An Evaluation of the Seamless Waiver in Five School Districts

Final Report

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EXECUTIVE SUMMARY

In 2001, two school districts in California and three in Florida requested a waiver from the U.S. Department of Agriculture (USDA). This waiver would allow the districts to operate summer meal programs through 2004 using rules different from those of the traditional summer feeding program, the Summer Food Service Program (SFSP). This report documents and assesses the innovations that the five districts tried during the first two summers of the waiver.

The SFSP provides funds for organizations to serve free, nutritious meals to low-income children during the summer. School districts are the most common type of organization sponsoring the SFSP, or running it on a day-to-day basis. Because school districts operate food service programs for children throughout the school year, they have extensive experience and infrastructure applicable to running the summer program. SFSP sponsors must comply with detailed rules concerning the administrative and operational aspects of the program. Some of these rules were developed in response to concerns about administrative abuses and inefficiencies in the program during the late 1970s and 1980s.

Recently, nutrition advocates and policymakers have been concerned about low participation rates in the SFSP. The number of children fed through the summer program is low, compared with the number of students receiving meals during the school year through the National School Lunch Program (NSLP). School districts use the NSLP to provide free and reduced-price lunches for children during the school year. They can also use the NSLP during the summer, but only to feed children attending academic summer school.

The waiver, granted by the USDA’s Food and Nutrition Service (FNS), allows school districts to operate a summer feeding program using a combination of SFSP and NSLP rules. For example, under the waiver, SFSP area eligibility guidelines, which concentrate feeding sites in areas with large percentages of low-income children, are maintained. However, NSLP rules replace many of the SFSP rules for running the program on a day-to-day basis.

By substituting the NSLP rules for the detailed SFSP regulations, the waiver is intended to reduce the administrative workload and costs of being an SFSP school district sponsor. The waiver was also designed to facilitate a seamless transition between the school year and summer feeding programs, which normally have different rules and requirements. Therefore, the waiver is called the “Seamless Waiver.” The nutrition advocates, officials, and school administrators who developed the waiver hope that it will influence additional school districts to sponsor summer feeding programs and ongoing school district sponsors to expand their current meal programs. Ultimately, they hope that it may increase the number of children receiving summer meals.

Mathematica Policy Research, Inc. (MPR) received a grant from the David and Lucile Packard Foundation to evaluate the Seamless Waiver in the districts that began using it in 2001. The following key research questions are guiding the evaluation: (1) What are the waiver’s effects on the costs of running the SFSP? (2) What are the effects on the administrative workload of running the program? (3) How do these effects, if they exist, influence participation in
summer feeding? and (4) Are there any unintended consequences of the waiver, such as a decrease in the level of integrity with which the program is run? This report presents findings on the evaluation questions based on the first two years of the waiver in five school districts.

In 2002, FNS made the Seamless Waiver available to school districts nationwide. This report does not include information on the expansion of the waiver. However, MPR conducted a survey of districts sponsoring the waiver in 2002, and we will describe the results of the survey in a forthcoming report.

We obtained the findings presented in this report through site visits, in-person and telephone interviews, and analysis of administrative records. Interviews inform much of the study and were conducted with SFSP officials and advocacy groups, staff members of school districts that operated the Seamless Waiver in 2001 and 2002, districts that ran the regular SFSP in 2001, and districts that did not run either program in 2001. In addition to interviewing food service directors, researchers visited meal service locations in the California waiver districts. In collaboration with FNS, MPR obtained administrative records for 2001 from the five school districts using the waiver.

One important limitation of the study presented here is that it focuses on a small number of school districts in only two states. SFSP programs vary substantially by state (and even by sponsor). For example, some states provide advance funding for sponsors, and others do not. In addition, some states have special state-funded reimbursement rates that are added to federal rates. Therefore, considerable caution is appropriate in generalizing the information in this report to other sponsors and states.

Major findings include the following:

- The Seamless Waiver increased the number of school districts participating in the SFSP and providing meals for children who were not in school during the summer. Four of the five districts that used the waiver beginning in 2001 had not sponsored the SFSP in 2000, and officials said that they would not have participated in 2001 had it not been for the Seamless Waiver. Instead, they would have used the NSLP to feed only those children who were attending summer school sessions.

- In three of the waiver districts, feeding sites were operated that would not have been open under either the regular SFSP or the NSLP. In two of the five districts, the net gain in participation among children that can be attributed to the waiver is relatively small. In particular, most children participating in these districts were summer school students, who could have been fed under the NSLP if the Seamless Waiver or the SFSP had not been available. By using the waiver instead of the NSLP, however, the districts were able to serve meals to some children who were not attending school.

- In the five waiver districts, the waiver’s rules reduced the workload of, and the hassle perceived by, district food directors of schools sponsoring the summer feeding
program. Administrators interviewed in districts not running the waiver predicted that the simplified rules could reduce administrative burden there as well.

- The waiver produced potential administrative cost savings for the California sponsors in 2001. However, these savings were partially or wholly offset by potential losses because the waiver uses the NSLP reimbursement rate, which is lower than the regular SFSP rate. In general, overall savings and losses were small.

- In 2002, further increases occurred in the number of feeding sites operated and/or the number of children fed in some of the five districts studied. However, only one district attributed the increase directly to the waiver.

- Based on a review of sponsors’ site visit reports from 2001, as well as researchers’ visits to feeding sites in 2001 and 2002, there is no evidence that integrity levels were lower at the waiver sites than at regular SFSP meal locations. However, the context in which the waiver was being operated in the five districts in 2001 and 2002 is not well suited to an examination of integrity issues.

Overall, the findings suggest that there were modest increases in participation associated with the Seamless Waiver. Most of these increases occurred in 2001, when districts that would not have sponsored the SFSP, and therefore would not have fed non-summer-school students, ran summer feeding sites using the waiver. These increases in sponsor participation resulted mainly from the waiver’s ability to reduce the administrative workload of operating summer feeding sites. The streamlined rules associated with the waiver were attractive to nearly all school food service directors and public officials with whom MPR researchers spoke. Administrative savings and losses due to the waiver were generally small.
I. INTRODUCTION

This report presents the results of an evaluation of the Seamless Waiver, which was originally granted to five school districts in 2001. The evaluation was undertaken by Mathematica Policy Research, Inc. (MPR) through a grant from the David and Lucile Packard Foundation. The report focuses on the first two years of the waiver in the five districts that began using it in 2001. In 2002, the Seamless Waiver was made available to school districts nationwide. A forthcoming report will contain information on the national expansion and the results of a survey MPR conducted of districts that used the waiver in 2002.

This chapter describes (1) the Summer Food Service Program (SFSP)—the feeding program traditionally used to provide meals to low-income children during the summer, (2) concerns about the SFSP that led nutrition advocates and school district administrators to request a waiver allowing them to operate their summer nutrition programs differently, and (3) the locations of the five districts that were granted the waiver in 2001. It also presents an overview of MPR’s evaluation of the Seamless Waiver. (Appendix A contains a full description of the evaluation and its methodology.) Chapter II discusses and summarizes our research findings.

A. DESCRIPTION OF THE SFSP

The SFSP is a federal program, created by Congress in 1968, that provides nutritious meals to low-income children during the summer and at other times when school is not in session. It currently operates in all 50 states, the District of Columbia, the Virgin Islands, and Puerto Rico. The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) administers the program.

The SFSP operates by providing funds for organizations to serve meals to children. Meal service is often provided in conjunction with educational or recreational programs and activities.
Organizations eligible to participate in the program are (1) public and private school food authorities (SFAs); (2) local, municipal, county, tribal, and state government offices; (3) residential camps; (4) private, nonprofit organizations; and (5) National Youth Sports Programs (NYSPs).\(^1\) In 1997, school districts were the most common type of organization sponsoring the SFSP, accounting for 45 percent of all sponsors.\(^2\) About 19 percent were camps, 17 percent were government agencies, 16 percent were private nonprofit organizations, and 3 percent were NYSPs (U.S. General Accounting Office 1998).

Sponsors can serve meals at three types of locations: (1) open sites, (2) closed enrolled sites, and (3) camps. An open site is a site in a neighborhood where at least 50 percent of the children are from families with incomes at or below 185 percent of the federal poverty level. At open sites, all children (age 18 and under) may receive free meals. However, sponsors may restrict participation at some open sites for safety, security, or control. A closed enrolled site is one in which at least 50 percent of the children actually attending the program live in households with incomes at or below 185 percent of the poverty level. At these sites, all children enrolled in programs are eligible for free meals. Camp sites are similar to closed enrolled sites; however, sponsors are reimbursed only for meals served to low-income children.

SFSP meal sites include schools, parks, recreation centers, and camps, as well as other locations. Many sponsors serve meals at more than one site. In 1997, for example, 49 percent of sponsors operated the SFSP at more than one site (U.S. General Accounting Office 1998).

\(^1\)The NYSP is a federally funded program that provides organized instruction in athletics to low-income children.

\(^2\)School district sponsors are also known as SFAs, the organizational entities legally authorized to operate school nutrition programs.
Sponsors must conduct outreach to inform the community about the times and locations of free meal services. Sponsors generally conduct a range of outreach activities and many use flyers, posters, signs, advertisements in the newspaper and on TV and radio, public service announcements, and notes sent home with school students at the end of the school year to help spread the word about the SFSP.

The length of the summer feeding program varies. Some organizations start serving meals in May; others begin in June or July. School district sponsors often plan their summer meal program to coincide with summer school, which usually ends by early August. This schedule may result in a gap of time (before the regular school year begins) when school district sponsors usually serve significantly fewer, if any, SFSP meals. Because school districts are the most numerous SFSP sponsors, the gap may affect the overall availability of meals for children. Recently, nutrition advocates have been encouraging SFSP sponsors to expand the length of their summer feeding programs (Food Research and Action Center 2002). For more information on the SFSP, see Ohls et al. (1988).3

Nutrition advocates and policymakers are concerned about the low level of participation in summer meal programs. In summer 2001, approximately 2.1 million children received meals through the SFSP (Food and Nutrition Web site 2002). That number is just 13.5 percent of the number of children who received free or reduced-price lunches during the regular school year (2000-2001 school year).

The National School Lunch Program (NSLP) is another key nutrition program that operates during the summer. The NSLP provides funds for paid, free, and reduced-price school lunches

3The forthcoming MPR report, “Feeding Low-Income Children When School is Out: The Summer Food Service Program” will also contain updated information on the SFSP.
during the regular school year, and such funds also can be used in the summer to feed summer school students. In contrast to the SFSP, only school district sponsors can use the NSLP, and they can use it only to run school-based feeding sites and to serve students attending classes. The SFSP and the NSLP combined served approximately 3.2 million children in summer 2000, or 21 percent of the number of children who received free or reduced-price lunches during the regular school year (Food Research and Action Center 2001).

B. HOW THE SFSP WORKS

1. Program Administration

FNS develops SFSP regulations and provides funds to states to administer the program. In most states, a state government agency runs the program. If a state chooses not to administer the SFSP directly, FNS regional offices assume responsibility. The state office distributes funds to sponsor organizations, provides training and technical assistance to sponsors, and monitors compliance with SFSP rules.

Sponsors operate the SFSP at the local level. They select meal sites, hire and train staff members, purchase or prepare meals, and monitor the safety and quality of the food. SFSP meals may be prepared at the site where they are served or at a central kitchen facility, or they may be purchased from a vendor. All meals must meet meal pattern guidelines set by the USDA. Schools may use the same meal pattern guidelines that they use during the regular school year.

In most cases, the SFSP reimburses organizations for serving up to two meals or snacks per day. Sponsors are reimbursed for the costs of operating and administering the program. Administrative reimbursement is for costs that include office expenses, program management, and administrative staff salaries. The amount of administrative reimbursement a sponsor receives is based on the number of meals served multiplied by the per-meal administrative
reimbursement rate, actual program costs, or the amount specified in the budget submitted as part of the sponsor’s application, whichever is lowest. Operating reimbursement is for costs associated with the purchase, preparation, and serving of meals and is the lesser of the number of meals served multiplied by the operational reimbursement rate or actual costs.  

Sponsors must keep records of their operating and administrative expenses. At the end of each month, they document their expenses and submit the paperwork to the state SFSP office, which is responsible for reimbursing them.

a. SFSP History and Resulting Regulations

Organizations that sponsor the SFSP must comply with detailed program rules concerning where, when, and how meals are served, what paperwork and records must be kept, and how many meals are served at a site. Some of these rules were introduced because of concerns about the program during its early history.

During the mid-1970s, the U.S. General Accounting Office (GAO) discovered significant administrative problems in the SFSP: deliberate dumping of food, poor-quality food, food waste, off-site consumption of food, and food consumption by adults. It documented these problems in a series of reports. The GAO also found evidence of improper bidding, kickbacks, and bribes. Most of the problems appeared to be among private, nonprofit SFSP sponsors, particularly those that used food vendors and served large numbers of children at many sites.

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4 A three-year pilot program operating in 13 states and Puerto Rico through 2004 allows sponsors in those areas to claim reimbursement based only on the number of meals served multiplied by the maximum per-meal reimbursement rate.

5 Jean Jones, Congressional Research Service speech to state summer food service and child care food program directors, Baltimore, MD, March 14, 1994.
As a result of these problems, many rules were introduced into the program during the late 1970s and early 1980s. Sponsorship among private, nonprofit organizations was first restricted and later prohibited; administrative reviews increased; and registration of food service management companies became a program requirement.

Congress has been reducing SFSP regulations since the late 1980s. Private, nonprofit organizations were allowed back into the program in 1989, although with many restrictions, including limits on the number of sites they could operate and on the number of meals they could serve. Some of the restrictions on private nonprofits have been relaxed since 1989. In the late 1990s, the requirement for registering food service management companies that provide SFSP meals was removed. The application process was also streamlined for sponsors that had participated in the program and had experienced no significant problems during the prior year.

However, some SFSP rules are still more restrictive than the requirements for other nutrition programs. For example, to receive reimbursement, the SFSP requires sponsors to track and report both the number of meals served (which is multiplied by the reimbursement rates) and actual program costs. Reimbursement for the NSLP, in contrast, is based only on the number of meals served. The SFSP requires sponsors to visit, or “monitor,” their sites more frequently than does the NSLP. In addition, the SFSP has prespecified limits on the number of meals that may be served at sites.

2. SFSP and Year-Round Schooling

School districts that operate on a year-round schedule can use the SFSP throughout the school year to serve meals and snacks to students who are “off track,” or not in session. These students are not eligible to receive free or reduced-price meals through the NSLP when they are not attending classes.
California is the state with the largest number of year-round schools, with 207 public districts and 1,550 public schools on year-round schedules (National Association for Year-Round Education Web site 2001). These numbers far exceed those of any other state. Arizona, which has the second-largest number of year-round schools, has 45 public districts and 151 public schools on year-round schedules.

C. THE SEAMLESS WAIVER

In response to concerns about low SFSP participation, public officials, advocacy groups, and school district administrators in California developed a waiver request, which, if approved, would allow school districts to operate their summer meal programs differently. The waiver was approved for five school districts in 2001, two in California and three in Florida. The waiver allows these districts to run their summer feeding programs under regulations similar to those used in the NSLP, which they follow during the regular school year. In addition to streamlining the administrative requirements of the SFSP, the waiver was designed to facilitate a “seamless” transition between the school year and summer feeding programs, which normally have different sets of rules and requirements. Therefore, the waiver is referred to as the “Seamless Waiver.”

The changes that the waiver introduced are intended to reduce the costs and administrative workload associated with being an SFSP sponsor. As a result, the Seamless Waiver could attract more school district sponsors and induce existing school sponsors to expand the scope of their programs, either by serving more sites or by serving more children at existing sites. The waiver was developed for school district sponsors because school districts operate food service programs for children during the school year and therefore have the experience and infrastructure required to run the SFSP. It is hoped that increased participation among district sponsors will lead to higher numbers of low-income children receiving summer meals.
Specifically, the rules of the Seamless Waiver differ from those of the regular SFSP in the following key ways:

- Detailed sponsor application procedures, including the requirement to provide data about each feeding site, are simplified.
- Some operating requirements, such as the prespecification of exact feeding times and locations, are waived and replaced by NSLP rules.
- There is no prespecified limit on the number of meals that can be served at each site.
- As in the NSLP, reimbursement for the waiver can be claimed on a simple count of the number of children served, rather than by using the detailed SFSP cost-accounting procedures.
- Sponsors cannot claim reimbursement for any meals served as “seconds.”
- Meals are reimbursed at the National School Lunch, School Breakfast, and After-School Snack program free per-meal rates, which are lower than the maximum SFSP rate.
- Sponsors are permitted to monitor their sites less frequently than under regular SFSP rules.

Beginning in 2001, the Seamless Waiver was run at two school districts in California and at three districts in Florida. The staff in all five districts worked with state office personnel and received approval from FNS to operate their summer programs under the waiver. All five districts continued to use the waiver in summer 2002. The waiver extends through summer 2004.

In 2002, FNS made the Seamless Waiver available to school districts nationwide. By June 2002, more than 500 districts had applied for the waiver and received permission to use it. In these districts, the waiver also extends through summer 2004. MPR conducted a telephone survey of a random sample of districts that used the Seamless Waiver in 2002 and will provide results of the survey in a forthcoming report.
D. THE EVALUATION

This section gives an overview of MPR’s evaluation of the Seamless Waiver, including the research questions and a brief description of the methodology used in the study. Appendix A provides an in-depth treatment of the methodology.

1. Research Questions

MPR received a grant from the David and Lucile Packard Foundation to evaluate the Seamless Waiver. The following research questions guide the evaluation:

- What are the effects of the waiver on the costs of sponsoring the SFSP?
- What are the waiver’s effects on the administrative workload associated with running a summer feeding program, as perceived by program administrators?
- How do these effects, if they exist, affect participation in summer feeding?
- Are there any unintended consequences associated with the waiver, such as a decrease in the level of integrity with which the summer feeding program is run?

The public officials, advocacy groups, and school district administrators who designed the Seamless Waiver hoped that it would reduce the administrative costs of the SFSP. Cost savings are anticipated for two reasons. First, because procedures for operating under the Seamless Waiver on a day-to-day basis are, in general, simpler than those of the regular SFSP, they may require less time and effort to administer. For example, under the waiver, precise rules about the times when meals are served are relaxed. In addition, Seamless Waiver procedures are generally consistent with those of the NSLP, which the school districts are already running. Therefore, the waiver takes advantage of school districts’ familiarity with NSLP rules.

Second, administrative costs may be lower because the waiver simplifies the application process and requires less site monitoring and less detailed cost accounting. For example,
sponsors operating under the waiver are required to monitor their sites half as frequently as are regular SFSP sponsors.

At the same time, however, the reimbursement rate that sponsors can claim for meals served under the Seamless Waiver is lower than that for the regular SFSP. For example, lunches served by the districts using the waiver in 2001 received a federal reimbursement rate that was 17 percent lower than the rate they would have received using the regular SFSP.

In response to these issues, MPR is addressing three questions: (1) Are there cost savings associated with using the waiver instead of the regular SFSP? (2) If so, how significant are the savings? and (3) How do any cost savings compare with the decreased reimbursement rate? These questions were examined during summer 2001. Data on costs were not collected in 2002 because there was no indication that the situation had changed from the previous year.

The waiver rules also are intended to decrease the administrative workload associated with sponsoring the regular SFSP. To some degree, workload is a component of administrative costs, because a reduced workload presumably lowers administrative costs by decreasing the staff time needed to comply with program rules. However, it is clear from talking to sponsor staff members that the workload involved with running the regular SFSP includes an element of perceived “hassle,” which extends over and above its impact on hours worked. “Hassle” includes any unpaid staff hours required to conform to program rules, stress resulting from pressure to meet deadlines, fear of having meals “disallowed” for reimbursement due to minor infractions of rules (such as those concerning mealtimes and locations), and staff concerns about the amount of time spent completing paperwork or conforming to rules that they do not clearly see to be useful. MPR’s evaluation addresses the question: “What are the waiver’s effects on the workload associated with running a summer feeding program?” by including food service
directors’ comparisons of the perceived “hassle” involved in running the waiver and the regular SFSP.

By lowering administrative costs, workload, and perceived hassle, the Seamless Waiver is intended to increase summer feeding participation among school district sponsors. Increased sponsor participation, in turn, may increase the number of low-income children receiving summer meals.

The waiver could increase participation in several ways. It may encourage new organizations to become sponsors, and it may lead existing sponsors to increase the scope of their programs by operating more sites or by feeding more children at current sites. It could also lengthen the period over which school district sponsors serve summer meals. None of the waiver’s rules specifically encourage sponsors to operate feeding programs for extended periods; however, if the waiver produces cost savings or reduces administrative workload and hassle, then it may prompt districts to do so.

MPR’s evaluation examines (1) the extent to which participation has been affected in school districts that are operating the Seamless Waiver, and (2) the potential of the Seamless Waiver to affect participation at school districts not operating the waiver in 2001. Participation is considered in terms of both the level of sponsorship among school districts and the number of meals served. The study also considers the duration of the summer meal programs in the waiver districts.

The outcomes discussed so far are ones intended by the officials and advocacy groups that developed the Seamless Waiver. There is a fourth possible effect of the waiver, which would be an unintended and negative consequence, should it occur. The waiver could have negative effects on program integrity. As mentioned previously, in the late 1970s, problems relating particularly to non-school-district SFSP sponsors were uncovered. The detailed requirements
currently associated with the SFSP were introduced into the program largely as safeguards against such problems. With the simplification implicit in the Seamless Waiver, some of these safeguards have been removed. While most observers believe that this is reasonable, at least for school district sponsors, it still raises the possibility of new problems concerning program integrity. For example, the waiver requires sponsors to monitor their sites only about half as frequently as regular SFSP sponsors must. Given the decreased monitoring, sites may have less motivation to operate in strict accordance with program rules. To the extent possible, the evaluation is examining the occurrence of this outcome.

In addition to providing insight into these research questions, the evaluation documents the implementation of the Seamless Waiver in five school districts. It also describes the locations in and the contexts under which the waiver is operating.

2. **Scope of the Evaluation and Report**

This report focuses on the first two years of the Seamless Waiver in the five districts that started using it in 2001. MPR was initially hired to study the two waiver programs in California. After the evaluation started, we learned that three school districts in Florida were also operating under the waiver. Data and information on these districts have been collected and are reported as they prove useful; however, this report focuses primarily on the waiver in California.

One limitation of this evaluation is that it considers only five summer feeding programs in two states. SFSP programs vary to a large extent by state, and even by sponsor. For example, some states provide advance funding for SFSP sponsors, and others do not. In addition, the

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6 Advance funding is provided in some states to cover a percentage of sponsors’ costs until they receive reimbursement.
number of state-level SFSP staff members varies from state to state and affects the level of outreach, training, and technical assistance that state staff members can provide to sponsors and sites. In addition, California is unique because of (1) its large number of year-round schools, and (2) a statewide supplemental reimbursement rate added to all meals served under the National School Lunch and School Breakfast programs. The information presented in this report, therefore, should not be used to generalize strongly about other states or SFSP sponsors.

3. Methods and Data Sources

MPR used several qualitative research methods and data collection activities to evaluate the first two summers of operations under the Seamless Waiver. Data were collected from (1) the five school districts running the waiver in California and Florida, (2) school districts in California that sponsored the regular SFSP in 2001, (3) California school districts that did not sponsor the SFSP or the Seamless Waiver in 2001, and (4) SFSP officials and advocacy groups. Information for this report was obtained primarily through site visits, in-person and telephone interviews, and analysis of administrative data. Appendix A contains a full description of the methodology and data sources used for the evaluation.

E. PROGRAM CHARACTERISTICS

Table I.1 provides summary information about the five school districts that operated the Seamless Waiver in 2001 and 2002, as well as three school districts that operated the regular SFSP in 2001. Throughout this report, the districts that operated the regular SFSP serve as a rough point of comparison for the waiver districts. Information collected from these districts is intended to provide an idea of the administrative costs, workload, participation levels, and other aspects associated with running the traditional program in 2001. Direct comparisons between waiver districts and regular SFSP districts in terms of meal attendance and program costs are
<table>
<thead>
<tr>
<th>District</th>
<th>State</th>
<th>Total Schools</th>
<th>Enrollment</th>
<th>Percent Eligible for Free/Reduced-Price Lunches Through NSLP</th>
<th>Year-Round Schools&lt;sup&gt;a&lt;/sup&gt;</th>
<th>Uses Provision 2 of NSLP&lt;sup&gt;b&lt;/sup&gt;</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Seamless Waiver Districts:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alisal Union Elementary School District</td>
<td>CA</td>
<td>10</td>
<td>7,926</td>
<td>88</td>
<td>Yes&lt;sup&gt;c&lt;/sup&gt;</td>
<td>Yes</td>
</tr>
<tr>
<td>Fresno Unified School District</td>
<td>CA</td>
<td>99</td>
<td>79,007</td>
<td>70</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>DeSoto County School District</td>
<td>FL</td>
<td>12</td>
<td>4,618</td>
<td>72</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Dixie County School District</td>
<td>FL</td>
<td>4</td>
<td>2,305</td>
<td>67</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Volusia County School District</td>
<td>FL</td>
<td>92&lt;sup&gt;d&lt;/sup&gt;</td>
<td>61,517</td>
<td>40</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td><strong>Comparison Districts:</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alum Rock Union Elementary School District</td>
<td>CA</td>
<td>25</td>
<td>13,479</td>
<td>77</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Farmersville Unified School District</td>
<td>CA</td>
<td>5</td>
<td>2,176</td>
<td>90</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Winton Elementary School District</td>
<td>CA</td>
<td>3</td>
<td>1,669</td>
<td>95</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>


<sup>a</sup>Column indicates that some, but not necessarily all, schools in the corresponding district use year-round calendars.

<sup>b</sup>Provision 2 of the NSLP allows school districts with large proportions of students who are eligible for free or reduced-price meals to serve free meals to all children and to claim reimbursement on the basis of the percentages of free, reduced-price, and paid meals claimed in a designated “base year.”

<sup>c</sup>Alisal Union discontinued year-round schooling in 2002 and returned all of its schools to a traditional school year calendar.

<sup>d</sup>Volusia County Schools District is associated with 92 schools; however, several are not traditional elementary, middle, or high schools, and one was closed down as of 2000-2001.
generally not appropriate, however, due to differences in enrollment levels and other characteristics of the districts.

The California school districts that ran the Seamless Waiver in 2001 and 2002 serve diverse and relatively low-income communities. Both districts have high proportions of students eligible to receive free and reduced-price meals during the school year through the NSLP. Alisal Union Elementary School District is a relatively small district made up of 10 schools. Fresno Unified School District is a large, urban district made up of 99 schools. In Florida, two of the three waiver districts are small and serve rural communities. The other district is larger and serves a suburban area. Appendix B contains a more detailed, narrative description of waiver districts and comparison districts.
II. FINDINGS

This chapter presents MPR’s findings based on the first two summers of operations under the Seamless Waiver in five school districts. We present findings for the four key evaluation issues: (1) participation, (2) program administration, (3) costs, and (4) program integrity.

A. PARTICIPATION

Findings on the effects of the waiver on participation are based on discussions with school food service directors and on administrative records. We used interviews and records to obtain information about the following evaluation questions: (1) How many districts and sites that operated under the waiver beginning in 2001 would not have operated without the waiver? (2) How many children were fed at these sites? and (3) Did the districts’ feeding program change between 2001 and 2002 in the number of sites operated or children fed? Administrative records and interviews also provided insight about the duration of the summer feeding programs in the waiver districts.

Findings about the waivers’ potential to influence participation in other school districts are based on interviews conducted in 2001. MPR researchers asked personnel in the three comparison districts whether the Seamless Waiver would cause them to consider increasing their level of summer feeding sponsorship. Personnel in 10 California districts that did not sponsor the SFSP in 2001 also were asked about this topic. All interviews were conducted before the national expansion of the Seamless Waiver.

One difficulty in evaluating participation in terms of the number of children attending meals is that the NSLP provides a possible alternative to both the Seamless Waiver and the regular SFSP. Districts that do not choose to participate in the latter programs can use the NSLP to feed students attending school during the summer, and many districts do so. In summer 2000 (prior to
the waiver), four of the waiver districts sponsored the NSLP instead of the regular SFSP. All 10 districts that MPR researchers contacted that did not run the SFSP in 2001 ran the NSLP instead. Summer participation in the NSLP has been increasing over the past several years, consistent with trends toward year-round schooling and increased requirements for summer school participation.1

The main advantage of the regular SFSP and the Seamless Waiver is that, in contrast to the NSLP, both programs can be used to feed children not attending school in the summer. They provide meals to children in the community who are not attending school (but who may be enrolled in recreational or other activity programs) and children younger than school age, as well as to students in school programs. Thus, in the following section, we focus on increased meal attendance associated with the waiver in terms of the number of children not attending school who received summer meals in 2001 and 2002—that is, the number who would not have received meals from the school districts without the waiver. Students attending classes would likely have received meals under the NSLP, even if the waiver did not exist.

1. Effects on Participation

In its first year, the Seamless Waiver increased the number of school districts feeding children from the entire community, as opposed to only those attending summer school. Four of the five districts running the waiver in 2001 did not sponsor the regular SFSP in 2000. Instead, they sponsored the NSLP in conjunction with summer school or year-round schooling. Food service directors in these districts reported that, if it had not been for the waiver, they would have done the same thing in 2001. If this had been the case, only those children attending academic

1Summer participation in the NSLP increased from 793,386 in summer 1992 to 1,137,536 in summer 2000 (Food Research and Action Center Web site 2001).
school sessions would have received meals. In three of the districts, the number of summer feeding sites increased between 2000 and 2001. The new sites were locations in which classes were not taking place and, therefore, locations in which the NSLP could not have been run.

In 2002, participation at the waiver districts in California was slightly higher than 2001 levels. Both districts added school-based feeding sites to their programs, and as a result experienced small increases in participation among students who were not attending school. Meal attendance in both districts’ recreation center sites increased between 2001 and 2002, as well. In Florida, two of the three waiver districts expanded the number of sites in their summer feeding programs in 2002. In one of the districts, the additional sites were nonschool locations and resulted in greater participation among children from the community.

The waiver districts conducted outreach to publicize the availability of free meals under the Seamless Waiver in 2001 and 2002. In both years, outreach activities were generally consistent with the types and intensity of activities usually undertaken by SFSP sponsors. The length of summer feeding in the waiver districts varied; however, little evidence exists that the waiver influenced the duration of the programs.

Table II.1 summarizes the changes in participation in 2001 and 2002. The text describes these changes in detail for each waiver district in California and Florida.

**a. Alisal Union Elementary School District.** In 2001, Alisal increased its summer feeding participation in the number of sites run and the number of students fed who otherwise would not have received meals from the district. According to the food service director, Alisal would not have served meals at nonschool sites in 2001 under the regular SFSP. Instead, the director would have run the NSLP and fed only those students attending summer school and year-round schooling. Up until about eight years ago, Alisal did sponsor the SFSP to feed children not attending school in the summer. The director reported that the district stopped because of high
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<tbody>
<tr>
<td>Program Sponsored in 2000</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NSLP</td>
<td>SFSP(^a)</td>
<td>NSLP</td>
<td>NSLP</td>
<td>NSLP</td>
<td></td>
</tr>
<tr>
<td>Total Waiver Sites in 2001</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of sites that could not have been run under NSLP (nonacademic sites), 2001</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>26</td>
<td>2</td>
<td>9</td>
<td>18</td>
<td></td>
</tr>
<tr>
<td>Estimated number of meals served at sites in row above</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4,034 lunches(^b)</td>
<td>2,845 lunches</td>
<td>7,223 meals</td>
<td>28,350 lunches(^c)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5,902 snacks</td>
<td>0</td>
<td>7</td>
<td>9</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of school sites (feeding walk-ins) under waiver, 2001</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>0</td>
<td>25</td>
<td>2</td>
<td>2</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Total Waiver Sites in 2002</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of sites that could not have been run under NSLP (nonacademic sites), 2002</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>30</td>
<td>2</td>
<td>12</td>
<td>27</td>
<td></td>
</tr>
<tr>
<td>Estimated number of meals served at sites in row above</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5,003 lunches</td>
<td>5,670 lunches(^e)</td>
<td>0</td>
<td>15,048 lunches(^f)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6,297 snacks</td>
<td>0</td>
<td>9</td>
<td>Unable to be determined(^d)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of school sites (feeding walk-ins) under waiver, 2002</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>29</td>
<td>2</td>
<td>3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: District administrative data and interviews.

\(^a\) Fresno is the only district studied that ran the regular SFSP in 2000. The district would likely have run the SFSP in 2001 as well, if the Seamless Waiver had not been available. Thus, the number of sites that could not have been run under NSLP and the number of children fed at these sites, as presented in the table, probably would have been run/served anyway.

\(^b\) Meals served at Alisal during August 2001 were estimated based on meal attendance reports from the first week of August.

\(^c\) Because Volusia served between 30 and 150 children per day at each site, the midpoint was used to produce this estimate. In addition, Volusia’s sites varied in the number of days they served lunch during summer 2001. MPR based its estimate on 35 days of meal service for all sites.

\(^d\) All 27 of Volusia’s 2002 feeding sites were school-based, with a variety of academic summer school, enrichment programs, and recreational activities taking place. The food service director was unable to determine how many sites were run specifically in conjunction with summer school.

\(^e\) Fresno served an average of between 150 and 175 children per day at this meal site. The midpoint of this range was used to produce the estimate in this table.

\(^f\) Dixie had a total average daily meal attendance of 534 for all 12 sites. Therefore, we estimated meal attendance at each site to be 44 children.
program costs and burden. The Food Bank of Monterey County took over the program for several years; however, in 1999, it, too, stopped participating. The food bank’s executive director stated that the decision to exit the program was made because (1) the partner organization in charge of the feeding sites was unreliable, (2) the level of administrative detail required to run the program was very high, and (3) the costs of the program exceeded reimbursement.

In 2001, Alisal continued to operate the NSLP at summer school sites, and it also used the Seamless Waiver to serve meals and snacks to children who were not in school at four recreation center sites. Between June and August 2001, approximately 4,034 lunches and 5,902 snacks were served at these four waiver sites. Without the waiver, Alisal would not have served these meals to children in the community.

In 2002, Alisal switched its 10 school-based feeding sites from operating under the NSLP to operating under the Seamless Waiver. The director reported that she did this because it was easier to operate all feeding sites under one program. A small number of children (about five a day at each school) who were not attending classes received meals at Alisal’s 10 school sites, which were open to the entire community. In addition to the school sites, the district again sponsored the four recreation sites in 2002. Participation at these sites totaled 5,003 lunches and 6,297 snacks from June to August, a small increase over 2001 participation levels at the four sites.

b. Fresno Unified School District. In the Fresno Unified School District, the Seamless Waiver probably had a proportionally smaller impact on participation in 2001 than in Alisal. It is difficult to assess the effects of the waiver on participation in Fresno because the district ran the regular SFSP in 2000 and would likely have run it again in 2001 in the absence of the
Seamless Waiver. Thus, with or without the waiver, the district may have operated the same sites and fed the same number of children.

In 2001, Fresno operated the waiver at 26 sites, and it also operated the NSLP at sites that did not qualify for area eligibility under the waiver (or the SFSP). The district conducted outreach activities including sending letters and flyers (printed in multiple languages) to homes and publicizing a telephone number that individuals could call to receive information about meal services.

Twenty-five of Fresno’s 26 waiver sites were schools. Had the district decided not to operate the SFSP or the waiver, the NSLP could have been used to serve students at these sites. In that case, the children who were not attending classes but who came to the school just to receive meals would represent the total increase in participation due to the waiver at the 25 school sites. The district’s food service director reported that the number of these children, hereafter referred to as “walk-ins,” was low. She estimated that, at most sites, no more than 10 to 15 walk-ins attended meal services at school sites each day. Fresno’s recreation site, which could not have been run at all if the district had not used the waiver or the SFSP, served 2,845 lunches between June and August 2001.

In 2002, Fresno sponsored 29 school sites under the waiver, as well as the recreation site that it had sponsored in 2001. The district also used the NSLP to feed students at 45 school sites. Participation at the recreation site increased: approximately 5,670 lunches were served there during summer 2002. Although the food service director had considered opening additional nonschool sites, issues of food transportation, staffing, and safety prevented the district from doing so. The director said that she would again consider adding nonschool sites in 2003 if she can resolve these issues.
c. **DeSoto County Schools.** None of the Florida districts sponsoring the Seamless Waiver in 2001 participated in the regular SFSP in 2000. In DeSoto County, the school district had sponsored the NSLP in conjunction with summer school in 2000. The situation would have remained the same, according to the food service director, but the streamlined rules and paperwork associated with the waiver enticed the district to switch to the Seamless Waiver.

The effect of the waiver on the number of children fed in DeSoto County in both summers, 2001 and 2002, appears to be small. DeSoto’s feeding sites during both summers were two schools where summer school sessions were taking place. Most children attending meal services were students who could have been fed under the NSLP, although, in 2002, one site served about 20 children a day from a work development program. Only a few children who were not attending classes or the work development program were fed at DeSoto’s waiver sites.

d. **Dixie County Schools.** In Dixie County, the Seamless Waiver increased participation by allowing the school district, which had sponsored the NSLP in 2000, to serve nonschool sites in 2001. According to the district’s food service coordinator, Dixie would not have operated these nonschool sites under the regular SFSP.

In 2001, Dixie operated nine waiver sites, although four were church-based sites that served meals for only a few days. Two of the five remaining sites were schools where summer school was run, one site was a fire department building, one was a city hall, and one was a Head Start building. Without the waiver, the district would not have been able to operate the nonschool sites, which served 7,223 meals during the summer.

Dixie’s summer feeding program grew to 12 sites in 2002. The food service director attributed this expansion to increased community awareness since 2001 about the waiver and the free summer meals it offers. The director said that the district had a telephone hotline set up to give out information to those interested in meal services, and that it received many telephone
calls requesting the times and locations of meal services throughout the entire summer. The
district may consider adding even more sites in 2003.

Three of Dixie’s 2002 feeding sites were at schools, and nine sites were in nonschool
settings, including recreation centers. Approximately 15,048 lunches were served at these
nonschool sites.

e. **Volusia County Schools.** Like the other districts in Florida, Volusia County would not
have sponsored the regular SFSP in 2001, according to the assistant director of food services.
When asked why the district had not participated in the SFSP recently, she listed such
requirements as paperwork and the program’s cost-accounting system. During summer 2000,
Volusia ran the NSLP at a few high schools to feed summer school students.

In 2001, the district sponsored 18 sites under the Seamless Waiver. While all the sites were
in schools, only nine were run in conjunction with summer school sessions. Recreational
activities and summer activity programs were taking place at the other nine locations. According
to the assistant director, these latter sites could not have been operated using the NSLP. Average
daily participation at the nonacademic school sites ranged from 30 meals at the smaller locations
to about 150 meals at the larger ones.

In 2002, due to the district’s participation in a Title I enrichment program at many of the
schools, Volusia’s summer feeding program expanded to 27 sites. All sites were school-based
and were run under the Seamless Waiver. A mixture of regular summer school classes, the new
enrichment program, and recreational activities occurred at the sites, and the director did not
know exactly how many of the 27 schools would have been eligible to run the NSLP if the
Seamless Waiver had not been available. The district’s 2003 feeding program and the number of
sites operated will depend on whether the enrichment program continues and expands.
2. Duration of Summer Feeding in the Waiver Districts

The length of the summer feeding program in the five districts varied; however, little evidence exists that the Seamless Waiver influenced the duration of the programs. Alisal is the only district that altered the duration of its feeding program after it received the Seamless Waiver. Alisal served lunches and snacks at four waiver sites from the beginning of June until late August in 2001, and the sites continued to serve after-school snacks during the school year. In 2002, the pattern was similar. Alisal’s 10 school-based waiver sites closed in late July or early August, and the recreation sites served lunches and snacks until the end of August, with snacks continuing throughout the school year.

In Fresno, 25 school-based waiver sites had stopped serving meals by early August 2001, when summer school and year-round classes ended. Only one site—the recreation center—remained open. The schedule was similar in 2002. This pattern is similar to the duration of summer feeding in many districts. For example, Winton Elementary School District, which ran the regular SFSP at three school sites during summer 2001, kept one site open following the conclusion of summer school.

In Florida, the school year begins in early August. DeSoto County School District provided meals to children throughout June 2001 and 2002; however, no sites were open during July of either year. Dixie County’s waiver sites varied in duration, but most opened in the beginning or middle of June and closed in the beginning or middle of July. Volusia County School District’s Seamless Waiver sites opened in early June and closed in the middle or end of July in both years.

3. Potential Effects in Nonwaiver Districts

In addition to measuring the effects of the Seamless Waiver on participation in the five waiver districts in 2001 and 2002, MPR’s evaluation considered the Seamless Waiver’s potential to increase levels of summer feeding in the future. School food service administrators were
interviewed about this topic in 2001, before the waiver became available to them through the national expansion.

Administrators in several school districts with whom MPR researchers spoke reported that the waiver would entice them to consider (1) serving summer meals at nonschool sites, or (2) expanding the scope of their current summer programs. In other cases, although administrators recognized the attractiveness of the waiver’s rules, considerations other than program costs and administrative ease prevent their districts from starting or expanding a summer feeding program.

A food service director in one of the three comparison districts that ran the regular SFSP in 2001 stated that, if she could operate under waiver rules, she would consider expanding the district’s current summer feeding program. Specifically, she would consider serving meals at a nonschool site—probably a park or a recreation center—in addition to the current school sites. Given the complexity of the regular SFSP, she would not be likely to try new sites using the standard rules.

In the two other comparison districts, administrators found the rules associated with the waiver attractive; however, they said that the waiver would probably not lead them to expand their districts’ summer feeding programs. These districts have limited staff available in the summer. They are also worried about the lower reimbursement rate of the waiver and are not sure that their communities need expanded meal service.

Food service directors from 2 of the 10 California school districts contacted that did not sponsor the SFSP in 2001 said that the Seamless Waiver would lead their districts to seriously reconsider feeding nonschool children during the summer. For example, one of these directors has been considering running the SFSP for years, thinks the program is a great idea, and has attended meetings about the summer program. However, the bulky application forms and the rules and regulations of the regular SFSP have dissuaded her. The largest kitchen facilities in her
district were being renovated in 2001; the director said that she would again consider operating a summer feeding program for the community after the renovations are completed.

In two other districts, reactions to the waiver were positive, but more cautiously so. Administrators said that the waiver could cause them to consider sponsorship but that factors besides program rules would also have to be considered. These factors include the availability of extra food service staff to work in the summer and the attitudes of school officials toward a community feeding program with open sites. In some districts, especially those with high poverty rates and levels of crime, school officials are concerned about the potential security problems of opening school premises to the entire community for meals.

In four of the remaining six districts, administrators stated that the waiver would not sway them because other organizations are operating the SFSP to feed children in their communities. The food service directors do not think that these areas need additional summer meal providers.

One of the two remaining non-SFSP districts contacted in 2001 exited the program before 2000 due to the administrative workload; the food service director will not consider reentering the SFSP or using the Seamless Waiver. The local Parks and Recreation Department assumed sponsorship of the SFSP in this district.

In the final district, which also participated in the SFSP before 2000, parents and school administrators were concerned about the safety implications of sponsoring open sites. The district switched to the NSLP, and another organization assumed sponsorship of the SFSP. The director stated that, unless conditions in the community change, safety concerns will prevent the district from sponsoring the SFSP again and from using the waiver.

B. PROGRAM ADMINISTRATION ISSUES

Perceptions of staff members directly involved with a program on a day-to-day basis can help measure how easy or difficult it is to administer the program. To measure these perceptions,
MPR relied on in-depth interviews with waiver and comparison school districts in California and on telephone interviews with Florida SFSP officials and administrators in 2001. The degree of administrative burden, or “hassle,” of the regular SFSP was compared with that of the Seamless Waiver. The ease of running the NSLP was also considered, since the NSLP is a possible alternative to the regular SFSP and the waiver.

As mentioned previously, hassle can include any unpaid staff hours required to conform to program rules, stress resulting from pressure to meet deadlines, fear of having meals “disallowed” for reimbursement due to minor infractions of rules (such as those concerning mealtimes and locations), and staff concerns about the amount of time spent completing paperwork or conforming to rules that they do not clearly see to be useful.

Program costs are another important administrative issue. We discuss the waiver’s effects on costs during summer 2001 later in this chapter.

1. Traditional SFSP Administration

Sponsors MPR contacted saw the regular SFSP as a cumbersome program. They felt that the program’s application procedures are lengthy, the cost-accounting system is complicated, and requirements for operating the program at the site level are detailed and numerous. SFSP rules that respondents mentioned as being burdensome included the following:

- To receive reimbursement, sponsors must report data on meal counts, operating costs, and administrative costs. Cost data include all expenses related to food, labor, nonfood supplies, space for the food service, rental costs for offices and vehicles, supplies, communications, audits, and travel. These costs must be broken down into operating and administrative expenses.
- SFSP meals must be served according to detailed time specifications. For example, the duration of meals is limited to two hours for lunch and for supper and one hour for all other meals. Three hours must elapse between the beginning of one meal service and the beginning of another. Sponsors must prespecify meal service times; to change the time of a meal service, they must notify the state agency in advance.
Sponsors must conduct visits to their sites before the sites may begin operating. They must also visit sites during the first week of meal service. (Some state agencies may waive this requirement for school district sponsors.) In addition, sponsors must review all sites within the first four weeks of summer operations and must maintain a “reasonable level” of site monitoring thereafter.

These numerous, detailed regulations have caused some districts that MPR spoke with to exit the SFSP and have dissuaded others from participating. In MPR’s interviews with 10 California school districts that did not sponsor the SFSP in 2001, three mentioned that they exited the program or would not consider sponsoring it primarily due to the paperwork and rules, as well as the staff time required to fulfill the rules. The Florida SFSP coordinator reported that sponsors in the state have two main complaints about the program: (1) the amount of paperwork, and (2) the requirements associated with obtaining cost reimbursement.

2. **NSLP Administration**

School districts that choose to operate the NSLP during the summer follow the same procedures used to run the program during the school year. These procedures include developing a system to identify which students are eligible to receive free or reduced-price meals. Many districts accomplish this task by distributing meal tickets to children qualifying for the benefit. Another task under the NSLP includes collecting money from children for reduced-price meals or paid meals (for students who do not qualify for free meals).

3. **Administration Under the Waivers**

The administrators and officials whom MPR contacted find the rules associated with the Seamless Waiver attractive because they are simpler than regular SFSP rules and are similar to NSLP regulations. However, because they allow all children to eat for free, they also streamline some of the procedures involved with running the NSLP that are described above. All food service directors interviewed responded positively to the streamlined requirements of the waiver.
They said that the rules did, or predicted that the rules would, reduce the level of hassle associated with sponsoring a summer feeding program in their districts.

Some of the changes made by the waiver were especially well received. Administrators unanimously supported the increased flexibility of the times and locations of meal service. According to Alisal’s food service director, for example, the additional flexibility means that more children are fed. If children at the recreation sites do not eat all the food provided, staff members now have time to round up children playing in the streets or hanging around outside and have them come in and eat the meals. Increased flexibility also means that children who arrive late for meals do not have to be turned away.

All the administrators liked the fact that the waiver relaxes the amount of prenotification the state office requires to change meal times or locations. Under regular SFSP rules, sponsors must notify the state office well in advance of any changes, so this change enables the food service staff to more easily accommodate last-minute field trips and off-site events. The directors also responded positively to the reduced site-monitoring requirements.

Most administrators preferred the Seamless Waiver’s application procedures to those of the regular SFSP. One food service director who ran the SFSP in 2001 did not consider the application for that program burdensome; therefore, she was ambivalent about streamlining it. In 2001, the state office sent her a preprinted, simplified SFSP application form, which took only about two hours to complete. On the other hand, Fresno’s food service director estimated that the regular SFSP application for Fresno required 130 hours to complete in 2000 (in part, because the application process required printing out maps for each of Fresno’s 26 sites). Thus, the savings in time and workload achieved by using the waiver depend on the state application requirements, the procedures used in each district (which vary widely), and the size of the district’s feeding program.
The waiver rules were well received at all sites; however, they were especially popular among districts that operate both the NSLP and the SFSP or the Seamless Waiver during the summer. Alisal, Alum Rock, and Fresno school districts each ran two feeding programs in 2001. Administrators at these districts reported that it is complicated to run the NSLP and the regular SFSP concurrently because (1) they must keep separate records of expenses, meal counts, and staffing; and (2) staff members must comply with different sets of rules when operating meal sites. Because the waiver substitutes NSLP rules for the waived SFSP regulations, it largely eliminates this hassle, and the directors felt that the waiver rules made (or would make) operating two programs more manageable. Alisal switched all of its sites to the Seamless Waiver in 2002 because the director felt that running just one program would be the easiest procedure. This change resulted in the district’s 10 school-based sites being “open” to children not attending school in the summer (although actual participation among walk-ins was low).

Fresno’s food service director felt that the waiver works particularly well in school districts that use Provision 2 during the school year. She believes that the Seamless Waiver and Provision 2 reduce the administrative hassle and paperwork involved in running Fresno’s food service program. Both the waiver and Provision 2 allow districts to provide universal meal service without determining the eligibility status of individual children receiving meals. If Fresno were to use the NSLP instead of the Seamless Waiver at its 29 waiver sites, the district would have to develop and implement a system for distributing meal tickets to students eligible for free or reduced-price meals at those locations and collect money for paid and reduced-price meals.

2 Provision 2 allows schools with high proportions of students eligible for free or reduced-price lunches to serve free meals to all children and claim reimbursement based on the percentages of free, reduced-price, and paid meals established in a “base year,” instead of collecting individual applications every year and distributing meal tickets. Appendix B contains a more detailed explanation and discussion of Provision 2.
meals even though, under Provision 2, this is not necessary at most of the schools during the school year. Districts that do not use Provision 2 would also have to distribute meal tickets and collect money like they do during the school year if they used the NSLP to feed students during the summer.

The issue of reduced administrative workload and perceived hassle was extremely important to many of the food service directors MPR contacted and was significant enough to influence decisions about sponsoring the SFSP and the Seamless Waiver. In Alisal Union School District, the decision not to run the regular SFSP prior to the waiver was due to the administrative burden of the regular program, and the relative ease of the Seamless Waiver caused the food service director to reenter the program. The same is true of all three Florida districts sponsoring the waiver. They cited the amount of paperwork and staff time the regular program required as their main reasons for not previously participating in the SFSP. They found administering the Seamless Waiver to be a very manageable task, similar to administering the NSLP. Without the waiver, they would not have participated in summer feeding programs for the community.

C. COSTS

MPR analyzed program costs associated with running the Seamless Waiver and the regular SFSP during summer 2001. Two main sources of data were used: (1) interviews with food service directors, and (2) administrative reports (including reimbursement claim forms) that sponsors submitted to the state office. MPR examined two aspects of costs. First, interviews were used to generate estimates of the potential administrative savings resulting from time saved using the Seamless Waiver instead of the regular SFSP in Alisal and Fresno school districts. Second, participation data from claim forms and other paperwork were used to determine how much money the five waiver districts lost due to the waiver’s lower reimbursement rate. Potential administrative savings were compared to losses for the California waiver districts.
Reimbursement rates used in these analyses are from 2001 and were obtained from the Food and Nutrition Service Web site. California Food Policy Advocates provided information about California’s state reimbursement rate for meals served under the NSLP (and the Seamless Waiver).

1. Potential Administrative Savings

a. Methods

To estimate the level of administrative savings associated with the waiver, researchers asked food service directors in the California waiver districts detailed questions about how much time they had saved on each aspect of administering the summer feeding program in 2001 by using waiver rules instead of regular SFSP guidelines. To obtain total administrative savings for the districts, time saved was multiplied by staff salary data. Both food service directors were familiar with the regular SFSP and were able to base their estimates on past experiences running that program. The Fresno school district sponsored the regular SFSP in 2000, and Alisal did so until about eight years ago. Since neither one planned to sponsor the regular SFSP in 2001 (because they received the waiver), personnel had not thought carefully about how they would have allocated time and resources to run the program. Thus, their estimates must be regarded only as approximations of true savings. Nevertheless, the information helps to place approximate bounds on the degree of savings gained by using the waiver.

b. Findings

In both California waiver districts, the Seamless Waiver saved time and administrative costs. Table II.2 describes these savings for June to August 2001. At Fresno, estimated administrative

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3 Although both Fresno and Alisal use the Seamless Waiver to operate a limited number of sites throughout the year, SFSP meal service peaks during the three-month summer period.
TABLE II.2
POTENTIAL ADMINISTRATIVE SAVINGS ASSOCIATED WITH THE SEAMLESS WAIVER:
CALIFORNIA WAIVER DISTRICTS (JUNE TO AUGUST 2001)

<table>
<thead>
<tr>
<th>District</th>
<th>Administrative Task</th>
<th>Hours Saved</th>
<th>Total Savings (Dollars)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alisal Union</td>
<td>Application</td>
<td>8</td>
<td>320</td>
</tr>
<tr>
<td></td>
<td>Communication with state office</td>
<td>30</td>
<td>1,760</td>
</tr>
<tr>
<td></td>
<td>about changes</td>
<td>9</td>
<td>250</td>
</tr>
<tr>
<td>Total Savings</td>
<td></td>
<td></td>
<td>2,330</td>
</tr>
<tr>
<td>Fresno Unified</td>
<td>Application and preoperational</td>
<td>207(^a)</td>
<td>6,280</td>
</tr>
<tr>
<td></td>
<td>visits</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Communication with state office</td>
<td>30</td>
<td>1,530</td>
</tr>
<tr>
<td></td>
<td>about changes</td>
<td>48</td>
<td>2,460</td>
</tr>
<tr>
<td>Total Savings</td>
<td></td>
<td></td>
<td>10,270</td>
</tr>
</tbody>
</table>

SOURCE: Interviews with food service directors.

NOTE: Rates used to generate savings estimates include employee benefits.

\(^a\)Probably high because the estimate assumes that no time was spent on the 2001 application.

Savings were about $10,270 and were due mainly to the decreased application procedures, fewer preoperational site-monitoring visits, reduced time spent communicating with the state office about meal service changes, and the simplified claims process of the waiver. At Alisal, a much smaller district, $2,330 in savings are estimated due to reduced application procedures, site-monitoring requirements, and communication with the state office. In both districts, staff members probably shifted the time saved to other activities. Thus, the potential savings may or may not have been realized.

To provide additional information on how much time these tasks usually take under regular SFSP rules, Table II.3 contains information from the three comparison sites in California. These school districts operated the regular SFSP during summer 2001. The data provide some insight
into the extent to which the waiver could produce administrative savings in districts currently running the regular SFSP.

In small districts, like Farmersville and Winton, the Seamless Waiver might save a minimal amount of time, because the summer program does not require much administrative time to begin with. In Farmersville, it would likely save a few hours on each task. In Winton, the main savings would probably occur due to the decreased monitoring requirements of the waiver, which might cut in half the amount of time spent on site visits. Even with these time reductions, however, the total amount of administrative savings produced would be small.

In larger districts, the waiver might have more of an impact on time and costs. For example, in Alum Rock, the amount of time spent on the regular SFSP application is twice as much as in Farmersville or Winton. Thus, the Seamless Waiver might create more substantial savings in this district. Significant savings might also be realized in site monitoring.

Overall, the information from the three comparison sites is broadly consistent with cost savings estimates from the California waiver districts. Savings associated with the waiver may
vary by state, however, due to differences in administrative requirements, particularly in the application procedure.

2. Differences in Reimbursement

a. Methods

The waiver may have other effects on sponsors’ budgets in addition to producing administrative savings. For example, it replaces the SFSP per-meal reimbursement rate with the NSLP rate, which is lower. Therefore, total reimbursement received by Seamless Waiver sponsors is lower than what it would have been under the regular SFSP. To determine the extent and significance of the waiver’s rate difference in 2001, MPR estimated the amount of reimbursement lost by all five districts using the waiver.

The SFSP reimbursement rate varies. Sponsors that prepare their own meals and those in rural locations receive a slightly higher administrative reimbursement rate than other sponsors. The five districts that began using the waiver in 2001 all prepare their own meals; therefore, they all would have received the slightly higher reimbursement rate for breakfasts, lunches, and snacks if they had used the SFSP instead of the Seamless Waiver, and this is the rate we used in our analysis.

National School Lunch and School Breakfast program (NSLP/SBP) reimbursement rates vary according to whether a district is in a highly disadvantaged area. In our analysis, we used the NSLP reimbursement rate for free lunches served in districts where more than 60 percent of students qualify for free or reduced price meals because the districts running the waiver have
high percentages of free and reduced price eligible children (see Table I.1). For breakfasts, we used the severe need rate. 4

California provides a unique supplemental statewide reimbursement to sponsors for meals (but not snacks) served under the NSLP/SBP. Since meals served under the Seamless Waiver are reimbursed at the NSLP/SBP rates, the waiver meals also receive the supplemental rate. Specifically, in addition to USDA reimbursement, sponsors in California receive $0.13 for every breakfast and lunch served. SFSP meals do not receive the statewide reimbursement. In California, therefore, the difference between the SFSP maximum reimbursement rate and the waiver rate is not as large as it would be normally.

Table II.4 shows the reimbursement rates for meals served under the regular SFSP and the Seamless Waiver. Participation data (number of meals served) from the waiver districts were multiplied by each rate. The difference between the two products is an estimate of the amount of reimbursement lost. California’s supplemental reimbursement rate was included in the NSLP rates for Alisal and Fresno.

For example, the Fresno school district served 104,372 lunches during the days it operated the Seamless Waiver during summer 2001. If the district had used the regular SFSP and had received the maximum SFSP reimbursement rate, it would have been reimbursed $257,016 for the meals. By choosing the waiver, which uses the NSLP rate and also receives the California supplemental meal rate, Fresno was reimbursed a maximum of $233,793, representing an overall loss of $23,233.

4 Both of the waiver districts in California reported receiving severe need rates for breakfasts served in the SBP.
<table>
<thead>
<tr>
<th>Waiver District</th>
<th>Number Of Meals Served</th>
<th>SFSP Total Reimbursement (Dollars)</th>
<th>SFSP Total Reimbursement (Dollars)</th>
<th>NSLP Total Reimbursement (Dollars)</th>
<th>NSLP Total Reimbursement (Dollars)</th>
<th>Dollars Lost (SFSP – NSLP)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alisal</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lunches</td>
<td>4,034</td>
<td>9,933.73</td>
<td>13,371.64</td>
<td>9,036.16</td>
<td>12,400.30</td>
<td>971.34</td>
</tr>
<tr>
<td>Snacks</td>
<td>5,902</td>
<td>3,437.92</td>
<td></td>
<td>3,364.14</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fresno</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lunches</td>
<td>104,372</td>
<td>257,016.05</td>
<td>257,016.05</td>
<td>233,793.28</td>
<td>233,793.28</td>
<td>23,222.77</td>
</tr>
<tr>
<td>DeSoto</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Breakfasts</td>
<td>1,377</td>
<td>1,938.13</td>
<td>11,256.23</td>
<td>1,886.49</td>
<td>9,870.73</td>
<td>1,385.50</td>
</tr>
<tr>
<td>Lunches</td>
<td>3,784</td>
<td>9,318.10</td>
<td></td>
<td>7,984.24</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dixie</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Breakfasts</td>
<td>437</td>
<td>615.08</td>
<td>22,383.58</td>
<td>598.69</td>
<td>19,251.09</td>
<td>3,132.49</td>
</tr>
<tr>
<td>Lunches</td>
<td>8,504</td>
<td>20,941.10</td>
<td>17,943.44</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supper</td>
<td>336</td>
<td>827.40</td>
<td></td>
<td></td>
<td></td>
<td>708.96</td>
</tr>
<tr>
<td>Volusia</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Breakfasts</td>
<td>16,635</td>
<td>23,413.76</td>
<td>120,993.07</td>
<td>22,789.95</td>
<td>106,576.98</td>
<td>14,416.09</td>
</tr>
<tr>
<td>Lunches</td>
<td>39,039</td>
<td>96,133.54</td>
<td>82,372.29</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Snacks</td>
<td>2,482</td>
<td>1,445.77</td>
<td></td>
<td></td>
<td></td>
<td>1,414.74</td>
</tr>
</tbody>
</table>

**Sources:** Administrative data, FNS Web site.

**Note:** The SFSP maximum rates per meal that are used in this analysis include both the administrative rate for self-prep sponsors and the operating rate for 2001. Breakfast: $1.4075; lunch/supper: $2.4625; snack: $0.5825. The NSLP/SBP free per-meal reimbursement rates for districts in high need areas in 2001 were as follows: breakfast, $1.37; lunch/supper, $2.11; snack, $0.57. For districts in California, the state meal rate of $0.13 for each breakfast, lunch, and supper served has been included in the NSLP/SBP rate.

*Fresno may have served other meals as well. If so, estimates of the district’s loss are low.*
b. Findings

Losses in 2001 due to the reimbursement rate differential range from approximately $971 in Alisal to $23,223 in Fresno. Losses vary according to the size of the school district and the summer feeding program. To put these figures into context, decreased reimbursement can be compared with the estimated administrative savings the waiver produced in the California districts. Alisal had potential savings of approximately $2,330 due to the streamlined rules and simplified application procedures of the waiver but lost about $971 due to the decreased reimbursement rate. Overall, the waiver produced a small amount of savings ($1,359) for the district. Fresno had potential administrative savings of approximately $10,270 by using the simplified rules but lost about $23,223 due to the lower reimbursement rate, for an overall estimated loss of $12,953.\(^5\)

How significant are these savings and losses? The sixth column of Table II.4 (NSLP Total) shows the total reimbursement the five waiver districts were eligible to receive for meals served during summer 2001. This amount is a rough approximation of the total budget for the Seamless Waiver program in each district.\(^6\) At Alisal, total reimbursement for the waiver sites during the summer was approximately $12,400. Thus, the $1,359 overall savings from the Seamless Waiver represent 11 percent of the budget for the four waiver sites (Alisal also ran the NSLP at several schools in 2001, so the overall summer food service budget was larger). In Fresno, the

\(^5\)In fact, the food service directors in Alisal and Fresno reported in interviews in August that they expected their districts to break even using the Seamless Waiver in 2001. This information may indicate that the estimates of cost savings are imprecise, or it may reflect the flexibility available to the districts in determining which categories various costs are reported in.

\(^6\)It should be considered only an estimate because actual expenses incurred by districts to run the summer feeding program often exceed the amount that they are reimbursed (Ohls et al. 1988).
overall loss of about $12,953 is six percent of the Seamless Waiver budget, which was approximately $233,793 in 2001.

Food service directors in the waiver districts (and in one comparison district) were more concerned about the waiver’s effects on workload and perceived hassle than on costs. However, discussions with other officials and administrators suggest that the decreased reimbursement rate might deter some districts from using the Seamless Waiver. Florida’s SFSP coordinator stated that 1 of the 12 school districts that initially volunteered to be a waiver sponsor for Florida in 2001 withdrew its candidacy because the food service director thought that the district would not be able to cover its costs. The food service director in one of the comparison districts expressed a similar view. She said that the higher reimbursement rate of the regular SFSP allows the district to offer more attractive meals during the summer, and that attractive meals mean a higher number of children attending. Because of the difference in reimbursement rates, she would not choose the Seamless Waiver over the regular SFSP.

D. PROGRAM INTEGRITY

To help determine whether the waiver is being run with less integrity than the regular SFSP, MPR reviewed written reports of sponsors’ visits to meal sites in summer 2001. In addition, researchers visited meal sites in the two California waiver districts, using protocols broadly patterned after SFSP site-monitoring procedures.

A caveat is that the context in which the Seamless Waiver was operating in 2001 and 2002 is ill suited to an investigation of integrity. Due to the program’s demonstration nature, the districts using the waiver were under a high level of scrutiny. For example, public officials and researchers visited the California waiver districts many times during the first two summers of operations. This level of attention, which is atypical for a summer feeding program, potentially could have made the districts more vigilant than usual about site operations and conformance to
program rules. In addition, to some extent, the districts were chosen to run the Seamless Waiver specifically because they were “good” food service providers in the past. In Florida, state SFSP officials selected the districts that ran the waiver program in 2001, out of 12 districts that volunteered. In California, officials of the waiver districts had been in communication with nutrition advocates and officials and helped to develop the waiver request. Therefore, these districts cannot be viewed as representative of average SFSP sponsors, and strong conclusions about the full population of sponsors cannot be based on their experience.

These qualifications having been made, researchers visiting meal sites found that the sites were operating in compliance with program guidelines. There was no evidence that food items were being taken from the service locations. Adults did not appear to be receiving meals, and staff members properly counted and recorded the number of meals served. The sites appeared to follow appropriate food-handling procedures, and the meals served seemed to meet nutritional standards.

Sponsors’ reports of site observations indicated a few instances of children taking incomplete meals (some did not take milk) and of children removing food items from the service site. In general, however, the reports suggested that the waiver sites in 2001 were operating with levels of integrity comparable to those of regular SFSP sites.

E. SUMMARY OF FINDINGS

Overall, there were modest increases in participation associated with the Seamless Waiver in the five districts studied. Most of these changes occurred in 2001, when four districts that would not have otherwise sponsored the SFSP decided to run summer feeding sites using the waiver. Due to the Seamless Waiver, these districts provided meals to children who were not attending school in summer 2001, both at school-based and non-school-based locations. In three of the districts, the waiver also increased the number of feeding sites operated, and these new sites were
in nonschool settings. The school districts would not have sponsored these sites under the regular SFSP, and the sites would not have been eligible for the NSLP. Children who received meals at these sites would not have received summer meals from the school districts without the Seamless Waiver.

In 2002, further increases occurred in the number of feeding sites operated or the number of children fed in four of the five districts. In three of these districts, the number of school sites run under the Seamless Waiver increased. Most children fed at these sites were attending school sessions; however, there were small increases in the number of meal participants who were not attending school. One district increased the number of nonschool sites operated under the waiver. Only one district directly attributed the increases in sites or participation in 2002 to the waiver.

The increases that occurred in 2001 and 2002, as described above, were primarily due to the waiver’s ability to reduce administrative hassle. Among school officials interviewed, there is overwhelming support for the Seamless Waiver’s streamlined rules, which capitalize on school districts’ familiarity with the NSLP. Food service administrators reported less hassle associated with the rules of the waiver, specifically those concerning the times and locations of meal service. The rules on site monitoring, the program application process, and budgeting/claims procedures also were reported to be less burdensome under the waiver than under the regular program.

The waiver produced potential cost savings, but it is not clear that the savings were substantial. In the California waiver districts, estimated potential savings were about $2,330 in Alisal (a small school district) and about $10,270 in Fresno (a much larger district). Savings were a result of the reduced amount of staff time required to conform to program administration rules under the Seamless Waiver. Specifically, the waiver decreased the amount of time required
to complete the program application, monitor feeding sites, complete paperwork and claim forms, and communicate with the state office about changes in meal service.

The districts running the waiver lost varying amounts of potential reimbursement due to the waiver’s use of the lower NSLP/SBP reimbursement rates. Potential losses ranged from $971 to $23,223. Given the rate differential, not all districts may gain financially by using the waiver. Food service directors in most of the districts with whom MPR researchers spoke thought that the decreased workload of the waiver was worth the lower reimbursement rate. In a few other districts, however, it was not. Although it is difficult to predict the extent to which the reduced reimbursement rate will affect sponsorship decisions overall, the decreased rate may be an influential issue.

The waiver did not seem to have any effects on the duration of the summer feeding period (those who developed the waiver did not necessarily expect that it would). Only one of the five waiver districts kept its summer feeding program open later than early August. The relatively short length of summer feeding programs continues to concern nutrition advocates and public officials.

Finally, based on a review of sponsors’ site visit reports from 2001 and on researchers’ visits to sites in 2001 and 2002, there is no evidence that integrity levels were lower at the waiver sites operated by the five districts studied than at regular SFSP meal locations. However, the context in which the waiver was being operated in the five districts in 2001 and 2002 is not well suited to an examination of integrity issues.
REFERENCES


METHODS AND DATA SOURCES

MPR used several qualitative research methods and data collection activities to evaluate operations under the Seamless Waiver. Data were collected from (1) school districts using the waiver in California and Florida beginning in 2001, (2) school districts that sponsored the regular SFSP in 2001 in California, (3) California school districts that did not sponsor the SFSP in 2001, and (4) SFSP officials and advocacy groups. Information for this report was obtained primarily through site visits, in-person and telephone interviews, and analysis of administrative data.

A. SITE VISITS AND INTERVIEWS

MPR researchers went to California to interview key people involved in the Seamless Waiver. These visits occurred in June 2001, August 2001, and July 2002. In June 2001, MPR staff members met with the public officials and advocacy group representatives who helped develop the waiver. These interviews collected information on how and why the waiver was developed, the theory behind how it can affect program participation, and the people involved with it at the district, state, and national levels. During all three visits, MPR staff members interviewed administrators at the school districts operating the Seamless Waiver and visited feeding sites being run under the waiver. In August 2001, MPR researchers visited feeding sites and interviewed administrators at school districts running the regular SFSP that summer.

1. California Seamless Waiver Districts. Three visits were made to each school district using the waiver in California. During each visit, researchers met with the school food service director for the district, who is responsible for administering the feeding program. The directors were interviewed about (1) program staffing, resources, and other costs; (2) paperwork, program rules, and perceived hassle; (3) daily attendance and overall summer participation; (4) unexpected changes caused by the waiver’s rules; (5) changes that occurred in the district’s feeding program between 2001 and 2002; and (6) plans for next summer’s program. Descriptive information
about each school district, its prior involvement with the SFSP, and its current feeding program under the waiver was also collected.

In 2001 and 2002, MPR researchers visited meal sites in both of the California waiver districts. The visits were intended to inform the discussion around whether sites being run under the waiver are being operated any differently, or with less integrity, than regular SFSP sites. Researchers familiarized themselves with USDA site-monitoring procedures before visiting the meal locations.

2. Traditional SFSP Programs. Three California school districts that operated the regular SFSP in 2001 were visited in August 2001. These districts serve as a rough point of comparison for the waiver districts. Information on the SFSP in comparison districts is intended to provide an idea of the administrative costs, workload, perceived hassle, participation levels, and other aspects associated with the traditional program. However, direct comparisons between Seamless Waiver and regular SFSP districts in terms of meal attendance and program costs are generally not appropriate, due to differences in district enrollment levels and variations in the size of the districts’ summer feeding programs.

Food service directors at comparison locations were asked the same types of questions as those asked in waiver districts. These included questions about the costs and workload associated with running the regular program, perceived hassle, participation levels, and unexpected changes. Researchers described the Seamless Waiver to food service directors and asked them whether they found the waiver’s rules attractive and whether the waiver would lead them to change their current program in any way.

To select the comparison districts, MPR examined data from the U.S. Department of Education’s Common Core of Data for all school districts in central and northern California that sponsor the SFSP. Specifically, the percentage of children living in poverty within a district and
the percentage eligible for free and reduced-price lunches (and therefore living at or below 185 percent of the poverty level) were examined. These data were used to identify districts similar in poverty level to those operating under the waiver. Enrollment was also taken into consideration when matching; however, the comparison districts that were similar to the waiver districts in poverty level were not very similar in enrollment. Six districts were identified as potential comparison sites, and final selections were based on the availability of district food service directors to meet with researchers.

**B. COST COMPARISONS**

MPR used interviews to obtain information about program costs in 2001 for the California waiver districts. During site visits, detailed information was collected on the number of staff hours saved by using the Seamless Waiver instead of the regular SFSP. Researchers asked the food service directors detailed questions about how much time they saved on each aspect of administering the program by using the waiver instead of the regular SFSP (aspects included the application procedure, monitoring sites, and completing paperwork and claim forms). Time savings were multiplied by salary levels to build up estimates of cost savings within the SFSP budget.1

Administrators in both districts were familiar with the regular SFSP. In one district, the food service director had run the SFSP in 2000. In the other, the director had run the traditional program in the past and was familiar with the rules. Nevertheless, because the directors received the waiver, they had never planned to run the regular SFSP in 2001; therefore, it is unlikely that

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1 MPR’s discussion and analysis of costs focuses on the budget for the summer feeding program only. School food authorities also have budgets for programs including the School Breakfast and the National School Lunch programs.
their estimates are very precise. Still, they provide a rough idea of the cost savings associated with the Seamless Waiver.

The waiver has a lower per-meal reimbursement rate than the regular SFSP; therefore, researchers compared administrative savings from the waiver with the decreased amount of reimbursement. The latter amount was determined by multiplying the total number of meals served during the summer by the SFSP reimbursement rate and by the NSLP/SBP rates and determining the difference between the two products.

The SFSP reimbursement rate varies. Sponsors that prepare their own meals and those in rural locations receive a slightly higher administrative reimbursement rate than other sponsors. The five districts that began using the waiver in 2001 all prepare their own meals; therefore, they all would have received the slightly higher reimbursement rate for breakfasts, lunches, and snacks if they had used the SFSP instead of the Seamless Waiver, and this is the rate we used in our analysis.

NSLP/SBP reimbursement rates vary according to whether a district is in a highly disadvantaged area. In our analysis, we used the NSLP reimbursement rate for free lunches served in districts where more than 60 percent of students qualify for free or reduced price meals because the districts running the waiver have high percentages of free and reduced price eligible children (see Table I.1). For breakfasts, we used the severe need rate.²

California provides supplemental statewide reimbursement to sponsors for meals (but not snacks) served under the NSLP/SBP. In addition to the USDA reimbursement rate, sponsors receive an extra $0.13 for every breakfast and lunch served. Since the Seamless Waiver is

²Both of the waiver districts in California reported receiving severe need rates for breakfasts served in the SBP.
reimbursed using NSLP rates, meals served under the waiver also receive the special
reimbursement. Regular SFSP meals do not receive the statewide reimbursement. Thus, in
California, the difference between the SFSP reimbursement rate and the combined federal and
state reimbursement rates for the School Breakfast and National School Lunch programs is not as
large as it would be normally.3 (Note that, although the current analysis takes into account
California’s unique statewide reimbursement, school districts using the waiver in other states do
not receive this additional rate.)

C. TELEPHONE INTERVIEWS

1. SFSP Nonparticipants. To gauge the extent to which administrative costs, workload, and
perceived hassle influence school districts’ decisions about sponsoring the regular SFSP, MPR
identified and called personnel at 10 school districts in California that did not participate in the
program in 2001. These calls took place during September 2001. MPR asked food service
directors (and, in one case, an assistant director) at these districts (1) why the school district does
not sponsor the regular SFSP; (2) whether it had ever been a sponsor and, if so, why it had
stopped; (3) whether they were aware of other organizations in the community that run the SFSP;
and (4) whether the district serves meals through the NSLP or other nutrition programs during
the summer. If administrative costs or program regulations had affected the district’s decision
not to participate in the SFSP, the director was asked whether rules like those associated with the
Seamless Waiver might induce them to consider sponsoring the program in the future.

To select the nonsponsors, MPR examined data from the U.S. Department of Education’s
Common Core of Data for all school districts in California. First, to identify districts that would

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3 In fact, when the federal and California state reimbursements for breakfast are considered
together, the reimbursement rate for breakfasts served in California is higher under the School
Breakfast Program than it is under the SFSP.
be likely candidates to sponsor the SFSP, the level of child poverty existing in each district’s enrollment area was examined. To be able to run the summer program with open sites, school districts must demonstrate that a threshold level of need exists in the communities they serve. Of the districts with the highest levels of poverty in the state, 20 were chosen that (1) reflect a variety of enrollment sizes (ranging from 2,799 to 53,805 students), and (2) did not sponsor the SFSP in summer 2000 or summer 2001. After obtaining contact information for the 20 districts, MPR sent a letter to the food service directors about MPR’s evaluation, then followed up with telephone calls. The food service directors interviewed were those available when an MPR researcher called.

All 10 school districts whose personnel were interviewed run the NSLP during the summer. Six districts have year-round schooling, although not all schools in these districts operate on a year-round basis. All 10 districts have traditional summer school classes.

2. Florida Seamless Waiver Districts. Information about the three school districts that began operating the Seamless Waiver in 2001 in Florida was also collected, through telephone interviews. In 2001, MPR researchers spoke with the Florida SFSP coordinator, who runs the program in that state, about how the waiver got started in Florida and how school districts there are reacting to it. The food service directors in the three waiver districts were interviewed in 2001 and 2002 about their reasons for choosing to operate the Seamless Waiver instead of the regular SFSP, their experiences using the waiver (including program costs, workload, perceived hassle, and unexpected consequences), changes that occurred in the district’s feeding program between 2001 and 2002, and their plans for next summer. Descriptive data about the districts were also collected.
D. ADMINISTRATIVE DATA

Data from 2001 were collected from the five school districts running the Seamless Waiver. Specifically, information on program costs (staffing and resources), participation levels, and reimbursement was obtained. Researchers also reviewed written reports of sponsors’ visits to sites in 2001. Administrative data were collected in collaboration with FNS.
This appendix provides background and descriptive information about the school districts that began using the Seamless Waiver in 2001 in California and Florida. It also provides this information for the comparison school districts that operated the traditional SFSP in 2001.\(^1\)

### A. SEAMLESS WAIVER DISTRICTS

#### 1. California Sites

##### a. Alisal Union Elementary School District

The Alisal Union Elementary School District, which serves the eastern part of the city of Salinas, California, is made up of 10 elementary schools. Although Salinas is a fairly large city, with 151,060 residents, Alisal’s food service director characterized the eastern corner as having a rural feel. Alisal is primarily an agricultural area, and migrant workers and their families make up a large proportion of the community’s inhabitants.

District enrollment is 7,926, and 88 percent of students are eligible for free or reduced-price lunches during the year. Some of the district’s schools were on year-round schedules until 2002; however, Alisal returned all schools to the traditional calendar for the 2002-2003 school year.

During summer 2001, the district used the NSLP to feed students attending summer school and year-round classes. Alisal also operated the Seamless Waiver at four recreation sites to feed children who were not in school. From late June through August 2001, the waiver sites served both lunches and snacks. The sites also served meals or snacks throughout the year. The recreation sites were open sites, where all children received free meals. In June, lunch

\(^1\)Population data for school districts operating the Seamless Waiver and for comparison districts are from the 2000 Census. District enrollment figures and the number of schools per district are from the U.S. Department of Education’s Common Core of Data, National Public School District Locator (2000-2001 school year). Data on the number of students eligible for free and reduced-price lunches are from the U.S. Department of Education’s Common Core of Data, Local Educational Agency and School Universe Survey Longitudinal File (1997-1998). All other information is from interviews with district food service directors.
attendance varied from 19 children per day at the smallest recreation site to 41 children at the largest.

In 2002, Alisal switched all 10 school-based feeding sites from operating under the NSLP to operating under the Seamless Waiver. The schools served breakfast and lunch, and some also served snacks. A small number of children (about five a day) who were not attending classes received meals at these sites, which were open to the entire community. Daily lunch attendance in July ranged from approximately 100 to 500 students per site. The sites served summer meals from late June to late July or early August. In addition to the school sites, Alisal sponsored the four recreation sites again in 2002. Daily participation at these sites in July ranged from 15 to 50 children per site, both for lunches and snacks. The sites served snacks year-round and served lunch from mid-June to mid-August.

b. Fresno Unified School District

Fresno is the commercial hub of the agricultural San Joaquin Valley area of central California. The city has a population of 427,652. The residents are from diverse backgrounds (but generally have low incomes) and are highly mobile (many are migrant workers).

Fresno Unified School District is made up of 99 schools that serve a total of 79,007 students. About 70 percent of the students are eligible to receive free or reduced-price meals during the year. Fresno’s elementary schools run on a year-round schedule of 90-day academic sessions followed by 30-day vacation periods. Middle schools and high schools follow the traditional school year.

In 2001, the district operated the Seamless Waiver at 26 sites. The program ran for about six weeks at each location. Twenty-five sites were schools with year-round courses or summer school classes in session. Children not attending school (“walk-ins”) had low rates of participation at the school-based feeding sites. Fresno’s food service director estimated that no
more than about 10 to 15 walk-ins received meals each day at any given school site. The 26th location was a recreation center that organizes activities for children who are not in school. In addition to the Seamless Waiver, the district ran the NSLP at schools that did not meet the income eligibility guidelines for the Seamless Waiver (which are the same as the income eligibility guidelines for the regular SFSP).

In 2002, Fresno sponsored 29 school sites under the waiver, as well as the recreation site that it had sponsored in 2001. The district also used the NSLP to feed summer students at 45 school sites. Eight of the school sites operated under the Seamless Waiver served breakfast and lunch, and the rest served lunch from early June to mid-July.

c. **Provision 2**

Both Alisal and Fresno school districts use Provision 2 of the NSLP during the school year. Districts that have a large proportion of students who are eligible for free or reduced-price meals may use Provision 2. It allows these schools to serve free meals to all children and to claim reimbursement on the basis of the percentages of free, reduced-price, and paid meals claimed in a designated “base year.” Schools that do not use Provision 2 must determine how many students are eligible for free and reduced-price meals every year, usually by collecting applications from individual families. They also must keep track of how many eligible and noneligible students receive lunches and must do so in such a way that children in the food line are unable to determine each other’s eligibility status.
2. **Florida Sites**

a. **DeSoto County School District**

   DeSoto County School District is made up of 12 schools, including one early education center. The district serves a rural area, where many residents are migrant workers. Enrollment is 4,618 students. DeSoto County has a population of 32,209.

   DeSoto held summer school classes at two sites during 2001 and used the Seamless Waiver to feed children at those locations. The program ran for about 20 days. Daily meal participation averaged 68 for breakfast and 189 for lunch at the two sites combined. The food service coordinator reported that participation by walk-ins was low: many families in the DeSoto enrollment area travel north for work during the summer.

   In 2002, the district’s summer feeding program generally remained the same. One of the two school-based feeding sites served approximately 20 children a day from a work development program. Few children who were not attending classes or the work development program attended meal services. Average daily attendance during the summer was 140 children, and sites were open for about 20 days.

b. **Dixie County School District**

   Dixie is the smallest of the three Florida school districts sponsoring the waiver. It has four school buildings and 2,305 students. Dixie County has a total population of 13,827. The food service coordinator for the district describes the enrollment area as “very rural.”

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2 None of the Florida districts running the Seamless Waiver has schools on year-round schedules. As of 2001, none were using Provision 2.
Dixie operated nine meal sites under the Seamless Waiver in June and July 2001. Two were schools, where meal service took place in conjunction with summer school classes. Most participants at these sites were students; walk-ins were uncommon. The other sites were churches, government buildings, and a Head Start program. Most sites served lunch, but two churches served supper instead. In addition to lunch, one site served breakfast in 2001. The food service director reported that the nonschool sites were easier for community members to get to. Average daily participation at Dixie’s sites ranged from 18 to 89 for lunch, was approximately 55 for supper, and was 14 at the one site that served breakfast.

In 2002, Dixie’s summer feeding program grew to 12 sites. Three were at schools, and nine were in nonschool settings, including recreation centers. All sites served lunches, and one also served breakfast. Average daily attendance was 534 total, and sites were open from the beginning of June until July 25. The district may consider adding even more sites in 2003.

c. Volusia County School District

Volusia County has a population of 443,343. The school district accommodates a total of 61,517 children. The assistant director of food services reports that the area the district serves is largely suburban, with rural “pockets.” The district served meals at 18 schools under the Seamless Waiver from late May until mid-August 2001. All schools served lunch, and many schools also served breakfast. A few sites offered snacks. Nine of the schools operated summer school classes during the day, and meal participation by walk-ins was low. The other nine schools offered recreational programs and activities. Lunch participation at Volusia’s meal sites varied widely, from 30 children at the smaller locations to several hundred at the larger, summer school sites.

In 2002, due to the district’s participation in a Title I enrichment program at many of the schools, Volusia’s summer feeding program expanded to 27 sites. All sites were school-based,
and all but one served breakfast in addition to lunch. Because a mixture of regular summer school classes, the new enrichment program, and recreational activities occurred at the sites, the director did not know how many of the 27 schools would have been eligible to run the NSLP if the Seamless Waiver had not been available. Total lunch attendance for all days in June was 36,310; for breakfast, it was 30,500. Sites were open for varying lengths of time, from early to mid-June to differing times in July.

B. COMPARISON SFSP PROGRAMS

Three school districts in California that operated the regular SFSP in 2001 were included in this study. These districts serve as a rough point of comparison with the waiver districts. Information on them is intended to provide an idea of program administration and operations under the regular SFSP.

1. Alum Rock Union Elementary School District

Alum Rock is a town of 16,890 people that borders the eastern side of the city of San Jose, California. The residents are mainly low- and middle-income families, a large proportion of whom are Hispanic, Asian, or African American. Nineteen elementary schools and 6 middle/high schools are part of the Alum Rock Union Elementary School District, which serves Alum Rock and the surrounding areas. The district’s enrollment is 15,886 students, and 77 percent are eligible for free or reduced-price meals. There is no year-round schooling, and the district does not use Provision 2.

For four weeks during summer 2001, breakfast was served at 13 schools through the SFSP. Meal service took place around 10:30 A.M., in the middle of the summer school day. The acting food service director for the district believes that serving meals in the morning increased the number of school students participating in the summer food program but decreased the number
of walk-ins, for whom 10:30 A.M. may have been too early. She estimated that walk-ins accounted for about 10 percent of the 200 to 350 children who received meals daily. One school used the NSLP instead of the SFSP because it did not meet the low-income criteria. At this school, only children who were attending classes were fed.

2. Farmersville Unified School District

Farmersville, California, is an agriculturally based community of 6,235 residents, many of whom are migrant workers. The town is on the outskirts of Visalia, a larger city to the north. Farmersville Unified School District is made up of three schools serving grades K-12, with a total of 2,100 students. The town is small enough that half the students can walk to school. Ninety percent are eligible to receive free or reduced-price meals, and the district uses Provision 2 of the NSLP. Farmersville does not have year-round schooling.

The district operated the regular SFSP at its three schools in summer 2001. The feeding schedule corresponded to the summer school schedule, and attendance by walk-ins was low. According to Farmersville’s food service director, the district served an estimated 650 lunches daily, but walk-ins accounted for only 50 to 60 of the children receiving meals.

3. Winton Elementary School District

The town of Winton, California, is located northwest of the medium-sized city of Merced and has 7,559 residents. Like many of the areas in the central valley of California, Winton is primarily an agricultural town.

Winton Elementary School District is made up of three schools and has an enrollment of 1,687 students, more than half of whom are Hispanic, according to the food service director. All three schools use the traditional school-year calendar. Ninety-five percent of the children in the
enrollment area are eligible to receive free or reduced-price meals. The district uses Provision 2 of the NSLP.

Winton operated the SFSP at all three schools during summer 2001 in conjunction with summer school classes and summer activity programs. Lunches were served after summer school classes concluded and before afternoon recreational activities began, for about six weeks. In July, average meal attendance at the three schools combined was 418 daily. Walk-ins accounted for about 10 to 20 percent of the participants. One meal site remained open after summer school ended for the year and averaged 100 children a day.