



**PROJECT
BREAD**

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The Impact of COVID-19 Emergency Flexibilities and Waivers on Child Nutrition Programs in Massachusetts



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**Congressional
Hunger Center**

Administered through the Congressional Hunger Center, the Emerson National Hunger Fellows Program is a social justice program that trains, inspires, and sustains leaders. Fellows gain field experience fighting hunger and poverty through placements in community-based organizations across the country, and policy experience through placements in Washington, D.C. The program bridges community-based efforts and national public policy, and fellows develop as effective leaders in the movement to end hunger and poverty. The Emerson Program supports a diversity of local and national approaches to eliminate hunger, poverty and social inequality, particularly racism. We seek to craft successful and mutually beneficial partnerships between Fellows and partner organizations while developing a new generation of hunger and poverty leaders. Fellows support partner organizations with program development, research, evaluation, outreach, organizing, and advocacy projects.



Project Bread's Child Nutrition Outreach Program (CNOP) works to increase participation in two underutilized federal child nutrition programs, the National School Breakfast Program and the Summer Food Service Program (known as Summer Eats in Massachusetts). For over 20 years, they have worked directly with school districts, SFSP sponsors, and communities to provide technical assistance and innovative solutions to ensure these programs make the most impact on the children who need them. The program strives to ensure that all children in Massachusetts have access to nutritious meals, both in school and during the summer months. CNOP is funded by the Massachusetts Department of Elementary and Secondary Education and administered by Project Bread.



**PROJECT
BREAD**

As the largest and most far-reaching anti-hunger organization in the state, Project Bread connects people and communities in Massachusetts to reliable sources of food while advocating for policies that make food more accessible—so that no one goes hungry. Through their resources, programming and advocacy Project Bread works to foster pathways to permanently solve hunger in the state of Massachusetts.



INTRODUCTION

Since its onset in March, the novel coronavirus (COVID-19) pandemic has brought unprecedented challenges to schools across the United States. In accordance with social distancing orders, the pandemic forced most schools to transition to remote learning, drastically changing the lives of children and their parents overnight. As parents faced the difficult and costly choice of whether or not to continue to work while their children learned remotely from home, children faced serious losses on academic, social and health fronts (Masonbrink & Hurley, 2020). While the measure of closing schools was necessary for maintaining public health protocols, it has severely impacted access to critical resources for students and their families, especially food resources. In the United States, the federally funded National School



Figure 1: Hoosac Valley staff pose in front of bus used for meal delivery

Lunch Program (NSLP) operates in close to 95,000 schools and residential childcare institutions providing low-cost or free lunches to more than 26 million children each school day (Mass DESE, 2019). As a result of the closures, many children lost access to these important meals and schools thus became tasked with balancing the prevention of disease transmission while still ensuring food access remotely.

The United States Department of Agriculture (USDA) responded to the emergency food crisis by issuing a series of waivers and flexibilities that loosened the normally strict rules that dictate when, where and how school meals can be served. As a result of the flexibilities, school districts were able to innovate and adapt new ways to provide nutritious meals to students that depend on them, while also rising to meet the millions of families across the country who are experiencing food insecurity for the first time (No Kid Hungry, 2020). Through waiving congregate feeding requirements, meal time requirements, the area eligibility requirement, and allowing for the operation of Summer Meal Programs, nearly every school district was able to hand out meals at no-cost to students and their families. Effectively, the USDA has assisted states in establishing the country's first ever Universal Free School Meal program that now extends through the 2020-2021 school year (USDA, 2020).



This move by the USDA came thanks to the advocacy work and voice of hundreds of organizations, state governments and legislators, universities and parent advocates, responding to the serious economic challenges faced by individuals and families. Offering universal meals across the country is an unprecedented step in ensuring food access, during the pandemic and beyond. The provisioning of universal school meals as a part of education has long been the goal of many anti-hunger organizations and advocates, including Project Bread in Massachusetts. While the measures enacted by the USDA were a necessary, direct response to maintaining safety and food access during the COVID-19 crisis, advocates argue that the level of need during the crisis merits a more robust and immediate investment in the federal nutrition programs (Bauer, 2020).

With these unprecedented changes in meal programs, this year has provided the opportunity for innovation in both school and summer meals (Kinsey et al., 2020). The COVID-19 pandemic serves as an important window to understand challenges faced by federally-funded child nutrition programs during out of school times (OST) and envision ways forward to ensure equitable access to meals for children who need them. It is important to look at exactly how the waivers and flexibilities instated by the USDA's Food and Nutrition Services (FNS) have changed the ways schools and sponsors serve meals and what those changes might mean for the future of these programs. In this report we highlight these changes along with challenges and opportunities created by the flexibilities and waivers with the goal of informing school nutrition policy for other out of school times (OST) and addressing areas for future improvements.

Project Goals and Questions

In this report we present the following:

- (1) The federal and Massachusetts state landscape of child nutrition programs pre and post COVID-19
 - (2) The impacts of the USDA-instated nationwide flexibility and waivers on child nutrition programs in Massachusetts
 - (3) How the COVID-19 emergency response became a catalyst for structures that promote greater accessibility, equity and reach
 - (4) Future directions for supporting meal programs when schools are out of session through the Summer Food Service Program
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Methods

The findings in this report are informed by secondary and primary sources. Prior to undertaking this project, relevant literature on child nutrition, summer nutrition programs and childhood food insecurity was reviewed and summarized. Given the unprecedented nature of the pandemic and the rapid execution of out of school emergency meal programs, research on the impact of waivers is limited. Therefore, in addition to academic literature, an array of news articles, policy briefs and reports were also consulted.

Districts and school meal sponsors were identified through Project Bread's Child Nutrition Outreach Program (CNOP), which works with school and summer meal providers across Massachusetts. Seventeen half hour to hour-long interviews were conducted with twelve school nutrition directors (SNDs) and five directors or assistant directors of community based organizations such as YMCAs and Boys & Girls Clubs. Prior to the interviews, relevant information was gathered about district/sponsor including: free and reduced percentages, average participation percentages from the School Breakfast Program and National School Lunch Program from 2017-2019 and average meals served in the years 2017-2019. In addition to consulting Project Bread's 'Find a Meal' map, district/ sponsor websites and social media accounts were reviewed to determine the meal delivery model (bus routes, delivery, parent pick up, etc.) frequency of meals served, number of meals served per day and location. The diverse sample consisted of variably sized districts, one regional district and one technical school. Some of the districts had longstanding and robust summer programs, while some served in the summer for the very first time in 2020. This report also relied on data provided through the Department of Elementary and Secondary Education to compare 2019 to 2020 in number of meals served and number of districts/sponsors that provided meals.

Background

The economic downturn caused by the pandemic has already led to devastating consequences for millions of families and will continue to exert lasting damages disproportionately felt by low-income communities and communities of color. The widespread loss of employment or significant decreases in income have put millions more households at increased risk of experiencing food insecurity, a household-level socio-economic condition wherein at a given time during the year, one or more family members are unable to acquire food because of lack of money or other resources (Feeding America, 2020; USDA, 2019).

According to one estimate by Northwestern, during the height of the pandemic food insecurity more than doubled as a result of the economic crisis. The 23% of estimated families experiencing food insecurity was significantly heightened as compared to the national average that usually hovers around 10% (Schanzenbach & Pitts, 2020).



That number is even higher among families with children. An analysis conducted by the Brookings Institute this summer found that in late June, 27.5% of households with children were food insecure. This means that close to 14 million children lived in a household characterized by child food insecurity. The estimated 14 million children who went hungry this summer was nearly a fourfold increase from the 2.5 million children who were considered food insecure pre-pandemic (Bauer, 2020). It is well researched and understood that hunger and its accompanying negative physical and mental health outcomes are disproportionately felt by low-income communities and communities of color.

The pandemic has exacerbated these serious disparities along racial/ethnic and socioeconomic lines with low-income Americans and Black and Hispanic Americans and low-income families with children. According to a national survey conducted in March 2020 among adults with incomes less than 250% of the 2020 federal poverty level, 44% of all households were food insecure including 48% of Black households, 52% of Hispanic households, with 54% of total households having children (Schanzenbach & Pitts, 2020).

On top of being stressful, food insecurity among children has been proven to damage children's health, cognitive and social development having drastic implications for future success in school and the workforce (Dunn et al., 2020). Put simply, children cannot learn when they are hungry. Our efforts to prepare children for a successful future are undercut when children are too hungry to learn and cycles of food insecurity and poverty persist. Providing children with nutrient-dense food today is essential in ensuring we have a healthy, prosperous society tomorrow.

The USDA's federal child nutrition programs are the first line of defense when it comes to ending childhood hunger. The pandemic made clear just how important these programs are to children and their families experiencing chronic food insecurity and have now become vital to those experiencing food insecurity for the first time.

The rapid rise in food insecurity combined with mandatory school closures and increased health risks necessitated widespread flexibility in the way federal child nutrition programs operate. The vast majority of districts are continued to provide food to families through school meal programs, but in brand new ways. In March 2020, Congress authorized the USDA to issue various forms of support through the Families First Coronavirus Response Act of 2020 to ensure children and low-income Americans maintain access to food. These nationwide waivers allowed states to serve free meals to all children, provide supplemental food assistance through P-EBT (pandemic EBT), increase SNAP benefits, and provided billions of dollars in food through food banks and food pantries. As a result of these flexibilities, we are seeing the most progressive and robust school meal programs in our nation's history. The waivers and flexibility allowed districts and sponsors to:



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- Operate under the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO), the two meal programs normally utilized in the summer, to serve all children for free
 - Waive the area eligibility requirement which mandates only districts/areas/programs with 50% or more students receiving free/reduced lunch can serve in the summer through SFSP/SSO
 - Deviate from meal pattern nutrition requirements in case of supply chain, storage or packaging issues
 - Distribute through grab-and-go models or distribute meals through home delivery or bus routes
 - Allow parents to pick up meals without children present
 - Extend the deadline for various reporting requirements to ease the administrative burden on schools
 - Waive congregate feeding requirement that stipulates in order to receive federal reimbursement for a meal that meal must be consumed in a congregate setting
 - Deliver meals outside of standard meals times and distribute multiple meals at one time, and multiple days worth of meals at once, including weekend meals

Out of all of these flexibilities, it is important to highlight the waiver of the “area eligibility” requirement, which allowed districts to serve meals at any location, not just where poverty is most concentrated. Under normal circumstances, SFSP can only operate sites where at least 50% of children qualify for free or reduced lunch as determined by school, census, or enrolled program data. During the school year, children can only qualify for free or reduced meals if they meet the income eligibility guidelines. Families must fall under the 185% of the poverty line to qualify for reduced meals, or 130% of the poverty line to qualify for free meals. Due to the pandemic, many families experienced fluctuations in their income from the job loss or reduction of hours. This made the existing eligibility data less accurate and necessitated the flexibility measures that were enacted. Taken together, these waivers and flexibilities have allowed schools across the country to serve free universal meals, providing a lifeline to food insecure families (SNA, 2020).



Federal Child Nutrition Programs in Massachusetts

To understand the importance of the changes the waivers had, it is necessary to understand the operational structure, regulatory requirements and reimbursement mechanisms of the USDA-administered programs that provide essential nutrition to children throughout the year. The federal government administers the following child nutrition programs: the National School Lunch Program, the School Breakfast program, the Summer Food Service Program/Seamless Summer Option, the Child and Adult Food Program and the Special Milk Program. The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) provide vital sources of food for low-income children during the school year while the Summer Food Service Program, known as Summer Eats in Massachusetts, provides meals during the summer when school is not in session (DESE, 2019).

Box 1

School Year Nutrition Programs in Massachusetts

NSLP and SBP enable schools to serve reimbursable meals at free or reduced-price to low-income students each day. In the 2018–19 school year, the NSLP served **4.9 billion lunches to 29.6 million children** around the country, and the SBP served **2.5 billion breakfasts to 14.8 million children** (USDA FNS, 2020).

Eligibility to receive meals at free or reduced-price is based on a student's household income relative to their family size. Children whose family income falls within 130–185 percent of the federal poverty line are eligible for reduced-price meals that cost 30 cents for breakfast and 40 cents for lunch. Children whose family with incomes at or below 130 percent of the federal poverty level are eligible for free breakfast and lunch. Families not meeting either threshold pay full-price for school meals. To qualify, families can fill out an application through the school or they may be directly certified. Children in Massachusetts are categorically eligible and thereby directly certified for free school meals if their household participates in the Supplemental Nutrition Assistance Program (SNAP) or Transitional Aid to Families with Dependent Children (TAFDC), and/or if the child or their family receive MassHealth or if the child is in foster care, homeless or a child of a migrant family (DESE, 2019); FRAC 2019).

Another way that students can get free meals without application is through the Community Eligibility Provision (CEP) or through Provision 2. Section 104(a) of the Healthy, Hunger-Free Kids Act of 2010 (Act) amended section 11(a)(1) of the Richard B. Russell National School Lunch Act to provide schools with an alternative that eliminates the need for household applications for free and reduced-price meals in areas with high concentrations of poverty.



To be eligible for CEP, a school or group of schools must have an Identified Student Percentage (ISP) of 40% or higher. ISP is calculated through the number of students who are categorically eligible for free meals divided by the total enrollment. It is important to note that enrolling in CEP is optional for schools, and may not be financially viable for schools with low ISPs, as the program becomes increasingly financially viable as ISP rises. Provision 2 is another option available to schools who wish to provide meals at no-cost to all students. Provision 2 reduces the application process to once every 4 years and works to simplify claiming and counting processes by allowing the school to be reimbursed through claiming percentages. In the first year, schools must count the meals served in the free/reduced/paid categories and determine the percentage in each category (while serving all meals for free). In the following years 2-4, reimbursement rates are based on the "base" year (DESE 2019; USDA 2002).

Box 2

Summer Eats in Massachusetts

As soon as school lets out, the Summer Food Service Program (SFSP) plays a key role in supporting the health and nutrition for children and their families who normally rely on free/reduced-price meals during the rest of the year. SFSP is an entitlement program through USDA FNS that reimburses sponsors for providing meals and snacks to low-income children during summer months. Known as Summer Eats at the state level, the program is administered by the Massachusetts Department of Secondary and Elementary Education. Sponsors for SFSP range in type of provider including School Food Authorities (SFAs), non-profits, camps, churches, and local government agencies. The Seamless Summer Option (SSO) is another entitlement program that runs in a similar manner to SFSP, however SSO is only able to be operated by SFAs participating in the National School Lunch Program (NSLP) or School Breakfast Program (SBP). Instead of running SFSP, schools can instead apply to their state agency to operate SSO through the continuation of NSLP or SBP, which allows SFAs to streamline the provision of meals to all children age 18 and under from low-income areas (DESE, 2020). Massachusetts only utilizes SFSP during the summer for summer feeding - until 2020, where SSO became necessary due to the pandemic.



In a normal summer, operating SFSP statewide requires the coordination of schools, non-profits, community organizations, food vendors and local government agencies:

SFSP SPONSORS: SFAs, non-profits, local government entities, or camps or that assume responsibility for providing meals, training staff and meeting federal reporting and nutrition requirements

MEAL SITES: The location where children receive meals in a congregate setting, often accompanied by programming, but not required. Meal sites are often located at school buildings, parks, libraries, camps, community centers and places of worship

VENDORS: If the sponsor does not prepare meals as part of their operation, they can work with a state-approved food vendor to provide meals with components that meet the federal nutrition requirements

PARTNERS: Outreach partners like Project Bread provide technical assistance, promotional materials and engagement materials that help improve access and reach; community partnerships between sponsors/sites and other community resources such as local community centers, non-profits and food pantries are also important

Prior to 2020, all meals served through the USDA Summer Nutrition Programs were required to be eaten in a congregate setting during a designated time frame in order to be eligible for federal reimbursement. The only type of site that can offer free meals to all who are present are open sites, whereas in closed or camp sites the children must be enrolled. However, open sites must be located in areas of concentrated poverty. This means that in order to receive breakfast and lunch during the summer, low-income children must be physically present at the site in the morning and in the afternoon. Meal components must be consumed on site and cannot be taken home to be eaten at a later time (No Kid Hungry, 2020).

Open Sites	Closed Sites
Open sites can serve anyone, but are only located in attendance area of school or geographic area defined by Census data where 50% or more of children qualify for free/reduce price meals.	Serve free meals to children enrolled in activity program or camp at a site where 50% or more of children are eligible for free and reduce priced meals via family income data.



Box 3

Project Bread and Childhood Hunger in Massachusetts

Project Bread has long been the outreach partner of the Massachusetts Department of Elementary and Secondary Education in improving participation in school meals and reach of the Summer Food Service Program. For over 20 years the Child Nutrition Outreach program (CNOP) has worked closely with schools and community-based partners. CNOP provides technical assistance to those looking to start or expand a Summer Eats program, supports with state and federal SFSP regulation compliance, provides expertise in outreach strategies to increase Summer Eats participation, provides promotional resources to increase awareness of the availability of Summer Eats in local communities and helps in organizing Summer Eats events and media promotion (Project Bread, 2020).

These efforts have continued throughout the COVID-19 pandemic, Project Bread has worked to ensure maximum utilization of these federal child nutrition programs and to help individuals and families get connected to the food resources they need in Massachusetts. In the spring, CNOP provided \$191,000 in COVID rapid response grants to ensure schools could continue to serve despite being closed, while providing technical assistance, promotion materials such as flyers and signage, engagement materials, resources to engage families over social media. When the pandemic began, CNOP assisted districts who have served in the summer in previous years and also helped new sponsors who have never traditionally served in the summer transition their school meal service to SFSP/SSO models. To further support SFSP/SSO operations during the summer, CNOP awarded \$138,056 in Summer Eats grants to help make up for additional costs for staffing, equipment and infrastructure and advertisement needed to run grab-and-go and delivery distribution.



WAIVERS AND FLEXIBILITIES

Starting March 2020, the NSLP and the SBP were no longer able to operate as they normally would due to the public health emergency, school closures and the need to maintain physical distance. In addition, NSLP and SBP have administrative and regulatory requirements that make the programs burdensome to operate, particularly during a pandemic:

- School year programs require applications or direct certification for children to qualify for free or reduced-price meals at schools not operating universal meal programs (FRAC, 2019)
- Students need to provide an identification number (and payment, depending on eligibility) when receiving meals, which would be very difficult to administer safely and quickly during pandemic meal service (FRAC, 2019)
- In addition, during COVID-19, income levels changed quickly and were unable to be verified through normal channels, meaning that free and reduced-price data was not up to date

These reasons contribute to the rationale for allowing districts and sponsors to provide food to low-income students 18 and under through the Summer Food Service Program (SFSP) and 21 and under through the Seamless Summer Option (SSO). Combined with the other key waivers, particularly Parent Pick-Up, Non-Congregate Feeding, Area Eligibility and Meal Times, administrative and regulatory requirements were significantly reduced allowing schools to focus on building out their meal distribution systems to reach children at home.

In addition to school and summer meals, Pandemic-EBT (P-EBT) has been another important form of support. Through P-EBT an additional monthly allocation for families is being administered through the State's Supplemental Nutrition Assistance Program (SNAP) EBT card system to current SNAP households and non-SNAP households with children eligible for free or reduced-price school meals. Massachusetts estimated that the state will provide around 620 million in benefits from April 2020 to June 2021 for approximately 521,000 children at risk of being food insecure due school closures and reductions in attendance (Long, 2020). Approved on April 17, 2020 Massachusetts was one of the first six states to elect to use it during federal fiscal year 20, and was the first state approved in the fall to implement P-EBT for fiscal year 2021.



All of the waivers detailed in the chart below were made available to states as they chose to elect them. Most of the waivers were universally adopted by all 50 states:

Box 4

Meal Times:	Allows for the delivery of meals outside of the standard meal times and for the distribution of multiple meals at the same time	After-school Activity:	Allows service of afterschool snacks and meals outside of a structured environment and without an educational or enrichment purpose
Parent Pick-Up:	Allows parents or guardians to pick up meals for their child	SFSP/SSO Operations:	Allows the SFSP and NSLP SSO to continue to operate
Area Eligibility:	Allows SFSP and SSO sponsors to operate open summer meals sites located in all areas, not only areas where more than half of children are eligible for free or reduced-price meals	Pandemic EBT:	Provides additional funds for families to buy food while schools are closed due to COVID-19. Benefits vary by state. In MA, the benefit was 28.50 per child per week in the spring of 2020.
Non-Congregate Feeding:	Allows off-site consumption of meals & serving models like grab-n-go, curbside pick-up, mobile/bus routes, and home delivery	60 Day Reporting:	Extended deadline for all state agencies, school food authorities and organizations by 60 days to make reimbursement claims

Other Waivers: Child Nutrition Monitoring, Community Eligibility Provision Data Waiver, Food Service Management Company Contract Duration Requirement Waiver, Local School Wellness Assessments Waiver, Meal Pattern Waiver, Reporting Requirements Waiver, Offer Versus Serve , Pre-Approval Flexibility, Oversight Plan Waiver, Fresh Fruit and Vegetable Alternative Sites Waiver, Fresh Fruit and Vegetable Program Parent Pick Up Waiver, Minimum Administrative Review Flexibilities, Provision 2 Base Year, SFSP SFA Sponsor Review Waiver, SFSP Monitoring Waiver

(USDA, 2020)



COVID-19 IN MA: TIMELINE

SATURDAY, FEB 1

First positive case reported in MA

The second case was not confirmed until March 2. On March 10 Governor Baker declared a state of emergency. By March 30, the state had administered 46935 tests with 6620 confirmed cases.

SUNDAY, MARCH 15

Governor Baker orders all public and private schools shut down for three weeks starting on Tuesday March 17

THURSDAY, MARCH 12

Massachusetts is approved for two nationwide waivers for area-eligible sites through June 30, 2020:

- Unanticipated Closures Waiver to provide meals through SFSP/SSO operations
- Non-Congregate Feeding Waiver

MONDAY, MARCH 20-29

Massachusetts adopts waivers through June 30, 2020.

- Pandemic EBT
- Meal Times Waiver
- Non-Congregate Feeding Waiver
- Meal Pattern Waiver
- Parent Pick Up Waiver
- Afterschool Activity Waiver
- Community Eligibility Provision (CEP) Data Waiver
- Area Eligibility Waiver
- Child Nutrition Monitoring Waiver

TUESDAY, MARCH 31

By the end of March, most school districts shared a plan to provide meals



MAY

Massachusetts is approved to continue of several nationwide waivers through August 31, 2020

- Non-Congregate Feeding
- Parent Pickup
- Meal Times

Governor Baker announces \$36 million in grants to address urgent food insecurity issues as a result of the COVID-19 pandemic.

CNOP awarded over \$191,000 in COVID rapid response grants to school districts and sponsors

JUNE-JULY

74 more communities with no previous eligibility are able to serve as a result of waivers

AUGUST

The USDA extended flexibilities through December 31, 2020 to allow summer meal program operators to continue serving free meals to all children into the fall months

CNOP awards \$138,056 in Summer Eats grants to support staffing, equipment and infrastructure and advertisement needed to run grab-and-go and delivery distribution

SEPTEMBER

Districts adapt their meal delivery service models school by school to serve students in and out of the building.

OCTOBER

All nationwide waivers are extended through the 2020-21 school year

CNOP awards \$94,000 in grants to support the transition from summer to fall school meal operation



SUMMER MEALS IN MA: A SNAPSHOT FROM THE GROUND

While the number of food insecure households in Massachusetts is typically lower than the national average, the pandemic has caused food insecurity to more than double. Prior to the onset of the pandemic, 1 out of every 11 families had experienced food insecurity in 2019. As of December 2020, that number is 1 in 5 (Mattos et al., 2020). Responding to this need, school districts and sponsors in Massachusetts began distributing school meals as early as the first week of school closures and continued to do so throughout the summer. Summer meal service greatly varied across the state depending on a district's size and geographic location, staff capacity, previous experience serving through SFSP and a variety of other factors. Outlined below are various factors that influenced what programs looked like in summer 2020:

- Distribution: Meals were primarily distributed through "grab-and-go" systems where families and children were able to pick up meals at their local school or another community-based location such as an apartment complex or bus stop. Many districts and sponsors were distributing meals through delivery systems either utilizing their bus companies or school vans. Meals either traveled to designated locations such as bus stops or to family's home directly. Choosing to do delivery was often based on geographic, health and safety and economic concerns.
 - Amount of Sites: In the month of July alone, there were over 1170 locations to pick up meals including bus routes and pick-up sites. Based on their capacity, some districts chose to consolidate the number of summer sites (compared to their spring service) while others chose to expand the number of sites.
 - Timing, Days Served and Number of Meals: In Massachusetts, meal distribution windows varied widely as did the number of meals served per distribution. All districts/sponsors provided enough meals for weekdays. Some operated through daily distribution while others provided breakfast and lunch for the whole week, offering anywhere from one to three pickup days where packages with several days worth of food were provided. Many districts/sponsors were also providing meals for weekends and to cover holidays.
 - Types of Meals and Distribution: Various types of meals were served including shelf stable meals, hot meals, cold meals and cold or frozen meals meant to be heated up at home.
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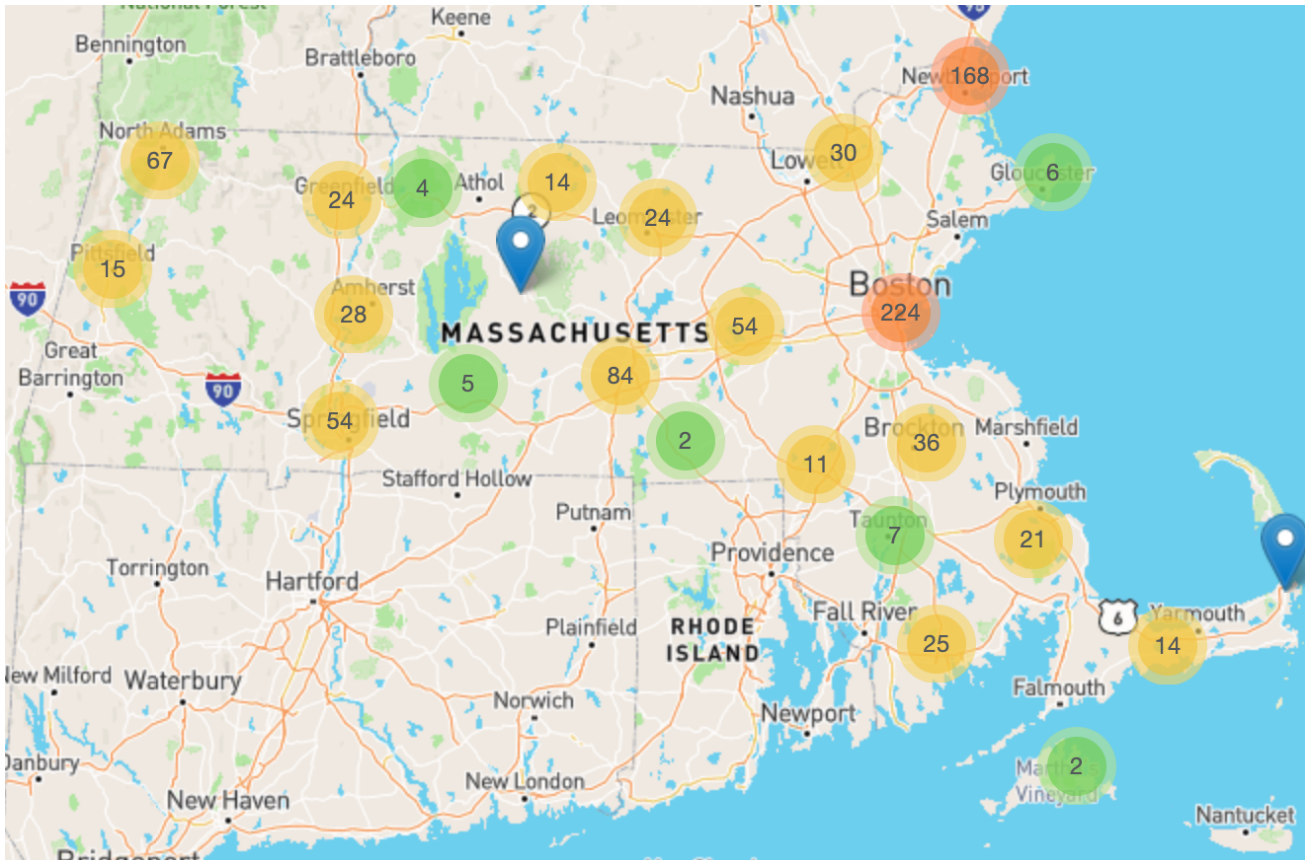


Figure 2: Meal site locations from Project Bread's "Find a Meal Site" map.

To find a school meal site, parents or caregivers could consult with their school's communication channels whether it be website/social media, Parent Square (a platform for school-to-home communication) or email. Parents and caregivers could also utilize CNOP's statewide "Find a Meal Site" map. The site map details important information including the address and name of the sponsor, their website, phone number and program dates, days available and what meals are served. In addition, many sites on the map include information about the number of meals per distribution and links to sign up if preregistration was required.

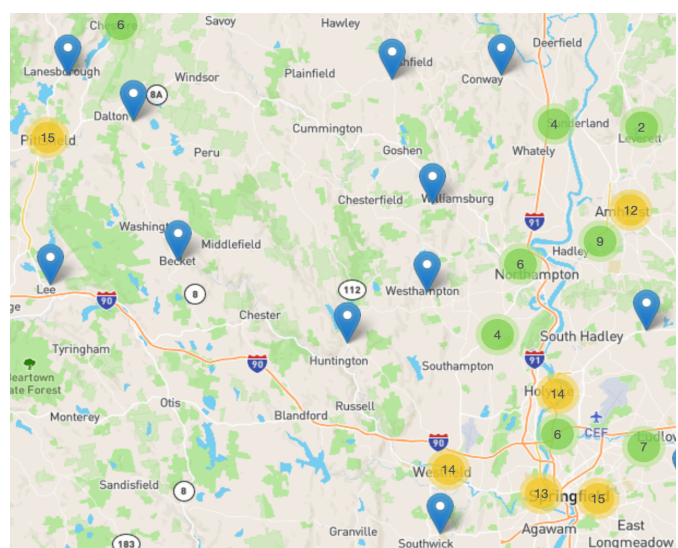


Figure 3: Example of zoomed in view of meal map for Western Massachusetts



Figure 4. Franklin County Technical staff have meals ready to be delivered in insulated bags.

We shut down on a Friday and then on Monday morning we were on four buses delivering meals. We pretty much built a delivery schedule over the course of the weekend and got everything up and running with our bus company. We ended up expanding to seven buses and because we're such a big district regionally, we reached around 17 towns in Western Massachusetts. It was huge for families, especially those that couldn't make the drive to pick up at school.

-Liz Bouchard, Food Service Director
Franklin County Technical School

When the pandemic hit, we knew we still needed to get food to kids. We had one kitchen preparing breakfast and lunch meals, and then we collaborated with our transportation department to bus the meals to eight different pick-up locations throughout the city. Six of those locations were at school buildings and another one was at a large public housing complex, and another was across the street from a MBTA stop that was kind of isolated in a part of the city.

- Melissa Honeywood, Cambridge Public Schools School Nutrition Director



Figure 5. Cambridge Public School staff pack meals in tote bags for grab-and-go pick up.



Figure 6. A yogurt and veggie snack pack, an example of a meal given in Marlborough's robust meal delivery bus route system

The message out to the community is that everyone in Marlborough can participate, not just those who typically participate in school meals. For us, that number is high at 62%. From a community standpoint we are very diverse. With this in mind, we advertised these meals in different languages including Spanish and Portuguese. I think that definitely helped our reach. At the height, we had 450 bus stops that we then consolidated. We did about 22,000 meals that way in June, July and August.

- Doug Dias, Director of Finance and Operations
Marlborough Public Schools



WAIVERS AND FLEXIBILITIES

SFSP/SSO Operation

Allowing the operation of SFSP/SSO through June 30, 2021 is key in allowing School Food Authorities and community sponsors to safely provide meals, eliminating the need to collect payments at meal sites and thereby limiting the exposure to COVID-19. In a normal school year, program staff rely on a point-of-sale system to check free/reduced eligibility and collect payments. As a result of this waiver, school food service staff could keep a total count of meals served rather than identifying each child, allowing them to quickly provide meals at sites (Pulkkein, 2020). In combination with the waiver of the area eligibility requirement, detailed in the next section, the state of Massachusetts saw a significant increase in number of SSO/SFSP sponsors. All districts, regardless of area eligibility, could operate as open sites giving no-cost meals to anyone in need.



Figure 7. Example of 'power packs' served at SLRSD

There were 250 to 290 families at the peak. We wanted to keep feeding them, but if the waiver didn't come through, we really wouldn't have a choice because 1. We couldn't logistically operate NSLP/SBP and 2. there was no budget. Our budget ended up being in the negative and the summer rates provided the reimbursement we needed to continue to serve meals. There's just no way we could continue to provide it for free. Being able to operate through the summer programs provided the key flexibilities we needed throughout the school year. Combined with the other waivers, we could continue to serve through summer 2020.

—Megan Ahrenholz, School Nutrition Director, Silver Lake Regional School District



Area Eligibility

The scope and structure of the Summer Food Service Program and the Seamless Summer Option have not remained stagnant since their inception. Changes have been made to work to expand access, incorporate healthier food to address issues of childhood obesity and removed limits on numbers of sites while both legislative and non-legislative activities have led to an increase in participation in some states. However, the area eligibility requirement is one aspect of SFSP and SSO that has remained unchanged since 1981. To operate open summer meal sites (meaning any child may walk up and receive a free meal, no questions asked), sites must be:

- Located in a Census Block Group (CBG) or Census Tract in which 50% or more of children are eligible for free or reduced priced meals
- Where three adjacent CBGs are averaged to 50% eligibility in the case that at least 40% of children in each CBG are eligible
- Determined area eligible through the use of school data that is collected by the individual district through applications and direct certification (USDA, 2014)

The Massachusetts Department of Elementary and Secondary Education adopted the area eligibility waiver in March to allow all school districts and community sponsors to provide no-cost meals to children despite eligibility. This meant that schools and sponsors electing to operate were able to provide fully reimbursable meals in areas where fewer than 50% of students qualify for free/reduced lunches.

The expansion helped make meals possible for children who already relied on school meals during a normal school year and children in need of help due to their parents being laid off, losing income or other financial challenges. Without the extension of this waiver through the 2020-2021 school year over 230 communities would have had to change operations or shut down, impeding access to the thousands of children and families who relied on these sites for food.

“Like many districts across the state, this was our first time serving in the summer. Our eligibility sits around 10%. We’re not even close to the 50% so we’ve never been able to have summer sites in Milton. Still, that 15% represents 650 families in our district, 650 families whose kids aren’t getting fed in the summers because of the requirement. While there was a learning curve for us- I want to see this somehow continue. There is no reason those 650 families shouldn’t be able to access meals in the summer. The school food service system is already in place, we don’t need to reinvent the wheel to feed those kids. It has been invaluable to families in the pandemic, but I don’t see why they shouldn’t have access to meals in the summer if they need them. It made me think, how are my free and reduced kids getting their nutrition needs met during a normal summer?”

–Jackie Morgan, School Nutrition Director, Milton Public Schools



The area eligibility waiver helped shed a spotlight on one of the inherent challenges that the Summer Eats in Massachusetts faces each year. Programs located in rural and suburban areas must address the challenge of high eligibility thresholds that limit participation in areas without a concentration of poverty greater or equal to 50%. This greatly restricts access to thousands of kids who rely on federally-reimbursed meals during the school year. For years, advocates, schools, and non-profit organizations have been calling for a lowered eligibility threshold (such as 40%) so districts with lower than 50% eligibility percentages, but still a significant amount of need, can serve through Summer Eats (No Kid Hungry, 2015).

Districts like Milton, who have even lower eligibility, still have children who rely on school meals for vital sources of nutrition and would benefit from continued access to meals during the summer. On average, only 15% of children who qualify for free/reduced meals during the school year participate in meal programs during the summer (FRAC, 2019). In Massachusetts, that number is even lower: in 2019 only 12% of eligible for free/reduced meals participated in Summer Eats. Waiving or lowering area eligibility requirements could result in a significant increase in participation rates across the state, as we have seen during the COVID-19 pandemic.

Non-Congregate

Current federal summer meals programs under SFSP and SSO require that children eat meals in a specific location at a pre-determined time. The Congregate Feeding Requirement stipulates that children have to travel to the location and eat meals together on site in order for those meals to be federally reimbursed. There are many benefits to providing meals through congregate feeding including: increasing children's nutrition intake, encouraging children to try new foods and create good eating habits, fostering community engagement and providing enrichment. However, despite these benefits, participation numbers remain low across the country and the state as compared to the children who participate in school year programs (No Kid Hungry, 2015). The pandemic illustrated how congregate feeding during the summer could be contributing to these low rates of participation.

Due to social distancing protocols enacted to curb the spread of the COVID-19 virus, the COVID-19 Child Nutrition Response Act granted a waiver that allows for non-congregate feeding across all child nutrition programs including the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and the Summer Food Service Program. This allowed programs to serve meals outside of the standard congregate setting. The non-congregate waiver has worked to support social distancing to ensure COVID-19 safety measures are met to protect staff, children and their families while also making sure children don't miss out on meals. The ability to pick up meals and take them home rather than eat them on-site provided not only social distancing, but also an important new point of access for many families.



The Congregate Feeding requirement is a significant hurdle SFSP/SSO faces in reaching children when school is out of session. Working families often don't have the time or ability to bring their child to a site and sit with the child while they eat the meal, or the geographic location of the meal site makes it difficult for children to access on their own. Furthermore, most children from low-income backgrounds stay at home during the summer months and do not participate in summer programs such as camps, reading programs or enrichment programs where meals may be served (FRAC, 2014). Children and their families also can have difficulty accessing the sites because of lack of transportation. Weather is another factor that can make sitting at meal sites unappealing and difficult. Rain, thunderstorms and high temperatures can impede families from attending during the summer months (No Kid Hungry, 2015).

New and recurrent summer meal sponsors who were interviewed for the purposes of this report indicated the best way to reach more communities in summer months is to allow their programs to adapt to models that fit the needs of where they serve. For some areas of Massachusetts, especially rural areas where families have to drive long distances to get to meal sites, this could mean allowing meals to be taken home rather than eaten on site. One nutrition director from a rural district noted that the ability to serve in non-congregate settings would have much broader implications for their area, especially in cases of extreme weather, or other safety concerns. This goes the same for urban areas like Boston, where, as illustrated in the quote below, meals could be picked up on the parent's way home from work and eaten the next day.

The non-congregate waiver has provided new access to reach working families. It provides a way to give meals to folks that initially may have a barrier there. We love our summer programs here at the Y, they are a big part of what we do, but now we see that non-congregate works too. Going forward, even if it is not the same as it is now, we've seen what we are able to do without this barrier- we've come up with something new. Kids could come pick up meals even if they couldn't stay and eat and that will certainly increase food consumption and access among the low-income kids we serve. Parents would come after or before work and that definitely increased how many kids we could serve. The non-congregate waiver was essential to provide broader access to children in the community during the pandemic, but it is a flexibility I think could have huge implications going forward.

-Wendy Zinn. Senior Vice President Partnerships & Social Responsibility. YMCA of Greater Boston



Parent Pick-Up and Meal Times

Nearly all of Massachusetts' school districts offered parent pick up as their primary form of distribution. The parent pick-up waiver allowed parents or their caregivers to pick up meals without the child being present. Under normal SFSP/SSO operations, the child must be present to eat the meal within a specific time frame in a congregate setting with accompanied programming (No Kid Hungry, 2020). Allowing for parent pick up increases access to working families who may not have the time in their schedules to sit with their children while they eat a meal and gives them the flexibility to consume the meals at a time that is convenient for their household's work schedule. Flexibility in pickup hours also decreases the burden on families with young children who may have more restrictive schedules and allowing parents to pick up food without the child present also provides important flexibility.

The parent pick-up and meal times waivers were especially important with the particular communities we were working to get meals to this summer. A lot of the families lived in public housing and were thus trying to minimize exposure. They were able to be able to have one person come and pick up for the whole apartment or for the whole family. It was incredibly helpful to have them be able to drive up, put it into their car and have them drive away. People didn't want their kids out during the pandemic, which makes sense, but we've seen how effective this model can be. Sending meals home with kids during normal summer on top of our programming would be an adjustment, but I've seen how impactful this has been for improving access in our communities, pandemic or not.

-Aubree Cecil, Director of Operations, Waltham Boys & Girls Club



SUMMER PARTICIPATION & FINANCIAL IMPACT

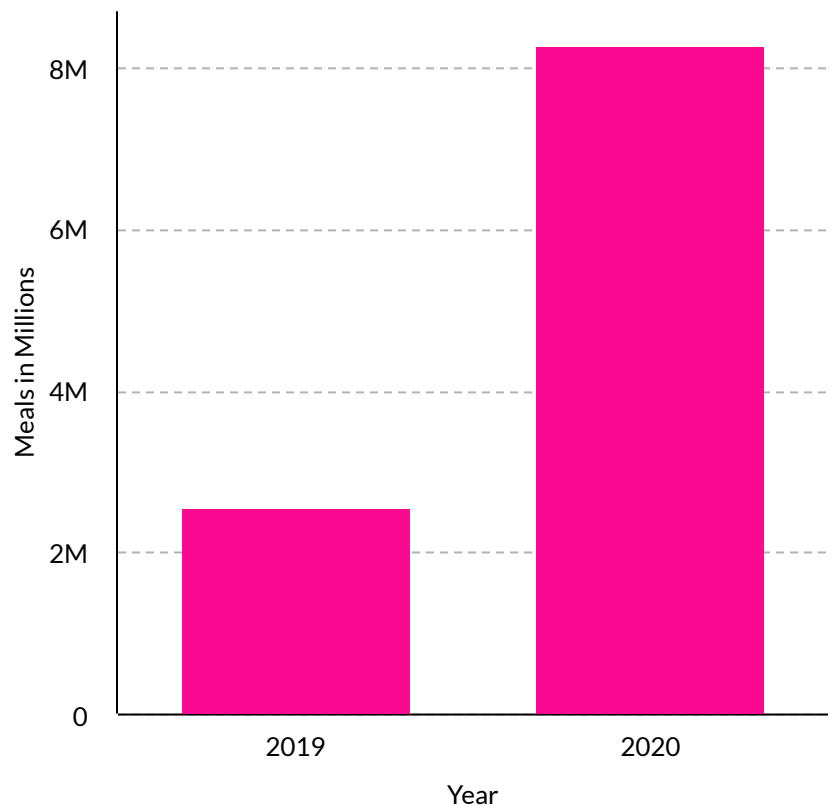
Statewide Increase: Summer Meals Served

Total meals served throughout the duration of summer 2019 (mid-June through the end of August) under SFSP reached just over 2.5 million. In 2020, 8.2 million meals were served in July and August alone - a 223.5% increase over the previous year. Meal counts for summer 2020 were taken only from July and August given that SFAs and sponsors were serving through SFSP/SSO throughout the entire month of June when school was still in session and includes meals served through both SFSP and SSO. Meal sites operated by School Food Authorities and community sponsors that had previously operated under SFSP continued to do so. On the other hand, new meal sites that were run through SFAs who were not SFSP sponsors only operated through SSO.

The majority of the meals were served in area-eligible locations (detailed in the next section), despite the waiver of this requirement, indicating the connection between the unprecedented increase (223.5%) in total meals and waivers including parent pick up, meal times

and non-congregate feeding that allowed for multiple meals to be distributed to families at one time. However, a significant amount of meals were served in areas with no or partial eligibility, which would not have been possible without the area-eligibility waiver.

Total Summer Meals Served



2019

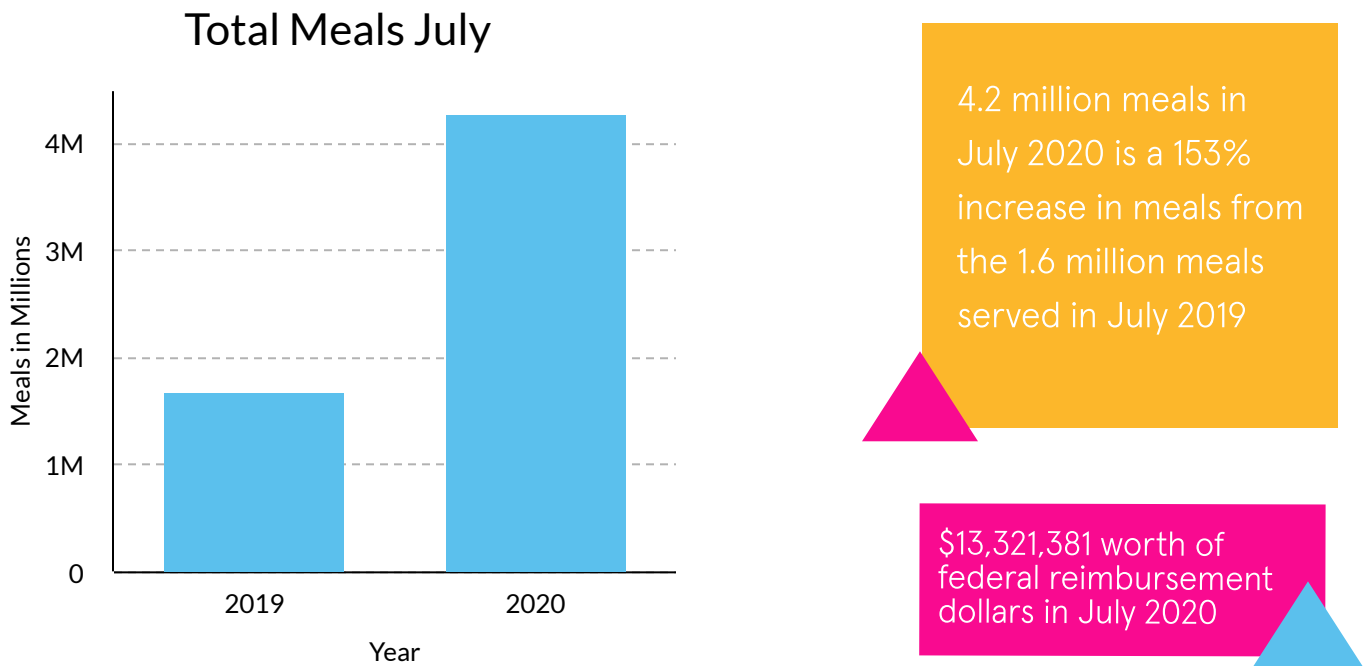
2.5 million meals

2020

8.2 million meals



Statewide Increase: July 2019 vs. July 2020



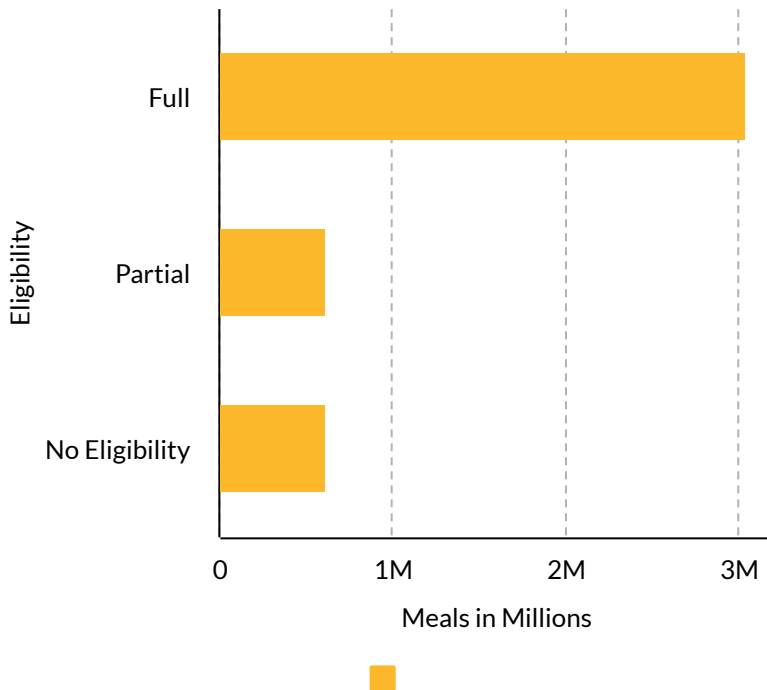
The month of July is typically the busiest month for summer meals. By July, summer sites are fully up and running and experience the highest participation of any summer month. During July 2019, 1149 sites served 1,688,017 meals across the entire state of Massachusetts. In July 2020, that number more than doubled; over 4,281,021 meals were served at 1173 sites. While the number of sites only slightly increased, participation and reach was drastically expanded through delivery routes, grab-and-go pick-up, providing flexibility in times and provisioning multiple days worth of meals.

Another factor for the increase in 2020 was due to waived area eligibility. For example, with 10% students qualifying for free/reduced lunch, Andover Public School District has never qualified as a SFSP sponsor. In the month of July alone, Andover Public Schools served 64,780 meals out of just 3 three open sites at their elementary, middle and high school. The ability to pick-up meals and eat them at home and pick-up meals for multiple days at a time are two primary reasons for this increase. However, given Andover's low eligibility, the district could never qualify to serve through the SFSP. The large number of meals served this summer demonstrates a significant need in Andover, despite lack of area eligibility. Children who live in non-eligible areas are at risk of experiencing gaps in nutrition during the summer months due to area eligibility thresholds. As a result of the waivers, many more children were able to get the nutrition they need in 2020.

July saw \$13,321,381 worth of federal reimbursement dollars go directly to schools and sponsors supporting the state of Massachusetts during a time of extraordinarily high levels of hunger and hardship. Of the \$13+ million in total reimbursements during this month, \$3,688,370 went to sites who would have not been able to serve without waived area eligibility. The waiver of area-eligibility brought more federal funding into the state to feed children at a critical time.



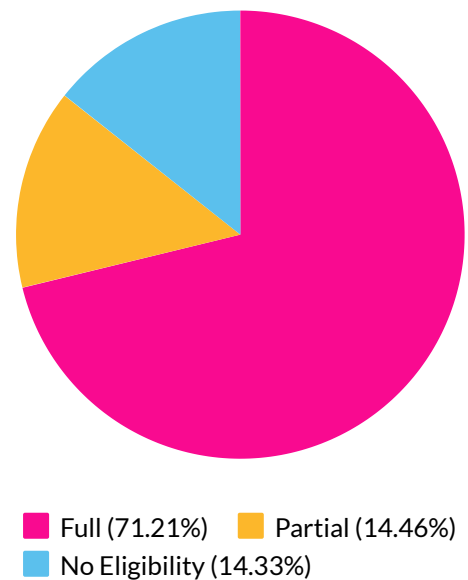
July 2020 Eligibility & Number of Meals Served



1.6 million total meals were served in July 2019, while in July 2020 1.23 million meals were served at non-eligible sites alone

Over two-thirds or 71% of total meals served in July were served at sites in communities with full eligibility. "Full eligibility" means that all sites operated by the sponsor are eligible to serve through SFSP. In this chart, no eligibility is categorized by sponsors who have no area eligible sites in their communities given that less than 50% of children in the area where the sites are located qualify for free or reduced price meals. For example, a district like Milton, who served 20,285 meals in July, has only 15% of students eligible in their community. A community like Cambridge with 37.5% eligibility has a higher percentage of children who qualify for free/reduced meals through NSLP and SBP, however, only pockets of the city have area eligibility. Partial eligibility in this graph is categorized as meals served at non-eligible sites by districts who have some pockets of eligibility in their districts. While the majority of 2020 meals were served at sites that were already eligible, 1.4 million meals were served at non-eligible sites. It is important to note that this total for non area eligible meals served is close to the same number of meals served throughout the entire month of July 2019, again indicating a large expansion in access.

July 2020 Eligibility & Total Meals Served





EMERGING OPPORTUNITIES

Although summer meal service during the COVID-19 pandemic posed logistical, operational and financial challenges that cannot be overlooked, School Nutrition Directors (SNDs), community and parent advocates, local nonprofits and federal-level anti-hunger policy advocates agree that the waivers and flexibilities had significant benefits. One of these benefits was the new and emergent models of meal service that included grab-and-go and delivery. Serving summer meals through these models resulted in drastic expansion in reach and access. According to several districts and sponsors, the emergency meal programs also gave parents an opportunity to see the components of school meals that are nutritious and complex, countering negative perceptions of school lunches.

While COVID-19 brought light to the disproportionate impact hunger has on low-income communities and communities of color, the provisioning of universally free meals to all children helped reduce stigma usually attached to receiving free meals in the school year and summer. In addition, the state of Massachusetts saw increased community collaboration between schools, non-school sponsors such as YMCAs or Boys & Girls Clubs with other points of access for food resources including food banks and shelters. Some districts collaborated directly with community organizations to communicate about meal distribution while some districts relied on collaboration for the distribution process itself.



Figure 8: Wendy Zinn from the Boston YMCA with children taking home food boxes



Emergent Delivery Models

Challenges in accessibility for sponsors of summer meal programs are often related to transportation. A primary barrier to participation in summer meal programs is accessibility of the meal service location. Accessibility refers to meal site locations that are:

- Within walking distances to children's homes
- Accessible by public transportation for children who are not within walking distance
- Spaces that are well known and frequented by children
- Safe and community-based
- Located in communities with high need
- Convenient



Figure 9: Family liaison hands out meals and books at apartments in Cambridge

Various communities who participate in Summer Eats in Massachusetts have worked to address transportation and accessibility issues through the adoption of mobile meal sites. For example, in 2019, a collaborative effort between The Mayor's Office of Food Access, Boston Public Schools and Love Your Block resulted in a new pilot program: Boston Summer Eats Mobile Meals. Mobile meal sites enabled sponsors to overcome transportation barriers and reach children where they are.

This summer, the waivers provided the opportunity for sponsors to reach children through multiple models, drastically increasing accessibility overall. Sponsors employed grab-and-go models where parents could drive up and pick up meal bags, delivery models for families lacking transportation and in many cases, a combination of the two.

Grab-and-Go

Summer meals in Massachusetts were primarily distributed through "Grab-and-Go" systems where families and children were able to pick up meals at their local school or another community-based location such as an apartment complex or bus stop. The number of schools/sponsors across the state serving meals this way remained high throughout the spring, summer and into the fall, even with remote classes. known in the community and regularly frequented by children. Allowing grab-and-go systems and meal delivery created



new points of access that made it easier to reach families during the summer.

Through the fall, districts have utilized the grab-and-go method to send bags of meals home with students who are hybrid remote/in person learners to ensure they have meals on the days they are not in school. The majority of grab-and-go meal sites were located on school grounds. School food service staff and volunteers would distribute the meals outside and families could either get the meals put directly into their cars or families without vehicles could pick up through a socially-distanced line system. Some school districts, such as Silver Lake Regional School District, got creative when temperatures dropped creating a "grab-and-go" window through which parents could wait in a socially-distanced line to pick up the meals. Districts in rural, suburban and urban areas also utilized sites in the community. Sponsors such as the YMCA of Greater Boston utilized their existing buildings for packing, storage and distribution and engaged other community-based partners to increase the number of pick-up sites.

Meal Delivery.

Getting children to meal sites in a typical summer can be challenging. Sites may be too far away or families lack transportation that would allow them to reach the meal sites. Mobile SFSP meal sites have become increasingly important tool in reaching under-served areas. Mobile sites are especially important in rural and suburban areas where distance and transportation pose as significant barriers (No Kid Hungry, Mobile Meal Toolkit). During summer 2020 mobile meal sites couldn't operate as usual given the health and safety restrictions and social distancing protocols. Van delivery and bus delivery became key in reaching families who may not have had access to transportation or may have become sick and home-bound with COVID-19.

Meals either traveled to designated locations such as bus stops or to family's home directly. Choosing to do delivery was often based on geographic, health and safety and economic concerns. Families were not always able to get to the grab-and-go sites because they lacked transportation, had conflicting work schedules, had been exposed to and/or were sick with COVID-19 or had other health and safety concerns. The amount of delivery locations varied district by district as the pandemic progressed. Some districts consolidated the number of stops to those with the most participation while others expanded the number of distribution sites as need increased.

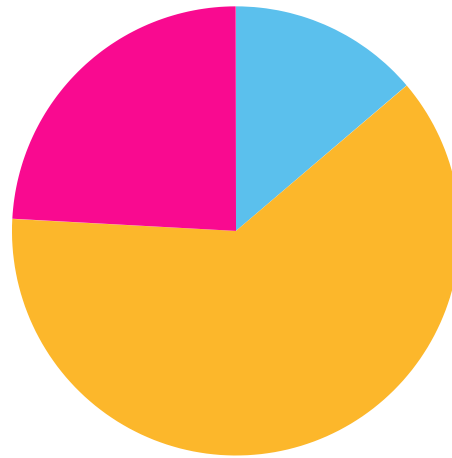


Take for example Marlborough Public Schools, an urban district with close to 62% of students who qualify for free and reduced lunch who rely on school meals daily. At the height of COVID-19 during the spring, Marlborough Public Schools was distributing meals at 450 bus stops across the city. These neighborhood locations were familiar to families and within walking distance of their residence. Franklin County Technical on the other hand is a rural regional district, but they decided to utilize bus delivery to reach 17 surrounding towns.

The majority of delivery routes operated in districts that had no or only partial eligibility. Of the 31 routes operated in summer 2020, 22 were located in areas without eligibility or only partial eligibility while only 7 were operated in eligible communities.

Of the 357,423 meals served through this method, 195,796 were served in eligible areas. The remaining 161,627 meals were served in non-eligible or partially eligible areas and could not have been served without the area eligibility waiver.

Bus Routes/Delivery July



- No Eligibility (13.79%)
- Partial Eligibility (62.07%)
- Full Eligibility (24.14%)

2020

357,423 meals served through delivery routes

Of the 357,423 meals served, 161,627 of those meals were served by non-eligible or partially eligible sites



Changing Perceptions Around School Meals

Many School Nutrition Directors (SNDs) noted that the COVID-19 pandemic underscored just how important school meal service is. School and summer food service staff became affectionately known as "heroes" and were featured on local news stations, articles and social media. Although getting meals to children during a pandemic didn't happen without major challenges, changing perceptions of school meals was certainly a benefit in some communities. School and summer meals are required by the USDA to specified amounts of fruits, vegetables, whole grains, and fat-free and low-fat fluid milk in school meals, limit sodium, saturated fat and trans fat in meals, and meet the nutrition needs of school children within their calorie requirement (USDA, 2019). School meals were being utilized both by families who qualify for free and reduced lunch through application or Census data and by families who don't qualify. This gave both parents who may not typically participate in SFSP or NSLP and those that do an opportunity to see the nutritious components of school meals. Several SNDs reported that the increased exposure to meals led to positive parent feedback. Parents communicated with SNDs that they did not know that every school meal had healthy components and would have their child buy school lunch more often. Not only does this create a positive culture where eating school meals is not stigmatized, it generates revenue for the school nutrition departments.



Figure 10: Gratitude from Waltham parents



Figure 11: Barnstable Public Schools school meal heroes

"Having the opportunity to get these meals out to people has also changed perception in school meals. I had a parent tell me "Oh, I didn't know that you guys served this". I'll definitely have my kid buy lunch at school when things returned to normal."

-Sarah Coughlin, Director of School Food and Nutrition, Braintree Public Schools



Reduction of Stigma

While the National School Lunch Act (1946) legislation prohibits practices that single out, identify or discriminate students who qualify for free/reduced meals, this does not mean that shaming does not occur. Students that qualify for free lunch face stigma on multiple fronts and may choose to skip meals altogether. While the NSLP and SBP programs are critical in providing low-income students the nutrition they need to learn and grow, they inevitably reinforce existing inequalities. In schools that do not qualify for universal free meals, the cafeteria is a place in school where children are separated and categorized by their household income. While unintentional, the programs effectively create a socio-economic hierarchy within school that is reinforced every day by lunch: some students get lunch for free, some get lunch for a reduced cost, some pay in full for their meal and some bring meals from home (Baker, 2018). Online systems and lunch cards have helped make the system more anonymous but issues persist. Bullying, labeling and name calling still occur when students learn that their peer doesn't pay for lunch or pays a reduced price. This stigma can be even stronger in districts with a low percentage of students who qualify for free or reduced price lunch. One SND noted:

"We have a low percentage of eligible students- we sit at around 15%. Our participation in lunch is still not 100% of the students who qualify, but breakfast is even lower. It is only around 7%. I think that this has to do with stigma, everyone knows what it means when a child has school breakfast in the classroom"

On the other hand, students that qualify for reduced price lunch may still not be able to afford the price of lunch or breakfast during the school year. The accumulation of meal debt is a huge issue for districts across the state. In 2016, the USDA published a policy memo responding to this need for schools to develop policies to address debt. This however, was left solely up to states and individual school districts and policies and practices vary widely across the board. Shaming practices on the part of the school for children with school meal debt or insufficient money to buy school lunch can include: giving an alternative meal such as a cheap sandwich in place of a hot meal, prohibiting students from extracurricular activities, or withholding documents such as report cards. Meal debt shaming creates stigma among peers and significantly undermines academic achievement, punishing children whose families are facing economic hardship (Baker, 2018)

Stigma can happen in the summer, too. A recent needs assessment survey conducted by Project Bread that surveyed over 720 families concluded that awareness is the most common reason for low participation rates meaning that many families who typically participate in NSLP or SBP do not know that summer meals are available to them.



However, if they do, a stigma may surround the meals. Activities at SFSP sites can take away from this stigma so that children are not just there for the meal. The degree varies by age group and teens may be more reluctant to go to meal sites due to the inherent stigma of receiving free meals. Efforts to rebrand SFSP as a community event, including activities, raffles and giveaways has eased this to some extent, but there is still a long way to go when it comes to reducing stigma (Larin, 2018)

As a result of the waivers and flexibilities, districts were able to use innovative, community based approaches to provide meals while helping to reduce stigma. With the elimination of eligibility requirements, all families were able to participate in Summer Eats, no matter the poverty statistics of their community. Several SNDs said that throughout the summer families from all sorts of income-levels participated in the meal program, some due to increased hardship from the pandemic, while others wanted to continue feeling connected with their school.

"Food insecurity happens beyond the threshold of who the federal/state qualifies as low income. This summer, I believe we had participation beyond what is typically categorized as need-based participation, but this is not to say these families weren't in need. I can definitely say that having the waivers reduced the stigma of participating in meal programs and changed the perception of families who may have never gotten school meals. If this continued, it would continue to reduce stigma in school and out of school. On top of this, it would also ease my budget and help me focus on what's important, which is developing exciting menus, developing nutritious menus and partnering with community agencies to have a wider reach."

-Doug Dias, Director of Finance and Operations, Marlborough Public Schools



Community Collaboration

Successful SFSP program implementation requires collaboration across multiple sectors: local government, social service organizations, community-based organizations, non-profits, private business, parks services, among others. Building a network of organizations to support SFSP aids in sustainability of programs. Partnerships in the community not only expand reach but can provide untapped resources including knowledge of community needs, ideal site locations, and ensure town services are working in alignment towards the common goal of ending childhood hunger. Key to operating successful meal programs in the summer is assessing the needs of the community and tailoring SFSP programs to fit those needs. Community-based efforts are vital in addressing awareness and reach, two of the most common barriers in Summer Eats (USDA, 2015).

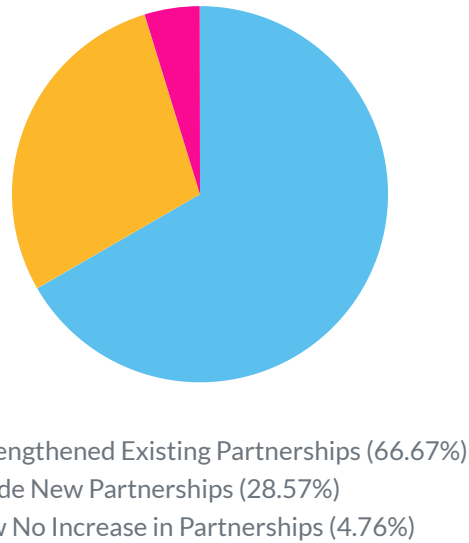
Massachusetts school districts have demonstrated incredible flexibility, resiliency and creativity throughout the entirety of school closures and have done a tremendous job of creating opportunities for stakeholders in the community through collaboration. In many districts, consistently getting meals to children through the pandemic would have not been possible without the collaboration of community partners and community services. One SND described what happened during the emergency meal response as "strengthening the connective tissue of nutrition programs and communities". Some districts collaborated with community partners to advertise their meals, including Project Bread, while other districts relied on community organizations for the meal preparation and distribution itself. Increased collaboration ultimately leads to expanded reach and strengthened community networks. Take for example a district like Cambridge, who worked with their social service agency in their area to reach more children and stay consistent with pick-up locations throughout the summer. This allowed Cambridge to receive a higher reimbursement rate by operating through SFSP rather than SSO, easing the financial burden associated with distributing meals remotely:

For serving summer meals we at Cambridge Public Schools collaborated with the Cambridge Department of Human Services (DHS). DHS used their existing bank of staff to essentially continue the meals program as we have had it set up through the summer. The meals were being delivered to several of the same eight locations around the district, but it was DHS and their staff who were in charge of distribution and claiming instead of the school nutrition staff. As you know, during typical years her program has run the summer meals we would often loan her some of our refrigeration equipment, various sites, and we would help share data for her to determine which schools would qualify to be open sites. We already had an existing relationship, but definitely not to the degree that it has since become. It's a win-win situation and I see us collaborating more closely in the future to reach more kids.

-Mellissa Honeywood, Cambridge Public Schools



In our interviews, SNDs and community-based sponsors talked about existing collaboration and new collaboration as a result of school closures and waivers. Of the districts and sponsors spoken to, over 95% indicated that they either strengthened existing partnerships, made new partnerships or a combination of both. Partnerships between schools and summer and after school meal sponsors were important to successful operations, as well as partnerships between local organizations, restaurants, food banks and shelters. SNDs indicated that they feel increased community connection will aid their reach and participation moving forward.





NEW CHALLENGES

Health and Safety: Districts and sponsors have been tasked with the new challenge of keeping their staff and students safe and healthy. On top of maintaining social distancing orders, meal service, whether remote or hybrid, has had to adopt new procedures and precautions to ensure safety in making, packaging and distributing meals creating an entire new set of logistics for staff. At the beginning of closures, having adequate PPE was a big challenge. Even with adequate PPE, staff members still run the risk of getting infected with COVID-19. Some districts in Massachusetts had to shift their meal service because of COVID-19 infections that led to labor shortages. In other districts, staff chose to stay at home for some or all of the pandemic due to being immunocompromised or having other health concerns. In the spring, many districts chose to pay their staff whether or not they work or not, some considered hazard/pay or overtime. The additional cost of PPE, added costs of to-go meal packaging and meal components, lack of staffing or providing additional pay have all added to the financial burden incurred by school districts during closures. On top of this, the fluctuation in COVID-19 cases have required schools to be constantly flexible, having to adapt their programs numerous times as schools switched from hybrid to remote depending on infection rates in their particular district.

Sourcing and Equipment: During the peak of school closures, some districts faced significant challenges with sourcing for both food and supplies (such as PPE) and shelf-stable foods which faced greater demand. New sourcing strategies had to be implemented for grab-and-go containers and other needs associated with multi day meal provisioning. Over the summer, some sponsors had to pursue new relationships with vendors. In addition to sourcing, keeping meals hot or cold during delivery or grab-and-go posed a significant challenge to many districts as there is a high cost associated with acquiring new equipment that can effectively store and transport a high quantity of meals. While some districts and sponsors received grant funds to recoup these costs, more financial assistance is needed to support equipment costs needed for safe meal distribution and adequate staffing.

Registration and Documentation: During closures, it was difficult for districts to ensure consistency in the number of meals prepared and number of meals needed by families each week. Several districts interviewed chose to have meal sign ups online while others have limited the numbers of meals that can be picked up per person per day. The major priority in distribution and documentation has been supporting social distancing and mitigating unnecessary contact while easing access to food for families and reducing the burden on staff.



One SND noted that they feel there were several families in the district who weren't participating for fear of needing to show identification. It was important for districts to clarify that identification was not needed and families would not be asked about their immigration status.

Choosing Time Windows and Frequency of Pick-Up and Delivery: Financial viability, staffing, and potential exposure and health risks, safety concerns such as increased traffic all had to be weighed with what frequencies and times are most useful for families. Many distribution sites moved from providing meals every day to providing multiple days worth of meals or an entire week's worth of meals in a single pickup or delivery. One SND noted that her district chose to distribute on multiple days simply because they did not have the capacity to prep and store a week's worth of meals for all the families they were serving. Another SND talked about how their site only offered pick-up one day a week, but this ended up posing safety and traffic concerns and she felt that they might not be able to satisfy the demand in a single day. In all cases, meal providers were constantly having to weigh a variety of considerations: sustainability and cost efficiency of using delivery models vs. grab-and-go, what time windows and frequencies are most useful to families; how many staff they can have on site safely and the staff's capacity to produce enough meals during a given shift, among others.

Communication: With students out of school, communication became even more challenging; districts and sponsors used a combination of mail, online posts on school websites, social media, email and apps such as Parent Square to to share information about menus and meal distribution.

Financial: Schools serving meals through SSO or SFSP means meal providers must only track the number of meals rather than meals by individual child, however, the reimbursement rate is not high enough for some districts. For example, the increased cost in packaging is not accounted for in the reimbursement rates nor is the additional labor required by staff to pack and distribute those meals. Any substantial effort that reaches a wide number of children will incur significant extra costs including refrigeration, storage, staff pay, and additional transportation costs associated with delivery. Some districts implemented robust, large-scale distribution programs that the reimbursement rates did not support meaning that they operated with a negative budget. Aside from the summer, most schools during COVID were serving less fewer than before. This meant less revenue was being generated while operation costs greatly increased.



KEY TAKEAWAYS

Meals provided during school time through NSLP and SBP and meals provided during out of school times through the SFSP have always been essential to ending childhood hunger and supporting children in healthy development and academic success. This became even more evident during the COVID-19 pandemic as food insecurity has risen to unprecedented levels in our state and nation. As the effects of COVID-19 continue to disproportionately impact low-income families with children, school meals in Massachusetts provide the opportunity to support both food security and good nutrition among children and their families.

With their networks, food service expertise, and direct connection to families, school districts and sponsors have become the natural leaders in providing and promoting meals during the emergency response. The USDA supported the efforts of schools and sponsors by providing key flexibilities that allowed operation of Summer Nutrition Programs (SFSP/SSO) in place of school meals programs (NSLP/SBP); waiving the congregate requirement which allowed for meals to be distributed through grab-and-go models and parent pick-up; and providing flexibility in meals times which allowed for multiple days of meals to be distributed at one time. Very importantly, the USDA waived area eligibility, which usually stipulates that SFSP can only operate in geographic areas with concentrated poverty, or 50% of children who qualify for free and reduced lunch are allowed to operate as open sites.

The waivers not only allowed schools and sponsors to serve safely, maintain social distancing and redirect funds towards essential equipment for serving including adequate PPE and storage equipment, but also drastically expanded reach and access to thousands of children across the state of Massachusetts. The waivers shed light on many of the inherent challenges faced by SFSP sponsors each year, particularly high eligibility thresholds. As a result of these combined flexibilities and waivers, the state saw a drastic increase in total meals served. In the months of July and August alone, 8,282,905 meals were served as compared to 2,560,271. One indicator of this 223% increase is the rise in need for food resources caused by the pandemic. However, as we have demonstrated through this report, making the meal programs as accessible/flexible as possible has been key in feeding the families who have relied on the program. Participation numbers pre-covid demonstrate the effects of the restrictive requirements, whereas summer 2020 participation numbers demonstrate how access is greatly expanded when those requirements are lifted.



The economic recession is anticipated to last years post-COVID pandemic. Food insecurity rates among families with children could rise to even greater heights unless we take drastic and immediate action. School nutrition departments, local government agencies and community-based organizations have shown incredible flexibility, resiliency, and innovation to ensure children had continued access to breakfast, lunch and, in some communities, dinner during school closures and this summer, despite having to operate in a totally new format. Continued access to these programs is crucial to ensure children receive the nutrition they need. It is up to federal and state governments and local communities to work together to ensure summer programs receive the support they need to continue to reach children who depend on them. While the continuation of waivers and flexibilities through the 2020-2021 school year helps schools and community sponsors to continue to provide meals through Summer Nutrition Programs, many of the challenges faced will remain through summer 2021 and beyond.

To meet children's nutritional needs during the pandemic and to build a more resilient, equipped system for the future, schools, state and federal policy makers, nonprofits and other stakeholders can consider the following:

1. Prioritize immediate food security among low-income families with children by maintaining waivers and flexibilities through the duration of the COVID-19 pandemic:

- Allowing for parent pick up, flexibility in meal times, non-congregate feeding and the provisioning of multiple days worth of meals at one time was directly tied the drastic increase in participation in Massachusetts this summer and must be prioritized as long as the economic impacts of the pandemic continue to effect families.
 - The continuation of meal distribution options including grab-and-go, and at-home delivery or delivery to a community site where families experiencing food insecurity live, will allow access to families who may not be able to access SFSP through its traditional format which dictates families must bring their children to eat meals in a congregate setting at a predetermined place and time.
 - Waiving area eligibility allows communities and districts to provide summer meals to all children that need them, not just those who live in an area that qualifies. In July alone, 1.25 million millions were served in geographic areas with no eligibility or at non-eligible sites in geographic areas that had pockets of eligibility.
 - Implementing targeted outreach can aid in reaching vulnerable families and those disproportionately affected by job loss, particularly service workers and essential workers.
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2. Improve access and reach of USDA summer feeding programs permanently by maintaining critical flexibilities post COVID-19

- The comparison above between summers 2019 and 2020 demonstrates how access was greatly expanded in 2020 by removing federal requirements such as area-eligibility and non-congregate feeding
- Even with area-eligibility waived, the vast majority (85%) of meals continued to be served in communities containing area-eligibility, while also improving equity by providing access to low-income children in non-eligible communities. It is critical to maintain this level of access beyond the pandemic so that more children have access to vital summer nourishment

3. Schools must be provided with more funding and support to strengthen their capacity to feed children and their families, improve gaps in access, and recoup losses from the pandemic

- With the rapidly rising rates of unemployment, schools, sponsors and other community organizations have all played a critical role in addressing the rising rates of food insecurity and must be provided with more financial support to improve their reach and gaps in access. Grants and donors have assisted both schools and community organizations in defraying some of the costs, however, many meal providers across the state still urgently need additional funding to cover the expenses that incurred during the pandemic.
- The drastic increase in participation and number of meals served also came significant un-reimbursed or unanticipated costs because schools and sponsors have had to pay additional staff, funnel resources to support logistics and operations of distributing meals through pick-up or through delivery systems in bulk delivery systems.
- The federal reimbursement dollars help ensure that schools can continue to operate the federal child nutrition programs in a moment of unprecedented financial losses.

4. Adopt a permanent universal school meal system

- Universal meals have been key in providing nutrition to children during the pandemic. Ensuring that all students regardless of family income level get two free, healthy meals every school day beyond the pandemic would help give children the tools that they need to succeed. Adopting a universal school meal system would not only improve childhood food security, it would reduce burdens on school food service programs, reduce stigma among those who typically participate in school meals and increase revenue within schools.
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- Universal meals can help remove stigma from children participating in the program, provide equitable access to healthy meals, and remove discriminatory practices schools may take to feed children who cannot pay.
 - Universal meals ensure that children whose family's income teeters on the edge of eligibility receive meals whether or not they qualify by the federal metric. Due to the current state of the economy caused by the pandemic, more children will likely be eligible for free meals this upcoming school year, however, families in this category may have never navigated federal nutrition programs or understand how to apply.
 - Universal meal programs reduce administrative burdens on school nutrition directors and their staff, increase revenue and provide a steady budget. This allows programs to focus on menu diversification, nutritional quality and feeding children healthy meals .
 - School nutrition staff interviewed indicated they could see elements of the pandemic response be included in normal programming. This could include sending breakfast home the night before or allowing children to take home after school snacks rather than having to eat them in a congregate setting.

Without substantial effort to prioritize the nutritional needs of children in Massachusetts during the pandemic, children's health and development remains at risk. Taking these steps now will address systemic weaknesses of traditional summer programs that could steer more innovative, resilient, and successful future programs. The flexibilities discussed in this report have helped in meeting the needs of children during the pandemic and if continued, could help that will meet the needs of children during out of school times, including the summer, school closures such as breaks, and any other future crisis.



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FIGURES

Figure 1: Hoosac Valley Bus Routes; CNOP

Figure 2: Find a Meal Site Map; CNOP

Figure 3: Find a Meal Site Map; CNOP

Figure 4: Franklin County Technical Bus Routes; Photograph. Franklin Tech Cafeteria. Instagram. 3 September 2020. https://www.instagram.com/p/CErqF-qla7Q/?utm_source=ig_web_copy_link.

Figure 5: Cambridge Public Schools 30,000 meals; Photograph. Cambridge Public Schools. Instagram. 1 May 2020. https://www.instagram.com/p/B_pgwqFgHYD/?utm_source=ig_web_copy_link

Figure 6: Marlborough example meal; Photograph. Marlborough Public Schools. Facebook. 11 December 2020. <https://www.facebook.com/MarlboroughPublicSchools/photos/1437106663151044>

Figure 7: Power Packs at SLRD; Photograph. SLRHS Lakers. Twitter. 8 May 2020. https://twitter.com/SL_Assist_Super/status/1258855863193919489/photo/1

Figure 8: Boston YMCA food boxes; Wallau, R. (2020, December 21). Northeastern alum Wendy Zinn distributes meals to the pod learning group YMCA of Greater Boston on Huntington Ave. Retrieved from <https://news.northeastern.edu/2020/12/21/alum-and-ymca-executive-helps-distribute-more-than-3m-meals-to-families-in-need-during-the-covid-19-pandemic/>

Figure 9: Cambridge apartments; Versoy, B. (2020, May 27). N early May, Nancy Wyse, Family Liaison handed out books and meals at the Rindge Avenue Apartments in Cambridge. Retrieved from <https://www.thecrimson.com/article/2020/5/27/commencement-2020-schools/>

Figure 10: Gratitude from families in Waltham; Photograph. Waltham School Nutrition. Facebook. 27 April 2020. <https://www.facebook.com/WalthamSchoolNutrition/photos/1134541783553249>

Figure 11: Barnstable School Meal Heroes; Photograph. Barnstable Public Schools. Facebook. 1 May 2020. https://m.facebook.com/BarnstablePublicSchools/photos/a.375202512920682/929877724119822/?type=3&source=48&__tn__=EHH-R
