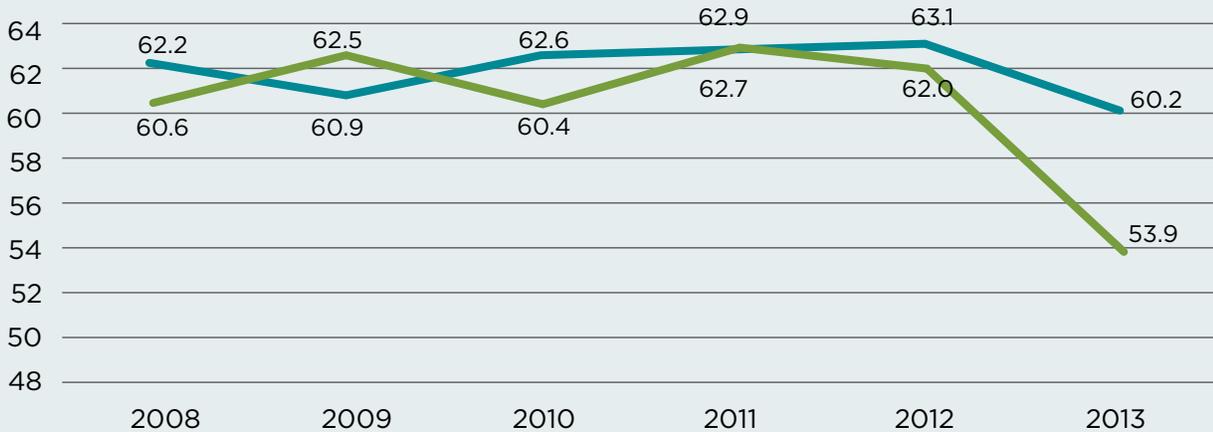


Figure 10. Oklahoma's WIC coverage rate has decreased since 2011 at much faster rate than the U.S.

WIC coverage data is further broken down at the state level by children and by women and infants combined. While Oklahoma has a relatively high coverage rate among women and infants (80.1%), it lags behind in participation among children (47.7%)<sup>18</sup> (see Figure 11 on the next page).

## WIC COVERAGE RATE BY PARTICIPANT TYPE, 2013

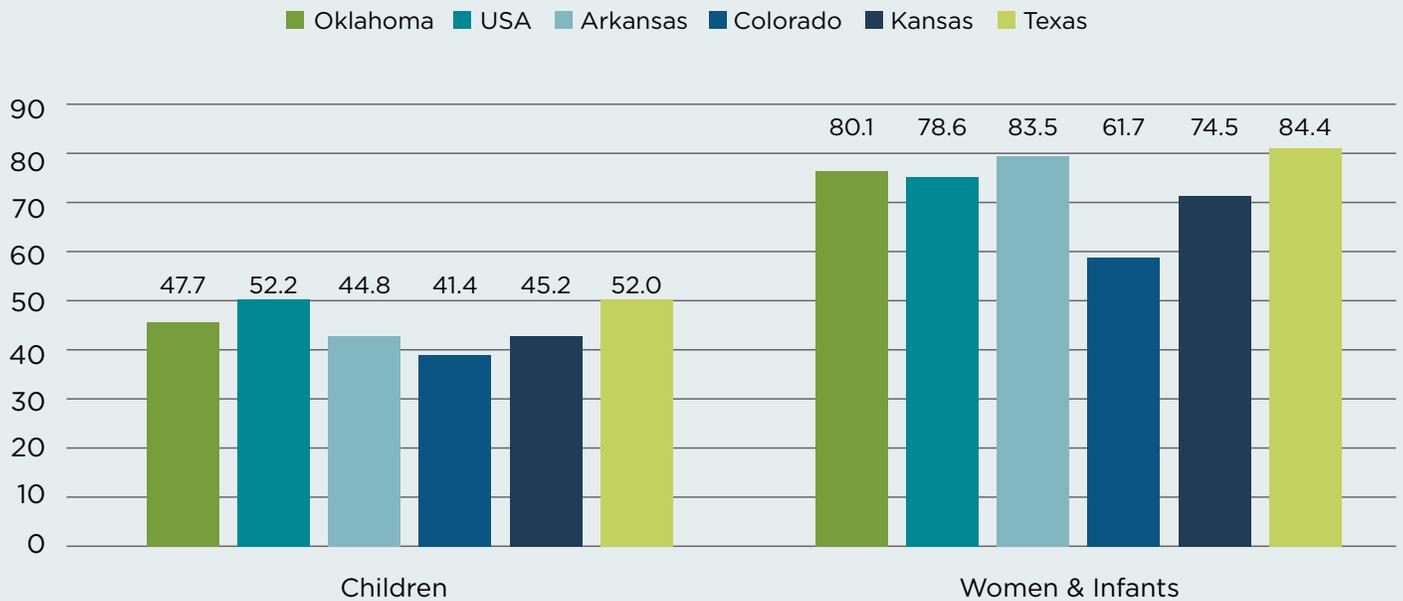


Figure 11. Oklahoma’s WIC coverage rate is lowest among children and highest among women and infants.

Data note: These state-level estimates are published annually by the USDA. The 2013 national estimates use the 2014 Current Population Survey, Annual Social and Economic Supplement (the CPS-ASEC, formerly referred to as the March supplement). The broken down category estimates are 3-year estimates and use the 2013 American Community Survey (ACS) and are converted to shares of the national estimates to produce state-specific eligibility estimates consistent with national totals. At time of publication, the most recent data was from 2013.

### ANNUAL AND MONTHLY PARTICIPATION

When it comes to understanding the nuance of changes in participation over time, drawing on caseload data that demonstrate the number of individuals participating is useful. In 2010, the average monthly participation in WIC was 105,104 (excluding ITOs). This number has dropped each year, and in 2015 that number fell to 86,496 (a decline of 18 percent since 2010).<sup>19</sup> The average monthly participation among ITOs has also declined from 2012 to 2015 (28,650 and 26,397, respectively).<sup>20</sup>

When broken down by women, infants, and children, each category of participant has seen a decline as well; in particular, participation among children declined by 20 percent (from 54,069 children in 2010 to 43,117 children in 2015).<sup>21</sup>

Notably, the number of infants enrolled in SoonerCare, Oklahoma’s Medicaid program, has increased (from 37,534 in 2007 to 40,225 in 2013).<sup>22</sup> CAPTulsa, an organization that provides early childhood education and family services, posits that the decrease in WIC participation among infants and children does not indicate a lack of need because of the increase in SoonerCare enrollment among infants. (With an increase among infant enrollment in SoonerCare, there is likely not a reduction in need for WIC since both programs cover similar populations, i.e. children living in households with incomes at 185 percent of the federal poverty level.<sup>23</sup>)

In an evaluation report produced by CAPTulsa, authors discuss how WIC participation may be related to state-level policy decisions and highlight the work of Bitler, Currie, and Sholz (2004)<sup>24</sup> to suggest that families are more likely to participate in WIC in states with higher Medicaid income limits, less frequent voucher distribution (quarterly rather than monthly), and adjunctive availability through Medicaid. CAPTulsa’s analysis indicates that:

“If these relationships hold true, Oklahoma policies would generally be expected to increase WIC participation. In Oklahoma, the food packages do not differ significantly from national norms, most clinics distribute vouchers quarterly, and Oklahoma offers adjunctive eligibility for SNAP participants... However, Oklahoma Medicaid income limits for adults are very low (although more typical for children), which would be expected to reduce WIC participation.”<sup>25</sup>



Oklahoma’s WIC program has experienced both growth and set-backs. With the implementation of the new electronic WIC cards, barriers to WIC redemptions have evidently been reduced. However, the WIC participation rate dropped at an alarming rate between 2012 and 2013.<sup>27</sup> The increased enrollment among infants in SoonerCare,<sup>28</sup> coupled with the decrease in number of individuals participating in WIC,<sup>29</sup> indicates unreached need throughout the state.

# Child Nutrition Programs

**T**he Oklahoma State Department of Education (OSDE) administers the child nutrition programs for the state. These programs include the National School Breakfast Program, the National School Lunch Program (which also includes afterschool snacks), the Child and Adult Care Food Program, and the Summer Food Service Program. The State Board of Education, comprised of seven members including the state superintendent, advises OSDE. The board has several partnerships with other government departments and outside agencies to administer services to the public and private sectors. One such partnership is with the Oklahoma Department of Human Services (OKDHS), which is responsible for facilitating nutrition services to private schools and residential child care institutions.



## **CHILD NUTRITION PROGRAM POLICIES**

Federal, state, and local policy impacts student eligibility and the structure and implementation of the child nutrition programs. Following is an overview of the legislation and policies that impact these programs in Oklahoma.

## **CHILD NUTRITION LAWS AS AMENDED BY THE HEALTHY, HUNGER-FREE KIDS ACT OF 2010**

Federal child nutrition laws as amended by the child nutrition laws authorize school meal and other child nutrition programs. These programs provide funding to ensure that children from low-income households have access to nutritious meals. Although permanently authorized, Congress must review the laws governing these programs every five years, which provides an opportunity to modify the programs. The statutes currently up for reauthorization impact several child nutrition programs, including the School Breakfast Program. The current law, the Healthy, Hunger-Free Kids Act of 2010, expired on September 30, 2015 and, as of January 1, 2017, has yet to be reauthorized.<sup>1</sup>

**“LOCAL WELLNESS POLICIES  
PROVIDE AN OPPORTUNITY  
FOR SCHOOL DISTRICTS TO  
BUILD A CULTURE OF HEALTH  
AMONG SCHOOLS BY CREATING  
AN INFRASTRUCTURE FOR  
PROMOTING HEALTHY EATING  
AND PHYSICAL ACTIVITY  
AMONG STUDENTS.”**

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## // Nutrition Guidelines

As part of the Let's Move! Campaign, and on the recommendation of the Institute of Medicine, Congress instituted new nutrition standards for school meals in 2015—the first update to meal requirements in 15 years. The new requirements are intended to improve the health and nutrition of students who participate in school meals throughout the year.

According to the USDA, the revised standards made the following changes:

- + Ensuring students are offered both fruits and vegetables every day of the week;
- + Substantially increasing offerings of whole grain-rich foods;
- + Offering only fat-free or low-fat milk varieties;
- + Limiting calories based on the age of children being served to ensure proper portion size; and
- + Increasing the focus on reducing the amounts of saturated fat, trans fats, and sodium.<sup>2</sup>



## // Local Wellness Policies

Local wellness policies provide an opportunity for school districts to build a culture of health among schools by creating an infrastructure for promoting healthy eating and physical activity among students. All school districts, also known as local education agencies (LEAs), that participate in federal child nutrition programs are required to establish a local school wellness policy for all schools under their jurisdictions. According to the USDA, “the Healthy, Hunger-Free Kids Act of 2010 added new provisions for local school wellness policies related to implementation, evaluation, and public reporting on progress of policies.”<sup>3</sup>

**T**hese new provisions were finalized on July 21, 2016, and “strengthen the requirements on public involvement, transparency, implementation, and evaluation.”<sup>4</sup>

By June 30, 2017, LEAs must comply with the requirements specified in the final rule, including, but not limited to:

- + Permitting parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, review, and update of the local wellness policy;
- + Identifying wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy; and
- + Informing and updating the public (including parents, students, and others in the community) about the content and implementation of the local wellness policy.

School districts must also ensure the wellness policy includes the required components:

- + Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals;
- + Nutrition guidelines for all foods and beverages available or for sale on the school campus during the school day that are consistent with federal regulations for school meal nutrition standards, and Smart Snacks in School nutrition standards.<sup>5</sup>

## // Eligibility Designations and Determination

### FREE AND REDUCED-PRICE ELIGIBILITY

A typical indicator of the number of students experiencing poverty or near-poverty (or of a severe-need school) is the number of students eligible for free or reduced-price school meals. Students eligible for reduced-price meals live in households with incomes between 130 and 185 percent of the federal poverty threshold, and students eligible for free meals live in households at or below 130 percent of the federal poverty threshold. Although this is not an exact measure of child poverty, it serves as a proxy to identify high-need schools that may be appropriate targets of intervention. The free and reduced-price eligibility guidelines for school year 2016-2017 (effective July 1, 2016 through June 30, 2017), per the USDA, can be found at: <https://www.gpo.gov/fdsys/pkg/FR-2016-03-23/pdf/2016-06463.pdf><sup>6</sup>

In order to qualify for reduced-price meals, an annual household income must be below the following amounts (to qualify for free meals, income levels are lower):

HOUSEHOLD SIZE	MAXIMUM INCOME LEVEL (PER YEAR)
1	\$21,978
2	\$29,637
3	\$37,296
4	\$44,955
5	\$52,614
6	\$60,273
7	\$67,951
8	\$75,647



Children participating in other federal assistance programs are categorically eligible for free school meals. This includes children in households participating in SNAP, Temporary Assistance for Needy Families (TANF) and FDPIR, as well as children who are homeless, migrant, in foster care, or enrolled in Head Start.

Applications for free and reduced-price meals vary by school and can sometimes be found on the school's website. Families must apply each school year, and only one application is necessary for each household.

In school year 2015-2016, 62.4 percent of Oklahoma students qualified for free or reduced-price meals. The percentage of students eligible for free or reduced-price meals has experienced a slight increase from 60.9 percent of students eligible in school year 2010-2011.<sup>7</sup> The number of students eligible for free and reduced-price meals at a school can help identify schools that could most benefit from improved participation in school meals. More students eating school meals can help lower the risk of food insecurity, and higher participation can result in increased revenue for school districts (schools are reimbursed for the meals they serve). Moreover, the Community Eligibility Provision (CEP) can increase the revenue schools receive and allows them to serve both breakfast and lunch free to all students. (More on CEP later in this section.)

### **SEVERE AND NON-SEVERE NEED**

Schools with a high population of low-income students may qualify for higher reimbursement rates for operating the federal child nutrition programs. More specifically, a school may be considered severe-need if "40 percent or more of the lunches served to students at that school in the second preceding school year were served free or at a reduced price." Additionally, even if school food authorities did not serve lunches in the second preceding year, they still may claim eligibility for severe-need reimbursements when approved by OSDE.<sup>8</sup>

## COMMUNITY ELIGIBILITY PROVISION

The Community Eligibility Provision (CEP), introduced by the Healthy Hunger-Free Kids Act of 2010, enables high-poverty schools to provide breakfast and lunch free to all students without the burden of meal applications. Instead, schools are reimbursed based on the number of identified students – those eligible for free school meals through direct certification because of their enrollment in other programs, including the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Head Start or in other low-income groups. The percentage of identified students is multiplied by 1.6 to determine the number of students reimbursed at the free rate, and the remaining number of meals are reimbursed at the paid rate. For schools that have 62.5 percent or more identified students, 100 percent of meals are reimbursed at the free rate.<sup>9</sup> The USDA provides a CEP calculator at: <http://www.fns.usda.gov/sites/default/files/cn/SP15-2013a2updated2.xls>.

This new formula simplifies and improves the reimbursement rates for high-poverty schools. Furthermore, it can result in increased revenue to buy equipment for nutrition programs, pay food service staff, and improve food quality – just as long as the funds stay within the nutrition department’s budget. The new claiming percentage is locked in for four years, but if a school’s number of identified students increases during this period it can recalculate its claiming percentage for an improved rate (i.e., greater reimbursement for the school). Additionally,



the new free claiming percentage is used to determine supplemental funds (like E-Rate and State Compensatory Education funding) for CEP schools.<sup>10</sup>

However, when adopting CEP, states can no longer rely on traditional free and reduced-price meal data when allocating Title 1 funds to CEP schools. Like most states, Oklahoma has created an alternative. OSDE directed districts to utilize their schools’ individual identified student percentages (ISPs) multiplied by 1.6 in lieu of free and reduced-price meal data. State aid in Oklahoma is apportioned to school districts according to a formula “based primarily on the number of students attending in each district and is weighted based on various student characteristics, including free and reduced-price meal percentages.”<sup>11</sup> While Oklahoma districts electing CEP may report their individual schools’ ISP multiplied by 1.6 in lieu of free and reduced-price meal data, according to FRAC, “it has not been put into an official policy memo or communicated in writing to schools interested in participating in CEP, creating uncertainty and confusion among districts.”<sup>12</sup>

There are a variety of configurations that can allow a public, private, or charter school to participate in CEP. Although “a minimum ISP of 40 percent is required in order to participate in CEP, that ISP may apply to a single school, an entire district, or a group of schools within a district, depending on what configuration makes the most sense for that district.”<sup>13,14</sup> A complete list of eligible schools and a step-by-step guide can be found on the OSDE Child Nutrition Programs website.<sup>15</sup>

Calculating CEP uptake can be challenging, because Oklahoma submitted proxy data to the USDA. Therefore, it is difficult to accurately interpret free and reduced-price eligibility data or to determine the number of schools and districts that have newly implemented CEP. However, the Oklahoma Policy Institute uses OSDE's rough estimates for schools and districts that are CEP-eligible:<sup>16</sup> 351 districts, including 848 schools are eligible to elect the CEP, with a total of 297,761 potentially affected students.<sup>17</sup>

According to the Food Research and Action Center's (FRAC) and the Center on Budget and Policy Priorities recent CEP report,<sup>18</sup> only 15 percent of eligible Oklahoma school districts adopted CEP in school year 2015-2016 – this is the fifth worst in the nation. Additionally, only 21 percent of eligible school campuses (184 of 864) adopted CEP in school year 2015-2016 – the eighth worst in the nation. Of the 227 highest poverty schools, only 48 (21%) adopted CEP in school year 2015-2016 – the fourth worst in the nation. (These statistics do not include Tulsa schools or other areas implementing CEP during the fall of 2016.) It is important to note that, anecdotally, there is indication of growing CEP uptake across the state in fiscal year 2017. Because CEP can occur in a variety of configurations, it is useful to provide a bit more

nuance to these numbers. As of April 2016, 546 LEAs had at least one CEP-eligible school. 167 LEAs were eligible to participate in CEP, but only 54 of them were participating (eligibility = 40% ISP which is different than FRP). These 54 districts include 180 schools/campuses and 65,539 total students. Thirty-five districts were participating in CEP districtwide.<sup>19</sup> Further, 218 campuses have moved to a four-day school week for 2016-17,<sup>20</sup> and an estimated 122 of them are CEP-eligible.<sup>21</sup> That means approximately 28,000 students are in four-day week schools that are eligible to participate in CEP.<sup>22</sup>

There are some misconceptions of CEP in Oklahoma. Some have suggested that OSDE should make a statement to schools across the state explaining that funding for CEP does not affect teacher funding. In order to address these concerns, OSDE is drafting an official policy to provide clarification about reporting low-income students without free-and-reduced applications and state aid calculations for schools implementing CEP. Oklahoma Policy Institute is an advocate for CEP and has written extensively on the benefits of the provision.<sup>24</sup> Information and resources are also provided by the USDA,<sup>25</sup> the Center on Budget and Policy Priorities,<sup>26</sup> Share Our Strength<sup>27</sup> and FRAC.<sup>28</sup>

### PERCENTAGE OF DISTRICTS AND CAMPUSES PARTICIPATING IN COMMUNITY ELIGIBILITY PROVISION, 2015-2016

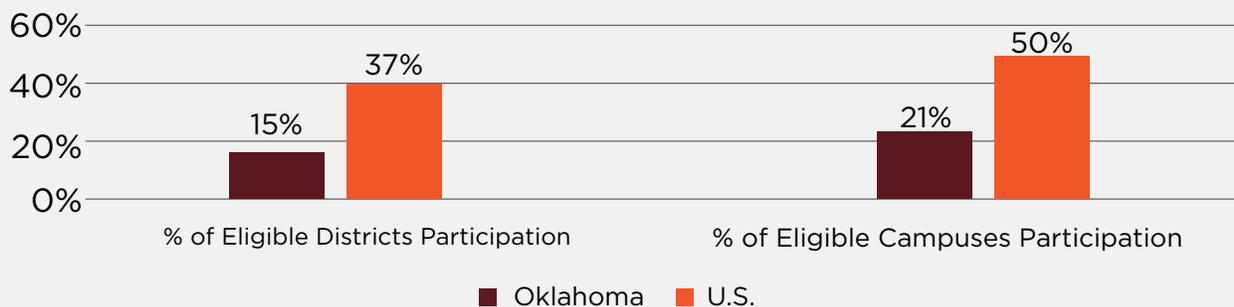


Figure 15. Oklahoma lags behind in the national average CEP participation at the district and campus levels.

“Studies show that eating school breakfast can improve attendance, decrease tardiness and lead to fewer visits to the school nurse, among other benefits.”

### **NATIONAL SCHOOL BREAKFAST PROGRAM**

The National School Breakfast Program was established in 1966 and received permanent authorization in 1975. The program aims to make breakfast available in schools for students who do not have regular access to an adequate breakfast. Any public or private nonprofit school or licensed residential child care institution is eligible to implement the program. School districts and residential child care institutions may receive reimbursement for breakfasts served at the free, reduced-price or paid rate each fiscal year. A school adopting CEP, however, must offer free breakfast and lunch to all students. Federal reimbursements are to be used to continue or improve the school’s nutrition programs. Eating school breakfast can result in multiple benefits to students, educators, and schools. Studies show that eating school breakfast can improve attendance, boost academic achievement, decrease tardiness, and lead to fewer visits to the school nurse, among other benefits.<sup>29</sup>



## BREAKFAST SERVICE MODELS

Universal School Breakfast (USB) is one way to improve participation in school breakfast.<sup>30</sup> Serving breakfast free to all students can reduce stigma typically associated with eating breakfast at school. Especially in younger grades, normalizing eating school breakfast can lead to greater participation in the program, but large schools and early start times can make it difficult for schools to ensure that all students have the opportunity to eat breakfast. Offering breakfast free to all students and after the start of the school day are the most effective strategies for overcoming these barriers.

In Oklahoma, there is no state legislation mandating the implementation of Universal School Breakfast (USB) or alternative breakfast service models. Also, there is no additional state funding to increase the reimbursement schools receive for serving meals.

The two most common alternative service models are Breakfast in the Classroom and Grab and Go. However, there are currently six types of service models that are commonly used and can be customized to fit a school's needs.<sup>31</sup>



### TRADITIONAL BREAKFAST

A large cafeteria or low student enrollment can allow breakfast in the cafeteria to be successful, but it is important that students arrive at school with enough time to eat. Offering breakfast free to all students can also aid participation in traditional breakfast.

### BREAKFAST IN THE CLASSROOM

One of the most popular alternative models, breakfast is brought into the classroom to ensure that all students have the opportunity to eat. There are many customizable options to tailor this model to individual campuses.

### GRAB AND GO

This model is usually offered to older students that can carry their meals from a cart or kiosk. Some schools provide meals pre-assembled and others offer individual items for students to choose from.

### BREAKFAST ON THE BUS

For schools with a long commute, this model serves students during the bus ride before they arrive to school. Breakfasts are stored in cooled or heated containers and picked up by students as they enter the bus.

### SECOND CHANCE BREAKFAST

Sometimes older students are not hungry when they first arrive at school. This model allows students to get breakfast when they are hungry, usually after first or second period. Meals are usually served via kiosk or cart.

### BREAKFAST VENDING MACHINES

Especially popular in high schools, vending machines are a convenient method for serving breakfast. Students enter an ID or PIN number to retrieve the meal, and the machine tracks the meals served.



## PARTICIPATION

According to the latest FRAC School Breakfast Scorecard, only 58.5 Oklahoma students received free or reduced-price school breakfast for every 100 who participated in school lunch in school year 2014-2015. (183,701 Oklahoma students participated in free and reduced-price school breakfast each day and 314,243 students participated in free or reduced-price school lunch each day.) This ranks Oklahoma 13<sup>th</sup> among states in breakfast participation, falling from a rank of 12 the previous year.<sup>32</sup>

This ratio is used by several state and national advocacy organizations, including FRAC and Share Our Strength, to determine participation in school breakfast as compared



to school lunch. These organizations also suggest a participation goal of 70 percent statewide. If Oklahoma reached the benchmark of serving 70 students free or reduced-price breakfast for every 100 receiving free or reduced-price lunch, the state could secure \$9.5 million in additional federal funding that would be used to strengthen its child nutrition programs.<sup>33</sup>

### FREE AND REDUCED-PRICE STUDENTS PARTICIPATING IN SCHOOL BREAKFAST PER 100 PARTICIPATING IN SCHOOL LUNCH, FYS 2009-2015

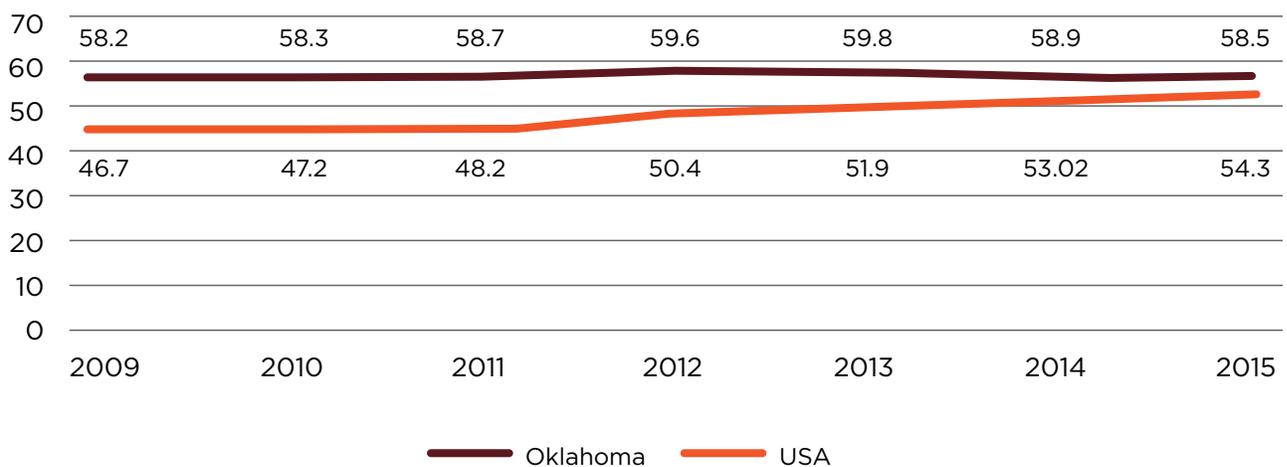


Figure 16. Over the 2009-2015 period, Oklahoma's breakfast participation ratio has consistently been higher than the national average; however, Oklahoma experienced a slight decrease in 2015.<sup>34</sup>







Oklahoma has the second lowest school breakfast participation rate among the five states in this comparison. Most notably, in 2013-2014, Oklahoma experienced a .9 percent decrease in participation while Colorado, Arkansas, Kansas, and Texas experienced increases ranging from 1.3 percent to 9.9 percent.<sup>35</sup>

### STUDENTS PARTICIPATING IN SCHOOL BREAKFAST PER 100 PARTICIPATING IN SCHOOL LUNCH, FYs 2009-2015

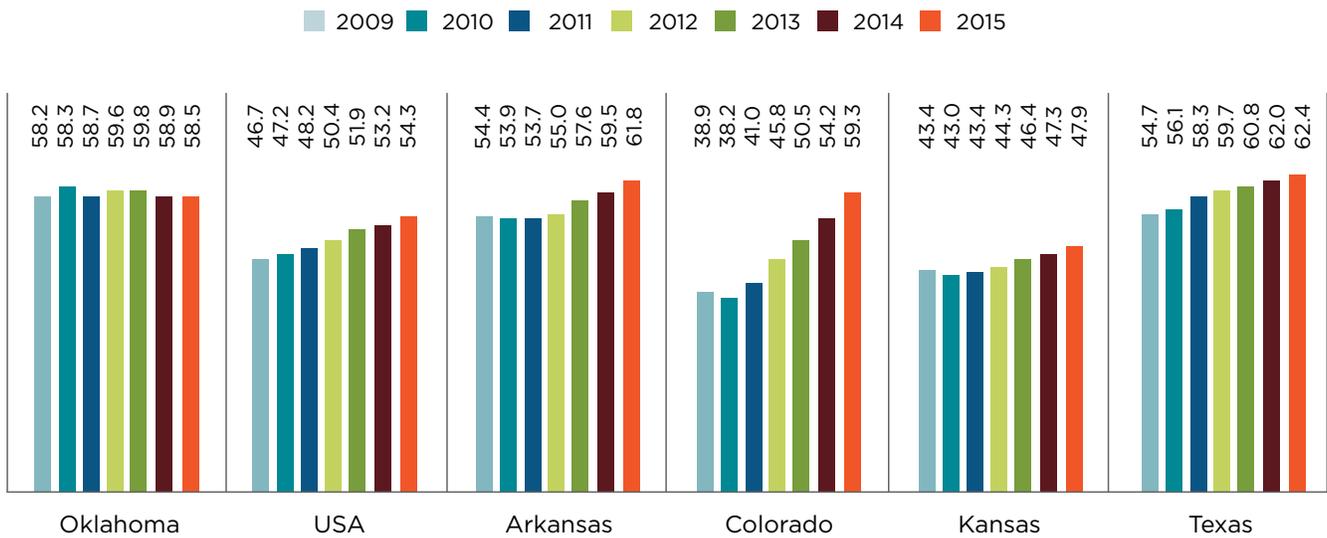


Figure 17. While Oklahoma's breakfast participation ratio is higher than the U.S., it lags behind comparison states, including Arkansas, Colorado, and Texas.<sup>34</sup>

## // National School Lunch Program

The National School Lunch Act, passed in 1946, established school lunch programs across the nation. The purpose of the program was to safeguard the health and well-being of the nation's children and to encourage the consumption of agricultural abundance.

The National School Lunch Program (NSLP) is available to any public or private nonprofit school or licensed residential child care institution. The objectives of the National School Lunch Program are to

- + make available to all students enrolled in schools and institutions a meal during a period designated as the lunch period;
- + provide nutritionally adequate meals that are acceptable to students, thus reducing plate waste;
- + provide assistance to participants to ensure that minimum meal requirements are met; and
- + to ensure that all programs are accountable.

School districts and residential child care institutions may receive reimbursement for lunches served to enrolled students at predetermined rates established for free, reduced-price, or full-price meals each fiscal year.<sup>1</sup>

For both School Breakfast and School Lunch, school districts must follow nutritional guidelines for meals served, as identified by USDA. Other school meal regulations and requirements can be found on the OSDE Child Nutrition Department website.<sup>2</sup>

### AFTERSCHOOL SNACK PROGRAM

The Afterschool Snack Program is a component of the National School Lunch Program which facilitates the delivery of snacks to children who participate in afterschool activities in order to promote the health and well-being of children. To be eligible to provide afterschool snacks through NSLP, a school must "provide children with regularly scheduled activities in an organized, structured, and supervised environment, [and] include educational or enrichment activities (e.g., mentoring or tutoring programs)." Competitive interscholastic sports teams are not an eligible afterschool program.<sup>3</sup>

Afterschool programs qualify to participate in the Afterschool Snack Program by school attendance area:

"A qualifying afterschool program located in an attendance area of a school site in which at least 50 percent of the enrolled students are certified for free or reduced-price meals (the same enrollment for school lunch) may receive reimbursement for snacks served to students at the free rate. A qualifying afterschool program located in an attendance area that does not meet the 50 percent free and reduced-price criteria may receive reimbursement for snacks served to students at the free, reduced-price, or full-price rates established each new fiscal year."<sup>4</sup>

Schools participating in the Afterschool Snack Program may claim reimbursement for one snack per child per day for participating children enrolled in public school. Just as school breakfasts and lunches must meet nutrition component guidelines, afterschool snacks must contain at least two different components of the following four items: a serving of fat-free (unflavored or flavored) or low-fat fluid milk (unflavored); a serving of meat or meat alternate; a serving of vegetable(s) or fruit(s) or full strength vegetable or fruit juice; a serving of whole grain or enriched bread or cereal.<sup>5</sup> Qualifying afterschool programs interested in applying can contact the school food service director in their school district or OSDE for more information.<sup>6</sup>



## // Child and Adult Care Food Program

The Child and Adult Care Food Program (CACFP) provides nutritious meals and commodities to child and adult care institutions and family or group day care homes. More specifically, it is available to public and private nonprofit organizations providing licensed, non-residential day care services. Such organizations include Head Start Centers, child care centers, Family Day Care Home (FDCH) Sponsors, outside-school-hours care centers, organizations providing day care services for children with disabilities and/or special health care needs, and adult care centers. Also, private for-profit centers may qualify if they receive compensation under Title XX/XIX of the Social Security Act for at least 25 percent of the participants who are receiving non-residential care or 25 percent of their participants qualify for free or reduced-price meal benefits.<sup>7,8</sup>

CACFP offers two types of assistance: cash reimbursement for meals or snacks and USDA commodities made available by OKDHS. While the rules vary by type of provider, for most providers CACFP reimburses up to two meals and a snack per day per person. The supper or snack must meet nutrition guidelines and meal patterns.<sup>9</sup>

### “AT-RISK” AFTERSCHOOL MEALS

Similar to the NSLP Afterschool Snacks program, the CACFP has an At-Risk component which allows afterschool programs to offer a meal and/or snack to children in low-income areas. CACFP At-Risk implementation across all states is relatively recent – the Healthy, Hunger-Free Kids Act expanded the program’s availability,<sup>10</sup> and OSDE staff indicate that there has been recent growth in the program in fiscal year 2016. This program differs from the NSLP Afterschool Snacks Program by enabling afterschool programs to offer suppers as well as snacks, which can be served after school, on weekends, and during school holidays. Meals in the At-Risk component include more nutritional components and receive a higher reimbursement rate than snacks, which can be an appealing financial factor for sponsors. At the free reimbursement rate for 2015-2016, sponsors receive \$0.84 for snacks (or supplements)<sup>11</sup> for both NSLP snacks and CACFP snacks and \$3.07 for lunch or supper.<sup>12</sup>

Organizations may participate in the At-Risk Afterschool Meals component of CACFP as an independent afterschool program or through a sponsor. Notably, the meal program does not have to be at a school – it can be another qualifying organization in the community, like a congregation, YMCA, or Boys and Girls Club. To be eligible to participate in the At-Risk Afterschool Meals component of CACFP either independently or through a sponsor, an afterschool program must:

- + Be organized primarily to provide care for children after school or on the weekends, holidays, or school vacations during the regular school year (an At-Risk Afterschool center may not claim meals or snacks during the summer, unless it is located in the attendance area of a school operating on a year-round calendar);
- + Provide organized, regularly-scheduled activities in a structured and supervised environment;
- + Include education or enrichment activities; and
- + Be located in an eligible area.

Educational and enrichment activities include, but are not limited to, arts and crafts, homework assistance, life skills, remedial education, organized fitness activities, etc. While required to offer activities, there is no requirement that all children receiving meals participate in the activities.<sup>13</sup>

## **PARTICIPATION**

Advocates promote serving meals over snacks since meals provide more substance and nutrition, and the reimbursement rate is higher. According to FRAC, all qualifying Oklahoma schools could be providing a meal instead of a snack. While afterschool snacks are available through both NSLP Afterschool Snacks and CACFP, afterschool meals are only available through CACFP. With multiple programs to manage, adding CACFP can create additional and duplicative administrative work for schools, which discourages them from participating. To overcome this barrier, USDA has given state agencies the authority to make it easier for schools to provide afterschool meals by streamlining the application process and some of the program requirements. This eases much of the paperwork and administrative burden of operating an additional child nutrition program. States that have taken these steps and have promoted the option, have increased the number of schools offering afterschool meals. *In addition to providing meals after school, schools can provide meals at weekend programming, making this an especially important resource for the Oklahoma schools that operate a four-day school week.*<sup>14</sup>



**ALL OKLAHOMA SCHOOLS  
COULD BE PROVIDING A  
MEAL INSTEAD OF A SNACK.**

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According to the Afterschool Alliance, a group committed to raising awareness and expanding resources for afterschool programs, an average of 68,751 students participate in an afterschool program in Oklahoma.<sup>15</sup>

Approximately 32.1 percent of students that participated in an afterschool program received a snack or supper in school year 2014-2015 (average daily participation was 22,039).<sup>16</sup> Oklahoma has the lowest afterschool meal participation rate amongst the five states in this comparison (see Figure 19). The highest participation rates are in Arkansas where 74 percent of students in an afterschool program are receiving a snack or meal. Texas also has a higher participation rate than the other states (39.8%). Kansas and Colorado both have participation similar to Oklahoma – 26.1 percent and 16.4 percent, respectively.<sup>17</sup> (A total of 3,058,662 snacks—NSLP and CACFP At-Risk snacks—and 195,748 suppers were served in 2014-2015.<sup>18</sup> Suppers currently make up six percent of food served after school, which is the lowest in comparison to neighboring states.<sup>19</sup>)

### PERCENT OF STUDENTS IN AN AFTERSCHOOL PROGRAM THAT ARE RECEIVING A SNACK OR MEAL IN OKLAHOMA, FY 2015

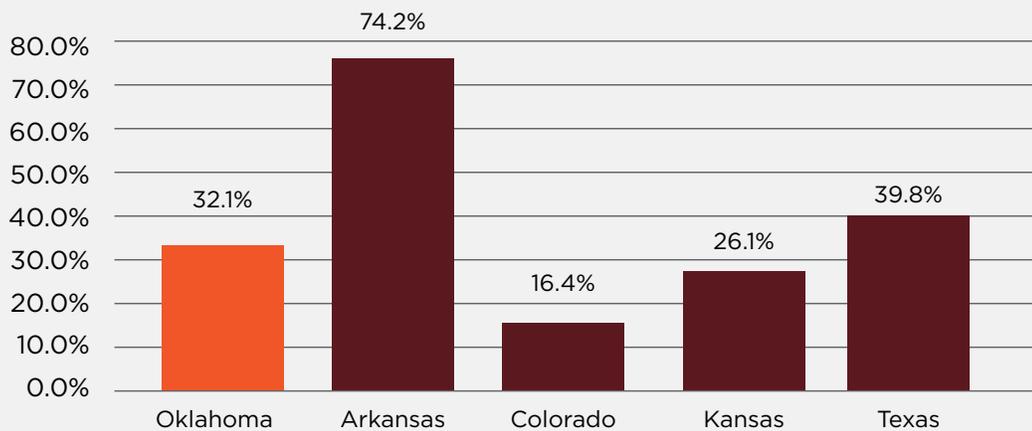


Figure 18. Roughly a third of the students in Oklahoma afterschool programs receive a snack or meal, which is less than Arkansas and Texas and more than Colorado and Kansas.

### SHARE OF AFTERSCHOOL MEALS\* THAT ARE SUPPERS, FY 2015

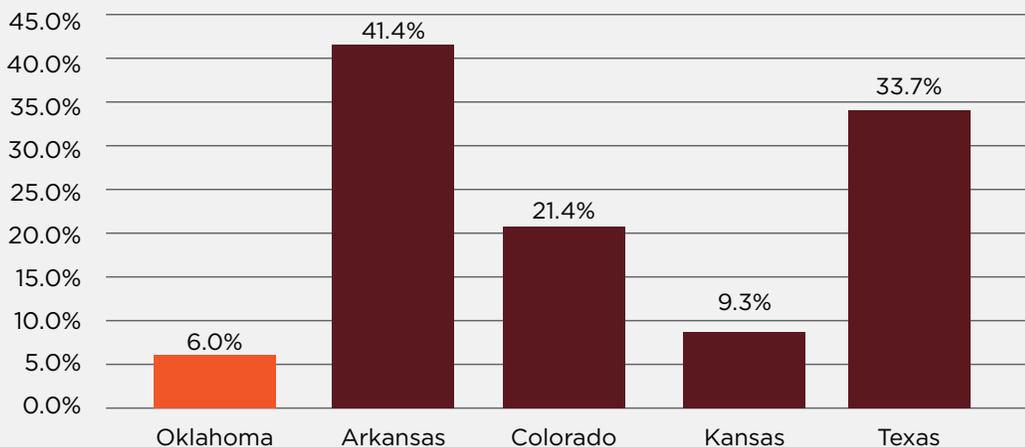


Figure 19. Oklahoma serves a smaller proportion of afterschool suppers than comparison states. \*In this case, "meals" is inclusive of snacks and suppers.

# Summer Meals Program

**T**he Summer Meals Program provides free meals to children and teens 18 and under during the summer months. The Summer Meals Program includes two administrative options: the Seamless Summer Option (SSO) and the Summer Food Service Program (SFSP). Under both administrative options, the program requires the collaboration of state agencies, sponsors, and sites. The state agency contracts with a sponsor, which is in charge of recruiting, training, and monitoring sites. The sponsor may serve as either a self-prep sponsor or a vended sponsor. The self-prep sponsor prepares food on location, either purchasing through a local grocer or food provider. A vended sponsor contracts directly with a food provider or vendor that prepares the food and delivers the food either to the sponsor or directly to the sites.<sup>1</sup>

Organizations that can serve as sponsors include:

- + A public school food authority,
- + A public or nonprofit private residential summer camp,
- + Units of a local, city, county, tribal, or state government,
- + A public or private nonprofit college or university that participates in the National Youth Sports Program, or
- + A private, nonprofit 501(c)(3) organization.<sup>2</sup>

## **SEAMLESS SUMMER OPTION**

Schools can apply to operate the Seamless Summer Option (SSO) through the National School Lunch (NSLP) or School Breakfast Programs (SBP) and continue the same meal service rules and claiming procedures used during the regular school year. Although the traditional Summer Food Service Program is still available to schools, the Seamless Summer Option offers a streamlined approach to feeding children in the community. Learn more at: <http://www.fns.usda.gov/sfsp/summer-food-service-program-sfsp>.

**S**chool districts, also known as School Food Authorities (SFAs), participating in the NSLP or SBP are eligible to apply for the Seamless Summer Option. Once approved through their governing state agency, SFAs serve meals free of charge to children, 18 years and under, from low-income areas.

The types of sites allowed to participate in the SSO option include:

- + Open sites: all children eat free in communities where at least 50 percent of the children are eligible for free or reduced-price school meals.
- + Restricted open sites: sites that meet the open site criteria but are later restricted for safety, control, or security reasons.
- + Closed enrolled sites: may be in any community for an enrolled group of low-income children and meets the 50 percent criteria explained above. This excludes academic summer schools.
- + Migrant sites: serving children of migrant families.
- + Camps: residential or non-residential camps.

The same NSLP and SBP rules apply for meal service. Meals served are reimbursed at the NSLP and/or SBP free rates.

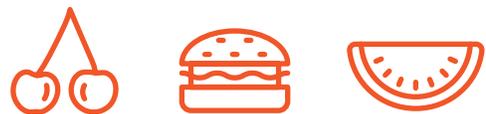


### **SUMMER FOOD SERVICE PROGRAM (SFSP)**

The Summer Food Service Program (SFSP) is the second administrative option for community organizations, congregations, government entities, and even schools. There are three common types of sites: open, camps (residential and nonresidential), and closed enrolled sites.

According to OSDE's website, in order to become a sponsor:

- + Contact the Oklahoma State Department of Education Child Nutrition Programs' (OSDE CNP) office at 405-521-3327 and speak with the Summer Food Service Program Coordinator,
- + Attend a state-mandated Summer Food Service Program training, and
- + Ensure that sites are located in an area in which at least 50 percent of students qualify for free or reduced-price lunches. A local school district or the OSDE-CNP office can help with this.<sup>3</sup>



## ELIGIBILITY

In order for a program to offer meals through the CACFP, SFSP, and SSO options, it must meet area eligibility requirements typically based on free and reduced-price eligibility data in local school zones (e.g., if 50 percent or more of the students in the attendance area of a meal site are certified to receive free or reduced-cost meals). Because the identified student percentage multiplied by 1.6 is intended to approximate the free and reduced-price percentage, USDA indicates that districts rank their sites that use area eligibility by the individual sites' ISP multiplied by 1.6.<sup>4</sup>

Many sponsors choose to serve meals and/or snacks both during the summer and academic school year. There are a variety of benefits when organizations and schools choose to serve year-round by participating in both At-Risk Afterschool Meals and SFSP:<sup>5</sup>

“Organizations benefit from having the ability to hire year-round staff, a continuous flow of reimbursements providing additional financial stability, and recognition in the community as a stable source of services. Communities benefit by having a partner that provides year-round nutrition services for children and brings increased federal funds into the local economy.”<sup>6</sup>

## PARTICIPATION

In 2015, for every 100 students who participated in FRP school lunch, 6.4 participated in the Summer Meals Program, ranking Oklahoma 51<sup>st</sup> in the nation for summer meals participation. In fact, Oklahoma is 1 of 11 states that fed summer meals to fewer than one in 10 of their low-income children in July 2015 (18,730 Oklahoma students participated in the Summer Meals Program).<sup>7</sup> There are various barriers to summer meal participation including number of sites, lack of transportation, safety concerns, stigma, and weather, among others, and addressing each barrier is important when seeking to increase participation in the program.

Currently, advocacy organizations, including FRAC and Share our Strength, suggest a statewide participation goal of 40 percent. If Oklahoma reached the benchmark of serving 40 students summer meals for every 100 receiving free or reduced-price lunch during the school year, the state could secure \$7.8 million and feed on average 99,000 more children per summer.

Summer meals participation in Oklahoma dropped by 5.5 percent from 2014 to 2015, to rank 51<sup>st</sup> in the nation. However, notably, Oklahoma was not the only state that saw decreases in participation rates. Arkansas saw a decrease of 32.3 percent and dropped 20 spots from 6<sup>th</sup> highest participation rates to 26<sup>th</sup>. Texas saw a notable decrease in participation – down 10.3 percent from the previous year. Colorado, which also ranks towards the bottom of the list at 43<sup>rd</sup>, saw no growth or reduction in participation while Kansas increased participation by 17.3 percent.<sup>8</sup> Participation is contingent upon the availability and accessibility of sites. In 2015, there were a total 174 summer meals sponsors and 659 sites across Oklahoma.<sup>9</sup>

### STUDENTS ELIGIBLE FOR FREE AND REDUCED-PRICE MEALS PARTICIPATING IN SUMMER MEAL PROGRAMS PER 100 PARTICIPATING IN FREE AND REDUCED-PRICE LUNCH, FYS 2006-2015

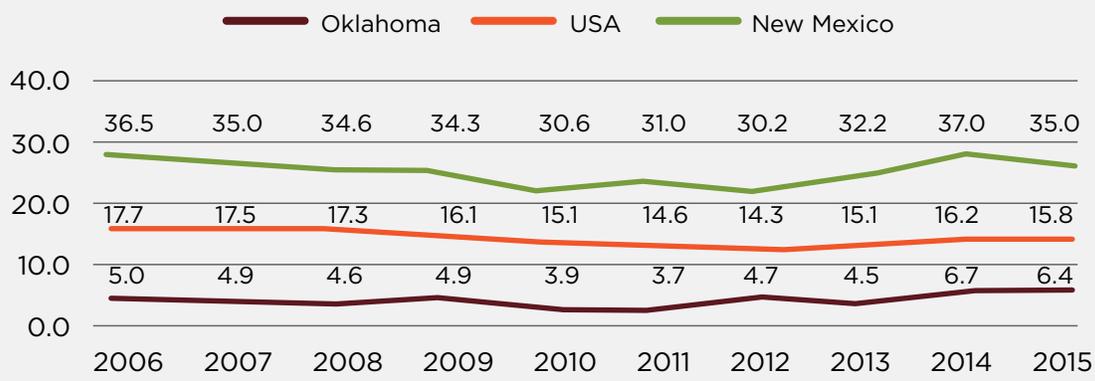


Figure 20. Oklahoma's summer meal's participation rate has consistently been below the national average.

### STUDENTS PARTICIPATING IN FREE AND REDUCED-PRICE SUMMER MEAL PROGRAMS PER 100 PARTICIPATING IN SCHOOL LUNCH, FYS 2006-2015

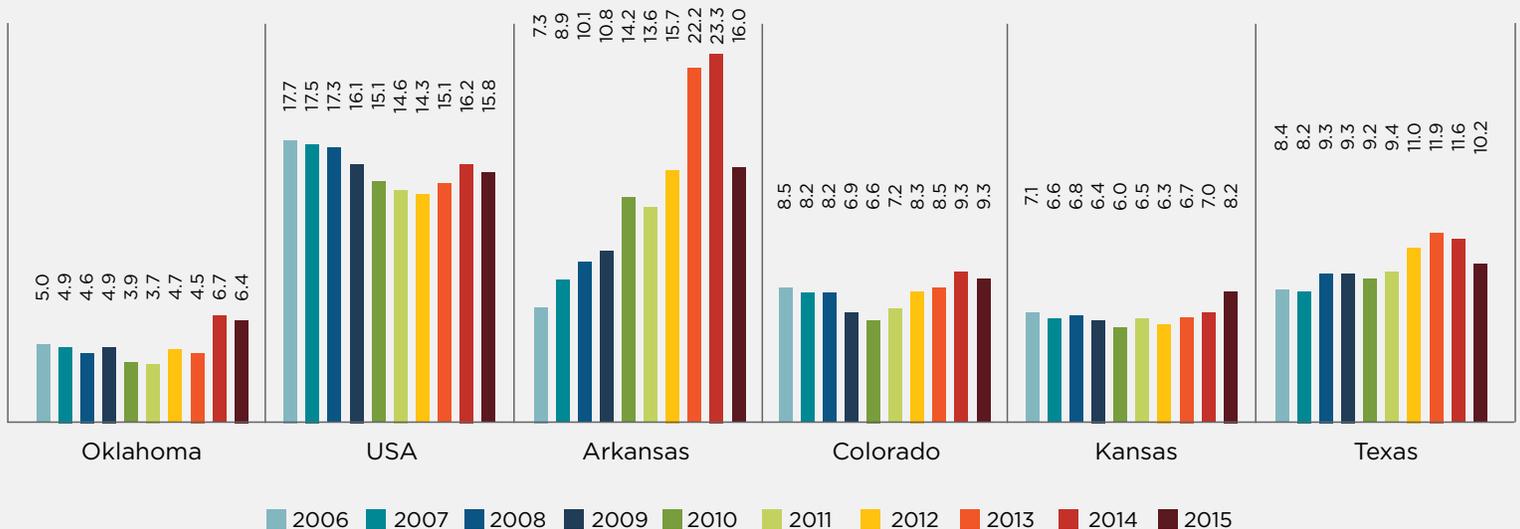


Figure 21. Oklahoma's summer meal's participation rate has consistently been below the levels of neighboring states.

# Food Distribution Programs

## // Food Distribution Program on Indian Reservations

**T**he Food Distribution Program on Indian Reservations (FDPIR or FDP) provides USDA Foods to tribal citizens. The program was created to address food insecurity for households living on reservations or American-Indian households living in approved service areas. Indian Tribal Organizations (ITOs) manage FDPIR, but only one of them (Osage Nation) is a reservation. The other tribes in Oklahoma have tribal jurisdiction areas, where they serve their tribal citizen population across multiple counties.<sup>1</sup> Due to these tribal jurisdiction areas, FDPIR benefits many tribal citizens that do not live on traditional tribal reservations. Therefore, FDPIR may also be called “FDP” by tribal nations that have tribal jurisdiction areas. There are 16 ITOs in Oklahoma administering the program.<sup>2</sup>

When a tribe registers as an ITO, it has the same administering power as a state agency. Tribes that do not register as ITOs must work with state agencies to receive benefits from federal programs. FDP is a direct substitute for SNAP. While eligible tribal citizens may apply for SNAP, they cannot simultaneously receive SNAP and FDP benefits. If a tribe is not registered as an ITO, its tribal citizens can go through their state agency to receive SNAP benefits instead of FDP benefits. State agencies are able to implement FDP, but there are only five state agencies across the U.S. implementing FDP to date. In comparison, there are 100 ITOs implementing FDP in the United States.<sup>3</sup> Because of the unique structure of FDPIR administration in tribal service areas and Oklahoma’s lack of reservation boundaries, approximately 30 percent of FDPIR participants are in Oklahoma.<sup>4</sup>

Any low-income American Indian household may be eligible for FDP, as long as the household contains at least one member of a federally recognized tribe. Households must meet income eligibility requirements, as well as the non-financial requirements mentioned above. The net monthly income standard for FDP is calculated by adding the SNAP monthly income standard and the SNAP standard deduction together. The net monthly income standard for a family of four on FDP is \$2,189.<sup>5</sup>



An individual or household can apply for FDP by contacting an ITO or FNS regional office.<sup>6</sup> The application process for FDP may differ among ITOs. The Chickasaw Nation conducts an interview and supplies an electronic application in-house, which can be completed with the assistance of its staff.<sup>7</sup> The Chickasaw Nutrition Services stated that, once certified, most households may receive food packages within the same day as application.

Certified households must be recertified every 12 months and cannot participate in FDPIR and SNAP within the same month. The Chickasaw Nutrition Services reports that it does regular participation checks. The maximum length of program participation is five years (consecutive or not).<sup>8</sup> Participating households receive a food package each month with nutritionally-balanced USDA foods. Participants are able to choose from over 100 pre-approved products. ITOs and state agencies are responsible for ordering, storing, and distributing the food,<sup>9</sup> allowing different distribution models. For example, the Chickasaw Nation uses a store model, where FDP participants “shop” for their FDP food items.<sup>10</sup>

In 2015, Oklahoma had an average yearly participation of 31,042 individual persons.<sup>11</sup> Participation in FDPIR was relatively consistent between 2011 and 2013. However, since 2013, the program has seen a substantial increase in participation (from 25,678 in 2013 to 31,042 in 2015).<sup>12</sup>

## PARTICIPATION IN THE FEDERAL DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS IN OKLAHOMA, FY 2011-2015



Figure 22. Participation in the FDPIR has seen growth between 2013 and 2015.

## // Commodity Supplemental Food Program

**T**he Commodity Supplemental Food Program (CSFP) is a federal distribution program that seeks to improve the health of seniors over the age of 60, by supplementing their diets with nutritious USDA foods.<sup>13</sup> The program is administered by the USDA's Food and Nutrition Service (FNS). FNS provides USDA foods to state agencies and Indian Tribal Organizations (ITOs). In Oklahoma, the Department of Human Services (OKDHS) is responsible for administering CSFP on a state level. OKDHS partners with local food banks to facilitate the program, specifically the Regional Food Bank of Oklahoma and the Community Food Bank of Eastern Oklahoma (CFBEO).<sup>14</sup>

OKDHS funnels administrative funds and commodities to the food banks. The food banks are responsible for filling the caseload and distributing commodities to individuals. Applicants must reach out to either food bank (or their CSFP partner sites) in order to apply for CSFP, and the food banks administer the application process in-house. State agencies are responsible for determining the eligibility requirements (income limits) for applicants, which can vary across states.<sup>15</sup> Oklahoma follows the USDA's suggestion to set the limit at 130 percent of the federal poverty guideline.<sup>16</sup>

States are allotted a certain number of cases, based on their ability to use the allocation. If a state is unable to do so, its unfilled cases are reassigned to states that have filled their caseload and have requested for more. The Regional Food Bank has administered the program since 2010, and CFBEO has administered the program since 2013. Currently, the Regional Food Bank's average monthly participation in CSFP is 2,996 individuals.<sup>17</sup> CFBEO has a

caseload of 326 unique individuals.<sup>18</sup> Both food banks report capacity to increase their caseload. In total, FRAC reports an average monthly participation of 2,974 during FY15, bringing in \$916,332 in federal funding.<sup>19</sup>

Both regional food banks indicated that waiting lists could be long for the program, because a CSFP participant can remain on the program indefinitely although at this time wait lists are manageable. There are no participation term limits on CSFP, like there are for SNAP or FDPIR. The Regional Food Bank reports 318 individuals on its wait list in July 2016.<sup>20</sup> Low-income seniors may receive benefits as long as they meet the income and age requirements, but caseloads for CSFP do not increase as need increases, since the state is allotted a certain number of cases. This results in long waiting lists and states having to wait for the USDA to reallocate cases from other states that were unable to fill their existing caseload.

Both the Regional Food Bank and CFBEO administer the application process for CSFP. The Regional Food Bank conducted outreach in 2016, due to turnover in its partner sites.<sup>21</sup> CFBEO did outreach within its Food Bank Member Programs when they first started the program in 2013, because there was demand among existing partners.<sup>22</sup>

Food packages are distributed once a month. Participants receive their food packages from the food banks' distribution partner sites. Currently, the Regional Food Bank has 31 CSFP sites, while CFBEO has seven CSFP sites where participants can receive their food packages. Oklahoma has a total of 38 CSFP sites in the state.



## // The Emergency Food Assistance Program

The Emergency Food Assistance Program (TEFAP) is a federal program that helps supplement the diets of low-income Americans.<sup>23</sup> The program is administered by the USDA's Food and Nutrition Service (FNS) and provides USDA foods to low-income individuals and households and is distributed through Eligible Recipient Agencies (ERAs). ERAs are nonprofit or public organizations that have TEFAP agreements with their state agency. ERAs receive commodities (USDA foods) and distribute meals or food for household consumption. ERAs can provide food to low-income individuals and households by partnering with Emergency Feeding Organizations (EFOs) in the community. Some examples of EFOs would include: shelters, food pantries, food banks, soup kitchens, or community action agencies. ERAs have TEFAP agreements with state agencies, allowing them to distribute TEFAP commodities through EFOs.<sup>24</sup> The USDA provides administrative funding for states implementing TEFAP. This administrative funding is passed through to EFOs. Total federal entitlement funding for TEFAP in Oklahoma in 2015 was \$3,495,855 and federal bonus commodity funding was \$3,606,518.<sup>25</sup>



In Oklahoma, the Department of Human Services (OKDHS) is responsible for TEFAP agreements with ERAs. There are two ERAs in Oklahoma: the Regional Food Bank of Oklahoma and the Community Food Bank of Eastern Oklahoma (CFBEO).<sup>26</sup> The Regional Food Bank and CFBEO receive TEFAP commodities from the USDA and are responsible for storing and distributing the food. These ERAs distribute foods to local EFOs (food bank partners). The amount of food given to states for TEFAP is based on the number of unemployed persons and the number of people with incomes below the poverty level.<sup>27</sup>

In FY 2015, the Regional Food Bank reports a total TEFAP participation of 421,632 unduplicated individuals.<sup>28</sup> In FY 2014, the Regional Food Bank distributed more than 5.1 million pounds of TEFAP commodities,<sup>29</sup> and CFBEO distributed 3 million pounds of TEFAP commodities throughout the 24 counties it serves.<sup>30</sup>

Applicants must contact an ERA or EFO to apply for TEFAP. The state agency determines the criteria for which households are eligible to receive food for household consumption.<sup>31</sup> In Oklahoma, the application process requires a self-declaration of income and a proof of address.<sup>32</sup> Once the application process is completed, households can receive food packages once every 30 days as needed. There is no application process for individuals receiving meals (made with TEFAP commodities) from EFOs.

On June 10, 2016, the USDA delivered a memorandum on TEFAP regulations to be implemented nationally. The memorandum clarified regulations for religious organizations acting as ERAs. Religious organizations receiving USDA foods or administrative funds for TEFAP and CSFP are required to provide participants (current and prospective) written notices of the right to be referred to an alternate provider when available. Religious organizations are not allowed to discriminate against beneficiaries for their religion or beliefs, refusal to hold religious beliefs, or refusal to attend or participate in religious practice.<sup>33</sup> The enforcement of these regulations could affect the number of religious organizations willing to provide assistance through TEFAP.



# Potential for Program Growth

**W**e have taken a look at each of the primary federal nutrition assistance programs by examining how the programs are administered in Oklahoma and what participation trends look like. It's clear that each of these programs warrant needed growth – both through increasing the accessibility of and participation in them. This section provides a picture of what potential growth could look like, including the potential number of people that would be reached and the potential reimbursements the state would accrue. These goals are ambitious and our aim is to set high standards for participation in the priority federal nutrition programs: School Breakfast, Summer Meals, Afterschool Meals, SNAP, and WIC.

Understanding what the existing landscape of food assistance looks like is helpful before estimating growth. The pie chart on the next page visualizes the distribution of public and private food assistance in Oklahoma. SNAP is the largest program, bringing in the most reimbursement dollars to the state (66%).<sup>1</sup> Child nutrition programs, which include School Breakfast, Summer Food Service Program, Afterschool Meals, National School Lunch Program,<sup>2</sup> and WIC,<sup>3</sup> comprised about 22 percent of total food assistance in the state in FY 2015. While systematically quantifying private assistance is impossible, the private funding through the food banks makes up approximately seven percent of total food assistance.<sup>4</sup> The food distribution programs<sup>5</sup> and the Older Americans Act (which provides home and community-based services for seniors, including nutrition programs and Meals-on-Wheels) together comprise about five percent of the total food assistance.<sup>6</sup>



## OKLAHOMA FOOD ASSISTANCE IN MILLIONS, FY 2015

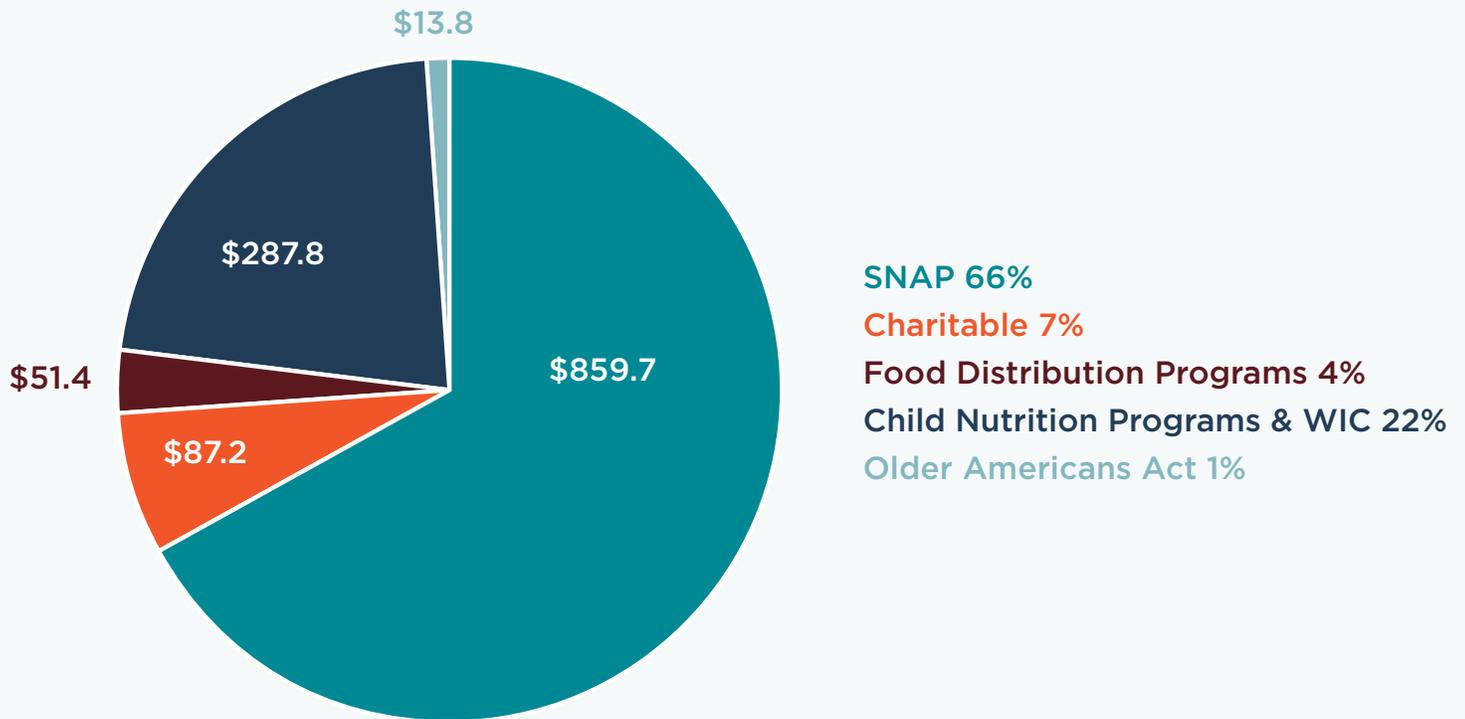


Figure 23. SNAP makes up the largest share of food assistance in Oklahoma.

### SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM

SNAP's recent decline in the absolute number of individuals participating and in the participation rate (80%) among eligible individuals indicates unreached need.<sup>7</sup> SNAP is the largest safety net program in Oklahoma, serving the largest share of individuals and families and has the highest total reimbursements for the state. Because seven states have achieved 100 percent participation among eligible individuals,<sup>8</sup> Hunger Free Oklahoma (HFO) suggests Oklahoma sets its SNAP participation rate at 100 percent. If Oklahoma met the 100 percent goal, approximately 150,000 additional individuals would have access to food benefits, and the state would accrue an additional \$227.1 million (see table below).<sup>9</sup>

### SNAP CURRENT AND POTENTIAL PARTICIPATION

2013 SNAP Participation Rate	2013 Estimated Number of SNAP -Eligible Individuals	2013 Participation	2013 Federal Revenue	Goal Rate	Participation if 100% Rate Met	Federal Revenue if 100% Ratio Met
80.1% <sup>10</sup>	740,000 <sup>11</sup>	592,740 <sup>12</sup>	\$958,684,325 <sup>13</sup>	100%	740,000	\$1,185,723,903

## WOMEN, INFANTS, AND CHILDREN (WIC)

Oklahoma's WIC participation rate<sup>14</sup> (53.9%) has declined at a much faster rate than the U.S. and with increased enrollment in SoonerCare among infants in Oklahoma,<sup>15</sup> there is evidently unmet need. Increasing enrollment, particularly for infants and children, is a priority. The highest state WIC participation rate is 85 percent. HFO suggests setting a participation goal of 85 percent of WIC-eligible individuals in Oklahoma. If Oklahoma met the 85 percent goal, 67,000 additional individuals would have access to WIC benefits, and the state would accrue an additional \$32.4 million (see table below).<sup>16</sup>

### WIC CURRENT AND POTENTIAL PARTICIPATION

2013 WIC Participation Rate	2013 Estimated Number of WIC-Eligible Individuals	2013 Participation	2013 Federal Revenue	Goal Rate	Participation if 85% Rate Met	Federal Revenue if 85% Ratio Met
53.9% <sup>17</sup>	215,759 <sup>18</sup>	116,195 <sup>19</sup>	\$57,327,600 <sup>20</sup>	85%	183,395	\$89,825,593

## SCHOOL BREAKFAST PROGRAM

In 2014-2015, 58.5 percent of students who participated in free and reduced-price lunch participated in school breakfast.<sup>21</sup> While Oklahoma's participation ratio does not yet meet the FRAC benchmark of 70 percent, it is higher than the national average (54.3%) and has stayed relatively consistent over the last six years (no significant dips or declines). Therefore, HFO suggests setting a benchmark of 80 percent, which reflects the highest state participation rate (82.3% in West Virginia). If Oklahoma met the 80 percent participation benchmark, an additional 67,693 students would participate in breakfast, and the state would accrue an additional \$16.1 million (see table below).<sup>22</sup>

### SCHOOL BREAKFAST PROGRAM CURRENT AND POTENTIAL PARTICIPATION

2014-15 Breakfast Ratio	2014-15 FRP NSLP ADP	2014-15 FRP Breakfast ADP	2014-15 Total Reimbursements	Goal Rate	FRP Breakfast ADP if 80% Ratio Met	Total Reimbursements if 80% Ratio Met
58.5% <sup>23</sup>	314,243 <sup>24</sup>	183,701 <sup>25</sup>	\$57,365,246 <sup>26</sup>	80%	251,394	\$73,448,636

## SUMMER MEALS PROGRAM

In 2015, 6.4 percent of students who participated in free and reduced-price lunch participated in the Summer Meals Program. The summer participation ratio is the lowest of Oklahoma's child nutrition programs and is ranked 51<sup>st</sup> in the nation.<sup>27</sup> There is significant room for improvement in the program. HFO recommends utilizing FRAC's 40 percent benchmark as a goal for improvement. If Oklahoma met FRAC's 40 percent participation goal, an additional 99,174 students would participate in the Summer Meals Program, and the state would accrue an additional \$7.8 million (see table below).<sup>28</sup>

### SUMMER MEALS PROGRAM CURRENT AND POTENTIAL PARTICIPATION

2015 Summer Ratio	2014-15 FRP NSLP ADP	2014-15 FRP Summer ADP	2014-15 Revenue for SFSP	Goal Rate	FRP Summer ADP if 40% Ratio Met	Federal Revenue if 40% Ratio Met
6.4% <sup>29</sup>	294,760 <sup>30</sup>	18,730 <sup>31</sup>	\$4,639,075 <sup>32</sup>	40%	117,904	\$12,466,369

## AFTERSCHOOL MEALS PROGRAM

The Afterschool Alliance indicates that 230,198 students are not currently participating in an afterschool program but would if one were available to them. In 2014-15, 68,751 students were enrolled in an afterschool program in Oklahoma.<sup>33</sup> This means that a total of 298,949 students may be eligible to participate in an Afterschool Meals Program. In 2014-15, 22,039 students received a meal or snack at an afterschool program (through either NSLP Afterschool Snacks or CACFP At-Risk),<sup>34</sup> which means only 7.4 percent of students who might participate in an afterschool program are receiving a snack or meal.<sup>35</sup> If 85 percent of students interested in participating in an afterschool program received a meal, afterschool meals would reach 254,107 children, resulting in an additional reimbursement of \$123.9 million per year. With an increase in the number of schools and districts mandating the implementation of afterschool programs, the structure for meals programs will be in place, encouraging more children to participate. If Oklahoma met the 85 percent goal, 232,068 additional students would have access to afterschool meals, and the state would accrue an additional \$121 million (see table below).<sup>36</sup> (The calculation for additional reimbursement total assumes that all additional students would receive a supper since it provides the most nutrition for children and programs receive a higher reimbursement for supper delivery.)

### AFTERSCHOOL MEALS PROGRAM CURRENT AND POTENTIAL PARTICIPATION

2014-15 Afterschool Ratio	2014-15 Number of Students eligible for an afterschool program	2014-15 Afterschool Meals ADP	2014-15 Federal Revenues for Free Snacks and Meals (NSLP and CACFP At-Risk)	Goal Rate	Afterschool Meals ADP if 85% Ratio Met	Federal Revenue if 85% Ratio Met
7.4% <sup>37</sup>	298,949 <sup>38</sup>	22,039 <sup>39</sup>	\$2,934,129 <sup>40</sup>	85%	254,107	\$123,957,591

The figure below depicts the potential number of individuals who would participate if Oklahoma met 100 percent of the participation goals described above for each federal nutrition program. The Afterschool Meals and Summer Meals Programs have the most room for growth, and SNAP has the potential to serve the most individuals.

**NUMBER OF CURRENTLY PARTICIPATING INDIVIDUALS AND ADDITIONAL INDIVIDUALS PARTICIPATING IF OKLAHOMA MET 100% OF THE RECOMMENDED PARTICIPATION GOAL**

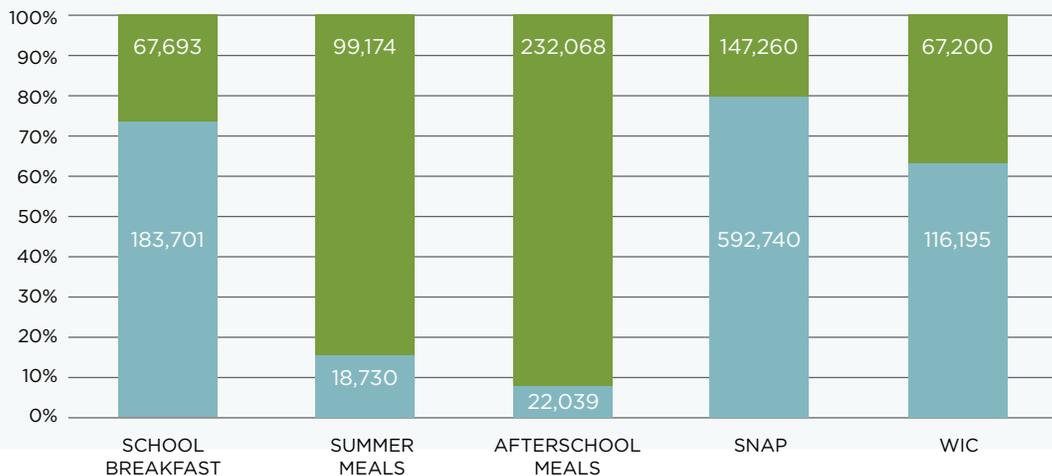


Figure 24. The Summer Meals and Afterschool Meals Programs have the most room for growth.

The figure below depicts the potential revenue dollars if Oklahoma met 100 percent of the recommended participation goals for each priority federal nutrition program. SNAP and the Afterschool Meals Programs have the potential to accrue the most reimbursement dollars. If suppers were served at Afterschool Meal programs, the reimbursement dollars would be significantly higher than what the state would receive on snack reimbursements.

**CURRENT REVENUE DOLLARS AND ADDITIONAL REVENUE DOLLARS IF OKLAHOMA MET 100% OF THE RECOMMENDED PARTICIPATION GOAL**

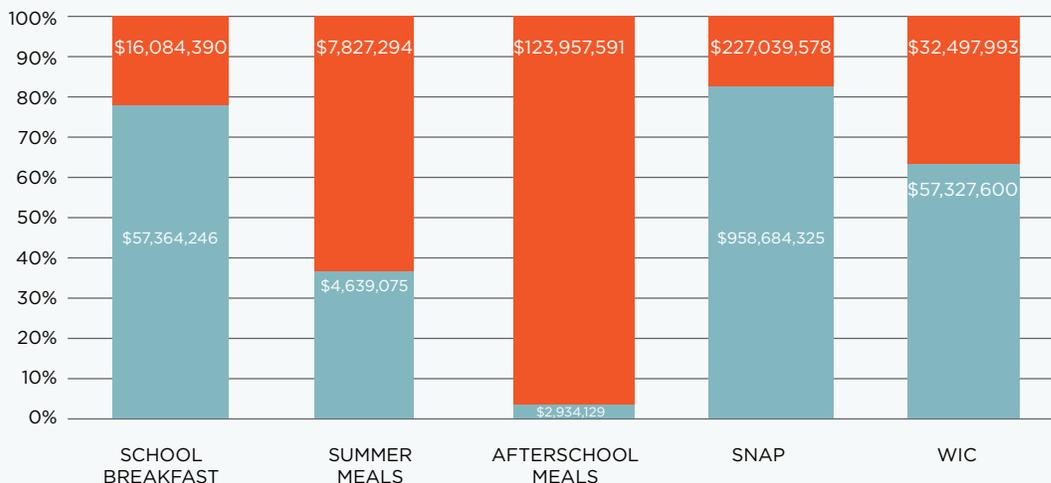


Figure 25. Afterschool Meals and Summer Meals Programs have the most room for growth.



In terms of expansion, Oklahoma has the resources to address food insecurity in the state. While SNAP has the potential to reach more individuals and bring in the most reimbursement dollars for the state, the Afterschool Meals and Summer Meals Programs have the most room for improvement. In total, the state could annually accrue an additional \$404.5 million, with a total potential of \$1.5 billion across priority federal nutrition programs.

# Concluding Remarks

## // Next Steps

As stated in the introduction, there are many organizations and individuals doing the hard work to address hunger in Oklahoma, but a lack of strategic coordination is preventing the state from reaching its maximum potential. In our interviews, we saw numerous instances of creative partnerships, including many cross-disciplinary examples. In addition, we have seen a few multi-sector coalitions, (like the hard-working, but under-staffed Tulsa Food Security Council and the Oklahoma Food Security Council) with focused, but limited objectives. What does not exist is a comprehensive, statewide, multi-sector coalition that encompasses both advocacy and federal program outreach. A critical key to turning around food insecurity rates in Oklahoma is the creation and support of such an entity. Equally important to this coalition is the need for a backbone organization that provides vision, support, and technical assistance. Such an organization would provide a forum for collaboration with national nonprofits, a collective voice for food-insecure Oklahomans, and an infrastructure for collaborative grants. The Anne and Henry Zarrow Foundation, in collaboration with the Texas Hunger Initiative and others, has already initiated a solution to this concern by supporting the creation of *Hunger Free Oklahoma*.





Our recommendations center on the three primary roles that Hunger Free Oklahoma (HFO) can fill by convening Oklahoma stakeholders, leveraging regional and national resources, and implementing data-driven, evidence-based interventions.

**POLICY AND ADVOCACY:** State agencies, policies, and legislative actions need to be coordinated in order to be most efficient and effective. HFO should convene Oklahoma stakeholders to develop and implement a comprehensive policy plan that includes improvements to state and local agency policies, as well as state legislative action. HFO can look to other states that have expanded access and participation in the federal nutrition programs through better policy. Since states often have broad discretion in how they administer the federal nutrition programs, state agency administrators and elected officials have the capacity to significantly affect program participation rates. HFO can build coalitions that collaborate with and, when necessary, hold these public servants accountable to ensure that the programs are structured and delivered in ways that maximize their potential to meet the needs of food-insecure Oklahomans.

It is our recommendation that HFO start its policy and advocacy efforts by working with leadership and staff of the Oklahoma State Department of Education to refine and strengthen systems for capturing local child nutrition program data, as well as supporting districts' and schools' efforts to adopt the Community Eligibility Provision, after-the-bell breakfast models, and afterschool meals. With the important work already being done in Oklahoma, these areas offer the potential for quick gains in addressing child hunger.

**COLLABORATION:** No single person or entity is responsible for addressing hunger in Oklahoma; the same principle holds true on the community level. HFO should lead the way for creating and supporting statewide and community-level coalitions that think and act strategically. Likewise, there is a growing body of best practices that HFO can draw from to empower communities to find local solutions for local problems.

It is our recommendation that HFO starts by providing vision and leadership for a collaborative plan to expand Summer Meal participation across the state. HFO can provide technical assistance to sponsors, sites, and vendors, especially in Oklahoma City and Tulsa. HFO should research and recognize best practices, with a particular spotlight on demonstrating the importance of cross-sector collaboration. Oklahoma is at the bottom of Summer Meal participation in the country, but a strong, collaborative effort could turn that around.



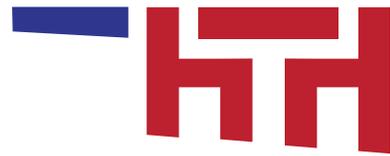
**FEDERAL PROGRAMS OUTREACH:** While charity plays an important role, it will not solve hunger. Oklahoma will continue to have dismal food security statistics until comprehensive, ambitious outreach programs are implemented. HFO should convene multi-sector coalitions that review data, understand implementation systems, grapple with barriers and develop aggressive plans to expand participation in SNAP, WIC, and the Child Nutrition Programs.

HFO should start working with elected officials, private funders, and the nonprofit community to ensure that Oklahoma utilizes federal SNAP outreach funds to reach eligible people and modernizes its severely outdated application system. We recommend that HFO build the type of public-private partnerships that have proven effective in reaching hard-to-reach populations in other states. Oklahoma is currently barely scratching the surface of vast, untapped resources for supporting this work.

Taking these steps will require significant commitment and cooperation but will yield great reward.

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The challenge of food insecurity in Oklahoma is sobering, but the work being done and the potential to move forward is inspiring. Though we know that children and families across our state are going hungry, we also know that individuals and organizations are working to change this reality. The resources—food, knowledge, programs, people—are here and ready to be maximized, and it is time for us to put an end to food insecurity. Together, we can inspire change and find solutions that ensure that everyone one in Oklahoma has access to 3 healthy meals a day, 7 days a week.



**HUNGER ★ FREE**  
O K L A H O M A

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**THE ANNE & HENRY ZARROW**  

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