



# Child Nutrition Program Operations During the COVID-19 Pandemic, March through September 2020

School Meals Operations Study, Year 1 Report (Final)

May 2023

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# Child Nutrition Program Operations During the COVID-19 Pandemic, March through September 2020

### School Meals Operations Study, Year 1 Report (Final)

#### May 2023

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### **Executive Summary**

The U.S. Department of Agriculture, Food and Nutrition Service's (FNS) Child Nutrition programs help ensure that children in low-income families do not go hungry and have access to safe, nutritious foods at schools and in other settings. The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are the largest Child Nutrition programs. FNS oversees these programs, and State agencies administer them through agreements with local School Food Authorities that implement the programs in schools.

FNS assesses school meal operations on a school-year basis with a study series that was modified in School Year (SY) 2020-2021 because of the start of the COVID-19 pandemic public health emergency the largest nationwide disruption of school meals programs since they were enacted. When the pandemic began in March 2020, the Families First Coronavirus Response Act provided FNS with the authority to establish waivers for the purpose of providing meals under the Child Nutrition Programs with appropriate safety measures. With this authority, FNS issued nationwide waivers of certain program rules that provided States and local program operators with flexibilities to help them serve meals to children who were no longer routinely being educated in school buildings due to the pandemic. The key Child Nutrition Programs used to provide meals to children during the early pandemic months included the NSLP, SBP, NSLP Seamless Summer Option (SSO), Summer Food Service Program (SFSP), and Child and Adult Care Food Program (CACFP).

Data collection for this report focused on gathering information from State agencies about Child Nutrition Program operations during March through September 2020, including information on the COVID-19 Child Nutrition nationwide waivers that FNS approved for use during that period.

Findings for March through September 2020 include:

- The number of children served meals decreased substantially in the spring of 2020; however, a significantly greater number of children received meals in summer 2020 than in previous summers
- By September 2020, Child Nutrition Programs were serving more meals to more children
- State agencies consistently reported that use of the COVID-19 Child Nutrition nationwide waivers improved services to children
- State agencies and local program operators more frequently used the COVID-19 Child Nutrition nationwide waivers for SSO and SFSP than for NSLP, SBP, and CACFP from March through September 2020.
- Meal service generally moved outside of school and daycare buildings to meal sites in locations near children's homes or where more children participated in Child Nutrition Programs, during this period
- Operators used a variety of new and alternative meal delivery methods and options to serve children
- The pandemic presented new operational and financial challenges for States and local program operators

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### I. Introduction

The School Meals Operations Study (SMO) is part of an ongoing study series to assess school meal operations on a school-year basis. When the COVID-19 pandemic public health emergency began in March 2020, the scope of this study was modified starting with school year (SY) 2019-2020 to to focus on gathering information about Child Nutrition Program operations and statutorily required information on the COVID-19 Child Nutrition nationwide waivers approved by FNS to provide States and local program operators with flexibilities to help them serve meals to children during the pandemic.

This report describes key findings from the first year of the School Meals Operations Study (SMO), including findings related to Child Nutrition Program participation and meals served, operational and financial challenges State agencies and local program operators experienced during the pandemic, and the use of COVID-19 Child Nutrition nationwide waivers including the effects of the waivers on services to children.

#### A. Background

The U.S. Department of Agriculture (USDA) Food and Nutrition Service's (FNS) Child Nutrition Programs help ensure that children in low-income families do not go hungry and have access to safe, nutritious foods at school and in other settings. These include the school meals programs, which include the National School Lunch Program (NSLP) and the School Breakfast Program (SBP), the summer meal programs, which are the NSLP Seamless Summer Option (SSO) and the Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP). Over the decade preceding the COVID-19 pandemic, the largest of these programs, the NSLP, served approximately 5 billion meals to about 30 million children annually.

FNS oversees these programs, and State agencies administer them through agreements with local program operators, such as School Food Authorities (SFAs). FNS requires information about program operations to effectively oversee the programs and inform current and future policy decisions.

FNS has an ongoing study series to assess school meal operations on a school-year basis. Topics studied by the series include school and site participation, student and child participation, and meal counting.

The scope of the study series was modified starting with SY 2019-2020 due to the start of the COVID-19 pandemic public health emergency. When the pandemic began in March 2020, the Families First Coronavirus Response Act (FFCRA) provided FNS with the authority to establish waivers for the purpose of providing meals under the Child Nutrition Programs with appropriate safety measures. With this authority, FNS issued nationwide waivers of certain Child Nutrition Program rules that provided States and local program operators with flexibilities to help them serve meals to children who were no longer routinely being educated in school buildings due to the pandemic (Appendix A).

The programs used to provide meals to children during the early pandemic months included NSLP, SBP, SSO, SFSP, and CACFP. SSO and SFSP are traditionally associated with summer meal service, but these programs are also used to provide meal service during unanticipated school closures, such as those related to weather events and other emergencies. SFAs implement NSLP and SBP in schools, and they implement SSO at a variety of sites, including schools, summer camps, and other locations. Sponsors, which may include SFAs, implement SFSP at a similar range of site types. Institutions implement CACFP at child care outlets, including child care centers and family day care homes.

Data collection for this report focused on gathering information about Child Nutrition Program operations from March through September 2020, including meal service and challenges, as well as statutorily required information on the COVID-19 Child Nutrition nationwide waivers approved for use during that period. Specifically, the FFCRA required that State agencies using each waiver report to FNS on (1) use of the waiver by the State agency and local program operators, and (2) whether and how the waiver resulted in improved services to program participants. For certain waivers, FNS identified specific actions that State agencies using the waivers were required to take and report on. For example, for State agencies using the waiver allowing parents and guardians to pick up meals without children present, FNS required that program operators put processes in place to ensure (1) meals were distributed only to parents and guardians of eligible children and (2) duplicate meals were not distributed to any child.

#### B. Data collection

Data collection involved obtaining survey and administrative data from the 67 State agencies that administer NSLP, SBP, SSO, SFSP, and CACFP in the 50 States, District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands.<sup>1</sup> The survey of State agencies was fielded in spring 2021 and gathered information to address the reporting requirements for the COVID-19 Child Nutrition nationwide waivers used in March through September 2020 as well as information on COVID-19 meal service and challenges during that period. The administrative data collection gathered data on program participation and meals served in the Child Nutrition Programs during the months of March through September 2020<sup>2</sup> as well as data on NSLP and SBP participation and meals served in the months preceding the start of the pandemic (October 2019 through February 2020). Appendix B includes additional information about the data collection methods used for this report and limitations of the data.

#### C. Organization of report

The chapters that follow describe the March through September 2020 study findings and key results. Chapter II describes findings related to Child Nutrition Program participation and meals served, focusing on trends in the initial months of the pandemic, the summer months of June and July 2020, and the early months of SY 2020-2021. Chapter III describes the operational and financial challenges State agencies and local program operators experienced during the pandemic. Chapter IV describes findings on use of the COVID-19 Child Nutrition nationwide waivers, meal service methods, and how waivers improved services to children during the March through September 2020 period. Chapter V provides a brief overview of the next report of the study series, and the appendices provide supplemental information and tables.

<sup>&</sup>lt;sup>1</sup> Data collection included 67 State agencies, as more than one State agency administered NSLP, SBO, SSO, SFSP, and CACFP in some States.

<sup>&</sup>lt;sup>2</sup> Each month, State agencies report program data to FNS. The data are aggregated at the State level for NSLP, SBP, and SSO on the FNS-10, Report of School Program Operations; SFSP on the FNS-418, Report of the Summer Food Service Program for Children; and for CACFP on the FNS-44, Report of the Child and Adult Care Food Program. For this study, we requested State agencies submit the data elements collected on these forms disaggregated at the site or local program operator level, depending on the level available from the State agency. This data collection request was the first time State agencies have been asked to provide FNS-10, FNS-418, and FNS-44 data in this way.

### **II.** Child Nutrition Program Participation and Meals Served

This chapter describes findings related to Child Nutrition Program participation and meals served, focusing on trends in the initial months of the pandemic (March through May 2020), the summer months (June and July 2020), and the early months of SY 2020–2021 (August and September 2020).

At the start of the pandemic, child participation and meals served through NSLP and SBP decreased significantly as school buildings closed, though some children also began receiving meals through SSO and SFSP. In addition, substantially more meals were served through the summer meal programs in the summer of 2020 as compared to previous years. Child participation and meals served through CACFP dropped at the beginning of the pandemic, and then increased to some extent, nearing pre-pandemic levels by September 2020.

# A. The onset of the COVID-19 pandemic disrupted Child Nutrition Programs in spring 2020

When the COVID-19 pandemic began in mid-March 2020, many schools and child care operators across the country stopped providing in-person education and services, resulting in a significant disruption to the Child Nutrition Programs that typically provide meals to children in those settings. During normal operations, SSO and SFSP provide meal service during the summer months and during unanticipated school building closures. As school buildings closed due to the pandemic, to ensure children's continued access to meals many SFAs and local program operators shifted to providing meal service through these programs (Food and Nutrition Service 2020a) during the March through May 2020 time period.

#### 1. Programs used to provide meals changed

SY 2019–2020 began as a typical school year, with about 97,000 schools participating in NSLP and 91,000 participating in SBP (Food and Nutrition Service 2020b). However, after the COVID-19 pandemic began in March 2020, the number of schools serving meals through NSLP and SBP dropped significantly. Some schools shifted to serving meals through SSO or SFSP, and in April and May 2020, among the 44 States that provided school-level FNS-10 data and 45 States that provided site-level FNS-418 data for this study, about 17,000 sites nationwide were operating SSO and 26,000 were operating SFSP. However, the total number of schools and sites in operation in April and May was still far lower than the total number operating before the pandemic (Appendix Tables <u>C.1</u> and <u>C.2</u>).

Beginning in March, some local program operators used the area eligibility nationwide waiver to provide meals and snacks to all children at SSO and SFSP sites. This waiver allowed sponsors, regardless of their location, to operate open SSO and SFSP sites. Among States that provided data on use of the area eligibility waiver as part of the FNS-10 and FNS-418 administrative data collection, in March 16 percent of SSO sites and 13 percent of SFSP sites in operation were new area eligible sites. Overall, over 90 percent of SSO and SFSP sites were open sites (Appendix Table C.3).

Before the pandemic, about 90,000 family day care homes and 70,000 child care centers were participating in CACFP (Food and Nutrition Service 2020b). Although many child care outlets stopped serving CACFP meals during those months, the decrease in participation was less severe in that program.

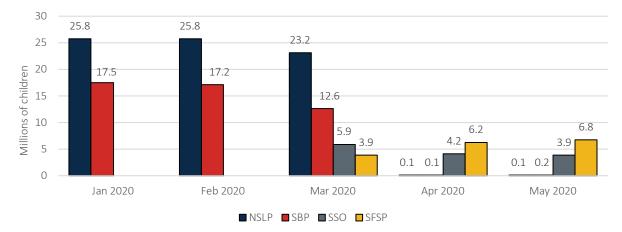
For example, from March to April 2020, the number of outlets serving CACFP meals decreased by almost 50 percent in the 43 States that provided these data<sup>3</sup> (Appendix Table <u>C.4</u>).

#### 2. Child participation and meals served across all programs decreased substantially

Consistent with the decrease in the number of school and child care buildings in which meal service was provided during spring 2020, the number of children participating in NSLP, SBP, and CACFP, and the number of meals served in those programs, also dropped substantially. While SSO and SFSP filled some of the gap, the number of children served and the total number of meals served in April and May fell far short of pre-pandemic levels.

From February to April, the COVID-19 pandemic unfolded and States and local program operators transitioned to serving children in new ways (discussed in Chapters III and IV). Families also adjusted to new daily routines. During these early months of the pandemic, the number of children participating in NSLP dropped from 26 million to 112,000, and the number participating in SBP dropped from 17 million to 132,000 (Figure II.1 and Appendix Table <u>C.5</u>). While some of the children who were participating in NSLP or SBP before the pandemic may have begun receiving meals through SFSP and SSO, only 10 million total children participated in SFSP and SSO in April.

Nearly equal numbers of children participated in NSLP and SBP in April as shown in Figure II.1. As shown in later figures, this trend continued through the summer. This is a departure from typical child participation patterns in these programs, where child participation in NSLP is approximately twice as high as participation in SBP (Food and Nutrition Service 2020b).



#### Figure II.1. Child participation in NSLP, SBP, SSO, and SFSP, January-May 2020

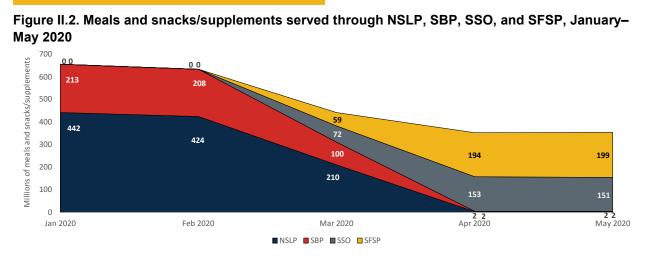
Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2020.

Note: For SSO and SFSP, Child participation equals the meal count for the meal with the most claims in the divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals. Pennsylvania did not provide operating days or average daily meals for SFSP and is therefore excluded from SFSP participation data.

<sup>&</sup>lt;sup>3</sup> Each month, State agencies report CACFP data to FNS; the data are aggregated at the State level on the FNS-44, Report of the Child and Adult Care Food Program. The study team collected these data from States aggregated at the outlet or institution level, depending on the level available at the SA. Forty-three States were able to provide outletlevel data for the March through September 2020 period.

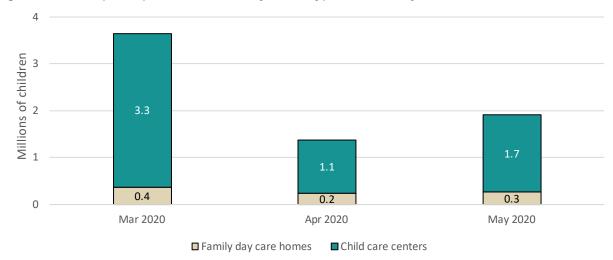
Across all four programs, there was a 69 percent decrease in child participation between March and April. From April to May, the total number of children served was relatively stable, though more children were served through SFSP in May as compared to April, while fewer were served through SSO.

Figure II.2 shows the number of meals served in Child Nutrition Programs between January and May 2020. This figure shows a large decrease in the number of meals served through NSLP and SBP, and increases in the number of meals served through SSO and SFSP. This finding is consistent with changes in the number of schools and sites operating each Program and child participation, both of which also decreased for NSLP and SBP, and increased for SSO and SFSP between January and May.



Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2020.

About 3.5 million children participated in CACFP in March 2020, when CACFP data collection for this study began. In March, about 3 million children in child care centers participated in CACFP and about 400,000 in family day care homes. These numbers likely reflect a decline in child participation that had already begun due to the COVID-19 pandemic. Child participation in both child care centers and family day care homes further decreased in April to 1 million and 200,000, respectively. In May, child participation increased to 1.7 million in child care centers and 300,000 in family day care homes, as some child care outlets either re-opened or opened for meal service after initial school building closures (Figure II.3 and Appendix Table <u>C.6</u>).

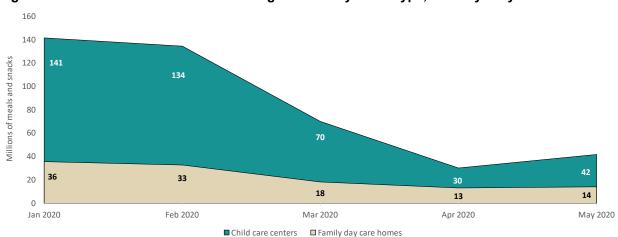




Source: School Meals Operations Study, disaggregated FNS-44 data from fiscal year 2020.

Note: Fiscal Year 2020 Child and Adult Care Food Program data from the School Meals Operations Study are available for March through September 2020. Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals.

The number of meals and snacks served follows a similar trend as child participation, both for child care centers and family day care homes (Figure II.4 and Appendix Table <u>C.7</u>). However, the percentage decrease in meals served in child care centers was more substantial than the decrease in meals served in family day care homes, likely reflecting that a greater proportion of child care centers closed or otherwise stopped serving meals during the early months of the pandemic.





Source: January and February 2020 data are from U.S. Department of Agriculture Food and Nutrition Service Program Information Report (Keydata) for fiscal year 2019 - 2020. March – May data are from School Meals Operations Study fiscal year 2020 disaggregated FNS-44 data.

# B. Summer 2020 brought increases in children served and meals served through the summer meal programs compared to previous years, and CACFP meal service began to recover from spring lows

During June and July 2020, child participation and meals served through summer meal programs were higher than in June and July of previous years. CACFP meal service also began to recover from April and May lows. In this section and Section C, findings are compared with the previous school year where relevant.

#### 1. SFSP, SSO, and CACFP were the primary programs used to serve meals

Consistent with the spring shift in local program operators operating SFSP and SSO, many sites operated SFSP or SSO during the summer months, and the total number of these sites increased somewhat from the April to May time period, when 17,000 sites were operating SSO and 26,000 were operating SFSP. Across June and July 2020, a total of about 48,000 sites operated SSO or SFSP, with about one-fourth of those operating SSO and three-fourths operating SFSP (Appendix Table <u>C.2</u>). Consistent with the spring, about 2,600 sites operated NSLP or SBP during the summer.

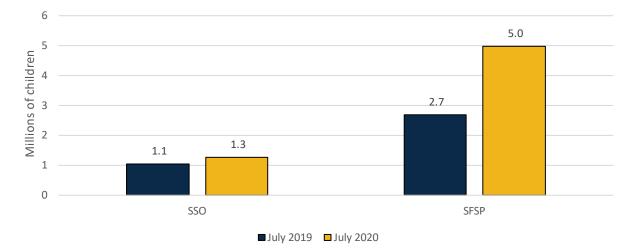
Among States that provided data on use of the area eligibility nationwide waiver, 18 percent of SSO sites in operation in June were new area eligible sites. This dropped to 6 percent of sites in July. Twelve percent of SFSP sites in operation in June were new area eligible sites. This increased to 13 percent in July. Among States that provided data on whether SSO and SFSP sites operated as open or closed, in June and July, over 90 percent of SSO and SFSP sites in operation were open sites (Appendix Table <u>C.3</u>)

In comparison to the April to May time period, there was also a modest increase in the total number of child care outlets operating CACFP during June and July 2020, with about 73,000 outlets operating CACFP in the 43 States that provided these data (Appendix Table <u>C.4</u>). However, the total outlets operating CACFP in those months was still far less than the 160,000 total outlets operating the program nationwide before the pandemic began.<sup>4</sup>

#### 2. SFSP and SSO served substantially more children and more meals than in previous summers

In June and July 2020, SFSP served meals to about 5 million children, which was almost double the 2.6 to 2.7 million children served SFSP meals in each of the five previous summers. In addition, SSO served meals to about 1.3 million children in July 2020 across the 40 States that provided these data (Figure II.5), an increase over the estimated 1.1 million children served SSO meals nationwide in July 2019 (Food and Nutrition Service 2020b).<sup>5</sup>

<sup>&</sup>lt;sup>4</sup> FNS Keydata shows 72,408 family day care homes and 31,737 child care centers operating in June 2020, for a total of 104,145 CACFP outlets operating that month across all States and territories. (Food and Nutrition Service 2020b) <sup>5</sup> FNS has traditionally considered July data reported by the States on children served through NSLP as a proxy for SSO. SMO requested that States provide SSO data separate from NSLP data, and 40 States were able to provide SSO participation data for the March through September 2020 period.



#### Figure II.5. Child participation in SSO and SFSP, July 2019 and July 2020

- Source: July 2019 data are from U.S. Department of Agriculture Food and Nutrition Service Program Information Report (Keydata) for fiscal year 2019 - 2020. July 2020 data are from School Meals Operations Study fiscal year 2020 disaggregated FNS-10 and FNS-418 data.
- Note: Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals. Pennsylvania did not provide operating days or average daily meals for SFSP and is therefore excluded from SFSP participation data.

Participation in Child Nutrition Programs overall traditionally decreases in the summer when children are not in school and taken together, as shown in Figure II.6 child participation across NSLP, SBP, SSO, and SFSP decreased between May and July 2020. However the decrease was small, and was much smaller than in previous summers.

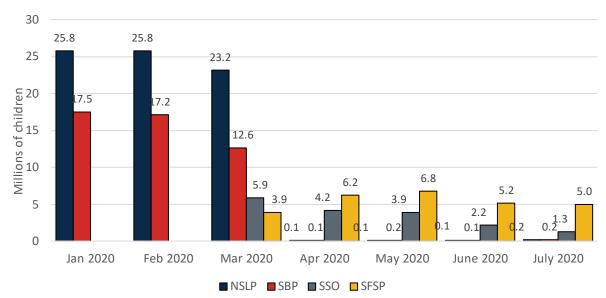


Figure II.6. Child participation in NSLP, SBP, SSO, and SFSP, January–July 2020

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2020.

Note: Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals. Pennsylvania did not provide operating days or average daily meals for SFSP and is therefore excluded from SFSP participation data.

At the same time, the number of meals and supplements served in SFSP in summer 2020 was more than double the number served through SFSP in the previous summer. For example, in July 2020, 175 million meals and supplements were served through SFSP across the 45 States that provided these data (Figure II.7), compared with 70 million SFSP meals served nationwide in July 2019. Of the 175 million meals and supplements served in July 2020, 87 million were lunches, 81 million were breakfasts, 4 million were supplements, and 3 million were suppers. In addition to the increase in the total number of meals and supplements served during summer 2020, the number of sites serving at least two meals was generally more prevalent than in previous years. More than 85 percent of SFSP sites served at least two meals in June and July 2020 (Appendix Table <u>C.8</u>) and the number of breakfasts served in June and July 2020 was almost equal to the number of lunches served. In comparison, in summer 2019, only about half the number of SFSP breakfasts were served as SFSP lunches. How waivers contributed to local program operators serving multiple meals per day is discussed in Chapter IV.

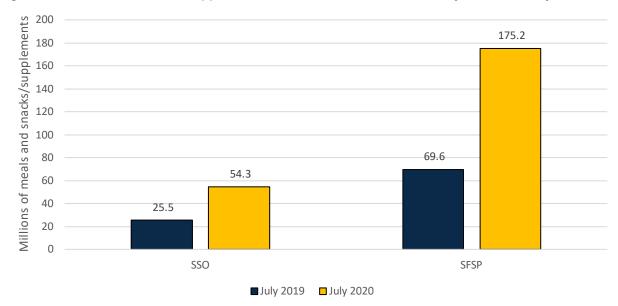


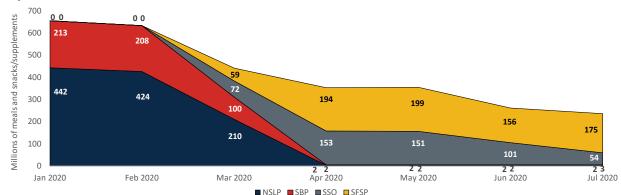
Figure II.7. Meals and snacks/supplements served in SSO and SFSP, July 2019 and July 2020

- Source: July 2019 data are from U.S. Department of Agriculture Food and Nutrition Service Program Information Report (Keydata) for fiscal year 2019 - 2020. July 2020 data are from School Meals Operations Study fiscal year 2020 disaggregated FNS-10 and FNS-418 data.
- Note: For July 2020 data on meals served, 26 States provided SSO data separate from NSLP data, and 45 States provided site-level FNS-418 data.

Also shown in Figure II.7, about 54 million meals were served through SSO in July 2020 across the 26 States that provided these data. Although this includes only about half of the States, this was more than double the estimated 25.5 million meals served through SSO nationwide in July 2019.<sup>6</sup> Similar to SFSP, SSO sites also predominantly served two meals in summer 2020, with 93 percent of sites reporting serving two meals in July 2020. In July 2019, about two thirds the number of SSO breakfasts were served as SSO lunches (Food and Nutrition Service 2020b).

As noted, participation in Child Nutrition Programs traditionally decreases in the summer when children are not in school, leading to a significant drop in the number of meals served in the summer compared to the school year. Although this trend continued in summer 2020, the drop was less severe, as shown in Figure II.8. For context, the 175 million meals served in SFSP in July 2020 across the 45 States that provided these data is greater than the total number of SFSP meals served from May through September 2019 nationwide.

Figure II.8. Meals and snacks/supplements served through NSLP, SBP, SSO, and SFSP, January–July 2020

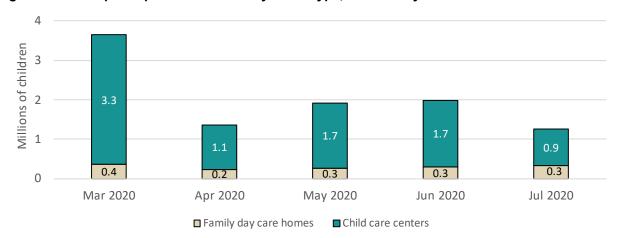


Source: School Meals Operations Study, disaggregated FNS-10 or FNS-418 data from fiscal year 2020.

#### 3. CACFP participation fluctuated and meals served started to recover from spring lows

Child participation in CACFP fluctuated to some extent in the summer months. In May and June, about 1.7 million children participated in CACFP in child care centers and 300,000 children in family day care homes. In July, about 900,000 children participated in CACFP in child care centers and 300,000 in family day care homes (Figure II.9 and Appendix Table  $\underline{C.6}$ ).

<sup>&</sup>lt;sup>6</sup> SSO is part of NSLP, but SSO serves both lunches and breakfasts. FNS has traditionally considered July data reported by the States on meals served through NSLP and SBP as a proxy for SSO meals served. SMO requested that States provide SSO data separate from NSLP and SBP data, and 26 States were able to provide this separated data on SSO meals served for July 2020.

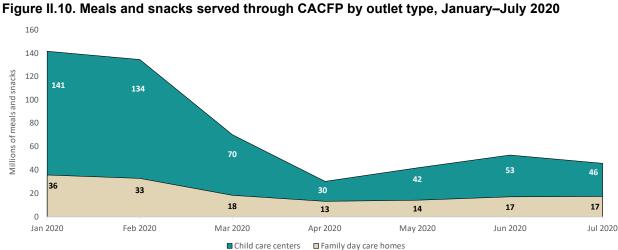




Source: School Meals Operations Study, disaggregated FNS-44 data from fiscal year 2020.

Fiscal Year 2020 Child and Adult Care Food Program data from the School Meals Operations Study are Note: available for March through September 2020. Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals.

At the same time, CACFP served more meals in the summer months, beginning to recover from spring lows, as shown in Figure II.10. This was consistent across outlet types, as the total number of meals served in child care centers and family day care homes was greater in both June and July than the number served in either April or May. One exception was the number of CACFP meals served in at-risk afterschool programs, which decreased slightly from May to June and then dropped by about five percent from June to July, consistent with at-risk afterschool programs pausing operations for the summer.



Source: January and February 2020 data are from U.S. Department of Agriculture Food and Nutrition Service Program Information Report (Keydata) for fiscal year 2019 - 2020. March – July data are from School Meals Operations Study fiscal year 2020 disaggregated FNS-44 data.

#### C. Program participation reflected uncertainty at the start of SY 2020–2021 (August– September 2020), yet more children and meals were served

Uncertainty at the beginning of SY 2020–2021 regarding (1) whether schools would operate in person, remotely, or using a hybrid approach, and (2) the ongoing availability of COVID-19 Child Nutrition nationwide waivers, led some local program operators to return to using school meal programs while others continued using summer meal programs to serve meals to children. At the same time, the number of sites operating, children participating, and meals served increased in all of the Programs.

# 1. Some local program operators returned to using school meal programs, while others continued using summer meal programs at sites

As the 2020-2021 school year began, there was a substantial increase in the number of schools operating NSLP and SBP, as some schools resumed in-person operations. This increase in NSLP and SBP sites may have also been related to uncertainty around whether nationwide waivers would be authorized to allow continued operation of summer meal programs. In June and July 2020, the total number of schools operating NSLP or SBP was about 2,600, and this increased to over 30,000 in the August and September time period (Appendix Table C.2). At the same time, the number of sites providing meals through the other Child Nutrition Programs also increased. The total number of sites operating SSO in August and September was almost double the number that operated the program in June and July. Similarly, the total number of sites operating SFSP increased by about 40 percent as the school year began. The number of outlets providing CACFP meals also increased by about 18 percent during this period. Despite these increases, the number of sites operating in September 2020 was still substantially lower than March 2020 (Appendix Table C.2).

Among States that provided data on use of the area eligibility nationwide waiver, 10 percent of SSO sites in operation in August were new area eligible sites. This increased to 18 percent in September. Seventeen percent of SFSP sites in operation in August were new area eligible sites. This increased to 26 percent in September. Among States that provided data on whether SSO and SFSP sites operated as open or closed, in August 86 percent of SSO and SFSP sites in operation were open sites, dropping to 73 percent in September (Appendix Table C.3).

# 2. More children and meals were served through NSLP and SBP, though SFSP and SSO continued to drive meal service

The increased number of sites serving Child Nutrition Program meals led to an increase in the number of children participating across all of the programs (Appendix Table C.2). Comparing the summer months to September 2020, the total number of children participating in NSLP, SBP, SSO, and SFSP doubled as SY 2020-2021 began (Figure II.11). Although the number of children participating in NSLP and SBP substantially increased during that period, SSO and SFSP continued to serve the most children. In September 2020, more than three-fourths of the almost 15 million children served through these programs were served by SSO or SFSP. Local program operators' continued use of SSO and SFSP to serve meals to children was directly related to the September issuance of COVID-19 Child Nutrition nationwide waivers that allowed the summer meal programs to be used during the school year. As shown in Figure II.11, despite these increases, participation across Child Nutrition Programs was still much lower in September 2020 than it had been in March 2020.

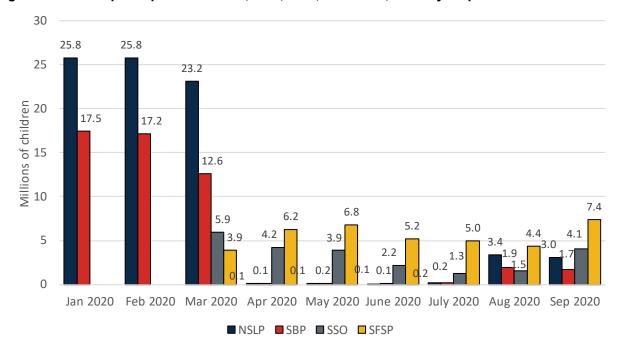
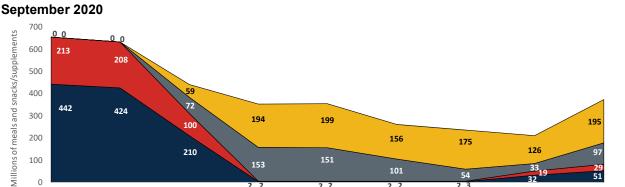


Figure II.11. Child participation in NSLP, SBP, SSO, and SFSP, January–September 2020

- Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2020.
- Note: participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals. Pennsylvania did not provide operating days or average daily meals for SFSP and is therefore excluded from SFSP participation data.

The predominant use of SFSP and SSO at the beginning of the school year was also reflected in the number of meals served. As shown in Figure II.12, local program operators continued serving most meals through SFSP and SSO, with NSLP and SBP making up a much smaller share of meals served.



2 2 May 2020

■ NSLP ■ SBP ■ SSO ■ SFSP

54

2 3 Jul 2020

**2 2** Jun 2020

Figure II.12. Meals and snacks/supplements served through NSLP, SBP, SSO, and SFSP, January-September 2020

Source: School Meals Operations Study, disaggregated FNS-10 or FNS-418 data from fiscal year 2020.

Apr 2020

0

Jan 2020

Feb 2020

Mar 2020

Sep 2020

Aug 2020

#### **3.** CACFP participation and meals served continued to increase but had not reached prepandemic levels by September

Although child participation in CACFP had not reached pre-pandemic levels by September 2020, total child participation in CACFP did increase each month from July through September. These increases were driven by changes in child participation in child care centers. Child participation in family day care homes changed minimally from July to September 2020, as shown in Figure II.13.

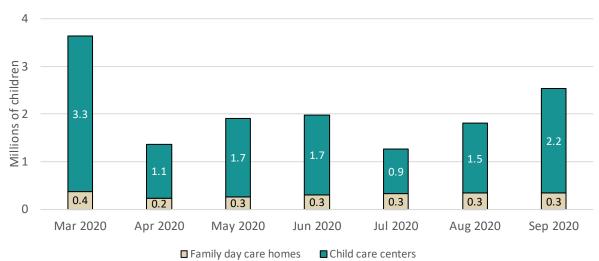


Figure II.13. Child participation in CACFP by outlet type, March–September 2020

Source: School Meals Operations Study, disaggregated FNS-44 data from fiscal year 2020.

Note: Fiscal Year 2020 Child and Adult Care Food Program data from the School Meals Operations Study are available for March through September 2020. Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals.

By September 2020, the number of meals served in CACFP was approaching the number served in March. This increase is reflected across most outlet types: child care centers served 70 million meals in March 2020, and 69 million in September 2020; family day care homes served 18 million meals in March 2020 and 17 million meals in September 2020, as shown in Figure II.14. Within the category of child care centers, the number of meals served in September in at-risk afterschool programs surpassed the number served in March, with about 15,000 breakfasts, 162,000 lunches, 8 million suppers, and 4 million snacks served that month. Head Start centers and emergency shelters showed the largest remaining deficit in number of meals served when comparing March and September (Appendix Table <u>C.7</u>).

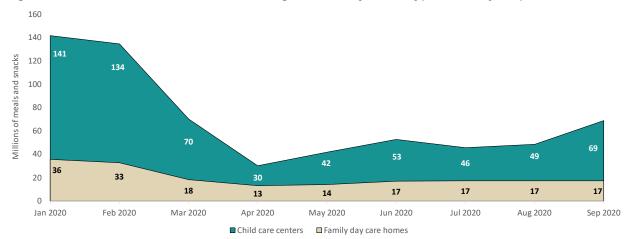


Figure II.14. Meals and snacks served through CACFP by outlet type, January–September 2020

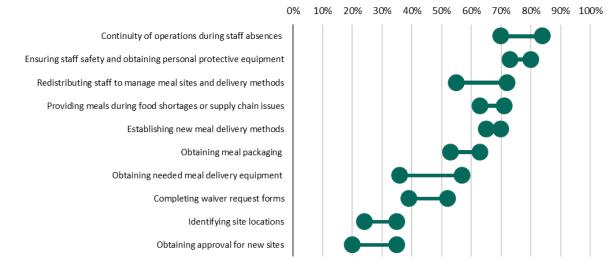
Source: January and February 2020 data are from U.S. Department of Agriculture Food and Nutrition Service Program Information Report (Keydata) for fiscal year 2019 - 2020. March – September data are from School Meals Operations Study fiscal year 2020 disaggregated FNS-44 data. This page has been left blank for double-sided copying.

# III. Program Operations and Financial Challenges During the Pandemic

With the onset of the COVID-19 pandemic, local program operators and State agencies faced a variety of operational challenges to providing meal service. About 50 percent of State agencies reported that more than half of SFAs operating NSLP, SBP, SSO, or SFSP, and institutions operating CACFP faced operational challenges providing meal service in the early months of the pandemic. Slightly fewer State agencies, about 40 percent, reported that more than half of non-SFA sponsors of SFSP faced such challenges (Appendix Table D.1).

State agencies most frequently reported that local program operators faced challenges related to staffing and safety issues, such as ensuring continuity of operations during staff absences or ensuring staff safety and obtaining personal protective equipment. The majority of State agencies also reported that redistributing staff to manage meal sites and delivery methods, establishing new meal delivery methods, and providing meals during food shortages or supply chain issues also presented challenges for local program operators during this time period (Appendix Table <u>D.2</u>). Figure III.1 shows the percentage of State agencies that reported each factor as contributing to operational challenges faced by local program operators providing meal service during the initial months of the COVID-19 pandemic. The range shown for each factor reflects variation across local program operator types, including SFAs operating NSLP, SBP, or SSO; SFAs operating SFSP; other sponsors operating SFSP; and institutions operating CACFP.

### Figure III.1. Percentage of State agencies reporting factors that contributed to local program operators' operational challenges providing meal service, March–September 2020



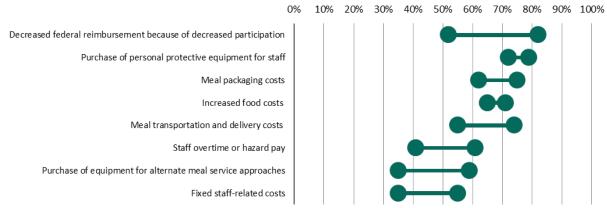
- Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.
- Note: The figure includes the percentage of State agencies reporting that each factor contributed to operational challenges faced by their local program operators in providing meal service from March through September 2020. The bars indicate the extent of variation in State agency responses by type of local program operator, including SFAs operating NSLP, SBP, or SSO; SFAs operating SFSP; other sponsors operating SFSP; and institutions operating CACFP.

Half of State agencies reported that operational challenges for local program operators in rural areas differed from those in urban or suburban areas during the March through September 2020 period. These State agencies reported that local program operators in rural areas experienced challenges with meal site access or distance to sites, supply chain issues, meal delivery, and staff availability (Appendix Table <u>D.3</u>).

About 60 percent of State agencies reported that more than half of SFAs operating NSLP, SBP, SSO, or SFSP, and institutions operating CACFP, also faced financial challenges providing meal service in the early months of the pandemic. Fewer State agencies, about 40 percent, reported that more than half of non-SFA sponsors of SFSP faced financial challenges (Appendix Table <u>D.4</u>).

State agencies most frequently reported that decreased Federal reimbursement resulting from decreased Child Nutrition Program participation as well as various costs related to serving meals during the pandemic contributed to financial challenges from March through September 2020. For example, consistent with the operational challenges local program operators experienced in trying to ensure the safety of their staff, State agencies most frequently reported that needing to purchase personal protective equipment for staff contributed to local program operators' financial challenges. State agencies also reported that meal packaging costs and meal transportation and delivery costs contributed to challenges, likely due to local program operators needing to find ways to serve meals to children outside of school and child care center buildings. Local program operators also experienced increased food costs, likely in part due to supply chain issues (Appendix Table <u>D.5</u>). Figure III.2 shows the percentage of State agencies that reported each factor as contributing to financial challenges faced by local program operators. The range shown for each factor reflects variation across local program operator types.

## Figure III.2. Percentage of State agencies reporting factors that contributed to local program operators' financial challenges providing meal service, March–September 2020



- Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.
- Note: The figure includes the percentage of State agencies reporting that each factor contributed to financial challenges faced by their local program operators in providing meal service from March through September 2020. The bars indicate the extent of variation in State agency responses by type of local program operator, including SFAs operating NSLP, SBP, or SSO; SFAs operating SFSP; other sponsors operating SFSP; and institutions operating CACFP.

Almost 70 percent of State agencies reported that financial challenges for local program operators in rural areas differed from those in urban or suburban areas during the March through September 2020 period. Those State agencies reported that rural local program operators faced higher transportation and food costs, and that participation decreases affected the finances of rural local program operators more negatively than other local program operators (Appendix Table <u>D.6</u>).

State agencies themselves also experienced operational and, to some extent, financial challenges during the early months of the pandemic. About three-fourths of State agencies reported experiencing operational challenges, and about two-thirds reported challenges using and implementing COVID-19 Child Nutrition nationwide waivers (Appendix Table D.7). State agencies most commonly reported that slow or unclear guidance from FNS contributed to the operational challenges they faced during this time period. Needing to redesign their approaches to monitoring the Child Nutrition Programs, such as switching from onsite monitoring to virtual, also presented a challenge for State agencies (Appendix Table D.8). Thirty percent of State agencies reported that they were able to overcome the challenges they faced with the COVID-19 Child Nutrition waivers. Thirty-seven percent of State agencies, however, reported that they were unable to overcome certain challenges, such as slow or unclear guidance from FNS, the time and effort needed to collect waiver data, and staff burden (Appendix Table D.9). Less than one quarter of State agencies reported experiencing financial challenges during the March through September 2020 period. These challenges were most commonly caused by increased staff hours and IT systems changes (Appendix Table D.10).

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### IV. Use of COVID-19 Child Nutrition Nationwide Waivers to Improve Services to Children

When the pandemic began in March 2020, with the authority provided by the FFCRA, FNS issued COVID-19 Child Nutrition nationwide waivers that provided States and local program operators with flexibilities to help them serve meals under the Child Nutrition Programs with appropriate safety measures to children who were no longer routinely being educated in school buildings due to the pandemic. The key Child Nutrition Programs used to provide meals to children during the early pandemic months included the NSLP, SBP, SSO, SFSP, and CACFP. This chapter describes findings on use of the nationwide waivers, meal site characteristics, meal service methods, and how waivers improved service to children during the March through September 2020 period.

# A. Local program operators more frequently used the waivers for SSO and SFSP than for NSLP, SBP, and CACFP from March through September 2020

Consistent with the increased use of SSO and SFSP for meal service between March and September 2020, local program operators most frequently used the COVID-19 Child Nutrition nationwide waivers that eased children's access to meals served through these programs. State agencies reported that over three-fourths of local program operators used the SSO/SFSP **Unanticipated School Closure Operations** waiver (Appendix Table E.2), which made it easier for operators to use these programs to provide meal service in the early months of the pandemic. The Non-congregate waiver, which allowed meals to be served and consumed individually, rather than in group settings, was used by 78% of local program operators that provided meals through SSO and SFSP, and it was among the most frequently used waivers

#### Most used waivers

SSO/SFSP Unanticipated School Closure Operations – Allowed local program operators to continue operating SSO and SFSP under unanticipated school closure requirements in May and June 2020 without meeting the administrative requirements for operating these programs in the summer

**Non-congregate** – Allowed meals to be served and consumed in non-group settings

**Parent and Guardian Pick-Up** – Allowed parents and guardians to pick-up meals and bring them home to their children

**Meal Service Time Flexibility** – Allowed meals to be served to kids outside traditional times to maximize flexibility for meal pick-up

across all Child Nutrition Programs during this time period. More than half of the local program operators providing meals through SSO and SFSP also used additional waivers that allowed parents and guardians to pick up several meals for their children at one time without requiring that their children be present at the meal site—the **Parent and Guardian Pick-Up** waiver and the **Meal Service Time Flexibility** waivers. These waivers were also commonly used by local program operators providing meals through other Child Nutrition Programs during this period.

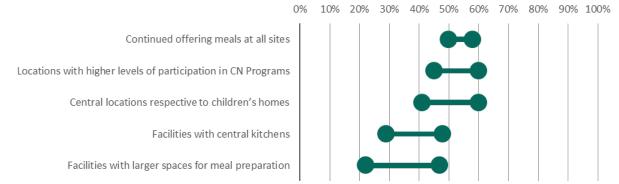
Local program operators that served meals through NSLP, SBP, and CACFP used the waivers less frequently compared to those serving SFSP and SSO meals. Many of the waivers these local program operators commonly used provided flexibilities related to program administration, such as waivers that allowed more time to meet required deadlines. For example, many SFAs that operated NSLP and SBP used the **School Wellness Policy** waiver, which provided an additional year to conduct an assessment and report on compliance with local school wellness policy requirements. The **Community Eligibility Provision (CEP) Deadlines** waiver was also used by many SFAs. This waiver provided more time to

meet required election and reporting deadlines for CEP, a policy option that allows high poverty schools and districts to serve breakfast and lunch at no cost to all enrolled students. Local program operators that operated CACFP were the least likely to use available waivers; among this group, the **CACFP Monitoring for Sponsors** waiver, which waived certain monitoring requirements for CACFP sponsoring organizations, was the most frequently used (Appendix Tables <u>E.1</u> and <u>E.2</u>). Appendix <u>E</u> describes the use and the impact of waivers related to program administration in all of the Child Nutrition programs.

# B. Because of COVID-19, meal service generally moved outside of school and daycare buildings during March–September 2020

As school and daycare buildings closed in response to the public health emergency, meal service generally moved outside of those buildings during the March through September 2020 period. State agencies reported that local program operators most frequently established sites in locations that were near children's homes or in locations where more children participated in Child Nutrition Programs. State agencies also reported that many local program operators continued offering meals at all sites within the community, such as SFAs that offered meals to be picked up at all of the schools they served during the school year (Appendix Tables E.3, E.4, and E.5). Figure IV.1 shows the percentage of State agencies reporting that the majority of local program operators providing meals during this time period established meal sites with certain characteristics. The range shown for each characteristic reflects variation across local program operator types, including SFAs operating NSLP, SBP, or SSO; sponsors operating SFSP; and institutions operating CACFP.

### Figure IV.1. Percentage of State agencies reporting that the majority of local program operators established meal sites with certain characteristics, March–September 2020



- Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.
- Note: The figure includes the percentage of State agencies reporting that about half, more than half, or all local program operators established meal sites with each characteristic from March through September 2020. The bars indicate the extent of variation in State agency responses by type of local program operator, including SFAs operating NSLP, SBP, or SSO; sponsors operating SFSP; and institutions operating CACFP.

Because many sites operating from March through September 2020 provided SSO or SFSP meals, meals served at these sites were provided to all children for free. SSO and SFSP meals may be served at open or closed sites. Open sites serve meals to all children from the community on a first-come, first-served basis, while closed sites serve meals to children enrolled in a program at the site. The majority of SFSP and

SSO sites that operated between March and September 2020 operated as open sites; closed sites made up only 20 percent of sites operating during that time period (Appendix Table  $\underline{E.6}$ ).

The high proportion of open sites during this period was likely related, in part, to local program operators' use of the **SFSP/SSO Area Eligibility** waiver, which provided flexibility for establishing open sites (Appendix Table E.2). Under Federal rules, open sites are allowed to operate in an area where at least half of the children are eligible for free or reduced-price school meals, or when households have income at or below 185 percent of Federal poverty guidelines. However, the **SFSP/SSO Area Eligibility** waiver provided flexibility with this requirement and indicated that open sites should be targeted to children who were previously eligible or newly eligible for Child Nutrition Program benefits due to the economic impacts of COVID-19. State agencies reported that the methods used to identify new sites varied across SFAs that used the waiver for SSO and sponsors that used it for SFSP. For example, SFAs most frequently identified new SSO area eligible sites as those that had been area eligible in prior years, while sponsors most frequently targeted near-eligible sites as new SFSP area eligible sites, such as those in areas where 40 percent of children, instead of the standard 50 percent, were eligible for free or reduced-price meals (Appendix Table <u>E.7</u>).

## C. Local program operators used a variety of new and alternative meal delivery methods and options to serve children from March through September 2020

The start of the pandemic, and subsequent shift to remote learning in many areas in spring 2020, forced local program operators to adjust how they provided meals to children who were no longer routinely being educated in school buildings or receiving care in child care centers and family day care homes. Through use of the COVID-19 Child Nutrition nationwide waivers, various alternative methods were used to distribute meals to children. The majority of State agencies reported that more than half of their local program operators implemented a curbside meal pick-up or drive through service for families to obtain children's meals during the March through September 2020 period, and that this was the

#### Most used meal delivery methods

- Curbside pick-up/ drive through service \*
- Walk-up sites at schools, centers, or other buildings

#### Most used alternative meal options

- Two to three days of meals at one time\*
- Full week (five days) of meals at one time\*

\* Most effective methods for providing the greatest number of meals to the greatest number of children, reported by State agencies

most effective method for providing the greatest number of meals to the greatest number of children. Over 40 percent of State agencies also reported that more than half of SFAs operating NSLP, SBP, or SSO, and sponsors operating SFSP, offered walk-up sites at schools, child care centers, or other buildings, which was one of the least costly meal service methods used during this period. A smaller percentage of State agencies reported that walk-up sites were offered by the majority of CACFP institutions. State agencies also reported that mobile sites at which a bus or van delivered meals at pre-set times, and meal delivery through stops at individual homes, were the most costly meal delivery methods, and were less frequently used by local program operators (Appendix Tables <u>E.8</u>, <u>E.9</u>, and <u>E.10</u>). Also, through use of the waivers, local program operators were able to provide multiple meals at one time to those picking up children's meals. About 30 percent of State agencies reported that more than half of SFAs operating NSLP, SBP, or SSO, and sponsors operating SFSP, provided two to three days' worth of meals at one time. About one fourth of State agencies also reported that more than half of these local program operators provided a full week of meals at one-time. State agencies reported both of these approaches as among the most effective methods for serving the greatest number of meals to the greatest number of children. However, few State agencies reported that the majority of institutions operating CACFP provided multiple meals at one time. In addition, State agencies reported that local program operators less frequently provided weekend meals, bulk food packages,<sup>7</sup> or shelf-stable meals (Appendix Tables <u>E.8</u> and <u>E.9</u>).

Local program operators must report the number of meals they serve to children in each Child Nutrition Program to their State agency in order to receive meal reimbursements from USDA. During the March through September 2020 period, local program operators most frequently used paper rosters to count meals served. Fewer used a standard point of service system, such as the terminals typically used in a cafeteria; clickers; or mobile technology, like tablets or laptops, during this time period (Appendix Table  $\underline{E.8}$ ).

In traditional meal service, a child who is present at a school or site receives a meal; however, during the March through September 2020 period, the Parent and Guardian Pick-Up waiver allowed parents to pick up meals without their children present in order to minimize potential exposure to COVID-19. Local program operators that used this waiver were required to ensure that duplicate meals were not provided to any child and that meals were distributed only to parents and guardians of eligible children. To ensure duplicate meals were not distributed, the majority of local program operators notified parents and guardians picking up meals that children were not eligible to receive duplicate meals and requested parents and guardians provide their children's names or other identifying information when picking up meals. There was some variation in how local program operators for different Child Nutrition Programs ensured meals were only distributed to eligible children. For instance, SFAs providing meals through NSLP, SBP, or SSO most frequently requested that parents or guardians provide the number of children for whom they were picking up meals. SFSP sponsors and CACFP institutions used this approach with slightly less frequency; they also posted signage to indicate to parents and guardians who was eligible to pick up and receive meals. Some SFSP sponsors and CACFP institutions also requested children's information, like names, ages, dates of birth, or grade levels, from parents and guardians when they picked up their children's meals (Appendix Tables E.11 and E.12).

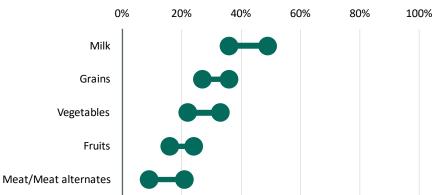
Under Federal rules, local program operators must serve meals that meet certain requirements, such as those related to meal components. For example, lunches served through SSO have to include servings of milk, grains, vegetables, fruit, and meat or meat alternates that meet certain nutritional and portion size requirements. However, COVID-19 and subsequent supply chain disruptions affected the availability of certain foods for meals. The **Meal Pattern Flexibility** waiver, which was used by local program operators operating each program in over two-thirds of States from March through September 2020, allowed local program operators to modify meal components served when needed. This waiver was most used among SFAs, with nearly half of those providing meal service during this time using it for SSO. In contrast, few sponsors used the waiver for SFSP, which is not surprising; while the SFSP meal pattern is similar to the SSO pattern, it includes fewer requirements that must be met for meals to be reimbursable (Appendix Tables <u>E.1</u> and <u>E.2</u>).

Figure IV.2 shows the percentage of State agencies reporting that local program operators used the **Meal Pattern Flexibility** waiver to waive meal component requirements in each Child Nutrition Program. State agencies most frequently reported that local program operators waived milk requirements, with half of State agencies reporting that sponsors using the waiver waived milk requirements for SFSP meals, and

<sup>&</sup>lt;sup>7</sup> Bulk food packages are food packages that contain one or more items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

over one-third of State agencies reporting that SFAs did so for SSO meals. This was followed by grains and vegetables; about one-third of State agencies reported that local program operators using the waiver waived the grains and vegetables requirements for SFSP and SSO meals. Fewer local program operators waived requirements for fruits and meat or meat alternatives. For NSLP and SSO meals, local program operators are also required to serve certain amounts of specific vegetable subgroups—dark green, red/orange, starchy, legumes, and other vegetables—to meet the weekly meal pattern requirements. State agencies most frequently reported that local program operators using the **Meal Pattern Flexibility** waiver waived requirements for legumes, and dark green and starchy vegetables; however, less than 20 percent of State agencies reported that local program operators waived requirements for any specific vegetable subgroup. Across all Child Nutrition Programs, most State agencies reported that less than half of local program operators used the waiver for multiple food components (Appendix Tables <u>E.13</u> and <u>E.14</u>).

# Figure IV.2. Percentage of State agencies in which local program operators used the Meal Pattern Flexibility waiver to waive meal component requirements in each Child Nutrition Program, March–September 2020



- Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.
- Note: The figure includes the percentage of State agencies reporting that local program operators using the Meal Pattern Flexibility waiver waived meal components in each Child Nutrition Program. The bars indicate the extent of variation in State agency responses by Program, including NSLP, SBP, SSO, SFSP, and CACFP.

#### D. State agencies consistently reported that use of the COVID-19 Child Nutrition nationwide waivers improved services to children from March through September 2020

State agencies were required by statute to report on whether and how use of the COVID-19 Child Nutrition nationwide waivers improved services to children. Across all waivers that eased children's access to meals from March through September 2020, and for all programs which used them, State agencies overwhelmingly reported that the waivers improved services to children, and that they did so in multiple ways. For example, across Child Nutrition programs, most State agencies reported the access-focused waivers<sup>8</sup> improved services to children by reducing barriers to receiving meals, allowing pick-up of multiple meals at one time, and improving safety for children. About two-thirds of State agencies also said the waivers increased alternative delivery methods and increased participation among children

<sup>&</sup>lt;sup>8</sup> Waivers issues in an effort to ease children's access to meals. These waivers include Meal Service Time Flexibility, Non-congregate, Afterschool Activity Requirements in NSLP/CACFP, Meal Pattern Flexibility, Parent Pick-up, SFSP Offer vs. Serve Flexibilities, SFSP/SSO Meal Service Time, and SFSP/SSO Area Eligibility.

(Appendix Table  $\underline{E.15}$ ). Figure IV.3 shows the percentage of State agencies reporting that the access-focused waivers improved services to children in certain ways.

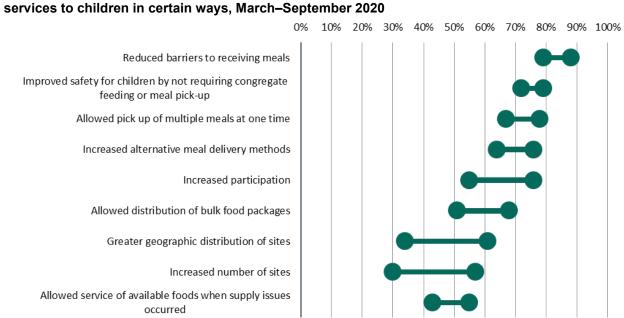


Figure IV.3. Percentage of State agencies reporting that access-focused waivers improved services to children in certain ways, March–September 2020

- Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.
- Note: The figure includes the average percentage of State agencies, across all Child Nutrition COVID-19 nationwide waivers used from March through September 2020 to ease access to meals, that reported the waivers improved services to children in certain ways. These waivers include Meal Service Time Flexibility, Non-congregate, Afterschool Activity Requirements in NSLP/CACFP, Meal Pattern Flexibility, Parent Pick-up, SFSP Offer vs. Serve Flexibilities, SFSP/SSO Meal Service Time, and SFSP/SSO Area Eligibility. The bars indicate the extent of variation in State agency responses by Program, including NSLP, SBP, SSO, SFSP, and CACFP.

Certain waivers led to specific improvements related to the purpose of the waiver. For example, most State agencies that used the **Meal Pattern Flexibility** waiver reported that it allowed service of available foods when supply issues occurred. Similarly, nearly all State agencies that used the **SFSP/SSO Area Eligibility** waiver reported that it increased the number of meal sites and resulted in greater geographic distribution of sites, outcomes which are consistent with the goals of the waiver. State agencies also reported that the Area Eligibility waiver reduced barriers to receiving meals and increased participation among children.

State agencies in which local program operators used the **Non-congregate**, **Parent and Guardian Pick-Up**, **Afterschool Activity Requirements in NSLP/CACFP**, and **Meal Service Time Flexibility** waivers reported that these waivers improved safety for children by not requiring congregate feeding or meal pick-up and reduced barriers to children receiving meals. State agencies reported that the **Non-congregate** and **Meal Service Time Flexibility** waivers also allowed pick-up of multiple meals at one time, and, for SSO, SFSP, and CACFP specifically, increased children's participation in the programs and increased the availability of alternative meal delivery methods (Appendix Tables <u>E.16</u>, <u>E.17</u>, <u>E.18</u>, <u>E.19</u>, and <u>E.20</u>).

### V. Overview of the Next Study in the Series

The COVID-19 pandemic public health emergency has continued to affect Child Nutrition Program operations, and as a result, how the programs have adjusted during the pandemic will continue to be a central focus. The next report in this study series is expected to be released in September 2023 and will present information on data collection conducted between December 2021 and May 2022. This data collection focused on gathering information about Child Nutrition Program operations during SY 2020-2021 and summer 2021. The study also continued to collect statutorily required information on the COVID-19 Child Nutrition nationwide waivers approved for use during that period. While some waivers were authorized for use for the first time during that period, many of the waivers authorized for use during the March through September 2020 period were extended into SY 2020-2021 and summer 2021. As a result, the second year of this study collected statutorily required data on both the newly authorized waivers and waiver extensions, as well as the additional requirements in place for certain waivers.

The second year of data collection for this study again involved obtaining survey and administrative data from the 67 State agencies in the 50 States, District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands that administer NSLP, SBP, SSO, SFSP, and CACFP. The survey of State agencies gathered information to address the reporting requirements for the COVID-19 Child Nutrition nationwide waivers, as well as information on State agencies' operational and financial challenges and their administration of the Child Nutrition Emergency Operational Costs Reimbursement Programs. These Programs provided payments to local program operators whose revenues declined or were temporarily interrupted during the early months of the pandemic due to COVID-19. The administrative data collection gathered data on program participation and meals served in the Child Nutrition Programs during SY 2020-2021 and summer 2021.

The second year of this study also included a survey of a nationally representative sample of SFAs. The survey gathered information on Child Nutrition Program operations and challenges during SYs 2020-2021 and 2021-2022, use of COVID-19 Child Nutrition nationwide waivers, and the financial impacts of the COVID-19 pandemic.

### References

- Food and Nutrition Service. "COVID-19 Congregate Meal Waivers & Q&As on Summer Meal Delivery Using Existing Authority." 2020a. Available at <u>https://www.fns.usda.gov/sfsp/covid-19/covid-19-meal-delivery</u>. Accessed June 10, 2022.
- Food and Nutrition Service. "Program Information Report (Keydata) U.S. Summary, FY 2019 FY 2020." 2020b. Washington, DC: U.S. Department of Agriculture, Food and Nutrition Service, 2020. Data file provided by the Food and Nutrition Service.

Appendix A COVID-19 Child Nutrition Nationwide Waivers

When the pandemic began in March 2020, the FFCRA provided FNS with the authority to establish waivers for the purpose of providing meals under the Child Nutrition Programs with appropriate safety measures. With this authority, FNS issued nationwide waivers of certain Child Nutrition Program rules that provided States and local program operators with flexibilities to help them serve meals to children who were no longer routinely being educated in school buildings due to the pandemic. Table A.1 lists the COVID-19 Child Nutrition nationwide waivers that FNS authorized for use by State agencies and local program operators from March through September 2020.

### Table A.1. COVID-19 Child Nutrition nationwide waivers authorized for use from March through September 2020

Waiver name	Full waiver policy memo name	Initial authorization date	Focus	Description of waiver
Meal Service Time Flexibility	COVID-19: Child Nutrition Response #1: Nationwide Waiver to Allow Meal Service Time Flexibility in the Child Nutrition Programs	March 20, 2020	Access	Allowed meals to be served to kids outside traditional times to maximize flexibility for meal pick-up.
Non- congregate	COVID-19: Child Nutrition Response #2: Nationwide Waiver to Allow Non- congregate Feeding in the Child Nutrition Programs	March 20, 2020	Access	Allowed meals to be served and consumed in non-group settings.
Afterschool Activity Requirements in NSLP/CACFP	COVID-19: Child Nutrition Response #3: Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs	March 20, 2020	Access	Allowed afterschool meals and snacks to be served outside the standard afterschool setting.
Meal Pattern Flexibility	COVID-19: Child Nutrition Response #4: Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs	March 25, 2020	Access	Provided the flexibility to serve meals that do not meet specified meal pattern requirements when needed.
Parent Pick- up	COVID-19: Child Nutrition Response #5: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children	March 25, 2020	Access	Allowed parents and guardians to pick-up meals and bring them home to their children.
CEP Deadlines in NSLP/SBP	COVID-19: Child Nutrition Response #6: Nationwide Waiver of Community Eligibility Provision Deadlines in the National School Lunch and School Breakfast Programs	March 25, 2020	Administrative	Provided more time to meet required election and reporting deadlines for CEP.
CACFP Monitoring for Sponsors	COVID-19: Child Nutrition Response #7: Nationwide Waiver of Monitoring Requirements for Sponsors in the Child and Adult Care Food Program	March 27, 2020	Administrative	Provided flexibilities for certain monitoring and review requirements for sponsors participating in CACFP.

Waiver name	Full waiver policy memo name	Initial authorization date	Focus	Description of waiver
CACFP Onsite Monitoring Requirements for State agencies	COVID-19: Child Nutrition Response #8: Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Child and Adult Care Food Program	March 27, 2020	State Administrative	Provided flexibilities for certain monitoring and review requirements for CACFP.
School Meals Onsite Monitoring - Revised	COVID-19: Child Nutrition Response #9: Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs - Revised	March 27, 2020	Administrative and State Administrative	Provided flexibilities for certain monitoring and review requirements for school meals programs.
SFSP Onsite Monitoring for Sponsors	COVID-19: Child Nutrition Response #10: Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program	March 27, 2020	Administrative	Provided flexibilities for certain monitoring and review requirements for sponsors participating in SFSP.
SFSP Onsite Monitoring Requirements for State agencies	COVID-19: Child Nutrition Response #11: Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Summer Food Service Program	March 27, 2020	State Administrative	Provides flexibilities for certain monitoring requirements for State agencies administering, and sponsors operating, SFSP
60-Day Reporting Requirements	COVID-19: Child Nutrition Response #12: Nationwide Waiver of 60 Day Reporting Requirements for January and February 2020	April 1, 2020	Administrative	Provided new deadline for 60- day reporting requirements.
SFSP/SSO Area Eligibility for Closed Enrolled Sites	COVID-19: Child Nutrition Response #14: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in SFSP and the NSLP Seamless Summer Option	April 21, 2020	Administrative	Allowed sponsors to determine closed enrolled SSO and SFSP site eligibility through area eligibility.
SFSP First Week Site Visits	COVID-19: Child Nutrition Response #15: Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program	April 21, 2020	Administrative	Provided flexibility for requirement to visit SFSP sites during first week of operation.
SFSP Offer vs. Serve Flexibilities	COVID-19: Child Nutrition Response #16: Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the Summer Food Service Program	April 30, 2020	Access	Provided the flexibility to serve meals without using offer versus serve.

Waiver name	Full waiver policy memo name	Initial authorization date	Focus	Description of waiver
SFSP/SSO Meal Service Time	COVID-19: Child Nutrition Response #17: Nationwide Waiver of Meal Service Time Restrictions in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option	April 21, 2020	Access	Allowed meals to be served to kids outside traditional times to maximize flexibility for meal pick-up.
School Wellness Policy Assessments	COVID-19: Child Nutrition Response #18: Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the NSLP and SBP	April 23, 2020	Administrative	Provided a new first triennial assessment deadline.
NSLP/SFSP Food Service Management Contract Duration	COVID-19: Child Nutrition Response #19: Nationwide Waiver of Food Service Management Contract Duration in the National School Lunch Program and Summer Food Service Program	April 24, 2020	Admin	Allowed extension of FSMC contracts.
CACFP Annual Review Requirements for State agencies	COVID-19: Child Nutrition Response #20: Nationwide Waiver of Annual Review Requirements for State Agencies in the Child and Adult Care Food Program	April 24, 2020	State Administrative	Provided flexibility for conducting annual reviews of CACFP sites.
SFSP/SSO Unanticipated School Closure Operations	COVID-19: Child Nutrition Response #21: Nationwide Waiver to Extend Unanticipated School Closure Operations	April 27, 2020	Administrative	Allowed local program operators to continue operating SSO and SFSP under unanticipated school closure requirements in May and June 2020 without meeting the administrative requirements for operating these programs in the summer
SFSP/SSO Area Eligibility Source: https:	COVID-19: Child Nutrition Response #32: Nationwide Waiver to Extend Area Eligibility Waivers //www.fns.usda.gov/fns-disaster	June 10, 2020	Access	Allows sponsors, regardless of their location, to operate open SSO and SFSP sites.

Source: <u>https://www.fns.usda.gov/fns-disaster-assistance/fns-responds-covid-19/child-nutrition-covid-19-waivers</u> Note: Focus reflects the primary target or goal of the waiver, either improving children's access to meals or

Note: Focus reflects the primary target or goal of the waiver, either improving children's access to me providing flexibility in Child Nutrition program administration.

Appendix B Data Collection Methods and Data Quality

Data collection for this report involved obtaining survey and administrative data from the 67 State agencies in the 50 States, District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands that administer NSLP, SBP, SSO, SFSP, and CACFP.<sup>9</sup> In some States, a single agency completed the survey and provided administrative data; in other States, the data were provided by multiple agencies. The data collection period began in March 2021. This appendix provides additional information about the report's data collection process and limitations of the data.

#### A. Survey data collection

The State agency survey was administered via the web and fielded from March 18 through May 31, 2021.

#### 1. Survey content

The survey collected information on the FFCRA statutory reporting requirements for the 21 COVID-19 Child Nutrition nationwide waivers that FNS authorized for use from March through September 2020 during the federally declared COVID-19 public health emergency. The survey also requested that, if prior to issuance of the nationwide waivers, the State agency received an individual Child Nutrition waiver that was later addressed by a nationwide waiver on the same subject, the State agencies should consider those waivers when responding to questions about the related nationwide waiver.

FFCRA requires each State agency that oversees the Child Nutrition Programs and uses a nationwide waiver to report on: (1) the use of each waiver by the State agency and local program operators, and (2) a description of whether and how each waiver resulted in improved services to children. In addition, three waivers have additional reporting requirements. In FNS guidance on these waivers, State agencies were told to report:

- For the Nationwide Waiver to Extend Area Eligibility waivers, how new meal sites were selected to serve children who were previously eligible or newly eligible for program benefits due to the economic impacts of COVID-19;
- For the Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children, plans taken to ensure that meals were distributed only to parents or guardians of eligible children and that duplicate meals were not distributed to any child; and
- For the Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs, information on when and where this waiver was in effect and for what food components.

Full participation in the SMO Study satisfied State agencies' reporting requirements for the 21 COVID-19 Child Nutrition nationwide waivers. State agencies were required to respond to all survey questions, and questions included a "don't know" response option. The survey also included questions about Child Nutrition Program meal service operations during March through September 2020, as well as financial and operational challenges that State agencies and local program operators experienced during that period.

#### 2. Survey data quality

All State agencies completed the survey. Respondents were generally able to provide substantive answers to the survey questions, and they were typically able to find a response that fit their situation among the

<sup>&</sup>lt;sup>9</sup> Because SMO is focused on Child Nutrition Programs, it did not collect information on CACFP operations in adult day care centers.

options provided, rather than having to enter a response in the "other-specify" response option. The prevalence of "don't know" responses varied greatly by SA, waiver survey section, and survey question. For example, the prevalence of don't know responses was greater for certain monitoring waiver survey sections, as well as for questions regarding specific monitoring methods used or methods used to comply with the additional requirements of the Parent/Guardian Pick Up waiver.

Survey data collected from State agencies on the Meal Pattern Flexibility Waiver has certain limitations, primarily due to incomplete data. In the survey, State agencies that collected required data on meal components waived in each Child Nutrition Program by local program operators using the waiver were asked to submit a file with that data. Those who were able to submit a file skipped a set of survey questions on the meal components waived. As State agencies submitted their files, the study team reviewed the files for completeness and conducted follow-up as needed. Follow-up efforts spanned April through October 2021. However, after follow-up, the extent to which required data were provided by State agencies varied, affecting data completeness and quality. About 10 percent of State agencies with local program operators that used the waiver had incomplete data on which meal components were waived.

In addition, through our analysis of the percentage of local program operators that used each waiver in each Child Nutrition Program, we identified data quality issues with some State agencies' survey responses. Specifically, when comparing the number of local program operators that State agencies reported in the survey as having used each waiver in each Program with the number of local program operators that operated the Programs from March through September 2020 in State administrative data, the study team identified inconsistencies in the data collected from some State agencies across the two sources. For example, in the survey, some State agencies reported that a greater number of local program operators used a waiver in a Child Nutrition Program than the total number of local program operators that operated that Program from March through September 2020, according to State administrative data. local program operators these data quality issues were not widespread, they limit the usefulness of calculating the percentages of local program operators that used waivers during this period.

#### B. Administrative data collection

The administrative data collection began in mid-March 2021. Most State agencies had provided data by July 2021, and all State agencies had provided data by September 2021.

#### 1. Administrative data content

Each month, State agencies report to FNS their Child Nutrition Program participation data aggregated at the State level. State agencies report NSLP, SBP, and SSO data on the FNS-10, Report of School Program Operations; SFSP data on the FNS-418, Report of the Summer Food Service Program for Children; and CACFP data on the FNS-44, Report of the Child and Adult Care Food Program. The data collected on these forms were the basis of the SMO administrative data request to State agencies, although SMO collected these data aggregated at the site or local program operator level, depending on the data available at the State agency.

The administrative data collected during SMO Year 1 included school-level FY 2020 FNS-10 data, covering the 12 months from October 2019 through September 2020; site-level FNS-418 data for the months of March through September 2020; and outlet-level FNS-44 data for the months of March through

September 2020. When data were not available from State agencies at these levels, the study team collected SFA-level FNS-10 data, sponsor-level FNS-418 data, and institution-level FNS-44 data.

In addition to the data elements regularly collected on these forms, SMO requested identifying information and key characteristics of each school, site, or outlet, or SFA, sponsor, or institution; and data consistent with what was reported to FNS in the Remarks section of these forms from March through September 2020. Specifically, FNS memo SP-16-2020, CACFP 10-2020, SFSP 09-2020 required that certain information on schools, sites, and outlets operating during the pandemic be provided in the Remarks section of the FNS-10, FNS-418, and FNS-44 for the monthly data collections beginning with March 2020.

#### 2. Administrative data quality

Overall, State agencies were generally able to provide the requested administrative data, though the level of disaggregation and level of completeness varied. Regarding disaggregation, most State agencies provided some or all of the requested data at the lower level of disaggregation for each form—school, site, or outlet.

From April through October 2021, the study team reviewed the completeness of the administrative data and conducted follow-up with State agencies to request missing data and to clarify data elements or inconsistencies. Some State agencies were unable to provide certain data elements, which affected the completeness of the data. Data elements commonly missing across the three forms included those related to commodity meals or foods and Remarks section data that FNS requested States submit on operations during the pandemic. Some of the most commonly missing data elements included: (1) on the FNS-10, indicators of whether the site operated SSO or NSLP/SBP during a given month and whether each SSO site operated as open or closed; and (2) on the FNS-418, sponsor type and an indicator of whether the site was made area eligible under the COVID-19 Child Nutrition nationwide waiver.

Data on average daily meals and average daily attendance also were frequently missing across the forms or determined to be inaccurate, based on FNS instructions for calculating these data elements. Although FNS does not collect data on the actual number of children participating in the Programs from State agencies each month, the agency requires State agencies to report on average daily meals or attendance in each Program. FNS uses these data as a proxy for children participating. As a result, these data elements are key to addressing the SMO research questions related to student and child participation. To address the missing or inaccurate data received from State agencies, the study team produced calculated versions of these variables for the purposes of improving the quality and reliability of the analysis.<sup>10</sup>

<sup>&</sup>lt;sup>10</sup> Student and child participation were calculated by dividing the meal count by operating days. If the State agency did not provide operating days but did provide average daily meals or attendance, student and child participation was set equal to the SA-provided average daily meals or attendance.

Appendix C Chapter II Supplemental Tables

	Oct. 2019 (#)	Apr. 2020 (#)	Percent change
All schools participating in both NSLP and SBP	75,933	2,077	-97
Public schools	71,465	428	-99
Private schools	2,016	22	-99
Residential childcare institutions	1,789	1,575	-12
All schools participating in NSLP only	6,181	123	-98
Public schools	4,470	73	-98
Private schools	1,586	15	-99
Residential childcare institutions	49	33	-33
All schools participating in SBP only	168	19	-89
Public schools	139	6	-96
Private schools	7	1	-86
Residential childcare institutions	8	12	50

#### Table C.1. Change school participation in NSLP and SBP from October 2019 to April 2020

Source: School Meals Operations Study, disaggregated FNS-10 data from fiscal year 2020.

Note: Forty-four States provided school-level data and school type. Schools that participated in SSO in April 2020 are not included in this table.

	Oct. 2019 (#)	Mar. 2020 [# (% change)]	Apr. 2020 [# (% change)]	May 2020 [# (% change)]	Jun. 2020 [# (% change)]	Jul. 2020 [# (% change)]	Aug. 2020 [# (% change)]	Sep. 2020 [# (% change)]	Apr. to May 2020 (undupli- cated total number of schools or sites)	Jun. to Jul. 2020 (undupli- cated total number of schools or sites)	Aug. to Sep. 2020 (undupli- cated total number of schools or sites)
Schools operating NSLP N = 44	82,114	79,513 (-3%)	2,477 (-97%)	2,369 (-4%)	2,170 (-8%)	2,307 (6%)	27,973 (1,113%)	23,158 (-17%)	2,564	2,652	33,022
Schools operating SBP N = 44	76,101	69,529 (-9%)	2,359 (-97%)	2,276 (-4%)	2,118 (-7%)	2,232 (5%)	26,102 (1,069%)	21,244 (-19%)	2,442	2,551	30,306
Schools operating SSO N = 33	-	22,785	16,910 (-26%)	16,015 (-5%)	11,159 (-30%)	5,666 (-49%)	8,083 (43%)	21,548 (167%)	17,415	11,602	22,486
Sites operating SFSP N = 45		19,928	22,803 (14%)	24,292 (7%)	28,648 (18%)	31,161 (9%)	29,460 (-5%)	39,728 (35%)	25,968	36,292	51,902
Total <sup>a</sup> N = 49	82,282	125,146 (34%)	42,360 (-66%)	42,833 (1%)	42,173 (-2%)	39,294 (-7%)	66,466 (69%)	86,354 (30%)	46,141	50,776	109,262

Table C.2. Schools or sites providing meals through NSLP, SBP, SSO, or SFSP in October 2019 from March through September 2020 and monthly percentage change

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2020.

Note: The number of schools (NSLP, SBP, and SSO) and sites (SFSP) operating during each month is calculated for each program. Generally, if the same school or site operated in multiple programs, it is counted twice in the total. However, if a school shifted operations between NSLP and SSO in a given month, it is included only in the count of SSO sites for that month. Shaded cells are not applicable.

<sup>a</sup> Because some schools participated in both NSLP and SBP, the totals do not equal the sum of the rows above.

	·····, ····			5			
	Mar. 2020	Apr. 2020	May 2020	Jun. 2020	Jul. 2020	Aug. 2020	Sep. 2020
SSO							
New area eligible							
Number of states	N = 22	N = 22	N = 22	N = 22	N = 17	N = 19	N = 21
Percentage of sites	16	17	17	18	6	10	18
Open/area eligible							
Number of states	N = 30	N = 31	N = 30	N = 29	N = 24	N = 25	N = 27
Percentage of sites	92	90	90	93	93	86	73
Closed							
Number of states	N = 30	N = 31	N = 30	N = 29	N = 24	N = 25	N = 27
Percentage of sites	8	10	10	7	7	14	27
SFSP							
New area eligible							
Number of states	N = 35	N = 35	N = 35	N = 35	N = 36	N = 36	N = 35
Percentage of sites	13	15	15	12	13	17	26
Open/area eligible							
Number of states	N = 42	N = 42	N = 42	N = 42	N = 45	N = 45	N = 44
Percentage of sites	91	91	91	92	91	86	73
Closed							
Number of states	N = 42	N = 42	N = 42	N = 42	N = 45	N = 45	N = 44
Percentage of sites	9	9	9	8	9	14	27

#### Table C.3. Percent SSO or SFSP sites by area eligibility status, March through September 2020

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2020.

Note: States included in the analysis are those that provided data on sites made area eligible in SSO or SFSP because of the area eligibility nationwide waver. Percentages are calculated by dividing the number of sites made area eligible in SSO or SFSP because of the area eligibility nationwide waver, the number of sites classified as open or area eligible under Federal regulations, or the number of closed sites by the total number of SSO and SFSP sites in States that provided these data.

	Mar. 2020 (#)	Apr. 2020 [# (% change)]	May 2020 [# (% change)]	Jun. 2020 [# (% change)]	Jul. 2020 [# (% change)]	Aug. 2020 [# (% change)]	Sep. 2020 [# (% change)]	<b>`</b>	Jun. to Jul. 2020 (unduplicated total number of outlets)	· ·
Outlets operating CACFP	105,640	57,129 (-46%)	61,773 (8%)	66,754 (8%)	66,470 (0%)	74,932 (13%)	85,238 (14%)	64,266	72,648	88,230

#### Table C.4. Outlets providing meals through CACFP from March through September 2020 and monthly percentage change

Source: School Meals Operations Study, disaggregated FNS-44 data from fiscal year 2020.

Note: Forty-three States provided outlet-level FNS-44 data.

	Mar. 2020 (#)	Apr. 2020 [# (% change)]	May 2020 [# (% change)]	Jun. 2020 [# (% change)]	Jul. 2020 [# (% change)]	Aug. 2020 [# (% change)]	Sep. 2020 [# (% change)]
NSLP N = 54	23,153,369	112,044 (-100%)	108,506 (-3%)	78,417 (-28%)	196,192 (150%)	3,394,458 (1,630%)	3,043,962 (-10%)
SBP N = 54	12,628,537	132,243 (-99%)	151,763 (15%)	132,872 (-12%)	209,393 (58%)	1,932,626 (823%)	1,704,828 (-12%)
SSO N = 40	5,919,772	4,182,375 (-29%)	3,870,621 (-7%)	2,200,973 (-43%)	1,280,534 (-42%)	1,527,099 (19%)	4,071,976 (167%)
SFSP N = 53	3,887,466	6,244,543 (61%)	6,807,578 (9%)	5,185,402 (-24%)	4,975,118 (-4%)	4,372,921 (-12%)	7,414,986 (70%)
Total <sup>a</sup> N = 54	34,400,149	10,571,525 (-69%)	10,841,919 (3%)	7,528,458 (-31%)	6,492,047 (-14%)	9,367,870 (44%)	14,677,175 (57%)

#### Table C.5. Children participating in NSLP, SBP, SSO, and SFSP from March through September 2020 and percent change

Source: School Meals Operations Study, disaggregated FNS-10, FNS-418, and FNS-44 data from fiscal year 2020.

Note: Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals. Pennsylvania did not provide operating days or average daily meals for SFSP and is therefore excluded from SFSP participation data. If an SFA shifted operations between NSLP and SSO in a given month, children served by that SFA are only included in the SSO participation data for that month.

<sup>a</sup> Totals include SSO, SFSP, and either NSLP or SBP, based on which program had a larger number of children participating that month.

	Mar. 2020 (#)	Apr. 2020 [# (% change)]	May 2020 [# (% change)]	Jun. 2020 [# (% change)]	Jul. 2020 [# (% change)]	Aug. 2020 [# (% change)]	Sep. 2020 [# (% change)]
CACFP	3,642,891	1,368,071 (-62%)	1,914,082 (40%)	1,983,727 (4%)	1,261,374 (-36%)	1,805,610 (43%)	2,541,101 (41%)
Child care centers	3,270,454	1,134,648 (-65%)	1,651,705 (46%)	1,682,416 (2%)	934,353 (-44%)	1,463,700 (57%)	2,200,837 (50%)
Family day care homes	372,341	233,423 (-37%)	262,324 (12%)	301,231 (15%)	326,875 (9%)	341,722 (5%)	340,177 (0%)

#### Table C.6. Children participating in CACFP from March through September 2020 and monthly percentage change

Source: School Meals Operations Study, disaggregated FNS-44 data from fiscal year 2020.

Note: All 50 States the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands provided child participation data that is included in the first and second rows of this table. Child participation in child care centers and family day care homes does not equal total CACFP child participation for some months because outlet type was not available for all child participation data. Child participation equals the meal count for the meal type with the most claims divided by operating days. If the State did not provide operating days but did provide average daily meals, child participation equals the State-provided average daily meals.

### Table C.7. Meals and snacks/supplements served by school, site, or outlet type through NSLP, SBP, SSO, SFSP, and CACFP during COVID-19 (March through September 2020) and monthly percentage change

	Mar. 2020 [# (% change across child nutrition programs)]	Apr. 2020 [# (% change across child nutrition programs)]					Sep. 2020 [# (% change across child nutrition programs)]
NSLP	N = 44	N = 43	N = 43	N = 43	N = 42	N = 42	N = 41
Public schools	203,266,046 (38%)	853,200 (0%)	731,311 (0%)	651,638 (0%)	1,281,785 (0%)	29,741,169 (11%)	47,541,957 (10%)
Private schools	4,710,347 (1%)	51,668 (0%)	79,775 (0%)	53,625 (0%)	62,329 (0%)	717,528 (0%)	2,287,194 (0%)
RCCIs	1,932,776 (0%)	1,562,346 (0%)	1,537,105 (0%)	1,439,566 (0%)	1,375,125 (0%)	1,413,253 (1%)	1,464,119 (0%)
SBP	N = 44	N = 43	N = 43	N = 43	N = 42	N = 42	N = 41
Public schools	97,650,519 (18%)	758,344 (0%)	628,698 (0%)	581,963 (0%)	1,192,902 (0%)	17,640,288 (6%)	27,012,784 (6%)
Private schools	1,310,077 (0%)	40,680 (0%)	52,995 (0%)	37,248 (0%)	37,493 (0%)	162,951 (0%)	1,086,902 (0%)
RCCIs	1,313,686 (0%)	1,126,640 (0%)	1,131,493 (0%)	1,060,061 (0%)	1,034,637 (0%)	1,056,429 (0%)	1,056,496 (0%)
SSO	N = 33	N = 33	N = 32	N = 31	N = 26	N = 28	N = 29
Public schools	66,889,132 (12%)	144,928,280 (36%)	135,668,685 (32%)	85,341,360 (25%)	50,823,130 (17%)	29,269,033 (11%)	93,347,623 (20%)
Private schools	5,222,883 (1%)	7,011,056 (2%)	14,347,915 (3%)	15,481,025 (5%)	3,122,387 (1%)	3,308,388 (1%)	3,784,522 (1%)
RCCIs	105,697 (0%)	111,602 (0%)	96,843 (0%)	49,371 (0%)	9,783 (0%)	4,757 (0%)	53,513 (0%)
Other sites	249,680 (0%)	849,280 (0%)	646,803 (0%)	520,227 (0%)	343,653 (0%)	73,248 (0%)	279,727 (0%)
SFSP	N = 43	N = 43	N = 43	N = 43	N = 45	N = 45	N = 44
Self-prep/rural sites	46,744,891 (9%)	154,631,185 (38%)	153,645,145 (36%)	113,074,175 (34%)	108,933,977 (36%)	72,443,682 (26%)	146,301,728 (31%)
Other sites	11,781,505 (2%)	39,578,051 (10%)	45,412,478 (11%)	42,606,149 (13%)	66,266,470 (22%)	53,494,332 (19%)	49,144,867 (10%)
CACFP	N = 43	N = 43	N = 43	N = 43	N = 43	N = 43	N = 43
Tier I	16,227,081 (3%)	11,819,442 (3%)	12,504,109 (3%)	15,117,948 (4%)	15,379,987 (5%)	15,343,447 (6%)	15,270,497 (3%)
Tier II	2,040,747 (0%)	1,305,390 (0%)	1,453,524 (0%)	1,837,457 (1%)	1,876,953 (1%)	1,988,518 (1%)	2,079,690 (0%)
Family Day Care Homes	18,274,110 (3%)	13,129,507 (3%)	13,962,623 (3%)	16,961,659 (5%)	17,263,724 (6%)	17,338,267 (6%)	17,357,733 (4%)
For-profit center	29,281,523 (5%)	13,510,621 (3%)	18,532,425 (4%)	25,894,015 (8%)	27,120,966 (9%)	26,569,602 (10%)	29,323,945 (6%)
OSHCC	1,789,520 (0%)	400,889 (0%)	591,159 (0%)	833,888 (0%)	681,185 (0%)	738,188 (0%)	1,239,298 (0%)
Head Start	7,884,447 (1%)	860,527 (0%)	1,131,467 (0%)	1,078,179 (0%)	1,249,015 (0%)	1,680,231 (1%)	5,396,407 (1%)
At-risk afterschool	10,285,094 (2%)	8,438,854 (2%)	12,469,204 (3%)	10,058,047 (3%)	487,403 (0%)	2,036,900 (1%)	12,098,808 (3%)
Emergency shelter	259,082 (0%)	209,477 (0%)	171,187 (0%)	204,172 (0%)	198,649 (0%)	208,158 (0%)	189,153 (0%)

	Mar. 2020 [# (% change across child nutrition programs)]	Apr. 2020 [# (% change across child nutrition programs)]	May 2020 [# (% change across child nutrition programs)]	Jun. 2020 [# (% change across child nutrition programs)]	Jul. 2020 [# (% change across child nutrition programs)]	Aug. 2020 [# (% change across child nutrition programs)]	Sep. 2020 [# (% change across child nutrition programs)]
All other CCCs	19,179,163 (4%)	5,836,799 (1%)	8,267,739 (2%)	14,073,393 (4%)	15,313,782 (5%)	16,320,908 (6%)	18,633,844 (4%)
CCC	70,104,624 (13%)	30,119,321 (7%)	41,857,890 (10%)	52,617,322 (16%)	45,582,352 (15%)	48,573,922 (17%)	68,701,317 (15%)

Source: School Meals Operations Study, disaggregated FNS-10, FNS-418, or FNS-44 data from fiscal year 2020.

Note: Sample sizes differ by program and month and are provided in program subheading rows. Percentages are calculated by dividing the number of meals served in each school, site, or outlet type for each month by the total number of meals served during the month across all five programs. Percentages sum to greater than 100 because of sites that provide both NSLP and SBP

	aaning ee						
	Mar. 2020 (%)	Apr. 2020 (%)	May 2020 (%)	Jun. 2020 (%)	Jul. 2020 (%)	Aug. 2020 (%)	Sep. 2020 (%)
NSLP/SBP N = 44							
1 meal	0	0	0	0	0	0	0
1 snack	0	0	0	0	0	0	0
1 meal + 1 snack	0	0	0	0	0	0	0
2 meals	82	60	57	58	65	91	89
2 meals + 1 snack	18	40	43	42	35	9	11
3 meals	0	0	0	0	0	0	0
3 meals + 1 snack	0	0	0	0	0	0	0
SSO N = 33							
1 meal	27	7	7	7	4	5	7
1 snack	0	0	0	0	0	0	0
1 meal + 1 snack	0	0	0	0	0	0	0
2 meals	71	92	93	93	95	94	92
2 meals + 1 snack	1	0	0	0	0	0	1
3 meals	0	0	0	0	0	0	0
3 meals + 1 snack	0	0	0	0	0	0	0
SFSP N = 45				·			
1 meal	6	6	6	10	11	9	5
1 snack	0	0	0	0	0	0	0
1 meal + 1 snack	2	3	4	8	9	8	2
2 meals	89	90	89	81	78	82	93
2 meals + 1 snack	1	0	0	0	0	0	0
3 meals	0	0	0	0	0	0	0
3 meals + 1 snack	0	0	0	0	0	0	0
CACFP N = 43				·			
1 meal	12	3	3	2	0	4	6
1 snack	4	1	1	1	0	2	4
1 meal + 1 snack	5	4	4	4	3	3	6
2 meals	1	1	1	1	1	1	2
2 meals + 1 snack	60	77	78	79	82	76	69
3 meals	0	0	0	0	0	0	0
3 meals + 1 snack	15	13	13	13	13	13	13

## Table C.8. Schools, sites, or outlets that served one or more meal type through NSLP/SBP, SSO, SFSP, and CACFP during COVID-19 (March through September 2020)

	Mar. 2020 (%)	Apr. 2020 (%)	May 2020 (%)	Jun. 2020 (%)	Jul. 2020 (%)	Aug. 2020 (%)	Sep. 2020 (%)	
Total N = 50								
1 meal	13	5	5	5	4	6	6	
1 snack	3	1	1	1	0	1	3	
1 meal + 1 snack	3	3	3	4	4	3	3	
2 meals	40	38	36	32	30	40	45	
2 meals + 1 snack	34	46	47	49	52	42	36	
3 meals	0	0	0	0	0	0	0	
3 meals + 1 snack	7	8	7	8	8	7	7	

Source: School Meals Operations Study, disaggregated FNS-10, FNS-418, and FNS-44 data from fiscal year 2020.

Notes: Program percentages are calculated by dividing the number of schools (NSLP, SBP, and SSO), sites (SFSP), or outlets (CACFP) serving more than one meal type by the total number operating each program during each month. Total percentages are calculated by dividing the number of schools, sites, or outlets serving more than one meal type across all five programs by the total number operating across the five programs during each month. Generally, if a school, site, or outlet operated in two programs in a month, it is counted twice in the totals. However, if a school shifted operations between NSLP and SSO in a given month, it is included only in the count of SSO sites for that month.

Appendix D Chapter III Supplemental Tables

# Table D.1. Percentage of State agencies reporting that certain proportions of local program operators experienced operational challenges providing meal service from March through September 2020, by local program operator type

Proportion of local program operators that experienced operational challenges	SFAs providing NSLP, SBP, SSO (% State agencies)	SFAs providing SFSP (% State agencies)	Non-SFA sponsors providing SFSP (% State agencies)	Institutions providing CACFP (% State agencies)
None	5	6	9	7
Less than half	27	20	22	18
About half	13	17	20	16
More than half	23	30	22	33
All	29	20	19	18
Don't know <sup>a</sup>	4	7	7	7

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021

Note: Percentages were calculated by dividing the number of State agencies reporting each proportion by the total number of State agencies responding.

<sup>a</sup> The percentage of State agencies that reported they did not know the proportion of local program operators that experienced operational challenges providing meal service.

Factors	SFAs providing NSLP, SBP, SSO (% State agencies)	SFA sponsors providing SFSP (% State agencies)	Non-SFA sponsors providing SFSP (% State agencies)	Institutions providing CACFP (% State agencies)
Completing waiver request forms	52	43	39	40
Identifying site locations	30	30	35	24
Obtaining approval for new sites	29	28	35	20
Establishing new meal delivery methods	66	70	70	65
Obtaining needed meal delivery equipment	54	57	52	36
Redistributing staff to manage meal sites and delivery methods	71	72	67	55
Ensuring staff safety and obtaining personal protective equipment	80	76	76	73
Continuity of operations during staff absences	84	80	70	76
Providing meals during food shortages or supply chain issues	66	67	63	71
Obtaining meal packaging	59	63	54	53
Other	5	4	2	2
Other: Switching meal operations to accommodate serving in-school and virtual students	5	4	2	2
Don't know what factors contributed to operational challenges	2	2	0	2

### Table D.2. Factors contributing to operational challenges providing meal service from March through September 2020, by local program operator type

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies reporting each factor by the total number of State agencies that oversee the programs.

<sup>a</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded.

### Table D.3. Operational challenges for local program operators in rural and urban/suburban areas from March through September 2020

Differences	Percentage of State agencies
No Difference in Rural vs. Urban/Suburban Operational Challenges	46
Differences in Rural vs. Urban/Suburban Operational Challenges	51
Rural: meal site access/distances	32
Rural: supply chain issues	29
Rural: meal delivery	21
Rural: staff availability	21
Rural: participation decreases affected operations	3
Urban/suburban: meal delivery	3
Urban/suburban: participation decreases affected operations	3
Don't know <sup>a</sup>	5

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Differences listed were derived from State agencies' open-ended responses. Percentage of State agencies were calculated by dividing the total number of State agencies that reported each difference by the total number that reported there were differences. "Rural" challenges were identified by State agencies as those that local program operators in rural areas experienced; "urban/suburban" challenges were identified by State agencies as those that local program operators in urban and suburban areas experienced.

<sup>a</sup> The percentage of State agencies that indicated there were differences in the operational challenges local program operators faced in rural areas compared to urban/suburban areas, but they did not know what the differences were.

## Table D.4. Percentage of State agencies in which certain proportions of local program operators experienced financial challenges providing meal service from March through September 2020, by local program operator type

Proportion of local program operators that experienced financial challenges	SFAs providing NSLP, SBP, SSO (% State agencies)	SFA sponsors providing SFSP (% State agencies)	Non-SFA sponsors providing SFSP (% State agencies)	Institutions providing CACFP (% State agencies)
None	4	7	9	5
Less than half	14	17	31	11
About half	13	9	11	18
More than half	41	43	24	42
All	21	13	13	16
Don't know <sup>a</sup>	7	11	11	7

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies reporting each proportion by the total number of State agencies responding.

<sup>a</sup> The percentage of State agencies that reported they did not know the proportion of local program operators that experienced financial challenges providing meal service.

	• • •			
Factors	SFAs providing NSLP, SBP, SSO (% State agencies)	SFA sponsors providing SFSP (% State agencies)	Non-SFA sponsors providing SFSP (% State agencies)	Institutions providing CACFP (% State agencies)
Meal packaging costs	75	72	67	62
Purchase of personal protective equipment for staff	79	72	72	78
Meal transportation and delivery costs	64	74	67	55
Purchase of equipment for alternate meal service approaches	57	59	43	35
Staff overtime or hazard pay	61	56	41	44
Increased food costs	71	67	65	71
Fixed staff-related costs	55	52	35	42
Other fixed costs	48	35	31	38
Decreased federal reimbursement because of decreased participation	79	61	52	82
Other	7	9	6	5
Other: Decreased a la carte and competitive food sales <sup>a</sup>	5	6	0	0
Don't know what factors contributed to financial challenges	2	0	0	0

Table D.5. Factors that contributing to financial challenges providing meal service from March through September 2020, by local program operator type

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies reporting each factor by the total number of State agencies that oversee the programs.

<sup>a</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded.

### Table D.6. Financial challenges for local program operators in rural and urban/suburban areas from March through September 2020

Differences	Percentage of State agencies
No Difference in Rural vs. Urban/Suburban Financial Challenges	28
Differences in Rural vs. Urban/Suburban Financial Challenges	69
Rural: higher transportation costs	53
Rural: higher food costs	22
Rural: participation decreases affected finances	18
Rural: higher supply costs	9
Rural: higher staffing costs	2
Urban/suburban: participation decreases affected finances	7
Urban/suburban: higher supply costs	2
Urban/suburban: higher staffing costs	2
Don't know <sup>a</sup>	7

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Differences listed were derived from State agencies' open-ended responses. Percentage of State agencies calculated by dividing the total number of State agencies that reported each difference by the total number that reported there were differences. "Rural" challenges were identified by State agencies as those that local program operators in rural areas experienced; "urban/suburban" challenges were identified by State agencies as those that local program operators in urban and suburban areas experienced.

<sup>a</sup> The percentage of State agencies that indicated there were differences in the financial challenges local program operators faced in rural areas compared to urban/suburban areas, but they did not know what the differences were.

# Table D.7. Percentage of State agencies that experienced financial or operational challenges administering Child Nutrition Programs, or challenges implementing or using the COVID-19 Child Nutrition nationwide waivers, from March through September 2020

Type of challenges	Percentage of State agencies
Financial	22
Operational	76
Implementing or using waivers	67

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies reporting each challenge by the total number of State agencies.

Table D.8. Factors that contributed to operational challenges administering Child Nutrition Programs from March through September2020, by program

Factor	NSLP (% State agencies)	SBP (% State agencies)	SSO (% State agencies)	SFSP (% State agencies)	CACFP (% State agencies)
Resources needed to review and approve waiver requests from providers	43	43	38	50	40
Resources needed to approve meal sites	27	27	25	37	22
Resources needed to assist providers with identification of meal sites	27	25	23	30	18
Resources needed to provide technical assistance to local program operators	41	39	34	44	44
Limitations on ability to hire new staff	27	27	27	24	25
Unexpected staff training needs	34	34	32	48	42
Redesigning monitoring approaches (for example, from onsite to virtual)	52	50	43	67	60
Implementing IT system changes	46	45	39	46	42
Office closures	41	41	36	46	51
Unclear guidance from FNS	57	57	50	61	58
Untimely guidance from FNS	68	66	57	70	65
Insufficient technical assistance from FNS	34	34	32	35	36
Other	11	11	11	11	7
No operational challenges with program administration	9	11	20	2	2

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each factor by the total number of State agencies that oversee the program.

## Table D.9. Percentage of State agencies that were unable to overcome certain challenges withimplementing or using COVID-19 Child Nutrition nationwide waivers from March throughSeptember 2020

Challenge	Percentage of State agencies
Slow guidance	12
Time/effort needed to collect data	10
Unclear guidance	9
Staff burden	9
Ensuring program integrity	4
Slow waiver release	3
Administrative funding inflexibility	1
Future uncertainty	1
CACFP waiver differences	1
At-risk afterschool waiver challenges	1
Guidance distributed to locals by advocates	1
None: No challenges reported implementing or using COVID-19 Child Nutrition waivers	33
None: State agencies were able to overcome all challenges	30

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Per Table D.2, sixty-seven percent of State agencies had challenges implementing or using COVID-19 Child Nutrition waivers. State agencies that experienced challenges were asked which they were unable to overcome. Challenges listed were derived from State agencies' open-ended responses. Percentages were calculated by dividing the number of State agencies that reported each challenge that could not be overcome by the total number of State agencies that oversee the programs. Some State agencies reported that they were able to overcome all challenges and others reported they experienced no challenges. These responses are captured in the last two rows of this table.

Factor	NSLP (% State agencies)	SBP (% State agencies)	SSO (% State agencies)	SFSP (% State agencies)	CACFP (% State agencies)								
Added new staff	7	7	5	4	5								
Increased staff hours	16	16	16	17	18								
Staff overtime	9	9	9	9	9								
IT system changes	13	13	11	9	7								
Other	9	9	9	7	7								
No financial challenges with program administration	0	0	2	2	2								

### Table D.10. Factors that contributed to financial challenges administering Child Nutrition Programs from March through September 2020, by program

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies reporting each factor by the total number of State agencies that oversee the program.

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Appendix E Chapter IV Supplemental Tables This page has been left blank for double-sided copying.

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NSLP (administered by 56 State agencies)	SBP (administered by 56 State agencies)	SSO (administered by 56 State agencies)	SFSP (administered by 54 State agencies)	CACFP (administered by 55 State agencies)		
44	43	40	53	52		
41	40	39	53	53		
31	NA	NA	NA	43		
38	38	36	42	42		
39	40	38	52	50		
52	48	NA	NA	NA		
NA	NA	NA	NA	54		
45	43	NA	NA	NA		
NA	NA	NA	52	NA		
30	27	NA	7	37		
NA	NA	34	47	NA		
NA	NA	NA	53	NA		
NA	NA	NA	51	NA		
NA	NA	39	52	NA		
42	38	NA	NA	NA		
31	NA	NA	24	NA		
NA	NA	39	49	NA		
NA	NA	38	44	NA		
	(administered by 56 State agencies)           44           41           31           38           39           52           NA           45           NA           30           NA           30           NA           31           32           33           30           NA           31           30           NA           31           NA           NA           NA           NA           NA           NA	(administered by 56 State agencies)         (administered by 56 State agencies)           44         43           41         40           31         NA           38         38           39         40           52         48           NA         NA           45         43           NA         NA           NA         NA           30         27           NA         NA           NA         NA           NA         NA           415         43           10         27           NA         NA           NA         NA           NA         NA           10         30           27         30           27         30           31         NA           NA         NA           31	(administered by 56 State agencies)(administered by 56 State agencies)(administered by 56 State agencies)44434041403931NANA3838363940383940385248NANANANA4543NA3027NA3027NANANA34NANA34NANA34ANANA394238NA31NANANANA39	(administered by 56 State agencies)(administered by 56 State agencies)(administered by 54 State agencies)(administered by 54 State agencies)444340534140395331NANANA38383642394038525248NANANANANANA4543NANA4543NA7NANA3447NANA3452NANA3453NANA3451NANA39524238NANANANA3952NANANA39ANANA3952NANA3952NANA3952NANA3952NANA3952NANA3952NANA3952NANA3952NANA3949		

Table E.1. Total number of State agencies that used each waiver from March through September 2020, by Child Nutrition Program

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, District of Columbia, Guam, Puerto Rico, and U.S. Virgin Islands during this time period. The waivers included here were used by local program operators. State Agency level waivers are shown in Appendix F. Shaded cells are not applicable.

NA = not applicable.

## Table E.2. Total number and percentage of all local program operators that used each waiver from March through September 2020, by Child Nutrition Program

	NSLP			SBP				SSO			SFSP			CAC care	FP: centers	CACFP: Family day care homes		
Waiver	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>
Meal Service Time Flexibility	4,571	35	5	3,990	35	5	5,687	68	4	6,478	73	4	3,414	14	6	611	>100 <sup>b</sup>	14
Non-congregate	6,144	44	4	5,530	46	4	6,945	78	2	7,168	78	2	4,174	16	5	153	26	12
Afterschool Activity Requirements in NSLP/CACFP	1,287	10	8	NA	NA	NA	NA	NA	NA	NA	NA	NA	791	4	14	29	6	13
Meal Pattern Flexibility	4,323	30	2	3,934	31	2	4,115	45	1	1,447	16	2	2,737	10	3	133	21	9
Parent Pick-up	5,171	38	4	4,603	39	4	5,801	68	3	5,779	68	3	2,933	12	7	292	51	13
CEP Deadlines in NSLP/SBP	4,740	40	7	4,332	41	6	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
CACFP Monitoring for Sponsors	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,496	26	13	1,001	>100 <sup>b</sup>	12
School Meals Onsite Monitoring - Revised	3,246	30	10	3,130	33	9	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
SFSP Onsite Monitoring for Sponsors	NA	NA	NA	NA	NA	NA	NA	NA	NA	4,289	60	11	NA	NA	NA	NA	NA	NA
60-Day Reporting Requirements	557	5	6	488	5	5	NA	NA	NA	213	2	2	842	4	8	47	9	9
SFSP/SSO Area Eligibility for Closed Enrolled Sites	NA	NA	NA	NA	NA	NA	2,926	36	4	2,694	32	5	NA	NA	NA	NA	NA	NA
SFSP First Week Site Visits	NA	NA	NA	NA	NA	NA	NA	NA	NA	4,616	57	7	NA	NA	NA	NA	NA	NA
SFSP Offer vs. Serve Flexibilities	NA	NA	NA	NA	NA	NA	NA	NA	NA	3,274	41	6	NA	NA	NA	NA	NA	NA
SFSP/SSO Meal Service Time	NA	NA	NA	NA	NA	NA	5,642	65	4	5,727	66	5	NA	NA	NA	NA	NA	NA

NSLP			SBP			SSO			SFSP			CACFP: Child care centers			CACFP: Family day care homes			
Waiver	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>	#	%	Don't Know <sup>a</sup>									
School Wellness Policy Assessments	6,026	48	3	5,436	49	2	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
NSLP/SFSP Food Service Management Contract Duration	260	2	4	NA	NA	NA	NA	NA	NA	214	3	4	NA	NA	NA	NA	NA	NA
SFSP/SSO Unanticipated School Closure Operations	NA	NA	NA	NA	NA	NA	6,522	85	6	5,988	78	9	NA	NA	NA	NA	NA	NA
SFSP/SSO Area Eligibility	NA	NA	NA	NA	NA	NA	3,226	37	4	3,693	43	3	NA	NA	NA	NA	NA	NA

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021 and disaggregated FNS-10, FNS-418, and FNS-44 data from fiscal year 2020.

Note: Program percentages were calculated by dividing the number of local program operators that State agencies reported in the survey used each waiver from March through September 2020 by the total number of local program operators that served program meals or snacks/supplements at any point during that time period, according to State administrative data.

<sup>a</sup> The number of State agencies that reported they did not know how many local program operators used the waiver, after reporting that the waiver was used in the program. These State agencies are excluded from the percentage calculations.

<sup>b</sup> Inconsistencies in the data collected from State agencies across the two sources affected the percentages to some extent. For example, in the survey, some State agencies reported a greater number of local program operators used a waiver in a certain Child Nutrition Program than the total number of local program operators that operated that program from March through September 2020, according to State administrative data. As a result, the percentage of local program operators that used certain waivers exceeded 100 percent for some programs, which are identified in the table as ">100."

NA = not applicable.

#### Table E.3. Percentage of State agencies in which SFAs established NSLP, SBP, or SSO meal sites with certain characteristics from March through September 2020, by proportion of SFAs

Characteristic	No SFAs (% State agencies)	<1/2 SFAs (% State agencies)	About 1/2 SFAs (% State agencies)	>1/2 SFAs (% State agencies)	All SFAs (% State agencies)	Don't Know <sup>a</sup> (% State agencies)
Central locations respective to children's homes	14	11	14	34	7	20
Locations with higher levels of participation in Child Nutrition Programs	16	13	16	29	4	23
Facilities with central kitchens	13	25	14	18	0	30
Facilities with larger spaces for meal preparation	14	16	21	18	4	27
Continued offering meals at all sites	7	29	18	20	13	14
Other <sup>b</sup>	23	5	2	2	4	36

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each proportion by the total number of State agencies responding.

<sup>a</sup> The percentage of State agencies that reported they did not know the proportion of SFAs that established meal sites with certain characteristics.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded. State agencies also reported the proportion of local program operators that provided the "other" characteristic specified. Other responses included bus routes, mobile sites, and home delivery.

Table E.4. Percentage of State agencies in which sponsors established SFSP meal sites with certain characteristics from March through September 2020, by proportion of sponsors

Characteristic	No Sponsors (% State agencies)	<1/2 Sponsors (% State agencies)	About 1/2 Sponsors (% State agencies)	>1/2 Sponsors (% State agencies)	All Sponsors (% State agencies)	Don't Know <sup>a</sup> (% State agencies)
Central locations respective to children's homes	6	15	20	31	9	19
Locations with higher levels of participation in Child Nutrition Programs	2	17	26	28	6	22
Facilities with central kitchens	2	33	22	22	4	17
Facilities with larger spaces for meal preparation	4	28	26	17	4	22
Continued offering meals at all sites	6	24	24	28	6	13
Other <sup>b</sup>	22	6	4	2	0	33

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each proportion by the total number of State agencies responding.

<sup>a</sup> The percentage of State agencies that reported they did not know the proportion of sponsors that established meal sites with certain characteristics.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded. State agencies also reported the proportion of local program operators that provided the "other" characteristic specified. Other responses included bus routes, mobile sites, and home delivery.

Table E.5. Percentage of State agencies in which institutions established CACFP meal sites with certain characteristics from March through September 2020, by proportion of institutions

Characteristic	No Institutions (% State agencies)	<1/2 Institutions (% State agencies)	About 1/2 Institutions (% State agencies)	>1/2 Institutions (% State agencies)	All Institutions (% State agencies)	Don't Know <sup>a</sup> (% State agencies)
Central locations respective to children's homes	15	29	7	15	4	31
Locations with higher levels of participation in Child Nutrition Programs	5	31	20	11	0	33
Facilities with central kitchens	13	36	13	5	0	33
Facilities with larger spaces for meal preparation	16	35	7	5	0	36
Facilities caring for children of essential workers	7	27	22	16	2	25
Continued offering meals at all sites	5	29	16	25	2	22
Other <sup>b</sup>	18	2	0	0	0	45

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each proportion by the total number of State agencies responding.

<sup>a</sup> The percentage of State agencies that reported they did not know the proportion of institutions that established meal sites with certain characteristics.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded. State agencies also reported the proportion of local program operators that provided the "other" characteristic specified. Other responses included bus routes, mobile sites, and home delivery.

### Table E.6. Percentage of SSO and SFSP sites that were open or closed from March through September 2020

Site type	SSO (% sites)	SFSP (% sites)
Open	30	53
Closed	7	13

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data, fiscal year 2020.

Notes: Open sites serve meals to all children from the community on a first-come, first-served basis, while closed sites serve meals to children enrolled in a program at the site The analysis includes SSO data provided by 31 States, and SFSP data provided by 45 States. Percentages are calculated by dividing the number of each type of SSO and SFSP site by the total number of SSO and SFSP sites in States that provided this data.

## Table E.7. Proportion of local program operators that used certain methods to target new meal sites with the Area Eligibility SFSP/SSO waiver most commonly reported by State agencies from March through September 2020, by local program operator type and program

Method	Proportion of SFAs providing SSO most commonly reported by State agencies	Don't Know <sup>a</sup>	Proportion of sponsors providing SFSP most commonly reported by State agencies	Don't Know <sup>a</sup>
No methods used- all sites approved as area eligible	None	11	None	9
Analyzed unemployment data	None	12	Less than half	15
Analyzed prior year school meals eligibility data	Less than half	10	Less than half	12
Identified site(s) that were area eligible in prior years	More than half	8	Less than half	8
Targeted near-eligible sites, such as sites where 40% of children were eligible for free or reduced-price meals	Less than half	11	More than half	9
Other <sup>b</sup>	None	9	None	10
Did not use any methods to target new meal sites	None	13	None	13

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies reported the proportion of local program operators on a 5-point scale: that included none, less than half, about half, more than half, and all. The SFSP/SSO Area Eligibility waiver was used by 38 State agencies for SSO and 44 State agencies for SFSP.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of SFAs that used certain methods to target new meal sites.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded. State agencies also reported the proportion of local program operators that provided the "other" method specified. Other responses included considered geography and identified accessible locations.

Table E.8. Percentage of State agencies across all waivers reporting that <u>more than half</u> or <u>all</u> local program operators implemented certain meal delivery methods, meal options, or meal counting methods

	All local program operators (% State agencies)	SFAs providing NSLP, SBP, or SSO (% State agencies)	Sponsors providing SFSP (% State agencies)	Institutions providing CACFP (% State agencies)
Meal delivery methods				
Walk-up sites at schools, centers, or other buildings	40	42	47	25
Curbside pick-up/ drive through service	54	63	60	31
Mobile sites at which a bus or van delivers meals at pre-set times	8	9	11	2
Delivery with stops at individual homes	5	5	6	4
Other home delivery methods	2	3	2	2
Meal options				
Full week (5 days) of meals at one time	19	23	24	5
2–3 days of meals at one time	26	30	31	12
Weekend meals	13	16	15	7
Bulk food packages <sup>a</sup>	11	13	12	6
Frozen meals	3	4	3	2
Shelf-stable meals	10	13	11	6
Supper and a snack through CACFP at-risk	14	NA	NA	14
Meal counting options				
Standard point of service system	26	16	33	27
Mobile technology (for example, laptop, tablet, or cell phone apps)	6	7	7	1
Paper rosters	42	40	44	43
Clickers	5	6	5	3
Other <sup>b</sup>	4	7	2	2

Source: SMO Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020-2021.

Note: Average percentages were calculated by dividing the summed numbers of State agencies that reported "more than half" or "all" for each method (for each local program operator type) by the summed numbers of State agencies that reported the local program operator type used each access-focused waiver. NA= not applicable.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded.

NA = not applicable.

## Table E.9. Percentage of State agencies reporting that local program operators indicated certain methods were most effective at providing the greatest number of meals to the greatest number of children from March through September 2020

Method	Percentage of State agencies
Allowing parents/guardians to pick-up meals without children present	91
Curbside pick-up/drive-through services	91
Distribution of 2–3 days of meals at one time	82
Distribution of a full week (5 days) of meals at one time	78
Walk-up sites at schools, centers, or other buildings	64
Mobile sites at which a bus or van delivers meals at pre-set times	63
Distribution of weekend meals	55
Delivery with stops at individual homes	51
Replacing individual meals with bulk food packages <sup>a</sup>	45
Distribution of shelf-stable meals	36
Distribution of frozen meals	25
Other home delivery method	10
Other <sup>b</sup>	10
Other: Offering all meals for free	3
Other: Non-congregate meals	3

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies were asked "what methods did local program operators indicate were the most effective at providing the greatest number of meals to the greatest number of children during the federally declared COVID-19 public health emergency, from March through September 2020?" Multiple responses were allowed. Percentages were calculated by dividing the number of State agencies that reported each method by the total number of State agencies responding.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded.

Table E.10. Percentage of State agencies reporting that local program operators indicated certain meal service methods were the most costly for providing meal service from March through September 2020, by local program operator type

Method	SFAs providing NSLP, SBP, or SSO (% State agencies)	SFA Sponsors providing SFSP (% State agencies)	Non-SFA Sponsors providing SFSP (% State agencies)	Institutions providing CACFP (% State agencies)
Providing meals at walk-up sites at schools, centers, or other buildings	23	17	19	13
Providing meals through curbside pick-up/drive-through service	34	28	28	24
Operating mobile sites at which a bus or van delivers meals at pre- set times	50	63	52	42
Delivering meals with stops at individual homes	55	65	52	49
Other methods for providing home delivery of meals	18	19	19	11
Distributing a full week (5 days) of meals at one time	9	17	15	13
Distributing 2–3 days of meals at one time	11	13	13	11
Distributing meals daily	38	46	41	36
Distributing weekend meals	9	17	17	11
Replacing individual meals with bulk food packages <sup>a</sup>	13	9	11	9
Providing frozen meals	7	9	9	5
Providing shelf-stable meals	32	28	28	20
Other	5	2	4	2
Don't know which types of meal service methods were most costly	23	20	26	35

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies were asked "what types of meal service methods did local program operators indicate were most costly for local program operators providing meal service during the federally declared COVID-19 public health emergency, from March through September 2020?" State agencies were allowed to select up to five methods for each local program operator type. Percentages were calculated by dividing the number of State agencies reporting each method by the total number of State agencies that oversee the programs.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

Table E.11. Proportion of local program operators with the Parent/Guardian Pick-up waiver most commonly reported by State agencies that used certain methods to ensure meals were distributed only to parents or guardians of eligible children from March through September 2020, by local program operator type

Method	Proportion of SFAs providing NSLP, SBP, or SSO most commonly reported by State agencies	Don't Know <sup>a</sup>	Proportion of sponsors providing SFSP most commonly reported by State Agencies	Don't Know <sup>a</sup>	Proportion of institutions providing CACFP most commonly reported by State Agencies	Don't Know <sup>a</sup>
Scanned children's meal cards or asked for children's personal identification numbers used for meal service	Less than half	10	Less than half	12	None	16
Requested children's names, ages or dates of birth, or grade levels when meals were picked up	Less than half	9	Less than half	11	More than half	11
Requested children's school names or a copy of school correspondence when meals were picked up	Less than half	9	Less than half	14	None	17
Requested the number of children for which the parent/guardian was picking up meals	All	8	More than half	9	More than half	13
Provided parents/guardians with rear view mirror hangers, placards, or QR codes	Less than half	14	Less than half	17	None	20
Posted signage to indicate who is eligible to pick up and receive meals	None	13	More than half	15	Less than half	19
Other <sup>b</sup>	None	16	None	17	None	19
Other: Parent signed form, provided attestation	Less than half	NA	More than half	NA	More than half	NA
Other: Pre-order	Less than half	NA	Less than half	NA	NA	NA
Did not use any methods to ensure meals were distributed only to parents/guardians of eligible children	None	11	None	11	None	15

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies reported the proportion of local program operators on a 5-point scale that included none, less than half, about half, more than half, and all. The Parent Pick-up waiver was used by 39 State agencies for NSLP, 38 State agencies for SBP, 38 State agencies for SSO, 52 State agencies for SFSP, and 50 State agencies for CACFP. NA= not applicable.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of local program operators that used certain methods to ensure meals were distributed only to parents or guardians of eligible children.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded. State agencies also reported the proportion of local program operators that provided the "other" method specified.

Table E.12. Proportion of local program operators with the Parent/Guardian Pick-up waiver that used certain methods to ensure duplicate meals were not distributed to any child from March through September 2020, by local program operator type

Method	Proportion of SFAs providing NSLP, SBP, or SSO most commonly reported by State Agencies	Don't Know <sup>a</sup>	Proportion of sponsors providing SFSP most commonly reported by State Agencies	Don't Know <sup>a</sup>	Proportion of institutions providing CACFP most commonly reported by State Agencies	Don't Knowª
Told parents/guardians picking up meals that children are not eligible to receive duplicate meals	All	11	All	12	All	17
Asked parents/guardians to self-attest that they were not picking up duplicate meals	Less than half	15	Less than half	13	Less than half	20
Requested children's names or other identifying information when meals were picked up	More than half	8	More than half	7	All	7
Used the same staff at multiple delivery sites (that provided meals at different times) located in a geographic area	Less than half	14	Less than half	14	Less than half	19
Other <sup>b</sup>	None	15	None	20	None	21
Other: Signage, outreach materials	All	NA	More than half	NA	All	NA
Other: Cross-checked rosters; used point-of-service system	Less than half	NA	NA	NA	NA	NA
Did not use any methods to ensure duplicate meals were not distributed	None	11	None	12	None	13

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies reported the proportion of SFAs on a 5-point scale that included none, less than half, about half, more than half, and all. The Parent Pickup waiver was used by 39 State agencies for NSLP, 38 State agencies for SBP, 38 State agencies for SSO, 52 State agencies for SFSP, and 50 State agencies for CACFP. NA= not applicable.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of local program operators that used certain methods to ensure duplicate meals were not distributed.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded. State agencies also reported the proportion of local program operators that provided the "other" method specified.

# Table E.13. Percentage of State agencies in which SFAs used the Meal Pattern Flexibility waiver to waive requirements for each meal component from March through September 2020, by Child Nutrition Program

Meal component	NSLP (% State agencies)	SBP (% State agencies)	SSO (% State agencies)	SFSP (% State agencies)	CACFP (% State agencies)
Milk	46	43	36	49	42
Meat/Meat alternates	13	9	16	21	21
Grains	31	27	30	36	33
Fruits	16	16	24	24	24
Vegetables	30	22	33	31	27
Don't know <sup>a</sup>	1	1	1	1	3
No response <sup>b</sup>	9	12	10	10	15
Vegetable subgroups	·			·	
Dark green	13	NA	12	NA	NA
Red/orange	7	NA	10	NA	NA
Starchy	10	NA	13	NA	NA
Legumes	12	NA	16	NA	NA
Other	4	NA	4	NA	NA
Don't know <sup>a</sup>	0	NA	0	NA	NA
No response <sup>b</sup>	15	NA	12	NA	NA

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: The Meal Pattern Flexibility waiver was used by 38 State agencies for NSLP, 38 State agencies for SBP, 36 State agencies for SSO, 42 State agencies for SFSP, and 42 State agencies for CACFP.

<sup>a</sup> The percentage of State agencies that reported they did not know which components local program operators waived, after reporting that the waiver was used in the program.

<sup>b</sup> State agencies either provided a file documenting local program operators that used the meal pattern waiver in each program or responded to survey questions about use of the waiver. "No response" reflects the percentage of State agencies that reported in the survey that the waiver was used for a program but did not provide information in their file on the components or vegetable subgroups for which the waiver was used.

NA = not applicable.

# Table E.14. Proportion of local program operators most commonly reported by State agencies that used the Meal Pattern Flexibility waiver for multiple food components from March through September 2020, by Child Nutrition Program

Program	Proportion of local program operators	Don't Know <sup>a</sup>	No Response <sup>b</sup>
NSLP	Less than half	0	0
SBP	Less than half	0	2
SSO	Less than half	0	0
SFSP	Less than half	0	1
CACFP	Less than half	0	2

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies reported the proportion of local program operators on a 5-point scale that included none, less than half, about half, more than half, and all.

The Meal Pattern Flexibility waiver was used by 38 State agencies for NSLP, 38 State agencies for SBP; 36 State agencies for SSO; 42 State agencies for SFSP; and 42 State agencies for CACFP.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of local program operators that waived multiple food components.

<sup>b</sup> State agencies either provided a file documenting local program operators that used the meal pattern waiver in each program or responded to survey questions about use of the waiver. "No response" reflects the number of State agencies that reported in the survey that the waiver was used for a program but did not provide information in their file on the components for which the waiver was used.

## Table E.15. Average percentage of State agencies across all access-focused waivers reporting that waivers improved services to children in certain ways from March through September 2020, by Child Nutrition Program

	NSLP (% State	SBP (% State	SSO (% State	SFSP (% State	CACFP (% State
Improved services to children	agencies)	agencies)	agencies)	agencies)	agencies)
Greater geographic distribution of sites	34	38	61	59	45
Increased number of sites	30	30	53	57	40
Increased alternative meal delivery methods	64	67	76	72	68
Allowed pick up of multiple meals at one time	67	70	78	73	74
Allowed distribution of bulk food packages <sup>a</sup>	51	53	68	62	60
Allowed service of available foods when supply issues occurred	43	48	55	46	50
Improved safety for children by not requiring congregate feeding or meal pick-up	75	73	79	72	79
Reduced barriers to receiving meals	79	79	88	85	88
Increased participation	55	59	75	76	66
Other <sup>b</sup>					
Other: Reduced food safety concerns	1	1	1	0	0
Other: Promoted equity for working families, families with disabilities	1	1	0	1	0
Don't know how this waiver improved services to children	7	7	2	2	1
This waiver did not improve services to children	2	1	0	1	1

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Access-focused nationwide waivers include Meal Service Time Flexibility, Non-congregate, Afterschool Activity Requirements in NSLP/CACFP, Meal Pattern Flexibility, Parent Pick-up, SFSP Offer vs. Serve Flexibilities, SFSP/SSO Meal Service Time, and SFSP/SSO Area Eligibility. Average percentages were calculated by dividing the summed numbers of State agencies reporting NSLP improvements from each waiver by the summed numbers of State agencies that used each access-focused NSLP waiver.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

<sup>b</sup> "Other" responses were derived from State agencies' open-ended responses. Responses that did not directly address the question were not coded.

Improved services to children	Meal Service Time Flexibility (% State agencies)	Non- congregate (% State agencies)	Afterschool Activity Requirement s in NSLP/ CACFP (% State agencies)	Meal Pattern Flexibility (% State agencies)	Parent Pick-up (% State agencies)
Greater geographic distribution of sites	43	44	26	21	38
Increased number of sites	30	34	32	21	33
Increased alternative meal delivery methods	73	83	52	39	72
Allowed pick up of multiple meals at one time	75	85	61	37	77
Allowed distribution of bulk food packages <sup>a</sup>	57	63	45	39	49
Allowed service of available foods when supply issues occurred	45	41	19	76	33
Improved safety for children by not requiring congregate feeding or meal pick-up	82	90	81	32	90
Reduced barriers to receiving meals	77	85	77	63	92
Increased participation	61	61	45	29	79
Other <sup>b</sup>					
Other: Reduced food safety concerns	NA	NA	NA	5	NA
Other: Promoted equity for working families, families with disabilities	NA	NA	NA	NA	3
Don't know how this waiver improved services to children	9	5	6	8	8
This waiver did not improve services to children	0	0	6	3	0
Number of State agencies that used waiver	44	41	31	38	39

Table E.16. Percentage of State agencies reporting that access-focused waivers improved NSLP services to children in certain ways from March through September 2020, by waiver

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each access-focused waiver for the program. NA= not applicable.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

Improved services to children	Meal Service Time Flexibility (% State agencies)	Non- congregate (% State agencies)	Meal Pattern Flexibility (% State agencies)	Parent Pick-up (% State agencies)
Greater geographic distribution of sites	44	48	21	38
Increased number of sites	30	38	21	33
Increased alternative meal delivery methods	74	85	39	70
Allowed pick up of multiple meals at one time	79	85	37	78
Allowed distribution of bulk food packages <sup>a</sup>	58	63	39	50
Allowed service of available foods when supply issues occurred	44	40	76	33
Improved safety for children by not requiring congregate feeding or meal pick-up	81	90	32	90
Reduced barriers to receiving meals	77	85	63	93
Increased participation	63	63	32	80
Other <sup>b</sup>				
Other: Reduced food safety concerns	NA	NA	5	NA
Other: Promoted equity for working families, families with disabilities	NA	NA	NA	3
Don't know how this waiver improved services to children	9	5	8	8
This waiver did not improve services to children	0	0	3	0
Number of State agencies that used waiver	43	40	38	40

Table E.17. Percentage of State agencies reporting that access-focused waivers improved SBP services to children in certain ways from March through September 2020, by waiver

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each access-focused waiver for the program. NA= not applicable.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

Table E.18. Percentage of State agencies reporting that access-focused waivers improved SSO services to children in certain ways from March through September 2020, by waiver

Improved services to children	Meal Service Time Flexibility (% State agencies)	Non- congregate (% State agencies)	Meal Pattern Flexibility (% State agencies)	Parent Pick-up (% State agencies)	SFSP/SSO Meal Service Time (% State agencies)	SFSP/SSO Area Eligibility (% State agencies)
Greater geographic distribution of sites	78	74	28	53	41	92
Increased number of sites	65	59	25	37	44	87
Increased alternative meal delivery methods	90	90	42	82	90	63
Allowed pick up of multiple meals at one time	100	97	42	87	97	47
Allowed distribution of bulk food packages <sup>a</sup>	83	77	53	74	82	39
Allowed service of available foods when supply issues occurred	65	59	83	47	38	34
Improved safety for children by not requiring congregate feeding or meal pick-up	98	95	39	95	85	61
Reduced barriers to receiving meals	98	90	61	97	95	89
Increased participation	93	79	33	84	79	82
Other <sup>b</sup>						
Other: Reduced food safety concerns	NA	NA	6	NA	NA	NA
Other: Promoted equity for working families, families with disabilities	NA	NA	NA	3	NA	NA
Don't know how this waiver improved services to children	0	0	8	0	0	3
This waiver did not improve services to children	0	0	3	0	0	0
Number of State agencies that used waiver	40	39	36	38	39	38

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each access-focused waiver for the program. NA= not applicable.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

Table E.19. Percentage of State agencies reporting that access-focused waivers improved SFSP services to children in certain ways from March through September 2020, by waiver

Improved services to children	Meal Service Time Flexibility (% State agencies)	Non- congregate (% State agencies)	Meal Pattern Flexibility (% State agencies)	Parent Pick-up (% State agencies)	SFSP Offer vs. Serve Flexibilities (% State agencies)	SFSP/SSO Meal Service Time (% State agencies)	SFSP/SSO Area Eligibility (% State agencies)
Greater geographic distribution of sites	81	77	31	56	22	52	95
Increased number of sites	68	77	33	46	24	60	91
Increased alternative meal delivery methods							
Allowed pick up of multiple meals at one time	98	98	45	88	41	96	45
Allowed distribution of bulk food packages <sup>a</sup>	87	81	48	65	37	77	39
Allowed service of available foods when supply issues occurred	57	47	81	31	37	33	36
Improved safety for children by not requiring congregate feeding or meal pick-up	94	96	38	98	37	85	57
Reduced barriers to receiving meals	94	92	69	98	53	96	91
Increased participation	91	94	36	88	53	85	86
Other <sup>b</sup>							
Other: Reduced stigma of receiving free meals	NA	2	NA	NA	NA	NA	NA
Other: Reduced food safety concerns	NA	NA	2	NA	NA	NA	NA
Other: Allowed safe meal delivery during a time with civil unrest, in addition to COVID	NA	NA	NA	2	NA	NA	NA
Other: Promoted equity for working families, families with disabilities	NA	NA	NA	4	NA	NA	NA
Don't know how this waiver improved services to children	0	0	2	0	12	0	0
This waiver did not improve services to children	0	0	5	0	0	0	0
Number of State agencies that used waiver	53	53	42	52	51	52	44

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each access-focused waiver for the program. NA= not applicable.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

Table E.20. Percentage of State agencies reporting that access-focused waivers improved CACFP services to children in certain ways from March through September 2020, by waiver

Improved services to children	Meal Service Time Flexibility (% State agencies)	Non-congregate (% State agencies)	Afterschool Activity Requirements in NSLP/CACFP (% State agencies)	Meal Pattern Flexibility (% State agencies)	Parent Pick-up (% State agencies)
Greater geographic distribution of sites	52	58	44	17	56
Increased number of sites	50	53	42	14	40
Increased alternative meal delivery methods	87	92	63	24	76
Allowed pick up of multiple meals at one time	94	89	74	29	86
Allowed distribution of bulk food packages <sup>a</sup>	75	68	60	31	66
Allowed service of available foods when supply issues occurred	54	47	35	79	34
Improved safety for children by not requiring congregate feeding or meal pick-up	90	96	88	29	92
Reduced barriers to receiving meals	94	92	91	67	98
Increased participation	69	83	70	26	82
Other <sup>b</sup>					
Other: Reduced stigma of receiving free meals	NA	2	NA	NA	NA
Other: Reduced food safety concerns	NA	NA	NA	2	NA
Other: Allowed safe meal delivery during a time with civil unrest, in addition to COVID	NA	NA	NA	NA	2
Other: Promoted equity for working families, families with disabilities	NA	NA	NA	NA	2
Don't know how this waiver improved services to children	2	0	2	2	0
This waiver did not improve services to children	0	0	0	5	0
Number of State agencies that used waiver	52	53	43	42	50

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each access-focused waiver for the program. NA= not applicable.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes. For example, a quart of milk provides four one-cup servings.

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Appendix F Use and Impact of Waivers Related to Program Administration This page has been left blank for double-sided copying.

In addition to the waivers that primarily focused on improving children's access to meals, FNS issued nationwide waivers that provided flexibilities related to program administration between March and September 2020. This Appendix provides an overview of the use of these waivers by local program operators and State agencies, as well as the ways in which the administration-related waivers improved services to children. The overview is followed by supplemental tables.

#### A. Use of waivers related to program administration

Among waivers related to program administration, local program operators operating SSO or SFSP most frequently used the SFSP/SSO Unanticipated School Closure Operations waiver, as discussed in Chapter IV. In addition, SFSP sponsors also frequently used the SFSP Onsite Monitoring for Sponsors waiver and the SFSP First Week Site Visits waiver, which both provide flexibilities related to certain program monitoring requirements related to onsite reviews.

Also as discussed in Chapter IV, SFAs operating NSLP and SBP during this time period most frequently used the School Wellness Policy Assessments waiver and the CEP Deadlines waiver. SFAs operating these programs also commonly used the School Meals Onsite Monitoring Waiver, which provided flexibilities related to certain monitoring requirements related to onsite reviews. In addition, CACFP institutions most frequently used the CACFP Monitoring for Sponsors waiver, which waived similar requirements.

FNS also issued nationwide waivers that provided monitoring flexibilities specifically for State agencies between March and September 2020, and nearly all State agencies used these waivers (Table F.1).

#### 1. Monitoring waivers

Under program regulations, State agencies and local program operators are required to monitor Child Nutrition Program operations, and onsite monitoring is required at specified intervals to help ensure program integrity. In order to maintain safety and minimize the spread of COVID-19, FNS issued waivers in each Program during the March through September 2020 period that provided flexibilities with these requirements for State agencies and local program operators. FNS guidance noted that suspending onsite monitoring is vital to support social distancing while providing meals, and that school and child care center and family day care home closures may limit opportunities for onsite monitoring.

Under these waivers, many State agencies and local program operators shifted their approaches to monitoring from onsite visits to alternative methods, like desk audits or virtual observations. State agencies reported that they most frequently conducted desk audits, either by reviewing records and paperwork or by interviewing site operators. State agencies also most commonly reported that more than half of their local program operators conducted desk audits. The next most common monitoring approach used by State agencies and local program operators was virtual observations, in which monitors reviewed live stream video of site operations or photos of meal preparation and service. State agencies also commonly reported that many local program operators did not conduct any monitoring during March through September 2020 while using these waivers.

#### B. Ways administration-focused waivers improved services to children

Most State agencies reported that waivers related to program administration helped improve services to children primarily by increasing State agency and local program operator ability to focus administrative resources on other priority areas, such as providing meals to children. State agencies also reported that these waivers increased their ability to provide technical assistance to local program operators. About half said the waivers increased the ability of local program operators to begin operations more quickly and increased administrative resources for addressing food supply issues and other challenges in preparing meals.

#### C. Supplemental tables

### Table F.1. Total number of State agencies nationwide that used each State agency monitoring waiver from March through September 2020

Waiver	# of State Agencies
CACFP Onsite Monitoring Requirements for State agencies	53
School Meals Onsite Monitoring - Revised	56
SFSP Onsite Monitoring Requirements for State agencies	53
CACFP Annual Review Requirements for State agencies	53

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Each waiver applies to specific Child Nutrition Programs, noted in the name of the waiver. During FY 2020, 56 State agencies administered NSLP, SBP, and SSO; 54 State agencies administered SFSP; and 55 State agencies administered.

Table F.2. Percentage of State agencies that conducted certain types of monitoring following implementation of State agency monitoring waivers from March through September 2020, by waiver

Types of monitoring	CACFP Onsite Monitoring Requirements for State Agencies (% State agencies)	School Meals Onsite Monitoring – Revised (% State agencies)	SFSP Onsite Monitoring Requirements for State agencies (% State agencies)	CACFP Annual Review Requirements for State agencies (% State agencies)
Desk audit - paperwork review	91	73	89	81
Desk audit - interviews with site operators	92	73	88	85
Virtual observations conducted through live stream video	66	48	54	57
Virtual observations through review of site photos	62	36	46	58
On-site while assisting with or observing meal service	17	16	23	17
Other	4	9	7	4
No monitoring conducted	8	11	0	13
Number of State agencies that used waiver	53	56	53	53

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Each waiver applies to specific Child Nutrition Programs, noted in the name of the waiver. Percentages were calculated by dividing the number of State agencies that conducted each type of monitoring in the relevant Child Nutrition Program(s) by the total number of State agencies that used each State agency monitoring waiver.

Table F.3. Proportion of local program operators most commonly reported by State agencies that conducted certain types of monitoring following implementation of local program operator on-site monitoring waivers from March through September 2020, by waiver

	CACFP Monitorii Sponsors	5		School Meals OnsiteSFSP Onsite MonitoringMonitoring - RevisedSponsors		SFSP First Week Si	ite Visits	
Types of monitoring	Proportion of institutions providing CACFP most commonly reported by State agencies	Don't Knowª	Proportion of SFAs providing NSLP and SBP most commonly reported by State agencies	Don't Knowª	Proportion of sponsors providing SFSP most commonly reported by State agencies	Don't Knowª	Proportion of sponsors providing SFSP most commonly reported by State agencies	Don't Knowª
Desk audit- paperwork review	More than half	11	More than half	15	More than half	11	More than half	13
Desk audit- interviews with site operators	More than half	11	More than half	15	More than half	12	Less than half	13
Virtual observations conducted through live stream video	Less than half	14	None	17	Less than half	15	Less than half	18
Virtual observations through review of site photos	Less than half	17	None	16	Less than half	17	Less than half	19
On-site while assisting with or observing meal service	Less than half	18	None	14	Less than half	11	Less than half	12
Other	None	25	None	16	None	22	None	23
No monitoring conducted	More than half	11	More than half	15	More than half	11	More than half	13

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: State agencies reported the proportion of local program operators on a 5-point scale: that included none, less than half, about half, more than half, and all.

The CACFP Monitoring for Sponsors waiver was used by local program operators in 54 State agencies. The School Meals Onsite Monitoring – Revised waiver was used by local program operators in 45 State agencies for NSLP and 43 State agencies for SBP. The SFSP Onsite Monitoring for Sponsors waiver was used by local program operators in 52 State agencies. The SFSP First Week Site Visits waiver was used by local program operators in 54 State agencies.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of local program operators that implemented certain types of monitoring.

Table F.4. Percentage of State agencies reporting that local program operator administration-focused waivers improved NSLP services to children in certain ways from March through September 2020, by waiver

Improved services to children	CEP Deadlines in NSLP/SBP (% State agencies)	School Meals Onsite Monitoring - Revised (% State agencies)	60-Day Reporting Requirements (% State agencies)	School Wellness Policy Assessments (% State agencies)	NSLP/SFSP Food Service Management Contract Duration (% State agencies)
Increased administrative resources for identifying meal sites	48	38	20	50	35
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	54	51	27	52	58
Increased administrative resources for providing meals	62	67	43	67	74
Increased ability to focus administrative resources on other priority areas to improve services to children	81	78	43	83	74
Increased ability of local program operators to begin operations more quickly	42	49	30	43	65
Other <sup>a</sup>					
Other: Enabled more schools to qualify, increasing children served	6	NA	NA	NA	NA
Other: Allowed reimbursement, improving SFA ability to serve children	NA	NA	10	NA	NA
Don't know how this waiver improved services to children	15	13	27	10	6
This waiver did not improve services to children	4	7	10	7	3
Number of State agencies that used waiver	52	45	30	42	31

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each local program operator administration-focused waiver. NA= not applicable.

Table F.5. Percentage of State agencies reporting that local program operator administration-focused waivers improved SBP services to children in certain ways from March through September 2020, by waiver

Improved services to children	CEP Deadlines in NSLP/SBP (% State agencies)	School Meals Onsite Monitoring – Revised (% State agencies)	60-Day Reporting Requirements (% State agencies)	School Wellness Policy Assessments (% State agencies)
Increased administrative resources for identifying meal sites	52	40	19	55
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	58	51	26	58
Increased administrative resources for providing meals	67	67	41	71
Increased ability to focus administrative resources on other priority areas to improve services to children	88	79	44	89
Increased ability of local program operators to begin operations more quickly	46	51	30	47
Other <sup>a</sup>				
Other: Enabled more schools to qualify, increasing children served	6	NA	NA	NA
Other: Allowed reimbursement, improving SFA ability to serve children	NA	NA	11	NA
Don't know how this waiver improved services to children	10	14	30	5
This waiver did not improve services to children	2	5	7	5
Number of State agencies that used waiver	48	43	27	38

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each local program operator administration-focused waiver. NA= not applicable.

Table F.6. Percentage of State agencies reporting that local program operator administration-focused waivers improved SSO services to children in certain ways from March through September 2020, by waiver

Improved services to children	SFSP/SSO Area Eligibility for Closed Enrolled Sites (% State agencies)	SFSP/SSO Unanticipated School Closure Operations (% State agencies)
Increased administrative resources for identifying meal sites	62	59
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	59	64
Increased administrative resources for providing meals	71	79
Increased ability to focus administrative resources on other priority areas to improve services to children	88	82
Increased ability of local program operators to begin operations more quickly	76	82
Don't know how this waiver improved services to children	3	13
This waiver did not improve services to children	0	0
Number of State agencies that used waiver	34	39

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each local program operator administration-focused waiver.

Table F.7. Percentage of State agencies reporting that local program operator administration-focused waivers improved SFSP services to children in certain ways from March through September 2020, by waiver

Improved services to children	SFSP Onsite Monitoring for Sponsors (% State agencies)	60-Day Reporting Requirements (% State agencies)	SFSP/SSO Area Eligibility for Closed Enrolled Sites (% State agencies)	SFSP First Week Site Visits (% State agencies)	NSLP/SFSP Food Service Management Contract Duration (% State agencies)	SFSP/SSO Unanticipated School Closure Operations (% State agencies)
Increased administrative resources for identifying meal sites	50	43	66	57	33	65
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	65	57	57	70	63	59
Increased administrative resources for providing meals	69	43	74	79	67	82
Increased ability to focus administrative resources on other priority areas to improve services to children	73	57	83	79	75	82
Increased ability of local program operators to begin operations more quickly	60	43	83	70	79	80
Don't know how this waiver improved services to children	13	0	4	6	8	8
This waiver did not improve services to children	2	14	2	2	0	0
Number of State agencies that used waiver	52	7	47	53	24	49

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each local program operator administration-focused waiver.

Table F.8. Percentage of State agencies reporting that local program operator administration-focused waivers improved CACFP services to children in certain ways from March through September 2020, by waiver

Improved services to children	CACFP Monitoring for Sponsors (% State agencies)	60-Day Reporting Requirements (% State agencies)
Increased administrative resources for identifying meal sites	33	19
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	50	30
Increased administrative resources for providing meals	59	43
Increased ability to focus administrative resources on other priority areas to improve services to children	76	57
Increased ability of local program operators to begin operations more quickly	52	30
Other <sup>a</sup>		
Other: Improve children's safety	4	NA
Other: Allowed reimbursement, improving SFA ability to serve children	NA	8
Don't know how this waiver improved services to children	15	22
This waiver did not improve services to children	0	14
Number of State agencies that used waiver	54	37

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 by the total number of State agencies that used each local program operator administration-focused waiver. NA= not applicable.

Table F.9. Percentage of State agencies reporting that State agency administration-focused waivers improved services to children in certain ways from March through September 2020, by waiver

Improved services to children	CACFP Onsite Monitoring Requirements for State agencies (% State agencies)	School Meals Onsite Monitoring – Revised (% State agencies)	SFSP Onsite Monitoring Requirements for State agencies (% State agencies)	CACFP Annual Review Requirements for State agencies (% State agencies)
Increased State agency administrative resources for approving meal sites	57	64	62	47
Increased State and local administrative resources for identifying meal sites	36	46	42	43
Increased State agency ability to focus administrative resources on other priority areas to improve services to children	60	82	68	66
Increased State agency ability to provide technical assistance to local program operators	87	86	83	81
Increased local program operators' administrative resources for providing meals to children	62	71	62	66
Increased local program operators' ability to focus administrative resources on other priority areas to improve services to children	60	77	62	60
Other	2	5	2	2
Number of State agencies that used waiver	53	56	53	53

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2020–2021.

Note: Each waiver applies to specific Child Nutrition Programs, noted in the name of the waiver. Percentages were calculated by dividing the number of State agencies that reported each improvement from March through September 2020 for the relevant Child Nutrition Program(s) by the total number of State agencies that used each administration-focused waiver.

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