

# Federal COVID-19 Child Nutrition Waiver Implementation: Best Practices from Four States



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# Executive Summary



Safety-related school closures have disrupted school meal service for children and contributed to millions of students' and families' economic struggles across the United States. In March 2020, Congress and the United States Department of Agriculture (USDA) enabled the use of waivers to adapt child nutrition programs to the presence of COVID-19. To explore best practices and lessons learned from the implementation of the USDA COVID-19 waivers, Nebraska Appleseed interviewed state and district nutrition administrators from Nebraska, Kansas, Iowa, and Colorado, did legal research on waiver implementation, explored national best practice resources, and compared waiver implementation across multiple settings.

Traditional child nutrition program operations and COVID-19 adaptations allowed through USDA waivers are explored with a comparison of state applications and approvals. Interviews reveal that state administrators agree that the use of the Summer Food Service Program (SFSP) is the waiver that is most impactful in terms of feeding students. The non-congregate and meal-time waivers, SFSP area eligibility, parent pickup, and CACFP area eligibility waivers are also noted as impactful, with specific participation results estimated by administrators.

Conversations with state and local administrators from our target states reveal best practices and lessons learned. Strong communication between the USDA and state administrators and state administrators and local nutrition directors was highly effective in ensuring program changes based on waivers were allowable and consistent. In-person and remote meal distribution participation challenges were addressed with best practices for increasing participation and revenue. Additionally, making use of technology, easing the burden of reporting, contingency planning, utilizing community partnerships, and managing staff fatigue are noted as impactful and detailed within.

Based on the interviews and research conducted, the report concludes with recommendations to acknowledge the long-term consequences of COVID-19 on the economy and food insecurity by maintaining certain flexibilities currently allowed. These include maintaining universal free meals, eliminating area eligibility for the SFSP, supporting essential nutrition staff with pay and benefit increases, and pushing the burden of program adaptation off of local nutrition staff and onto state and federal agencies.

# Introduction



The COVID-19 pandemic has greatly increased food insecurity for children, families, and individuals throughout the United States.<sup>1</sup> Safety-related school closures have added to this challenge by disrupting school meal service for children and contributing to millions of students' and families' economic struggles.<sup>2</sup>

In March 2020, Congress and the United States Department of Agriculture (USDA) enabled the use of waivers to adapt child nutrition programs to the threat of COVID-19.<sup>3</sup> The enormous challenge of putting these waivers into action has required innovation and resilience from state and local nutrition administrators. Through legal research, interviews with state and district level school nutrition program administrators, and nationwide best practice research, we have compared waiver implementation across multiple settings. To explore Nebraska's context in-depth, our research focused on neighboring states Kansas, Iowa, and Colorado.

Given that the economic crisis resulting from the pandemic will continue long after infection rates decrease, we hope this research will add to the voices advocating for extending many of these flexibilities into regular service, as well as guiding meal service administrators with best practices as the pandemic continues.

## Federal Programs to Feed Kids



As of this writing, COVID-19 has affected nearly a full year of child nutrition program operations. A brief explanation of the ways in which these programs traditionally interact will provide some context for changes happening through COVID-19 waivers.

### Child Nutrition Programs

During a traditional school year, the National School Lunch Program (NSLP)<sup>4</sup> works with the School Breakfast Program (SBP)<sup>5</sup> to provide healthy, appetizing, and consistent meals for students in schools across the country. These programs rely on annual Free and Reduced-Price Lunch (FRPL) surveys to identify students who qualify at free, reduced price, or paid rates based on their family's income.<sup>6</sup> Based on these designations, schools are reimbursed for the meals they serve. To remain eligible, programs must maintain records, serve meal components based on required meal patterns, and maintain a budget separate from the school's.

The Fresh Fruit and Vegetable Program (FFVP) allows schools to receive a set amount of funding per student per year to distribute fresh fruit and vegetables to elementary school

students.<sup>7</sup> The goal of this program is to expose students to a variety of fresh fruits and vegetables and support acceptance of these later in life.

The Child and Adult Care Food Program (CACFP) At Risk After School Program<sup>8</sup> allows districts to serve meals and/or snacks to students who participate in afterschool or enrichment activities based on participating student populations. Programs are eligible to participate if participants have a cumulative 50 percent or higher FRPL eligibility. As with other programs, CACFP programs must abide by meal component requirements to receive reimbursement for qualifying meals.

The Summer Food Service Program (SFSP) is designed to operate when schools are closed.<sup>9</sup> SFSP sponsors can be school districts, nonprofits, tribal groups, agencies such as parks and recreation or libraries, and others. Sponsors may serve two SFSP meals per day at a site if an area school has 50 percent or more students qualifying for FRPL or 50 percent or more poverty in the area based on Census data. Sponsors can operate sites open to the public or exclusively for enrolled students and all meals must be served free to people ages 1-18.

Each of these programs are administered and monitored through the efforts of child nutrition program offices at the state level, generally Departments of Education, with overarching authority coming from the USDA's Food and Nutrition Services (FNS) office. Compliance, reporting, training and technical assistance is overseen by administering agencies and dictated by federal and state law and USDA rules and regulations.<sup>10</sup>

## **COVID-19 and Waivers**

While states can implement laws and regulations governing state meal programs,<sup>11</sup> waivers specifically seek to make exceptions to federal laws and regulations. If a state identifies a problem specific to their statewide implementation of a child nutrition program, a state agency may request a waiver to alter services. The option for states to apply for a waiver has been in place for as long as the child nutrition programs have been available.

The Families First Coronavirus Response Act of 2020 gave states authority to issue child nutrition waivers in response to the COVID-19 pandemic.<sup>12</sup> Two provisions within it laid the groundwork for waiver use: the MEALS Act<sup>13</sup> authorized federal agencies to grant waivers to states which will increase federal costs (which is usually barred) and the COVID-19 Child Nutrition Response Act<sup>14</sup> allowed these waivers to be established nationally and provides procedures for states and programs who utilize the waivers.

### **Nationwide COVID-19 Waivers**

The first round of nationwide waivers were granted in March of 2020 and most have been extended several times by the USDA. State agencies may participate in any or all of the waivers, but must opt-in by informing their USDA FNS Regional Office in writing. State agencies do not need to participate if they choose not to.

Find a list and links to nationwide waivers and extensions as identified by the USDA and waiver participation by Nebraska and selected neighboring states<sup>15</sup> in Table 1 below.<sup>16</sup>

**Table 1: Nationwide COVID Waivers by State**

	Nebraska	Colorado	Kansas	Iowa
Meal Times	x	x	x	x
Non-congregate Feeding	x	x	x	x
Nationwide Meal Pattern Waiver	x	x	x	x
Nationwide Parent/Guardian Meal Pickup Waiver	x	x	x	x
Offer Vs Serve Flexibility for Sr High Schools for SY2020-21	x	x	x	x
Afterschool Activity	x	x	x	x
Nationwide Community Eligibility Prov (CEP) Data Waiver	x	x	x	x
Nationwide Waivers of Child Nutrition Monitoring		x	x	x
SFSP/SSO Area Eligibility Waiver	x	x	x	x
SFSP/SSO extension	x	x	x	x
60 Day Reporting Requirement Waiver	x	x	x	x
CACFP State Agency Monitoring (Annual Review)	x	x	x	x
Food Service Management Company Contract	x	x	x	x
Local School Wellness Policy Triennial Assessment	x	x		x
Extended Unanticipated School Closures	x	x	x	x
SFSP/SSO Meal Service Times (Regular Summer)	x	x	x	x
SFSP/SSO Closed Enrolled Sites (Regular Summer)	x	x	x	x
SFSP Offer Versus Serve (Regular Summer)	x	x	x	x
SFSP First Week Site Visits (Regular Summer)	x	x	x	x
Pre-approval Flexibility	x	x	x	x
Nationwide At-risk Afterschool Area Eligibility Waiver	x	x	x	x

## State COVID-19 Waivers

State-specific COVID-19 waivers required using the traditional approval process and had no across-the-board participation by states. Colorado and Iowa applied for waivers to enable continued use of the FFVP in ways other federal programs were allowed via nationwide waivers. Conversations with Colorado administrators revealed that these waivers were requested in response to the difficulty acquiring fresh produce due to higher demand on pre-packaged, single serving fruit and vegetables required for safe meal service throughout the country. Iowa administrators applied for these waivers to reduce the burden of parents having to stop at an additional site location to pick up the FFVP snack, reduce the administrative burden on the school, and maximize student participation. See links to approved state waiver requests from our focus states in Table 2 below.

**Table 2: State COVID-19 Waivers by State**

	Nebraska	Colorado	Kansas	Iowa
Fresh Fruit and Vegetable Program Parent Pickup		5/4/20		5/12/20
Fresh Fruit and Vegetable Program at Alternate Sites				6/8/20
Fresh Fruit and Vegetable Program Parent Pickup SY 2020-21	10/5/20	8/11/20		8/13/20
Fresh Fruit and Vegetable Program at Alternate Sites SY 2020-21		8/11/20		8/17/20
Community Eligibility Provision		6/12/20		
Provision 2 Base Year		7/31/20		



## Current Meal Service Models

School meal service currently looks vastly different than it did pre-pandemic.

For in-person learners, state administrators and districts have worked with CDC guidance<sup>17</sup> and their own state and local health departments to maintain social distance in lunch rooms, expand eating areas to gyms, outdoors, or other large areas, eliminate most self-service, and individually wrap or package servings of food.<sup>18</sup> Masks, sneeze guards, hand sanitizer, and single-use plastics have become standard.

For remote learners, distribution happens in a variety of ways. In larger districts, drive-through or curb-side pickup models have been effective and safe. National best practices include a walk-up distribution option, where staff place meals on a table or serving trays and families approach to collect meals. Taking steps to limit crowds such as extending meal pick-up times, scheduling pickups later in the day, or creating staggered meal service times that support social distancing are also preferred options.<sup>xxxvi</sup>

Mobile or school bus route delivery has eliminated the transportation barriers faced by some families. School districts using this method best ensure safety and efficiency by using a familiar schedule and selecting locations close to where families live.<sup>xxxvii</sup> Direct home delivery is another option that has increased participation in districts with the capacity.

Many districts are managing several of these options at the same time. Hybrid, in-person, and remote models can double or triple the work for nutrition staff.

## Conversations with Administrators about Waiver Implementation



To learn more about the waivers in action, Nebraska Appleseed conducted interviews with state child nutrition program administrators from Iowa,<sup>19</sup> Colorado,<sup>20</sup> Kansas,<sup>21</sup> and Nebraska.<sup>22</sup> We also interviewed district-level nutrition directors from Colorado<sup>23</sup> and Nebraska.<sup>24</sup> Meeting the needs of all students remains the goal for these school nutrition professionals, as each commented on the economic struggles families are going through as a driving motivation for their work.

## Most Impactful Waivers

The waiver each state administrator cited as most critical was the waiver allowing year-round use of the SFSP. The SFSP allows districts to serve meals free to all students and provides nutrition programs a higher federal reimbursement rate per meal served.<sup>25</sup> This is very important given the lower participation most districts have seen with both in person and remote meal distribution.

Two other groups of waivers were identified as critical: the non-congregate waiver coupled

with the meal time waiver, and the area eligibility waiver. Each of these were enabled by the reporting, monitoring, meal pattern, and other waivers but these two groups had the most impact on participation, according to our interviewees.

### **Non-congregate and Meal Time Waivers**

The non-congregate and meal time waivers have allowed meal service to happen through the SFSP without requiring children to stay on site to consume meals. The meal time waiver allows schools to serve up to seven days-worth of shelf-stable or heat-and-serve meals in a single drop off, delivery, or pickup. Combined, these waivers have allowed districts to distribute meals in bulk and in ways that accommodates caregiver schedules.

Ms. Moen, Summer Meals Program Supervisor with the Colorado Department of Education (CDE), shared that, in response to low participation at day-time pickups, some Colorado districts responded by moving or adding distributions into the evening to accommodate working caregivers. She noted that these added times increased participation significantly at implementing sites.

### **Area Eligibility Waiver**

The area eligibility waiver eliminated the requirement that SFSP meal sites be located in areas with 50 percent or more students on FRPL or 50 percent poverty according to the census. This waiver allows districts to serve meals in areas with any level of poverty, expanding access to communities and individuals who have never participated before. This waiver led to widespread expansion of the SFSP program during spring school closures that continued into summer and the new school year.

All four state-level administrator groups shared that this waiver allowed many more districts to participate than would normally qualify to serve meals. Additionally, this waiver allowed for delivery routes in sprawling rural districts, a practice that had never been allowed previously. Stephanie Dross, FFVP & SFSP Lead Consultant with the Iowa Department of Education (IDOE) noted that in Iowa, targeting high-needs apartment complexes with mobile distribution routes, using bus distribution and walk-through pickups in high-density locations, and traditional bus stop distribution in others eliminate the transportation barrier many families faced.

Comparing 2019 to 2020, Ms. Moen shared that Colorado's SFSP typically engaged around 85 sponsors and 650 sites. The area eligibility waiver has allowed 204 sponsors and 2312 meal sites including 95-97 percent of all districts. Sharon Davis, Administrator of Nutrition Services and Kayte Partch, Director of NSLP and SFSP, with the Nebraska Department of Education (NDE) shared that all but 8 districts in the state (one public, and seven small parochial) were not using the SFSP program, or 360 versus 60 normally. Representatives from Kansas and Iowa shared similar estimates but neither offered specifics. Each administrator pointed back to the area eligibility waiver as the flexibility that allowed this statewide increase in participation.

Interestingly, Ms. Partch in Nebraska shared that newly eligible and historically low-FRPL eligible districts in some parts of the state were serving huge, unexpected numbers of meals. This may indicate a hidden need masked by the historical 50 percent eligibility threshold or an increased need because of the pandemic.

### **Parent Pickup Waiver**

The parent pickup waiver allowed schools to distribute meals directly to parents without



children present. To participate in this waiver, local nutrition programs were required to create an integrity plan to make sure meals were going to students and share this with state administrators.

Our conversations revealed creativity from nutrition directors to make this happen efficiently. Cheryl Johnson, Director of Nutrition Services at the Kansas State Department of Education (KS DOE), shared that site-level nutrition staff in a larger district implemented this waiver by confirming the presence and number of students by checking student IDs once and then issuing car tags, stickers, or mirror hangers with corresponding distribution numbers for the future. This was both efficient and effective for distributing weekly meals.

### **CACFP Area Eligibility and 3<sup>rd</sup> Meal Service**

An additional nationwide waiver allowed districts to offer CACFP At Risk After School meals and snacks without area poverty eligibility constraints. This allowed schools doing remote meal service to not just serve breakfast and lunch each day through the SFSP, but also serve an additional meal and snack through the CACFP as well.

Danielle Bock, Nutrition Services Director with Greeley-Evans Weld County Schools District 6 in Greeley, CO, made use of these combined flexibilities to distribute 7 days worth of meals, or 7 breakfasts, 7 lunches, 7 suppers, and 7 snacks, in large ‘meal boxes’ at a single pickup each week. These additional meals are beneficial for both her reimbursements and the students’ food security.

A Colorado-specific challenge related to CACFP, described by Ms. Bock and Ms. Moen, is slower approval for new CACFP At Risk After School meals sponsors by the approving agency. In Colorado, the SFSP, NSLP, and SBP are administered by the CDE but the CACFP is administered by the Colorado Department of Public Health and Environment (CDPHE). As in all our other focus states, there are two application approval processes for sponsors but Colorado’s situation makes it challenging for sponsors with limited administrative capacity. Nonetheless CDPHE and CDE conducted outreach to district administrators on options to provide snack in addition to meals served through the SFSP but had a harder time getting approvals.

## **Overall Implementation and Lessons Learned**

There have been a variety of challenges related to waiver implementation since the start of the pandemic. Hard work, but also innovations on the state and local levels have helped meal service continue despite challenges.

### **State Communication with USDA**

In all four state administrator interviews, representatives identified their USDA regional offices as strong partners in implementing waivers. Iowa suggested that though they are new to the Midwest Region, they have been happy to bring challenges, ideas, and support to other regional states individually or as a group. Weekly regional calls to troubleshoot and share updates were valuable to the states. Kansas, Colorado, and Nebraska shared that the Mountain Plains Region calls were supportive as well. The peer-to-peer learning and opportunities to communicate directly with leadership also led to direct action: Ms. Shipley, Director of Nutrition Services

from IDOE, recounted that they applied for the FFVP state waivers specifically because of conversations and encouragement from these calls.

State feedback on waivers brought to the regional calls seemed to have an impact as well. Implementing the NSLP at the beginning of this school year was a challenge for state agencies. Kansas and Colorado shared on these calls that collecting FRPL forms, the need to increase student participation, collecting co-pays, and data tracking with remote service. Though the waivers to continue SFSP service were eventually extended two months into the school year, the USDA required advocacy from state nutrition agencies, and many others, to make it happen.<sup>26</sup> The direct communication within regional calls was noted as important to making that happen.

## **State Communication with Districts**

Timely, multi-channel, and consistent communication between state departments of education and local districts was noted as essential by all interviewees. Each state used various means to communicate information including one-on-one meetings, newsletters, emails, social media, webpages, webinars, and videos. One-on-one, even “24/7”, support from state program specialists was identified as the main key to success, at least in Iowa.

### ***Weekly Forums***

All four states implemented weekly meetings between state administrators and local nutrition staff to communicate new waivers, guidance, and changes. Some of these meetings existed pre-pandemic but all were held at a higher frequency as the pandemic descended.

Colorado created “On the Menu” Microsoft Team meetings and maintained a weekly schedule during the early part of the pandemic.<sup>27</sup> The agenda would include a brief teaching at the beginning of the call and the majority of time would be space for questions, answers, and peer-to-peer learning from within the state.

Nebraska created new “Serving up Great School Meals” Zoom meetings designed to network with others, share information, and troubleshoot challenges.<sup>28</sup> With over 100 nutrition professionals joining on average, they would use breakout rooms every two weeks to encourage smaller group interaction and conversation.

Kansas implemented regular, weekly town halls for information sharing and questions but also had responsive town halls the day after new waivers or changes were announced by USDA.

Iowa used a regional approach but had similar methods, discussed below.

### ***School Nutrition Advisory Council***

Ms. Dross and Ms. Shipley shared that Iowa created a new School Nutrition Advisory Council made up of a diverse group of key nutrition directors from across the state to help IDOE stay responsive to the needs of on-the-ground nutrition staff. This group met with the state Nutrition Services leadership to share feedback, shape trainings for regional calls, and develop communications strategies as a team. The council developed the regional calls model put into place to communicate USDA changes in the state.

### ***Meetings Specific to New Nutrition Directors***

All nutrition directors were thrust into new territory with the pandemic but new nutrition

directors had less of a foundation to stand on. Ms. Dross and her team in Iowa paid special attention to newer directors by communicating changes and brainstorming solutions at monthly meetings they were already happening. These meetings helped directors share challenges and successes but also make decisions about COVID-19 adaptations in a supported setting.

Ms. Moen and her team in Colorado identified similar needs and targeted their collaboration efforts at new SFSP sponsors. Special trainings highlighting program benefits and logistics helped ease the transition for newly participating districts and increased participation in the program overall.

## **Meal Participation and Budget**

One of the most critical challenges to current and future meal program operation has been maintaining a workable budget. Many district nutrition directors have worked to support their employees by maintaining pre-pandemic staffing levels. However, many have struggled to get the student participation and reimbursements needed to do so. Nearly every nutrition director we have heard from, especially those in larger districts, is having trouble getting students to eat at schools. Rural districts are having more success, perhaps due to the lower rates of infection and smaller communities.

Participation in remote distribution has been a challenge as well. Ms. Zumwalt, Nutrition Director for Lincoln Public Schools in Lincoln, NE, shared that they are overcoming it, at least as best as they can, by offering evening distribution, and a larger number of meals in each pickup (as many as 5 breakfasts and 5 lunches per student per week).

Ms. Bock in Greeley, CO has also innovated with her district's transportation staff during remote learning by working with her district's transportation department to run standard bus routes. Instead of picking up and dropping off students, the buses distribute bags of food. This innovation is another way to feed students and also maintain employment for district transportation staff while students are remote.

## **Technology**

Colorado stood out as innovating most with communications through technology. Best practices include using a collaboration website called Padlet to engage nutrition directors to share their best practices over the web.<sup>29</sup> The CDE also created a public facing "smart sheet" that combined all national and state waivers that notes their expiration dates and explains their use and function while linking to local resources for ease of access.<sup>30</sup>

## **Reporting**

The Families First Coronavirus Response Act requires a report on waiver use to be filed, no later than one year after the date the waiver was used, from each state agency utilizing a waiver. The report must include a summary of the use of the waivers and a description of "whether such waiver resulted in improved services to women, infants, and children."<sup>31</sup>

Ms. Partch and Ms. Davis in Nebraska reported that the USDA has engaged Mathematica to do a nationwide School Meal Operations study that will support reporting beginning March 2021. They expect minimal inputs from the state level above and beyond this local data collection, which will make meeting this requirement easier on local staff.

Ms. Johnson in Kansas shared that their team successfully built the federal waiver reporting

categories into their existing systems so no further requests would be needed from districts. This in-house data system, as opposed to a contracted-out system, is helpful in reducing local administrative burden and flexible to allow her state to adapt to reporting needs as they arise.

## **Contingency Planning**

A focus on contingency planning by state administrators and nutrition directors from large-districts has helped others prepare for school shutdowns or model shifts.

Ms. Partch from Nebraska described working with University of Nebraska Extension Educators to create and disseminate planning documents that would guide local administrators toward effective staffing alternatives and procedures if food service employees were required to quarantine.<sup>32</sup> The plan details engaging non-food-service employees, provides brief food safety training, and offers resources to source pre-packaged, meal pattern-adherent meals that will be helpful to maintain meal service in case food service staff is unavailable.

Ms. Bock in Greeley, CO described that since August, schools in her 14K student district were forced into building-wide quarantines for weeks at a time because of infection rates. In December 2020, the state had closed nearly all schools which made meal preparation and distribution challenging for her staff. With the remote meal service and a small number of in-person service locations in place, Ms. Bock divided the district's nutrition staff into two teams - one group to prepare meals together, and the other to remain on standby, ready to be called into action if the other team needs to quarantine. The two-team system has limited exposure while maintaining meal service. Ms. Bock shared that she has had to call up her standby team at least twice since the school year started.

## **Community Partnerships**

As a community partner in the school meals space ourselves, Nebraska Appleseed was particularly interested in how state administrators were making use of nonprofits and other school feeding champions to respond to COVID-19. Ms. Moen from Colorado described how their agency brought challenges associated with COVID to Colorado's Blueprint to End Hunger group.<sup>33</sup> The coalition helped CDE create outreach materials, think through issues, and collect and distribute financial resources. CDE also partnered with Lunch Assist, a national nonprofit supporting school nutrition directors, to create materials with cycle menus and a toolkit on how to implement meal service during the pandemic.<sup>34</sup>

Ms. Shipley in Iowa described her agency's work to build partnerships over the last 5-6 years to expand their impact and fill gaps. She noted the state's United Ways, food banks, ministerial associations, churches, public health departments, Department of Agriculture, extension offices, 4H, Boy and Girls' Clubs, state libraries, after school alliance, and more as relationships they can draw on because of her agency's concerted effort to develop these partnerships. These relationships supported IDOE's COVID-19 meal service adaptation, allowing them to partner with transit agencies across the state to do grant writing to run buses for meal distribution or allow families to ride buses for free to pick up meals.

Ms. Davis from Nebraska shared that schools stepping up and serving meals has been critical, especially in areas that had SFSP sponsors who were community partners in the past. Previous volunteer-utilizing SFSP sponsors from nonprofits or ministerial associations were more hesitant to participate this year because of the potential for exposure. Districts stepping up filled gaps left by these organizations.

## Managing Fatigue

Across the region, administrators described local nutrition staff as worn down from months of emergency meal service, added stress, and novel challenges. Many staff members have worked long, irregular hours, but the thought of kids who do not have access to meals remains the motivation driving them.

Ms. Dross in Iowa shared that staffing has always been a challenge for school nutrition programs but COVID highlighted it. Many long-time staff members retired early or resigned, worried about infection. Fewer staff means more strain on those working. Combine this with extended meal service, additional preparation work on some weekends and holidays, and tighter budgets because of lower participation and the stress can be overwhelming. Low pay, minimal benefits, and losing the immediate satisfaction of seeing the kids enjoying the food you prepared makes this a challenging issue without many solutions. Administrators suggested that finding ways to take time off was the best way to cope but many were unwilling to reduce the number of meals going out the door to give themselves a rest.

## Program Approvals and Paperwork

A final challenge expressed by Ms. Davis in Nebraska was that the many waiver extensions or changes resulted in what seemed like the constant need for Nebraska's 370 districts to apply formally to participate in federal programs and for state staff to approve applications. Since March, this has been required at least three times. The most recent waiver extensions allowed districts to operate without an approved application but the approvals still had to happen. Ms. Davis described this as perhaps the most stressful part for Program Specialists in her state office.

# Recommendations



Some of the flexibilities allowed by waivers will likely go away when the public health emergency and economic crisis have ended. However, it is our hope that the ones that have expanded meal service access to students in need will be maintained for the future.

## Meals for All

In the past, the SFSP has been limited to sites with high poverty and to times of school closure. However, school districts below the 50 percent poverty threshold are currently making use of the program and serving millions of meals to students in need. Meals for All, or meals served at no cost to students and families, as realized through the SFSP this year or Provision 2 and the Community Eligibility Provision (CEP) in traditional times, have clearly demonstrated their benefit.<sup>35</sup> When all students can eat for free, there is no stigma or judgement when students eat school meals. When more kids eat, fewer students are sent to the nurse's office or have

behavioral problems. Kids miss fewer days and have fewer tardies. Meals for All would reduce administrative burdens and bring school food programs more in line with the ethos of public, free, education in our nation. COVID-19 has highlighted the need for Meals for All and while we recommend continuing SFSP nationwide, taking up existing NSLP options like CEP and Provision 2 in as many eligible schools as possible should be a goal of national, state, and local nutrition leaders.

## Greater Flexibility in the SFSP

Traditional SFSP asks sponsors to serve meals on-site and requires students to stay until service concludes. While there is valuable learning and interactions from this congregate feeding model, not to mention greater control over food safety, the COVID-19 waivers have shown that pickup or delivery of heat-and-serve meals can get more food to the areas that need it and do it safely. Analyzing this new way of serving meals and comparing their impact with traditional should be a priority of the USDA. We recommend allowing this flexibility into the future.

## Support Essential Nutrition Staff as Essential

Early in the pandemic, nutrition staff were deemed essential workers and asked to maintain their duties in-person. New public recognition of the heroic work that these professionals do for the community was acknowledged as story after story of the thousands of meals served to kids in need circulated in the media. As the pandemic continues, we as a nation need to honor these essential workers and bring pay and benefits in line with their essential role. Increasing nutrition staff pay and benefits will boost staff retention, reward working in hazardous conditions, and fill open positions on nutrition staffs around the nation, making it easier for existing staff to do their job.

## Make Flexibilities Easier for Front Line Workers

One takeaway from this research and Nebraska Appleseed's COVID-19 communications with nutrition professionals around the region is that nutrition staff are functioning at a high level but are overly burdened by the weight of the pandemic, policy changes, and new onerous requirements. Not only has the work of feeding students tripled in many cases, the administrative tasks involved in keeping up with changes and reporting have multiplied as well. Local nutrition directors and staff should be able to focus on feeding students. We recommend federal leadership and state administrators reduce requirements that keep local staff from focusing on feeding students through simplifying and streamlining waiver implementation, program adaptations, and reporting requirements.

## Conclusion



The COVID-19 pandemic has brought suffering and challenges but it has also highlighted better ways we the US can meet the food and nutrition needs of school children. We hope this research provokes thoughtful consideration for decision makers and advocates as they seek to transition our child nutrition programs out of the COVID-19 era and into a changed world.



# References



- 1 Center on Budget & Policy Priorities, “Tracking the COVID-19 Recession’s Effects on Food, Housing, and Employment Hardships,” updated December 17th, 2020, <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and-employment-hardships>.
- 2 Food Research and Action Center, “April 2020: A Snapshot of Participation During COVID-19,” December 2020, <https://frac.org/wp-content/uploads/April-2020-Data-Report.pdf>.
- 3 USDA Food and Nutrition Services, Child Nutrition COVID-19 Waivers, Accessed 12/20/20 <https://www.fns.usda.gov/programs/fns-disaster-assistance/fns-responds-covid-19/child-nutrition-covid-19-waivers>.
- 4 USDA Food and Nutrition Services, “The National School Lunch Program,” updated Nov. 2017, Accessed December 15, 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/NSLPFactSheet.pdf>.
- 5 USDA Food and Nutrition Services, “The School Breakfast Program,” updated Nov. 2017, <https://fns-prod.azureedge.net/sites/default/files/resource-files/SBPfactsheet.pdf>.
- 6 USDA Food and Nutrition Services, Child Nutrition Program Income Eligibility Guidelines, updated 7/1/2020, <https://www.fns.usda.gov/cn/income-eligibility-guidelines>.
- 7 USDA Food and Nutrition Services, “The Fresh Fruit and Vegetable Program,” updated Dec. 2017, <https://fns-prod.azureedge.net/sites/default/files/resource-files/FFVPFactSheet.pdf>.
- 8 USDA Food and Nutrition Services, “How to participate in the at-risk afterschool meals component of CACFP,” [https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFPfactsheet\\_atrisk.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFPfactsheet_atrisk.pdf).
- 9 USDA Food and Nutrition Services, “How to participate in summer meals,” <https://fns-prod.azureedge.net/sites/default/files/resource-files/SFSP-Fact-Sheet.pdf>.
- 10 USDA Food and Nutrition Services, Off-site Monitoring Fact Sheets for Child Nutrition Programs, accessed December 17, 2020, <https://www.fns.usda.gov/cn/site-monitoring-fact-sheets-child-nutrition-programs>.
- 11 Food Research and Action Center, School Meals Legislation and Funding by State, August 2019, <https://frac.org/wp-content/uploads/state-leg-table-scorecard.pdf>.
- 12 Accessed December 17, 2020, <https://www.congress.gov/bill/116th-congress/house-bill/6201/text>
- 13 Accessed December 17, 2020, <https://www.congress.gov/116/plaws/publ127/PLAW-116publ127.pdf> (p. 8).
- 14 Accessed December 17, 2020 <https://www.congress.gov/116/plaws/publ127/PLAW-116publ127.pdf> (p. 9).
- 15 Note that the USDA webpage acknowledging state waiver take-up (<https://www.fns.usda.gov/disaster/pandemic/covid-19/cn-waivers-flexibilities>) has been identified as incorrect or slow to populate by state administrators interviewed for this project.
- 16 See above Note 3.
- 17 Centers for Disease Control and Prevention, “What School Nutrition Professionals and Volunteers at Schools Need to Know about COVID-19,” Updated Nov. 20, 2020, <https://www.cdc.gov/coronavirus/2019-ncov/community/organizations/school-nutrition-professionals.html>.
- 18 Food Research and Action Center, “Use Innovative Delivery Service Models to Serve Meals as Schools Reopen,” June 2020, [https://frac.org/wp-content/uploads/FRAC\\_HowItWorks\\_Meals-as-Schools-Reopen-1.pdf](https://frac.org/wp-content/uploads/FRAC_HowItWorks_Meals-as-Schools-Reopen-1.pdf) (p. 1-2).
- 19 Interview via Zoom with Kala Shipley, Director of Nutrition Services and Stephanie Dross, FFVP & SFSP Lead Consultant, both with the Iowa Department of Education, December 9, 2020.
- 20 Interview via Zoom with Ashley Moen, Summer Meals Program Supervisor with the Colorado Department of Education, Dec. 2, 2020.
- 21 Interview via Zoom with Cheryl Johnson, Director of Nutrition Services at the Kansas State Department of Education, Dec. 4, 2020.
- 22 Interview via Zoom with Sharon Davis, Administrator of Nutrition Services and Kayte Partch, Director of NSLP and SFSP, both with the Nebraska Department of Education, Dec. 1, 2020.
- 23 Interview via Zoom with Danielle Bock, Nutrition Services Director with Greeley-Evans Weld County Schools District 6 in Greeley, CO, Dec. 8, 2020.
- 24 Interview via Zoom with Edith Zumwalt, Nutrition Director for Lincoln Public Schools in Lincoln, NE, Oct. 15, 2020.
- 25 USDA Food and Nutrition Services, SFSP 2020 Reimbursement Rates, accessed December 17, 2020, <https://www.fns.usda.gov/sfsp/fr-013020>.
- 26 USDA Food and Nutrition Services, Nationwide Waiver to Allow SFSP and Seamless Summer Option Operations through SY 2020-2021 – Extension, accessed December 17, 2020, <https://www.fns.usda.gov/cn/covid-19-response-59>.
- 27 Colorado Department of Education, Training, accessed December 21, 2020, <https://www.cde.state.co.us/nutrition/nutritrainings>.
- 28 Nebraska Department of Education, School Lunch Training, December 21, 2020, <https://www.education.ne.gov/ns/training/national-school-lunch-program/>.
- 29 Padlet, <http://padlet.com>.
- 30 Colorado Department of Education, “USDA Waivers & Guidance,” Smartsheet, accessed December 9, 2020, <https://app.smartsheet.com/b/publish?EQBCT=2fbcc0b15a604b2fb461289e54d80f71>.
- 31 USDA Food and Nutrition Services, Nationwide Waiver to Extend Area Eligibility Waivers – Extension 3, updated October 9, 2020, <https://www.fns.usda.gov/cn/covid-19-response-60>.
- 32 Nebraska Department of Education, “EMERGENCY SCHOOL FOOD SERVICE GUIDANCE,” accessed December 19, 2020, [https://cdn.education.ne.gov/wp-content/uploads/2020/12/Emergency\\_School\\_Foodservice\\_Guidance.pdf](https://cdn.education.ne.gov/wp-content/uploads/2020/12/Emergency_School_Foodservice_Guidance.pdf).
- 33 Colorado Blueprint to End Hunger, accessed December 19, 2020, <https://www.endhungerco.org/>.
- 34 Lunch Assist, accessed December 19, 2020, <https://www.lunchassist.org/>.
- 35 No Kid Hungry Campaign, “UNIVERSAL FREE SCHOOL MEALS: COMPARING FUNDING OPTIONS TO CREATE HUNGER-FREE SCHOOLS,” accessed February 3, 2021, [http://bestpractices.nokidhungry.org/sites/default/files/providing-universal-free-school-meals\\_0.pdf](http://bestpractices.nokidhungry.org/sites/default/files/providing-universal-free-school-meals_0.pdf).

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This report was written by:  
**Eric Savaiano, M.Ed.**  
Economic Justice Program Manager for Food and Nutrition Access

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