

Beyond School Walls:

HOW FEDERAL, STATE AND LOCAL ENTITIES ARE ADAPTING POLICIES TO ENSURE STUDENT ACCESS TO HEALTHY MEALS DURING THE COVID-19 PANDEMIC

COVID-19 has created both a public health and economic crisis. Given the need for low-income children to have access to food during the pandemic, Trust for America's Health (TFAH) has identified promising policies and recommendations that can be implemented by local, state, and federal officials, as well as school systems, to protect against child hunger during the crisis. In some cases, these recommendations have been adapted to reflect how schools have modified their practices to protect against the spread of COVID-19.

Beginning on March 16, 2020, 20 states and the District of Columbia ordered the closure of schools to prevent the spread of COVID-19.³ Since then, all other states have followed suit by ordering or recommending school closures. While much of the focus has rightfully been on controlling the spread of the novel coronavirus, there are significant impacts of closing schools beyond changes in instruction delivery. Recent surveys indicate children are experiencing food insecurity at unprecedented rates.⁴ Therefore, there is a critical need for policies that increase access to nutritious meals for all children. Many children across the country depend on free or reduced-price school breakfast and lunch programs as one of their few sources of nutritious foods. Each day, over 50 percent of students (31 million) in the United States participate in the National School Lunch Program (NSLP) and 17 million participate in the School Breakfast Program.⁵

This issue brief builds upon recommendations covered in greater depth in TFAH's previously published reports, *Promoting Health and Cost Control in States: How States Can Improve Community Health and Wellbeing Through Policy Change* and *State of Obesity*. As highlighted in these reports, hunger, poor nutrition and food insecurity can increase a child's risk of developing a range of physical, mental, behavioral, emotional, and learning problems.¹ Hungry children also get sick more often and are more likely to be hospitalized.² Maintaining children's access to nutritious meals despite school closures not only ensure they do not go hungry, but also promotes children's health.

TABLE 1. Number of public schools, students enrolled, and percentage of students enrolled in free & reduced lunch programs¹⁵

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States	State Number of Public Schools	State Public School Enrollment	% of students enrolled in free and reduced lunch (2016-2017)	
Alabama	1,513	744,930	51.6%	
Alaska	507	132,737	45.3%	
Arizona	2,308	1,123,137	57.0%	
Arkansas	1,089	493,447	63.6%	
California	10,286	6,309,138	58.1%	
Colorado	1,888	905,019	42.2%	
Connecticut	1,250	535,118	35.7%	
Delaware	228	136,264	48.1%	
D.C.	223	85,850	76.4%	
Florida	4,178	2,816,791	58.1%	
Georgia	2,300	1,764,346	62.0%	
Hawaii	290	181,550	47.6%	
Idaho	745	297,200	45.8%	
Illinois	4,173	2,026,718	50.2%	
Indiana	1,921	1,049,547	47.9%	
Iowa	1,328	509,831	40.9%	
Kansas	1,318	494,347	48.2%	
Kentucky	1,539	684,017	58.7%	
Louisiana	1,404	716,293	63.0%	
Maine	605	180,512	45.0%	
Maryland	1,424	886,221	46.7%	
Massachusetts	1,856	964,514	39.9%	
	3,458	1,528,666	45.7%	
Michigan Minnesota	2,513		45.7% 37.7%	
		875,021		
Mississippi	1,066	483,150	75.0%	
Missouri	2,424	915,040	52.7%	
Montana	820	146,375	45.6%	
Nebraska	1,095	319,194	44,6%	
Nevada	657	473,744	60.8%	
New Hampshire	490	180,888	27.3%	
New Jersey	2,590	1,410,421	37.9%	
New Mexico	869	336,263	71.4%	
New York	4,798	2,729,776	52.6%	
North Carolina	2,624	1,550,062	57.4%	
North Dakota	519	109,706	30.9%	
Ohio	3,591	1,710,143	44.3%	
Oklahoma	1,792	693,903	62.5%	
Oregon	1,243	606,277	50.5%	
Pennsylvania	3,004	1,727,497	47.5%	
Rhode Island	315	142,150	47.6%	
South Carolina	1,252	771,250	67.0%	
South Dakota	697	136,302	37.9%	
Tennessee	1,774	1,001,562	58.8%	
Texas	8,909	5,360,849	59.0%	
Utah	1,037	659,801	36.4%	
Vermont	312	88,428	38.5%	
Virginia	2,134	1,287,026	41.2%	
Washington	2,436	1,101,711	43.6%	
West Virginia	739	273,855	44.6%	
Wisconsin	2,256	864,432	37.4%	
Wyoming	371	94,170	38.6%	

In response to school closures, the U.S. Department of Agriculture's Food and Nutrition Service (USDA FNS) began approving a number of nationwide waivers that provide flexibility as to where and how school meals are provided. For example, these waivers enable schools to serve meals in noncongregate settings and outside of standard mealtimes, serve afterschool snacks and meals outside of structured environments, and waive requirements that students be present when meals are picked up.6

As the 2019-2020 school year came to a close across the country, school districts, policymakers, and advocates planned how school meal programs could safely continue through the summer and what, if any, alterations to these programs will be needed once the school year begins in Fall 2020. Given the uncertainty regarding school openings for the 2020-2021 school year, school districts, in conjunction with local, state and federal partners, should adapt or implement school meal programs to ensure that access to high-quality, nutritious meals is available for students who depend on school breakfast and lunch programs. Furthermore, all school districts should continue to strive to meet or exceed federal nutrition guidelines as much as possible, even when waivers for those standards have been granted due to supply shortages due to the pandemic.

HOW THE U.S. IS ADAPTING SCHOOL MEAL PROGRAMS IN RESPONSE TO COVID-19 SCHOOL CLOSURES

Federal Action

The USDA FNS began issuing a number of waivers in March 2020 to states across the country to provide regulatory flexibility in how meals are delivered to students. Below we highlight a few of the many waivers that have been granted by USDA.

- Meal Times Waiver This waiver allows for meals to be served to qualifying students outside of traditional times. At first glance, flexibility in the timing of meal distribution may not seem to be very impactful. However, for the many low-income parents or guardians who have been deemed essential or frontline workers, this flexibility is critical to ensuring that their children can still receive nutritious school meals regularly and they are still able to provide for their families. All 50 states and the District of Columbia have been approved for this waiver.
- Meal Pattern Waiver This waiver provides flexibilities to school districts that may not be able to meet the meal pattern requirements (e.g., requiring to provide whole grain-rich foods) of child nutrition programs. This waiver recognizes that, like many households across the country, school districts have had difficulties in procuring specific foods that would enable them to meet the meal pattern requirement. In order to operate under this waiver, school districts must show hardships in getting specific products. All 50 states and the District of Columba have been approved for this waiver.
- Non-congregate Feeding Waiver This waiver allows for states to serve meals outside of the standard group setting. Recognizing the importance of social distancing, FNS is allowing for school districts to set up alternative sites and meal delivery mechanisms to ensure that safety measures are in place while still providing meals to children. All 50 states and the District of Columbia have been approved for this waiver.
- Nationwide Parent/Guardian Meal Pick-Up Waiver Allows parents/guardians to pick up meals for their children without a child needing to be present. All 50 states and the District of Columbia have been approved for this waiver.
- Fresh Fruit and Vegetable Program (FFVP) The FFVP is a federally assisted program that provides free fresh fruits and vegetables to children at eligible elementary schools during the school day. Similar to the parent/guardian meal pick-up waiver, this waiver allows for the parent or guardian of a child who receives fresh fruit and vegetables under FFVP to pick up food without a child being present. Twenty states and the District of Columbia have been approved to waive these requirements.
- Area Eligibility Summer Food Service Program (SFSP) / Seamless Summer Option (SSO) This waiver removes the requirement that open food sites providing meals during the summer under SFSP and SSO must be located in areas where at least 50 percent of NSLP participants are eligible for free or reduced-price meals. By providing this flexibility, USDA-FNS are recognizing the hardships placed on many communities across the country and continue federal funding for emergency meals through the summer for school districts who would not typically qualify. All 50 states and the District of Columbia have been approved for this waiver.
- Pandemic EBT The Families First Coronavirus Response Act of 2020⁷ provided the Secretary of Agriculture with the authority to approve state requests to operate a Pandemic Electronic Benefits Transfer (P-EBT) program. The program, which was originally authorized in 2010 in response to the H1N1 pandemic, provides temporary food benefits to students who would have received free or reduced-price meals if their schools were open. States in the contiguous U.S. can provide up to \$5.70 in daily benefits for each student who would otherwise receive free or reduced-price school meals. State participation in P-EBT is optional and 45 states and the District of Columbia have been approved to operate a Pandemic EBT program as of July 1, 2020.

State & Local Actions

- A number of school districts are moving away from the federal meal programs to state-based programs to gain greater flexibility to distribute meals to all children, regardless of their status as a student. By offering meals to all children, school districts are helping to decrease food insecurity among children regardless of if they attend public schools.
- States are using a hybrid approach of providing meals at grab and go sites at a location (often a school) and delivery via school buses. Some school districts are determining bus routes based on areas with the greatest need or follow regular routes to ensure familiarity with their locations. Bus routes can increase access to meals by making it more convenient for children to pick up meals.
- Some schools are delivering meals directly to children's homes. This is most prominent in rural areas where grab
 and go sites may not be feasible for many families.
- Schools have varying approaches in terms of the number of meals provided. Some states only distribute two meals (breakfast and lunch) per day, other states are providing more than one day's worth of meals, and others are providing a full week's worth of meals to families in a single visit. Through providing multiple meals at once, school districts can decrease contact and potential spread of COVID-19 and make it more convenient for families who are receiving the meals.

School Districts in Action

- The Austin Independent School District (AISD) in Texas prepares and provides meals for children under the age of 19 and students over the age of 19 who utilize special education resources at more than 70 locations. Beginning May 19, 2020, AISD began providing meals to caregivers accompanying children to meal distribution sites but had to stop doing so due to capacity issues. In addition to offering curbside meal pickup at 18 school locations, AISD offers meals that are delivered by school buses that visit over 51 locations. Bus stop sites were chosen based on 50 percent or more students receiving free or reduced-price meals.⁸
- The Norristown Area School District (NASD) in Pennsylvania provides five breakfasts and five lunches to students available once a week. Meals are distributed at two sites, one that provides walk-up service and another site that is for drive-thru only. Meals are available to students and any siblings under the age of 18. NASD does not require that students be physically present when parents pick up meals. As of April 15, 2020, about 206,000 meals have been distributed to NASD families.⁹
- Belen Consolidated Schools (BCS) in New Mexico provides meals to students via grab and go sites at schools and delivery by school buses along regularly scheduled elementary morning bus routes. Meals are available to all children in households under the age of 18.¹⁰
- Cincinnati Public Schools distributes meals to students across 24 sites on Mondays, Wednesday and Fridays. Four meals (two breakfasts and two lunches) are provided on Mondays and Wednesday, and two meals on Fridays. Children do not need to be present with their family for meal pickup. As of April 15, 2020, over 100,000 meals have been served during the COVID-19 school closures.¹¹

RECOMMENDATIONS: ACTION STEPS TO CONTINUE AND EXPAND STUDENT ACCESS TO NUTRITIOUS FOODS DURING THE COVID-19 RESPONSE

Supplement school meal programs: While the P-EBT program has been welcomed by many states across the country to help address growing food insecurity amongst children and families during the COVID-19 pandemic, only a small percentage of children are actually receiving these benefits. A recent analysis has shown that only 15 percent of eligible children had received benefits and just 12 states have started sending money to families. While the benefits are retroactive, many families across the country need access to P-EBT benefits now to ensure that their children do not go hungry. Additionally, this benefit ended once the 2019-2020 school year finished in each of the states that have been approved to provide P-EBT benefits. With many school districts in the midst of finalizing plans for modified schedules for the 2020-2021 school year, there is significant uncertainty about students' regular access to school meals when schools come back in session in Fall 2020.

• Recommendation: Congress should extend the P-EBT program through summer 2020 and 2020-2021 school year to ensure that students who rely on meals at schools, camps, or recreation centers continue to have access to healthy, nutritious meals. Congress should also modify the requirement that schools must be closed for five consecutive days in order for students to be eligible for P-EBT as schools will have heavily modified schedules that may make it difficult for children to regularly access meals despite schools being opened.

Ensure food service worker safety: School districts must take actions to decrease risk of getting COVID-19 for those working at food distribution sites, including providing them with personal protective equipment (PPE) and limiting contact with children. Some school districts have had to halt their food distribution programs after food service workers or volunteers tested positive for COVID-19.

• Recommendation: Provide PPE for food service workers and other staff handling meal preparation and distribution. Many food service staff fear for their safety going to work, and some feeding sites have opted to close because staff contracted COVID-19. The Coronavirus Aid, Relief, and Economic Security (CARES) Act included money for schools to purchase cleaning and sanitation supplies, which can include PPE for food service workers. However, more help is needed and the federal government must make it clear that school food service programs are eligible for these CARES Act funds. These food service workers are on the frontline feeding the community and must be protected with masks and gloves at the minimum.

Align and support other assistance programs: In light of the devastating economic impact of COVID-19, it is important for schools to be proactive in helping families sign up for free and reduced lunch programs.

• Recommendation: For schools that do not participate in the Community Eligibility Provision (CEP), they should distribute school meal applications and actively encourage parents to apply for the National School Lunch Program. Additionally, state agencies responsible for providing other benefits to families, such as Unemployment Insurance (UI), Temporary Assistance for Needy Families (TANF), or Supplemental Nutrition Assistance Program (SNAP), should ensure that parents or guardians are aware of all of the child nutrition programs administered by USDA and available to families nationwide.

Provide funding relief for school nutrition programs: Many school districts across the country maintained or incurred more expenses than normal (i.e. labor, transportation) while seeing a significant decrease in revenues from reduced meal participation during school closures. The School Nutrition Association recently published results from a May 2020 survey of school nutrition directors that showed that over 67 percent (n=1755) of those surveyed were operating at a financial loss in school year 2019-2020. The survey also showed that financial losses to school nutrition programs was the highest ranked concern.

• **Recommendation:** In order to sustain these essential child nutrition programs while protecting jobs and district educational funds, Congress should provide additional funding to make student nutrition programs financially solvent.

Provide continued flexibility to bolster food distribution programs: Given the uncertainty of schools opening in time for the traditional start of the school year, (i.e. the need to address students' nutritional needs may continue into Fall 2020), it is important for the USDA, in collaboration with local education authorities and state education agencies, to analyze food distribution programs to ensure they are following best practices and ensuring access for food insecure children.

• **Recommendation:** USDA should analyze how states and school districts effectively utilized the regulatory waivers granted to them to help guide additional, repeat, or modified regulatory flexibilities that may be needed at the beginning of the next school year.

SUPPORTING CHILDHOOD NUTRITION BEYOND SCHOOL-BASED PROGRAMS

While this brief focuses on changes to school nutrition programs in face of COVID-19, there are also non-school meal programs that affect child health that Congress should consider when determining how to best support childhood nutrition during the on-going response to the pandemic:

- Increase access to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). WIC services are effective at improving health outcomes throughout pregnancy and early childhood. To make sure we are covering all vulnerable populations, especially during the pandemic, Congress should expand access by increasing child eligibility to age six, increasing postpartum eligibility to two years, and extending infant and child certification periods to two years. These steps will address existing nutrition gaps and reduce duplicative paperwork requirements on both participants and service providers.
- Increase benefits for fruit and vegetable purchases through WIC. The January 2017 report from the National Academies of Sciences, Engineering, and Medicine (NASEM) recommended increasing the value of WIC's Cash Value Benefit (CVB), which offers participants between \$9-\$11 per month to purchase a variety of fruits and vegetables. With shortages of WIC items in grocery stores, increasing the CVB value will ensure that WIC participants will have sustained access to nutritious foods throughout the public health emergency.
- Provide emergency funding to support Child and Adult Care Feeding Program (CACFP) childcare and after school providers and sponsors.
- SNAP has continually shown to be a positive boost to the economy. Each \$1 of SNAP benefits during a downturn generates between \$1.50 and \$1.80 in economic activity. Participants spend those benefits quickly, with positive impacts felt up and down the food chain -- from farmers and food producers, to grocery retailers, stock clerks and local economies. Strengthen SNAP by increasing the maximum benefit available to all households by 15 percent and increasing the minimum benefit from \$16 to \$30 through the longer-term economic downturn, rather than the immediate public health emergency, and delay the implementation of proposed and final rules that the Administration has issued for SNAP.¹⁴
- Allow SNAP Education (SNAP-Ed) providers to help with meal distribution and SNAP outreach/enrollment. In situations where gaps exist, SNAP-Ed providers may also assist with food distribution approaches at various sites including, but not limited to: schools, senior meal programs, emergency food providers, and the Federal Emergency Management Agency (FEMA). SNAP-Ed reaches large numbers of low-income households at risk for COVID-19 due to pre-existing conditions and is also well situated to accelerate SNAP and P-EBT enrollment. However, they are unable to do so due to operational challenges under existing statutory authority. A nationwide waiver with no match requirement should be provided to allow SNAP-Ed to support SNAP enrollment efforts, including P-EBT and other food assistance programs designed for families and communities. Additionally, adequate resources should be provided for increased need to enhance and highlight best practices, resources, and case studies that showcase innovative approaches in a virtual environment.

	Mool Time	Mool Pottow	Non oordestata	Parent/Guardian	Fresh Fruit	ent as of July 1, 2020 Area Eligibility Summer	
States	Meal Times Waiver	Meal Pattern Waiver	Non-congregate feeding waiver	Meal Pick-up Waiver	and Vegetable Program	Food Service Program (SFSP)/Seamless Summer Option (SSO)	Pandemic EBT
Alabama	✓	✓	✓	✓	✓	✓	✓
laska	✓	✓	✓	✓		✓	✓
rizona	✓	✓	✓	✓	✓	✓	✓
Arkansas	✓	✓	✓	✓	✓	✓	✓
California	✓	✓	✓	✓	✓	✓	✓
Colorado	1	✓	✓	✓	✓	✓	✓
Connecticut	1	1	✓	✓	✓	✓	1
Delaware	1	✓	✓	✓	✓	✓	1
D.C.	/	✓	✓	✓	✓	1	/
Torida	/	1	/	/		✓	/
Georgia	/	/	/	√ ·		✓	/
lawaii	/	/	/	/	/	,	/
daho	/	/	/	1		√	·
llinois	√	/	/	/	/	√	/
ndiana	√	/	√	√	√	√	√
owa	√	/	√	√	√	√	√
Kansas	√	/	<i>y</i>	✓ ✓	V	√	√
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Maryland	√	/	<i>\</i>	<i>\</i>	√	√	/
Massachusetts	√	√	√	√		√	/
/lichigan	√	/	<i></i>	√		✓	/
/linnesota	/	√	✓	√	✓	✓	✓
/lississippi	/	√	✓	√		✓	✓
Missouri	1	✓	✓	✓		✓	✓
Montana	✓	✓	✓	✓		✓	
Nebraska	✓	✓	✓	✓		✓	✓
Nevada	✓	✓	✓	✓		✓	
New Hampshire	✓	✓	✓	✓	✓	✓	✓
lew Jersey	✓	✓	✓	✓	✓	✓	✓
lew Mexico	1	✓	✓	✓		✓	✓
lew York	✓	✓	✓	✓		✓	✓
lorth Carolina	✓	✓	✓	✓		✓	✓
lorth Dakota	1	✓	✓	✓		✓	✓
hio	1	✓	✓	✓		✓	✓
Oklahoma	1	1	✓	✓		✓	
)regon	1	1	1	1		✓	1
Pennsylvania	1	1	1	1	✓	✓	/
Rhode Island	/	/	/	· ✓	/	✓	/
South Carolina	/	/	/	√		· /	/
South Dakota	/	/	/	<i>'</i>	/	· /	/
ennessee	/	/	/	1		· ✓	/
exas	√	/	/	√	/	√	/
Itah	√	/	/	<i>'</i>	1	√	•
ermont	√	/	√	√	√	√	✓
'irginia	√	<i>\</i>	✓ ✓	✓ ✓	•	√	√
Vashington	✓ ✓		✓ ✓	✓ ✓		√	
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Visconsin Vyoming	√ √	√ √	√ √	√ √	✓	√ √	√ √
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Endnotes

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- 13 School Nutrition Association. Impact of COVID-19 on School Nutrition Programs: Part 2 Accessed on June 15, 2020. Available at: https://schoolnutri-12 DeParle J. Hunger Program's Slow Start Leaves Millions of Children Waiting. New York Times. Published on May 26, 2020. Accessed on May 27, tion.org/uploadedFiles/11COVID-19/3_Webinar_Series_and_Other_Resources/COVID-19-Impact-on-School-Nutriction-Programs-Part2.pdf
- 14 USDA has proposed several rules that would further reduce SNAP enrollment by: tightening criteria by which states request waivers from time limits or certain work requirements; restrict SNAP's broad-based categorical eligibility option, which allows states to enroll residents in SNAP when they apply for other income-based programs; and standardize the method for determining state standard utility allowances. For more information on this rule and TFAH's comments on the proposed rules, visit: https://www.tfah.org/list-page?type=a-and-a&bucket=letters&issue=obesity
- 15 U.S. Department of Education, National Center for Education Statistics. Table 204.10 Number and percentage of public school students eligible for free or reduced-price lunch, by state: Selected years, 2000-01 through 2016-17. Accessed on May 15, 2020. Available at: https://nces.ed.gov/programs/digest/d18/tables/dt18_204.10.asp?current=yes



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