



# Strategies and Challenges in Feeding Out-of-School Students

## An Examination of School District Responses to the COVID-19 Pandemic

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With school districts across the country shuttered as a result of the COVID-19 pandemic, states and localities are urgently trying to determine new ways to provide nutritious meals to low-income students and their families. The United States' primary child nutrition programs are not designed to be emergency feeding systems but rather to provide free and reduced-price nutritious meals to students through the school system. Now, however, many school districts have become emergency community feeding centers for students (and in some notable cases their families) and will do so for an unknown length of time and with budgets that have been stretched increasingly thin. All of this is occurring under the cloud of a disease that has killed more than 43,000 Americans since the end of February.<sup>1</sup>

This brief examines the current landscape of state and federal policy changes, the unique challenges the COVID-19 pandemic is forcing school districts to navigate, the variety of models districts are currently using to deliver meals to students, and the situation's implications for policy changes or future emergencies.

This brief relies on communication with the working groups of critical school districts across the nation, district websites and publicly available information, and nonprofit groups involved in tracking pandemic responses across the country. We present five main findings:

- School meals are a critical part of children's nutrition system, and without finding ways to replace this infrastructure as schools close, children are at risk of missing meals. Sudden school closures have also put enormous pressure on school districts to adopt different meal delivery strategies.
- The US Department of Agriculture (USDA) has introduced waivers to ease some of the barriers preventing schools from distributing meals most effectively and efficiently, and although take-up of those waivers was initially slow and uneven across states, nearly every state has taken up

many of the available options. Interpreting the waivers can be challenging because the states must decipher the different rules, regulations, and details that may or may not apply to their communities and needs. For example, waivers have been issued for schools to provide food in bulk but only “as long as individual meals are easily identifiable as a reimbursable meal.”<sup>2</sup>

- Current strategies adopted by districts are wide ranging and have included Grab and Go service, use of community hubs, bus route models, partnership models for home delivery, and various ways of expanding programming.
- Distribution efforts have incurred additional costs, such as for bags and other necessary materials, delivery and labor, storage space for food items, and personal protective equipment (PPE) for staff, all of which are not typically accounted for in child nutrition program reimbursement rates. This has strained districts’ ability to cover the costs of some distributions, requiring them to tap other school operational funds in the short term and turn to donations and fundraisers to support operations. The Urban School Food Alliance, for example, reports that some large metropolitan school districts are incurring costs in the realm of \$300,000 a week not covered by current reimbursement rates.<sup>3</sup> These costs include covering meals for parents, paying additional wages to staff who remain on front lines, and renting additional refrigeration space.
- As summer approaches, schools face critical questions about how to sustain distribution efforts over time. Because of the pandemic, districts have had to manage high volumes of meals for multiday distributions, and staff strain will only become more pronounced as time goes on. Policymakers should be thinking about additional methods, such as pandemic electronic benefits and online orders through the Supplemental Nutrition Assistance Program, that could complement current alternatives, especially in the long run.

## Background

The USDA Food and Nutrition Service (FNS) administers 15 federal nutrition-assistance programs across the country. Two programs, 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. 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.<sup>4</sup> With the COVID-19 pandemic causing school closures, these programs are no longer accessible in their usual format, and many school districts across the country are continuing to provide food to low-income students and their families through new approaches and delivery mechanisms. Many districts are using the Summer Food Service Program (SFSP) and the Seamless Summer Option (SSO), which are typically used to continue serving meals to children during unanticipated school closures.<sup>5</sup> As with their usual operations, SFSP and SSO sites receive full reimbursement for providing free meals to all children age 18 and under. Some districts are also utilizing the At-Risk Afterschool Meals component of the Child and Adult Care Food Program, which allows after-school centers to continue serving free meals to children during unanticipated school closures.

Federal school meal programs are governed by regulatory requirements and reimbursement mechanisms that assume children are typically consuming individual meals at a physical site and at a prescribed mealtime. School closures and stay-at-home orders in many areas of the US have prompted school districts to quickly innovate to provide meal resources that can be consumed at home. To date, 42 states, Puerto Rico, and the District of Columbia have issued stay-at-home orders and required or recommended that schools close.<sup>6</sup> Nearly all public and private schools across the country have closed (at least 124,000 of an approximate 132,000), and nearly all students have been affected (at least 55.1 million of 56.6 million).<sup>7</sup>

This rapid response has necessitated basic waiver flexibilities from some core program requirements and an iteration of strategies as districts struggle with the need to minimize contact between parents/caregivers and staff. These new strategies have led to new and often higher costs to feed students than what schools currently account for in the per meal reimbursement funding structure they ordinarily use for the NSLP and SBP. This structure makes it difficult to compensate for additional and new costs (such as hazard pay, packaging materials, and delivery along bus routes) and, until recently, had made it difficult to make bulk purchases of food. Further, staffing challenges amid a public health crisis are widespread and pose an important challenge to sustainability for many operations. For example, many school and program staff members are increasingly worried about exposure to the novel coronavirus should they come into work, and demand at many sites outpaces what staff can maintain over time.<sup>8</sup>

The crisis has also caused unemployment to surge to unprecedented levels, especially in some specific industries (e.g., hospitality and leisure). Parents and caregivers who have been laid off from their jobs or had their work hours reduced face an additional financial barrier to providing meals for their children. As a result, many local officials are asking school districts to help feed families. In New York City, for example, 400 locations across the city, most of which are public schools, have been providing three free meals a day to all New Yorkers since April 3.<sup>9</sup>

Because the costs of parent/caregiver meals are not reimbursed under the existing federal nutrition program, helping entire households requires other funding sources or additional food donations. For example, some school districts have relied on donations from nonprofit organizations such as the Red Cross, private companies such as Dole Packaged Foods, and fundraisers or telethons to increase their capacity to serve students and their families.

To assess current flexibilities, challenges, and local and federal policies, we use information from a variety of sources. Nationwide statistics on nutrition programs and the federal government's response to the pandemic are made available by the USDA FNS. To describe the scope of models that districts have adopted during the pandemic, we have drawn upon a wide array of sources including school district websites and media reports. We have also collected information about different programs and approaches from advocacy and nonprofit groups, such as the Food Research and Action Center, the Urban School Food Alliance, and Share Our Strength, many of which were generous enough to speak to us and review draft portions of this brief. We have also collected information on more than 100 school districts around the country by combining a public list from the Food Research and Action Center with websites, emails, and text messages shared through an informal request on Twitter.<sup>10</sup> We also collected direct accounts (e.g., emails, phone calls, and social media posts) from parents and school district personnel who we were connected with or who contacted us directly.

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## BOX 1

### Primer on Primary Child Nutrition Programs

The federal government administers five child nutrition programs: the NSLP, the SBP, the SFSP, the Child and Adult Care Food Program, and the Special Milk Program.

The NSLP and SBP enable schools to, respectively, provide free or reduced-price lunch and breakfast each day. Schools can apply to their governing state agency to provide the SSO through the NSLP or SBP, which allows school food authorities to streamline the provision of meals to all children age 18 and under from low-income areas. Further, the SFSP provides meals to children when school is not in session; the Child and Adult Care Food Program provides meals to children, older adults, and people with disabilities; and the Special Milk Program provides milk to children who do not participate in other federal meal service programs.<sup>a</sup>

Eligibility for these programs is based on a student's household income and family size. Children living with families with incomes at or below 130 percent of the federal poverty level (currently \$26,200 for a family of four) are eligible for free meals, and those with incomes between 130 and 185 percent of the federal poverty level are eligible for reduced-price meals. Children automatically qualify for free meals if their household is identified as participating in the Supplemental Nutrition Assistance Program (SNAP), and they may be matched through other programs, such as the Temporary Assistance for Needy Families cash assistance program or the Food Distribution Program on Indian Reservations. Some states also directly certify, through an administrative data link, students participating in Medicaid.<sup>b</sup> Homeless, foster, and migrant children, as well as those participating in Head Start, may also be deemed eligible.<sup>c</sup>

Schools and school districts that have at least 40 percent of students deemed automatically eligible for free lunch may participate in the Community Eligibility Provision (CEP), which allows schools to serve universal free meals without collecting household applications. CEP allowed more than 13.6 million students in more than 28,000 schools to receive free lunch in the 2018–19 school year (Maurice et al. 2019).

FNS also administers SNAP, the nation's largest food and nutrition program, providing benefits to more than 35 million people in 2019 at a total cost of more than \$60 billion. The Coronavirus Aid, Relief, and Economic Security Act, which Congress passed and President Trump signed into law on March 27, 2020, is a \$2.3 trillion package that raises SNAP's appropriation by \$15.5 billion to cover the anticipated rise in SNAP caseloads.<sup>e</sup> There is some discussion that future legislation should include increases to SNAP benefit amounts and expanded eligibility rules.<sup>f</sup>

<sup>a</sup> For more information, see “[Child Nutrition Programs](#),” US Department of Agriculture, accessed April 17, 2020.

<sup>b</sup> These states are California, Connecticut, Florida, Illinois, Indiana, Kentucky, Massachusetts, Nebraska, Nevada, New York, Pennsylvania, Utah, Virginia, Washington, West Virginia, and Wisconsin. For more, see Blagg, Rainer, and Waxman (2019).

<sup>c</sup> “[School Meal Eligibility and Reimbursements](#),” Food Research and Action Center, accessed April 17, 2020.

<sup>e</sup> The act also includes \$100 million in spending for food distribution programs on Indian reservations and another \$200 million for future nutrition assistance to the Commonwealth of the Northern Mariana Islands, Puerto Rico, and American Samoa. See S.3548, “[CARES Act](#),” 116th Cong. (2020).

<sup>f</sup> See Dottie Rosenbaum, “[Latest Coronavirus Response Package Doesn't Boost SNAP—the Next One Should](#),” Center for Budget and Policy Priorities, March 27, 2020.

All of this information was collected quickly, and we do not consider it a comprehensive review of all the options and procedures taking place across the country. But the information in this brief is the most up-to-date information available, and we feel it gives a broad view of the challenges facing districts, students, and the nation. Given the urgent need and fluid nature of the pandemic, we feel it important to share what we have learned.

Going forward, school districts and local governments should try to collect as much data as feasible under the challenging circumstances to better understand the crisis and propose solutions. In particular, the number of students and families who obtain meals, the number of nonstudents or families not associated with a student who obtain meals, additional costs associated with expanded food delivery (such as for refrigeration, delivery, and packaging), changes in the types of food they provide, and changes in the number of staff members or in staff salaries would all be useful for policymakers to know. If districts are able to document these elements, federal, state and local policymakers will be better able to respond to their ongoing needs, including new needs for funding not currently accounted for in school meal reimbursement rates.

## Current Flexibilities Provided by the USDA in Administering School Meals Programs

In response to unprecedented challenges to providing school meals through traditional mechanisms in the current public health emergency, the USDA has begun giving states flexibility to adapt their normal operating procedures. These waivers are intended to make it easier for school districts to support children's access to healthy meals while protecting meal providers and recipients from exposure to the novel coronavirus. Nationwide waivers have been granted to allow school districts to serve meals outside of standard meal times and in group or after-school settings. Further state-level flexibilities, which some states have taken up, include provisions such as the ability to (a) waive the meal pattern requirements specifying the types of food required for a nutritious meal; (b) allow parents/guardians to pick up meals for their student without him or her present; (c) extend deadlines for districts to elect for the community eligibility provision; and (d) make monitoring requirements more flexible and to extend reporting requirements for all state agencies, school food authorities, and organizations.<sup>11</sup> Districts are still submitting additional requests, and it is unclear what waivers may be allowed or disallowed. For more about these flexibilities, see box 2.

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## BOX 2

### Waiver Flexibilities

The USDA has announced new waivers in the wake of the COVID-19 pandemic to allow flexibility in the child nutrition programs (these announcements and more information can be found on the FNS website).<sup>a</sup>

To date, nine nationwide waivers have been made available to states by the USDA. These waivers are automatically applied to states that elect to use them and are effective immediately (states needed to inform USDA that they planned to elect these waivers but did not need to apply):

- **Meal Times Waiver:** Eliminates any federal restrictions about meal times or spacing between meals. All states have taken up this option.
- **Non-congregate Feeding Waiver:** Allows states to serve meals outside the standard group setting. All states have taken up this option.
- **Meal Pattern Waiver:** Waives the requirement that states serve meals that meet the meal pattern requirements. Meal pattern requirements specify the types of food that make up a nutritious meal, such as fruits, vegetables, grains, and dairy. This waiver requires districts to demonstrate hardship getting certain products, so this flexibility has generally been restricted to operators experiencing supply chain issues. All states have taken up this option.
- **Afterschool Activity Waiver:** Allows states to serve after-school snacks and meals outside of the standard after-school setting and without requiring other activities to be made available. Except for Arkansas, every state and Washington, DC, has taken up this option.
- **Parent/Guardian Meal Pick-Up Waiver:** Allows parents/guardians to pick up meals for their children without the student needing to be present. A total of 41 states, including Washington, DC, have taken up this waiver.
- **Community Eligibility Provision Waiver:** Extends deadlines for CEP election, notification, and reporting deadlines. CEP is an option that allows the country's highest-poverty schools and districts to serve meals without collecting individual applications from student's families. Forty-seven states, including Washington, DC, have taken up this waiver.
- **Waivers of Child Nutrition Monitoring:** Provides flexibilities to certain on-site monitoring requirements for child nutrition programs. This program allows states to waive the on-site portion of these monitoring activities as long as they can, to the maximum extent practicable, continue them off site. Except for Arkansas, every state and Washington, DC, has taken up this option.
- **60-Day Reporting Waiver:** Extends the deadline for all state agencies, school food authorities, and organizations beyond the standard 60 days for the months of January and February 2020. Forty-five states have taken up this waiver.
- **Area Eligibility Waiver:** Waives the requirement that summer meals program (SFSP/SSO) sponsors be limited to serving meals in areas where at least half of the children live in low-income households. Except for Illinois, every state and Washington, DC, has taken up this option.

Most states have elected to use all of these waivers. All 50 states and the District of Columbia have been approved to use the Meal Times Waiver, the Non-congregate Feeding Waiver, and the Meal Pattern Waiver. Figure 1 shows the states that have elected to use the six waivers that have not yet been universally adopted.

Once waivers are granted, districts must interact with both states and the USDA to iron out interpretations, and it can be challenging for districts to obtain clarification regarding what is allowable.

FIGURE 1

**States That Have Been Approved for Waivers for Child Nutrition Programs**

*Waivers that have not yet been universally adopted by all states*

**Afterschool Activity Waiver**

(All states except Arkansas)



**Nationwide Parent/Guardian Pickup Waiver**

(All states except for Alaska)



**Nationwide Community Eligibility Provision (CEP) Waiver**

(47 states)



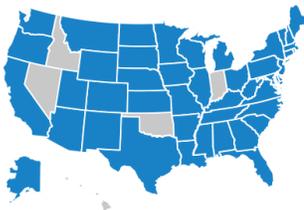
**Nationwide Waivers of Child Nutrition Monitoring**

(All states except for Arkansas)



**Nationwide 60-Day Reporting Waiver**

(45 states)



**Area Eligibility Waiver**

(All states except for Illinois)



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Source: USDA FNS website.

Notes: Blue shades denote states that have claimed the FNS waiver. Data as of April 20, 2020.

<sup>a</sup>“FNS Response to COVID-19,” USDA FNS, accessed April 20, 2020, <https://www.fns.usda.gov/disaster/pandemic/covid-19>.

## New Challenges

In part, these waivers respond to widespread issues that districts are grappling with as they try to respond to students' needs. As districts around the country debate how and where to provide meals to students, they must also balance cost concerns, health concerns, and whether strategies are sustainable given that the length of closures remains uncertain and the need to continue serving families into the summer is becoming increasingly likely.

The following are some of the major considerations facing districts:

- **Reimbursement challenges.** What services can and cannot be reimbursed in support of efficiently providing meals to students who need them?

Under typical NSLP and SBP rules, schools are reimbursed at a particular rate for each meal served in a school lunch or breakfast setting. The per meal reimbursement mechanism traditionally requires staff to keep close track of how many individual meal equivalents are provided to students. This can be particularly challenging in the flexible distribution models now in use (e.g., documenting when there are multiple children in a household is now more difficult). The USDA is now allowing districts to provide food in bulk, and districts are increasingly seeking to do so in order to provide several days' worth of meals in a single distribution. Doing so reduces the burden on and risk to staff and parents, but the USDA has stipulated in specific guidance that this is only allowable when "individual meals are easily identifiable as a reimbursable meal."<sup>12</sup>

Many schools are now serving meals through the SFSP or SSO programs, so they only need to track the number of total meals rather than meals by child. Even so, reimbursement rates for the SFSP or SSO programs may not be high enough to support the cost of large-scale distribution efforts that require additional supports not required for in-school meal provision. For example, packaging materials, such as plastic or paper bags and boxes, are now an integral part of supplying take-home meals to students, and greater staff labor is needed to package and distribute foods. Further, mounting effective and sustainable efforts may require substantial expenses, such as extra storage and refrigeration space at distribution points, PPE to prevent the spread of disease, and additional transportation and delivery (as some districts have begun using buses to deliver meals to students at home). The Urban School Food Alliance, for example, reports that some large metropolitan school districts are incurring costs in the realm of \$300,000 a week not covered by current reimbursement rates.<sup>13</sup> These costs include covering meals for parents, paying additional wages to staff who remain on front lines, and renting additional refrigeration space.

- **Supply chain disruptions for food and supplies.** Are foods available in the right quantities for districts?

To qualify for reimbursement, school meals are required to meet certain nutritional standards. In the wake of the COVID-19 pandemic, supply chains (the sequence involved in the production

and distribution of goods) have been disrupted, meaning districts across the country are facing challenges sourcing what they need. For example, shelf-stable foods and milk are now in high demand, so some districts have difficulty acquiring those items at an affordable price. Conversely, some parts of the country have a growing excess of fresh produce because demand for dine-in restaurants and other institutional providers is declining, but the logistics of including produce in manageable amounts in school distributions may be challenging. Other items, such as paper bags and PPE, are also in short supply but are increasingly necessary for distribution and staff safety. School districts have had to pursue new sourcing relationships and are now competing with other sectors for adequate amounts of PPE. Facilitating new sourcing strategies and implementing policy changes (e.g., waiver flexibility, adaptations that better align with multiday meal provision, and financial and technical assistance) that would support these strategies are critical moving forward.

- **Frequency of food pickup/delivery.** How often are food sites open, or is food delivered?

Our scan suggests that some districts started providing one day's worth of food at a time on a daily schedule, but to protect the health of meal providers and families and reduce the strain on school staff, they have moved to providing multiple days' or an entire week's worth of food on a limited schedule. Many schools in our scan are asking families to pick up their meals at schools or other locations in the community; some are dropping off food on established bus routes or at individual homes. In all cases, districts will need to weigh a variety of considerations: How often (and safely) they can provide staff to prepare and distribute meals; how sustainable (and cost efficient) is delivering meals using school buses; and what meal distribution frequencies will be most useful to families in need? Although some districts may want to move to a weekly distribution or delivery, they may not be able to satisfy the demand in a single day, or they might not have enough storage capacity to deliver so infrequently.

- **Timing of food pickup/delivery.** During what times of day are families able to pick up meals from food sites or have meals delivered?

School districts must decide what time to make food available for pickup and delivery. Most school districts in our scan offer a two- or three-hour pickup window in the middle of the day. A smaller number of districts offer several pickup windows or have an early-morning window that begins before the work day (which may make pickup easier for adults who are still working). When determining the length and timing of meal pickup windows, districts must weigh the potential exposure of meal providers to the novel coronavirus and the time of day at which families will be most likely to be able to pick up food. On the one hand, limited windows are more manageable for school districts but may be challenging for essential workers whose availability does not align with distribution times. Further, limited windows may also lead to more crowding at sites, putting the public at greater risk or causing traffic problems. On the other hand, using several distribution times to accommodate various schedules may put more demand on school staff and require additional record keeping to ensure households do not receive more than their number of allowable meals each day.

- **Documentation and data collection.** Is registration for meals required?<sup>14</sup> Do students need to be present? Are students or their families required to provide some form of identification?

Many school districts in our scan no longer require students to be present at pickup, and only a few have arranged for any type of separate meal registration program (online or otherwise). Instead, they may require only limited identification be presented by an adult (such as a student identification card, birth certificate, or school enrollment form). These changes have been motivated in part by a desire to minimize physical contact among staff members and families and to safeguard students from unnecessary travel. School districts have attempted to reduce the likelihood of distributing duplicate meals by limiting the number of meals that can be picked up per person or monitoring pickups across several school sites. The major priorities in distribution have been easing access to food for families and minimizing burden on staff.

- **Serving the whole family.** How can districts support students by stabilizing an entire household's food resources?

School meal reimbursement does not cover meals provided to adults and other family members. However, many communities are looking to schools to help address food insecurity in the entire household. Schools serving through SFSP or SSO could serve people with documented disabilities of any age and serve all children. A few districts are going even further, allowing any adult family members living in the same household as an eligible student to also obtain free or reduced-priced meals. In [Fairfax County Public Schools \(FCPS\)](#) in Northern Virginia, for example, adults can obtain meals for \$2 when picking up free student meals. [New York City schools](#) have become front-line organizations to support community food needs—they serve any New Yorker (both adults with no kids and families with children) three free meals a day. To cover the costs of these additional measures, districts are often looking to other governmental sources or to philanthropy.

**Staff health and safety.** How are districts addressing the health and safety of staff members? What happens when COVID-19 infection leads to the closure of a distribution site?

An obvious ongoing concern for districts is the health of staff and communities. Districts have had to roll out new procedures and health precautions to ensure safety in packing and distributing meals. For example, the Austin Independent School District has provided a training video on how to social distance and provide meals safely (in both the curbside and bus delivery models) for school staff.<sup>15</sup> Locating and purchasing PPE is an ongoing challenge for districts. And even with many communities under stay-at-home orders or continuing to social distance, some staff members have contracted COVID-19, and this risk will likely persist in the near future. Some districts have already had to close or shift some distribution sites because staff have become sick with COVID-19 and other staff must quarantine. At least one district has created backup crews so that operations can continue smoothly in case of closure, even if employees must be quarantined. Nevertheless, we have heard that concerns about health risks (and in some cases, worries about a lack of health insurance among staff members and their families) have led to labor shortages in some areas. Hazard pay for workers involved in packing

and distributing meals is being considered in some districts to help maintain staffing, but challenges remain regarding how to pay for extra compensation. Many districts have been paying their entire staff their usual wages whether they work or not, then paying separately for shifts actually worked. Other districts are paying overtime rates to staff involved in food distribution efforts. Either way adds to the financial burden of running school-based child nutrition programs during this pandemic.

- **Communication.** How are districts communicating with students, families, and their communities? How can they keep their stakeholders continuously informed?

Communication with families and communities is key to providing meals to low-income families. Many school districts around the country use a combination of traditional mail, online posts, social media, and text messages to communicate with families. For example, New York City schools are using a texting service as the main vehicle of communication with families. Some districts have also launched online search tools and maps that allow families to see exactly where and at what time food distribution sites are open. In a situation where up-to-date information (such as about food distribution site closings or schedule changes) is paramount, how will districts ensure they are communicating with their stakeholders? The USDA recently launched its own map that allows families to find a feeding site close to them, although information is partial; only 35 states are covered.<sup>16</sup>

The longer the pandemic lasts and the more decisions districts are forced to make, the more important these communication channels become. The iteration of the process also makes communication challenging. For example, many districts are moving toward distributing meals fewer days each week and providing more food at each distribution. As districts have moved beyond short-term spring-break emergency distributions, some districts have added additional sites, closed sites, or ramped up efforts to deliver food to children along bus routes. Although many schools, news outlets, and nonprofit organizations are now providing maps of distribution sites, keeping information current and easily accessible to families remains a challenge.

## Emerging Models

In our scan of school district strategies, we examined a mix of approaches for districts of different sizes across each region of the country. The following summarizes primary models that emerged.

### Grab and Go

The Grab and Go model allows parents and other caregivers to show up at schools or community sites to pick up meals for children. Many districts are allowing parents or caregivers to pick up food without the child being present, and some appear to be minimizing requests for identification (figure 1). Some districts are already moving from daily meal distribution to offering two or three pickup days each week and providing packages with several days' worth of food. Some districts, such as the [Kokomo School](#)

[Corporation](#) in Indiana and [Abbeville County School District](#) in North Carolina, are offering pickup on only one day but including five days' worth of meals.<sup>17</sup>

The [Chicago Public Schools](#) system is a representative example of the Grab and Go model. The district, which is the second largest in the nation and has a student body of about 373,700, set up 136 distribution sites across the city during spring break.<sup>18</sup> That number rose to 304 sites after the district shifted to remote learning on April 13 following their spring break. Grab and Go locations are a mix of elementary and high schools across the city. Families can pick up three days' worth of meals for every child in their household, and all of the sites are open from Monday to Friday from 9 a.m. to 1 p.m. Students do not need to be present to receive meals, and parents or caregivers may pick up meals on behalf of the students in their household. Meals are also available to all children in the household, not just those currently enrolled in school (i.e., younger children are included).

Although this is by far the most common model of food distribution we reviewed in our scan, a few important questions have emerged regarding this version of distribution:

- a. **Neighborhood accessibility.** Are distribution sites adequately dispersed across a given district to maximize accessibility? Although some locations may have more storage capacity than others and might be chosen for logistical reasons, these considerations must be balanced with a desire to maximize the number of sites and address barriers for families traveling to sites.
- b. **Pick-up method.** Do families stay in their cars and have food handed to them through the window, or do they walk up or queue at a location? There are examples of districts using each type of strategy. In areas where vehicle drive-through is an option, curbside pickup may better protect individual safety, but not all families may have access to cars.
- c. **Staffing demands.** As time goes on, staffing Grab and Go models is likely to become more difficult. Districts are currently relying on staff to perform a range of activities, including packing boxes, facilitating distributions, and communicating with families. The sustainability of this system without more resources, especially given health and safety concerns, may become an issue in the near future.

## Use of Community Hubs

Although many Grab and Go sites are located at schools, several districts have also made attempts to use community hubs to better reach people in need. For example, [Boston Public Schools](#) not only distributes food at some school locations, it has also expanded its meals service to reach more youth across the city through other service sites, such as YMCA centers, Boston Centers for Family and Youth, Boys and Girls Clubs, churches, and other community centers. Boston Public Schools has also posted an interactive map of all sites and hours on its website, noting that schedules and sites might change. The [Grandview C-4 School District](#) in Missouri has also taken this approach, expanding distributions to all major apartment complexes in the area.

## Bus Routes Model

Some districts are adapting bus routes to deliver food to children. [Roseville Area Schools](#), located in the suburbs of Minneapolis–St. Paul in Minnesota, is distributing meals at 20 sites along its highest-need bus routes. [Pasco County Schools](#) outside of Tampa, Florida, is delivering five days' worth of meals to 15 neighborhood bus stops every Tuesday, where buses remain for 30 minutes. In the [Austin Independent School District](#) in Texas, school buses are being used to deliver meals at more than 50 locations. Buses visit each of the sites for 15 to 20 minutes, and families are being encouraged to arrive at the site early and can use the [WheresTheBus](#) website to track bus locations. In that district, home to more than 80,000 children, each child may receive one breakfast and one lunch meal each day.

Delivering meals at regular bus stops may be especially convenient because they arrive at points that children and families are already familiar with or are already used to visiting daily. Depending on how school districts pay their bus drivers, this approach may add costs to the school's budget, but it also offers ways to retain staff who might otherwise be furloughed. In addition to the districts just mentioned, we identified at least 11 other districts using buses to deliver meals. These models may not necessarily stop at regular pickup sites and instead may be using adapted or consolidated routes.

## Partnership Model to Provide Home Delivery

Some rural districts are partnering with nonprofits or other vendors to supply children with home-delivered school meals. A national program, [Emergency Meals-to-You](#) (through a partnership with the Baylor University Collaborative on Hunger and Poverty, McLane Global, PepsiCo, and others) was recently launched to deliver weekly meals to students in school districts that apply for the program. The program focuses on school districts that are closed for at least a month, located in rural areas, and are SFSP-area eligible.<sup>19</sup> Districts in some of the more rural parts of the country are also using a home delivery to make meals more accessible. [Wyoming City Schools](#) outside Cincinnati, Ohio (home to about 2,000 students), is partnering with local organizations to deliver meals to students' homes. Breakfasts and lunches for five days are delivered to the front door of students' homes each Tuesday. Other efforts have focused on home delivery for specific populations. For example, the New York City Department of Education has been delivering food to medically fragile children across all five boroughs through a partnership with DoorDash.<sup>20</sup>

## Expanding Programming

In some cases, districts are using innovative approaches to deliver meals to students in more customized ways during the COVID-19 pandemic. For example, several school districts are pairing food delivery with instructional support (e.g., [Milwaukee Public Schools in Wisconsin](#)) and using online preordering systems (e.g., [Northshore School District in Washington](#)).

Partnerships between districts, nonprofits, and private-sector companies is another way to provide food to children during the pandemic. [GENYouth](#), a nonprofit organization that convenes a network of private and public partners, is working with local dairy councils and the National Football League to

provide COVID-19 Emergency School Nutrition Funding grants of up to \$3,000 per school to purchase meal distribution supplies, delivery materials, and PPE for staff.<sup>21</sup>

Although some districts are already providing food to adults as well as kids (e.g., Fairfax County Public Schools and New York City Public Schools), thinking more broadly will only be more critical as time goes on. In particular, districts may need to start considering how to provide expanded meal service into the summer or on weekends or start including other supplies, such as toilet paper and toiletries. One possible approach is to leverage the infrastructure of other existing federal nutrition programs (as one example, see box 3 on the Pandemic Electronic Benefit Transfer program). As leaders expand the length of local stay-at-home orders and school closures, districts and localities will be forced to make important staffing and budgetary decisions.

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### BOX 3

#### **Pandemic Electronic Benefit Transfer**

The Pandemic Electronic Benefit Transfer (P-EBT) program was originally authorized in the Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2010 in response to the 2009 swine flu pandemic.<sup>a</sup> It was recently reauthorized in the Families First Coronavirus Act, passed by Congress and signed by the president on March 18, 2020. The program enables states to enact emergency standards of eligibility for children who have lost access to free- or reduced-price meals because their schools closed for at least five consecutive days in response to the COVID-19 pandemic.

Under the program, households will receive an allotment of federal funds equal to the daily reimbursement amount for free breakfast and lunch in the state. In the 2019–20 school year, the maximum reimbursement rate for households in the contiguous US was \$3.58 for free lunches and \$2.20 for free breakfasts. Thus, households for whom schools are closed for 20 days in a month would receive a total benefit of \$115.60 per child.

For households already receiving SNAP benefits, states are able to use existing case information and load benefits to the household's existing EBT card. (EBT is an electronic system that allows the government to transfer SNAP or other benefits to a physical card that recipients can use to pay for approved products.) States will need to demonstrate they can process new applications and have a sufficient number of EBT cards on stock to issue to households not receiving SNAP.

To date, six states—Arizona, Illinois, Massachusetts, Michigan, North Carolina, and Rhode Island—have been approved to implement the P-EBT program. Four other states—Kansas, Missouri, New York, and Oregon—have applied (see figure 2).

Dottie Rosenbaum of the Center on Budget and Policy Priorities has suggested that using P-EBT to provide monetary benefits to needy families is a way to either complement the models listed above or even phase them out over time, especially as health concerns may make Grab and Go sites more difficult to sustain in the longer term.<sup>b</sup> P-EBT may be a vital strategy in many areas, and it has several advantages. It allows families to shop for their specific food needs, and redeeming benefits can support local food stores. Unfortunately, it is currently available in only a limited number of states.

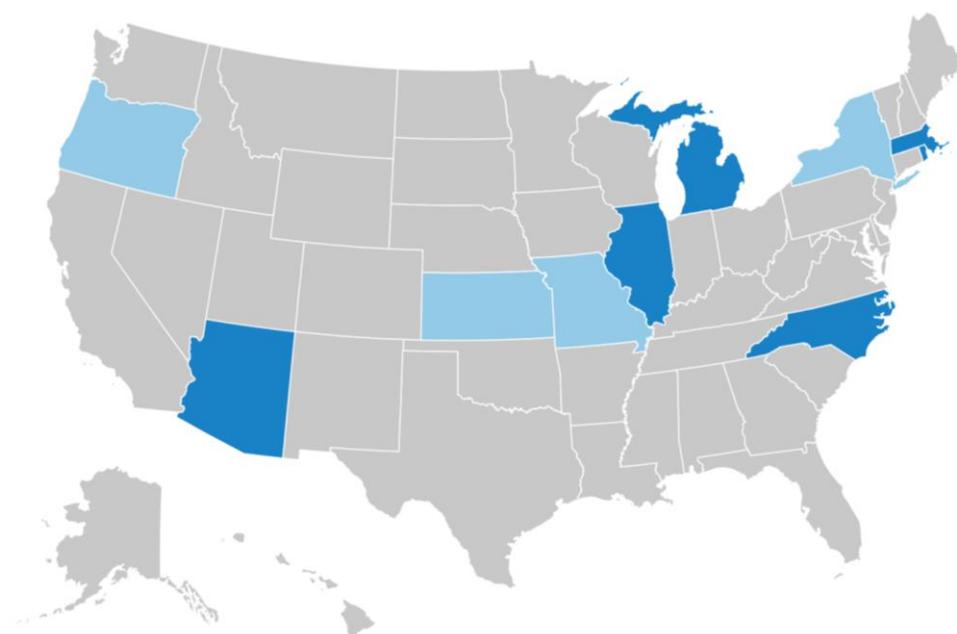
Many SNAP participants lack access to online ordering and delivery using SNAP benefits, processes which have become increasingly critical during the pandemic. A limited number of states (Alabama, Iowa, Nebraska, New York, Oregon, and Washington) currently allow online EBT purchases from only a select number of retailers (several other states are expected to implement online purchasing in the next few

months). Even for people who have online-access SNAP benefits, those benefits cannot be used to pay for delivery fees. Further, people making trips to the grocery store to use P-EBT benefits face continued risk of exposure to the novel coronavirus. Those trips may also require child care or other services; Grab and Go curbside pickup or home-delivered food may entail more limited exposure. SNAP and other programs can and should be used to help alleviate hunger around the country during the pandemic, and the models discussed here may have an important role to play, especially in the near term.

**FIGURE 2**

**Pandemic Electronic Benefit Transfer**

*Six states approved in dark blue; four states pending in light blue*



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**Source:** USDA FNS website.

**Notes:** Data as of April 20, 2020.

<sup>a</sup> See 746 of Public Law 111-80, the [Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010](#) (signed October 21, 2009).

<sup>b</sup> Dottie Rosenbaum, “[Latest Coronavirus Response Package Doesn’t Boost SNAP—the Next One Should](#),” Center for Budget and Policy Priorities blog, March 27, 2020.

## Implications for Policy

As the country’s approach to the COVID-19 pandemic evolves, the approach of different school districts is also shifting. What some might have originally thought a brief closure has, for many districts around the country, extended to several weeks. As of mid-April, 25 states and three territories had indicated they would be closed for the remainder of the school year.<sup>22</sup> Although providing daily weekday meals may have been a reasonable approach for a short period, daily meal distribution for an

extended period has proven costly and logistically challenging. An increasing number of districts are instead providing multiple meals on one or two distribution days a week to minimize the risks to staff and families and streamline operations given declining staff resources, and districts are looking for further direction on how summer school sessions may be structured during the pandemic.

With widespread economic disruption leading to rapidly rising unemployment, schools have played a critical role in addressing the high risk of food insecurity in their communities during the crisis. In doing so, they are also incurring significant unreimbursed or unanticipated costs because they have had to increase compensation to retain workers on the front lines and support logistics, such as by bringing in additional refrigerated trucks to manage bulk distributions. Moreover, community leaders in many states have turned to schools to offer meals to parents as an important strategy for reaching high-risk families under stay-at-home orders. In some areas, donors have helped defray these costs, but many school districts urgently need to find ways to cover these unreimbursed expenses.

Policymakers at the federal, state, and local levels need to recognize the mounting strain on school districts and provide additional support for both short- and long-term challenges. Here are some key priorities they can consider:

- Help school districts recoup unreimbursed costs for the current emergency response.
- Identify additional flexible funding to support intermittent closure strategies and equip schools to pursue multiple strategies as circumstances evolve.<sup>23</sup>
- Act swiftly to build a nationwide strategy to support children during the summer, recognizing that summer school sessions may be disrupted or held remotely. The existing SFSP, which only reaches a fraction of students typically receiving free and reduced-price meals during the school year, has been heavily reliant on congregate meal strategies that may need to be retooled (FRAC 2019). A robust summer strategy may include extending current emergency responses offered by school districts, implementing wider use of Pandemic EBT, and supplementing those services with home-delivered food in areas with fewer shopping options and/or extensive continued stay-at-home orders.
- Boost all SNAP benefits. This was a proven method used during the Great Recession to reach vulnerable families and reduce food insecurity among people across all age groups.<sup>24</sup>
- Ensure that families that also have toddlers and young non-school-age children can access other supports easily, including the Special Supplemental Nutrition Program for Women, Infants, and Children program, which provides food assistance to children under age 5.

## Conclusion

Conditions and programmatic responses on the ground continue to evolve rapidly, and uncertainties and limited information about how districts are faring persist. Policymakers at the federal, state, and local levels need to stay closely attuned to the needs of school districts and families with children.

Moving forward, how creative schools and districts can get will depend on waiver guidance from the USDA, identification of funding for added expenses, and the ability to maintain staffing under increasingly challenging circumstances. For example, sourcing and distributing food for multiday use may require new flexibility from various school meal requirements and per meal reimbursement constraints. Staffing issues are also likely to be exacerbated in the coming weeks given growing staff needs for PPE, concerns about the risks of coming out to work, a lack of hazard pay for staff, and burnout. Efforts to switch to more bulk food distribution, to create partnerships with nonprofits or other organizations, and to increase awareness about the challenges families are facing (such as how to ensure food delivery if parents get sick and how to pair efforts to feed children with helping parents in need) are likely to gain more traction as time goes on. School districts and local and state governments also need to consider the longer-term impacts their efforts may have going into the 2020–21 school year. With children out of school for months, overextended staff and administrators, tight budgets (including many city and local budgets), and an unknown outlook for the spread of COVID-19, robust and flexible systems to assist school-age children and their families should be a priority for the foreseeable future.

## Notes

- <sup>1</sup> Estimate from “Johns Hopkins University CSSE COVID-19 Dashboard,” accessed April 20, 2020, <https://www.arcgis.com/apps/opsdashboard/index.html#/85320e2ea5424dfaa75ae62e5c06e61>.
- <sup>2</sup> “Child Nutrition Program Nationwide Waivers: Questions and Answers,” USDA, April 11, 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP13-2020s-a.pdf>.
- <sup>3</sup> Personal communication with Katie Wilson, Executive Director, Urban School Food Alliance, April 16, 2020.
- <sup>4</sup> USDA Food and Nutrition Service, “National School Lunch Program: Participation and Lunches Served,” accessed April 20, 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/slsummar-4.pdf>; FNS, “School Breakfast Program Participation and Meals Served,” accessed April 20, 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/sbsummar-4.pdf>.
- <sup>5</sup> “Meal Service During Unanticipated School Closures,” USDA, accessed April 17, 2020, <https://www.fns.usda.gov/cn/meal-service-during-unanticipated-school-closures>.
- <sup>6</sup> Sarah Mervosh, Denise Lu, and Vanessa Swales, “See Which States and Cities Have Told Residents to Stay at Home,” *New York Times*, April 7, 2020, <https://www.nytimes.com/interactive/2020/us/coronavirus-stay-at-home-order.html>.
- <sup>7</sup> “Map: Coronavirus and School Closures,” *Education Week*, April 19, 2020, <https://www.edweek.org/ew/section/multimedia/map-coronavirus-and-school-closures.html>.
- <sup>8</sup> Jennifer Gaddis and Amy Rosenthal, “Cafeteria Workers Need Support During the COVID-19 Pandemic,” *USA Today*, April 6, 2020, <https://www.usatoday.com/story/opinion/2020/04/05/cafeteria-workers-risking-their-health-feed-vulnerable-students-column/2939584001/>.
- <sup>9</sup> “Free Meals for All New Yorkers Starting Friday; Childcare Programs Expanded,” *NBC New York*, April 3, 2020, <https://www.nbcnewyork.com/news/coronavirus/nyc-set-to-turn-schools-into-childcare-centers-for-kids-of-first-responders-healthcare-workers/2335687/>.
- <sup>10</sup> The tweet received 48 replies and numerous other interactions. See Jon Schwabish (@jschwabish), “If schools in your district are closed but they are still offering free- or reduced-priced meals, can you please let me know? Especially helpful if you have an email or website you can share. Thanks!,” Twitter, April 1, 2020, 9:02 a.m., <https://twitter.com/jschwabish/status/1245335787668897793>.

- <sup>11</sup> USDA Food and Nutrition Service, “FNS Response to COVID-19,” accessed April 16, 2020, <https://www.fns.usda.gov/disaster/pandemic/covid-19>.
- <sup>12</sup> The USDA has provided guidance that indicates existing waivers permit schools to utilize a bulk delivery approach, although there are several challenges to navigate. Specifically, the USDA stated recently that “program operators may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal. When implementing such a delivery mechanism, program operators must: include the required food components in the proper minimum amounts for each reimbursable meal being claimed; must ensure that food items are clearly identifiable as making up reimbursable meals; are strongly encouraged to provide menus with directions indicating which items are to be used for each meal and the portion sizes; should consider whether households have access to refrigeration, stoves, microwaves, etc. when providing food that requires refrigeration or further preparation, such as reheating; and should ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.” See item 18 in “Child Nutrition Program Nationwide Waivers: Questions and Answers,” memo SP 13-2020, CACFP 07-2020, SFSP 06-2020, USDA, April 11, 2020, <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP13-2020s-a.pdf>.
- <sup>13</sup> Personal communication with Katie Wilson Executive Director, Urban School Food Alliance, April 16, 2020.
- <sup>14</sup> Closed enrolled sites would often require “registration” unless the district has an approved plan to target students eligible for free or reduced-price meals. Also, if a school is still serving through NSLP/SBP or if this is a child care provider serving through the Child and Adult Care Food Program, they are limited to serving enrolled children.
- <sup>15</sup> Ryan Cengel, “Starting curb side meal service and bus stop delivery here in Austin tomorrow as “Spring Break” has come to a close. To make sure we serve these meals efficiently and safely we made a training video for our staff for each type of meal service. As always the health and safety of our staff is our #1 priority.” TIPS for School Meals that Rock (public group), Facebook, March 22, 2020, 9:46 p.m., <https://www.facebook.com/groups/177286602996832/permalink/591733494885472/>.
- <sup>16</sup> USDA Food and Nutrition Service, “Find Meals for Kids When Schools are Closed,” accessed April 20, 2020, <https://www.fns.usda.gov/meals4kids>.
- <sup>17</sup> Abbeville County School District – ACSD, “Meals are available at the following locations 12:30 - 1:30: Abbeville High, Cherokee Trail Elementary, Diamond Hill Elementary, Dixie High, John C. Calhoun Elementary, Long Cane Primary, Westwood Elementary, Wright Middle. Meal service dates: Wednesday, April 1st students will receive meals for the remainder of the week. Monday, April 6th students will receive meals for the entire week. Beginning April 13th meals will be available each Monday and Wednesday through April 30th.” April 1, 2020, 10:09 a.m., <https://www.facebook.com/1833779573530773/photos/a.1863625440546186/2574059529502770/>.
- <sup>18</sup> All student counts come from the 2017-2018 Common Core of Data from the National Center for Education Statistics, <https://nces.ed.gov/ccd/>.
- <sup>19</sup> SFSP-eligible areas are meal sites where at least 50 percent of children attending school in that area are eligible for free- or reduced-price school meals. Areas can be defined using school data, census block group data, or census tract data. Area eligibility determinations are redetermined every five years. More information can be found at “About Area Eligibility,” USDA FNS, last updated December 17, 2015, <https://www.fns.usda.gov/cacfp/about-area-eligibility>.
- <sup>20</sup> “Free Meals for All New Yorkers Starting Friday; Childcare Programs Expanded,” *NBC New York*, April 3, 2020, <https://www.nbcnewyork.com/news/coronavirus/nyc-set-to-turn-schools-into-childcare-centers-for-kids-of-first-responders-healthcare-workers/2335687/>.
- <sup>21</sup> “COVID-19 Emergency School Nutrition Funding,” GENYOUth, accessed April 16, 2020, <https://covid-19.genyouthnow.org/>.
- <sup>22</sup> “Map: Coronavirus and School Closures,” *Education Week*, April 19, 2020, <https://www.edweek.org/ew/section/multimedia/map-coronavirus-and-school-closures.html>.
- <sup>23</sup> See FRAC (2020) for examples of flexibility.

<sup>24</sup> See Mark Nord and Mark Prell, “Food Security Improved Following the 2009 ARRA Increase in SNAP Benefits,” US Department of Agriculture, <https://www.ers.usda.gov/publications/pub-details/?pubid=44839>.

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