



# Child Nutrition Program Operations During the COVID-19 Pandemic, July 2021 through September 2022

School Meals Operations Study, Year 3 Report (Final)

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March 2025

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# Child Nutrition Program Operations During the COVID-19 Pandemic, July 2021 through September 2022

**March 2025**

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## Executive Summary

The Child Nutrition Programs offered by the U.S. Department of Agriculture’s Food and Nutrition Service (FNS) help ensure that children in families with low incomes do not go hungry and have access to safe, nutritious foods in school and other settings. FNS oversees these programs, and State agencies administer them through agreements with local program operators that implement the programs in schools and other settings.

FNS assesses school meal operations on a school year (SY) basis with the School Meals Operations study. The study was modified during the COVID-19 public health emergency—the largest nationwide disruption of the school meals programs since they were enacted. When the pandemic began in March 2020, the Families First Coronavirus Response Act authorized FNS to establish waivers to provide meals under the Child Nutrition Programs with appropriate safety measures. With this authority, FNS issued nationwide waivers of certain program rules to allow States and local program operators to serve meals to children who were no longer routinely in school buildings due to the pandemic. The Child Nutrition Programs used to provide meals to children during the pandemic were the National School Lunch Program (NSLP), School Breakfast Program (SBP), NSLP Seamless Summer Option (SSO), Summer Food Service Program (SFSP), and Child and Adult Care Food Program (CACFP).

This report summarizes findings from the third year of the School Meals Operations Study, which gathered information from State agencies on Child Nutrition Program operations and waiver use from July 2021 through September 2022. This time period includes the SY that began in July 2021 and ended in June 2022. This report focuses on findings related to the 29 COVID-19 Child Nutrition nationwide waivers and waiver extensions that FNS approved for use during this time. The passage of the Keep Kids Fed Act on June 30, 2022 extended certain flexibilities, summarized in [Box ES.1](#).

Key findings include:

- In-person learning was the primary mode of instruction nationwide during SY 2021–2022, similar to the previous school year. According to State agencies, cafeteria service was the most frequently used meal delivery method. Sixty-nine percent of State agencies reported that School Food Authorities (SFAs) used cafeteria service to serve NSLP, SBP, and SSO meals, whereas cafeteria service was slightly less prevalent among SFSP sponsors and CACFP institutions.<sup>1</sup> When SFAs were not using cafeteria service, they most commonly used grab-and-go service in school buildings, curbside pick-up or drive-through services, or meal service in the classroom.
- During SY 2021–2022, most local program operators used SSO to provide meals to students. Correspondingly, the most meals served among the Child Nutrition Programs were in SSO. This was

### Box ES.1. Key relevant provisions of the Keep Kids Fed Act

- Extending nationwide flexibilities to summer meal programs through September 2022, allowing sites to continue serving meals in all areas at no cost
- Providing schools with an additional temporary reimbursement of 40 cents per lunch and 15 cents per breakfast, and child care centers with an additional 10 cents per meal
- Equipping USDA with additional flexibilities to support schools as needed based on their local conditions

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<sup>1</sup> The percentage shown is the percent of State agencies that reported “about half”, “more than half” or “all” local program operators used the method.

likely due to the availability of the Nationwide Waiver to Allow SFSP Reimbursement Rates in SY 2021–2022, which allowed local program operators to claim SSO meals and snacks at the higher SFSP reimbursement rates. This SFSP Reimbursement for SSO waiver and the SSO Operations waiver, which allowed local program operators to continue serving free SSO meals to all children in non-summer months, were among the most frequently used waivers in SY 2021–2022.

- The number of meals in July 2022 was comparable to the number in July 2019 (before the start of the COVID-19 pandemic), and substantially lower than the number of meals served in July 2020 and July 2021.
- Most of the flexibilities extended as part of the Keep Kids Fed Act expired at the end of September 2022. Thus, at the beginning of SY 2022–2023, schools returned to serving meals through NSLP and SBP. In August and September 2022, NSLP and SBP had the highest levels of local program operator participation, child participation, and meals served among the Child Nutrition Programs.
- All or nearly all State agencies used the Parent and Guardian Pick-up, Meal Time Requirements, and Non-congregate waivers, which allowed schools and child care centers to provide safe meal service to children. As in previous years when the waivers were in place, these access-focused waivers continued to be among the most used. State agencies consistently reported that these waivers reduced barriers to children receiving meals, increased participation, and improved children’s safety.
- Onsite monitoring waivers, which provided State agencies and local program operators flexibilities with onsite monitoring requirements, continued to be widely used in SY 2021–2022 and increased State agencies’ ability to adapt oversight measures, provide technical assistance to local program operators, and focus administrative resources on priority areas.
- Most State agencies continued to experience operational challenges and challenges implementing or using the waivers, while fewer experienced financial challenges. The percentage of State agencies reporting challenges increased slightly in SY 2021-2022 compared to previous years. Untimely and unclear guidance from FNS were the most common factors contributing to operational challenges. State agencies most frequently reported that information technology (IT) system changes and increased staff hours contributed to their financial challenges. Slow guidance from FNS and staff burden contributed to State agencies’ challenges with implementing or using the waivers, however, many of the State agencies were able to overcome them. State agencies most frequently reported that collaborating with local program operators and other State agencies helped them overcome these challenges.

## **I. Introduction**

This report summarizes findings from the School Meals Operations Study (SMO), part of an ongoing series to assess school meal operations on a school year (SY) basis. This volume of the study covers July 2021 through the end of September 2022 and includes SY 2021-2022.

When the COVID-19 pandemic began in March 2020, the Families First Coronavirus Response Act of 2020 (P.L. 116-127) allowed the U.S. Department of Agriculture Food and Nutrition Service (USDA FNS) to establish nationwide waivers for the Child Nutrition Programs to provide meals and take appropriate safety measures. FNS used SMO to gather information about Child Nutrition Program operations as well as statutorily required information on the COVID-19 Child Nutrition nationwide



waivers. Prior reports for this study series summarize findings for March through September 2020<sup>2</sup> and July 2020 through December 2021.<sup>3</sup>

The waivers discussed in this report include those that were newly authorized for use during SY 2021–2022 as well as the waiver extensions authorized for use during this time. A full list of waivers and waiver extensions can be found in [Exhibit A.1](#). The waivers that were active in 2022 were set to expire on June 30. However, on June 24, 2022, Congress passed the Keep Kids Fed Act, which extended certain flexibilities and provided other supports as State agencies and local program operators transitioned to meal service without most of the waivers that had been in place for the past three years.<sup>4</sup> A key provision in the bill extended nationwide flexibilities to summer meal programs through September 2022, allowing sites to continue serving meals in all areas, at no cost to families.

This report summarizes findings related to meal service methods in SY 2021–2022, summer 2022, and fall 2022, Child Nutrition Program participation and meals served, use of the waivers and how they improved services to children, and meal service challenges.

## A. Background

FNS' Child Nutrition Programs help ensure that children in families with low incomes do not go hungry and have access to safe, nutritious foods at school and in other settings. The Child Nutrition Programs discussed in this report are the school meal programs, which include the National School Lunch Program (NSLP) and the School Breakfast Program (SBP); the summer meal programs, which include the NSLP Seamless Summer Option (SSO) and the Summer Food Service Program (SFSP); and the Child and Adult Care Food Program (CACFP). In the decade preceding the COVID-19 pandemic, the NSLP, which is the largest of these programs, served about 5 billion meals to about 30 million children annually.<sup>5</sup>

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

The FFCRA provided FNS with the authority to establish waivers to allow the Child Nutrition Programs to provide meals and take appropriate safety measures. Under this authority, FNS issued nationwide waivers of certain Child Nutrition Program rules that provided State agencies and local program operators with meal service flexibilities in response to the pandemic. The FFCRA required States to report on their use of the waivers and whether the waivers improved services to children.

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<sup>2</sup> Severn, Veronica, Liana Washburn, Rachel Frisk, and Kevin Conway. "Child Nutrition Program Operations During the COVID-19 Pandemic, March through September 2020: School Meals Operations Study (SMO) Year 1 Report." Prepared by Mathematica, Contract No. 12319819A0009/12319819F0162. U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 2022.

<sup>3</sup> Washburn, Liana, Veronica Severn, Brett Eiffes, Katie Niland, Leah Jennings, and Kevin Conway. "Child Nutrition Program Operations During the COVID-19 Pandemic: School Year 2020–2021, Summer 2021, and Fall 2021." Prepared by Mathematica, Contract No. AG-3198-B-16-0004/12319819F0021. U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 2023.

<sup>4</sup> U.S. Congress. "S.2089—Keep Kids Fed Act of 2022." Pub. Law 117-158. June 25, 2022. <https://www.congress.gov/bill/117th-congress/senate-bill/2089/text/eas>. Accessed June 6, 2024.

<sup>5</sup> Food and Nutrition Service. "National Level Annual Summary Tables: FY 1969–2023, National School Lunch—Participation and Meals Served." 2024. <https://fns-prod.azureedge.us/pd/child-nutrition-tables>. Accessed June 7, 2024.

FNS issued the first set of Child Nutrition nationwide waivers in March 2020. As the pandemic progressed, FNS extended some waivers beyond the period for which they were initially authorized, allowed other waivers to expire, and issued new waivers. The focus of this report is June 2021 to October 2022. A list of waivers authorized for use during this period can be found in Appendix A.

The Seamless Summer Option 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. In this report, the term local program operator is used to refer broadly to these implementing entities.

## B. Data collection

In the third year of this study, the 68 State agencies that administer NSLP, SBP, SSO, SFSP, and CACFP in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands<sup>6</sup> provided survey data and administrative records data. The survey was fielded from October 2022 through January 2023 and gathered information to satisfy the FFCRA reporting requirements for the COVID-19 Child Nutrition nationwide waivers, including the use of four waivers newly authorized for use during SY 2021–2022 and summer 2022. 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.<sup>7</sup> For certain waivers, FNS identified specific actions that State agencies and local program operators 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 that (1) meals were distributed only to parents and guardians of eligible children and (2) duplicate meals were not distributed to any child.

The survey also included questions about challenges State agencies experienced during SY 2021–2022 and summer 2022. The administrative data collection gathered information on program participation and meals served in NSLP, SBP, SSO, SFSP, and CACFP from October 2021 through September 2022. 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; for 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 that State agencies submit the data elements collected on these forms disaggregated at the site or local program operator level, depending upon the level available from the State agency.

Appendix B contains additional information about the data collection methods used for this report and limitations of the data.

## C. Organization of report

Chapter II describes meal service methods during SY 2021–2022 and summer 2022 and discusses the number of meals served to children and the Child Nutrition Programs used to serve meals over the study

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<sup>6</sup> In some States, more than one State agency administers NSLP, SBP, SSO, SFSP, and CACFP.

<sup>7</sup> U.S. Congress. “Families First Coronavirus Response Act.” Pub. Law 116-127, 134 Stat. 185. March 18, 2020.

time period. Changes in meals served from October 2019–September 2022 are also presented in Chapter II. Chapter III discusses the use of the COVID-19 Child Nutrition nationwide waivers and how they improved services to children. Chapter IV discusses meal service challenges State agencies experienced and how they overcame the challenges. Chapter V provides an overview of the upcoming year of this study. [Box I.1](#) below describes the time periods covered in this report. The appendices provide supplemental information and exhibits.

**Box I.1. Time period covered in the third report in the School Meal Operations Study series**

The third year of this study primarily focuses on SY 2021–2022, summer 2022, and the beginning of SY 2022–2023.

Changes over time are also discussed in this report. The findings presented to show changes over time spanning the first three study years, from October 2019 before COVID-19, through September 2022, the start of SY 2022–2023.

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## II. Meal Service and Child Nutrition Program Participation, and Changes Over Time

During SY 2021–2022, most schools operated in person and used traditional cafeteria service to serve meals. Under normal operations, SSO provides a streamlined option for schools to transition to providing meals during the summer months when schools are not in session. Meals served through SSO must follow NSLP and SBP meal pattern requirements. Non-school sites use SFSP to provide meals to children during the summer. SFSP has a simpler meal pattern than SSO and a slightly higher reimbursement rate. Schools may also operate SFSP, though many choose to use SSO because it requires less administrative effort if they are already operating NSLP. From March 2020 to September 2022, waivers allowed schools to use SSO or SFSP for meal service during non-summer months.

Meals served through SSO are typically reimbursed at the NSLP and SBP rates, which are lower than the corresponding reimbursement rates for SFSP. However, in SY 2021–2022, the Nationwide Waiver to Allow SFSP Reimbursement Rates in SY 2021–2022 allowed SFAs to claim SSO meals and snacks at the higher SFSP reimbursement rates.<sup>8</sup> This waiver was initially authorized for use beginning in July 2021 and was subsequently extended through September 2022. The result was an immediate and substantial increase in the use of SSO and a corresponding drop in the use of SFSP.

### A. Meal service methods in SY 2021–2022 and summer 2022

More than two-thirds (69 percent) of State agencies reported that their SFAs operating NSLP, SBP, and SSO used cafeteria service.<sup>9</sup> The next most common meal delivery methods among these programs were grab-and-go service in school buildings, curbside pick-up or drive-through services, and meal service in the classroom (Appendix [Exhibit C.1](#)). [Box II.1](#) lists the top four meal service methods used by SFAs during SY 2021–2022 and summer 2022.

#### Box II.1. Top four meal delivery methods used by SFAs during SY 2021–2022 or summer 2022

1. Cafeteria service
2. Grab-and-go service in school buildings
3. Curbside pick-up or drive-through services
4. Meals in the classroom

Cafeteria service was also the most common meal delivery method among SFSP sponsors, with 40 percent of State agencies reporting that about half or more of their sponsors used it (Appendix [Exhibit C.2](#)). Among institutions operating CACFP, curbside pick-up or drive-through service was the most common meal delivery method. Nineteen percent of State agencies reported that the majority of CACFP institutions used this method (Appendix [Exhibit C.3](#)). Chapter III discusses the waivers that allowed these methods and how they were used during SY 2021–2022 and summer 2022.

Alternative meal options through which local program operators provided multiple meals at once, weekend meals, bulk food packages, frozen meals, or shelf-stable meals were less frequently used in SY

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<sup>8</sup> Maskornick, J. K. “Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates for the Seamless Summer Option in Summer 2022.” Memorandum to Regional Directors, Special Nutrition Programs, and State Directors, Child Nutrition Programs, June 30, 2022.

<sup>9</sup> The percentage shown is the percent of State agencies that reported “about half”, “more than half” or “all” local program operators used the method.

2021–2022 and summer 2022 than the previous year. More than 70 percent of State agencies reported that fewer than half or none of their local program operators served alternative meal options (Appendix [Exhibit C.4](#)), compared with about 50 percent to 70 percent during SY 2020–2021 (Appendix [Exhibit C.5](#)).

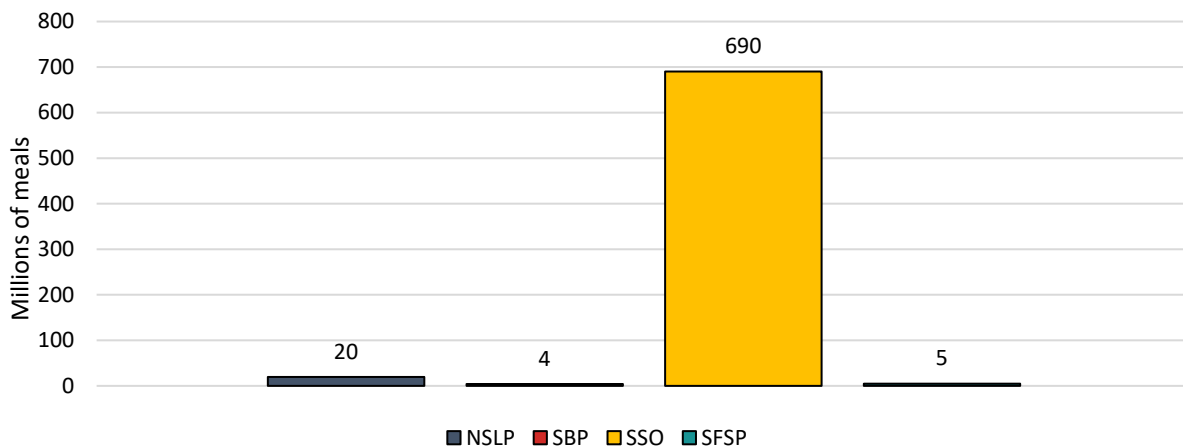
## B. Meals served in the Child Nutrition Programs, October 2021–September 2022

This section provides information on the number of meals served in NSLP, SBP, SSO, and SFSP during three time periods during October 2021–September 2022 (Appendix [Exhibit C.6](#)). Section B.1 discusses the monthly average number of meals served during SY 2021–2022, defined here as October 2021 through June 2022. Section B.2 discusses the number of meals served during summer 2022, defined as July 2022. Section B.3 discusses the monthly average number of meals served during the beginning of SY 2022–2023, defined as August and September 2022. The patterns in local program operator participation and child participation during these time periods correspond to the number of meals served in terms of which Child Nutrition Programs had the most meals served (Appendix [Exhibits C.7](#) and [C.8](#)). Section B.4 discusses changes in numbers of meals served from October 2019–September 2022 (Appendix [Exhibits C.9](#) and [C.10](#)).

### 1. School Year 2021–2022

During SY 2021–2022, an average of 690 million meals per month were served through SSO, making this the Child Nutrition Program with the most meals served by a wide margin. [Exhibit II.1](#) also shows that SSO was followed by NSLP, with an average of 20 million meals served per month. Fewer meals were served through SFSP and SBP: 5 million and 4 million, respectively (Appendix [Exhibit C.6](#)). As noted, the availability of the waiver to allow meals served through SSO to be claimed at the higher SFSP reimbursement rate likely explains why so many SFAs used SSO during SY 2021–2022.

**Exhibit II.1. Average monthly meals served in Child Nutrition Programs, October 2021 through June 2022**



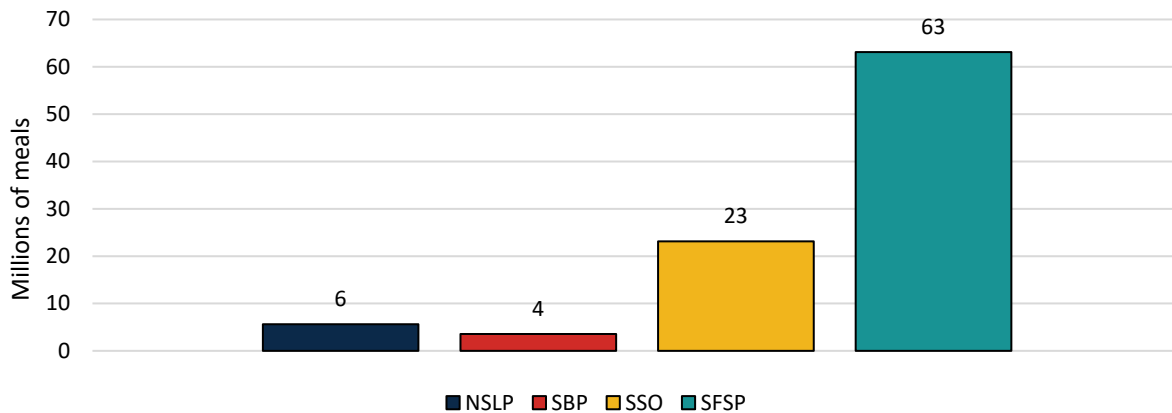
Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2022.

Note: All 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands provided the SFA- or sponsor-level data in this exhibit.

## 2. Summer 2022

During July 2022, most schools were closed for the summer, and summer meal sites opened. Schools that remained open in the summer or provided summer meals likely continued using SSO, whereas other types of summer meal providers used SFSP. As shown in [Exhibit II.2](#), in July 2022, most meals (63 million) were served through SFSP; 23 million were served through SSO; and an additional 10 million meals were served through NSLP and SBP (Appendix [Exhibit C.6](#)).

**Exhibit II.2. Meals served in Child Nutrition Programs, July 2022**



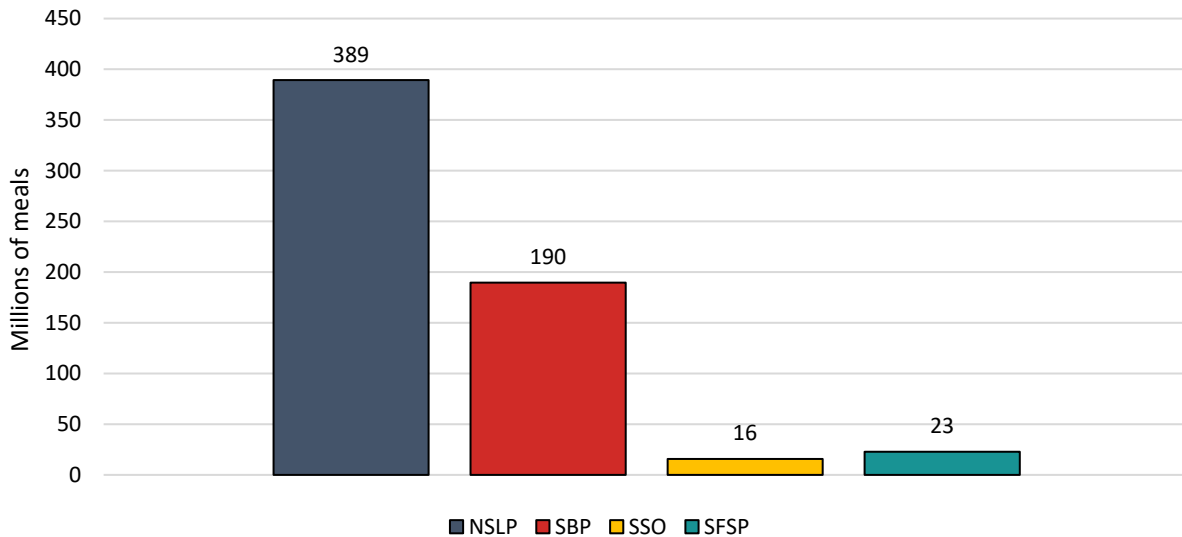
Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2022.

Note: All 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands provided the SFA- or sponsor-level data in this exhibit.

## 3. Fall 2022

As SY 2022–2023 started in August and September 2022, NSLP and SBP became the predominant programs in operation and the use of SSO and SFSP declined. By September, the last month when SFAs were allowed to use SSO and SFSP to serve meals in schools, almost all SFAs had transitioned back to serving meals and snacks through NSLP and SBP (Appendix [Exhibit C.6](#)). This trend is reflected in the number of meals served, shown in [Exhibit II.3](#). An average of 389 million meals were served each month in NSLP, whereas 190 million were served in SBP, 23 million in SFSP, and 16 million in SSO.

**Exhibit II.3. Average monthly meals served in Child Nutrition Programs, August and September 2022**



Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2022.

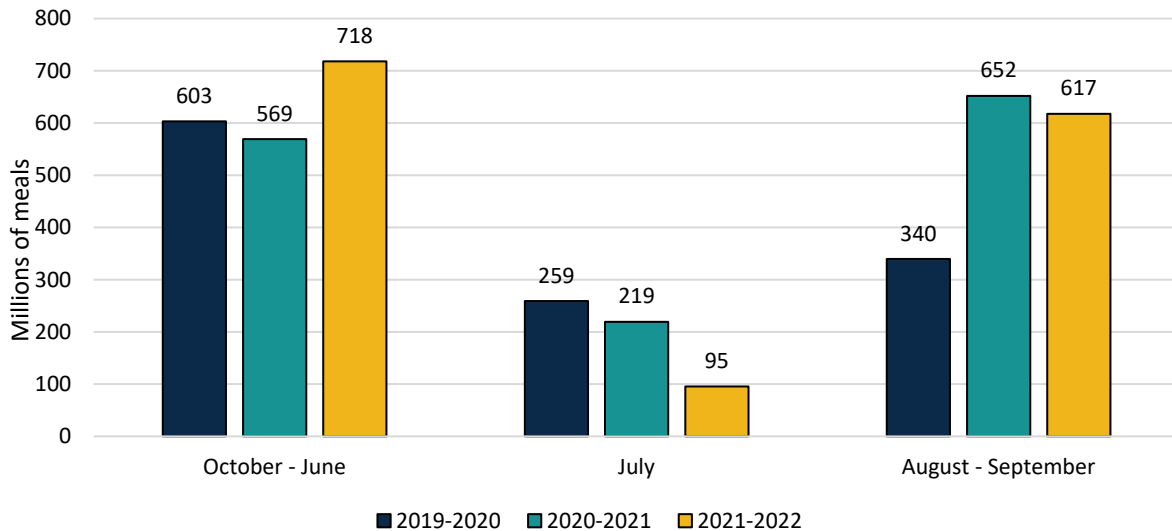
Note: All 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands provided the SFA- or sponsor-level data in this exhibit.

### C. Changes in meals served in the Child Nutrition Programs during the first three years of the COVID-19 pandemic

[Exhibit II.4](#) shows the average number of meals served each month in NSLP, SBP, SSO, and SFSP combined for the first three years of this study. The data are separated into three distinct time periods: October through June, representing the majority of each school year; July, representing the summer; and August through September, representing the start of the next school year.



**Exhibit II.4. Average monthly meals served in NSLP, SBP, SSO, and SFSP during the first three years of the COVID-19 pandemic**



Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal years 2020, 2021, and 2022.

Note: All 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands provided the SFA- or sponsor-level data in this exhibit.

This study series began in October 2019, before the COVID-19 pandemic. During SY 2019–2020, an average of 603 million meals were served each month. The number of meals served dipped during the subsequent school year, and then rebounded to surpass the first year in the series, with an average of 718 million meals served each month in SY 2021–2022.

July 2020 was noteworthy for summer meal programs, with 259 million meals served in NSLP, SBP, SSO, and SFSP. This is substantially higher than in a typical summer. For example, in July 2019, about 84 million meals were served in SSO and SFSP (not shown in the exhibit).<sup>10</sup> The number of meals served in July decreased in the subsequent years, and by 2022 had returned to a pre-pandemic level, with 95 million meals served.

As shown in [Exhibit II.4](#), the number of meals served in August and September, when a new school year was beginning, was far lower in 2020 than in subsequent years. In fall 2020, when the COVID-19 pandemic was causing substantial disruption to school operations including food service, an average of 340 million meals were served. The average number of meals served was much higher in the two following years, with 652 million and 617 million meals served each month on average in fall 2021 and 2022, respectively ([Appendix Exhibits C.6, C.9, and C.10](#)).

<sup>10</sup> Food and Nutrition Service. “Program Information Report (Keydata) U.S. Summary, FY 2019–FY 2020.” U.S. Department of Agriculture, Food and Nutrition Service, 2020.

### III. Use of COVID-19 Child Nutrition Nationwide Waivers to Improve Services to Children, and Changes Over Time

In response to the ongoing pandemic, FNS issued additional COVID-19 Child Nutrition nationwide waivers and extended several existing waivers to support successful school reopening in SY 2021–2022 and to promote afterschool and child care programs.<sup>11</sup> State agencies and local program operators used these waivers to improve children’s access to meals and provide flexibility in the administration and operation of the Child Nutrition Programs. The Child Nutrition Programs used to provide meals to children during this time included SSO, NSLP, SBP, SFSP, and CACFP. This chapter presents findings on the use of the nationwide waivers and how they contributed to improving services for children during SY 2021–2022 and summer 2022. Appendix A provides the complete list of active waivers during this time.

#### A. Access-focused waivers

As more schools reopened for in-person instruction in SY 2021–2022, State agencies and local program operators used several access-focused waivers (see [Box III.1](#)) to continue serving meals to children under the Child Nutrition Programs with appropriate safety measures (Appendix [Exhibit D.1](#)). Some of the nationwide waivers helped local program operators implement U.S. Centers for Disease Control and Prevention recommendations for safe school meal service, which included serving meals outdoors or inside classrooms.<sup>12</sup>

##### 1. SSO Operations waiver

As noted in Section II.C.1, most meals and snacks were provided to children through SSO during SY 2021–2022 and summer 2022. In a typical year, SFAs may only provide SSO meals during the summer and school vacations. The SSO Operations waiver allowed SSO meals to be served to children at no cost during the regular school year.

**Box III.1. Most-used access-focused waivers**

**SSO Operations waiver.** Allowed local program operators to operate SSO during non-summer months.

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

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

**Meal Time Requirements waiver.** Allowed meals to be served to children outside traditional times to maximize flexibility for meal pickup.

**Meal Pattern Flexibility waiver.** Provided flexibility to serve meals that do not meet specified meal pattern requirements, when needed.

**Area Eligibility waiver.** Allowed local program operators, regardless of their location, to operate at-risk after-school care programs.

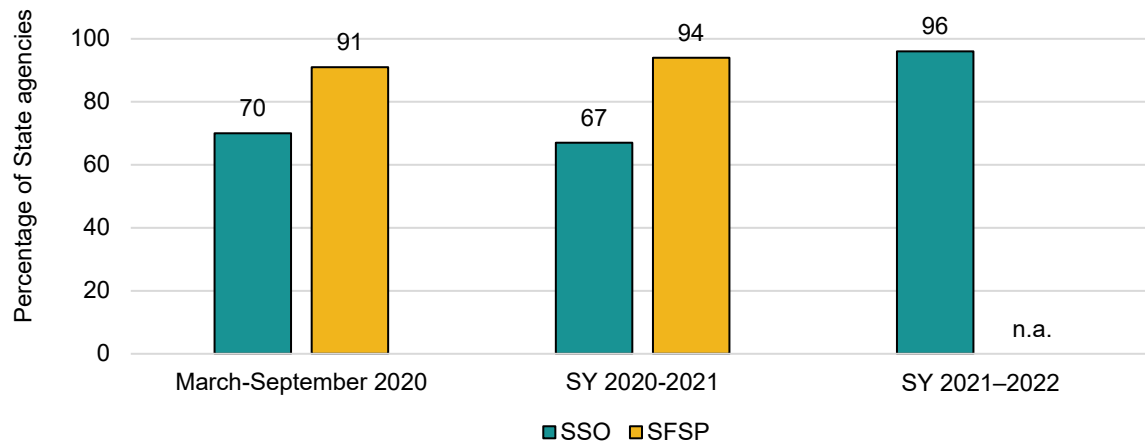
<sup>11</sup> Food and Nutrition Service. “SY 2021–2022 Waivers and Flexibilities.” 2023. <https://www.fns.usda.gov/disaster/pandemic/cn-2021-22-waivers-and-flexibilities>. Accessed June 5, 2024.

<sup>12</sup> U.S. Centers for Disease Control and Prevention. “Modifying School Spaces During Mealtimes to Reduce Spread of COVID-19.” 2021. <https://www.cdc.gov/healthyschools/covid/safely-distributing-meals.html>. Accessed June 5, 2024.

*I. SSO Operations waiver use*

Nearly all State agencies that administered SSO used the SSO Operations waiver in SY 2021–2022 (Appendix [Exhibit D.2](#)). Nationwide, State agencies reported that over 16,000 SFAs used the waiver (Appendix [Exhibit D.3](#)). Although the SSO Operations waiver was newly authorized in SY 2021–2022, it was similar in intent to the SSO and SFSP Operations waiver and the SFSP/SSO Unanticipated School Closure Operations waiver. These waivers were among the most used waivers in SY 2020–2021 and from March to September 2020, respectively. [Exhibit III.1](#) shows how use of these waivers changed throughout the pandemic. Early in the pandemic, most State agencies reported using the SFSP/SSO Unanticipated School Closure Operations waiver from March to September 2020 and the SSO and SFSP Operations waiver in SY 2020–2021. State agencies more frequently reported that local program operators used this waiver for SFSP than for SSO (Appendix [Exhibits D.4](#) and [D.5](#)). Unlike similar waivers from previous years, the SSO Operations waiver was not available for use with SFSP in SY 2021–2022.

**Exhibit III.1. Percentage of State agencies reporting that local program operators used the SSO Operations waiver or similar waivers in March–September 2020, SY 2020–2021, and SY 2021–2022**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022 and 2022–2023.

Note: Sixty-eight State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during SY 2021–2022. Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in March–September 2020 and SY 2020–2021. The waivers included here were used by local program operators.

n.a. = not applicable.

## II. How SSO Operations waiver use improved services to children



Reduced barriers to children receiving meals



Increased participation



Improved safety by not requiring congregate feeding or meal pick-up

State agencies reported that the SSO Operations waiver improved services to children in several ways, including by reducing barriers to children receiving meals (83 percent of State agencies) and increasing participation in meal service (81 percent). This waiver reduced barriers and enabled increased participation because it allowed local program operators to continue serving free meals to all children in non-summer months. Most State agencies (71 percent) also reported that use of this waiver improved safety by not requiring children to eat in congregate settings or be present for meal pick-up (Appendix [Exhibit D.6](#)). This was particularly

important during SY 2021–2022 and summer 2022, when schools were open for in-person instruction but physical distance was recommended to minimize the spread of COVID-19.<sup>13</sup>

### 2. Parent and Guardian Pick-up, Non-congregate, and Meal Time Requirements waivers

There are several program regulations set up to ensure the integrity of Child Nutrition Programs. For instance, meals may only be served directly to eligible children; meals must be served in a congregate setting and consumed by children on site; and meal service must fall within certain times, as established by the State agency. The Parent and Guardian Pick-up, Non-congregate, and Meal Time Requirements waivers provided State agencies and local program operators flexibilities with these requirements.

#### I. Parent and Guardian Pick-up, Non-congregate, and Meal Time Requirements waiver use

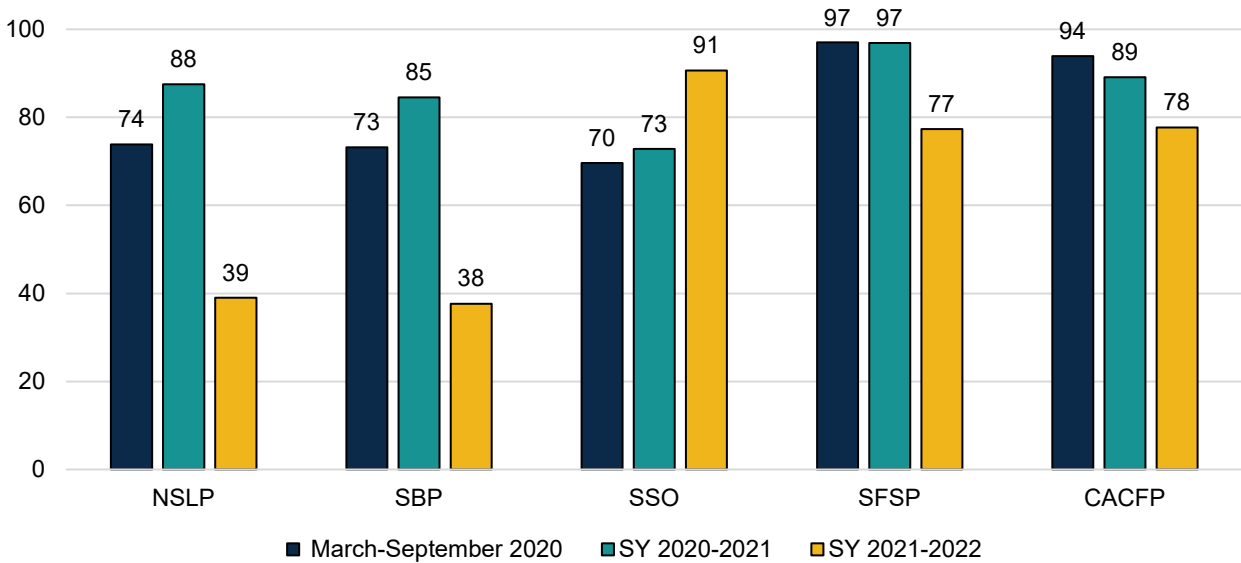
Although traditional meal service was more prevalent in SY 2021–2022 and summer 2022 than it was in the previous two years, these waivers continued to be among the most used in SY 2021–2022 or summer 2022. All 68 State agencies reported using the Parent and Guardian Pick-up and Meal Time Requirements waivers. Nearly all State agencies (67) reported using the Non-congregate waivers (Appendix [Exhibit D.1](#)).

State agencies reported that local program operators used these access-focused waivers least frequently for NSLP and SBP (about 40 percent) and most frequently for SSO (over 85 percent), which was followed by SFSP and CACFP (over 70 percent) in SY 2021–2022 and summer 2022 (Appendix [Exhibit D.2](#)). This aligns with the increase in SSO meals served in SY 2021–2022, as discussed in Chapter II. Use of the waivers was slightly different in SY 2021–2022 and summer 2022 compared to March through September 2020 and SY 2020–2021. [Exhibit III.2](#) shows how use of the waivers changed over time and by program. Fewer State agencies reported that local program operators used the waivers for NSLP, SBP, SFSP, and CACFP in SY 2021–2022 compared to March through September 2020 and SY 2020–2021. More State agencies reported that local program operators used the waivers for SSO in SY 2021–2022 compared to March through September 2020 and SY 2020–2021 (Appendix [Exhibits D.2](#) and [D.7](#)).

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<sup>13</sup> U.S. Centers for Disease Control and Prevention. “Modifying School Spaces During Mealtimes to Reduce Spread of COVID-19.” 2021. <https://www.cdc.gov/healthyschools/covid/safely-distributing-meals.html>. Accessed June 5, 2024.

**Exhibit III.2. Average percentage of State agencies reporting that local program operators used the Non-congregate, Meal Service Time Flexibility, and Parent and Guardian Pick-up waivers in March–September 2020, SY 2020–2021, and SY 2021–2022, by Child Nutrition Program**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022 and 2022–2023.

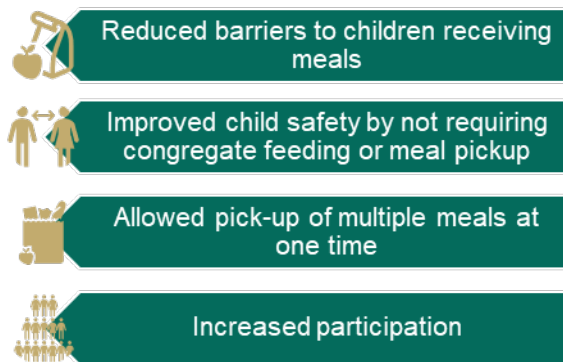
Note: Sixty-eight State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during SY 2021–2022. Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in March–September 2020 and SY 2020–2021. The waivers included here were used by local program operators.

## II. Parent and Guardian Pick-up waiver requirements

State agencies and local program operators using the Parent and Guardian Pick-up waiver were required to ensure meals were distributed only to parents or guardians of eligible children and that duplicate meals were not served. To ensure meals were distributed only to parents and guardians of eligible children, State agencies most frequently reported that the majority of their local program operators requested information on the number of children in the household and posted signage to indicate eligibility. To ensure duplicate meals were not served, State agencies most frequently reported that the majority of their local program operators told parents that children were not eligible to receive duplicate meals and requested children’s information. These findings were similar to SY 2020–2021 and March to September 2020.

*III. How use of Parent and Guardian Pick-up, Non-congregate, and Meal Time Requirements waivers improved services to children*

State agencies reported that these waivers improved services to children in several ways. Many State agencies (70 percent or more) reported that use of these waivers in SY 2021–2022 and summer 2022 reduced barriers to children receiving meals, increased participation in meal service, and improved safety by not requiring children to eat in congregate settings or be present for meal pick-up and allowing for pick-up of multiple meals at one time (Appendix [Exhibits D.6](#) and [D.8](#) to [D.11](#)). State agencies reported that these waivers improved services to children in similar ways in SY 2020–2021 and March to September 2020.



**3. Meal Pattern Flexibility waiver**

Under Federal rules, local program operators must serve meals that meet certain requirements, such as those related to meal components.<sup>14</sup> For example, lunches served through SSO must include servings of milk, grains, vegetables, fruit, and meat or meat alternates that meet certain nutritional and portion size requirements. The Meal Pattern Flexibility waiver allowed local program operators to modify the meal components served when needed. For example, local program operators using this waiver could modify the meal components served when there were food shortages or supply chain disruptions that made it difficult to get meal components needed to meet requirements, such as types of grains or milk.

*I. Meal Pattern Flexibility waiver use*

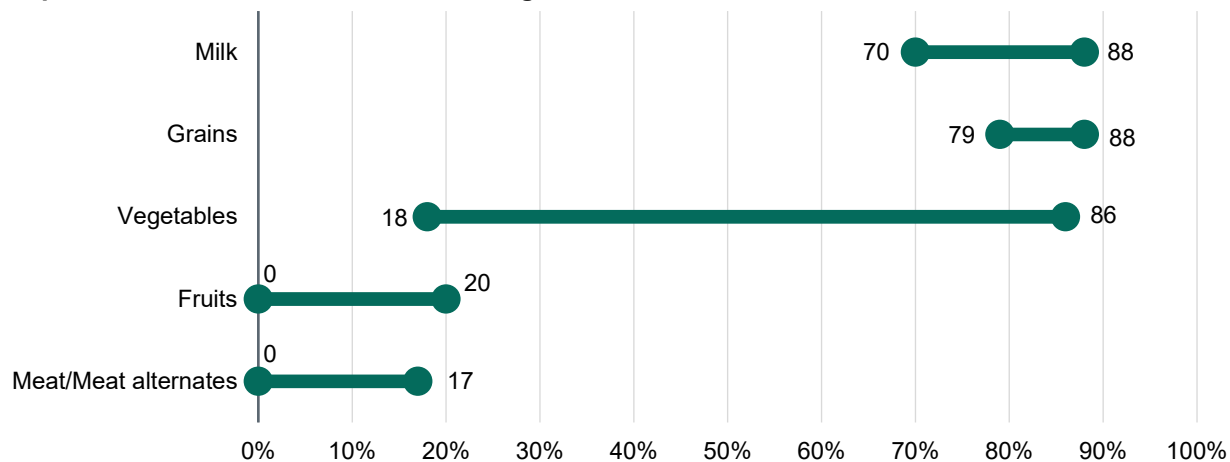
In SY 2021–2022, 93 percent of State agencies reported using the Meal Pattern Flexibility waivers. State agencies reported that local program operators used these waivers most commonly for SSO (89 percent), followed by CACFP (60 percent), NSLP (54 percent), and then SBP (52 percent) (Appendix [Exhibit D.2](#)).

As in previous years, State agencies most frequently reported that local program operators waived requirements for grains, milk, and vegetables, while fewer reported that local program operators waived requirements for fruits and meat and meat alternates, regardless of which programs the State agencies administered (Appendix [Exhibit D.12](#)). [Exhibit III.3](#) shows the percentage of State agencies reporting that local program operators used the Meal Pattern Flexibility waiver extension to waive certain meal component requirements in SY 2021–2022. The range shown for each food component reflects variation across each Child Nutrition Program. For example, only 18 percent of State agencies reported that CACFP institutions waived meal pattern requirements for vegetables, whereas at least 72 percent of State agencies reported that SFAs operating NSLP, SBP, or SSO waived meal pattern requirements for vegetables.

Many State agencies reported that most local program operators using these waivers waived food components for the full 2021–2022 school year when serving meals under NSLP (67 percent), SBP (62 percent), SSO (71 percent), and CACFP (70 percent) (Appendix [Exhibit D.13](#)).

<sup>14</sup> Food and Nutrition Service. “Final Rule: Nutrition Standards in the National School Lunch and School Breakfast Programs.” *Federal Register*, vol. 77, no. 17, January 26, 2012, pp. 4088–4167.

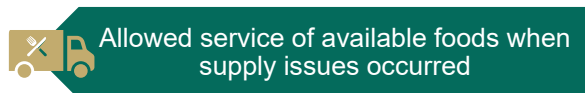
**Exhibit III.3. Extent of variation in percentage of State agencies reporting that local program operators used the Meal Pattern Flexibility waiver extension to waive certain meal component requirements in each Child Nutrition Program, SY 2021–2022**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SY 2022–2023.

Note: The Meal Pattern Flexibility waiver was used by 30 State Agencies for NSLP, 29 State Agencies for SBP, 48 State Agencies for SSO, and 33 State Agencies for CACFP. The bars indicate the extent of variation in State agency responses by Program, including NSLP, SBP, SSO, SFSP, and CACFP. Percentages were calculated by dividing the number of State agencies that reported each component or subgroup by the total number of State agencies that used the waiver in the program.

## II. How Meal Pattern Flexibility waiver use improved services to children



Allowed service of available foods when supply issues occurred

Regardless of the Child Nutrition Program administered, most State agencies reported that use of the Meal Pattern Flexibility waiver improved

services to children by allowing service of available foods when supply issues occurred (Appendix Exhibits D.6, D.8, D.9, and D.11).

### 4. Area Eligibility waivers

Area Eligibility waivers provided local program operators flexibility for establishing meal sites, which allowed many of them to serve children in need, such as those who may have been newly eligible for benefits because of the economic effects of COVID-19. Under standard Federal rules, open meal sites are allowed to operate in areas 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.<sup>15</sup> However, the area eligibility waivers provided flexibility with this rule and allowed local program operators, regardless of their location, to offer free meals and snacks to children in SY 2021–2022.

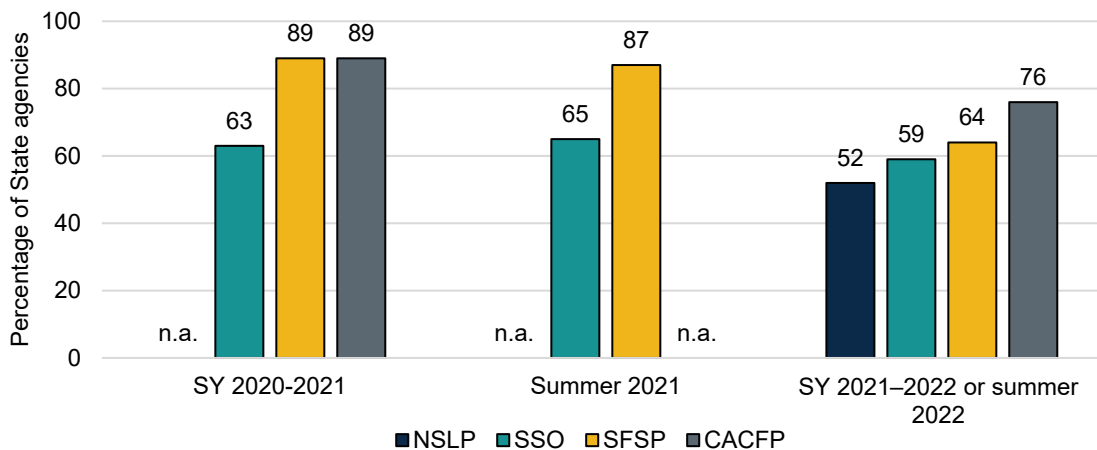
#### I. Area Eligibility waiver use

Like other access-focused waivers, the Area Eligibility waivers were widely used: 93 percent of State agencies reported using the waivers. State agencies reported that local program operators used these

<sup>15</sup> Food and Nutrition Service. “Area Eligibility in Child Nutrition Programs.” Memorandum to Regional Directors, Special Nutrition Programs, All Regions, and State Directors, Child Nutrition Programs, All States, December 1, 2016.

waivers for CACFP (76 percent), followed by SFSP (64 percent), SSO (59 percent), and then NSLP (52 percent) (Appendix [Exhibit D.2](#)). [Exhibit III.4](#) shows how use of the waivers changed over time. Fewer State agencies reported that local program operators used the waivers for SSO, SFSP and CACFP in SY 2021–2022 compared to SY 2020–2021 and summer 2021 (Appendix [Exhibits D.2, D.5, D.14, and D.15](#)).

**Exhibit III.4. Percentage of State agencies reporting that local program operators used Area Eligibility waivers in SY 2021–2022 compared to SY 2020–2021, by Child Nutrition Program**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2021–2022 and 2022–2023.

Note: Sixty-eight State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during SY 2021–2022. Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in March-September 2020 and SY 2020–2021. The waivers included here were used by local program operators.

n.a = not applicable.

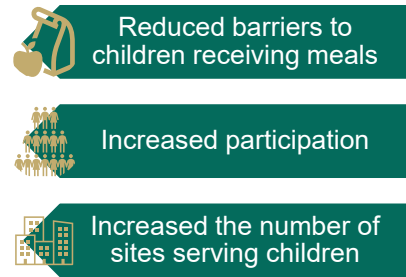
## II. How local program operators selected new area-eligible SFSP, SSO, and CACFP sites

State agencies with local program operators that established new meal sites by using these waivers were required to report on 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. State agencies most frequently reported that none of their SFAs and institutions used the methods asked about in the State agency survey to select new area-eligible meal sites (Appendix [Exhibits D.16 and D.17](#)). Also, State agencies most frequently reported that more than half of sponsors selected near-eligible sites, such as sites where 40 percent of children were eligible for free or reduced-price meals or sites that were area eligible in prior years (Appendix [Exhibit D.18](#)).



### III. How Area Eligibility waiver use improved services to children

State agencies reported that the Area Eligibility waivers improved services to children in several ways. Use of these waivers reduced barriers to children receiving meals (over 80 percent), increased participation (over 70 percent), and increased the number of sites serving children (over 60 percent) (Appendix Exhibits D.6, D.8, D.10, and D.11).



## B. Program administration waivers

In addition to the waivers that primarily focused on improving children’s access to meals, FNS issued nationwide waivers that provided State agencies and local program operators flexibilities related to program administration for SY 2020–2021 and summer 2022. Many of these waivers were extensions of waivers first authorized between March and September 2020 or SY 2020–2021. Some were newly authorized for this time period.

### 1. Onsite monitoring waivers

State agencies and local program operators continued using onsite monitoring waivers ([Box III.2](#)), which provided flexibilities with onsite monitoring requirements. Under standard program regulations, State agencies and local program operators are required to monitor Child Nutrition Program operations. Onsite monitoring is required at specified intervals to help ensure program integrity.<sup>16</sup> However, to maintain safety and minimize the spread of COVID-19, FNS issued monitoring waivers for each program from March through September 2020, which provided flexibilities with these requirements for State agencies and local program operators. FNS guidance noted that suspending onsite monitoring was vital to support social distancing while providing meals and that school, child care center, and family day care home closures may limit opportunities for onsite monitoring. As the pandemic continued, FNS extended these waivers into SYs 2020–2021 and 2021-2022.

**Box III.2. Onsite monitoring waivers**

**School Meals Onsite Monitoring.** Provided flexibilities for State agencies and SFAs in certain monitoring and review requirements for school meals programs.

**CACFP Onsite Monitoring for Sponsors.** Provided flexibilities in certain monitoring and review requirements for sponsors participating in CACFP.

**CACFP Onsite Monitoring for State Agencies.** Provided flexibilities in certain monitoring and review requirements for CACFP.

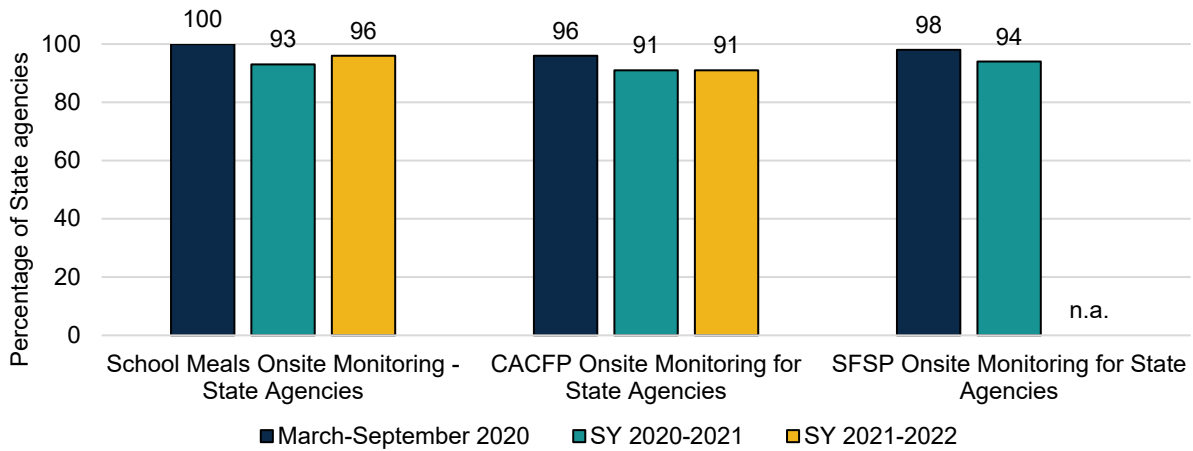
#### I. Onsite monitoring waiver use

Onsite monitoring waivers continued to be frequently used by State agencies, with nearly all State agencies overseeing school meal programs (96 percent) reporting that they used the School Meals Onsite Monitoring waiver for SY 2021–2022. There was a 3 percentage point increase in the number of State

<sup>16</sup> Food and Nutrition Service. “Oversight and Monitoring of the School Meals Programs—Information Regarding Onsite and Offsite Strategies and Options.” Memorandum to Regional Directors, Special Nutrition Programs, All Regions, and State Directors, Child Nutrition Programs, All States, April 6, 2023.

agencies that reported using them for SY 2021–2022 compared to the previous school year, 2020–2021. Almost all State agencies overseeing CACFP (91 percent) reported using the CACFP Onsite Monitoring State Agencies waiver (Appendix [Exhibits D.1, D.19, and D.20](#)). Waivers for onsite monitoring requirements were not extended for SFSP as they had been in previous years. [Exhibit III.5](#) shows how use of these waivers changed throughout the pandemic.

**Exhibit III.5. Percentage of State agencies that used each State agency monitoring waiver in March–September 2020, SY 2020–2021, and SY 2021–2022**



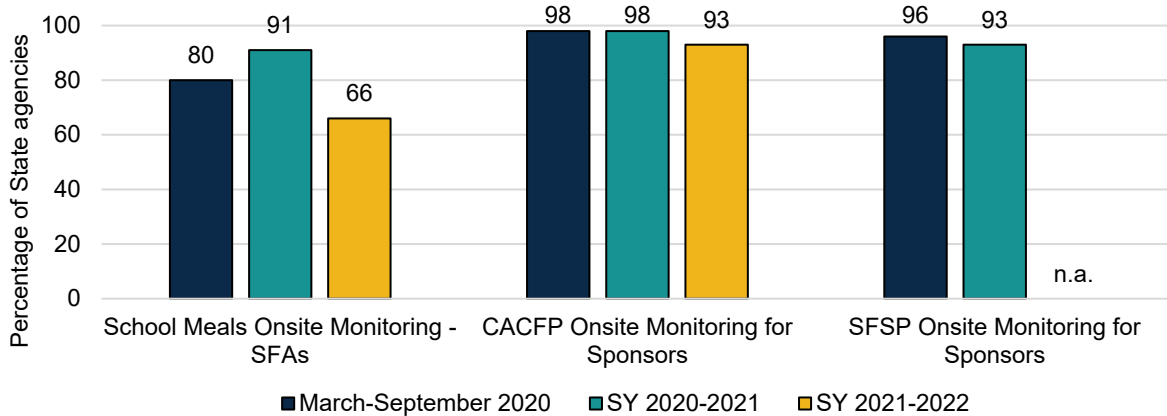
Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022, and 2022–2023.

Note: Sixty-eight State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during SY 2021–2022. Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in March–September 2020 and SY 2020–2021. Each waiver applies to specific Child Nutrition Programs, as noted in the name of the waiver.

n.a = not applicable.

According to State agencies, SFA usage of the School Meals Onsite Monitoring waiver declined in SY 2021–2022. Slightly fewer State agencies reported that CACFP institutions used the CACFP Onsite Monitoring Waiver for Sponsors in SY 2021–2022 compared to SY 2020–2021 and March to September 2020 (Appendix [Exhibits D.2, D.4, and D.21](#)). [Exhibit III.6](#) shows how State reported local program operator use of these waivers changed throughout the pandemic. As noted, onsite monitoring waivers were not issued for SFSP in SY 2021–2022.

**Exhibit III.6. Percentage of State agencies that reported local program operators used each State agency monitoring waiver in March–September 2020, SY 2020–2021, and SY 2021–2022**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022, and 2022–2023.

Note: Sixty-eight State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during SY 2021–2022. Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in March–September 2020 and SY 2020–2021. Each waiver applies to a specific Child Nutrition Programs, as noted in the name of the waiver.

n.a = not applicable.

## II. How State agencies and local program operators conducted monitoring

Under these waivers, many State agencies and local program operators shifted their approaches to monitoring from onsite visits to alternative methods, including desk audits and virtual observations. State agencies most frequently reported that they conducted desk audits to monitor sponsoring organizations, either by reviewing records and paperwork or by interviewing site operators, (between 70 percent and 78 percent of State agencies, depending upon the waiver) (Appendix [Exhibit D.22](#)). This was similar to the types of monitoring they reported conducting in the early months of the pandemic and in SY 2020–2021 (Appendix [Exhibits D.23](#) and [D.24](#)).

State agencies most commonly reported that their local program operators also conducted desk audits. Across all programs, State agencies reported that their local program operators conducted desk audits by reviewing paperwork (57 percent) or interviewing site operators (60 percent) (Appendix [Exhibit D.25](#)). Desk audits were also the most commonly used monitoring approach across all programs in the early months of the pandemic and in SY 2020–2021 (Appendix [Exhibits D.26](#) and [D.27](#)).<sup>17</sup> Fewer State agencies reported that local program operators conducted virtual monitoring. For CACFP, many State agencies reported that local program operators conducted onsite but socially distanced observations.

<sup>17</sup> The percentages shown are the percent of State agencies that reported “about half”, “more than half” or “all” local program operators used the method.

### III. How onsite monitoring waiver use improved services to children

Onsite monitoring waivers enabled State agencies and local program operators to implement safer alternate methods of monitoring instead of conducting monitoring in person. Most State agencies reported that the flexibility provided by the onsite monitoring waivers improved services to children in SY 2021–2022 by allowing State agencies and local program operators to focus administrative resources on other priority areas, such as providing meals to children. They also increased the ability of State agencies to provide technical assistance (TA) to local program operators (Appendix [Exhibits D.28](#) to [D.31](#)).



Increased ability to focus administrative resources on other priority areas



Increased ability to provide technical assistance to local program operators

## 2. Child Nutrition Program Reporting Requirements waiver

The pandemic introduced challenges and limitations that impacted the ability of State agencies and local program operators to submit accurate and complete reporting during SY 2020–2021, which continued through SY 2021–2022. In response, FNS waived select reporting requirements in the Child Nutrition Programs<sup>18</sup> to enable States to reallocate their limited staffing resources to meal service and relevant COVID-19 response activities rather than expending those resources on the completion of administrative reporting.

### I. Child Nutrition Program Reporting Requirements waiver use

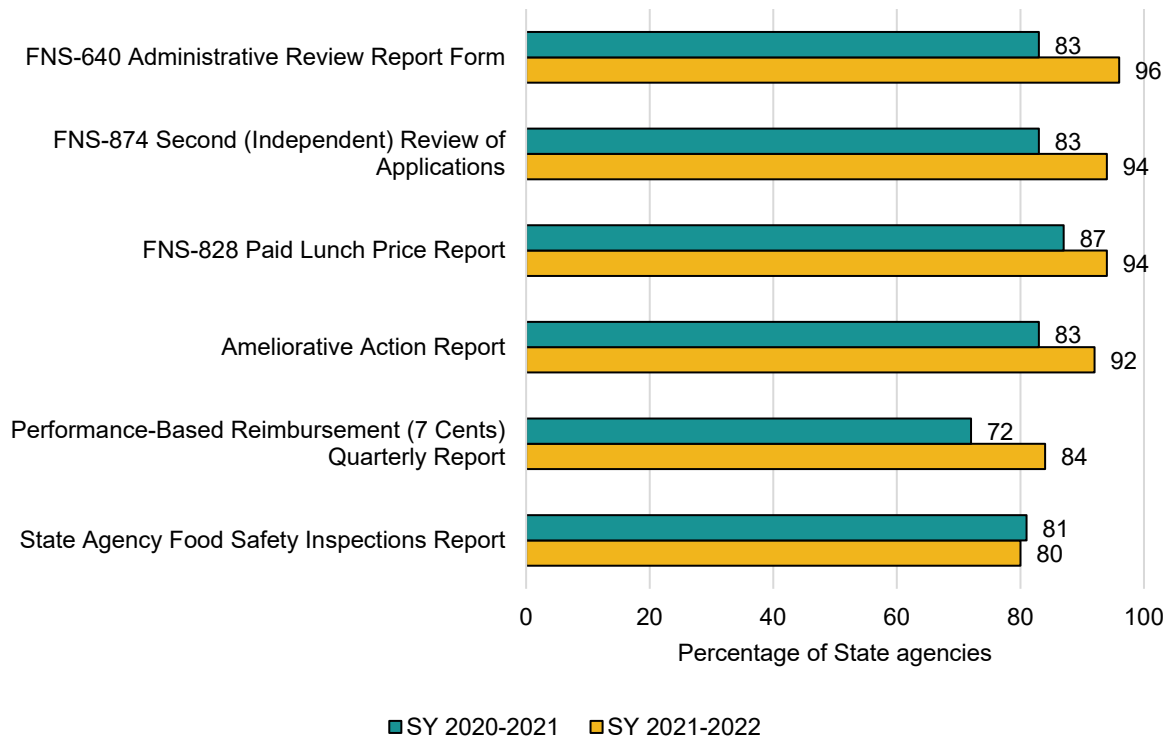
Similar to SY 2020–2021, nearly all State agencies (91 percent) used the Child Nutrition Programs Reporting Requirements waiver, and most (86 percent) used it for all SFAs in their State (Appendix [Exhibits D.1](#), [D.32](#), and [D.33](#)) in SY 2021–2022. State agencies that did not use the waiver for all SFAs most commonly reported that all SFAs were still required to complete their reporting requirements (Appendix [Exhibit D.34](#)).

State agencies most frequently reported using the waiver for the FNS-640 Administrative Review Report Form and the FNS-874 Second (Independent) Review of Applications (over 93 percent of State agencies) in SY 2021–2022 (Appendix [Exhibit D.35](#)). This was a slight increase compared to the percentage of State agencies that reported waiving certain reporting requirements in SY 2020–2021 (Appendix [Exhibit D.36](#)). [Exhibit III.7](#) shows which reports State agencies waived in SY 2021–2022 compared to SY 2020–2021.

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<sup>18</sup> This waiver canceled several reporting requirements: FNS-640 Administrative Review Report Form, FNS-828 SFA Paid Lunch Price Report, FNS-874 Second (Independent) Review of Applications, Ameliorative Action Report, State Agency Food Safety Inspections Report, and Performance-Based Reimbursement (7 Cents) Quarterly Report.


**Exhibit III.7. Percentage of State agencies that used the Child Nutrition Programs Reporting Requirements waiver for each applicable report**




Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2021-2022 and 2022-2023.

Note: Fifty-four State agencies used the waiver in SY 2020-2021, and 51 used it in SY 2021-2022. Percentages were calculated by dividing the number of State agencies that used the waiver for each report by the total number of State agencies that used the waiver.

*II. How Child Nutrition Program Reporting Requirements waiver use improved services to children*

- 

Increased ability to provide technical assistance to local program operators
- 

Increased ability to focus administrative resources on other priority areas

Most State agencies reported that the Child Nutrition Programs Reporting Requirements waiver increased their ability to provide technical assistance to local program operators and increased the availability of State and local resources for other priority areas (Appendix [Exhibit D.28](#)).

**3. SFSP Reimbursement for SSO waivers**

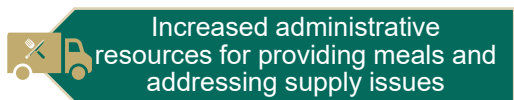
FNS also issued some new waivers for use in SY 2021-2022. As noted in Chapter II, the SFSP Reimbursement for SSO waiver was initially authorized for use beginning in July 2021 and extended through September 2022. These waivers allowed SFAs to claim SSO meals and snacks at the higher SFSP reimbursement rates.

*I. SFSP Reimbursement for SSO waivers use*

These waivers were among the most used, with nearly all State agencies (98 percent) using it in SY 2021–2022 (Appendix [Exhibit D.2](#)). Additionally, State agencies reported that over 16,000 SFAs (95 percent) used the waivers (Appendix [Exhibit D.3](#)).

*II. How SFSP Reimbursement for SSO waivers improved services to children*

All State agencies that used the waiver reported that it increased financial resources for providing meals.



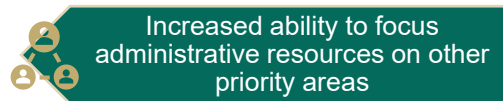
Most State agencies also reported that it increased administrative resources for providing meals and addressing food supply issues and other challenges in preparing meals (Appendix [Exhibit D.37](#)).

**4. Fiscal Action Flexibility for Meal Pattern Violations waiver**

Since the onset of the pandemic, a majority of SFAs have faced supply chain–related challenges, including limited product availability, incomplete orders, and shipment delays or cancellations, which have impacted their ability to comply with meal pattern requirements.<sup>19</sup> Under standard program regulations, State agencies are required to take fiscal action against SFAs for missing meal components or production records and for repeat violations involving milk type and vegetable subgroups. However, in response to the widespread supply chain related challenges that SFAs have faced, FNS first issued the Fiscal Action Flexibility for Meal Pattern Violations waiver for use in SY 2021–2022, which provided State agencies with flexibilities for certain fiscal action requirements for the school meals programs.

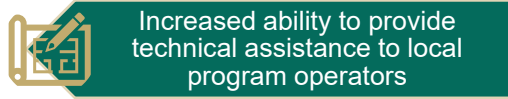
*I. Fiscal Action Flexibility for Meal Pattern Violations waiver use*

Nearly all State agencies (93 percent) used the waiver, primarily for waiving fiscal action requirements for missing food components (73 percent of State agencies) and repeated violations involving vegetable subgroups (58 percent of State agencies) (Appendix [Exhibits D.1](#) and [D.38](#)). Most State agencies (88 percent) waived fiscal action requirements for all affected SFAs (Appendix [Exhibit D.39](#)).



*II. How Fiscal Action Flexibility for Meal Pattern Violations waiver improved services to children*

State agencies reported that the waiver improved services to children by increasing local program operators’ financial resources for providing meals to children and increasing State agencies’ ability to provide TA to local program operators (Appendix [Exhibit D.28](#)).



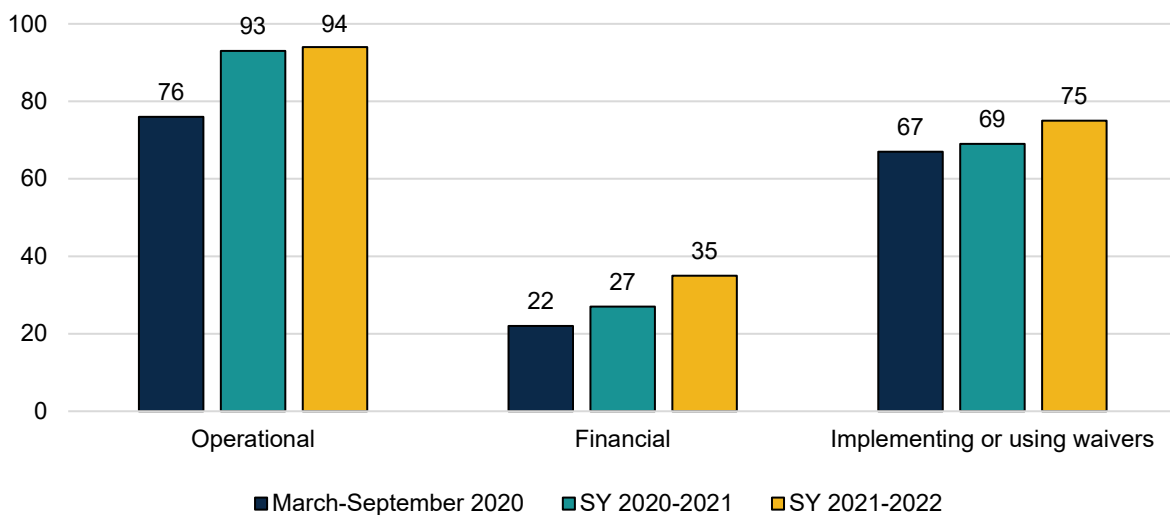
<sup>19</sup> Applebaum, M., and H. Figueroa. “Results of the U.S. Department of Agriculture, Food and Nutrition Service-Administered School Food Authority Survey on Supply Chain Disruptions.” U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, 2022. USDA Child Nutrition Program and Supplemental Nutrition and Safety: <https://www.fns.usda.gov/cn/results-fns-administered-school-food-authority-survey-supply-chain-disruption>.

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## IV. Challenges Administering Child Nutrition Programs

State agencies continued experiencing challenges administering the Child Nutrition Programs in SY 2021-2022. [Exhibit IV.1](#) shows the percentage of State agencies that reported experiencing challenges administering Child Nutrition Programs during March–September 2020, SY 2020–2021, and SY 2021–2022. Most State agencies experienced operational challenges and challenges implementing or using waivers while fewer experienced financial challenges. However, many State agencies were able to overcome challenges they experienced.

**Exhibit IV.1. Percentage of State agencies that reported experiencing challenges administering Child Nutrition Programs during March–September 2020, SY 2020–2021, and SY 2021–2022**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022, and 2022–2023.

Note: Sixty-eight State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during SY 2021–2022. Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in March–September 2020 and SY 2020–2021. Each waiver applies to a specific Child Nutrition Programs, as noted in the name of the waiver.

### A. State agency operational challenges

Ninety-four percent of State agencies reported experiencing operational challenges in SY 2021–2022 and summer 2022, which is similar to the 93 percent in SY 2020–2021 and an increase from the 76 percent in March through September 2020 (Appendix [Exhibits E.1 to E.3](#)). [Exhibit IV.2](#) shows the factors State agencies most frequently reported as contributing to their operational challenges in administering the Child Nutrition Programs during March–September 2020, SY 2020–2021, and SY 2021–2022. The factors that State agencies reported most frequently across the years included untimely and unclear guidance from FNS. Implementing information technology (IT) system changes and resources needed to provide TA to local program operators became more prominent factors in more recent years (Appendix [Exhibits E.4 to E.6](#)).



**Exhibit IV.2. Most common factors that contributed to operational challenges in administering Child Nutrition Programs during March–September 2020, SY 2020–2021, and SY 2021–2022**

March-September 2020	SY 2020-2021	SY 2021-2022
<ul style="list-style-type: none"> <li>•Untimely FNS guidance</li> <li>•Unclear FNS guidance</li> <li>•Redesigning monitoring approaches</li> </ul>	<ul style="list-style-type: none"> <li>•Untimely FNS guidance</li> <li>•Unclear FNS guidance</li> <li>•Redesigning monitoring approaches</li> <li>•Implementing Information Technology system changes</li> </ul>	<ul style="list-style-type: none"> <li>•Untimely FNS guidance</li> <li>•Unclear FNS guidance</li> <li>•Implementing Information Technology system changes</li> <li>•Resources needed to provide technical assistance to local program operators</li> </ul>

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022, and 2022–2023.

**B. State agency financial challenges**

Thirty-five percent of State agencies reported experiencing financial challenges in SY 2021–2022, an increase from 27 percent in SY 2020–2021 (Appendix [Exhibits E.1 to E.3](#)). [Exhibit IV.3](#) shows the factors State agencies most frequently reported as contributing to their financial challenges in administering the Child Nutrition Programs during March–September 2020, SY 2020–2021, and SY 2021–2022. The factors that most frequently contributed to financial challenges across all three time periods included changes to information technology systems and increases in staff hours (Appendix [Exhibits E.7 to E.9](#)). In SY 2020–2021 and SY 2021–2022 insufficient State administrative expense funds or State administrative funds were also factors that contributed to financial challenges (Appendix [Exhibits E.8 and E.9](#)). This response option was not included in the March–September 2020 State agency survey.

**Exhibit IV.3. Most common factors that contributed to financial challenges in administering Child Nutrition Programs during March–September 2020, SY 2020–2021, and SY 2021–2022**

March-September 2020	SY 2020-2021	SY 2021-2022
<ul style="list-style-type: none"> <li>•Increased staff hours</li> <li>•Information Technology systems changes</li> <li>•Staff overtime</li> </ul>	<ul style="list-style-type: none"> <li>•Information Technology systems changes</li> <li>•Increased staff hours</li> <li>•Rules regarding use of State administrative expense funds or State administrative funds</li> </ul>	<ul style="list-style-type: none"> <li>•Information Technology systems changes</li> <li>•Increased staff hours</li> <li>•Insufficient State administrative expense funds or State administrative funds</li> </ul>

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022, and 2022–2023.

### C. State agency challenges implementing and using waivers

Seventy-five percent of State agencies reported that implementing or using waivers was a challenge during SY 2021–2022, an increase from 69 percent in SY 2020–2021 and 67 percent in March through September 2020 (Appendix [Exhibits E.1](#) to [E.3](#)). [Exhibit IV.4](#) shows the challenges that State agencies most frequently reported being unable to overcome with implementing using the waivers. This included delayed or slow guidance from FNS and staff burden (Appendix [Exhibits E.10](#) to [E.12](#)).

**Exhibit IV.4. Most common challenges that State agencies were unable to overcome with implementing or using COVID-19 Child Nutrition waivers during March–September 2020, SY 2020–2021, and SY 2021–2022**

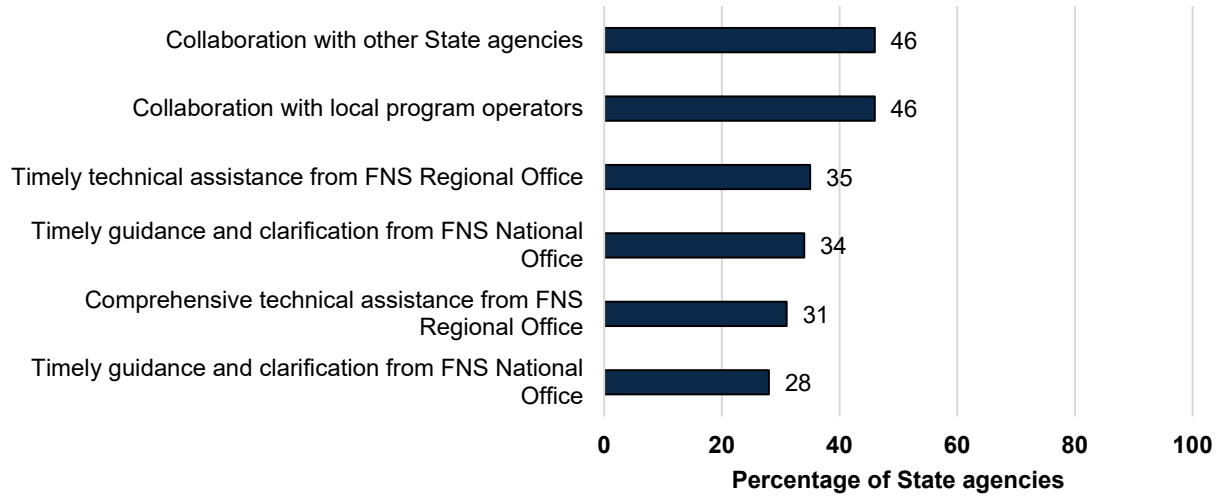
March-Sept 2020	SY 2020-2021	SY 2021-2022
<ul style="list-style-type: none"> <li>• Slow guidance from FNS</li> <li>• Time needed to collect data</li> <li>• Staff burden</li> </ul>	<ul style="list-style-type: none"> <li>• Slow guidance from FNS</li> <li>• Time needed to collect data</li> <li>• Staff burden</li> </ul>	<ul style="list-style-type: none"> <li>• Slow guidance from FNS</li> <li>• Slow waiver release by FNS</li> <li>• Unclear FNS guidance</li> <li>• Staff burden</li> </ul>

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021, 2021–2022, and 2022–2023.

### D. Overcoming challenges implementing or using COVID-19 Child Nutrition nationwide waivers

Among State agencies that experienced challenges with implementing or using the COVID-19 Child Nutrition nationwide waivers during SY 2021–2022, many were able to overcome the challenges. [Exhibit IV.5](#) shows the percentage of State agencies reporting that certain factors helped overcome these challenges. Collaboration with local program operators and collaboration with other State agencies were the factors State agencies most frequently reported as helping them overcome waiver challenges (Appendix [Exhibit E.13](#)). Forty-six percent of State agencies reported that these types of collaboration were helpful. State agencies also found guidance and TA from FNS Regional and National Offices to be helpful. Thirty-five percent of State agencies reported that timely TA from their FNS Regional Office helped them overcome waiver challenges, and 31 percent reported that comprehensive TA from their Regional Office was helpful. Thirty-four percent of State agencies reported that comprehensive guidance and clarification from the FNS National Office helped them overcome waiver challenges, and 28 percent reported that timely guidance and clarification from the FNS National Office was helpful.

**Exhibit IV.5. Percentage of State agencies reporting that certain factors assisted efforts to overcome challenges implementing or using COVID-19 Child Nutrition Nationwide waivers during SY 2021–2022**



Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SY 2022–2023.

Note: Percentages were calculated by dividing the number of SAs that reported each factor by 68 total State agency respondents.

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## V. Next in the Study Series

The fourth report in this series will discuss findings from SY 2022–2023 and summer 2023. As described in Chapter I, the Keep Kids Fed Act extended certain flexibilities and provided other supports through September 2022 to assist State agencies and local program operators as they transitioned to operating the Child Nutrition Programs without most of the waivers that had been in place for the previous three years. The fourth report will provide a summary of program participation, child participation, meals served, and Child Nutrition Program operations directly following the expiration of the COVID-19 Child Nutrition nationwide waivers.

As in previous years of the study, data collection for SY 2022–2023 and summer 2023 involved obtaining survey and administrative data from the 68 State agencies in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands that administer NSLP, SBP, SSO, SFSP, and CACFP as well as survey data from a sample of SFAs.

The State Agency Child Nutrition Director Survey was fielded to State agencies that oversee NSLP, SBP, or SSO. The State agency survey captured information on Child Nutrition Program operations in SY 2022–2023 and congressionally mandated data on use of the COVID-19 Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2022–2023. This waiver applied to the NSLP, SBP, and SSO. The State agency survey gathered information to satisfy the statutory reporting requirements for the SY 2022–2023 Fiscal Action waiver.

The SFA survey gathered information from a sample of SFAs on Child Nutrition Program operations and finances during SY 2022–2023. The topics covered in the survey included school participation, State-provided universal free school meals, eligibility determination and verification, meal prices, funding and expenditures, procurement, and meal preparation and service.

The administrative data provides information about program participation, child participation, and meals served in the Child Nutrition Programs during SY 2022–2023 and summer 2023.

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## **Appendix A**

### **COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

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**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

The FFCRA provided FNS with the authority to establish nationwide waivers of certain Child Nutrition Program rules, which provided States and local program operators with flexibilities to help them continue serving meals to children during the COVID-19 pandemic. [Exhibit A.1](#) lists the waivers authorized for use during the study period of SY 2021–2022 and summer 2022. Waivers are arranged by initial authorization date. [Exhibit A.2](#) lists waivers previously authorized for use that FNS did not extend into the study period.

**Exhibit A.1. COVID-19 Child Nutrition nationwide waivers and waiver extensions authorized for use during SY 2020–2021 or summer 2021**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
Non-congregate	<a href="#">COVID-19: Child Nutrition Response #33: Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs (SBP, NSLP, and CACFP)—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #44: Nationwide Waiver to Allow Non-congregate Feeding in the SFSP—Extension 3</a> <a href="#">COVID-19: Child Nutrition Response #54: Nationwide Waiver to Allow Non-congregate Feeding in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option—Extension 4</a> <a href="#">COVID-19: Child Nutrition Response #61: Nationwide Waivers to Allow Non-congregate Feeding in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option—Extension 5</a> <a href="#">COVID-19: Child Nutrition Response #75: Nationwide Waiver to Allow Non-congregate Feeding for Summer 2021 Operations—Extension 6</a> <a href="#">COVID-19: Child Nutrition Response #87: Nationwide Waiver to Allow Non-congregate Meal Service</a> <a href="#">COVID-19: Child Nutrition Response #101: Nationwide Waiver to Allow Non-congregate Meal Service for Service Institutions Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021–2022</a>	March 20, 2020	September 30, 2022	Access	NSLP, SBP, SSO, SFSP, CACFP	Allowed meals to be served and consumed in non-group settings

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
	<a href="#">COVID-19: Child Nutrition Response #111: Nationwide Waiver to Allow Non-congregate Feeding for Summer 2022 Operations—Extension 7</a>					
Meal Service Time Flexibility	<a href="#">COVID-19: Child Nutrition Response #34: Nationwide Waiver to Allow Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #50: Nationwide Waiver of Meal Service Time Restrictions in the SFSP and SSO—Extension</a> <a href="#">COVID-19: Child Nutrition Response #66: Nationwide Waiver of Meal Service Time Restrictions in the SFSP and SSO—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #78: Nationwide Waiver of Meal Service Time Restrictions for Summer 2021 Operations—Extension 3</a> <a href="#">COVID-19: Child Nutrition Response #88: Nationwide Waiver of Meal Times Requirements</a> <a href="#">COVID-19: Child Nutrition Response #102: Nationwide Waiver of Meal Times Requirements for Service Institutions Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022</a> <a href="#">COVID-19: Child Nutrition Response #113: Nationwide Waiver of Meal Service Time Restrictions for Summer 2022 Operations—Extension 4</a>	March 20, 2020	September 30, 2022	Access	NSLP, SBP, SSO, SFSP, CACFP	Allowed meals to be served to children outside traditional times to maximize flexibility for meal pick-up
Parent and Guardian Pick-up	<a href="#">COVID-19: Child Nutrition Response #35: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children (SBP, NSLP, and CACFP)—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #47: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children—Extension 3</a>	March 25, 2020	September 30, 2022	Access	NSLP, SBP, SSO, SFSP, CACFP	Allowed parents and guardians to pick up meals and bring them home to their children

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
	<a href="#">COVID-19: Child Nutrition Response #55: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children (SSO and SFSP)— Extension 4</a> <a href="#">COVID-19: Child Nutrition Response #62: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children (SSO and SFSP)—Extension 5</a> <a href="#">COVID-19: Child Nutrition Response #76: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children for Summer 2021 Operations—Extension 6</a> <a href="#">COVID-19: Child Nutrition Response #89: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children</a> <a href="#">COVID-19: Child Nutrition Response #103: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals Served by Service Institutions through the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022</a> <a href="#">COVID-19: Child Nutrition Response #112: Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children for Summer 2022 Operations</a>					
Meal Pattern Flexibility	<a href="#">COVID-19: Child Nutrition Response #36: Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs – Extension 4</a> <a href="#">COVID-19: Child Nutrition Response #38: Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs – Extension 5</a> <a href="#">COVID-19: Child Nutrition Response #45: Nationwide Waiver to Allow Meal Pattern Flexibility in SFSP – Extension 6</a> <a href="#">COVID-19: Child Nutrition Response #53: Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option- Extension 7</a>	March 25, 2020	June 30, 2022	Access	NSLP, SBP, SSO, SFSP, CACFP	Provided the flexibility to serve meals that do not meet specified meal pattern requirements when needed

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
	<a href="#">COVID-19: Child Nutrition Response #63: Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option- Extension 8</a> <a href="#">COVID-19: Child Nutrition Response #70: Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs (NSLP, SBP, and CACFP)- Extension 5</a> <a href="#">COVID-19: Child Nutrition Response #74: Nationwide Waiver to Allow Meal Pattern Flexibilities for Summer 2021 Operations- Extension 9</a> <a href="#">COVID-19: Child Nutrition Response #90: Nationwide Waiver to Allow Specific School Meal Pattern Flexibility</a> <a href="#">COVID-19: Child Nutrition Response #91: Nationwide Waiver to Allow Specific Meal Pattern Flexibility in the Child and Adult Care Food Program</a>					
High School Offer vs. Serve	<a href="#">COVID-19: Child Nutrition Response #37: Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High School in the National School Lunch Program for SY 2020–2021</a> <a href="#">COVID-19: Child Nutrition Response #92: Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools</a>	June 25, 2020	June 30, 2022	Access	NSLP, SSO	Provided the flexibility to serve meals without using offer versus serve in senior high schools
CACFP Monitoring for Sponsors	<a href="#">COVID-19: Child Nutrition Response #39: Nationwide Waiver of Monitoring Requirements for Sponsors in the Child and Adult Care Food Program—Extension</a> <a href="#">COVID-19: Child Nutrition Response #96: Nationwide Waiver of Onsite Monitoring Requirements for Sponsors in the Child and Adult Care Food Program – Extension</a>	March 27, 2020	June 10, 2023 <sup>c</sup>	Administrative - sponsors	CACFP	Provided flexibilities in certain monitoring and review requirements for sponsors participating in CACFP
CACFP Onsite Monitoring for State agencies	<a href="#">COVID-19: Child Nutrition Response #40: Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Child and Adult Care Food Program—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #95: Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Child and Adult Care Food Program – Extension 3</a>	March 27, 2020	June 10, 2023	Administrative – State agencies	CACFP	Provided flexibilities in certain monitoring and review requirements for CACFP

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
School Meals Onsite Monitoring—Revised	<a href="#">COVID-19: Child Nutrition Response #41: Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #94: Nationwide Waiver of Onsite Monitoring Requirements in the School Meal Programs – Revised – Extension 3</a>	March 27, 2020	June 10, 2023	Administrative – State agencies and SFAs	NSLP, SBP, SSO	Provided flexibilities in certain monitoring and review requirements for school meals programs
SFSP Onsite Monitoring for State Agencies	<a href="#">COVID-19: Child Nutrition Response #43: Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Summer Food Service Program—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #99: Nationwide Waiver of the Annual Half Aggregate Monitoring Requirement in the Summer Food Service Program</a>	March 27, 2020	September 30, 2022	Administrative – State agencies	SFSP	Provided flexibilities in certain monitoring requirements for State agencies administering and sponsors operating SFSP
Area Eligibility	<a href="#">COVID-19: Child Nutrition Response #46: Nationwide Waiver to Extend Area Eligibility Waivers—Extension</a> <a href="#">COVID-19: Child Nutrition Response #52: Nationwide Waiver to Extend Area Eligibility Waivers—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #60: Nationwide Waiver to Extend Area Eligibility Waivers—Extension 3</a> <a href="#">COVID-19: Child Nutrition Response #77: Nationwide Waiver to Extend Area Eligibility Waivers for Summer 2021 Operations—Extension 4</a> <a href="#">COVID-19: Child Nutrition Response #93: Nationwide Waiver of Area Eligibility in the Afterschool Programs and for Family Day Care Home Providers</a> <a href="#">COVID-19: Child Nutrition Response #104: Nationwide Waiver of Area Eligibility Requirements for Service Institutions Operating the Summer Food Service Program during Unanticipated School Closures in School Year 2021-2022</a> <a href="#">COVID-19: Child Nutrition Response #107: Nationwide Waiver to Extend Area Eligibility Waivers for Summer 2022 Operations</a>	June 10, 2020	September 30, 2022	Access	NSLP, SSO, SFSP, CACFP	Allowed sponsors regardless of their location to operate open SSO and SFSP sites

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
Closed Enrolled Area Eligibility	<a href="#">COVID-19: Child Nutrition Response #48: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in SFSP and the NSLP Seamless Summer Option—Extension</a> <a href="#">COVID-19: Child Nutrition Response #64: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in SFSP and the NSLP Seamless Summer Option—Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #80: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites for Summer 2021 Operations—Extension 3</a> <a href="#">COVID-19: Child Nutrition Response #108: Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites for Summer 2022 Operations – Extension 4.</a>	April 21, 2020	September 30, 2022	Administrative – SFAs and sponsors	SFSP, SSO	Allowed sponsors to determine closed enrolled SSO and SFSP site eligibility through area eligibility
SSO and SFSP Operations	<a href="#">COVID-19: Child Nutrition Response #56: Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations Through December 2020</a> <a href="#">COVID-19: Child Nutrition Response #59: Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations Through School Year 2020-2021—Extension</a> <a href="#">COVID-19: Child Nutrition Response #85: Nationwide Waiver to Allow the Seamless Summer Option</a>	October 9, 2020	June 30, 2022	Access	SSO, SFSP	Allowed local program operators to continue operating SSO and SFSP during non-summer months
SFSP Pre-Approval Visits and Reimbursements	<a href="#">COVID-19: Child Nutrition Response #57: Nationwide Waiver to Allow Reimbursement for Meals Served Prior to Notification of Approval and Provide Flexibility for Pre-Approval Visits in the Summer Food Service Program</a> <a href="#">COVID-19: Child Nutrition Response #69: Nationwide Waiver to Allow Reimbursement for Meals Served Prior to Notification of Approval and Provide Flexibility for Pre-Approval Visits in the Summer Food Service Program—Extension</a>	September 11, 2020	June 30, 2022	Administrative – sponsors	SFSP	Allowed sponsors to be reimbursed for meals prior to receiving approval to participate in SFSP
FSMC Contract Duration	<a href="#">COVID-19: Child Nutrition Response #71: Nationwide Waiver of Food Service Management Contract Duration in the National School Lunch Program and Summer Food Service Program</a>	April 24, 2020	June 30, 2022	Administrative – SFAs and sponsors	NSLP, SFSP	Allowed extension of FSMC contracts

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
Reporting Requirements	<a href="#">COVID-19: Child Nutrition Response #72: Nationwide Waiver for Selected Child Nutrition Programs Reporting Requirements</a> <a href="#">COVID-19: Child Nutrition Response #106: Nationwide Waiver for Selected Child Nutrition Program Reporting Requirements</a>	January 7, 2021	End of SY 2021–2022	Administrative – State agencies	NSLP, SBP	Cancelled selected administrative data reporting requirements in the Child Nutrition Programs
SFSP Reimbursement for SSO	<a href="#">COVID-19: Child Nutrition Response #86: Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates</a> <a href="#">COVID-19: Child Nutrition Response #109: Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates for the Seamless Summer Option in Summer 2022</a>	July 1, 2021	September 30, 2022	Administrative – SFAs	SSO	Allowed SFAs to claim NSLP SSO meals and snacks at the SFSP reimbursement rates.
Administrative Reviews for SSO Operators	<a href="#">COVID-19: Child Nutrition Response #97: Nationwide Waiver to Provide Flexibility for School Meal Programs Administrative Reviews of SFAs Operating Only the SSO in SY 2021-22</a>	May 21, 2021	End of SY 2021–2022	Administrative – SFAs	SSO	Provided flexibilities for State agencies conducting administrative reviews of school food authorities operating only the SSO.
School Wellness Policy Assessments	<a href="#">COVID-19: Child Nutrition Response #98: Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the National School Lunch and School Breakfast Programs</a>	June 11, 2021	June 30, 2022	Administrative – SFAs	NSLP, SBP	Provided a new first triennial assessment deadline of June 30, 2022.
Fiscal Action Flexibility for Meal Pattern Violations	<a href="#">COVID-19: Child Nutrition Response #100: Waiver to Allow Fiscal Action Flexibility for Meal Pattern Violations Related to COVID-19 Supply Chain Disruptions Impacting School Meals in School Year 2021-2022</a>	September 15, 2021	June 30, 2022	Administrative – SFAs	NSLP, SBP	Provided flexibilities for requirements to take fiscal action for meal pattern violations for school meals programs.
SSO and SFSP Meal Service at School Sites	<a href="#">COVID-19: Child Nutrition Response #105: Nationwide Waiver to Allow Service of Meals at School Sites during Unanticipated School Closures in School Year 2021-2022</a>	October 1, 2021	April 30, 2022	Access	SFSP, SSO	Allowed SSO and SFSP meals to be served at school sites during unanticipated school closures.

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Expiration date <sup>b</sup>	Focus	Programs	Description of waiver
SFSP Application Deadlines and Reimbursements	<a href="#">COVID-19: Child Nutrition Response #114: Nationwide Waiver of the Summer Sponsor Application Deadline and to Allow Reimbursement for Meals Served Prior to Notification of Approval for Summer 2022 Operations</a>	July 8, 2022	September 30, 2022	Administrative – SFAs	SFSP, SSO	Allowed State agencies to waive the June 15 application deadline for SFSP sponsors and to reimburse sponsors for meals served back to the date a complete and correct application was received through September 30, 2022.

Source: Child Nutrition COVID-19 Waivers (<https://www.fns.usda.gov/fns-disaster-assistance/fns-responds-covid-19/child-nutrition-covid-19-waivers>).

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

<sup>a</sup> Initial authorization date reflects the date the first waiver of this type was authorized for use.

<sup>b</sup> Expiration date reflects the expiration date of the final waiver extension.

<sup>c</sup> Expiration date reflects 30 days after the end of the public health emergency.



**Exhibit A.2. COVID-19 Child Nutrition nationwide waivers authorized for use from March through September 2020 or SY 2020–2021 and not extended through SY 2021–2022**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Focus	Description of waiver
Afterschool Activity Requirements in NSLP/CACFP	<a href="#">COVID-19: Child Nutrition Response #3: Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs</a>	March 20, 2020	Access	Allowed after-school meals and snacks to be served outside the standard after-school setting
60-Day Reporting Requirements	<a href="#">COVID-19: Child Nutrition Response #12: Nationwide Waiver of 60 Day Reporting Requirements for January and February 2020</a>	April 1, 2020	Administrative	Provided new deadline for 60-day reporting requirements
School Wellness Policy Assessments	<a href="#">COVID-19: Child Nutrition Response #18: Nationwide Waiver of Local School Wellness Policy Triennial Assessments in the NSLP and SBP</a>	April 23, 2020	Administrative	Provided a new first triennial assessment deadline
CACFP Annual Review Requirements for State agencies	<a href="#">COVID-19: Child Nutrition Response #20: Nationwide Waiver of Annual Review Requirements for State Agencies in the Child and Adult Care Food Program</a>	April 24, 2020	State administrative	Provided flexibility for conducting annual reviews of CACFP sites
SFSP/SSO Unanticipated School Closure Operations	<a href="#">COVID-19: Child Nutrition Response #21: Nationwide Waiver to Extend Unanticipated School Closure Operations</a>	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 Onsite Monitoring for Sponsors	<a href="#">COVID-19: Child Nutrition Response #42: Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program— Extension 2</a>	March 27, 2020	Administrative – sponsors	Provided flexibilities in certain monitoring and review requirements for sponsors participating in SFSP
Community Eligibility Provision Data Waiver	<a href="#">COVID-19: Child Nutrition Response #82: Nationwide Waiver of Community Eligibility Provision Deadlines in the National School Lunch and School Breakfast Programs</a>	March 26, 2021	Administrative – SFAs	Provided more time to meet required election and reporting deadlines for CEP
Experienced SFSP Sponsors	<a href="#">COVID-19: Child Nutrition Response #83: Nationwide Waiver to Allow Sponsors that Successfully Participated in the Summer Food Service Program (SFSP) in Fiscal Year 2019 to Operate as Experienced Sponsors in Fiscal Year 2021</a>	April 1, 2021	Administrative – State agencies	Allowed State agencies to use a streamlined application and approval process for returning sponsors that successfully participated in SFSP in FY 2019 but not in FY 2020

**Appendix A. COVID-19 Child Nutrition Nationwide Waivers and Waiver Extensions**

Waiver name	Full waiver policy memo name	Initial authorization date <sup>a</sup>	Focus	Description of waiver
CACFP At-Risk Afterschool Area Eligibility	<a href="#">COVID-19: Child Nutrition Response #58: At-Risk Afterschool Area Eligibility Waiver</a> <a href="#">COVID-19: Child Nutrition Response #68: At-Risk Afterschool Area Eligibility Waiver- Extension</a>	September 18, 2020	Access	Allowed sponsors, regardless of their location, to operate at-risk after-school care programs
SFSP First Week Site Visits	<a href="#">COVID-19: Child Nutrition Response #49: Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program - Extension</a> <a href="#">COVID-19: Child Nutrition Response #65: Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program - Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #81: Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program for Summer 2021 Operations- Extension 3</a>	April 21, 2020	Administrative – sponsors	Provided flexibility for requirement to visit SFSP sites during first week of operation
SFSP Offer vs. Serve	<a href="#">COVID-19: Child Nutrition Response #51: Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the SFSP- Extension</a> <a href="#">COVID-19: Child Nutrition Response #67: Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the SFSP- Extension 2</a> <a href="#">COVID-19: Child Nutrition Response #79: Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the Summer Food Service Program for Summer 2021 Operations- Extension 3</a>	April 30, 2020	Access	Provided the flexibility to serve meals without using offer versus serve

Source: Child Nutrition COVID-19 Waivers (<https://www.fns.usda.gov/fns-disaster-assistance/fns-responds-covid-19/child-nutrition-covid-19-waivers>).

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

<sup>a</sup> Initial authorization date reflects the date the first waiver of this type was authorized for use.

<sup>b</sup> Expiration date reflects the expiration date of the final waiver extension.

## **Appendix B.**

### **Data Collection Methods and Data Quality**

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Data collection for the third year of the School Meals Operations Study involved obtaining survey and administrative data from the 68 State agencies in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands that administered NSLP, SBP, SSO SFSP, and CACFP.<sup>20</sup> All agencies completed the survey and provided administrative records data. In some States, a single agency completed these data collection activities. In other States, the data were provided by multiple agencies. This appendix provides information about the data collection process and the limitations of the data.

### A. Survey data collection

The State agency survey was administered as a web survey from October 2022 through January 2023.

#### 1. Survey content

The survey collected information on the FFCRA statutory reporting requirements for the 29 COVID-19 Child Nutrition nationwide waivers that FNS authorized for use during SY 2021–2022 and summer 2022 and the waiver extensions initially authorized for use in March 2020 and during SY 2020–2021. FFCRA requires each State agency that oversees the Child Nutrition Programs and uses a nationwide waiver to report on the use of each waiver by the State agency and local program operators, including a description of whether and how each waiver resulted in improved services to children.<sup>21</sup> In addition, three waiver extensions authorized for SY 2021–2022 had additional reporting requirements. FNS guidance instructed State agencies to report on the following:

- For the extension of the Nationwide Waiver to Extend Area Eligibility, how new meal sites were selected to benefit children who were previously eligible or newly eligible for program benefits due to the economic impacts of COVID-19;
- For the extension of 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 extension of 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 School Meals Operations study satisfied State agencies' reporting requirements for the nationwide waivers and waiver extensions. State agencies were required to respond to all survey questions about the waivers and waiver extension. Questions included a “don't know” response option. The survey also included questions about the operational and financial challenges State agencies experienced during SY 2021–2022.

#### 2. Survey data quality

State agencies generally provided substantive answers to the survey questions. Across all State agencies, respondents selected “don't know” as a response for 17 percent of survey items. This is the same percentage as the first State agency survey (conducted in spring 2021) and more than the 14 percent of items for which SAs responded “don't know” in the second State agency survey (conducted in spring 2022). Like prior year surveys, the prevalence of “don't know” responses varied greatly by State agency, survey section, and survey question, disproportionately affecting data quality in some areas. The sections

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<sup>20</sup> This study did not collect information on CACFP operations in adult day care centers, given its focus on Child Nutrition Programs.

<sup>21</sup> U.S. Congress. “Families First Coronavirus Response Act.” Pub. Law 116-127, 134 Stat. 185. March 18, 2020.

of the survey with the highest prevalence of “don’t know” responses were those containing questions about the CACFP Onsite Monitoring for Sponsors waiver, the Area Eligibility waiver, the School Meals Onsite Monitoring waiver, and the High School Offer vs. Serve Flexibility waiver. Each of these sections had “don’t know” responses for about 20 percent of questions. The survey section that contains questions about the SFSP Reimbursement for SSO waivers had the lowest prevalence of “don’t know” responses (1 percent).

In general, respondents were able to identify a response that fit their situation in the options provided. Across the survey, respondents entered an open-ended response in the “other-specify” field for 11 percent of survey items, which is slightly more than the 10 percent of survey items in the first State agency survey and less than the 13 percent of survey items in the second State agency survey. These responses were reviewed and assigned to new or existing response options, as applicable.

The question that asked why State agencies were not able to provide meal pattern flexibility files had the highest prevalence of “other-specify” responses at 67 percent. The prevalence of “other-specify” responses was about 25 percent for three other questions: (1) factors that contributed to State agencies’ financial challenges, (2) types of meal pattern violations for which State agencies waived fiscal action requirements, and (3) reasons State agencies used each waiver.

Survey data collected from State agencies on the Meal Pattern Flexibility waiver had certain limitations, primarily due to incomplete data. In the survey, State agencies that collected required data on waived meal components in each Child Nutrition Program were asked to submit a file with those data. The data included where, when, and for which meal components local program operators used the Meal Pattern Flexibility waiver. Those 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. The extent to which the required data were provided by State agencies varied, which affected data completeness and quality. Depending on the Child Nutrition Program, between 3 percent and 10 percent of State agencies with local program operators that used the waiver had incomplete data on which meal components were waived. The rate of missing Meal Pattern Flexibility waiver data is lower than in the previous two years of the study, which was an average of 12 percent of State agencies in the second survey and an average of 10 percent of State agencies in the first survey.

## B. Administrative data collection

The administrative data collection began on March 1, 2023. All State agencies provided data by early June 2023.

### 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. During SY 2021–2022, FNS required State agencies to report SSO data separately from NSLP and SBP data on the FNS-10 SSO, Report of School Program Operations. The data collected on the FNS reporting forms were the basis for the School Meals Operations Study administrative data request, although the study collected these data aggregated at the site or local program operator level, depending on the data that is available at the State agency, while FNS requires State agencies to report these data at the State-level.

The administrative data collected during Year 3 of the School Meals Operations Study included school-level FNS-10 and FNS-10 SSO data, site-level FNS-418 data, and outlet-level FNS-44 data for FY 2022, for the months of October 2021 through September 2022. When data were not available from State agencies at these levels, the study team collected SFA-level FNS-10 and FNS-10 SSO data, sponsor-level FNS-418 data, and institution-level FNS-44 data. In addition to the data elements regularly collected on these forms, the study requested identifying information and key characteristics of each school, site, outlet or SFA, sponsor, or institution.

### 2. Administrative data quality

Overall, State agencies were generally able to provide the requested administrative data. The level of disaggregation varied, although most State agencies provided some or all of the requested data at the lower level of disaggregation for each form—school, site, or outlet. About the same number of State agencies provided data at the lower level of disaggregation in the second and third years of the study. The level of completeness also varied by State agency, but overall across all State agencies, improved from prior years.

From April through October 2023, the study team reviewed the completeness of the administrative data and completed follow-up with State agencies to request missing data and clarify data elements or inconsistencies. As in the two prior years of the study, in Year 3 some State agencies were unable to provide certain data elements, which affected the completeness of the data. The data elements most commonly missing were both on the FNS-10 SSO and FNS-418, (1) an indicator of whether the SSO or SFSP site was made area eligible under the Area Eligibility waiver and (2) whether the SSO or SFSP site operated as an open or closed site.

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, FNS 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 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>22</sup>

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<sup>22</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 State agency-provided average daily meals or attendance.

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## **Appendix C.**

### **Supplemental Exhibits Related to Chapter II**

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**Exhibit C.1. Average percentage of State agencies reporting each proportion of SFAs that implemented certain meal delivery methods, meal options, and meal counting methods for NSLP, SBP, or SSO under the access-focused waivers during SY 2021–2022 or summer 2022**

Method	No SFAs	Less than half	About half	More than half	All SFAs	Don't know
<b>Meal delivery methods</b>						
Cafeteria service	12	10	15	42	12	9
Grab-and-go tables or kiosks in school buildings	6	48	12	17	3	14
Meals in the classroom	17	47	10	13	1	12
Walk-up sites outside of schools, centers, or other buildings	16	46	6	12	1	19
Curbside pick-up/ drive-through service	16	44	7	15	5	14
Mobile sites at which a bus or van delivers meals at pre-set times	48	33	1	2	0	16
Delivery with stops at individual homes	48	35	0	1	0	16
Other home delivery methods	62	10	0	0	0	28
<b>Meal options</b>						
Full week (5 days) of meals at one time	21	54	3	6	3	12
2–3 days of meals at one time	21	54	7	3	0	15
Weekend meals	51	31	2	0	0	16
Bulk food packages <sup>a</sup>	37	41	1	2	1	18
Frozen meals	44	33	0	1	1	22
Shelf-stable meals	26	40	2	3	2	27
<b>Meal counting options</b>						
Standard point of service system	6	20	17	40	7	9
Mobile technology (for example, laptop, tablet, or cell phone apps)	11	58	9	3	0	20
Paper rosters	4	56	16	10	3	12
Clickers	25	43	7	5	1	18
Circle, tally, or tick sheets, or another similar form	9	32	17	26	4	11
Other meal delivery method, option, or counting method <sup>b</sup>						
Bar code rosters	0	0	0	0	0	0
Generic cards	0	0	0	0	0	0
Sign-up sheets or online orders	0	3	0	0	0	0
Student meal service or ID cards	0	2	0	0	0	0
Tray counts	0	1	0	0	0	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Average percentages were calculated by dividing the number of State agencies that reported each proportion of SFAs that implemented certain meal delivery methods, meal options, and meal counting methods, or don't know, by the total number of State agencies that used the waiver in the program. Access-focused waivers used for NSLP, SBP, or SSO include SSO Operations, Non-congregate, Meal Time

Requirements, Parent and Guardian Pick-up, Meal Pattern Flexibility, High School Offer vs. Serve Flexibility, Area Eligibility, and SSO/SFSP Meal Service at School Sites.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<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 SFAs that used the “other” method specified.

**Exhibit C.2. Average percentage of State agencies reporting each proportion of sponsors that implemented certain meal delivery methods, meal options, and meal counting methods for SFSP under the access-focused waivers during SY 2021–2022 or summer 2022**

Method	No sponsors	Less than half	About half	More than half	All sponsors	Don't know
<b>Meal delivery methods</b>						
Cafeteria service	17	31	11	24	5	11
Grab-and-go tables or kiosks in school buildings	16	46	10	10	3	14
Meals in the classroom	28	48	3	2	0	19
Walk-up sites outside of schools, centers, or other buildings	8	42	20	18	1	12
Curbside pick-up/drive-through service	18	33	21	17	2	9
Mobile sites at which a bus or van delivers meals at pre-set times	36	44	6	3	0	11
Delivery with stops at individual homes	61	26	1	0	0	12
Other home delivery methods	73	4	0	0	0	23
<b>Meal options</b>						
Full week (5 days) of meals at one time	28	51	5	5	4	7
2–3 days of meals at one time	22	54	10	2	0	12
Weekend meals	28	49	4	2	0	16
Bulk food packages <sup>a</sup>	38	42	2	4	2	12
Frozen meals	44	30	1	1	2	22
Shelf-stable meals	29	42	4	4	2	19
<b>Meal counting options</b>						
Standard point of service system	15	33	19	16	5	12
Mobile technology (for example, laptop, tablet, or cell phone apps)	17	61	7	1	0	14
Paper rosters	17	51	16	4	3	8
Clickers	31	41	7	1	1	19
Circle, tally, or tick sheets, or another similar form	8	20	19	36	8	8
Other meal delivery method, option, or counting method <sup>b</sup>						
Student meal service or ID cards	0	2	0	0	0	0
Tray counts	0	1	0	0	0	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Average percentages were calculated by dividing the number of State agencies that reported each proportion of sponsors that implemented certain meal delivery methods, meal options, and meal counting methods, or don't know, by the total number of State agencies that used the waiver in the program. Access-

focused waivers used for SFSP include Non-congregate, Meal Time Requirements, Parent and Guardian Pick-up, Area Eligibility, and SSO/SFSP Meal Service at School Sites.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<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 sponsors that used the "other" method specified.

**Exhibit C.3. Average percentage of State agencies reporting each proportion of institutions that implemented certain meal delivery methods, meal options, and meal counting methods for CACFP under the access-focused waivers during SY 2021–2022**

Method	No institutions	Less than half	About half	More than half	All institutions	Don't know
<b>Meal delivery methods</b>						
Cafeteria service	30	25	9	5	2	28
Grab-and-go tables or kiosks in school buildings	31	28	6	8	1	25
Meals in the classroom	31	23	11	10	1	24
Walk-up sites outside of schools, centers, or other buildings	31	26	8	9	2	24
Curbside pick-up/drive-through service	20	27	15	14	5	18
Mobile sites at which a bus or van delivers meals at pre-set times	51	24	0	1	0	23
Delivery with stops at individual homes	45	29	1	2	0	22
Other home delivery methods	59	7	0	0	0	34
<b>Meal options</b>						
Full week (5 days) of meals at one time	25	37	8	5	5	19
2–3 days of meals at one time	28	33	10	9	1	18
Weekend meals	42	32	3	1	0	23
Bulk food packages <sup>a</sup>	31	40	2	0	2	25
Frozen meals	46	27	2	0	0	25
Shelf-stable meals	34	30	4	4	1	27
Supper and a snack through CACFP at-risk	26	26	6	16	8	18
<b>Meal counting options</b>						
Standard point of service system	16	21	11	16	12	22
Mobile technology (for example, laptop, tablet, or cell phone apps)	31	37	4	1	0	27
Paper rosters	12	20	17	15	14	21
Clickers	40	22	3	1	0	34
Circle, tally, or tick sheets, or another similar form	18	16	13	17	9	26
Other meal delivery method, option, or counting method <sup>b</sup>						
Daily attendance and driver delivery log	0	0	0	0	0	0
Parent signatures	0	0	0	0	0	0
Student meal service or ID cards	0	0	0	0	0	0
Tray counts	0	0	0	0	0	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Average percentages were calculated by dividing the number of State agencies that reported each proportion of institutions implemented certain meal delivery methods, meal options, and meal counting methods, or don't know, by the total number of State agencies that used the waiver. Access-focused waivers used for CACFP include Non-congregate, Meal Time Requirements, Parent and Guardian Pick-up, Meal Pattern Flexibility, and Area Eligibility.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<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 institutions that used the "other" method specified.



**Exhibit C.4. Average percentage of State agencies reporting certain proportions of local program operators that implemented certain meal delivery methods, meal options, and meal counting methods during SY 2021–2022 or summer 2022, across all access-focused waivers<sup>a</sup>**

Method	No LPOs	Less than half	About half	More than half	All LPOs	Don't know
<b>Meal delivery methods</b>						
Cafeteria service	18	19	13	28	8	15
Grab-and-go tables or kiosks in school buildings	15	42	10	13	3	17
Meals in the classroom	23	41	9	10	1	16
Walk-up sites outside of schools, centers, or other buildings	18	40	10	12	1	19
Curbside pick-up/drive-through service	17	37	12	15	4	14
Mobile sites at which a bus or van delivers meals at pre-set times	46	33	2	2	0	17
Delivery with stops at individual homes	50	31	0	1	0	17
Other home delivery methods	64	8	0	0	0	28
<b>Meal options</b>						
Full week (5 days) of meals at one time	23	49	5	6	4	13
2–3 days of meals at one time	23	48	8	5	0	15
Weekend meals	44	35	3	1	0	18
Bulk food packages <sup>b</sup>	36	41	2	2	2	18
Frozen meals	44	31	1	1	1	23
Shelf-stable meals	28	38	3	4	2	25
Supper and a snack through CACFP at-risk	26	26	6	16	8	18
<b>Meal counting options</b>						
Standard point of service system	11	23	16	28	8	13
Mobile technology (for example, laptop, tablet, or cell phone apps)	18	53	7	2	0	21
Paper rosters	9	45	16	10	6	13
Clickers	30	37	6	3	1	22
Circle, tally, or tick sheets, or another similar form	11	26	17	26	6	15
<b>Other meal delivery method, option, or counting method<sup>c</sup></b>						
Bar code rosters	0	0	0	0	0	0
Daily attendance and driver delivery log	0	0	0	0	0	0
Sign-up sheets or online orders	0	1	0	0	0	0
Student meal service or ID cards	0	2	0	0	0	0
Tray counts	0	1	0	0	0	0
Daily attendance and driver delivery log	0	0	0	0	0	0
Parent signatures	0	0	0	0	0	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Average percentages were calculated by dividing the total number of State agencies that reported each proportion of local program operators across each Child Nutrition Program by the total number of State agencies that used the waivers for the Child Nutrition Programs.

<sup>a</sup> Access-focused waivers used during SY 2021–2022 or summer 2022 include SSO Operations, Non-congregate, Meal Time Requirements, Parent and Guardian Pick-up, Meal Pattern Flexibility, High School Offer vs. Serve Flexibility, Area Eligibility, and SSO/SFSP Meal Service at School Sites.

<sup>b</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<sup>c</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 used the “other” method specified.

**Exhibit C.5. Average percentage of State agencies reporting certain proportions of local program operators that implemented certain meal delivery methods, meal options, and meal counting methods during SY 2020–2021, across all waivers newly authorized for use in SY 2020–2021<sup>a</sup>**

Method	No LPOs	Less than half	About half	More than half	All LPOs	Don't know
<b>Meal delivery methods</b>						
Cafeteria service	14	29	14	23	2	17
Grab-and-go tables or kiosks in school buildings	5	35	16	26	2	15
Meals in the classroom	9	34	21	19	1	16
Walk-up sites at schools, centers, or other buildings	7	36	8	26	3	19
Curbside pick-up/drive-through service	6	27	15	37	3	13
Mobile sites at which a bus or van delivers meals at pre-set times	20	57	6	3	0	15
Delivery with stops at individual homes	20	61	2	2	0	14
Other home delivery methods	38	25	0	0	0	37
<b>Meal options</b>						
Full week (5 days) of meals at one time	10	40	21	14	4	10
2–3 days of meals at one time	9	40	19	22	0	10
Weekend meals	12	46	10	20	0	10
Bulk food packages <sup>b</sup>	14	55	9	7	1	14
Frozen meals	25	42	6	3	2	23
Shelf-stable meals	17	41	12	6	1	22
<b>Meal counting methods</b>						
Standard point of service system	8	42	15	16	6	13
Mobile technology (for example, laptop, tablet, or cell phone apps)	15	47	10	5	0	23
Paper rosters	6	37	22	15	4	15
Clickers	21	35	11	8	1	24
Circle, tally, or tick sheets, or another similar form	5	13	20	42	5	14
<b>Other</b>						
Counting car hang tags or student IDs	0	1	0	0	0	0
Other meal counting form	0	2	1	0	1	0

Source: School Meals Operations Study, Option Period 1 COVID-19 State agency Survey.

Note: Average percentages were calculated by dividing the total number of State agencies that reported each proportion of local program operators across the three Child Nutrition Programs (SSO, SFSP, and CACFP) by the total number of State agencies that used the waivers for the Child Nutrition Programs.

<sup>a</sup> Waivers newly authorized for use in SY 2020–2021 include the SFSP/SSO Operations for SY 2020–2021 waiver and CACFP At-Risk Area Eligibility waiver.

**Exhibit C.6. Meals and snacks/supplements served in NSLP, SBP, SSO, and SFSP from October 2021 through September 2022**

	Oct. 2021	Nov. 2021	Dec. 2021	Jan. 2022	Feb. 2022	Mar. 2022	Apr. 2022	May 2022	Jun. 2022	Jul. 2022	Aug. 2022	Sep. 2022
NSLP	22,241,457	20,718,256	16,869,758	19,745,863	21,691,931	24,847,560	21,949,015	22,067,252	6,932,400	5,616,318	253,926,485	524,801,241
SBP	5,043,402	4,366,284	3,471,584	4,138,602	4,411,338	4,510,455	4,707,045	4,642,363	1,786,326	3,562,474	122,237,040	256,897,830
SSO	820,530,206	746,946,310	589,702,955	672,705,852	732,231,854	865,262,491	761,261,174	817,984,597	204,252,514	23,143,471	20,179,823	11,371,315
SFSP	6,599	1,644	25,479	19,635	19,386	10,233	0	762,788	37,399,602	63,115,638	41,695,981	3,803,820
<b>Total</b>	<b>847,821,664</b>	<b>772,032,494</b>	<b>610,069,776</b>	<b>696,609,952</b>	<b>758,354,509</b>	<b>894,630,739</b>	<b>787,917,234</b>	<b>845,457,000</b>	<b>250,370,842</b>	<b>95,437,901</b>	<b>438,039,329</b>	<b>796,874,206</b>

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2022.

Note: N = 54 (all 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands).

**Exhibit C.7. Number of local program operators participating in Child Nutrition Programs, October 2021 through September 2022**

	Oct. 2021	Nov. 2021	Dec. 2021	Jan. 2022	Feb. 2022	Mar. 2022	Apr. 2022	May 2022	Jun. 2022	Jul. 2022	Aug. 2022	Sep. 2022
NSLP	5,073	5,207	5,187	5,288	5,384	5,413	5,352	5,111	2,807	1,733	13,951	18,476
SBP	932	941	923	912	913	903	901	920	973	1,439	12,414	16,402
SSO	17,670	17,693	17,724	17,487	17,495	17,504	17,500	17,453	10,961	2,386	1,187	497
FNS-10 program type unknown	86	84	83	82	80	77	77	76	35	17	64	74
SFSP	4	1	3	6	3	1	0	525	3,993	4,668	3,030	140
<b>Total<sup>a</sup></b>	<b>19,383</b>	<b>19,397</b>	<b>19,398</b>	<b>19,181</b>	<b>19,175</b>	<b>19,178</b>	<b>19,165</b>	<b>19,624</b>	<b>16,175</b>	<b>8,656</b>	<b>17,696</b>	<b>19,126</b>

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2022.

Notes: All 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands provided SFA- sponsor- or institution-level data included in this table. The number of SFAs (NSLP and SBP) and sponsors (SSO and SFSP) operating during each month is calculated for each program. If the same SFA, sponsor, or institution operated in multiple programs, it is counted twice in the total. Counts of SFAs, sponsors, or institutions for which the data reported on the FNS-10 lacked information about whether meals were provided through NSLP, SBP, or SSO are included in the "FNS-10 program type unknown" row. Percent change was calculated by dividing the number of SFAs, sponsors, or institutions providing meals, milk, or snacks/supplements each month divided by the number providing meals, milk, or snacks/supplements in the previous month. n.a. in the Percent change column indicate that no SFAs, sponsors, or institutions operated the program in October 2020.

<sup>a</sup> Because some schools, sites, or outlets participated in more than one program, numbers shown in Total rows may not equal the sums of rows above. Because some States did not participate in all programs, numbers of States shown in Total rows may not match the number of States shown in rows above.

**Exhibit C.8. Number of Children participating in NSLP, SBP, SSO, and SFSP, October 2021 through September 2022**

	Oct. 2021	Nov. 2021	Dec. 2021	Jan. 2022	Feb. 2022	Mar. 2022	Apr. 2022	May 2022	Jun. 2022	Jul. 2022	Aug. 2022	Sep. 2022
NSLP	401,204	409,330	412,618	382,849	417,446	416,512	409,048	409,452	238,748	414,881	18,330,969	24,186,016
SBP	232,254	240,502	234,120	214,091	235,457	238,419	234,531	248,926	143,147	259,049	8,354,759	11,745,418
SSO	26,517,662	28,022,599	27,282,657	25,168,473	27,783,144	27,994,664	27,937,745	26,860,637	11,340,385	1,374,040	1,161,992	483,631
SFSP	810	274	1,523	6,602	5,782	574	0	157,898	1,724,332	2,295,864	1,451,819	307,066
<b>Total<sup>a</sup></b>	<b>26,923,026</b>	<b>28,436,035</b>	<b>27,699,602</b>	<b>25,560,350</b>	<b>28,209,290</b>	<b>28,414,933</b>	<b>28,349,829</b>	<b>27,434,669</b>	<b>13,313,551</b>	<b>4,093,439</b>	<b>21,001,915</b>	<b>25,053,867</b>

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2022.

Note: 53 States provided SFA- sponsor- or institution-level data included in this table. Minnesota did not provide operating days or average daily meals and is therefore excluded from this table. 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. Child participation data reported on the FNS-10 that lacked information about whether meals were provided through NSLP, SBP, or SSO are included in the "FNS-10 program type unknown" row. Percent change was calculated by dividing monthly child participation by child participation in the previous 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.

n.a. = not applicable.

**Exhibit C.9. Number of meals and snacks/supplements served in NSLP, SBP, SSO, and SFSP October 2020 through September 2021**

	Oct. 2020	Nov. 2020	Dec. 2020	Jan. 2021	Feb. 2021	Mar. 2021	Apr. 2021	May 2021	Jun. 2021	Jul. 2021	Aug. 2021	Sep. 2021
NSLP	38,393,020	27,073,280	24,490,440	30,684,634	32,430,193	38,353,817	42,159,750	37,763,281	8,924,948	1,821,864	33,165,037	53,807,367
SBP	21,071,597	14,599,241	12,830,595	15,409,827	16,286,382	19,024,567	19,295,217	17,730,639	3,555,750	857,065	15,858,585	24,903,712
SSO	188,020,634	172,943,623	155,824,431	177,091,759	182,229,453	232,334,685	233,488,181	236,575,382	107,505,734	58,479,955	300,097,589	659,409,729
FNS-10 Program Type Unknown	17,412,344	28,897,349	22,024,531	27,312,075	29,373,709	38,182,706	39,814,403	35,280,148	8,486,348	4,196,000	17,290,446	49,408,403
SFSP	313,124,786	276,138,037	256,030,062	292,944,878	297,841,871	378,809,553	378,310,313	370,994,126	204,882,762	154,015,889	104,445,488	45,356,551
<b>Total</b>	<b>578,022,381</b>	<b>519,651,530</b>	<b>471,200,059</b>	<b>543,443,173</b>	<b>558,161,608</b>	<b>706,705,328</b>	<b>713,067,864</b>	<b>698,343,576</b>	<b>333,355,542</b>	<b>219,370,773</b>	<b>470,857,145</b>	<b>832,885,762</b>

Source: School Meals Operations Study, disaggregated FNS-10 and FNS-418 data from fiscal year 2021.

Notes: N = 54 (all 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands). Meal counts for which the data reported on the FNS-10 lacked information about whether the meals were provided through NSLP, SBP, or SSO are included in the "FNS-10 program type unknown" row.

**Exhibit C.10. Number of meals and snacks/supplements served in NSLP, SBP, SSO, and SFSP October 2019 through September 2020**

	Oct. 2019	Nov. 2019	Dec. 2019	Jan. 2020	Feb. 2020	Mar. 2020	Apr. 2020	May 2020	Jun. 2020	Jul. 2020	Aug. 2020	Sep. 2020
NSLP	597,494,228	467,630,919	410,995,746	523,100,805	505,484,748	234,240,788	3,027,758	2,831,666	2,523,832	3,881,886	37,296,414	62,080,661
SBP	297,412,630	232,656,530	199,904,912	252,397,496	247,581,410	111,681,258	2,372,161	2,205,968	1,982,874	3,361,931	21,687,739	33,961,741
SSO	0	0	0	0		108,045,756	183,902,267	178,607,962	116,847,972	63,287,442	44,144,875	127,341,085
SFSP <sup>a</sup>	0	0	0	0	0	75,129,703	235,635,040	243,482,688	191,229,138	188,496,693	135,847,004	216,962,714
<b>Total</b>	<b>894,906,858</b>	<b>700,287,449</b>	<b>610,900,658</b>	<b>775,498,301</b>	<b>753,066,158</b>	<b>529,097,505</b>	<b>424,937,226</b>	<b>427,128,284</b>	<b>312,583,816</b>	<b>259,027,952</b>	<b>238,976,032</b>	<b>440,346,201</b>

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

Note: N = 54 (all 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands).

<sup>a</sup> The number meals and supplements served in SFSP from March through September 2020 reported here differs from the numbers in the School Meals Operations Study Year 1 report, which showed between 59 million and 199 million meals served in SFSP each month between March and September. After publication of the Year 1 report, the method used to tabulate the number of SFSP meals served in Minnesota was revised to sum multiple claim revisions instead of using only the claim with the largest meal count.

## **Appendix D.**

### **Supplemental Exhibits Related to Chapter III**

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**Exhibit D.1. Total number of State agencies that used each waiver during SY 2021–2022 or summer 2022**

Waiver	Nationwide
SSO Operations	52
SFSP Reimbursement for SSO	53
Non-congregate	67
Meal Time Requirements	68
Parent and Guardian Pick-up	68
Meal Pattern Flexibility	63
High School Offer vs. Serve Flexibility	53
Area Eligibility	63
School Meals Onsite Monitoring	54
CACFP Onsite Monitoring for State Agencies	50
CACFP Onsite Monitoring for Sponsors	52
Administrative Reviews for SSO Operators	48
School Wellness Policy Assessments	41
SFSP Half Aggregate Monitoring for State Agencies and Sponsors	46
Fiscal Action Flexibility for Meal Pattern Violations	52
SSO/SFSP Meal Service at School Sites	52
Child Nutrition Program Reporting Requirements	51
SSO/SFSP Area Eligibility for Closed Enrolled Sites	48
SFSP Application Deadlines and Reimbursements	37

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Sixty-eight 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.

**Exhibit D.2. Total number of State agencies in which local program operators used each waiver during SY 2021–2022 or summer 2022, by Child Nutrition Program**

Waiver	NSLP	SBP	SSO	SFSP	CACFP
SSO Operations	n.a.	n.a.	52	n.a.	n.a.
SFSP Reimbursement for SSO	n.a.	n.a.	53	n.a.	n.a.
Non-congregate	24	23	51	43	46
Meal Time Requirements	21	21	49	42	43
Parent and Guardian Pick-up	20	19	47	38	39
Meal Pattern Flexibility	30	29	49	n.a.	33
High School Offer vs. Serve Flexibility	25	n.a.	47	n.a.	n.a.
Area Eligibility	29	n.a.	32	34	42
School Meals Onsite Monitoring	37	36	n.a.	n.a.	n.a.
CACFP Onsite Monitoring for State Agencies	n.a.	n.a.	n.a.	n.a.	50
CACFP Onsite Monitoring for Sponsors	n.a.	n.a.	n.a.	n.a.	51
Administrative Reviews for SSO Operators	n.a.	n.a.	48	n.a.	n.a.
School Wellness Policy Assessments	36	34	n.a.	n.a.	n.a.
SFSP Half Aggregate Monitoring for State Agencies and Sponsors	n.a.	n.a.	n.a.	46	n.a.
Fiscal Action Flexibility for Meal Pattern Violations	52	52	50	n.a.	n.a.
SSO/SFSP Meal Service at School Sites	n.a.	n.a.	38	9	n.a.
Child Nutrition Program Reporting Requirements	51	51	49	n.a.	n.a.
SSO/SFSP Area Eligibility for Closed Enrolled Sites	n.a.	n.a.	28	37	n.a.
SFSP Application Deadlines and Reimbursements	n.a.	n.a.	n.a.	21	n.a.

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Sixty-eight 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. By program, 56 State agencies administered NSLP and SBP, 54 administered SSO; 53 administered SFSP; and 55 administered CACFP.

**Exhibit D.3. State agency reported total number and calculated percentage of all local program operators that used each waiver during SY 2021–2022, by Child Nutrition Program**

Waiver	NSLP			SBP			SSO			SFSP			CACFP institutions: Child care centers			CACFP institutions: Family day care homes			
	#	%	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>	
SSO Operations	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	16,806	95	0	.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
SFSP Reimbursement for SSO	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	16,811	95	0	.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Non-congregate	1,978	11	4	1,012	6	4	6,349	43	8	396	9	9	4,779	19	5	877	>100	6	
Meal Time Requirements	869	5	5	690	4	6	5,685	39	9	281	6	6	3,841	18	11	240	40	9	
Parent and Guardian Pick-up	653	4	3	519	3	4	5,897	39	7	251	6	5	3,000	13	6	212	34	8	
Meal Pattern Flexibility	1,656	9	2	1,738	11	3	7,552	49	2	n.a.	n.a.	n.a.	1,171	6	4	540	96	5	
High School Offer vs. Serve Flexibility	579	4	5	n.a.	n.a.	n.a.	4,436	38	16	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
Area Eligibility	2,083	12	6	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	309	8	10	3,425	17	6	954	>100	6	
School Meals Onsite Monitoring - SFAs	2,265	22	12	1,986	22	12	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
CACFP Onsite Monitoring for Sponsors	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	5,999	46	12	1,006	>100	10	
School Wellness Policy Assessments	4,130	33	5	3,702	37	6	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
SSO/SFSP Meal Service at School Sites	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	3,094	36	9	287	11	2	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	

Source: School Meals Operations Study, Option Period 2 COVID-19 State agency Survey and disaggregated FNS-10, -418, and -44 data, fiscal year 2022.

Note: Program percentages were calculated by dividing the number of local program operators that State agencies reported in the survey used each waiver during SY 2021–2022 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. 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 in SY 2021–2022, 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.”

<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.

**Exhibit D.4. Total number and percentage of State agencies in which local program operators used each waiver from March through September 2020, by Child Nutrition Program**

Waiver	NSLP #	NSLP %	SBP #	SBP %	SSO #	SSO %	SFSP #	SFSP %	CACFP #	CACFP %
Meal Service Time Flexibility	44	79	43	77	40	71	53	98	52	95
Non-congregate	41	73	40	71	39	70	53	98	53	96
Afterschool Activity Requirements in NSLP/CACFP	31	55	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	43	78
Meal Pattern Flexibility	38	68	38	68	36	64	42	78	42	76
Parent Pick-up	39	70	40	71	38	68	52	96	50	91
CEP Deadlines in NSLP/SBP	52	93	48	86	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
CACFP Monitoring for Sponsors	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	54	98
School Meals Onsite Monitoring - Revised	45	80	43	77	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
SFSP Onsite Monitoring for Sponsors	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	52	96	n.a.	n.a.
60-Day Reporting Requirements	30	54	27	48	n.a.	n.a.	7	13	37	67
SFSP/SSO Area Eligibility for Closed Enrolled Sites	n.a.	n.a.	n.a.	n.a.	34	61	47	87	n.a.	n.a.
SFSP First Week Site Visits	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	53	98	n.a.	n.a.
SFSP Offer vs. Serve Flexibilities	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	51	94	n.a.	n.a.
SFSP/SSO Meal Service Time	n.a.	n.a.	n.a.	n.a.	39	70	52	96	n.a.	n.a.
School Wellness Policy Assessments	42	75	38	68	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
NSLP/SFSP Food Service Management Contract Duration	31	55	n.a.	n.a.	n.a.	n.a.	24	44	n.a.	n.a.
SFSP/SSO Unanticipated School Closure Operations	n.a.	n.a.	n.a.	n.a.	39	70	49	91	n.a.	n.a.
SFSP/SSO Area Eligibility	n.a.	n.a.	n.a.	n.a.	38	68	44	81	n.a.	n.a.

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. Fifty-six State agencies oversaw NSLP, SBP, and SSO; 54 oversaw SFSP; and 55 oversaw CACFP. The waivers included here were used by local program operators.

**Exhibit D.5. Total number and percentage of State agencies that used each nationwide waiver newly authorized for use in SY 2020–2021**

Waiver	Number of State agencies	Percent of State Agencies	<i>n</i>
SFSP/SSO Operations – SSO	36	67	54
SFSP/SSO Operations – SFSP	51	94	54
CACFP At-Risk Area Eligibility	49	89	55
Child Nutrition Programs Reporting Requirements	54	96	56
CEP Deadlines in NSLP/SBP	49	88	56
Experienced SFSP Sponsors	48	89	54

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

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. By program, 56 State agencies administered NSLP and SBP; 54 administered SSO; 54 administered SFSP; and 55 administered CACFP.

**Exhibit D.6. Percentage of State agencies reporting that access-focused waivers improved SSO services to children in certain ways during SY 2021–2022 or summer 2022, by waiver**

Improved services to children	SSO Operations	Non-congregate	Meal Time Requirements	Parent and Guardian Pick-up	Meal Pattern Flexibility	High School Offer vs. Serve Flexibility	Area Eligibility	SSO/SFSP Meal Service at School Sites
<b>Number of State agencies that used waiver</b>	<b>52</b>	<b>51</b>	<b>49</b>	<b>47</b>	<b>49</b>	<b>47</b>	<b>32</b>	<b>38</b>
<b>Site Options</b>								
Greater geographic distribution of sites	52	65	51	55	8	13	72	42
Increased number of sites	44	53	55	49	12	9	84	47
Increased alternative meal delivery methods	65	82	84	85	31	55	34	50
<b>Meal Options</b>								
Allowed pick-up of multiple meals at one time	62	82	88	85	24	55	28	47
Allowed distribution of bulk food packages <sup>a</sup>	44	67	69	68	24	43	28	34
Allowed service of available foods when supply issues occurred	63	65	51	38	84	45	31	34
<b>Other</b>								
Improved safety for children by not requiring congregate feeding or meal pick-up	71	92	80	89	29	60	44	58
Reduced barriers to receiving meals	83	88	90	91	63	87	81	87
Increased participation	81	84	82	83	31	40	91	79
<b>Other<sup>b</sup></b>								
Allowed fast pick-up	n.a.	n.a.	n.a.	n.a.	2	n.a.	n.a.	n.a.
Allowed meal service to align with other initiatives, for example covid test distribution	n.a.	2	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Enabled flexible meal service as school operations changed	n.a.	2	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Increased administrative resources for providing meals	2	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Increased children's access to meals	n.a.	2	10	4	n.a.	n.a.	n.a.	n.a.
Increased safety of meal service	n.a.	n.a.	2	2	n.a.	4	n.a.	n.a.

**Appendix D. Supplemental Exhibits Related to Chapter III**

Improved services to children	SSO Operations	Non-congregate	Meal Time Requirements	Parent and Guardian Pick-up	Meal Pattern Flexibility	High School Offer vs. Serve Flexibility	Area Eligibility	SSO/SFSP Meal Service at School Sites
Don't know how this waiver improved services to children	0	0	0	2	4	2	3	5
This waiver did not improve services to children	0	0	0	0	2	4	0	5

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement across the waivers during SY 2021–2022 or summer 2022 by the total number of State agencies that used the access-focused waivers for the program.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<sup>b</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the access-focused waivers in the program.

**Exhibit D.7. Percentage of State agencies reporting that local program operators used each waiver in SY 2020–2021 compared to March through September 2020, by Child Nutrition Program**

Child Nutrition Program	March–September 2020					SY 2020–2021				
	NSLP	SBP	SSO	SFSP	CACFP	NSLP	SBP	SSO	SFSP	CACFP
SSO and SFSP Operations <sup>a</sup>	n.a.	n.a.	70	91	n.a.	n.a.	n.a.	67	94	n.a.
Non-congregate	73	71	70	98	96	88	84	74	96	91
Meal Service Time Flexibility	79	77	71	98	95	88	86	74	96	87
Parent and Guardian Pick-up	70	71	68	96	91	88	84	70	98	89

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection, SYs 2020–2021 and 2021–2022.

Note: Sixty-seven State agencies administered at least one of the relevant Child Nutrition Programs in the 50 States, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands during this time period. The waivers included here were used by local program operators.

<sup>a</sup> Although this waiver was newly authorized in SY 2020–2021, it is similar in intent to the SFSP/SSO Unanticipated School Closure Operations waiver that expired in June 2020.

n.a. = not applicable.



**Exhibit D.8. Percentage of State agencies reporting that access-focused waivers improved NSLP services to children in certain ways during SY 2021–2022 or summer 2022, by waiver**

Improved services to children	Non-congregate	Meal Time Requirements	Parent and Guardian Pick-up	Meal Pattern Flexibility	High School Offer vs. Serve Flexibility	Area Eligibility
<b>Number of State agencies that used waiver</b>	<b>24</b>	<b>21</b>	<b>20</b>	<b>30</b>	<b>25</b>	<b>29</b>
<b>Site Options</b>						
Greater geographic distribution of sites	38	38	30	7	12	55
Increased number of sites	25	29	25	13	8	62
Increased alternative meal delivery methods	58	62	60	20	52	21
<b>Meal Options</b>						
Allowed pick-up of multiple meals at one time	54	62	60	20	48	14
Allowed distribution of bulk food packages <sup>a</sup>	46	57	50	17	40	7
Allowed service of available foods when supply issues occurred	71	52	30	70	40	17
<b>Other</b>						
Improved safety for children by not requiring congregate feeding or meal pick-up	83	71	80	23	56	31
Reduced barriers to receiving meals	79	76	85	57	76	83
Increased participation	75	71	80	27	40	79
<b>Other<sup>b</sup></b>						
Allowed meal service to align with other initiatives, for example covid test distribution	4	n.a.	n.a.	n.a.	n.a.	n.a.
Enabled flexible meal service as school operations changed	4	5	n.a.	n.a.	n.a.	n.a.
Financial relief for families	n.a.	n.a.	n.a.	n.a.	n.a.	3
Increased children's access to meals	4	14	5	n.a.	n.a.	n.a.
Increased safety of meal service	n.a.	n.a.	n.a.	n.a.	4	n.a.
Don't know how this waiver improved services to children	0	0	10	7	12	3
This waiver did not improve services to children	4	10	5	0	0	3

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement across the waivers during SY 2021–2022 or summer 2022 by the total number of State agencies that used the access-focused waivers for the program.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<sup>b</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the access-focused waivers in the program.

**Exhibit D.9. Percentage of State agencies reporting that access-focused waivers improved SBP services to children in certain ways during SY 2021–2022 or summer 2022, by waiver**

Improved services to children	Non-congregate	Meal Time Requirements	Parent and Guardian Pick-up	Meal Pattern Flexibility
<b>Number of State agencies that used waiver</b>	<b>23</b>	<b>21</b>	<b>19</b>	<b>29</b>
<b>Site Options</b>				
Greater geographic distribution of sites	39	33	32	7
Increased number of sites	26	29	21	14
Increased alternative meal delivery methods	61	57	58	21
<b>Meal Options</b>				
Allowed pick-up of multiple meals at one time	57	62	63	21
Allowed distribution of bulk food packages <sup>a</sup>	48	57	53	17
Allowed service of available foods when supply issues occurred	74	48	32	72
<b>Other</b>				
Improved safety for children by not requiring congregate feeding or meal pick-up	87	71	84	24
Reduced barriers to receiving meals	83	76	84	59
Increased participation	78	71	79	28
<b>Other<sup>b</sup></b>				
Allowed meal service to align with other initiatives, for example covid test distribution	4	n.a.	n.a.	n.a.
Enabled flexible meal service as school operations changed	4	5	n.a.	n.a.
Increased children's access to meals	4	14	5	n.a.
Don't know how this waiver improved services to children	0	0	11	3
This waiver did not improve services to children	0	10	5	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement across the waivers during SY 2021–2022 or summer 2022 by the total number of State agencies that used the access-focused waivers for the program.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<sup>b</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each “ Don’t know” response by the total number of State agencies that used the access-focused waivers in the program.

**Exhibit D.10. Percentage of State agencies reporting that access-focused waivers improved SFSP services to children in certain ways during SY 2021–2022 or summer 2022, by waiver**

Improved services to children	Non-congregate	Meal Time Requirements	Parent and Guardian Pick-up	Area Eligibility	SSO/SFSP Meal Service at School Sites
<b>Number of State agencies that used waiver</b>	<b>43</b>	<b>42</b>	<b>38</b>	<b>34</b>	<b>9</b>
<b>Site Options</b>					
Greater geographic distribution of sites	63	48	58	71	56
Increased number of sites	65	60	55	85	56
Increased alternative meal delivery methods	81	76	74	38	56
<b>Meal Options</b>					
Allowed pick-up of multiple meals at one time	81	88	82	26	44
Allowed distribution of bulk food packages <sup>a</sup>	63	67	66	21	44
Allowed service of available foods when supply issues occurred	60	45	42	18	33
<b>Other</b>					
Improved safety for children by not requiring congregate feeding or meal pick-up	91	71	82	32	44
Reduced barriers to receiving meals	91	88	89	85	78
Increased participation	79	76	76	85	67
<b>Other<sup>b</sup></b>					
Improved nutrition for children	n.a.	n.a.	n.a.	3	n.a.
Increased children's access to meals	9	12	5	3	n.a.
Increased safety of meal service	.	2	3	n.a.	n.a.
Reduced stigma of receiving free meals	2	2	3	3	n.a.
Don't know how this waiver improved services to children	0	0	5	3	11
This waiver did not improve services to children	0	2	0	0	11

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement across the waivers during SY 2021–2022 or summer 2022 by the total number of State agencies that used the access-focused waivers for the program.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<sup>b</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the access-focused waivers in the program.

**Exhibit D.11. Percentage of State agencies reporting that access-focused waivers improved CACFP services to children in certain ways during SY 2021–2022 or summer 2022, by waiver**

Improved services to children	Non-congregate	Meal Time Requirements	Parent and Guardian Pick-up	Meal Pattern Flexibility	Area Eligibility
<b>Number of State agencies that used waiver</b>	<b>46</b>	<b>43</b>	<b>39</b>	<b>33</b>	<b>42</b>
<b>Site Options</b>					
Greater geographic distribution of sites	48	42	44	9	74
Increased number of sites	41	35	41	12	79
Increased alternative meal delivery methods	91	74	69	18	31
<b>Meal Options</b>					
Allowed pick-up of multiple meals at one time	87	86	85	15	19
Allowed distribution of bulk food packages <sup>a</sup>	61	63	64	15	19
Allowed service of available foods when supply issues occurred	54	37	38	73	17
<b>Other</b>					
Improved safety for children by not requiring congregate feeding or meal pick-up	91	84	92	12	26
Reduced barriers to receiving meals	87	84	90	52	81
Increased participation	70	72	72	15	71
<b>Other<sup>b</sup></b>					
Allowed families to eat together at home	2	n.a.	n.a.	n.a.	n.a.
Improved nutrition for children	n.a.	n.a.	n.a.	n.a.	2
Increased children's access to meals	n.a.	7	5	3	2
Increased safety of meal service	n.a.	2	3	3	2
Meals served at a convenient time for children/families	n.a.	2	n.a.	n.a.	n.a.
Reduced stigma of receiving free meals	2	2	3	n.a.	2
Don't know how this waiver improved services to children	0	0	3	12	7
This waiver did not improve services to children	0	0	0	6	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement across the waivers during SY 2021–2022 or summer 2022 by the total number of State agencies that used the access-focused waivers for the program.

<sup>a</sup> Bulk food packages: Food packages that contain items that could be used for multiple meals or portion sizes.

<sup>b</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the waiver in the program.

**Exhibit D.12. Percentage of State agencies in which SFAs using the Meal Pattern Flexibility waiver waived requirements for each food component during SY 2021–2022, by Child Nutrition Program**

Food component	NSLP	SBP	SSO	CACFP
Milk	73	72	88	70
Meat/meat alternates	17	17	14	0
Grains	80	79	88	82
Fruits	17	17	20	0
Vegetables	73	72	86	18
Don't know <sup>a</sup>	3	3	2	6
No response <sup>b</sup>	10	10	4	3
<b>Vegetable subgroups</b>				
Dark green	27	n.a.	31	n.a.
Red/orange	27	n.a.	24	n.a.
Starchy	20	n.a.	20	n.a.
Legumes	33	n.a.	31	n.a.
Other	20	n.a.	16	n.a.
Don't know <sup>a</sup>	0	n.a.	2	n.a.
No response <sup>b</sup>	47	n.a.	51	n.a.

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each component or subgroup by the total number of State agencies that used the waiver in the program.

<sup>a</sup> The percentage of State agencies that reported they did not know which components SFAs waived, after reporting that the waiver was used in the program. State agency percentages calculated excluding those responding “don't know.”

<sup>b</sup> State agencies either provided a file documenting SFAs 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.



**Exhibit D.13. Percentage of State agencies reporting that the majority of local program operators with the Meal Pattern Flexibility waiver extension during SY 2021–2022 waived components in each program for certain time periods**

Time Period	Percentage
<b>NSLP</b>	
Component requirements were waived for the entirety of SY 2021–2022	67
Component requirements were waived for specific days or weeks during SY 2021–2022	10
Component requirements were waived for specific months during SY 2021–2022	10
Don't know	3
No response <sup>a</sup>	10
<b>SBP</b>	
Component requirements were waived for the entirety of SY 2021–2022	62
Component requirements were waived for specific days or weeks during SY 2021–2022	10
Component requirements were waived for specific months during SY 2021–2022	10
Don't know	3
No response <sup>a</sup>	14
<b>SSO</b>	
Component requirements were waived for the entirety of SY 2021–2022	71
Component requirements were waived for specific days or weeks during SY 2021–2022	6
Component requirements were waived for specific months during SY 2021–2022	10
Don't know	6
No response <sup>a</sup>	6
<b>CACFP</b>	
Component requirements were waived for the entirety of SY 2021–2022	70
Component requirements were waived for specific days or weeks during SY 2021–2022	9
Component requirements were waived for specific months during SY 2021–2022	9
Don't know	6
No response <sup>a</sup>	6

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each time period by the total number of State agencies that used the waiver in the program.

<sup>a</sup> State agencies either provided a file documenting local program operators that used the meal pattern flexibility 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 time periods for which requirements were waived.

**Exhibit D.14. Total number and percentage of State agencies in which local program operators used each program operations waiver extension in SY 2020–2021, by Child Nutrition Program**

Waiver	NSLP #	NSLP %	SBP #	SPB %	SSO #	SSO %	SFSP #	SFSP %	CACFP #	CACFP %
Non-congregate	49	88	47	84	40	74	52	96	50	91
Meal Service Time Flexibility	49	88	48	86	40	74	52	96	48	87
Parent and Guardian Pick-up	49	88	47	84	38	70	53	98	49	89
Meal Pattern Flexibility	43	77	43	77	35	65	43	80	44	80
SFSP/SSO Area Eligibility	n.a.	n.a.	n.a.	n.a.	34	63	48	89	n.a.	
Closed-Enrolled Area Eligibility	n.a.	n.a.	n.a.	n.a.	38	70	49	91	n.a.	
SFSP Offer vs. Serve	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	46	85	n.a.	
FSMC Contract Duration	38	68	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

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. Fifty-six State agencies oversaw NSLP and SBP; 54 oversaw SSO and SFSP; and 55 oversaw CACFP. The waivers included here were used by local program operators.

**Exhibit D.15. Total number and percentage of State agencies in which local program operators used each program operations waiver extension in summer 2021**

Waiver	SSO #	SSO %	SFSP #	SFSP %
Non-congregate	38	70	53	98
Meal Service Time Flexibility	38	70	53	98
Closed-Enrolled Area Eligibility	35	65	49	91
SFSP Offer vs. Serve	n.a.	n.a.	44	81
Parent and Guardian Pick-up	37	69	52	96
SFSP/SSO Area Eligibility	35	65	47	87
Meal Pattern Flexibility	30	56	n.a.	n.a.

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

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. Fifty-four State agencies oversaw SSO and SFSP. The waivers included here were used by local program operators.

**Exhibit D.16. State agency reported approximate proportion of SFAs with the Area Eligibility waiver that selected new NSLP afterschool programs or SSO meal sites to serve children who were previously or newly eligible for benefits using certain methods, during SY 2021–2022 or summer 2022**

Method	Median	Mode	Don't Know <sup>a</sup>
No methods used- all sites approved as area eligible	3	0	9
Analyzed unemployment data	0	0	14
Analyzed prior year school meals eligibility data	1	0	10
Identified site(s) that were area eligible in prior years	1	0	10
Targeted near-eligible sites, such as sites where 40% of children were eligible for free or reduced-price meals	0	0	14
Other <sup>b</sup>			
Aligned meal sites with summer programming	3		0
Reviewed Capacity Builder Map data from USDA	3		0
Reviewed SFA justification information	4		0
Reviewed State low income data	3		0
Did not use any methods to target new meal sites	0	0	12

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: State agencies reported the proportion of SFAs on a 5-point scale: that included none (0), less than half (1), about half (2), more than half (3), and all (4).

The median reflects the middle value in the distribution when all State agency responses are arranged on that scale, with half of the State agencies' responses falling on each side of the median. If the analysis includes an even number of responses, the median is identified as the midpoint between the two middle values. Because these are categorical response options, if the median is identified as a half, such as 2.5, it is rounded up to the whole number.

The mode reflects the proportion of SFAs most frequently reported by State agencies. If State agencies reported multiple proportions with the greatest frequency, each proportion is shown. If there is no mode, it is shown as missing.

The Area Eligibility waiver was used by 29 State agencies for NSLP and 32 State agencies for SSO.

<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 SFAs that provided the "other" method specified.

**Exhibit D.17. State agency reported approximate proportion of institutions with the Area Eligibility waiver that selected new CACFP meal sites to serve children who were previously or newly eligible for benefits using certain methods, during SY 2021–2022**

Method	Median	Mode	Don't Know <sup>a</sup>
No methods used- all sites approved as area eligible	3	0	10
Analyzed unemployment data	0	0	15
Analyzed prior year school meals eligibility data	0	0	14
Identified site(s) that were area eligible in prior years	0	0	14
Targeted near-eligible sites, such as sites where 40% of children were eligible for free or reduced-price meals	0	0	14
Other <sup>b</sup>			
Reviewed unemployment data and availability of childcare	n.a.	n.a.	0
Did not use any methods to target new meal sites	0	0	12

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: State agencies reported the proportion of institutions on a 5-point scale: that included none (0), less than half (1), about half (2), more than half (3), and all (4).

The median reflects the middle value in the distribution when all State agency responses are arranged on that scale, with half of the State agencies' responses falling on each side of the median. If the analysis includes an even number of responses, the median is identified as the midpoint between the two middle values. Because these are categorical response options, if the median is identified as a half, such as 2.5, it is rounded up to the whole number.

The mode reflects the proportion of institutions most frequently reported by State agencies. If State agencies reported multiple proportions with the greatest frequency, each proportion is shown. If there is no mode, it is shown as missing.

The Area Eligibility waiver was used by 42 State agencies for CACFP.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of sponsors 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 institutions that provided the "other" method specified.

**Exhibit D.18. State agency reported approximate proportion of sponsors with the Area Eligibility waiver that selected new SFSP meal sites to serve children who were previously or newly eligible for benefits using certain methods, during SY 2021–2022 or summer 2022**

Method	Median	Mode	Don't Know <sup>a</sup>
No methods used- all sites approved as area eligible	0	0	9
Analyzed unemployment data	0	0	10
Analyzed prior year school meals eligibility data	1	0	7
Identified site(s) that were area eligible in prior years	2	3	8
Targeted near-eligible sites, such as sites where 40% of children were eligible for free or reduced-price meals	2	0-3	9
Other <sup>b</sup>			
Aligned meal sites with summer programming	3		0
Contractors identified new sites	1		0
Partnered with community libraries	1		0
Reviewed Capacity Builder Map data from USDA	3		0
Reviewed food security data	1		0
Did not use any methods to target new meal sites	0	0	10

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: State agencies reported the proportion of sponsors on a 5-point scale: that included none (0), less than half (1), about half (2), more than half (3), and all (4).

The median reflects the middle value in the distribution when all State agency responses are arranged on that scale, with half of the State agencies' responses falling on each side of the median. If the analysis includes an even number of responses, the median is identified as the midpoint between the two middle values. Because these are categorical response options, if the median is identified as a half, such as 2.5, it is rounded up to the whole number.

The mode reflects the proportion of sponsors most frequently reported by State agencies. If State agencies reported multiple proportions with the greatest frequency, each proportion is shown. If there is no mode, it is shown as missing.

The Area Eligibility waiver was used by 34 State agencies for SFSP.

<sup>a</sup> The number of State agencies that reported they did not know the proportion of sponsors 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 sponsors that provided the "other" method specified.

**Exhibit D.19. Total number and percentage of State agencies that used each State agency monitoring waiver from March through September 2020**

Waiver	Number of State Agencies	Percent of State agencies
CACFP Onsite Monitoring for State agencies	53	96
School Meals Onsite Monitoring - Revised	56	100
SFSP Onsite Monitoring for State agencies	53	98
CACFP Annual Review Requirements for State agencies	53	96

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 CACFP.

**Exhibit D.20. Total number and percentage of State agencies that used each State agency monitoring waiver extension in SY 2020–2021 or summer 2021**

Waiver	Number of State agencies	Percent of State agencies
CACFP Onsite Monitoring for State Agencies	50	91
School Meals Onsite Monitoring - State Agencies	52	93
SFSP Onsite Monitoring for State Agencies	51	94

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Each waiver applies to specific Child Nutrition Programs, noted in the name of the waiver. During SY 2020–2021 and summer 2021, 56 State agencies administered NSLP and SBP; 54 administered SSO; 54 administered SFSP; and 55 administered CACFP.



**Exhibit D.21. Total number of State agencies in which local program operators used each monitoring waiver extension in SY 2020–2021 or summer 2021**

Waiver	Number of State agencies
CACFP Onsite Monitoring for Sponsors	54
School Meals Onsite Monitoring - SFAs	51
SFSP Onsite Monitoring for Sponsoring Orgs	50
SFSP First Week Site Visits (SY 2020–2021)	50
SFSP First Week Site Visits (July 1-Sept. 30, 2021)	48

Source: School Meals Operations Study, Option Period 1 COVID-19 State agency Survey.

Note: Each waiver applies to specific Child Nutrition Programs, noted in the name of the waiver. By program, 56 State agencies administered NSLP and SBP; 54 administered SSO; 54 administered SFSP; and 55 administered CACFP. Percentages were calculated by dividing the number of State agencies that used each waiver in the program during SY 2020–2021 or summer 2021 by the total number of State agencies that administered the program.

**Exhibit D.22. Percentage of State agencies that conducted certain types of monitoring following implementation of State agency monitoring waivers during SY 2021–2022, by waiver**

Types of monitoring	School Meals Onsite Monitoring	CACFP Onsite Monitoring for State Agencies	SFSP Half Aggregate Monitoring for State Agencies and Sponsors
Desk audit- paperwork review	70	78	54
Desk audit- interviews with site operators	70	78	52
Virtual observations through live stream video	44	60	28
Virtual observations conducted through review of site photos	56	50	33
Onsite socially distanced observations	52	70	67
<b>Other<sup>a</sup></b>			
Provided onsite or virtual technical assistance	7	4	0
Regular onsite monitoring	6	4	15
No monitoring conducted	7	2	9

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

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.

The School Meals Onsite Monitoring waiver was used by 54 State agencies. The CACFP Onsite Monitoring for State Agencies waiver was used by 50 State agencies. SFSP Half Aggregate Monitoring for State Agencies and Sponsors waiver was used by 46 State agencies.

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

**Exhibit D.23. Percentage of State agencies that conducted certain types of monitoring after receiving each monitoring waiver during SY 2020–2021 or summer 2021**

Type of monitoring	CACFP Onsite Monitoring for State Agencies	School Meals Onsite Monitoring – State agencies	SFSP Onsite Monitoring for State Agencies
<b>Number of State agencies that used the waiver</b>	<b>50</b>	<b>52</b>	<b>51</b>
Desk audit – paperwork review	94	81	96
Desk audit- interviews with local program operators	90	83	96
Virtual observations conducted through live stream video	74	54	55
Virtual observations through review of site photos	76	63	65
Onsite socially distanced observations	56	38	67
<b>Other type of monitoring</b>			
Conducted pre-approval site visit	2	n.a.	2
Monitoring postponed or waived	2	6	2
Provided technical assistance	2	4	4
Single audits	n.a.	4	n.a.

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the total number of State agencies reporting each monitoring type by the number of State agencies that used the waiver in SY 2020–2021 or summer 2021.

**Exhibit D.24. 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 for State Agencies	School Meals Onsite Monitoring – Revised	SFSP Onsite Monitoring for State agencies	CACFP Annual Review Requirements for 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
Onsite while assisting with or observing meal service	17	16	23	17
Other	4	9	7	4
No monitoring conducted	8	11	0	13
<b>Number of State agencies that used waiver</b>	<b>53</b>	<b>56</b>	<b>53</b>	<b>53</b>

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

**Exhibit D.25. Average percentage of State agencies reporting that local program operators conducted certain types of monitoring following implementation of local program operator onsite monitoring waivers SY 2021–2022 <sup>a</sup>**

Type of monitoring	(0) No LPOs	(1) Less than half	(2) About half	(3) More than half	(4) All LPOs	Don't know
Desk audit – paperwork review	5	18	6	36	18	17
Desk audit- interviews with local program operators	3	20	7	36	14	19
Virtual observations conducted through live stream video	14	26	13	17	3	27
Virtual observations through review of site photos	10	27	9	16	6	32
Onsite socially distanced observations	13	16	14	27	3	27
<b>Other type of monitoring<sup>b</sup></b>						
Onsite and offsite monitoring	0	3	0	0	0	0
Virtual observations through video recordings	0	2	0	0	0	0
No monitoring conducted	75	3	0	0	0	22

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Average percentages were calculated by dividing the total number of State agencies that reported each proportion of local program operators across each Child Nutrition Program by the total number of State agencies that used the waivers for the Child Nutrition Programs.

<sup>a</sup> This includes types of monitoring conducted by local program operators that used either or both onsite monitoring waivers available during SY 2021–2022 —the School Meals Onsite Monitoring waiver and CACFP Onsite Monitoring for Sponsors waiver.

<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 used the “other” method specified.

**Exhibit D.26. Percentage of State agencies reporting that local program operators conducted certain types of monitoring after receiving each onsite monitoring waiver during SY 2020–2021 or summer 2021**

Type of monitoring	CACFP Onsite Monitoring for Sponsors	School Meals Onsite Monitoring – SFAs	SFSP Onsite Monitoring <sup>a</sup>	SFSP First Week Site Visits <sup>b</sup>
<b>Number of State agencies that used the waiver</b>	<b>54</b>	<b>52</b>	<b>50</b>	<b>50</b>
Desk audit – paperwork review	93	82	90	83
Desk audit- interviews with local program operators	89	76	82	77
Virtual observations conducted through live stream video	85	47	60	46
Virtual observations through review of site photos	70	45	60	48
Onsite socially distanced observations	76	80	88	77
<b>Other type of monitoring</b>				
Monitoring postponed or waived	2	n.a.	2	n.a.
Reviewed site video recordings	2	n.a.	n.a.	n.a.

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies reporting local program operators used each monitoring type by the number of State agencies that used the waiver during SY 2020–2021 or summer 2021.

<sup>a</sup> This includes types of monitoring conducted by local program operators that used either or both SFSP onsite monitoring waivers available during SY 2020–2021—the SFSP Onsite Monitoring for Sponsoring Organizations waiver and the SFSP First Week Site Visits waiver.

<sup>b</sup> This includes types of monitoring conducted by local program operators that used the SFSP First Week Site Visits waiver extension for July 1, 2021, through September 30, 2021.

**Exhibit D.27. Proportion of local program operators most commonly reported by State agencies that conducted certain types of monitoring following implementation of local program operator onsite monitoring waivers from March through September 2020, by waiver**

Types of monitoring	CACFP Monitoring for Sponsors		School Meals Onsite Monitoring - Revised		SFSP Onsite Monitoring Sponsors		SFSP First Week Site Visits	
	Proportion of institutions providing CACFP most commonly reported by State agencies	Don't Know <sup>a</sup>	Proportion of SFAs providing NSLP and SBP 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 sponsors providing SFSP most commonly reported by State agencies	Don't Know <sup>a</sup>
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
Onsite 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.

**Exhibit D.28. Percentage of State agencies reporting that administration-focused waivers improved services to children in certain ways during SY 2021–2022, by waiver**

Improved services to children	School Meals Onsite Monitoring	CACFP Onsite Monitoring for State Agencies	Administrative Reviews for SSO Operators	SFSP Half Aggregate Monitoring for State Agencies and Sponsors	Fiscal Action Flexibility for Meal Pattern Violations	Child Nutrition Program Reporting Requirements
Increased State agency administrative resources for approving meal sites	37	54	40	54	23	51
Increased State and local administrative resources for identifying meal sites	26	44	31	43	19	39
Increased State agency ability to focus administrative resources on other priority areas to improve services to children	76	80	79	70	56	88
Increased State agency ability to provide technical assistance to local program operators	80	82	81	70	71	90
Increased local program operators' administrative resources for providing meals to children	67	64	63	59	67	69
Increased local program operators' financial resources for providing meals to children	n.a.	n.a.	n.a.	n.a.	71	n.a.
Increased local program operators' ability to focus administrative resources on other priority areas to improve services to children	70	70	67	65	58	80
<b>Other<sup>a</sup></b>						
Protected health of staff and children	7	14	8	7	2	0

Source: School Meals Operations Study, Option Period 2 COVID-19 State agency Survey.

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 during SY 2021–2022 for the relevant Child Nutrition Program(s) by the total number of State agencies that used each administration-focused waiver.

The School Meals Onsite Monitoring waiver was used by 54 State agencies. The CACFP Onsite Monitoring for State Agencies waiver was used by 50 State agencies. The Administrative Reviews for SSO Operators waiver was used by 48 State agencies. The SFSP Half Aggregate Monitoring for State Agencies and Sponsors waiver was used by 46 State agencies. The Fiscal Action Flexibility for Meal Pattern Violations waiver was used by 52 State agencies. The Child Nutrition Program Reporting Requirements waiver was used by 51 State agencies.

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



**Exhibit D.29. Percentage of State agencies reporting that local program operator administration-focused waivers improved NSLP services to children in certain ways during SY 2021–2022, by waiver**

Improved services to children	School Meals Onsite Monitoring	School Wellness Policy Assessments
<b>Number of State agencies that used waiver</b>	<b>37</b>	<b>36</b>
Increased administrative resources for identifying meal sites	38	22
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	62	50
Increased financial resources for providing meals	35	19
Increased administrative resources for providing meals	57	53
Increased ability to focus administrative resources on other priority areas to improve services to children	84	94
Increased ability of local program operators to begin operations more quickly	32	22
Other <sup>a</sup>		
Increased ability to focus on meal production	3	n.a.
Don't know how this waiver improved services to children	11	6
This waiver did not improve services to children	5	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement during SY 2021–2022 by the total number of State agencies that used each local program operator administration-focused waiver.

<sup>a</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the waiver in the program.

**Exhibit D.30. Percentage of State agencies reporting that local program operator administration-focused waivers improved SBP services to children in certain ways during SY 2021–2022, by waiver**

Improved services to children	School Meals Onsite Monitoring	School Wellness Policy Assessments
<b>Number of State agencies that used waiver</b>	<b>36</b>	<b>34</b>
Increased administrative resources for identifying meal sites	36	24
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	61	50
Increased financial resources for providing meals	33	21
Increased administrative resources for providing meals	56	56
Increased ability to focus administrative resources on other priority areas to improve services to children	83	94
Increased ability of local program operators to begin operations more quickly	33	24
Other <sup>a</sup>		
Increased ability to focus on meal production	3	n.a.
Don't know how this waiver improved services to children	11	6
This waiver did not improve services to children	6	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement during SY 2021–2022 by the total number of State agencies that used each local program operator administration-focused waiver.

<sup>a</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the waiver in the program.

**Exhibit D.31. Percentage of State agencies reporting that local program operator administration-focused waivers improved CACFP services to children in certain ways during SY 2021–2022, by waiver**

Improved services to children	CACFP Onsite Monitoring for Sponsors
<b>Number of State agencies that used waiver</b>	<b>51</b>
Increased administrative resources for identifying meal sites	45
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	59
Increased financial resources for providing meals	37
Increased administrative resources for providing meals	59
Increased ability to focus administrative resources on other priority areas to improve services to children	80
Increased ability of local program operators to begin operations more quickly	53
<b>Other<sup>a</sup></b>	
Allowed daycare homes to safely stay open	2
Improved children’s safety	6
Improved program staff’s safety	2
Don’t know how this waiver improved services to children	10
This waiver did not improve services to children	4

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement during SY 2021–2022 by the total number of State agencies that used each local program operator administration-focused waiver.

<sup>a</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. Percentages were calculated by dividing the number of State agencies that reported each response by the total number of State agencies that used the waiver in the program.

**Exhibit D.32. Percentage of State agencies reporting that the Child Nutrition Program Reporting Requirements waiver was used for all SFAs during SY 2021–2022**

	Percentage
Percentage of State agencies	86

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported 100% of SFAs used the waiver during SY 2021–2022 by the total number of State agencies that used the waiver. Fifty-one State agencies used the Child Nutrition Program Reporting Requirements waiver during SY 2021–2022.

**Exhibit D.33. Percentage of State agencies reporting that the Child Nutrition Programs Reporting Requirements waiver was used for SFAs**

Characteristic	Percentage of State agencies
Reporting requirements waived for all SFAs	87
Reporting requirements waived for public and non-public institutions	2
Reporting requirements waived on case-by-case basis	4
Reporting requirements waived for no SFAs	6

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: State agencies reporting that less than 100% of SFAs used the waiver responded to this survey question. Characteristics listed were derived from State agencies’ open-ended responses. Percentages were calculated by dividing the number of State agencies that reported each SFA characteristic by the total number of State agencies that used the waiver nationwide. Fifty-four State agencies used the Child Nutrition Programs Reporting Requirements waiver in SY 2020–2021.

**Exhibit D.34. Percentage of State agencies nationwide reporting that the Child Nutrition Program Reporting Requirements waiver was used for SFAs with certain characteristics**

Characteristic	Percentage of State agencies
SFAs were still required to report on Food Safety Inspections	4
Requirements were not waived for SFAs	6
SFAs were still required to complete reporting	6
SFAs were required to complete the FNS-742	2
SFAs were still required to do verification and independent review reporting	2
SFAs were still required to report on paid prices in annual NSLP site applications	2

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: State agencies reporting that less than 100% of SFAs used the waiver responded to this survey question. Characteristics listed were derived from State agencies’ open-ended responses. Percentages were calculated by dividing the number of State agencies that reported each SFA characteristic by the total number of State agencies that used the waiver nationwide. Fifty-one State agencies used the Child Nutrition Program Reporting Requirements waiver during SY 2021–2022.

**Exhibit D.35. Percentage of State agencies that used the Child Nutrition Programs Reporting Requirements waiver for each applicable report during SY 2021–2022**

Report	Percentage of State agencies
FNS-640 Administrative Review Report Form	96
FNS-828 Paid Lunch Price Report	94
FNS-874 Second (Independent) Review of Applications	94
Ameliorative Action Report	92
State Agency Food Safety Inspections Report	80
Performance-Based Reimbursement (7 Cents) Quarterly Report	84

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that used the waiver for each report by the total number of State agencies that used the waiver during SY 2021–2022. Fifty-one State agencies used the Child Nutrition Programs Reporting Requirements waiver during SY 2021–2022.

**Exhibit D.36. Percentage of State agencies that used the Child Nutrition Programs Reporting Requirements waiver for each applicable report in SY 2020–2021**

Report	Percentage of State agencies
FNS-10 Report of School Program Operations – Part B (October Annual Reporting)	52
FNS-640 Administrative Review Report Form	83
FNS-828 Paid Lunch Price Report	87
FNS-834 State Agency (NSLP/SNAP) Direct Certification Rate Data Element Report	63
FNS-874 Second (Independent) Review of Applications	83
Ameliorative Action Report	83
State Agency Food Safety Inspections Report	81
Performance-Based Reimbursement (7 Cents) Quarterly Report	72

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that used the waiver for each report by the total number of State agencies that used the waiver in SY 2020–2021. Fifty-four State agencies used the Child Nutrition Programs Reporting Requirements waiver in SY 2020–2021.



**Exhibit D.37. Percentage of State agencies reporting that local program operator administration-focused waivers improved SSO services to children in certain ways during SY 2021–2022 or summer 2022, by waiver**

Improved services to children	SFSP Reimbursement for SSO	SSO/SFSP Area Eligibility for Closed Enrolled Sites
<b>Number of State agencies that used waiver</b>	<b>53</b>	<b>28</b>
Increased administrative resources for identifying meal sites	40	50
Increased administrative resources for addressing food supply issues and other challenges in preparing meals	79	57
Increased financial resources for providing meals	100	50
Increased administrative resources for providing meals	72	75
Increased ability to focus administrative resources on other priority areas to improve services to children	62	82
Increased ability of local program operators to begin operations more quickly	43	61
<b>Other<sup>a</sup></b>		
Increased financial resources for family outreach	2	n.a.
Don't know how this waiver improved services to children	0	7
This waiver did not improve services to children	0	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each improvement during SY 2021–2022 or summer 2022 by the total number of State agencies that used each local program operator administration-focused waiver.

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

**Exhibit D.38. Percentage of State agencies that waived fiscal action requirements for certain types of meal pattern violations under the Fiscal Action Flexibility for Meal Pattern Violations waiver during SY 2021–2022**

Meal pattern violations	Percentage of State agencies
Missing food components	73
Repeated violations involving vegetable subgroups	58
Repeated violations involving milk type	46
Missing production records	25
<b>Other<sup>a</sup></b>	
Missing weekly subgroups, but meeting vegetable requirements	2
Repeat violations involving quantities or portions	8

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each meal pattern violation type by the total number of State agencies that used the waiver during SY 2021–2022. Fifty-one State agencies used the Fiscal Action Flexibility for Meal Pattern Violations waiver during SY 2021–2022.

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

**Exhibit D.39. Percentage of State agencies reporting that the Fiscal Action Flexibility for Meal Pattern Violations waiver was used for all affected SFAs during SY 2021–2022**

	Percentage
Percentage of State agencies	88

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported 100% of SFAs used the waiver during SY 2021–2022 by the total number of State agencies that used the waiver. Fifty-two State agencies used the Fiscal Action Flexibility for Meal Pattern Violations waiver during SY 2021–2022.

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## **Appendix E.**

### **Supplemental Exhibits Related to Chapter IV**

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**Exhibit E.1. Percentage of State agencies that experienced financial or operational challenges administering Child Nutrition Programs, or challenges implementing or using the COVID-19 waivers, during SY 2021–2022**

Type of challenges	Percentage
Financial	35
Operational	94
Implementing or using waivers	75

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies reporting each type of challenges by 68 total State agency respondents.

**Exhibit E.2. Percentage of State agencies that experienced financial or operational challenges administering Child Nutrition Programs, or challenges implementing or using the COVID-19 waivers, during SY 2020–2021 or summer 2021**

Type of challenges	Percentage	Percentage missing
Financial	27	1
Operational	93	0
Implementing or using waivers	69	1

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Notes: Percentages were calculated by dividing the number of State agencies reporting each type of challenges by 67 total State agency respondents. Percentage missing calculated by dividing the number of State agencies that did not answer the question by 67 total State agency respondents.



**Exhibit E.3. 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.

**Exhibit E.4. Percentage of State agencies reporting certain factors contributed to operational challenges administering Child Nutrition Programs during SY 2021–2022, by Program**

Factors contributing to operational challenges	NSLP	SBP	SSO	SFSP	CACFP
Resources needed to manage multiple Child Nutrition Programs simultaneously (for example, school meals and summer meals)	59	55	65	49	40
Resources needed to review and approve waiver requests from providers	54	50	69	55	58
Resources needed to approve meal sites	32	30	44	38	36
Resources needed to assist providers with identification of meal sites	29	29	39	38	31
Resources needed to provide technical assistance to local program operators	55	54	72	53	56
Resources needed to administer USDA Foods	36	25	33	21	16
Managing staffing shortages (for example, due to illness or other reasons)	43	41	52	43	55
Limitations on ability to hire new staff	30	30	35	32	33
Unexpected staff training needs	52	50	63	47	49
Redesigning monitoring approaches (for example, from onsite to virtual)	54	54	65	49	58
Implementing IT system changes	66	63	74	62	51
Office closures	23	21	26	21	22
Unclear guidance from FNS	64	63	69	58	56
Untimely guidance from FNS	77	75	85	77	67
Insufficient technical assistance from FNS	50	46	56	43	45
Other	13	11	9	9	9
No operational challenges with program administration	0	0	2	6	4
Missing	0	2	0	2	2

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies reporting each factor per program by the total number of State agencies who oversee each program. Percentage missing calculated by dividing the number of State agencies that did not answer the question per program by the total number of State agencies who oversee each program.

**Exhibit E.5. Percentage of State agencies reporting certain factors contributed to operational challenges administering Child Nutrition Programs during SY 2020-2021 or summer 2021, by Program**

Factors contributing to operational challenges	NSLP	SBP	SSO	SFSP	CACFP
Untimely guidance from FNS	85	83	78	84	74
Unclear guidance from FNS	72	72	73	82	76
Redesigning monitoring approaches (for example, from onsite to virtual)	68	68	67	76	70
Implementing IT system changes	68	68	71	76	64
Resources needed to manage multiple Child Nutrition Programs simultaneously (for example, school meals and summer meals)	62	62	61	64	54
Resources needed to provide technical assistance to local program operators	58	57	59	64	56
Resources needed to review and approve waiver requests from providers	53	53	55	60	58
Unexpected staff training needs	47	47	49	50	42
Insufficient technical assistance from FNS	42	40	37	44	48
Office closures	40	40	41	42	44
Resources needed to approve meal sites	32	32	39	42	30
Managing staffing shortages (for example, due to illness or other reasons)	34	34	31	38	42
Limitations on ability to hire new staff	34	34	33	38	42
Resources needed to assist providers with identification of meal sites	13	13	22	34	22
Resources needed to administer USDA Foods	30	25	22	18	12
No operational challenges with program administration	6	6	10	2	2

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

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

**Exhibit E.6. Percentage of State agencies reporting certain factors contributed to operational challenges administering Child Nutrition Programs from March through September 2020, by Program**

Factors contributing to operational challenges	NSLP	SBP	SSO	SFSP	CACFP
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.

**Exhibit E.7. Percentage of State agencies reporting certain factors contributed to financial challenges administering Child Nutrition Programs during SY 2021–2022, by Program**

Factors contributing to financial challenges	NSLP	SBP	SSO	SFSP	CACFP
Added new staff	7	7	7	9	4
Increased staff hours	16	14	19	25	18
Staff overtime	7	7	6	9	7
Insufficient State administrative expense funds (SAE) or State administrative funds (SAF)	18	18	20	23	22
Rules regarding use of State administrative expense funds (SAE) or State administrative funds (SAF)	16	14	15	19	13
IT system changes	27	27	30	32	20
Other	9	9	11	13	11
No financial challenges with program administration	0	0	0	0	0
Missing	0	0	0	0	0

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies reporting each factor per program by the total number of State agencies who oversee each program. Percentage missing calculated by dividing the number of State agencies that did not answer the question per program by the total number of State agencies who oversee each program.

**Exhibit E.8. Percentage of State agencies reporting certain factors contributed to financial challenges administering Child Nutrition Programs during SY 2020-2021 or summer 2021, by program**

Factors contributing to financial challenges	NSLP	SBP	SSO	SFSP	CACFP
IT system changes	65	65	63	59	44
Increased staff hours	35	35	38	35	31
Rules regarding use of State administrative expense funds (SAE) or State administrative funds (SAF)	35		38	35	19
Insufficient State administrative expense funds (SAE) or State administrative funds (SAF)	29	29	31	18	19
Added new staff	18	18	19	24	19
Staff overtime	12	12	13	18	13
No financial challenges with program administration	24	29	19	18	31

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies reporting each factor per program by the total number of State agencies who oversee each program. Percentage missing calculated by dividing the number of State agencies that did not answer the question per program by the total number of State agencies who oversee each program.

**Exhibit E.9. Percentage of State agencies reporting certain factors contributed to financial challenges administering Child Nutrition Programs from March through September 2020, by program**

Factors contributing to financial challenges	NSLP	SBP	SSO	SFSP	CACFP
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

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.

**Exhibit E.10. Percentage of State agencies that were unable to overcome certain challenges with implementing or using COVID-19 Child Nutrition waivers during SY 2021–2022**

Challenge	Percentage of State agencies
Delayed or slow guidance from FNS	47
Delayed or slow waiver release by FNS	41
Unclear guidance from FNS	38
Staff burden associated with implementing waivers	32
Staff burden associated with using waivers	18
Staff resources needed to collect waiver data	24
Difficulties ensuring program integrity during waiver use	29
Other <sup>a</sup>	6
Implementing IT system changes	1
Insufficient funding for implementing changes	1
Waivers related to monitoring did not alleviate burden on State agencies	1
None, agency able to overcome all challenges	15

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: 75 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. Percentages were calculated by dividing the number of State agencies that reported each challenge that could not be overcome by 68 total State agency respondents. Some State agencies reported that they were able to overcome all challenges. These responses are captured in the last row of this table.

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



**Exhibit E.11. Percentage of State agencies that were unable to overcome certain challenges with implementing or using COVID-19 Child Nutrition waivers during SY 2020-2021 or summer 2021**

Challenge	Percentage of State agencies
Untimely guidance from FNS	10
Staffing issue	6
Implementing IT system changes	4
Reporting requirements were not clear	3
Unclear guidance from FNS	3
LPO misinterpretation of waiver requirements	1
Monitoring local program operators	1
None: State agencies were able to overcome all challenges	43
None: No challenges reported implementing or using COVID-19 Child Nutrition waivers	31

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: 69 percent of State agencies had challenges implementing or using COVID-19 Child Nutrition nationwide 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 exhibit.

**Exhibit E.12. Percentage of State agencies that were unable to overcome certain challenges with implementing or using COVID-19 Child Nutrition nationwide waivers from March through September 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: 67 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.

**Exhibit E.13. Percentage of State agencies reporting certain factors assisted efforts to overcome challenges implementing or using COVID-19 Child Nutrition waivers during SY 2021–2022**

Factor	Percentage of State agencies
Timely technical assistance from FNS Regional Office	35
Comprehensive technical assistance from FNS Regional Office	31
Timely guidance and clarification from FNS National Office	28
Comprehensive guidance and clarification from FNS National Office	34
Collaboration with local program operators	46
Collaboration with suppliers or food vendors	16
Collaboration with other State agencies	46
<b>Other<sup>a</sup></b>	
Collaboration among staff within state	1
Collaboration with FNS Regional Office	3
Collaboration with information technology vendors	1
Collaboration with partners	1
Experience from prior years of waiver implementation	1
Staff time to review waivers	1

Source: School Meals Operations Study, State Agency Child Nutrition Director COVID-19 Waiver Collection School Year 2021–2022.

Note: Percentages were calculated by dividing the number of State agencies that reported each factor by 68 total State agency respondents.

<sup>a</sup> “Other” responses were derived from State agencies’ open-ended responses. Responses that did not directly address the question were not coded. For example, some State agencies provided information on why they were unable to overcome the challenges.

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