



# SPECIAL NUTRITION PROGRAM OPERATIONS STUDY (SN-OPS) SY 2013-14 REPORT

Food and Nutrition Service · Office of Policy Support · United States Department of Agriculture

Prepared by:

**2M Research Services, LLC**  
500 E Border St, Suite 680  
Arlington, TX 76010

Phone: 855.328.1611  
Fax: 866.250.2447  
Email: [jmurdoch@2mresearch.com](mailto:jmurdoch@2mresearch.com)  
Website: [www.2mresearch.com](http://www.2mresearch.com)



**RESEARCH  
SERVICES, LLC**

USDA is an Equal Opportunity Provider

# Special Nutrition Program Operations Study (SN-OPS)

SY 2013–14 Report

October 2016

Contract # AG-3198-C-14-0001

Office of Policy Support  
Food and Nutrition Service  
United States Department of Agriculture  
Project Officer: Toija Riggins  
Telephone: (703) 305-2309

# Authors and Contributors:

## Authors

---

Jim Murdoch	<i>2M Research Services</i>
Angela Campbell	<i>2M Research Services</i>
Elizabeth Condon	<i>Mathematica Policy Research</i>
Mary Kay Fox	<i>Mathematica Policy Research</i>
Roderick Harrison	<i>2M Research Services</i>
Morgan Miller	<i>2M Research Services</i>
Katherine Niland	<i>Mathematica Policy Research</i>
Yiqi Shen	<i>2M Research Services</i>

## Contributors

---

Noureen Akber	<i>2M Research Services</i>
Christina Davis	<i>2M Research Services</i>
Anne Gordon	<i>Mathematica Policy Research</i>

## Acronyms Used in Report

Acronym	Name
<b>ADA</b>	Average Daily Attendance
<b>AR</b>	Administrative Review
<b>BEN</b>	Cornell Center for Behavioral Economics in Child Nutrition Programs
<b>CACFP</b>	Child and Adult Care Food Program
<b>CAP</b>	Corrective Action Plan
<b>CCD</b>	Common Core of Data
<b>CDC</b>	Centers for Disease Control and Prevention
<b>CEP</b>	Community Eligibility Provision
<b>CHAID</b>	Chi-Squared Automatic Iteration Detection
<b>CN</b>	Child Nutrition
<b>CPI</b>	Consumer Price Index for All Urban Consumers
<b>F/RP</b>	Free or Reduced-Price Meals
<b>FA</b>	Fiscal Action
<b>FBMP</b>	Food-Based Menu Planning
<b>FDA</b>	Food and Drug Administration
<b>FDPIR</b>	Food Distribution Program on Indian Reservations
<b>FFVP</b>	Fresh Fruit and Vegetable Program
<b>FMNV</b>	Foods of Minimal Nutritional Value
<b>FNS</b>	Food and Nutrition Service
<b>FPC</b>	Finite Population Correction
<b>FPRS</b>	Food Program Reporting System
<b>FSIS</b>	Food Safety Inspection Service
<b>FSMC</b>	Food Service Management Company
<b>FTP</b>	File Transfer Protocol
<b>FY</b>	Fiscal Year
<b>GPO</b>	Group Purchasing Organization
<b>HACCP</b>	Hazard Analysis and Critical Control Points
<b>HHFKA</b>	Healthy, Hunger-Free Kids Act
<b>HUSSC</b>	Healthier US Schools Challenge
<b>IOM</b>	Institute of Medicine
<b>ISP</b>	Identified Student Percentage
<b>IT</b>	Information Technology
<b>JKn</b>	Jackknife
<b>LEA</b>	Local Educational Agency
<b>NCES</b>	National Center for Education Statistics
<b>NSLA</b>	National School Lunch Act
<b>NSLP</b>	National School Lunch Program
<b>OVS</b>	Offer Versus Serve
<b>PLE</b>	Paid Lunch Equity
<b>RO</b>	Regional Offices
<b>SA</b>	State Agency
<b>SAE</b>	State Administrative Expense
<b>SBP</b>	School Breakfast Program
<b>SDA</b>	State Distributing Agency

<b>Acronym</b>	<b>Name</b>
<b>SEA</b>	State Education Agency
<b>SFA</b>	School Food Authority
<b>SFSP</b>	Summer Food Service Program
<b>SMARRT</b>	School Meals Administrative Review Reinvention Team
<b>SNA</b>	School Nutrition Association
<b>SNAP</b>	Supplemental Nutrition Assistance Program
<b>SNDA</b>	School Nutrition Dietary Assessment Study
<b>SN-OPS</b>	Special Nutrition Program Operations Study
<b>SPO</b>	Special Provision Options
<b>SSO</b>	Seamless Summer Option
<b>SY</b>	School Year
<b>TA</b>	Technical Assistance
<b>TANF</b>	Temporary Assistance for Needy Families
<b>USDA</b>	U.S. Department of Agriculture
<b>VSR</b>	Verification Summary Report
<b>WAP</b>	Weighted Average Price
<b>WIC</b>	Special Supplemental Nutrition Program for Women, Infants, and Children

# Table of Contents

<b>Table of Contents</b> .....	<b>i</b>
<b>List of Tables</b> .....	<b>v</b>
<b>List of Figures</b> .....	<b>xi</b>
<b>1 Executive Summary</b> .....	<b>1</b>
1.1 Participation .....	2
1.1.1 Participation in CN Programs .....	2
1.1.2 Participation in the Special Assistance Alternatives.....	3
1.1.3 Participation of Charter Schools in the NSLP and the SBP .....	5
1.2 Healthy Meals.....	6
1.2.1 Updated Meal Patterns .....	6
1.2.2 Smarter Lunchrooms.....	7
1.2.3 Farm to School Activities.....	8
1.2.4 Meal Prices.....	10
1.3 Administration of the NSLP and the SBP .....	12
1.3.1 Administrative Review Process .....	12
<b>2 Overview of the Special Nutrition Program Operations Study</b> .....	<b>14</b>
2.1 Topics Covered in SN-OPS in SY 2013–14 .....	17
2.2 Data Collection Procedures .....	19
2.3 SFA Sample Selection, Weights, and Adjustments .....	20
2.4 Presentation of Results and Statistical Tests.....	23
2.5 Limitations of the Study .....	25
<b>3 Participation in the NSLP, the SBP, and Other Child Nutrition Programs</b> .....	<b>26</b>
3.1 Background.....	26
3.1.1 The NSLP and the SBP .....	26
3.1.2 Afterschool Snack Programs.....	27
3.1.3 At-Risk Supper Program .....	27
3.1.4 Seamless Summer Option .....	28
3.2 Research Questions .....	28
3.3 Results .....	29

3.3.1	SFA and School Participation in the NSLP and the SBP .....	29
3.3.2	Percent of Students Approved for Free or Reduced-Price Meals.....	34
3.3.3	Seamless Summer Option .....	40
3.3.4	Average Daily Attendance and Number of Serving Days.....	43
3.3.5	Formats of the Application that Parents Use to Apply for Free or Reduced-Price School Meals for Their Children.....	43
3.3.6	Determination of Eligibility by Basis of Eligibility .....	44
3.3.7	Integration with Other Online Systems for SFAs Where the Primary Format of the Application for Free or Reduced-Price Meals is Web- or Computer-Based .....	45
3.3.8	Source of Development of the Web- or Computer-Based Application System.....	46
<b>4</b>	<b>Special Assistance Alternatives and Charter Schools .....</b>	<b>48</b>
4.1	Special Assistance Alternatives.....	48
4.1.1	Background .....	48
4.2	Research Question.....	49
4.3	Results .....	50
4.4	Charter Schools .....	56
4.4.1	Background .....	56
4.5	Research Questions .....	56
4.6	Results .....	56
<b>5</b>	<b>Updated Meal Requirements .....</b>	<b>59</b>
5.1	Background.....	59
5.2	Research Questions .....	62
5.3	Results .....	63
5.3.1	General Implementation of the Updated Meal Requirements .....	63
5.3.2	Implementation of Specific Requirements.....	71
<b>6</b>	<b>Smarter Lunchrooms .....</b>	<b>94</b>
6.1	Background.....	94
6.2	Research Questions .....	95
6.3	Results .....	95
6.3.1	Awareness and Training .....	95
6.3.2	Use of Smarter Lunchrooms Strategies.....	97
<b>7</b>	<b>SFA Operations .....</b>	<b>106</b>
7.1	Use of Food Service Management Companies and Cooperative Purchasing Agreements .....	106

7.1.1	Background .....	106
7.1.2	Research Questions.....	107
7.1.3	Results .....	107
7.2	USDA Foods .....	116
7.2.1	Background .....	116
7.2.2	Research Questions.....	117
7.2.3	Results .....	117
7.3	Farm to School Activities .....	119
7.3.1	Background .....	119
7.3.2	Research Questions.....	120
7.3.3	Results .....	120
7.4	Food Safety.....	125
7.4.1	Background .....	125
7.4.2	Research Questions.....	126
7.4.3	Results .....	126
<b>8</b>	<b>School Food Authority Financials .....</b>	<b>135</b>
8.1	Meal Prices .....	135
8.1.1	Background .....	135
8.1.2	Research Questions.....	139
8.1.3	Results .....	139
8.2	SFA Revenues and Costs .....	162
8.2.1	Background .....	162
8.2.2	Research Questions.....	163
8.2.3	Results .....	163
<b>9</b>	<b>State Policies and Finances: Administration of the NSLP and the SBP.....</b>	<b>174</b>
9.1	Administrative Review Process.....	174
9.1.1	Overview of Administrative Review (AR) Process .....	174
9.1.2	Review Procedures and Considerations .....	176
9.1.3	Research Questions.....	177
9.1.4	Results .....	178
9.2	State Data Systems .....	183
9.2.1	Overview of State Data Systems Survey.....	183
9.2.2	Research Questions.....	184

9.2.3	Results .....	185
9.3	Budget Issues.....	192
9.3.1	Background .....	192
9.3.2	Research Questions.....	194
9.3.3	Results.....	194
<b>10</b>	<b>Conclusion.....</b>	<b>205</b>
<b>Appendix A</b>	<b>SFA Director Survey SY 2013–14.....</b>	<b>A-1</b>
<b>Appendix B</b>	<b>State Director Survey SY 2013–14 .....</b>	<b>B-1</b>
<b>Appendix C</b>	<b>School Food Authority Sample and Sample Weights.....</b>	<b>C-1</b>
<b>Appendix D</b>	<b>Supplemental Tables .....</b>	<b>D-1</b>

# List of Tables

TABLE 1.1	State Agency CN Directors’ Evaluation of the Updated Administrative Review Process Compared to Previous Processes, SY 2013–14.....	13
TABLE 2.1	SFA Director Module Overview: SY 2011–12, 2012–13, and 2013–14.....	16
TABLE 2.2	State CN Director Survey Module Overview: SY 2011–12, 2012–13, and 2013–14.....	16
TABLE 2.3	Categorization of SFA Sample Responses: SN-OPS, SY 2013–14.....	20
TABLE 2.4	Distributions of the Sampling Frame and Sample Over Several Characteristics of SFAs: SN-OPS, SY 2013–14 SFA Director Survey.....	22
TABLE 2.5	Percentage of SFAs That Changed the Types and Amounts of USDA Foods in Order to Meet Updated Meal Requirements, by SFA Characteristics, SY 2012–13 and SY 2013–14 (Example).....	25
TABLE 3.1	Percentage of SFAs With All Schools Within Each Grade Level Participating in the NSLP and the SBP, SY 2011–12, SY 2012–13, and SY 2013–14.....	30
TABLE 3.2	Among SFAs That Participate in the SBP, the Percentage That Receive SBP Severe Need Reimbursement, SY 2011–12, SY 2012–13, and SY 2013–14.....	32
TABLE 3.3	Percentage of SFAs Participating in the SBP as Severe Need Schools, by SFA Characteristics, SY 2013–14.....	33
TABLE 3.4	Percentage of Students Approved for Free Meals, SY 2011–12, SY 2012–13, and SY 2013–14.....	35
TABLE 3.5	Percentage of Students Approved for Reduced-Price Meals, SY 2011–12, SY 2012–13, and SY 2013–14.....	35
TABLE 3.6	Percent of SFAs Participating in the Afterschool Snack Program, by SFA Characteristics, SY 2013–14.....	37
TABLE 3.7	Estimated Number of Schools Participating in the Afterschool Snack Program, as Reported by SFAs, SY 2013–14.....	38
TABLE 3.8	Percentage of SFAs Participating in the At-Risk Supper Program, by SFA Characteristics, SY 2013–14.....	39
TABLE 3.9	Number of Schools Participating in the At-Risk Supper Program, SY 2013–14.....	40
TABLE 3.10	Number of Schools That Participated as Seamless Summer Option Sites in Summer 2013.....	40
TABLE 3.11	Percentage of SFAs Participating in the Seamless Summer Option, by SFA Characteristics, Summer 2013.....	42
TABLE 3.12	The Average Daily Attendance Rate for October 2013, SY 2013–14.....	43
TABLE 3.13	Number of Serving Days for Breakfast and Lunch in SY 2013–14.....	43

TABLE 3.14	Formats of the Application That Parents Used to Apply for Free or Reduced-Price School Meals for Their Children, as Reported by SFAs, SY 2013–14 .....	44
TABLE 3.15	Determination of Eligibility for Free or Reduced-Price School Meals, by Basis of Eligibility, as Reported by SFAs, SY 2013–14 .....	45
TABLE 3.16	Percentage of SFAs with Integration With Other Online Systems for SFAs, Where the Primary Format of the Application for Free or Reduced-Price Meals is Web- or Computer-Based, SY 2013–14 .....	46
TABLE 3.17	Source of Development for the SFAs Where the Primary Format of the Application for Free or Reduced-Price Meals is a Web-Based or Computer-Based Application System, SY 2013–14 .....	46
TABLE 4.1	The Number and Percentage of States That had SFAs With Schools Operating Under Provisions 1, 2, 3, or CEP, as Reported by State CN Directors, SY 2013–14 .....	50
TABLE 4.2	The Number and Percentage of SFAs and Schools That Operated Under Provisions 1, 2, 3, or CEP, as Reported by State CN Directors, SY 2013–14 .....	51
TABLE 4.3	The Number and Percentage of SFAs and Schools That Operated Under Provisions 1, 2, 3, or CEP, as Reported by State CN Directors for SY 2011–12, SY 2012–13, and SY 2013–14 .....	53
TABLE 4.4	Among States Participating in CEP, the Number and Percentage of SFAs and Schools Operating Under Provision 2 and Community Eligibility Provision, as Reported by State CN Directors, SY 2012–13 and SY 2013–14.....	55
TABLE 4.5	Presence of Charter Schools, SY 2012–13 and SY 2013–14.....	57
TABLE 4.6	Among States With Charter Schools, the Percentage of Charter Schools That Participated in the NSLP and the SBP and Whether They Operated as a Separate SFA, SY 2011–12, SY 2012–13, and SY 2013–14.....	58
TABLE 5.1	Updated Meal Requirements for the NSLP and the SBP .....	59
TABLE 5.2	Implementation Timeline for Updated Meal Pattern Requirements .....	61
TABLE 5.3	Reasons Cited by SFAs for Not Submitting Certification Materials for the Additional 6-Cents Reimbursement, SY 2013–14.....	64
TABLE 5.4	Percentage of SFAs Using the USDA Best Practices Sharing Center Web Site to Assist With Menu Changes, by SFA Characteristics, SY 2013–14 .....	65
TABLE 5.5	Percentage of SFAs That Changed the Types and Amounts of USDA Foods in Order to Meet Updated Meal Requirements, by SFA Characteristics, SY 2012–13 and SY 2013–14 .....	66
TABLE 5.6	Practices Employed by SFAs to Meet the 50 Percent Whole Grain-Rich Requirements for Breakfast and Lunch, SY 2013–14.....	74
TABLE 5.7	Changes in the Frequency of Using Fruit or Vegetable Products for Lunch Since the Implementation of the Updated Meal Pattern Requirements, as Reported by SFAs, SY 2013–14 .....	77

TABLE 5.8	Percentage of SFAs Having Difficulty Purchasing Vegetables, by SFA Characteristics, SY 2013–14 .....	79
TABLE 5.9	Reasons SFAs Had Difficulty Purchasing One or More Vegetable Subgroups, Among Those Reporting Difficulties, by SFA Characteristics, SY 2013–14.....	81
TABLE 5.10	Actions That SFAs Have Taken to Meet Students’ Needs or Wants for Additional Foods, by Grade Level, SY 2013–14.....	85
TABLE 5.11	Percentage of SFAs That Knew Sodium Content of Meals, by SFA Characteristics, SY 2012–13 and SY 2013–14.....	86
TABLE 5.12	Average Sodium Content of Breakfasts and Lunches by Grade Level, Among SFAs That Know the Sodium Content of Their Meals.....	87
TABLE 5.13	Percentage of SFAs Meeting Intermediate and Final Sodium Targets by Grade Level, SY 2012–13 and SY 2013–14.....	88
TABLE 5.14	Percentage of SFAs Observing Changes in the Amount of Plate Waste at Lunch Since Implementation of the Updated Meal Requirements, SY 2012–13 and SY 2013–14.....	91
TABLE 5.15	Percentage of SFAs Indicating Particular Reasons for Observed Change in Plate Waste, SY 2013–14.....	92
TABLE 6.1	Awareness and Training Regarding the Smarter Lunchrooms Movement, as Reported by SFAs, SY 2013–14 .....	96
TABLE 6.2	Percentage of SFAs Reporting That All/Some of Their Schools Used at Least One Smarter Lunchrooms Strategy in Multiple Strategy Categories and Estimated Number of Schools, SY 2013–14.....	101
TABLE 6.3	Percentage of SFAs Reporting Their Schools’ Use of Smarter Lunchrooms Strategies During SY 2013–14.....	103
TABLE 6.4	Percentage of SFAs Reporting Their Schools’ Usage of Strategies to Encourage Consumption of a Reimbursable Meal during SY 2013–14 .....	104
TABLE 6.5	Percentage of SFAs Reporting That Some or All of Their Schools Implemented At Least One Smarter Lunchroom Strategy in SY 2013–14 .....	105
TABLE 7.1	Among SFAs That Used FSMCs, the Number and Percentage of SFAs That Used National, Regional, and Local FSMCs, as Reported by State CN Directors, SY 2011–12, SY 2012–13, and SY 2013–14.....	108
TABLE 7.2	Percentage of SFAs Using Food Service Management Companies and Cooperative Purchasing Agreements to Manage the Procurement of USDA Foods and Commercial Products, SY 2013–14 .....	110
TABLE 7.3	Mechanisms Used to Oversee Contracts and Agreements Among SFAs That Use a Foodservice Management Company or Cooperative Purchasing, SY 2013–14.....	111
TABLE 7.4	SFA Use of Advisory Councils, Whether Advisory Councils Gather Information, and Whether Advisory Councils are Elected, SY 2013–14 .....	112

TABLE 7.5	Use of Advisory Councils to Guide Food Purchasing, by SFA Characteristics, SY 2013–14 .....	113
TABLE 7.6	Circumstances That Triggered Review of Cooperative Purchasing Agreements, GPO Contracts, and FSMC Contracts, in States That Conditionally Reviewed These Agreements and Contracts, SY 2013–14.....	115
TABLE 7.7	Operational Issues Relating to the USDA Foods Program, as Reported by State CN Directors, SY 2012–13 and SY 2013–14 .....	118
TABLE 7.8	Percentage of SFAs With Schools That Participated in Farm to School Activities by SFA Characteristics, SY 2013–14 .....	122
TABLE 7.9	Percentage of SFAs Reporting Frequency of Meals and/or Snacks That Include at Least One Locally Sourced Food Item, SY 2013–14.....	123
TABLE 7.10	Among SFAs With Schools Participating in Farm to School Activities in SY 2012–13, the Proportion of Total Food Costs Spent on Locally Sourced Foods and Anticipated Changes, SY 2013–14 .....	125
TABLE 7.11	Locations Where SFAs Serve Food to Students, by SFA Characteristics, SY 2013–14 ....	128
TABLE 7.12	Staff That Served Food to Students, SY 2013–14 .....	130
TABLE 7.13	Percentage of SFAs That Permit Outside Groups to Use SFA Kitchens Without Oversight from School Nutrition Staff.....	131
TABLE 7.14	Policy Regarding When Employees With Diarrhea or Vomiting Are Allowed To Return to Work, by SFA Characteristics, SY 2013–14 .....	133
TABLE 7.15	Availability of Paid Sick Leave for Food Service Employees, SY 2013–14.....	134
TABLE 8.1	Reimbursement Rates for the NSLP and the SBP, SY 2009–10 to SY 2013–14.....	138
TABLE 8.2	Average Price Charged by SFAs for a Full-Price Student Lunch, by Grade Level (Elementary, Middle, High) and SFA Characteristics, SY 2009–10 to SY 2013–14.....	143
TABLE 8.3	Average Price Charged by SFAs for a Full-Price Student Lunch in Other Schools by SFA Characteristics, SY 2009–10 to SY 2013–14 .....	144
TABLE 8.4	Average Price Charged by SFAs for a Full-Price Student Breakfast, by Grade Level and SFA Characteristics, SY 2009–10 to SY 2013–14 (Elementary, Middle, High).....	146
TABLE 8.5	Average Price Charged by SFAs for a Full-Price Student Breakfast in Other Schools, by SFA Characteristics, SY 2009–10 to SY 2013–14 (Other Schools) .....	147
TABLE 8.6	NSLP and SBP Reimbursement Rates for Free School Meals and Average Prices for Paid Meals, SY 2009–10 to SY 2013–14.....	149
TABLE 8.7	Summary of Price Increases for Full-Price Student Breakfasts and Lunches, SY 2009–10 to SY 2013–14 .....	152
TABLE 8.8	Among SFAs That Reported That They Did Not Meet the Paid Lunch Equity Provision, the Percentage of SFAs That Took Various Pricing and Funding Actions, by SFA Characteristics, SY 2012–13 and SY 2013–14 .....	155

TABLE 8.9	Among SFAs That Used Non-Federal Funds to Mitigate Price Increases, the Percentage That Used Various Sources of Funds, by SFA Characteristics, SY 2013–14 .....	158
TABLE 8.10	Weighted Average Price of All Paid NSLP Lunches, by SFA Characteristics, SY 2013–14	159
TABLE 8.11	Percentage of SFAs That Increased À La Carte Prices Between SY 2012–13 and SY 2013–14, by SFA Characteristics .....	161
TABLE 8.12	Among SFAs That Increased À La Carte Prices, the Percentage of SFAs That Increased Prices and the Modal Increase of Those Prices, by À La Carte Foods, SY 2012–13 and SY 2013–14 .....	162
TABLE 8.13	Revenues/Expenditures Received/Made by SFAs during SY 2012–13, by SFA Characteristics.....	164
TABLE 8.14	Distribution of SFAs by Annual Revenues as a Percentage of Annual Expenditures, SY 2010–11, SY 2011–12, and SY 2012–13 .....	165
TABLE 8.15	Distribution of SFAs by Two-Year Revenues as a Percentage of Two-Year Expenditures, SY 2010–11, SY 2011–12, and SY 2012–13 .....	166
TABLE 8.16	Distribution of SFAs by Daily Food Service Expenditures per Average Daily Attendance (ADA), SY 2010–11, SY 2011–12, and SY 2012–13 .....	167
TABLE 8.17	SFAs’ Daily Food Service Expenditures Per ADA by SFA Characteristics, SY 2010–11, SY 2011–12, and SY 2012–13.....	169
TABLE 8.18	Distribution of SFAs by Daily Food Service Revenue Per ADA, SY 2010–11, SY 2011–12, and SY 2012–13.....	170
TABLE 8.19	SFAs’ Daily Food Service Revenue Per ADA, by SFA Characteristics, SY 2010–11, SY 2011–12, and SY 2012–13.....	171
TABLE 8.20	Percentage of SFAs Operating At or Above the Break-Even Level by SFA Characteristics, SY 2010–11, SY 2011–12, and SY 2012–13 .....	173
TABLE 9.1	State Agency CN Directors’ Use of the Updated Administrative Review Process Among the 47 States That Adopted the Updated Administrative Review Process, SY 2013–14	180
TABLE 9.2	Distribution of Targeted Menu Review Options Among the 47 State Agencies That Adopted the Updated Administrative Review Process, SY 2013–14.....	181
TABLE 9.3	Number of SFA Reviews Performed by State Agency Certifying Free and Reduced-Price Students, by Sampling Strategy, SY 2013–14 .....	182
TABLE 9.4	State Agency CN Directors’ Evaluation of the Updated Administrative Review Process Compared to Previous Processes, SY 2013–14.....	183
TABLE 9.5	Recommendations on How to Change or Improve the Updated AR Process .....	183
TABLE 9.6	Year That State Agencies Implemented a Standardized, Computer-Based Reporting System, SY 2013–14.....	186
TABLE 9.7	Percentage of State Agencies with CN Programs Linked to Their Standardized, Computer-Based Reporting System, by Program, SY 2013–14 .....	186

TABLE 9.8	Percentage of State Agencies’ Standardized, Computer-Based Reporting Systems That Perform Various Functions, by Function, SY 2013–14.....	187
TABLE 9.9	Percentage of State Agencies With Site-Level Information Contained in Their Standardized, Computer-Based Reporting Systems, by Type of Information, SY 2013–14 .....	188
TABLE 9.10	Percentage of State Agencies That Link Their Standardized, Computer-Based Reporting Systems to SFAs and Schools, by Type of Method Used for Linking, SY 2013–14.....	189
TABLE 9.11	Percentage of State Agencies That Reported the Ways That They Developed and Managed Their Standardized, Computer-Based Reporting Systems, by Type of Staff, SY 2013–14 .....	189
TABLE 9.12	Percentage of State Agencies That Reported Funding Sources Used to Develop and Maintain Their Standardized, Computer-Based Reporting Systems, by Funding Source, SY 2013–14 .....	190
TABLE 9.13	State Agency CN Director’s Satisfaction With State’s Standardized, Computer-Based Reporting System and With the Computer-Based Link With USDA’s FPRS, SY 2013–14	191
TABLE 9.14	Methods Used to Generate FPRS Reports, SY 2013–14 .....	192
TABLE 9.15	Number of State Agencies Reporting Challenges and Actions That Affected Their Full Use of All Federal Funds, SY 2012–13 and SY 2013–14 .....	196
TABLE 9.16	Reasons CN Directors Did Not Request Reallocation of State Administrative Expense Funds in SY 2012–13 .....	197
TABLE 9.17	CN Directors’ Use of SAE Funds to Improve USDA Food Programs, SY 2013–14 .....	198
TABLE 9.18	Percentage of State Agencies That Provided a Subsidy to SFAs for Breakfast or Lunch, SY 2011–12, SY 2012–13, and SY 2013–14.....	199
TABLE 9.19	Percentage of State Agencies That Provided Different Types of Subsidies and Support for School Lunch and Breakfast, SY 2011–12, SY 2012–13, and SY 2013–14.....	200
TABLE 9.20	Percentage of State Agencies That Provided Different Types of Subsidies and Support for Food Service Operations, SY 2011–12, SY 2012–13, and SY 2013–14.....	201
TABLE 9.21	Percentage of States With Unobligated Funds.....	203
TABLE 9.22	Number of State Agencies Reporting on the Use of Contracted Staff, by Functional Use, for SY 2011–12, SY 2012–13, and SY 2013–14.....	204

# List of Figures

FIGURE 1.1	Percent of SFAs Participating in Child Nutrition Programs in SY 2011–12, SY 2012–13, and SY 2013–14.....	3
FIGURE 1.2	Percent of SFAs Operating Under Special Assistance Alternatives in SY 2011-12, SY 2012-13, and SY 2013-14 .....	5
FIGURE 1.3	Percentage of Charter Schools in SY 2012–13 and SY 2013–14 Participating in the NSLP and the SBP.....	6
FIGURE 1.4	Percentage of SFAs Implementing Updated School Meal Practices, Reporting Challenges, and Observing More Plate Waste as a Result of the Updated Meal Requirements, SY 2013–14 .....	7
FIGURE 1.5	Percentage of SFAs Implementing at Least One Smarter Lunchrooms Strategy in All, Some, or None of Their Schools, by Strategy Goal.....	8
FIGURE 1.6	Percentage of SFAs With Schools That Participated in Farm to School Activities, SY 2012–13 and SY 2013–14.....	10
FIGURE 1.7	Average Price Charged by SFAs for a Full-Price Student Lunch, by School Type (SY 2009–10 To SY 2013–14) .....	11
FIGURE 1.8	Average Price Charged By SFAs for a Full-Price Student Breakfast, by School Type (SY 2009–10 to SY 2013–14) .....	12
FIGURE 5.1	Level of Challenge SFAs (Percent) Report in Implementing the Updated Meal Requirements, SY 2013–14.....	68
FIGURE 5.2	Comparing Level of Challenge SFAs (Percent) Report in Implementing the Updated Meal Patterns, SY 2012–13 and SY 2013–14 .....	70
FIGURE 5.3	Percentage of SFAs Indicating Challenges Encountered in Meeting the Updated Breakfast Standards, SY 2013–14 .....	72
FIGURE 5.4	Level of Challenge Faced by SFAs in Meeting the 50 Percent Whole Grain-Rich Requirements for Breakfast or Lunch Since Implementing the Updated Meal Patterns, SY 2013–14 .....	73
FIGURE 5.5	Challenges Anticipated by SFAs in Meeting the 100 Percent Whole Grain-Rich Requirements for Breakfast and Lunch in SY 2014–15.....	75
FIGURE 5.6	Biggest Challenge Indicated by SFAs in Meeting the Calorie Requirements for Breakfast by Grade Level, SY 2013–14.....	83
FIGURE 5.7	Biggest Challenge Indicated by SFAs in Meeting the Calorie Requirements for Lunch by Grade Level, SY 2013–14.....	84
FIGURE 5.8	Practices SFAs Anticipate Using to Reduce Sodium Levels, by SFA Characteristics, SY 2013–14 .....	89

FIGURE 5.9	Among SFAs That Reported Changes in Plate Waste, the Percentage of SFAs That Reported Various Reasons for the Plate Waste, SY 2013–14.....	93
FIGURE 6.1	Types of Training in Smarter Lunchrooms Strategies Among SFAs With Staff Who Have Received Self-Led Training.....	97
FIGURE 6.2	Percentage of Schools Using at Least One Smarter Lunchrooms Strategy in SY 2012–13 and SY 2013–14, as Reported by SFA .....	98
FIGURE 6.3	Percentage of SFAs Implementing at Least One Smarter Lunchrooms Strategy in All, Some, or None of Their Schools, by Strategy Category .....	99
FIGURE 6.4	Percentage of SFAs With All or Some of Their Schools Using Smarter Lunchrooms Strategies in Two or More Categories .....	100
FIGURE 6.5	Top Five Smarter Lunchrooms Strategies Used By SFAs.....	102
FIGURE 7.1	Percentage of SFAs Using Food Service Management Companies and Cooperative Purchasing Agreements to Manage the Procurement of USDA Foods and Commercial Products, SY 2013–14 .....	109
FIGURE 7.2	Percentage of States That Review SFA Cooperative Purchasing Agreements, GPO Contracts, and FSMC Contracts, SY 2013–14.....	114
FIGURE 7.3	State Requirements Related to Use of Prototype Contracts or Agreements for Food Service Management Companies, Group Purchasing Organizations, and Purchasing Cooperatives, SY 2013–14 .....	116
FIGURE 7.4	Percentage of SFAs With Schools That Participated in Farm to School Activities, SY 2012–13 and SY 2013–14.....	121
FIGURE 7.5	The Top Five Food Items SFAs Purchased Locally, Based on Dollar Value, SY 2012–13.	123
FIGURE 7.6	Percentage of SFAs Using Various Locations to Serve Food to Students, SY 2013–14...	127
FIGURE 8.1	Average Price Charged by SFAs for a Full-Price Student Lunch, by School Type (SY 2009–10 to SY 2013–14) .....	140
FIGURE 8.2	Average Price Charged by SFAs for a Full-Price Student Breakfast, by School Type (SY 2009–10 to SY 2013–14) .....	141
FIGURE 8.3	Percent Change in Breakfast Prices, Lunch Prices, and the Consumer Price Index, SY 2009–10 to SY 2013–14 .....	150
FIGURE 8.4	Reimbursement Rates for Free/Paid Lunches, Weighted Average Price, and Average Paid Lunch Price, SY 2011–12 to SY 2013–14 .....	151
FIGURE 9.1	Adequacy of Current Staffing for Monitoring Program Operations, SY 2011–12, SY 2012–13, and SY 2013–14.....	202

# 1 Executive Summary

The Food and Nutrition Service (FNS), a division of the United States Department of Agriculture (USDA), administers 15 Federal nutrition assistance programs that strive to end hunger and reduce obesity by providing children and low-income people access to healthy foods and nutrition information. The Special Nutrition Program Operations Study (SN-OPS) provides information to FNS and other stakeholders about the Child Nutrition (CN) programs offered in schools—primarily, the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). Because schools may also participate in the Summer Food Service Program (SFSP), the Fresh Fruit and Vegetable Program (FFVP), the Special Milk Program, and the Child and Adult Care Food Program (CACFP), SN-OPS also provides some information related to these programs.

SN-OPS has three objectives:

1. To provide general descriptive data on CN program characteristics in order to inform budget and policy processes, to answer commonly asked questions about topics of interest to policy makers, and to help FNS respond to specific questions about the CN programs in schools;
2. To provide data related to program administration for designing and revising program regulations, managing resources, and reporting requirements; and
3. To provide data to inform FNS about the program operations that could be improved with training and technical assistance developed for the School Food Authorities (SFAs) and State Agencies (SAs) that are responsible for operating the CN programs.

To achieve these objectives, SN-OPS collected data from SFA directors and State CN directors using two data collection instruments: the SFA Director Survey and the CN Director Survey. SFA directors implement the CN programs in participating schools, while CN directors provide administrative oversight, training, and technical support to SFAs, as well as work directly with their FNS Regional Office to ensure proper implementation of the CN programs. A sample of approximately 1,900 (out of approximately 15,100) SFAs was selected in a way that allows summary measures (such as an average or a percentage) calculated from the sample to accurately estimate those same summary measures for the population of all of the SFAs that serve public schools.

Within the 50 States, the District of Columbia, American Samoa, Guam, Puerto Rico, and the U.S. Virgin Islands, there are 55 SAs that administer the Federal CN programs. All 55 participated in the CN Director Survey. This means that summary measures calculated from the responses of the State CN directors are the true national values; i.e., they are not estimates.

SN-OPS included three years of data collection—school year (SY) 2011–12, SY 2012–13, and SY 2013–14, facilitating both cross-sectional (or point-in-time) and longitudinal (or over time) analyses. This document is the Final Report for the third and final year of SN-OPS. Three themes run through the SY 2013–14 report, namely, understanding recent changes in: (1) participation, (2) provision of healthy meals, and (3) administration of CN programs. These themes are not independent. For example, an updated administrative procedure or provisions may increase healthy meals, which may increase participating. Some of the noteworthy findings, organized by theme, are presented below.

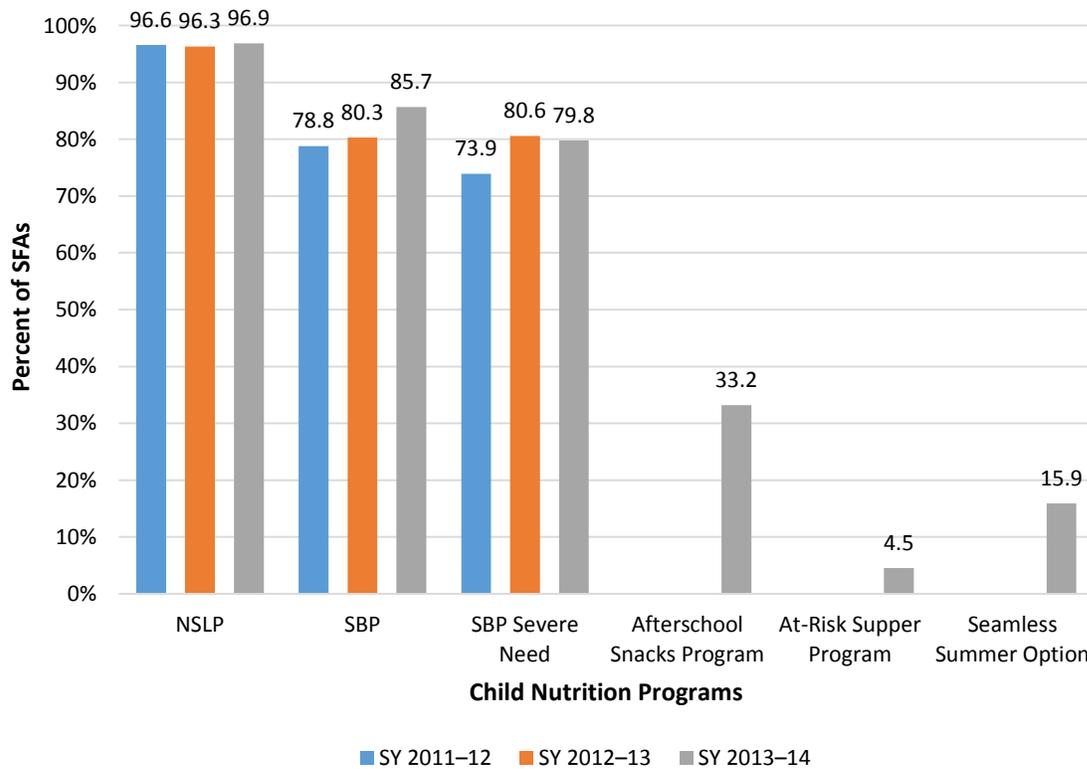
## 1.1 Participation

Understanding participation in the CN Programs is important for two reasons. First, students, especially those who otherwise may not receive adequate nutrition, must participate in the meal service in order to reap the health benefits derived from consuming the nutritious meals and snacks provided through the CN programs. Second, SFAs receive Federal reimbursements based on student participation. If participation falls, SFAs may face financial difficulties in providing nutritious foods to students in need. Third, SFAs working with their school districts must actively decide to participate in CN programs. These decisions are influenced by students' eligibility for free or reduced-price (F/RP) meals and administrative and financial implications of participation. Understanding participation enables FNS and others to assess and develop policies designed to increase participation in CN programs, particularly among those in need.

### 1.1.1 Participation in CN Programs

FIGURE 1.1 shows SFA rates of participation in CN programs. First, although the sample selection criteria for the study only required that SFAs have at least one school participating in the NSLP or the SBP, the vast majority of SFAs (97 percent) reported that all schools in their districts participated in the programs in SY 2011–12, SY 2012–13, and SY 2013–14. Second, participation in the SBP, while still lower than participation in the NSLP, increased over the years. An obvious conclusion from FIGURE 1.1 is that the SBP is “catching up” with the NSLP in terms of participation by all schools. Third, the percentage of SFAs with schools participating in the SBP as severe need schools fell in SY 2013–14. Eligibility for severe need reimbursement is based on the percentage of F/RP lunches served at the school in second preceding school year—this percentage must be at least 40 percent. The dip in participation seen in FIGURE 1.1 may reflect an improving economy as well as the notion that the schools with the most need had already begun participating in the severe need program. Given that participation in the SBP continued to increase in SY 2013–14 and participation in the severe need program decreased, it is likely that new SBP participating schools did not qualify for severe need. Fourth, participation of schools in the Afterschool Snack Program, the At-Risk Supper Program, and the Seamless Summer Option was not measured during the first two years of SN-OPS. The values presented in FIGURE 1.1 provide benchmarks for future studies.

FIGURE 1.1 *Percent of SFAs Participating in Child Nutrition Programs in SY 2011–12, SY 2012–13, and SY 2013–14*



**Note:** SFAs that participate in SBP Severe Need also participated in the SBP.

**Source:** SFA Director Survey SY 2011–12, questions 2.1 and 2.2; SFA Director Survey SY 2012–13, questions 1.1 and 1.3; SFA Director Survey SY 2013–14, questions 1.1, 1.2a, 1.2c, 1.2b, and 1.2d.

### 1.1.2 Participation in the Special Assistance Alternatives

Within the CN programs, there are Special Assistance Alternatives that ease the administrative burden on SFAs and families participating in the NSLP and the SBP. Under Provision 1, schools in which 80 percent or more of enrolled students are eligible for F/RP meals can use approved free meal applications for two consecutive school years, eliminating one year of the application process. In the second year, households that do not have an approved free meal application on file from the prior school year must be given an application and be allowed to apply for meal benefits. There is no requirement to serve meals free of charge to all students. Schools must continue to record the number of free, reduced-price, and paid meals served daily as the basis for calculating reimbursement claims. This provision has been available to school districts since 1980.

Provision 2 allows schools to determine claiming percentages and to serve all school meals at no charge for a four-year period, eliminating three years of certification procedures. During the first year of the four-year period, or the base year, the school makes eligibility determinations and takes meal counts by type; the following three years, the school makes no new eligibility determinations and counts only the

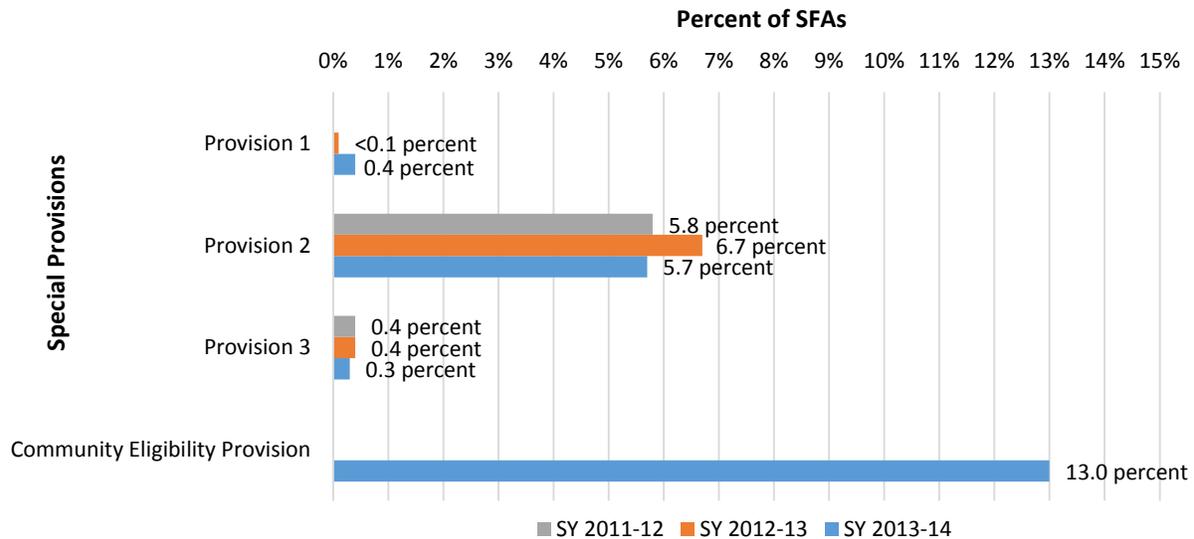
reimbursable meals served each day. Reimbursement during these years is determined by applying the percentages of free, reduced-price, and paid meals served during the corresponding month of the base year to the total meal count for the claiming month. Expenses that are not covered by Provision 2 Federal funds must be paid using non-Federal sources. This provision has also been available to school districts since 1980.

Under Provision 3, schools collect eligibility determinations and meal counts by type in a base year, which determine the amount of Federal cash and commodity support to be received over the next four years. Once a school is approved to receive Provision 3 funding, schools must serve all meals free of charge to all participating children for up to four subsequent years, eliminating four years of eligibility determinations and meal counting. Reimbursements during the four years are based on the total dollar reimbursements that a school received during the base year and are adjusted to reflect inflation and changes in enrollment. This provision has been available to school districts since 1995.

The Community Eligibility Provision (CEP) is a provision from the Healthy, Hunger-Free Kids Act of 2010 that allows schools and SFAs with high poverty rates to provide free breakfast and lunch to all students. CEP eliminates the burden of collecting household applications to determine eligibility for school meals, relying instead on information from other means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservations (FDPIR), and Temporary Assistance for Needy Families (TANF), as well as participation in certain programs that serve homeless, runaway, and migrant children. Schools eligible to participate in CEP must have an identified student percentage (ISP) of at least 40 percent where “identified students” are students certified for free meals through means other than an individual household application, primarily from participation in the programs noted above. CEP schools can use their claiming percentages for up to four years, updating them sooner if the ISP increases. The CEP was phased in over a period of four years, beginning in SY 2011–12. In SY 2013–14, 11 States were authorized to implement CEP. In SY 2014–15, CEP was available nationwide to those schools that meet the eligibility criteria.

FIGURE 1.2 shows the percentage of SFAs that participated in the Special Assistance Alternatives during SY 2011–12, SY 2012–13, and SY 2013–14. From SY 2011–12 to SY 2013–14, SFAs operating under Provision 2 and Provision 3 decreased, while SFAs operating under Provision 1 increased slightly between SY 2012–13 (<0.1 percent) and SY 2013–14 (0.4 percent). Within the 11 States that CEP was operating in SY 2013–14, participation in the provision was relatively high (13 percent). Of the older provisions, Provision 2 was most prevalent (7 percent), whereas Provisions 1 and 3 were rarely used by SFAs.

FIGURE 1.2 *Percent of SFAs Operating Under Special Assistance Alternatives in SY 2011-12, SY 2012-13, and SY 2013-14*



**Note:** Percentage of SFAs operating under CEP is based on the total number of SFAs in the 11 States participating in CEP during 2013–14.

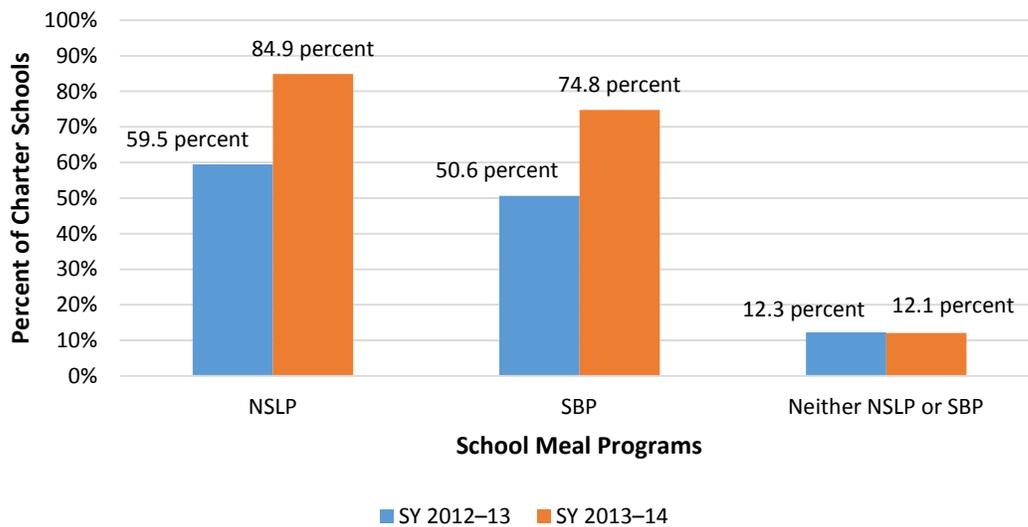
**Source:** State CN Director Survey SY 2011–12, questions D1 and D2; State CN Director Survey SY 2012–13, questions C1 and C2; State CN Director Survey SY 2013–14, questions C1 and C2.

### 1.1.3 Participation of Charter Schools in the NSLP and the SBP

Charter schools operate independently from the school districts in which they are located and are exempt from many State and local rules that govern other public schools. Charter schools may elect not to participate in the NSLP and/or the SBP, even if State law requires that all public schools participate in the programs. This raises concerns that low-income students attending charter schools may not have access to nutritious F/RP meals.

FIGURE 1.3 shows an increasing participation rate in the NSLP and the SBP by charter schools from SY 2012–13 to SY 2013–14. The percentage of charter schools not participating in either program decreased by 0.2 percent between SY 2012–13 and SY 2013–14. By SY 2013–14, more than 80 percent and 70 percent of charter schools were participating in the NSLP and the SBP, respectively.

FIGURE 1.3 *Percentage of Charter Schools in SY 2012–13 and SY 2013–14 Participating in the NSLP and the SBP*



**Source:** CN Director Survey SY 2012–13, questions C4, C4a, C4b, and C4c; CN Director Survey, SY 2013–14, questions C3, C3a-C3c.

## 1.2 Healthy Meals

### 1.2.1 Updated Meal Patterns

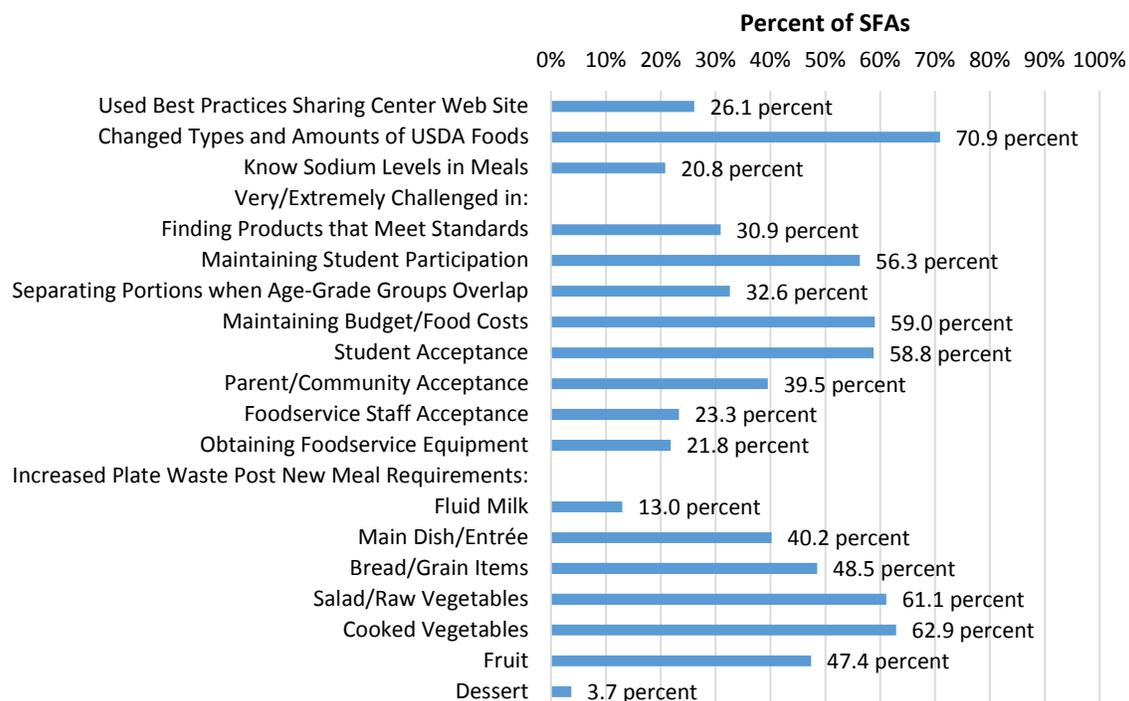
The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 reauthorized the NSLP and the SBP with a focus on improving children’s access to healthy foods and promoting healthy eating and physical activity across the entire school environment. The HHFKA directed USDA to reform nutrition requirements for school meals to ensure that the meals children receive at school are consistent with the latest *Dietary Guidelines for Americans*.<sup>1</sup> Regulations to implement the updated nutrition standards became effective in SY 2012-2013.

FIGURE 1.4 illustrates several findings from SN-OPS, SY 2013–14 from SFAs regarding issues related to the updated meal patterns. First, less than 30 percent of SFAs are using the Best Practices Sharing Center Web site, suggesting either lack of knowledge of its existence and/or lack of perceived usefulness. On the other hand, more than 70 percent of SFAs changed the types and quantities of USDA Foods to help achieve the updated standards. Interestingly, just 30 percent of SFAs reported knowing the sodium content of their meals. SFAs were asked the level of challenge faced in planning meals to meet the updated requirements, while maintaining acceptance of these meals by students, parents, and staff. As

<sup>1</sup> USDA and the U.S. Department of Health and Human Services (HHS). 2016. “Dietary Guidelines.” Last modified January 29. <http://health.gov/dietaryguidelines>.

seen in FIGURE 1.4, over 50 percent of SFAs reported “very” or “extreme” levels of challenge in maintaining student participation, maintaining budget/food costs, and gaining student acceptance. SFAs were also asked about their observations on the amount of food students waste or throw away. In particular, they were asked to compare the amount of waste before and after implementation of the updated standards with the question, “Have you noticed any changes in the amount of food students waste or throw away at lunchtime?” As seen in FIGURE 1.4, over 60 percent of SFAs observed more waste in terms of salad/raw vegetables and cooked vegetables.<sup>2</sup>

FIGURE 1.4 *Percentage of SFAs Implementing Updated School Meal Practices, Reporting Challenges, and Observing More Plate Waste as a Result of the Updated Meal Requirements, SY 2013–14*



Source: SFA Director Survey SY 2013–14, questions 5.1, 5.2, 5.15, 5.21, and 5.22.

### 1.2.2 Smarter Lunchrooms

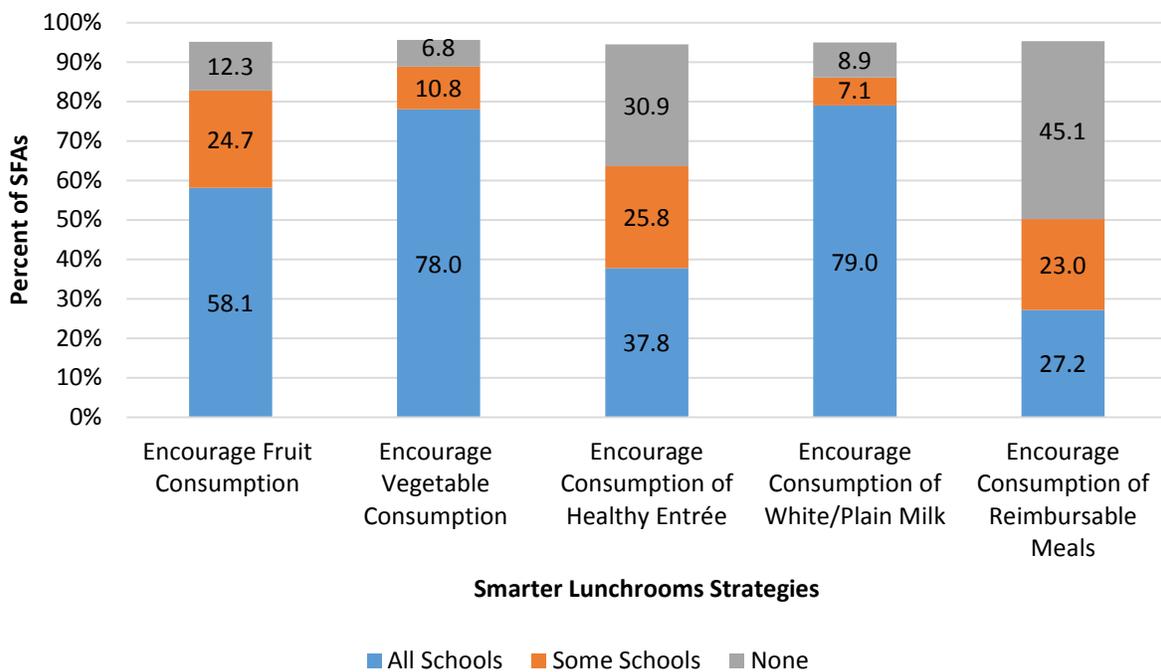
The Smarter Lunchrooms initiative encourages schools to implement low- or no-cost strategies aimed at “nudging” children to make healthier choices when selecting foods for lunch. The Smarter Lunchrooms initiative supports the NSLP in promoting healthy food choices and student participation. SN-OPS, SY 2013–14 collected data on SFAs awareness and application of Smarter Lunchrooms strategies as well as

<sup>2</sup> Plate waste estimates were based on observations and not actually measured or calculated during SY 2013–14.

participation in any related training activities. Approximately 56 percent of all SFAs reported awareness of the Smarter Lunchrooms Movement in SY 2013–14. Among SFAs that knew of the movement, 34 percent reported that staff (the SFA director or other staff) had received training on Smarter Lunchrooms strategies. Both SFAs that were aware of the movement and those that were not reported implementing strategies. This was not surprising, because many of the Smarter Lunchroom strategies are closely aligned with “common sense” and established best practices.

As depicted in FIGURE 1.5, more than 50 percent of SFAs reported that some or all of their schools used at least one strategy in each category (with categories defined by the goals they promote). The least used category was encouraging consumption of the reimbursable meal, while the most used category was encouraging vegetable consumption. Almost 90 percent of SFAs reported that some or all of their schools used strategies from two or more categories. Additionally, more than 50 percent of SFAs reported that some or all of their schools used strategies from three or more categories (data not shown); hence, there is evidence of wide application of these principles in schools.

FIGURE 1.5 *Percentage of SFAs Implementing at Least One Smarter Lunchrooms Strategy in All, Some, or None of Their Schools, by Strategy Goal*



**Note:** SFAs had the option to report that no schools had facilities to implement strategies to encourage reimbursable meals. Additionally, each Smarter Lunchroom strategy had item non-response. Hence, the category bars do not reach 100 percent.

**Source:** SFA Director Survey SY 2013–14, question 10.3.

### 1.2.3 Farm to School Activities

The HHFKA established a Farm to School Program to assist eligible entities, through grants and technical assistance, in the implementation of farm to school programs that increase use of local foods in school

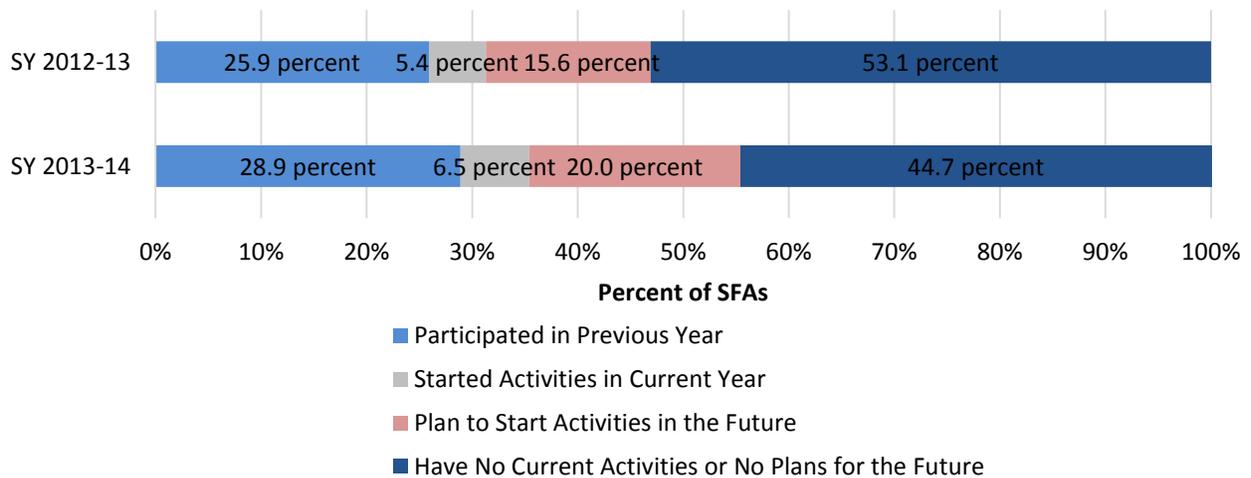
meal programs. To help fulfill the farm to school mandate, the HHFKA provides \$5 million to USDA annually to support training, technical assistance, planning, equipment purchases, development of school gardens, partnership development, and implementation activities.

SN-OPS, SY 2013–14 provided some evidence of increasing momentum for farm to school activities, indicating their potential to complement other initiatives to provide healthy meals through schools. FIGURE 1.6 shows the percentage of SFAs with schools that participated in farm to school activities in the previous year and the percentage that plan to participate in the future. These questions were asked in both SY 2012–13 and SY 2013–14, facilitating the analysis of momentum. In SY 2013–14 the percentage of SFAs that participated increased (26 to 29 percent) and the percentage that planned to start activities in the future increased (16 to 20 percent). Additionally, more SFAs started new farm to school activities in SY 2013–14 than in SY 2012–13. Comparatively, results of the 2013 USDA Farm to School Census found that 39 percent of school districts were engaged in farm to school activities during SY 2011–12 and another 4 percent started farm to school activities during SY 2012–13.<sup>3</sup> The net result is that percentage of SFAs with no activities or plans to add activities fell (53 percent to 45 percent).

---

<sup>3</sup> USDA Food and Nutrition Service (FNS). N.D. "National Overview: Bringing the Farm to School."  
<http://www.fns.usda.gov/farmtoschool/census/>

FIGURE 1.6 *Percentage of SFAs With Schools That Participated in Farm to School Activities, SY 2012–13 and SY 2013–14*



**Note:** The percentage of SFAs that planned to start activities in the future differed significantly between SY 2012–13 and SY 2013–14. The percentage of SFAs that had no current activities or no plans for the future differed significantly between SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2012–13, question 10.1 (asked retrospectively); SFA Director Survey SY 2013–14, question 8.1 (asked retrospectively).

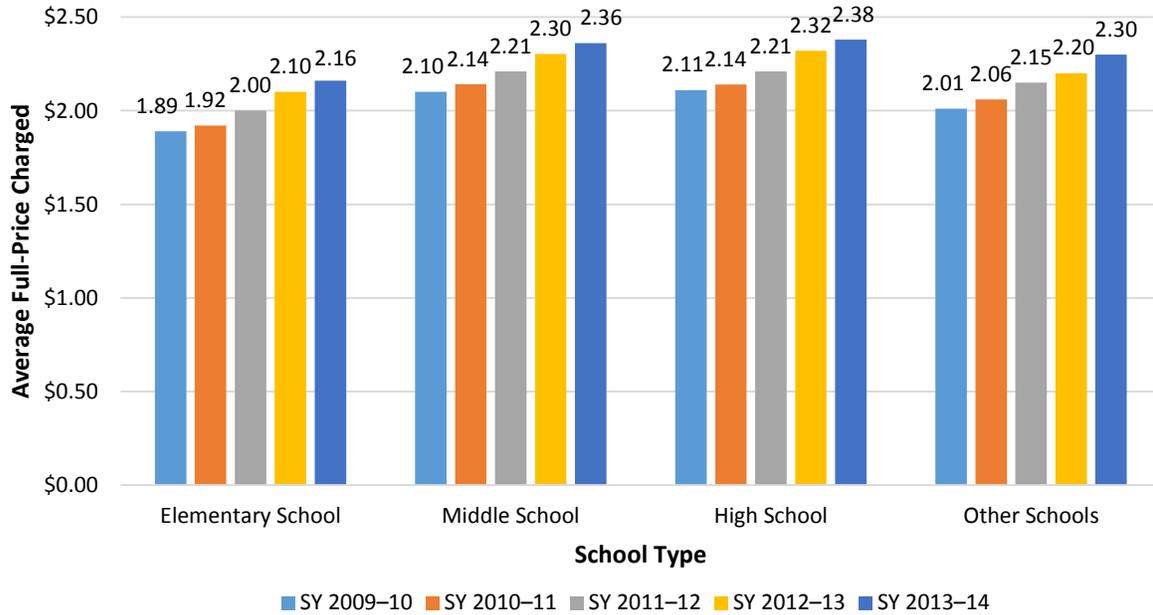
#### 1.2.4 Meal Prices

One factor in providing and accessing healthy meals is their unsubsidized cost. Meal prices affect the financial picture of SFAs (required by law to be nonprofits) and may influence choices made by higher-income students who do not qualify for free or reduced-price meals. Additionally, updated provisions, such as the Paid Lunch Equity Provision, require that SFAs carefully consider meal prices. SN-OPS, SY 2013–14 analyzed several aspects of meal prices

FIGURE 1.7 and FIGURE 1.8 show trends in average prices for full-price lunches and full-price breakfasts by school type,<sup>4</sup> respectively. The average prices of a full paid lunch and a full paid breakfast for all schools (including elementary, middle, high, and other schools) during SY 2013–14 was \$2.30 and \$1.33, respectively (data not shown). From SY 2009–10 through SY 2013–14, prices increased at a rate of 12 to 15 percent, depending on school type. This is somewhat higher than the percentage change in the Consumer Price Index, which equaled 217.7 in September of 2009 and 237.3 in September of 2013, for a percentage increase of approximately nine percent.

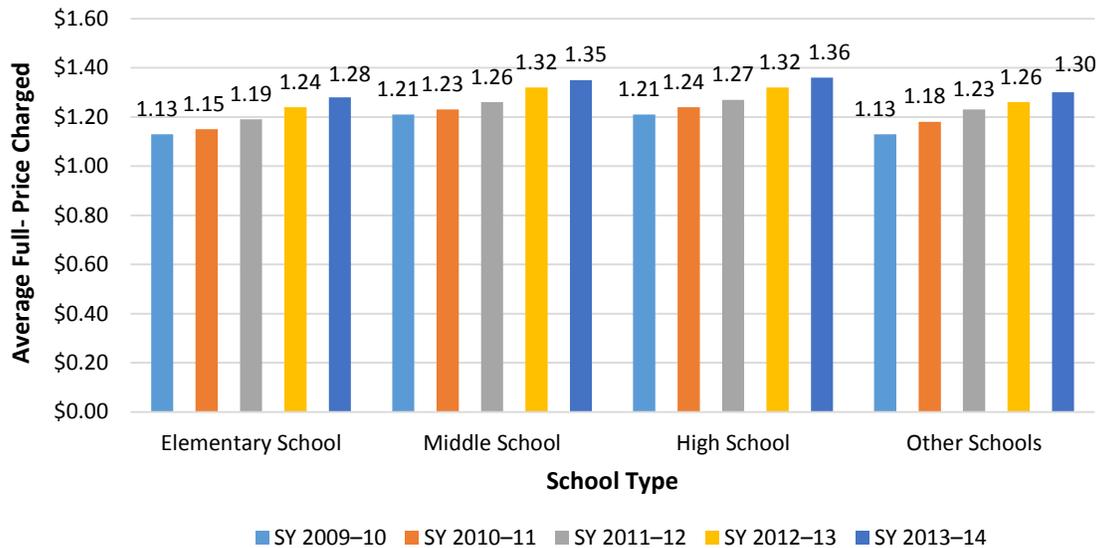
<sup>4</sup> The SN-OPS study defines elementary schools, middle or junior high, and other schools as follows: elementary schools are schools composed of any span of grades from kindergarten through 6th grade; middle or junior high schools are those that have no grade lower than 6 and no grade higher than 9; high schools have no grade lower than 9 and continue through 12th grade; and other schools are any schools that do not meet the elementary, middle or junior high, or high school definition.

FIGURE 1.7 *Average Price Charged by SFAs for a Full-Price Student Lunch, by School Type (SY 2009–10 To SY 2013–14)*



**Source:** SFA Director Survey SY 2011–12, questions 5.4, 5.5a, and 5.5b; SFA Director Survey SY 2012–13, question 6.6; SFA Director Survey SY 2013–14, questions 6.2 and 6.5.

FIGURE 1.8 *Average Price Charged By SFAs for a Full-Price Student Breakfast, by School Type (SY 2009–10 to SY 2013–14)*



**Source:** SFA Director Survey SY 2011–12, questions 5.1, 5.2a, and 5.2b; SFA Director Survey SY 2012–13, question 6.1; SFA Director Survey SY 2013–14, question 6.1.

## 1.3 Administration of the NSLP and the SBP

### 1.3.1 Administrative Review Process

The Administrative Review (AR) is a comprehensive evaluation of school meal programs by SAs of SFAs participating in the NSLP and SBP. The HFFKA required that FNS develop a monitoring process that combines elements of the Coordinated Review Effort and the School Meal Initiative review. Subsequent to HFFKA, the Nutrition Standards in the National School Lunch and School Breakfast Program final rule was issued (January 26, 2012), requiring the review process to be a unified accountability system. The School Meals Administrative Review Reinvention Team (SMARRT), a 26-member team of FNS, Regional Office, and SA staff, developed a unified monitoring process that included key aspects of the Coordinated Review Effort and the School Meals Initiative reviews. Starting on July 1, 2013, SAs could replace the Coordinated Review Effort and the School Meals Initiative reviews with this updated AR process. Forty-seven States adopted the updated AR process for SY 2013–14.

SN-OPS, SY 2013–14 collected information from State CN directors on the use of specific features of the updated AR, including Targeted Menu Reviews (Options 1, 2, 3, and 4), Nutrient Analyses (Options 1, 2, and 3), Resource Management Comprehensive Review (RMCR; including those resulting from a high risk finding from the Resource Management Risk Indicator Tool), Abbreviated Special Provision Option

(SPO), and On-site Reviews of Afterschool Snack Program. When the SAs rated the updated AR overall, as shown in TABLE 1.1, State CN directors generally reported that the updated AR took longer but universally provided more or a similar level of accuracy in each area probed by the survey.

TABLE 1.1 *State Agency CN Directors' Evaluation of the Updated Administrative Review Process Compared to Previous Processes, SY 2013–14*

Process	Percentage of State Agencies				
	Much More	Somewhat More	About the Same	Somewhat Less	Much Less
Time to Complete a Review	70.2	17.0	8.5	2.1	0.0
Time to Complete the Review of the Meal Pattern and Nutritional Quality of Menus	46.8	23.4	8.5	19.2	0.0
<b>Accuracy in the following review areas:</b>					
Meal Access and Reimbursement	10.6	19.2	55.3	8.5	4.3
Meal Pattern and Nutritional Quality	12.8	36.2	38.3	10.6	0.0
Resource Management	46.8	27.7	17.0	0.0	6.4
General Program Compliance	8.5	23.4	55.3	6.4	4.3
Other Federal Program Reviews	27.7	23.4	42.6	2.1	2.1

**Note:** Based on the responses of the 47 States that adopted the updated administrative review process for SY 2013–14.

**Source:** State CN Director Survey, SY 2013–14, question A17.

As part of a continuous effort by FNS to increase participation and provide healthy meals to school children, SN-OPS reports contribute first by serving as reference books of key descriptive information on CN programs from SY 2011–12 through SY 2013–14, and second by highlighting trends that indicate how CN programs are adapting to major regulatory changes. For this, the last report in the SN-OPS series, the information is presented in seven major sections, starting after a brief overview of the study.

## 2 Overview of the Special Nutrition Program Operations Study

The Food and Nutrition Service (FNS), a division of the United States Department of Agriculture (USDA), administers 15 Federal nutrition assistance programs that strive to end hunger and reduce obesity by providing children and low-income people access to healthy foods and nutrition information. FNS works in partnership with the States in all its programs. States determine most administrative details regarding the distribution of food benefits and eligibility of participants, and FNS provides meal reimbursements and funding to cover most of the States' administrative costs. The Special Nutrition Program Operations Study (SN-OPS) provides information to FNS on its programs that operate through schools; hence, its focus is the Child Nutrition (CN) programs—primarily, the National School Lunch Program (NSLP) and the School Breakfast Program (SBP). Because schools may also participate in the Summer Food Service Program (SFSP), the Fresh Fruit and Vegetable Program (FFVP), the Special Milk Program, and the Child and Adult Care Food Program (CACFP), SN-OPS also provides some information related to these programs.

SN-OPS has three main objectives:

1. To provide general descriptive data on CN program characteristics in order to inform budget and policy processes, to answer commonly asked questions about topics of interest to policy makers, and to help FNS respond to specific questions about the CN programs in schools;
2. To provide data related to program administration for designing and revising program regulations, managing resources, and reporting requirements; and
3. To provide data to inform FNS about the program operations that could be improved with training and technical assistance developed for the **School Food Authorities (SFAs)** and **State Agencies (SAs)** that are responsible for operating the CN programs.<sup>5</sup>

To achieve these objectives, SN-OPS collected data from SFA Directors and State CN Directors using two data collection instruments: the SFA Director Survey and the State CN Director Survey. There are approximately 15,000 SFAs representing nearly 100,000 public schools that participate in the Federal CN programs. A **sample** of approximately 1,900 of these SFAs was selected in a way that allows summary measures (such as an average or a percentage) calculated from the sample to accurately estimate those same summary measures for all of the public SFAs participating in the NSLP. No SFAs that work exclusively with private schools were included in the sample. In most cases, SFAs are associated with just one school district, also called a Local Education Agency (LEA), making it appropriate to think of the SFA

---

<sup>5</sup> SFAs are defined by Title 7 (Agriculture), Subtitle B, Chapter II, Subchapter B, Part 250.3 (Definitions) of the Code of Federal Regulations (CFR) as “the governing body which is responsible for the administration of one or more schools and which has the legal authority to operate a nonprofit school foodservice therein or otherwise approved by FNS to operate the NSLP.” Most—but not all—SFAs operate within a single LEA, but the two entities are technically separate administrative units. For further information on SFAs, see 7 CFR § 250.3. <http://www.gpo.gov/fdsys/pkg/CFR-2011-title7-vol4/pdf/CFR-2011-title7-vol4-sec250-3.pdf>.

Director as working for that LEA to implement FNS' CN programs.<sup>6</sup> In a few cases, one SFA may work for two or more LEAs. Because of these cases, it is not correct to conclude that the estimates presented in SN-OPS accurately represent the public LEAs that participate in the Federal CN programs. Therefore, SN-OPS provides national **estimates** of SFA characteristics, program participation, operations, resources, and practices.

Within the 50 States, the District of Columbia, American Samoa, Guam, Puerto Rico, and the U.S. Virgin Islands, there are 55 SAs that administer the Federal CN programs. All 55 participated in the State CN Director Survey. This means that summary measures calculated from the responses of the State CN Directors are the true national values; i.e., they are not estimates.

SN-OPS includes three years of data collection—school year (SY) 2011–12, SY 2012–13, and SY 2013–14. Both the SFA Director Survey and the State CN Director Survey were designed in a modular fashion: they contain some common modules across the years as well as some unique models in a particular year or set of years. TABLE 2.1 and TABLE 2.2 present the modules by year for the SFA Director Survey and State CN Director Survey, respectively. As shown, many modules were preserved across all years, while some are unique to just one or two years. Within each common module, many survey questions (also referred to as “items”) are identical, but some modules contain items unique to a particular year. The modular design of the SN-OPS surveys facilitates the collection of data that allow for (1) purely cross-sectional analyses; i.e., the analysis of points-in-time measures, and (2) purely longitudinal analyses; i.e., the analysis of repeated observations of the same measures over time. The intent of cross-sectional data analysis is to provide a “snapshot” for program operations, while the intent of longitudinal analyses is to determine changes in the measures of interest. For example, the SY 2013–14 SFA Director Survey was the only survey year in which data were collected on the use of Smarter Lunchroom strategies (Section 6), making it possible to describe implementation for SY 2013–14. All three years of the SFA Director Survey collected information on meal prices (Section 8), making it possible to describe the changes in prices over time—particularly, between the SN-OPS, SY 2012–13 and SN-OPS, SY 2013–14 surveys, when updated regulations regarding prices took effect.

---

<sup>6</sup> An LEA is defined by the Elementary and Secondary Education Act, signed into law in 1965, as “a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools.” (See: <http://www.ed.gov/race-top/district-competition/definitions>; accessed January 2016.)

TABLE 2.1 *SFA Director Module Overview: SY 2011–12, 2012–13, and 2013–14*

<b>Module</b>	<b>SN-OPS, SY 2011–12</b>	<b>SN-OPS, SY 2012–13</b>	<b>SN-OPS, SY 2013–14</b>
School Participation	X	X	X
Student Participation	X	X	X
Food Service Characteristics and Operations	X	X	X
Cooperative Purchasing			X
Updated Meal Pattern Requirements		X	X
Meal Prices	X	X	X
Revenues	X	X	X
Expenditures	X	X	X
Food Service Equipment		X	
Procurement Issues and Farm to School Activities	X	X	X
Food Safety Program	X		X
Meal Counting, Claiming, And Recouping Unpaid Meals	X		
Training and Technical Assistance		X	
SFA Foodservice Staff Background		X	
Smarter Lunchrooms			X

**Note:** Revenues and Expenditures were combined for SN-OPS, SY 2013–14.

**Source:** SFA Director Survey SY 2011–12; SFA Director Survey SY 2012–13; SFA Director Survey SY 2013–14.

TABLE 2.2 *State CN Director Survey Module Overview: SY 2011–12, 2012–13, and 2013–14*

<b>Module</b>	<b>SN-OPS, SY 2011–12</b>	<b>SN-OPS, SY 2012–13</b>	<b>SN-OPS, SY 2013–14</b>
Policy	X	X	
Resources and Finances	X	X	X
Operational Procedures	X	X	X
Training and Technical Assistance	X	X	
Updated Administrative Review Process			X
State Data Systems			X

**Source:** State CN Director Survey SY 2011–12, State CN Director Survey SY 2012–13, State CN Director Survey SY 2013–14.

This document is the Final Report for the third year of SN-OPS. The cross-sectional analyses concern SY 2013–14, although there are a few instances where a survey item asked for information for a previous school year. It is important to keep in mind that respondents answered the survey questions during SY 2013–14, so all data reflect the knowledge and perspectives of the SFA and State CN directors during this time frame. As the final year of the study, this report capitalizes on the information collected in prior years by expanding the longitudinal analyses.

In summary, SN-OPS provides an analytic description of FNS' Special Nutrition Programs that operate through public schools in the U.S. and its territories. Data include the responses from both the State CN Directors (those who administer the programs) and the SFA Directors (those responsible for providing meals and snacks to children through the public schools).

## 2.1 Topics Covered in SN-OPS in SY 2013–14

TABLE 2.1 and TABLE 2.2 show the topics covered in SY 2013–14. In at TABLE 2.1, note that seven modules in the SY 2013–14 SFA Director Survey had common items from all previous years of data collection: School Participation; Student Participation; Food Service Characteristics and Operations; Updated Meal Pattern Requirements; Meal Price; Revenues; Expenditures; Food Service Equipment; and Procurement Issues and Farm to School Activities. The Updated Meal Pattern Requirements module appeared in SY 2012–13 and SY 2013–14, while the Food Safety Program module appeared in SY 2011–12 and SY 2013–14. The two new modules for SY 2013–14 focused on Cooperative Purchasing and Smarter Lunchroom strategies. Similarly, TABLE 2.2 shows that the SY 2013–14 State CN Director Survey had two modules in common with previous years—Resources and Finances and Operational Procedures—and two new modules, Updated Administrative Review Process and State Data Systems.

The SFA Director Survey included 69 questions organized into 10 modules that varied by year, as noted above, while the State CN Director Survey contained 50 items. The full survey instruments are presented in Appendix A (State CN Director Survey) and Appendix B (SFA Director Survey).

The data from the State CN Director Survey will help FNS understand how recent Federal legislative and policy changes affect CN programs. Because the CN Directors report directly to FNS, but also work closely with SFAs, they are a vital source of information concerning personnel management, financial management, purchasing and contracts, maintenance of quality standards/quantity control, program participation, and Federal and State compliance.

The SFA is responsible for operating CN programs in one or more schools while abiding by both Federal and State regulations. The SFA Director Survey is intended, therefore, to provide local perspectives on a range of topics including implementation of updated rules and policies, use of strategies to interest students in school meals, students' response to new food items, use of foodservice management companies, staff training, local costs and revenues, and challenges in the operation of the CN programs.

### 2.1.1 Major Themes for SN-Ops in SY 2013–14

While the individual topics of the modules in the SY 2013–14 surveys are interesting and important to FNS, there are three major themes that transcend the individual modules. These themes reflect the regulatory, policy, and legislative contexts during SY 2013–14. An important driver of changes in these contexts was the passage of the Healthy, Hunger-Free Kids Act (HHFKA) of 2010.<sup>7</sup> This legislation contains provisions that directly and indirectly affect the operations of the CN programs. In response to the HHFKA, USDA has revised operational procedures, rules, and grant opportunities to comply with the law. While the details of these changes will be discussed throughout this report, in summary, they work

---

<sup>7</sup> The full text of the HHFKA is available at <https://www.govtrack.us/congress/bills/111/s3307/text>.

to increase (1) provision of nutritious meals to children, (2) participation in the CN programs by schools and children, and (3) access to nutrition education and training for school foodservice professionals.

**Healthy Meals.** Childhood obesity and the need to reduce the health risks associated with obesity are national concerns. The HFFKA required USDA to issue regulations to update the meal patterns and nutrition standards for school meals based on the recommendations of the Institute of Medicine (IOM), which is a division of the National Academies of Science, Engineering, and Medicine. The final rule for updating the nutritional standards mandated in the HFFKA was made effective in March 2012 and required schools to begin implementing the standards in July 2012; the final rule not only modified nutritional requirements of school meals but also discussed financial requirements.<sup>8</sup> In response, FNS developed and issued updated rules and funding streams that assist schools in providing healthier meals and snacks by, for example, limiting consumption of *trans* fat and sodium, while increasing the availability of fruits, vegetables, whole grains, and fat-free and low-fat fluid milk. The SN-OPS study (SY 2011–12 through SY 2013–14) provides FNS an overview of the implementation of the updated meal requirements and how participation and acceptance has varied over time.

**Increasing Participation.** Schools offer meals free or at a reduced price (F/RP) to children who qualify, and receive Federal funds through the NSLP and the SBP to cover their expenses. The burdens associated with the application and eligibility determination processes are major barriers to participation by both families and schools. The HFFKA defined a new process, the Community Eligibility Provision (CEP), which allows eligible high-poverty schools to offer free lunches and breakfasts to all students and use claiming percentages that are based on the proportion of their students **directly certified**<sup>9</sup> for free meals, rather than with household applications. CEP is designed to decrease administrative burden and increase access to meals for all students without the risk of stigma. Because CEP was phased in over a four-year period beginning with SY 2011–12, the results from SN-OPS for SY 2013–14 provide an important benchmark prior to the nationwide rollout on July 1, 2014. The rate of implementation of CEP in the rollout States may prove predictive of what to expect as nationwide adoption continues. Other important topics in SN-OPS that help FNS understand and promote participation include changes in rules governing meal prices, and the integration of Federal, State, and local data systems.

**Program Administration and Training.** FNS works with SAs to administer the CN programs. SAs, in turn, work with SFAs to ensure compliance and ease program participation. Traditionally, FNS has provided grant opportunities to SAs who engage SFAs to provide training and technical assistance to school foodservice professionals and to support stronger school nutrition education programs. The HFFKA specified that FNS implement updated professional standards for State and local personnel. The final rule, published on March 2, 2015, specifies professional standards for State CN Directors and, for the

---

<sup>8</sup> USDA. "Nutrition Standards in the National School Lunch and School Breakfast Programs; Final Rule," 77 *Federal Register* 17 (26 January 2012), pp. 4088-4167.) <http://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf>.

<sup>9</sup> Direct certification for school meals comes through participation in other means-tested programs, such as the Temporary Assistance Program for Needy Families (TANF) and the Supplemental Nutrition Assistance Program (SNAP). For additional information, see FNS' Community Eligibility Provision Web page at <http://www.fns.usda.gov/school-meals/community-eligibility-provision>.

first time, local personnel.<sup>10</sup> Thus, the analysis of data from SY 2013–14 in SN-OPS provides a point of reference for assessing potential operational issues and the implementation of the updated professional standards.

## 2.2 Data Collection Procedures

Both the SY 2013–14 State CN Director Survey and the SY 2013–14 SFA Director Survey were administered as Web surveys using Qualtrics, a commercial survey platform that provides a range of services for monitoring data collection and contacting participants.

The State CN Director Survey began June 5, 2014, and was officially closed November 17, 2014; however, surveys were accepted until early January 2015. State CN Directors in all 50 States, the District of Columbia, and four territories (Guam, U.S. Virgin Islands, American Samoa, and Puerto Rico) received an initial email invitation and a link to the Web-based survey. Follow-up procedures, such as tracking of non-respondents, follow-up emails, and telephone reminders were used to increase participation levels. The response rate for the State CN Director Survey was 100 percent.

The SFA Director Survey began on May 2, 2014 and closed on November 17, 2014. The 1,881 participants were notified of the survey by email and provided with login credentials and a direct link to the Qualtrics Web-based survey. The email notification was followed by a FedEx package that included a paper copy of the survey, as well as login information required to complete the survey online. The paper copy was designed for reference purposes only and as an additional prompt to respond online.

Electronic responses were tracked and categorized as: (1) valid response, (2) invalid response, or (3) ineligible. Records were classified as invalid or ineligible if an email indicated discontinuation of school meal program participation, SFA program ineligibility, and “failure to send” messages. Ultimately, all 1,881 distributed surveys were confirmed as received or resolved as non-responsive or ineligible.

During the survey administration timeframe mentioned above, respondents were sent reminders such as emails, phone calls, and regular mail postcards. All but five of the respondents provided their answers via the Qualtrics Web survey. The five hard-copy surveys were entered in the Qualtrics system using the corresponding SFA’s survey account. Multiple points of contact for some SFAs required extensive inquiry to determine the right contact. User error was reduced or quickly corrected by continuously monitoring the progress of the survey.

TABLE 2.3 shows the disposition of the 1,881 SFA Directors in the sample. Although 1,537 SFA Directors completed questions from every section in the survey, not every item was answered in every section; this is referred to as “item nonresponse.” If at least 50 percent of the items in a section were completed, that section was considered complete when coding the 1,537 cases. The second row of TABLE 2.3 shows that 61 SFA Directors completed questions from fewer than all, but more than four sections. Again, in counting these 61, a section was considered complete if at least 50 percent of the items in that section were completed. The total of 1,537 and 61 (1,598) were then considered valid responses, for an overall

---

<sup>10</sup> The Federal Register Notice containing the entirety of the rule is available at <http://www.gpo.gov/fdsys/pkg/FR-2015-03-02/pdf/2015-04234.pdf>.

response rate of 85 percent; remaining cases were classified into one of three categories—incomplete responses, no response, and ineligible. By comparison, the response rates in SY 2011–12 and SY 2012–13 were 79 and 80 percent, respectively.

TABLE 2.3 *Categorization of SFA Sample Responses: SN-OPS, SY 2013–14*

Category	Cases
<b>Valid Responses</b>	
Completed Questions from All Sections	1,537
Completed Questions from Fewer than All, But at Least Five Sections	61
<b>Incomplete Responses</b>	
Four or More Sections Left Blank	64
No Response	207
Ineligible	12
Sample Size	1,881
Response Rate (Valid Responses ÷ Eligible Sample Size)	85.5 percent

Source: SFA Director Survey SY 2013–14.

## 2.3 SFA Sample Selection, Weights, and Adjustments

The design of the SY 2013–14 SFA Director sample employed the designs in the previous two years of SN-OPS.<sup>11</sup> For SY 2011–12, SN-OPS relied on the 2009–10 Verification Summary Report (VSR) data (Form FNS-742) from FNS and the National Center for Educational Statistics (NCES) 2008–09 Common Core of Data (CCD) to create a **sampling frame** for the SFA directors. The sampling frame provided the list of all possible SFA directors who are eligible to be selected for the study. The VSR dataset is collected annually by FNS and contains information including the number of schools and students who are participating in the NSLP and the SBP within an SFA, as well as the number of approved applications for F/RP meals. The CCD dataset contains information about schools, school districts, and administrative units providing education services. This information includes location, type of agency, grade span, number of schools associated with the district or agency, and total number of students by grade and by school. For SY 2011–12, SN-OPS included 1,768 SFAs representing 1,771 LEAs. In SY 2012–13, the sample was expanded to 1,881 by creating a new sampling frame from the 2011–12 VSR dataset and then selecting additional SFAs for participation SN-OPS. Of the 1,881 in SY 2012–13, 1,754 carried over from the original 1,768. As noted above, appearance of the same SFAs across multiple years of SN-OPS is an important feature of the study because it facilitates longitudinal analysis. The SY 2013–14 SFA Director sample was very similar to SY 2012–13, with 1,878 SFAs representing 1,881 LEAs and with 1,873 in common with SY 2012–13.<sup>12</sup>

In each year of SN-OPS, special techniques were used to ensure that the sample of SFAs represents certain groups of SFAs. This is necessary for two reasons. First, the majority of SFAs are relatively small

<sup>11</sup> Please see Appendix C for a more detailed discussion about the sample used for the SFA Director Survey.

<sup>12</sup> Please see Appendix C for a description of the differences in the samples over the three years.

in terms of the number of students enrolled. Second, most students in the U.S. attend larger school districts. Therefore, if the sample was selected with simple random sampling, the sample would contain mostly small SFAs, which would represent the universe of SFAs but not the majority of students participating in the school meal programs. To address this problem, SN-OPS grouped the SFAs into seven size categories (based on number of students) and then selected the sample using different sampling rates within each category. In addition to representing SFAs of different sizes, SN-OPS also represented SFAs in different geographic regions (referred to as FNS Region), urban/rural locations (referred to as urbanicity), and with different percentages of their students qualifying for F/RP meals (referred to as SFA poverty).

TABLE 2.4 provides information on the sampling frame, implied sampling rates, and the sample for the SY 2013–14 SFA Directors sample. The first column shows the main groupings for the SFAs. Note that within the size groups, the largest number of SFAs fall into the smallest category; i.e., of the 15,168 SFAs in the sampling frame, more than 50 percent (7,919) serve fewer than 1,000 students each. On the other hand, 26 SFAs serve more than 100,000 students each. To determine the sampling rate, the SN-OPS researchers used statistical principles to determine the number of SFAs required from each group to ensure that the summary measures computed from the sample data would adequately represent both the national population of SFAs and the population of SFAs within each group. For the smallest group, a sample of size 487 (fourth column, first number) will represent the 7,919 smallest SFAs. In the last column, note that this implies a sampling rate of approximately 6 percent. For the largest size category, the researchers selected all of the SFAs into the sample; hence the sampling rate is one, and these are referred to as “certainty units.” The consequences of this design are apparent when comparing the Percent column under the Sampling Frame tab to the Percent column under the Sample tab. The sample has a different size distribution than the sampling frame; for example, the sample is composed of 25.9 percent small SFAs, but the sampling frame has 52.4 percent. As discussed below, this requires “weighting” the sample units to bring the sample distribution more in line with the sampling frame.

TABLE 2.4 *Distributions of the Sampling Frame and Sample Over Several Characteristics of SFAs: SN-OPS, SY 2013–14 SFA Director Survey*

SFA Characteristics	Sampling Frame		Sample		
	Total	Percent	Total	Percent	Implied Sampling Rate
<b>SFA Size</b>					
<1,000	7,919	52.4	487	25.9	0.06
1,000-2,499	3,357	22.1	387	20.6	0.12
2,500-4,999	1,948	12.7	328	17.4	0.17
5,000-9,999	1,045	6.9	249	13.2	0.24
10,000-24,999	605	4	220	11.7	0.36
25,000-99,999	268	1.8	184	9.8	0.69
100,000+	26	0.2	26	1.4	1.00
<b>Total</b>	<b>15,168</b>	<b>100</b>	<b>1,881</b>	<b>100</b>	
<b>Poverty Level</b>					
Low (0–29 percent F/RP)	3,096	20.2	426	22.7	0.14
Medium (30–59.9 percent F/RP)	6,752	44.6	839	44.6	0.12
High (60 percent or more F/RP)	5,320	35.2	616	32.8	0.12
<b>Total</b>	<b>15,168</b>	<b>100</b>	<b>1,881</b>	<b>100</b>	
<b>FNS Region</b>					
Northeast	1,790	11.6	215	11.4	0.12
Mid-Atlantic	1,516	10.0	202	10.7	0.13
Southeast	1,262	8.3	248	13.2	0.20
Midwest	3,813	25.2	413	22.0	0.11
Southwest	2,256	14.9	272	14.5	0.12
Mountain Plains	2,381	15.7	219	11.6	0.09
Western	2,150	14.2	312	16.6	0.15
<b>Total</b>	<b>15,168</b>	<b>100</b>	<b>1,881</b>	<b>100</b>	

Source: SFA Director Survey SY 2013–14.

To ensure representation in terms of urbanicity and SFA poverty, the SFAs were sorted into these groups *within* each size category before sampling. For example, the 7,919 SFAs in the smallest size category were first grouped by urbanicity and then by poverty (creating 12 subgroups), and were then sampled at the rate of approximately 6 percent. As can be seen in TABLE 2.4 (compare the Percent columns for the Poverty Level categories), this approach works well to preserve the representativeness of the sample.

### Weights

TABLE 2.4 illustrates why the SFA Directors' responses had to be weighted prior to analysis, if the analysis intended to represent SFAs nationally. A response from a small SFA, for example, was used to represent several other small SFAs (487 represent 7,919); hence, it would have a relatively large weight. A response from a very large SFA, on the other hand, only represented itself, making its weight equal to 1. Theoretically, the weight is one divided by the probability of being selected. Thus, for the smallest size category, the weights were approximately  $1/.06 = 16.7$ . However, in SN-OPS, many of the SFAs were selected in SY 2011–12 using the sampling frame from that year, meaning that the samples used in SY

2012–13 and SY 2013–14 *inherited* the weights from SY 2011–12. This added a layer of complexity to the SN-OPS study, because additional SFAs in the following two years were selected from the sampling frame built from 2011–12 VSR data. A decision was made to adjust all of the inherited weights so that the SN-OPS, SY 2012–13 and the SN-OPS, SY 2013–14 samples represented the 2011–12 VSR frame. The adjustment, known as “post-stratification raking,” iteratively changed the weights until the respective samples, when weighted, represented the specific SFA characteristics (size and FNS Region) found in the 2011–12 sample frame.

### *Adjustments for Nonresponse*

If every SFA in the sample responded to the survey, the adjusted weights described above would be accurate for SFA-level analysis of the data. However, when response rates are less than 100 percent, it is necessary to consider the potential for nonresponse bias in the sample and to adjust the weights to compensate for the non-responders. The SY 2013–14 response rate was 85 percent and systematic (predictable) differences in the non-responders were not expected. To verify that systematic nonresponses were not present in the collected survey data, a Chi-Squared Automatic Iteration Detection (CHAID) method was applied. This technique verifies any response differences by comparing whether or not cells, based on SFA characteristics, had significant differences in response rates. No significant cell differences were identified during the CHAID, suggesting no systematic nonresponse bias. However, the weights were “raked” again to ensure appropriate representation of the sample frame. In this round of raking, the weights were iteratively adjusted to represent the 2011–12 VSR frame over SFA size, FNS Region, and poverty level. These were the weights used to analyze the SY 2013–14 SFA Director Survey data.

### *Longitudinal Data and Weights*

Because the design of SN-OPS allowed some of the same respondents to answer questions in three consecutive years, the longitudinal weights could be different than the individual year weights. Since not all SFA Directors responded in all three years, the longitudinal response rates were lower than the response rates for any particular year, making it necessary to create a set of longitudinal weights to analyze the longitudinal measures.

## 2.4 Presentation of Results and Statistical Tests

SN-OPS was designed to collect data from SAs and SFAs that, when summarized, describe participation in and operations of the school meal programs. Most of the summary measures are either percentages (also called proportions or prevalence) or means (also called averages). As a descriptive study, SN-OPS offers only limited possibilities for statistical testing. Statistical tests are relevant when analyzing sample data but not when analyzing a population. Therefore, in presenting summary measures from the State CN Director Survey data, we do not present any statistical tests. The summary measures should be treated as *the* population measure. In contrast, summary measures from the SFA Director Survey data should be treated as estimates of a population measure. Because SN-OPS was designed to provide estimates of percentages and means within +/-2.5 percent of the population measure with 95 percent confidence, we do not present the standard errors or confidence intervals for the summary measures from the SFA Director Survey. One design feature of the study was to enable tests of association over

SFA characteristics. Thus, in tables where the estimates are cross-tabulated by SFA characteristics (size, urbanicity, and poverty), tests are presented for associations between the summary measure and SFA characteristics. Since the level of significance is always 0.05, this is not reported in the tables. Significant associations are reported as footnotes in the table. The design of SN-OPS also facilitates statistical tests of differences over time. Significant differences over time are noted in the corresponding tables along with their level of significance.

As an example of how to read most of the tables in this report, consider TABLE 2.5. Observe that:

- The title clearly identifies that the unit of analysis is the SFA and that the summary measures presented are percentages.
- The first row of tabs indicates that this table contains longitudinal data; hence, if there are statistically significant differences between the years, the table will contain a *letter* footnote to indicate statistical significance. In this example, we see that the SY 2013–14 percentage is statistically different (less) than the SY 2012–13 value.
- The second set of row tabs denotes the SFA characteristics, the percent (the measure of interest in this table), and weighted and unweighted numbers of observations. It is important to consider the number of observations, because they reveal the number of SFAs that responded to the question (unweighted *n*) and the total number of SFAs that these responses represent (weighted *n*). Numerical footnotes in the unweighted *n* tab identify the potential size for the sample, given item nonresponse.
- The first column indicates the groups over which the summary measures are tabulated. In this example, there are four groups (SFA Characteristics)—All, Size, Urbanicity, and Poverty Level. The “All SFAs” row contains the national estimate of the measure—in this case, the percentage of SFAs that changed the types and amounts of USDA foods in order to meet updated meal requirements. The following rows provide the national estimates for the particular subgroup. In every table with SFA characteristics, a Chi-Square test of association is performed to determine if the estimates vary significantly by the characteristic. If significant differences are detected, a *numerical* footnote will appear with the SFA characteristic group. In TABLE 2.5, footnote “3” indicates that the percentage varied significantly by urbanicity in both years. A quick look at the estimates confirms that the SFAs in towns and rural areas changed the types and amounts at a higher rate than those located in city and suburban areas.

TABLE 2.5 *Percentage of SFAs That Changed the Types and Amounts of USDA Foods in Order to Meet Updated Meal Requirements, by SFA Characteristics, SY 2012–13 and SY 2013–14 (Example)*

SFA Characteristics	SY 2012–13			SY 2013–14		
	Percent	Total SFAs		Percent	Total SFAs	
		Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>		Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>2</sup>
All SFAs	73.5	13,449	1,378	<sup>a</sup> 70.9	14,677	1,567
<b>SFA Size</b>						
Small (1–999)	71.9	6,565	315	69.1	7,521	365
Medium (1,000–4,999)	75.8	4,885	513	73.1	5,224	599
Large (5,000–24,999)	73.6	1,690	373	74.0	1,641	411
Very Large (25,000+)	70.0	309	177	61.3	291	192
<b>Urbanicity<sup>3</sup></b>						
City	61.5	1,649	266	60.2	1,334	265
Suburban	68.9	2,568	363	69.3	2,700	427
Town	75.0	2,599	261	74.0	2,615	284
Rural	77.6	1,634	488	74.2	7,014	532
<b>Poverty Level</b>						
Low (0–29 percent F/RP)	72.8	2,677	293	71.4	3,016	351
Medium (30–59 percent F/RP)	74.6	6,168	621	73.6	6,765	717
High (60 percent or more F/RP)	72.2	4,603	464	66.9	4,896	499

<sup>1</sup> *n* is less than 1,491 due to item nonresponse.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

<sup>3</sup> Percentage of SFAs that changed the types and amounts of USDA foods in order to meet updated nutrient requirements and meal patterns differed significantly by urbanicity in SY 2012–13 and SY 2013–14.

<sup>a</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Directors Survey SY 2012–13, question 5.43; SFA Directors Survey SY 2013–14, question 5.21.

## 2.5 Limitations of the Study

This volume presents findings from surveys of State CN and SFA directors. While the surveys were designed to elicit accurate responses, error is still possible. Respondents may unknowingly report incorrect information, inadvertently check the wrong response, or intentionally skip a particular question. Ideally, the consequences of such mistakes are minimal (they “average out”), but there is no way to quantify their magnitude.

Several tabulations suggest causal relationships. As a descriptive study, causality cannot be established with SN-OPS data. Instead, the tabulations can be used to provide anecdotal information about hypothesized causal relationships and facts for formulating new hypotheses. FNS conducts many targeted studies to assess causal impacts, and the findings from SN-OPS provide real-world context for those studies.

## 3 Participation in the NSLP, the SBP, and Other Child Nutrition Programs

Understanding participation in the CN Programs is important for two reasons. First, students, especially those who otherwise may not get adequate nutrition, must participate in order to reap the health benefits derived from consuming the nutritious meals and snacks provided through the CN programs. Second, SFAs receive Federal reimbursements based on student participation. If participation falls, SFAs may face financial difficulties in providing nutritious foods to students in need. It is critical to compile and interpret data on participation on a regular basis to identify emerging trends and assess how SFAs, students, and families respond to operational changes.

This section presents estimates of SFA, school, and student participation in the NSLP and the SBP over the course of SY 2011–12, SY 2012–13, and SY 2013–14. It also examines participation in other CN programs, including the NSLP Afterschool Snack Program, the CACFP At-Risk Supper Program, and the NSLP Seamless Summer Option. This is an especially interesting time to consider participation. At the macro level, the U.S. economy has slowly emerged from the Great Recession, potentially reducing the need for means-tested Federal programmatic benefits. On the other hand, the HHFKA resulted in updated rules and programmatic changes that produce opposing forces on participation; some may tend to increase participation, while others may tend to decrease it. Beyond these specific events, FNS has a continual influence on participation in CN programs through iterative improvements in policies and procedures, support for training and technical assistance, and general operational systems. As a national descriptive study, SN-OPS is not designed to untangle the nuances of the specific causes for observed changes in participation. Instead, SN-OPS provides the descriptive facts necessary to assess overall trends in participation and establish aggregate baselines for future years and more specific studies of particular issues.

### 3.1 Background

#### 3.1.1 The NSLP and the SBP

Congress enacted the National School Lunch Act in 1946 to ensure that American children received adequate and nutritionally balanced meals, through guaranteed Federal subsidies given to schools for school meals, including free or reduced-price meals for children from low-income families.<sup>13</sup> During 2013–14, the NSLP and the SBP were the largest CN programs. Data from Fiscal Year (FY) 2014 indicate that funding for the NSLP and the SBP was approximately \$12.2 billion and \$3.5 billion in FY 2013, respectively.<sup>14</sup> During FY 2013, there were 99,953 schools and residential child care institutions (RCCIs) that participated in the NSLP, feeding 30.7 million students, and 90,000 schools and RCCIs participated

---

<sup>13</sup> Gunderson, Gordon. 2014. "National School Lunch Program: Background and Development." Last modified June 17. <http://www.fns.usda.gov/nslp/history>.

<sup>14</sup> Oliveira, Victor. 2014. "Food Assistance Landscape FY 2013 Annual Report." Economic Research Service Economic Information Bulletin, Bulletin Number 120. <http://www.ers.usda.gov/media/1282272/eib120.pdf>.

in the SBP, feeding 13.2 million students. Comparably, in FY 2014, 99,881 schools and RRCIs participated in the NSLP, feeding 30.5 million students, and 90,197 schools and RRCIs participated in SBP, feeding 13.6 million students.<sup>15</sup>

SFAs that have schools that participate in the NSLP or the SBP receive funds to offset the costs of providing F/RP meals. The level of funding is determined by a number of factors, including the number of school meals served and the number of school meals served at F/RP, and whether the school meals meet the Federal requirements for nutrition and school menus.<sup>16</sup>

### 3.1.2 Afterschool Snack Programs

Through the NSLP Afterschool Snack Program, USDA offers cash reimbursement to help schools serve snacks to students in afterschool activities aimed at promoting the health and well-being of children and youth. A school must provide students with regularly scheduled afterschool activities in an organized, structured, and supervised environment, including educational or enrichment activities. Competitive interscholastic sports teams are not typically considered for the program, unless they also offer additional enrichment activities. In addition, the snacks must meet USDA nutritional requirements, and be provided free to children in schools in which 50 percent or more of the children are certified for F/RP meals. In other participating schools that do not meet the 50 percent requirement, any child can purchase a snack through the NSLP Afterschool Snack Program, and snacks are offered free or at reduced price to eligible children.<sup>17</sup>

### 3.1.3 At-Risk Supper Program

The At-Risk Afterschool Meals Program (referred to as the “At-Risk Supper” Program) is a component of CACFP, which is administered at the Federal level and overseen at the State level. These meals are provided by schools or child care centers that sponsor community-based programs offering enrichment activities for at-risk children and youth, ages 18 years and under. At-Risk Supper programs are available only during the school year, when classes are in session. Programs must be offered in areas where at least 50 percent of the children are eligible for F/RP meals under the NSLP, based on the local school attendance area. All At-Risk Supper meals must meet Federal nutrition requirements and must be offered free to all participating children. In SY 2010–11, the HHFKA expanded the program to at-risk children in all 50 States,<sup>18</sup> with retroactive reimbursement available for meals served since October 1, 2010.

---

<sup>15</sup> USDA, FNS, Program Data Branch. 2015. “Program Information Report (Key Data): U.S. Summary, FY 2014 – FY 2015.” Published August. <http://www.fns.usda.gov/sites/default/files/datastatistics/keydata-august-2015.pdf>.

<sup>16</sup> Subchapter A—Child Nutrition Program. 7 CFR §210-215. [http://www.fns.usda.gov/sites/default/files/7cfr210\\_13\\_1.pdf](http://www.fns.usda.gov/sites/default/files/7cfr210_13_1.pdf).

<sup>17</sup> USDA, FNS. 2013. “The School-Based Afterschool Snack Program-Fact Sheet.” Last modified November 1. <http://www.fns.usda.gov/school-meals/afterschool-snacks>.

<sup>18</sup> USDA, FNS. 2015. “At-Risk Afterschool Meals A Child and Adult Care Food Program Handbook.” Revised July. <http://www.fns.usda.gov/sites/default/files/atriskhandbook.pdf>.

### 3.1.4 Seamless Summer Option

The NSLP Seamless Summer Option (SSO) is designed to encourage more SFAs to provide meals during summer and other school vacation periods. It allows SFAs to provide free summer meals in low-income areas during the traditional summer vacation period, and for year-round schools during school vacation periods longer than 10 school days. The SSO is an extension of the NSLP, but also combines features of the SBP and SFSP. Participating SFAs must follow all NSLP regulations and NSLP meal patterns that apply in regular school periods. The SSO may be administered to students in need at school and approved non-school sites such as non-school indoor locations, parks or other outdoor locations, and mobile feeding sites. The program serves children through age 18 at sites located within the geographical boundaries of the attendance area of a school where at least 50 percent of the children were certified eligible for F/RP meals as of the last day of operation of the most recent school year. U.S. Census data can be used to show that 50 percent of the children within the school's geographic boundaries are eligible for F/RP meals. Using Census data, schools may maintain certification for SSO and continue the program for five years. Sites that participate on the basis of individual children's eligibility, closed enrolled sites, and camps must annually determine their eligibility. Schools that participate in CEP may qualify for SSO using the identified student percentage multiplied by 1.6.<sup>19</sup>

Only SFAs administering the NSLP or the SBP may participate in the SSO. However, with SA approval, SFAs may sponsor non-school feeding sites under SSO in which meals are reimbursed at the appropriate NSLP or SBP free rates for all attending children. SFAs must be able to demonstrate the administrative capability and financial viability to operate SSO sites during school vacation periods. SSO sites are categorized based on eligibility (open or restricted open) and the type of enrollment (closed enrolled site, day camp, and migrant).<sup>20</sup>

## 3.2 Research Questions

The SN-OPS research questions associated with program participation include:

- How many schools participate in the SBP and/or the NSLP?

---

<sup>19</sup> USDA, FNS. 2014. "SP39-2014: 2014 Edition of Questions and Answers for the National School Lunch Program's Seamless Summer Option." Published April 21. <http://www.fns.usda.gov/sites/default/files/SP39-2014os.pdf>.

<sup>20</sup> Open enrollment serves children through age 18 within the geographical area in which 50 percent of children are eligible for F/RP meals. Meals are reimbursed through the NSLP and the SBP. Restricted enrollment is a site enrolling on a first come, first served basis, with limited attendance for security reasons; meals are served to children through age 18 based on F/RP geographic requirements. Like open enrollment, closed enrollment is reimbursed at the appropriate NSLP and SBP free rates for all children served. Enrollment sites are categorized as closed enrolled, camps, and migrant. Closed enrollment programs serve only identified eligible children 18 years old and younger. Once more, at least 50 percent of the children enrolled at the site must be approved for F/RP meals, and the site must be located in a geographic area in which a school has at least 50 percent of children approved for F/RP meals. Camps may be residential or non-residential day camps, and must provide regularly scheduled foodservice as part of an organized program for enrolled children. Enrolled children's eligibility status may be determined by information obtained from their schools, applications submitted and approved by LEAs, and direct certified LEAs. Area eligibility cannot be used to establish camp site eligibility. Meals are reimbursed only for children eligible for the NSLP and the SBP. Migrant sites primarily serve children from migrant families through age 18, as certified by a migrant coordinator. Meals are reimbursed for children in attendance at the appropriate NSLP and SBP free rates. See "2014 Edition of Questions and Answers for the National School Lunch Program's Seamless Summer Option," in note above.

- How many schools participate in the NSLP Afterschool Snack Program or the At-Risk Supper program?
- How many schools participating in the SBP are eligible for severe need reimbursement?
- How many schools in each SFA participated as Seamless Summer Option sites in Summer 2013?
- What percentage of students are certified for free or reduced-price meals?
- What was the average daily attendance for students?
- How many breakfast and lunch serving days were in the 2013–14 school year?
- What is the primary format of the system parents use to apply for free or reduced-price meals certification?
- With what other systems are application processing systems integrated?
- Who developed the application processing systems?
- What percentage of districts determine eligibility with an automated system?

### 3.3 Results

#### 3.3.1 SFA and School Participation in the NSLP and the SBP

Although the sample selection criteria for the study only required that SFAs have at least one school participating in the NSLP or the SBP, the vast majority of SFAs reported that all schools in their districts participated in the program in SY 2011–12, SY 2012–13, and SY 2013–14. TABLE 3.1 shows that the percentage of SFAs with all schools participating in the NSLP was 97 percent in SY 2011–12, 96 percent in SY 2012–13, and 97 percent in SY 2013–14. Given the near universal participation of schools in the NSLP, observed SFA participation rates did not statistically differ by grade level across the three school years; that is, SFAs with elementary, middle, and high schools were equally likely (97 to 99 percent) to have all of their schools participating in the NSLP in each year. Across school years, 93 to 94 percent of SFAs had all of their “other” schools (schools with a non-traditional grade structure) participating in the NSLP, which is a statistically significantly lower participation rate than their elementary schools, middle schools, and high schools.

TABLE 3.1 also reports participation rates for the SBP. In SY 2013–14, 86 percent of SFAs reported that all their schools participated in the SBP, a statistically significant increase from 80 percent in SY 2012–13, and 79 percent in SY 2011–12. SFAs with schools listed as other experienced an increase of approximately 7 percentage points (from 78 percent to 85 percent) in SBP participation rates across the three school years, but continued to have the lowest rates among all grade levels in SY 2013–14, at 85 percent.

Participation in the SBP increased over the years, but was still consistently lower than participation in the NSLP. Participation in the SBP was 11 to 18 percentage points lower than in the NSLP, but an obvious conclusion from TABLE 3.1 is that the SBP is “catching up” with the NSLP in terms of participation rates. Interestingly, the estimates in the lower portion of TABLE 3.1 (i.e., those concerning the SBP) indicate that SFA’s reported participation rates were higher in SY 2013–14 than SY 2012–13 for SFAs with each type of school, with the largest increase for other schools. While the increases are not individually statistically significant, their combined effect is a statistically significant increase in participation in the SBP by our Nation’s public schools.

TABLE 3.1 *Percentage of SFAs With All Schools Within Each Grade Level Participating in the NSLP and the SBP, SY 2011–12, SY 2012–13, and SY 2013–14*

Grade level	SY 2011–12		SY 2012–13		SY 2013–14	
	Percent of SFAs	Wgtd <i>n</i> (Unwgted <i>n</i> ) <sup>1</sup>	Percent of SFAs	Wgtd <i>n</i> (Unwgted <i>n</i> ) <sup>2</sup>	Percent of SFAs	Wgtd <i>n</i> (Unwgted <i>n</i> ) <sup>3</sup>
<b>NSLP</b>						
Elementary	99.1	12,495 (1,281)	98.5	12,332 (1,335)	97.3	11,913 (1,375)
Middle	99.7	9,410 (1,097)	99.0	9,225 (1,145)	99.2	8,871 (1,172)
High	99.0	10,828 (1,182)	98.3	10,622 (1,225)	98.2	10,117 (1,253)
Other	92.7	4,569 (547)	94.3	5,024 (552)	93.8	4,525 (574)
All Schools	96.6	14,533 (1,389)	96.3	15,070 (1,490)	96.9	15,160 (1,598)
<b>SBP</b>						
Elementary	85.9	12,495 (1,281)	86.4	12,332 (1,335)	88.5	11,882 (1,372)
Middle	88.2	9,410 (1,097)	88.5	9,225 (1,145)	91.0	8,851 (1,171)
High	88.1	10,828 (1,182)	88.8	10,622 (1,225)	91.0	10,090 (1,250)
Other	77.8	4,569 (547)	79.6	5,024 (552)	84.7	4,525 (574)
All Schools	78.8	14,533 (1,389)	80.3	15,070 (1,490)	<sup>a</sup> 85.7	15,160 (1,598)

<sup>1</sup> *n* is less than 1,401 because not all SFAs have each type of school, and 12 SFAs provided implausible school count data.

<sup>2</sup> *n* is less than 1,491 because not all SFAs have each type of school, and 1 SFA provided implausible school count data.

<sup>3</sup> *n* is less than 1,598 because not all SFAs have each type of school.

<sup>a</sup> Percentage of SFAs with all schools that participated in the SBP differed significantly between SY 2011–12 and SY 2013–14.

**Note:** The percentage of SFAs with elementary, middle, high, and other schools participating in the NSLP or the SBP did not individually differ significantly between SY 2011–12 and SY 2012–13, and between SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2011–12, question 2.1; SFA Director Survey SY 2012–13, question 1.1; SFA Director Survey SY 2013–14, question 1.1.

### Severe Need Schools

Qualifying SFAs may seek severe need reimbursements to help cover the costs of the SBP meals. SFAs with eligible schools must demonstrate that 40 percent or more of the lunches served to students in the prior second preceding year were served at F/RP.<sup>21</sup> Participating schools then receive up to 23 cents more than the normal reimbursements for F/RP breakfasts, and agree to charge no more than 30 cents for a reduced-price breakfast.

TABLE 3.2 shows that among the SFAs with schools participating in the SBP, the percentage that receive severe need reimbursements increased significantly between SY 2011–12 and SY 2012–13, but not between SY 2012–13 and SY 2013–14 at all SFA grade levels. This pattern is consistent with the “catching up” trend noted above. As the SBP penetrates more and more SFAs, it seems likely that the places that qualified for the severe need reimbursement chose to participate early; hence, a smaller and smaller fraction of newly participating schools are eligible for the reimbursement, slowing the growth in the SFA utilization rate. Based on the reported number *total* schools in SY 2012-13 and SY 2013-14 SFA directors’ surveys, the number of schools getting the severe need reimbursements continued to increase, however.<sup>22</sup>

---

<sup>21</sup> School Breakfast Program. 7 CFR §220.9(e). <http://www.gpo.gov/fdsys/pkg/CFR-2012-title7-vol4/pdf/CFR-2012-title7-vol4-sec220-1.pdf>.

<sup>22</sup> The point estimates (95 percent confidence intervals) were 69,678 (65,745 – 73,611) and 75,883 (64,902 – 86,864), for SY 2012-13 and SY 2013-14, respectively.

TABLE 3.2 *Among SFAs That Participate in the SBP, the Percentage That Receive SBP Severe Need Reimbursement, SY 2011–12, SY 2012–13, and SY 2013–14*

Grade Level <sup>1</sup>	SY 2011–12		SY 2012–13		SY 2013–14	
	Percent of SFAs	Wgtd <i>n</i> (Unwgted <i>n</i> ) <sup>2</sup>	Percent of SFAs	Wgtd <i>n</i> (Unwgted <i>n</i> ) <sup>2</sup>	Percent of SFAs	Wgtd <i>n</i> (Unwgted <i>n</i> ) <sup>2</sup>
Elementary Schools	73.3	11,498 (936)	<sup>a</sup> 80.9	11,011 (921)	80.1	10,388 (872)
Middle Schools	64.9	8,711 (813)	<sup>a</sup> 70.6	8,226 (798)	73.0	7,740 (750)
High Schools	61.6	9,778 (861)	<sup>a</sup> 68.6	9,557 (852)	69.7	8,474 (783)
Other Schools	67.8	3,900 (386)	<sup>a</sup> 67.1	4,055 (358)	68.6	3,630 (341)
All Schools	73.9	13,141 (1,014)	<sup>a</sup> 80.6	13,182 (1,017)	79.8	12,067 (943)

<sup>1</sup> Of the SFAs that reported having that type of school.

<sup>2</sup> *n* equals the number of SFAs that participated in the SBP for each school type for a particular school year.

<sup>a</sup> The percentage of SFAs that participate in the SBP as severe need differed significantly between SY 2011–12 and SY 2012–13.

**Note:** The percentage was calculated based on 1,069 SFAs that participated in all three survey years.

**Source:** SFA Director Survey SY 2011–12, question 2.2; SFA Director Survey SY 2012–13, question 1.3; SFA Director Survey SY 2013–14, question 1.2c.

TABLE 3.3 reports the percentage of SFAs participating in the SBP that received severe need reimbursements by grade level and SFA characteristics. Mainly, the estimates in TABLE 3.3 indicate the relationship between the use of the severe need reimbursements and SFA size, urbanicity, and SFA poverty levels. For each column (SFAs with elementary, middle, high, other, and the aggregate of all schools), there was a significant association with the SFA characteristics. With respect to SFA size, it is clear that the larger SFAs were associated with the larger percentages of their schools participating as severe need schools. Similarly, SFAs located in cities had the largest participation rates, followed by towns, rural areas, and, lastly, suburban areas. Of course, the association with poverty levels is expected given the eligibility requirements for the reimbursement. Generally speaking, these patterns held over all SFA school types; hence, it is clear that participation in the SBP as severe need schools was most prevalent in SFAs who served a high percentage of their lunches at F/RP, were located in cities, and tended to be relatively large.

TABLE 3.3 Percentage of SFAs Participating in the SBP as Severe Need Schools, by SFA Characteristics, SY 2013–14

SFA Characteristics	With Elementary Schools			With Middle Schools			With High Schools			With Other Schools			All SFAs		
	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>
All SFAs	77.2	10,634	<sup>a</sup> 1,281	69.6	7,951	<sup>b</sup> 1,091	66.1	8,805	<sup>c</sup> 1,147	67.6	3,951	<sup>d</sup> 503	77.5	12,672	1,406
<b>SFA size</b> <sup>1</sup>															
Small (1-999)	71.3	4,445	221	60.9	2,611	131	60.8	3,078	151	59.8	2,070	99	73.6	6,172	300
Medium (1,000-4,999)	77.3	4,456	512	68.9	3,683	434	63.8	4,099	473	74.4	1,093	124	76.9	4,712	541
Large (5,000-24,999)	91.2	1,455	364	82.2	1,392	350	78.8	1,350	340	74.6	610	160	90.9	1,501	376
Very Large (25,000+)	98.8	278	184	98.8	265	176	97.8	278	183	92.4	178	120	99.5	287	189
<b>Urbanicity</b> <sup>2</sup>															
City	90.3	960	228	89.8	724	208	87.8	688	208	82.2	473	121	88.5	1,257	250
Suburban	67.3	1,965	348	57.7	1,698	320	52.7	1,742	322	62.5	476	122	68.2	2,172	373
Town	84.4	2,199	251	76.7	1,830	219	70.0	1,983	231	78.9	734	82	83.8	2,359	260
Rural	75.5	5,243	430	68.0	3,500	325	66.8	4,162	365	59.4	1,989	161	75.2	6,157	478
<b>Poverty level</b> <sup>3</sup>															
Low (0-29 percent F/RP)	30.9	1,880	252	18.0	1,474	219	16.2	1,697	238	29.2	509	66	29.7	2,277	284
Medium (30-59 percent F/RP)	82.9	5,237	614	75.0	3,952	525	68.8	4,413	550	62.2	1,869	244	82.7	5,844	651
High (60 percent or more F/RP)	93.6	3,517	415	91.2	2,524	347	93.2	2,695	359	86.4	1,573	193	94.7	4,550	471

<sup>1</sup> Percentage of SFAs with elementary, middle, high, “other,” and all schools participating in the SBP as severe need schools differed significantly by SFA size in SY 2013-14.

<sup>2</sup> Percentage of SFAs with elementary, middle, high, “other” and all schools participating in the SBP as severe need schools differed significantly by urbanicity in SY 2013-14.

<sup>3</sup> Percentage of SFAs with elementary, middle, high, “other,” and all schools participating in the SBP as severe need schools differed significantly by poverty level in SY 2013-14.

<sup>a</sup> *n* is less than the 1,382 SFAs that reported having elementary schools due to item nonresponse.

<sup>b</sup> *n* is less than the 1,180 SFAs that reported having middle schools due to item nonresponse.

<sup>c</sup> *n* is less than the 1,259 SFAs that reported having high schools due to item nonresponse.

<sup>d</sup> *n* is less than the 585 SFAs that reported having “other” schools due to item nonresponse.

**Note:** SFAs may have all types of schools (elementary, middle, high, and other); therefore, percentages and counts will not add up horizontally. Estimates in this table are based on the 1,598 SFAs who responded to the SY 2013-14 survey.

**Source:** SFA Director Survey SY 2013-14, question 1.2d.

### 3.3.2 Percent of Students Approved for Free or Reduced-Price Meals

TABLE 3.4 highlights a trend of increasing percentages of students approved for free meals. This trend probably resulted from several factors, such as increased participation in CEP. FNS and SAs working with SFAs continually seek to improve the processes for determining eligibility—from efforts to increase direct certification and identify categorically eligible students<sup>23</sup> to better procedures for identifying potential participants. Many of these specific efforts are analyzed in the remainder of this report; TABLE 3.4 provides aggregate evidence that, in total, these efforts are working. Specifically, the percentage of students in all SFA schools who were approved for free meals increased significantly from 42 percent in SY 2011–12 to 45 percent in SY 2013–14. A second finding from TABLE 3.4 is that for SFAs with both elementary schools and other schools, the percentage of students approved for free meals was significantly higher in SY 2013–14 compared to SY 2012–13. This finding may result from the smaller scale of operations for these schools. At a smaller scale it is easier to identify students and work with families to increase both applications and certifications.

Regarding reduced-price meals, TABLE 3.5 shows the percentage of students approved for reduced-price meals by grade level for each year in SN-OPS. There is no obvious pattern in TABLE 3.5. This may mean that the SFAs have successfully identified and certified this group of participants and that their overall proportion in the student populations has not changed appreciably. On the other hand, it may also reflect the fact that many programmatic changes have been specifically directed at identification and certification of students eligible for free meals. One such programmatic change could be an increase in the number of SFAs participating in CEP and not claiming RP meals.

---

<sup>23</sup> Direct certification refers to the use of participation in other means-tests programs, such as SNAP, to determine eligibility for the NSLP and the SBP. The 2004 Child Nutrition and WIC Reauthorization Act requires all States to directly certify students in SNAP households. Children in households that receive TANF, Food Distribution Program on Indian Reservations (FDPIR), fosters children, certain children enrolled in federally funded Head Start or Even Start programs, and certain homeless, runaway, and migrant children are also categorically eligible for free meals.

TABLE 3.4 *Percentage of Students Approved for Free Meals, SY 2011–12, SY 2012–13, and SY 2013–14*

Grade Level <sup>1</sup>	SY 2011–12 (percent)	SY 2012–13 (percent)	SY 2013–14 (percent)
Elementary	45.3	<sup>a</sup> 45.6	<sup>b</sup> 46.8
Middle	41.4	<sup>a</sup> 42.7	42.8
High	35.0	<sup>a</sup> 36.4	37.4
Other	48.4	46.8	48.5
All schools	42.1	<sup>a</sup> 43.4	<sup>b</sup> 44.6

<sup>1</sup> Of the SFAs that reported having that type of school.

<sup>a</sup> The percentage of students approved for free meals differed significantly for elementary schools, middle schools, high schools, and all schools between SY 2011–12 and SY 2012–13.

<sup>b</sup> The percentage of students approved for free meals differed significantly for elementary schools and all schools between SY 2012–13 and SY 2013–14.

**Note:** The percentage was calculated based on 1,069 SFAs that participated in all three years of the survey.

**Source:** SFA Director Survey SY 2011–12, question 3.1; SFA Director Survey SY 2012–13, question 2.1; SFA Director Survey SY 2013–14, question 2.1.

TABLE 3.5 *Percentage of Students Approved for Reduced-Price Meals, SY 2011–12, SY 2012–13, and SY 2013–14*

Grade Level <sup>1</sup>	SY 2011–12 (percent)	SY 2012–13 (percent)	SY 2013–14 (percent)
Elementary	9.0	8.8	8.6
Middle	9.5	9.5	9.2
High	8.7	8.6	8.5
Other	9.4	9.1	10.8
All Schools	9.0	9.0	9.1

<sup>1</sup> Of the SFAs that reported having that type of school.

**Note:** The percentage was calculated based on 1,069 SFAs that participated in all three years of the survey. The percentage of students approved for reduced-price meals did not differ significantly for each grade level between SY 2011–12 and SY 2012–13 or between SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2011–12, question 3.1; SFA Director Survey SY 2012–13, question 2.1; SFA Director Survey SY 2013–14, question 2.1.

### *Afterschool Snack Program*

As shown in TABLE 3.6, 33 percent of SFAs participated in the Afterschool Snack Program in SY 2013–14. Moreover, statistical tests of association confirm that participation varied by SFA size, urbanicity, and poverty level. In particular, larger SFAs, those located in cities, and those with higher percentages of their students qualifying for F/RP lunches participated more frequently. However, participation simply indicates that at least one of the SFA's schools participates. TABLE 3.7 provides more context on participation in the Afterschool Snack Program, with estimates of the number of schools that participated. As shown, approximately 24,000 schools, most of which were at the elementary level,

participated in SY 2013–14. This estimate provides a baseline for future studies of participation in the Afterschool Snack Program.

TABLE 3.6 Percent of SFAs Participating in the Afterschool Snack Program, by SFA Characteristics, SY 2013–14

SFA Characteristics	With Elementary Schools			With Middle Schools			With High Schools			With Other Schools			All SFAs		
	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>
All SFAs	33.3	11,902	<sup>a</sup> 1,373	22.9	8,848	<sup>b</sup> 1,167	13.6	10,097	<sup>c</sup> 1,249	19.5	4,537	<sup>d</sup> 572	33.2	15,160	1,598
<b>SFA size<sup>1</sup></b>															
Small (1–999)	26.3	5,338	264	17.4	3,070	153	11.5	3,924	192	18.2	2,383	115	27.1	7,919	383
Medium (1,000–4,999)	31.2	4,797	552	20.7	4,079	478	11.9	4,465	514	20.3	1,272	145	32.8	5,297	608
Large (5,000–24,999)	56.8	1,491	374	34.5	1,434	360	18.9	1,429	359	18.7	684	180	56.5	1,650	413
Very large (25,000+)	77.0	276	183	60.1	265	176	41.6	278	184	32.9	197	132	75.5	294	194
<b>Urbanicity<sup>2</sup></b>															
City	52.2	1,010	233	46.5	767	210	32.9	726	212	27.1	464	130	51.0	1,387	268
Suburban	23.5	2,287	380	16.7	2,033	357	10.8	2,009	350	13.5	601	144	21.9	2,757	433
Town	41.3	2,311	264	23.6	1,979	235	12.1	2,193	252	14.6	936	100	38.7	2,709	290
Rural	29.5	5,851	463	20.2	3,834	343	12.2	4,814	407	16.0	2,234	179	30.0	7,224	545
<b>Poverty Level<sup>3</sup></b>															
Low (0–29 percent F/RP)	8.9	2,373	302	6.3	1,979	270	3.9	2,212	287	7.3	622	89	8.9	3,113	360
Medium (30–59 percent F/RP)	31.9	5,787	648	19.2	4,260	549	10.5	5,019	597	16.0	2,241	282	32.1	6,927	728
High (60 percent or more F/RP)	50.9	3,742	423	41.7	2,609	348	26.4	2,866	365	28.7	1,674	201	49.5	5,120	510

<sup>1</sup> Percentage of SFAs with elementary, middle, high and all schools participating in the Afterschool Snack program differed significantly by SFA size in SY 2013–14.

<sup>2</sup> Percentage of SFAs with elementary, middle, high, other, and all schools participating in the Afterschool Snack program differed significantly by urbanicity in SY 2013–14.

<sup>3</sup> Percentage of SFAs with elementary, middle, high, other, and all schools participating in the Afterschool Snack program differed significantly by poverty level in SY 2013–14.

<sup>a</sup> *n* is less than the 1,382 SFAs that reported having elementary schools due to item nonresponse.

<sup>b</sup> *n* is less than the 1,180 SFAs that reported having middle schools due to item nonresponse.

<sup>c</sup> *n* is less than the 1,259 SFAs that reported having high schools due to item nonresponse.

<sup>d</sup> *n* is less than the 585 SFAs that reported having other schools due to item nonresponse.

**Note:** SFAs may have all types of schools (elementary, middle, high, and other); therefore, percentages and counts will not add up horizontally.

**Source:** SFA Director Survey SY 2013–14, question 1.2a.

TABLE 3.7 *Estimated Number of Schools Participating in the Afterschool Snack Program, as Reported by SFAs, SY 2013–14*

Grade Level <sup>1</sup>	Estimated Number of Schools	Number of SFAs Wgtd <i>n</i>	Number of SFAs Unwgted <i>n</i> <sup>2</sup>
Elementary Schools	16,333	15,073	1,588
Middle Schools	3,827	15,069	1,586
High Schools	2,173	15,072	1,587
Other Schools	1,852	15,072	1,587
All SFAs	24,184	15,160	1,598

<sup>1</sup> Of the SFAs that reported having that type of school.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

Source: SFA Director Survey SY 2013–14, question 1.2.

### *At-Risk Supper Program*

In SY 2013–14, 5 percent of all SFAs, 4 percent of SFAs with elementary schools, 4 percent with middle schools, 3 percent with high schools, and 3 percent of SFAs with other schools participated in the At-Risk Supper Program (TABLE 3.8). Additionally, SFAs reported that 5,468 schools (mostly elementary schools) participated in the At-Risk Supper Program (TABLE 3.9). Given that the At-Risk Supper Program sites are in areas where at least 50 percent of the children in the school attendance zone are eligible for F/RP school meals, it is not surprising that, in SY 2013–14, SFAs serving high percentages of F/RP lunches had significantly higher participation rates than SFAs with low or medium poverty levels, since higher poverty levels would qualify more SFAs to participate in the At-Risk Supper Program. SFAs with high poverty levels had participation levels two to five times larger than SFA schools with low or medium poverty levels. Like the Afterschool Snack Program, very large SFA size (30 percent), city location (14 percent), and high poverty levels (8 percent) coincided with higher participation rates in the At-Risk Supper Program.

TABLE 3.8 Percentage of SFAs Participating in the At-Risk Supper Program, by SFA Characteristics, SY 2013–14

SFA Characteristics	With Elementary Schools			With Middle Schools			With High Schools			With Other Schools			All SFAs		
	Percent of SFAs	Wgtd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgtd <i>n</i>	Unwgt'd <i>n</i>
All SFAs	4.2	11,895	<sup>a</sup> 1,373	3.6	8,851	<sup>b</sup> 1,170	2.6	10,097	<sup>c</sup> 1,251	2.5	4,543	<sup>d</sup> 574	4.5	15,160	1,598
<b>SFA size</b> <sup>1</sup>															
Small (1–999)	2.2	5,338	264	1.3	3,070	153	0.9	3,924	192	2.5	2,383	115	2.5	7,919	383
Medium (1,000–4,999)	3.5	4,784	550	3.4	4,072	477	2.9	4,458	513	0.6	1,272	145	4.3	5,297	608
Large (5,000–24,999)	9.5	1,495	375	5.8	1,441	362	3.3	1,433	360	4.2	688	181	10.7	1,650	413
Very large (25,000+)	26.0	278	184	22.3	269	178	17.8	282	186	7.8	199	133	29.5	294	194
<b>Urbanicity</b> <sup>2</sup>															
City	15.8	1,014	234	14.5	776	213	12.1	731	214	6.7	470	132	13.8	1,387	268
Suburban	4.2	2,282	380	4.3	2,028	357	2.7	2,003	350	2.6	601	144	6.5	2,757	433
Town	1.6	2,305	263	0.7	1,979	235	0.3	2,193	252	2.2	936	100	2.1	2,709	290
Rural	2.6	5,851	463	2.0	3,834	343	1.9	4,814	407	1.2	2,234	179	2.6	7,224	545
<b>Poverty Level</b> <sup>3</sup>															
Low (0–29 percent F/RP)	1.5	2,373	302	2.6	1,979	270	1.4	2,212	287	1.7	622	89	2.1	3,113	360
Medium (30–59 percent F/RP)	3.6	5,785	648	2.4	4,267	551	1.8	5,024	599	1.0	2,245	283	3.5	6,927	728
High (60 percent or more F/RP)	6.9	3,737	423	6.4	2,605	349	5.0	2,861	365	5.3	1,675	202	7.5	5,120	510

<sup>1</sup> Percentage of SFAs with elementary, middle, high and all schools participating in the At-Risk Supper program differed significantly by SFA size in SY 2013–14.

<sup>2</sup> Percentage of SFAs with elementary, middle, high, and all schools participating in the At-Risk Supper program differed significantly by urbanicity in SY 2013–14.

<sup>3</sup> Percentage of SFAs with elementary, middle, high, other, and all schools participating in the At-Risk Supper program differed significantly by poverty level in SY 2013–14.

<sup>a</sup> *n* is less than the 1,382 SFAs that reported having elementary schools due to item nonresponse.

<sup>b</sup> *n* is less than the 1,180 SFAs that reported having middle schools due to item nonresponse.

<sup>c</sup> *n* is less than the 1,259 SFAs that reported having high schools due to item nonresponse.

<sup>d</sup> *n* is less than the 585 SFAs that reported having other schools due to item nonresponse.

**Note:** SFAs may have all types of schools (elementary, middle, high, and other); therefore, percentages and counts will not add up horizontally.

**Source:** SFA Director Survey SY 2013–14, question 1.2b.

TABLE 3.9 *Number of Schools Participating in the At-Risk Supper Program, SY 2013–14*

Grade Level <sup>1</sup>	Number of Schools	Number of SFAs Wgtd <i>n</i>	Number of SFAs Unwgted <i>n</i> <sup>2</sup>
Elementary Schools	3,443	15,066	1,588
Middle Schools	950	15,072	1,589
High Schools	640	15,072	1,589
Other Schools	436	15,070	1,588
All SFAs	5,468	15,160	1,598

<sup>1</sup> Of the SFAs that reported having that type of school.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

Source: SFA Director Survey SY 2013–14, question 1.2.

### 3.3.3 Seamless Summer Option

SFAs reported that 10,540 schools participated in the NSLP Seamless Summer Option in Summer 2013. Of the 10,540 schools that participated, 5,993 were elementary schools, 1,742 were middle schools, 1,862 were high schools, and 944 were other schools (TABLE 3.10).

TABLE 3.10 *Number of Schools That Participated as Seamless Summer Option Sites in Summer 2013*

Grade Level <sup>1</sup>	Number of Schools	Number of SFAs Wgtd <i>n</i>	Number of SFAs Unwgted <i>n</i> <sup>2</sup>
Elementary Schools	5,993	15,067	1,588
Middle Schools	1,742	15,073	1,587
High Schools	1,862	15,074	1,587
Other Schools	944	15,062	1,586
All SFAs	10,540	15,160	1,598

<sup>1</sup> Of the SFAs that reported having that type of school.

<sup>2</sup> *n* is less than 1,598 due to item non-response.

Source: SFA Director Survey SY 2013–14, question 1.2d.

TABLE 3.11 shows the percentage of SFAs participating in the Seamless Summer Option in SY 2013–14 by their SFA characteristics. Very large SFAs (44 percent), large SFAs (32 percent), SFAs located in cities (25 percent), and SFAs with high poverty (24 percent) had significantly higher participation rates across all grade levels. Moreover, participation in the Seamless Summer Option differed significantly by both SFA size and poverty level at all grade levels. Excluding elementary schools, participation rates also differed significantly at all grade levels by urbanicity. During the summer of 2013, 16 percent of all SFAs, 17 percent of SFAs with elementary schools, 10 percent of SFAs with middle schools, 11 percent of SFAs with high schools, and 7 percent with other schools participated in the Seamless Summer Option.

Looking at the SFA participation rates for elementary schools, middle schools, high schools, and other schools, the very large SFAs had the highest participation in the Seamless Summer Option, significantly higher than other sizes of SFAs, across all grade levels, with a 40 percent participation rate for

elementary schools, 35 percent for middle schools, 33 percent for high schools, and 18 percent for other schools. Correspondingly, significantly lower participation rates were found in the small SFAs (13 percent of elementary schools, 9 percent of middle schools, 11 percent of high schools, and 6 percent of other schools).

Given that the Seamless Summer Option is intended to address the nutritional needs of children who are 18 years or younger in low-income areas, it is not surprising to find that in city locations, the program had a much larger impact, with higher rates of participation at all grade levels. City SFAs had significantly higher participation rates (26 percent for elementary schools, 20 percent for middle schools, 22 percent for high schools, and 25 percent for all schools) in the Seamless Summer Option at all grade levels when compared to the other categories of urbanicity. SFAs in towns had the second highest participation rates across all grade levels (18 percent for elementary schools, 10 percent for middle schools, 7 percent for other schools, and 19 percent for all schools) except for high schools (11 percent). On average, the participation rates for the schools of city SFAs were 20 percent or more.

SFA participation rates in the Seamless Summer Option also differed significantly for elementary, middle, high, other, and all schools by poverty level. The highest participation rates were observed in high poverty SFAs with participation rates of 26 percent (elementary schools), 18 percent (middle schools), 18 percent (high schools), 12 percent (other schools), and 24 percent (all schools), which were significantly higher than SFAs in low or medium poverty level groups. SFAs categorized as low poverty had the lowest participation rate across all grade levels, significantly lower than SFAs in low or medium poverty levels. As presented in TABLE 3.11, 5 percent of elementary schools in low poverty SFAs participated in the Seamless Summer Option, and 4 percent, 3 percent, and 5 percent for middle schools, high schools, and all schools participated in that program, respectively.

In comparing participation across grade levels, elementary schools had the highest participation rates regardless of SFA characteristic. Participation rates for middle schools and high schools were similar for each characteristic category. By SFA size, elementary schools in larger SFAs were most likely to be participating in a Seamless Summer Options program, while other schools in medium-sized SFAs were least likely to participate. By urbanicity, SFAs with elementary schools in cities were most likely to participate in the Seamless Summer Option, whereas other schools in rural areas were least likely to participate. By poverty levels, SFAs with elementary schools in high poverty areas were most likely to participate in the Seamless Summer Option, whereas the other schools in low poverty areas were least likely to participate. Ultimately, SFAs with elementary schools had the highest participation rates by SFA size, urbanicity, and poverty level, while other schools had the lowest participation rates in each of the respective SFA characteristics.

TABLE 3.11 Percentage of SFAs Participating in the Seamless Summer Option, by SFA Characteristics, Summer 2013

SFA Characteristics	With Elementary Schools			With Middle Schools			With High Schools			With Other Schools			All SFAs		
	Percent of SFAs	Wgt'd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgt'd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgt'd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgt'd <i>n</i>	Unwgt'd <i>n</i>	Percent of SFAs	Wgt'd <i>n</i>	Unwgt'd <i>n</i>
All SFAs	16.5	11,895	<sup>a</sup> 1,373	10.3	8,852	<sup>b</sup> 1,168	10.8	10,099	<sup>c</sup> 1,249	7.3	4,527	<sup>d</sup> 571	15.9	15,160	1,598
<b>SFA size</b> <sup>1</sup>															
Small (1–999)	13.4	5,338	264	9.3	3,070	153	11.1	3,924	192	5.6	2,383	115	11.7	7,919	383
Medium (1,000–4,999)	15.0	4,786	551	7.5	4,079	478	7.9	4,465	514	4.6	1,261	144	15.9	5,297	608
Large (5,000–24,999)	28.2	1,495	375	15.6	1,438	361	14.7	1,433	360	15.1	685	180	31.8	1,650	413
Very Large (25,000+)	40.3	277	183	35.4	265	176	32.8	277	183	17.7	197	132	43.8	294	194
<b>Urbanicity</b> <sup>2</sup>															
City	25.8	1,012	233	20.3	771	211	21.7	729	213	19.3	465	130	25.4	1,387	268
Suburban	15.9	2,289	381	9.4	2,033	357	7.0	2,007	349	7.4	601	144	15.0	2,757	433
Town	17.5	2,311	264	10.2	1,979	235	10.6	2,193	252	7.0	936	100	18.5	2,709	290
Rural	15.0	5,840	462	8.4	3,834	343	10.8	4,814	407	5.0	2,224	178	14.8	7,224	545
<b>Poverty Level</b> <sup>3</sup>															
Low (0–29 percent F/RP)	4.9	2,373	302	3.6	1,976	269	3.2	2,211	286	0.5	622	89	5.2	3,113	360
Medium (30–59 percent F/RP)	15.2	5,780	648	8.5	4,267	551	10.0	5,024	599	5.7	2,235	282	14.9	6,927	728
High (60 percent or more F/RP)	25.9	3,742	423	18.3	2,609	348	18.1	2,865	364	11.9	1,670	200	23.9	5,120	510

<sup>1</sup> Percentage of SFAs with elementary, middle, high, other, and all schools participating in the Seamless Summer Option program differed significantly by SFA size in SY 2013–14.

<sup>2</sup> Percentage of SFAs with middle, high, other and all schools participating in the Seamless Summer Option program differed significantly by urbanicity in SY 2013–14.

<sup>3</sup> Percentage of SFAs with elementary, middle, high, other, and all schools participating in the Seamless Summer Option program differed significantly by poverty level in SY 2013–14.

<sup>a</sup> *n* is less than the 1,382 SFAs that reported having elementary schools due to item nonresponse.

<sup>b</sup> *n* is less than the 1,180 SFAs that reported having middle schools due to item nonresponse.

<sup>c</sup> *n* is less than the 1,259 SFAs that reported having high schools due to item nonresponse.

<sup>d</sup> *n* is less than the 585 SFAs that reported having other schools due to item nonresponse.

**Note:** SFAs may have all types of schools (elementary, middle, high, and other); therefore, percentages and counts will not add up horizontally.

**Source:** SFA Director Survey SY 2013–14, question 1.2d.

### 3.3.4 Average Daily Attendance and Number of Serving Days

TABLE 3.12 reports that the average daily attendance in SFAs in October of SY 2013–14 was 90 percent for all schools, 90 percent for elementary schools, 89 percent for middle schools, 89 percent for high schools, and 88 percent for other schools; differences between the attendance levels were not statistically significant.

SFAs with elementary, middle, and high schools served breakfast and lunch on 159 to 161 days in SY 2013–14 (TABLE 3.13); no significant differences were noted by grade level. However, other schools served lunch and breakfast on 7 to 9 more days than other grade levels in SY 2013–14, indicating that the other schools category includes alternative schools that often require more school days than traditional schools.

TABLE 3.12 *The Average Daily Attendance Rate for October 2013, SY 2013–14*

Grade Level	Average Daily Attendance (Percent)	Total SFAs	
		Wgtd <i>n</i>	Unwgtd <i>n</i>
Elementary School	89.5	10,233	1,149
Middle School	89.4	7,251	956
High School	89.0	8,529	1,044
Other School	87.9	4,181	483
Total	89.9	8,145	959

Source: SFA Director Survey SY 2013–14, question 2.1.

TABLE 3.13 *Number of Serving Days for Breakfast and Lunch in SY 2013–14*

Grade Level	Breakfast	Total SFAs		Lunch	Total SFAs	
		Wgtd <i>n</i>	Unwgtd <i>n</i>		Wgtd <i>n</i>	Unwgtd <i>n</i>
Elementary School	160	10,856	1,270	161	11,658	1,338
Middle School	160	7,903	1,079	160	8,563	1,139
High School	159	9,547	1,193	159	10,055	1,236
Other School	169	4,297	532	168	4,745	572

Source: SFA Director Survey SY 2013–14, question 2.2.

### 3.3.5 Formats of the Application that Parents Use to Apply for Free or Reduced-Price School Meals for Their Children

Since the burden associated with applying for F/RP meals is a primary barrier to families' participation, it is important to understand the ways in which families apply, so that those channels can be prioritized for improvements. One of the stated goals of the HHFKA is to effectively eliminate the need for paper applications in high poverty areas through CEP, which expands access to free meals to all students based on eligibility within an entire LEA, a group of schools within an LEA, or a single school within an LEA. Now that the provision is available nationwide, parents with children attending CEP-qualified schools do not

need to submit applications for F/RP meals, although some schools may continue to collect individual applications to apply for other CN programs.

In SY 2013–14, SFAs reported that more parents applied for F/RP school meals for their children manually/using paper-based applications (88 percent) than via Web- or computer-based applications (21 percent) or computer-read or scannable paper applications (11 percent; TABLE 3.14). This might indicate that either few SFAs offer non-manual application formats to families, or that parents do not use such options when they are available.

TABLE 3.14 *Formats of the Application That Parents Used to Apply for Free or Reduced-Price School Meals for Their Children, as Reported by SFAs, SY 2013–14*

Formats	Percent of SFAs	Wgtd <i>n</i>	Unwgted <i>n</i>
Web- or Computer-Based Application	21.3	3,224	536
Computer-Read or Scannable Paper	10.9	1,658	325
Manual	88.3	13,380	1,375
No Parents Submitted Applications for School Meals	6.7	1,015	72

**Note:** SFAs could select more than one format, so the percentages of SFAs do not add up to 100 percent.

**Source:** SFA Director Survey 2013–14, question 3.4.

### 3.3.6 Determination of Eligibility by Basis of Eligibility

Determinations of eligibility for F/RP school meals were primarily made on a manual basis in SY 2013–14. TABLE 3.15 indicates that approximately 72 percent of eligibility based on homeless, migrant, or runaway status was manually determined; the same can be observed for eligibility based on Head Start/Even Start participation (69 percent); foster child status (65 percent); and household income (55 percent). Assistance program case number (e.g., SNAP, TANF) was the only basis that used an automated determination system more often (56 percent) than the manual alternative (44 percent).

Although manual determination was also more prevalent in cases based on household income eligibility (55 percent), a sizeable percentage of household income eligibility determinations (45 percent) used automated methods. Both household income and assistance program case number methods had higher usage of automated determination than the other eligibility bases.

TABLE 3.15 *Determination of Eligibility for Free or Reduced-Price School Meals, by Basis of Eligibility, as Reported by SFAs, SY 2013–14*

Basis for Eligibility	Manual Determination (percent)	Automated Determination (percent)	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>
Household Income	54.6	45.4	13,813	1,498
Assistance Program Case Number (e.g., SNAP or TANF)	43.6	56.4	13,646	1,488
Child Enrolled in Head Start or Even Start	69.3	30.7	10,893	1,228
Foster Child	65.2	34.8	13,451	1,477
Homeless, Migrant, or Runaway Child	71.2	28.8	13,354	1,469

<sup>1</sup> *n* is less than 1,598 due to item nonresponse.

**Note:** SFAs may use more than one basis for eligibility, so the percentages do not add up to 100 percent vertically.

**Source:** SFA Director Survey 2013–14, question 3.8

### 3.3.7 Integration with Other Online Systems for SFAs Where the Primary Format of the Application for Free or Reduced-Price Meals is Web- or Computer-Based

TABLE 3.16 shows the integration with other online systems for SFAs whose primary application format for F/RP meals was Web-or computer-based. Among these SFAs, a majority had systems that integrated with a meals claiming system (87 percent), a point-of-sale system (88 percent), a direct certification system (83 percent), and student records (70 percent). This seems to indicate a trend toward system integration for the F/RP meals, such that most of the procedures relating to service of the free meals (detection of the student's eligibility status, meal service to the applicable students, and filing of the claims for the meals served to the applicable students) are all primarily integrated. A few SFAs (3 percent) integrated their computer-based system with a student records system.

Direct certification is achieved by matching student enrollment lists against SNAP and other assistance agency records that rely upon household income to determine eligibility. Student records often include information on guardianship, household income, and assistance benefits, and include criteria that overlap with the basis of eligibility determination shown in TABLE 3.15. Direct certification is a more desirable system, as it has the potential to reduce certification error rates by automating eligibility and providing an alternative to paper-based certification.

TABLE 3.16 *Percentage of SFAs with Integration With Other Online Systems for SFAs, Where the Primary Format of the Application for Free or Reduced-Price Meals is Web- or Computer-Based, SY 2013–14*

System	Percent	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>
Meals Claiming	86.5	1,011	177
Point-of-Sale	88.1	1,015	184
Student Records	70.0	959	169
Direct Certification	82.6	1,004	178
Other	2.8	335	58

<sup>1</sup> *n* is less than 1,598 as result of only surveying SFAs that use Web-based or computer-based school meal application.

**Note:** SFAs could select more than one system, so the percentages will not add up to 100 percent.

**Source:** SFA Director Survey SY 2013–14, question 3.6.

### 3.3.8 Source of Development of the Web- or Computer-Based Application System

TABLE 3.17 shows the sources that SFAs used to create their Web- or computer-based application systems. Most systems were created with the involvement of third-party vendors/contractors (82 percent), while 32 percent involved State CN information technology (IT) staff as sole or contributing developers. Non-IT State staff, district IT staff, and State IT staff from non-child nutrition agencies contributed to the development of 16 to 19 percent of all application systems used by SFAs, while non-IT district staff and other sources were involved in the development of 9 to 12 percent of the systems. SFAs were allowed to reply that a combination of developers were employed for their computer-based application systems, since schools in the same SFA district may use different developers.

TABLE 3.17 *Source of Development for the SFAs Where the Primary Format of the Application for Free or Reduced-Price Meals is a Web-Based or Computer-Based Application System, SY 2013–14*

Developer	Percent	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>
State Child Nutrition IT Staff	31.6	596	105
State IT Staff from Agencies Other than Child Nutrition	16.7	545	101
Other, Non-IT State Staff	15.8	594	103
District IT Staff	19.4	567	105
Other, Non-IT District Staff	8.7	533	100
Vendor or Contractor	82.2	876	168
Other	12.2	399	64

<sup>1</sup> *n* is less than 1,598 as result of only surveying SFAs that use Web-based or computer-based school meal application.

**Note:** SFAs could select more than one developer, so the percentages do not add up to 100 percent.

**Source:** SFA Director Survey SY 2013–14, question 3.7.

As the HHFKA continues to be implemented, monitoring the types of application systems used by SFAs may provide valuable information regarding best practices and standardization in developing Web- or computer-based application systems. Based on the scale of F/RP applications for some SFAs, pinpointing

the most efficient development sources will serve as a valuable tool to assess and reduce application error rates through alternatives to paper-based applications.

## 4 Special Assistance Alternatives and Charter Schools

Provision of access to nutritious meals, especially for children in need, is the cornerstone of CN programs. Two special school contexts may affect children’s access to the NSLP and the SBP meals: first, the use of Special Assistance Alternatives (Provisions 1, 2, and 3, or CEP) and second, charter schools. As noted earlier, challenges associated with the F/RP meal application process can be a major barrier to participation. A significant number of schools have large (and growing) proportions of students who are eligible for F/RP meals. In order to more efficiently reach low-income children, Special Assistance Alternatives are designed to improve access by reducing the administrative burden associated with determining eligibility. In charter schools, access to the NSLP and SBP may vary, because some schools may elect not to participate in the programs.

### 4.1 Special Assistance Alternatives

#### 4.1.1 Background

Generally, eligibility for F/RP meals is established through a paper application process or through direct certification. Under Provision 1, schools where at least 80 percent of enrolled students are eligible for F/RP meals may certify children eligible for free meals for up two consecutive years; however, other households must continue to submit applications to determine meal eligibility each school year. Provision 1 schools are not obligated to provide meals to all students at no charge and must continue to conduct daily meal counts. This provision has been available to school districts since 1980.

Provision 2 eliminates the minimum percentage of students eligible for F/RP meals and establishes a school’s claiming percentage determinations for a four-year period. However, schools must serve free school meals to all students. During the first or “base” year, schools use standard procedures for eligibility determinations and meal counting. In the following three years, schools serve free meals to all students without the need for any additional eligibility determinations. The school counts only the *total* number of reimbursable meals served each month and applies the percentages of free, reduced-price, and paid meals served during the corresponding month of the base year, to determine reimbursement. At the conclusion of the four-year period, the SA may approve a school’s request for an extension of Provision 2 provided that the local economic conditions around the school remain similar to those in the previous base year. In situations where this is not the case, schools wishing to continue operating under Provision 2 must establish a new base year. Expenses that are not covered by Provision 2 Federal funds must be paid using non-Federal sources. This provision has been available to school districts since 1980.

Provision 3 also uses the “base year” feature wherein schools make eligibility determinations and take meal counts by certification status, which determines the amount of Federal cash and commodity support to be received. Once a school is approved to receive Provision 3 funding, schools must serve all meals free of charge to all participating children for up to four subsequent years, during which time they are not required to make eligibility determinations or take meal counts. Reimbursements during the four years are based on the total dollar reimbursements that a school received during the base year and are adjusted to reflect inflation and changes in enrollment. Schools approved to operate under Provision 3 may be renewed for successive four-year periods if a district can establish that economic conditions in the school’s catchment area have not changed significantly since the base year. Similar to Provision 2,

any differences in expenses and Provision 3 Federal funding must be covered using funds from non-Federal sources. This provision has been available to school districts since 1995.<sup>24</sup>

CEP was authorized in the Healthy, Hunger Free Kids Act of 2010, and enables schools and SFAs in high poverty areas to provide free school meals to all students. The CEP eliminates the need to collect household applications to determine student eligibility to receive F/RP meals. It offers a different formula for reimbursing SFAs that depends on the percentage of *Identified Students* and a multiplier. The multiplier was 1.6 in SY 2013–14. Identified students are those who are directly certified for free meals on the basis of their participation in SNAP, TANF, and/or the Food Distribution Program on Indian Reservations (FDPIR). It also includes those who are homeless on the liaison list, who attend income-eligible Head Start or Pre-K Even Start programs, and runaway and migrant children. To be eligible, a school, group of schools, and/or school district must have an identified student percentage (ISP) of at least 40 percent as of April 1 of the year prior to participating in CEP. Eligible schools must also (1) pay, from sources other than Federal funds, the costs of serving breakfast and lunches that exceed the Federal assistance received, including Federal cash reimbursement; (2) not collect free and reduced-price applications from households in participating schools during the period of participation in CEP; (3) count total breakfasts and lunches served to students daily; (4) not be a residential child care institution (RCCI, as that term is set forth in the definition of “School” in 7 CFR 210.2), and (5) serve free breakfast and lunch to all students. As described in Chapter 3, CEP was phased in over a period of four years, beginning in SY 2011–12. In SY 2013–14, eleven States were authorized to implement CEP.<sup>25</sup>

In summary, the Special Assistance Alternatives and CEP reduce the administrative burden on schools, SFAs, and households by reducing traditional paper applications.<sup>26</sup> Therefore, it is important to estimate their prevalence in schools and SFAs. Additionally, with CEP becoming available nationwide in SY 2014–15, it is important to have baseline estimates of the use of the Special Assistance Alternatives to understand how CEP may change certification for F/RP school meals.

## 4.2 Research Question

This analysis addresses the following research question using data collected from State CN directors:

- How many SFAs and schools are operating under Provisions 1, 2, and 3 and CEP? How has this changed from SY 2011–12 to SY 2013–14?

---

<sup>24</sup> Descriptions of Provisions 1, 2, and 3 are based on information and links provided on FNS’s Web site: <http://www.fns.usda.gov/school-meals/provisions-1-2-and-3>.

<sup>25</sup> USDA, FNS. 2014. “SP 21-2014: Community Eligibility Provision: Guidance and Q&As.” Published February 25. <http://www.fns.usda.gov/sites/default/files/SP21-2014os.pdf>.

<sup>26</sup> Research on the accuracy of school meal program reimbursements has indicated that improper payment rates are substantially lower in schools using CEP and direct certification, compared to schools that use household applications. See USDA, FNS. 2015. “Program Error in the National School Lunch Program and School Breakfast Program: Findings from the Second Access, Participation, Eligibility and Certification Study (APEC II).” Published May. <http://www.fns.usda.gov/sites/default/files/ops/APECII-Vol1.pdf>.

### 4.3 Results

TABLE 4.1 shows the number and percentage of States that had SFAs operating the NSLP and the SBP under the various provisions in SY 2013–14, as reported by State CN directors. Because schools may elect to operate under Provision 1, 2, or 3 for the NSLP, the SBP, or both, a given State can have SFAs operating under all of the available provisions and, therefore, be included in all rows of TABLE 4.1.<sup>27</sup>

TABLE 4.1 *The Number and Percentage of States That had SFAs With Schools Operating Under Provisions 1, 2, 3, or CEP, as Reported by State CN Directors, SY 2013–14*

States with SFAs that have at least one school operating a special provision for:	Provision 1 (n=47) <sup>1</sup>		Provision 2 (n=53) <sup>1</sup>		Provision 3 (n=49) <sup>1</sup>		Community Eligibility Provision (n=11) <sup>2</sup>	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
NSLP only	1	2.1	8	15.1	2	4.1	N/A	N/A
SBP only	1	2.1	23	43.4	0	0.0	N/A	N/A
Both NSLP and SBP	3	6.4	36	67.9	13	26.5	11	100
Total number of States	3	6.4	40	75.5	13	26.5	11	100

<sup>1</sup> n is less than 55 States due to item nonresponse.

<sup>2</sup> Eleven States were approved to implement CEP in SY 2013–14.

**Note:** “N/A” denotes not applicable—schools operating under CEP must apply the rules to both the NSLP and the SBP.

**Source:** State CN Director Survey SY 2013–14, question C1.

In SY 2013–14, Provision 2 was used most extensively; 76 percent of States reported that they had one or more SFAs with schools operating under Provision 2, and 68 percent had SFAs with schools that operated under Provision 2 for both the NSLP and SBP. During the year of data collection, SY 2013–14, all 11 of the States where CEP was available reported that some of their SFAs had schools operating under CEP. Provision 1 was the least common, with only three States reporting they had SFAs with schools operating under this provision. Appendix TABLE D.4 through TABLE D.9 present the number and percentage of SFAs and schools that operated under each type of provision in SY 2013–14, by State, program, and/or combination of programs.

Although many States had at least one SFA and school operating under Provisions 1, 2, 3, and/or CEP, the total number of SFAs and schools operating under these provisions nationwide is relatively small.<sup>28</sup>

TABLE 4.2 presents the number and percentage of SFAs that had schools operating the NSLP and/or the SBP under one of the provisions, as well as the number and percentage of schools. For both SFAs and

<sup>27</sup> Schools operating under CEP must implement both the NSLP and the SBP.

<sup>28</sup> According to The Condition of Education 2013, Table 116, for SY 2010–11, 21.3 percent of public schools had more than 75 percent of their students eligible for free or reduced-price lunches. See National Center for Educational Statistics. 2012. “Table 116. Number and percentage distribution of public elementary and secondary students and schools, by traditional or charter school status and selected characteristics: Selected years, 1999–2000 through 2010–11.” Table prepared in October. [http://nces.ed.gov/programs/digest/d12/tables/dt12\\_116.asp](http://nces.ed.gov/programs/digest/d12/tables/dt12_116.asp).

schools, the most common provisions during SY 2013–14 were Provision 2 (6 percent of SFAs and 5 percent of schools) and CEP (4 percent of both SFAs and schools). Nationwide, less than 1 percent of SFAs and schools operated under Provision 1 or Provision 3. Schools that operated under Provision 2 were roughly equally split between using the provision only for the SBP and for both the SBP and the NSLP.

TABLE 4.2 *The Number and Percentage of SFAs and Schools That Operated Under Provisions 1, 2, 3, or CEP, as Reported by State CN Directors, SY 2013–14*

State Directors Reporting (n=55)	Provision 1		Provision 2		Provision 3		Community Eligibility Provision	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
<b>SFAs with at least one school operating</b>								
NSLP only <sup>1</sup>	7	<0.1	22	0.1	2	<0.1	0	0.0
SBP only <sup>1</sup>	1	<0.1	240	1.3	0	0.0	0	0.0
Both NSLP and SBP	59	0.3	815	4.3	56	0.3	732	3.9
Total SFAs	67	0.4	1,077	5.7	58	0.3	732	3.9
<b>Schools operating</b>								
NSLP only	7	<0.1	53	0.1	11	<0.1	0	0.0
SBP only	1	<0.1	2,321	2.3	0	0.0	0	0.0
Both NSLP and SBP	443	0.4	2,934	2.9	296	0.3	4,014	4.0
Total schools	451	0.4	5,308	5.3	307	0.3	4,014	4.0

<sup>1</sup>Schools that participate in “SBP only” or “NSLP only” do not have the option to participate in CEP.

**Note:** Massachusetts, one of the States implementing CEP in SY 2013–2014, did not report the number of SFAs operating under the provision. This information was obtained from the State Web site at <http://www.doe.mass.edu/news/news.aspx?id=10196>.

**Source:** State CN Director Survey SY 2013–14, questions C1 and C2.

Consistent with the expansion of CEP from seven States in SY 2012–13 to eleven in SY 2013–14, the number of SFAs operating under this provision increased from 437 in SY 2012–13 to 732 in SY 2013–14, an increase of 68 percent (TABLE 4.3).<sup>29</sup> The number of SFAs with schools participating in CEP increased by 50 percent, from 2,668 to 4,014. Not surprisingly, given the expansion of CEP, the number and

<sup>29</sup> Three States were operating under CEP in SY 2011–12, but the CN Director Survey implemented for that school year did not collect information on the number of SFAs or schools using CEP.

percentage of SFAs and schools operating under Provision 2 decreased slightly over this time period (after increasing between SY 2011–12 and SY 2012–13).

TABLE 4.3 *The Number and Percentage of SFAs and Schools That Operated Under Provisions 1, 2, 3, or CEP, as Reported by State CN Directors for SY 2011–12, SY 2012–13, and SY 2013–14*

Provision	SFAs						Schools					
	SY 2011–12		SY 2012–13		SY 2013–14		SY 2011–12		SY 2012–13		SY 2013–14	
	Number	Percent										
Provision 1 <sup>1</sup>	N/A	N/A	6	<0.1	67	0.4	N/A	N/A	71	0.1	451	0.4
Provision 2 <sup>2</sup>	1,097	5.8	1,267	6.7	1,077	5.7	6,922	6.9	9,067	9.1	5,309	5.3
Provision 3 <sup>3</sup>	69	0.4	83	0.4	58	0.3	254	0.3	266	0.3	307	0.3
Community Eligibility Provision <sup>4</sup>	N/A	N/A	437	2.3	732	3.9	N/A	N/A	2,668	2.7	4,014	4.0

<sup>1</sup> (SY 2011–12  $n=0$ ; SY 2012–13  $n=53$  of 54; SY 2013–14  $n=47$  of 55).

<sup>2</sup> (SY 2011–12  $n=54$ ; SY 2012–13  $n=54$ ; SY 2013–14  $n=53$  of 55).

<sup>3</sup> (SY 2011–12  $n=53$ ; SY 2012–13  $n=53$  of 54; SY 2013–14  $n=49$  of 55).

<sup>4</sup> (SY 2011–12  $n=N/A$ ; SY 2012–13  $n=7$ ; SY 2013–14  $n=11$  of 55).

**Notes:** “N/A” denotes not applicable—this information was not collected in the SY 2011–12 version of the survey. In the SY 2013–14 survey, Massachusetts did not report the number of SFAs operating under CEP. This information was obtained from the State Web site at <http://www.doe.mass.edu/news/news.aspx?id=10196>.

**Source:** State CN Director Survey SY 2011–12, questions D1 and D2; State CN Director Survey SY 2012–13, questions C1 and C2; State CN Director Survey SY 2013–14, questions C1 and C2.

TABLE 4.4 provides information about the use of Provision 2 and CEP in States that were approved to implement CEP in SY 2012–13 or SY 2013–14. The table shows the number and percentage of SFAs and schools that used these two provisions in both SY 2012–13 and SY 2013–14. The two bottom rows in the table show SY 2013–14 totals for (1) the seven States that implemented CEP in both school years and (2) all States that implemented CEP in SY 2013–14. Across the seven States that were approved to implement CEP in both school years, there was a modest 5 percent decrease from SY 2012–13 to SY 2013–14 in the number of SFAs that implemented Provision 2 (from 155 to 147). The associated 17 percent decrease in the number of schools (from 724 to 603) implementing Provision 2 was mainly attributable to decreases in New York (from 499 to 424) and Ohio (from 38 to 22). It should be noted that the use of Provision 2 in these States had already decreased substantially—by 12 percent among SFAs and 40 percent among schools between SY 2011–12 and SY 2012–13 (data not shown).

Across the seven States that implemented CEP in both school years, the number of SFAs operating under CEP remained constant from SY 2012–13 to SY 2013–14 (437 SFAs). The number of schools reported as operating under CEP decreased from 2,668 to 2,503. As described previously, with the addition of four new States in SY 2013–14, the total number of SFAs implementing CEP increased from 437 to 732 (a 68 percent increase) and the total number of schools increased from 2,668 to 4,014 (50 percent increase). Use of CEP by SFAs in SY 2013–14 was highest in Kentucky (55 percent of all SFAs in Kentucky) and in West Virginia and the District of Columbia (53 percent each). Use of CEP by schools was highest in the District of Columbia (53 percent) and West Virginia (48 percent).

An increase in the implementation of CEP by both schools and SFAs occurred between SY 2012–13 and SY 2013–14. However, the decrease in the number of schools operating under CEP (2,668 to 2,503) in States authorized to use CEP in both years should be further examined to understand why some schools did not continue the provision. Nonetheless, schools and SFAs continue to exhibit a shift towards provisions intended to reduce paper-based applications and improve certification accuracy. More results and information will be available as SFA and school information is provided from SY 2014–15, the school year that CEP became nationally available to all schools.

TABLE 4.4 *Among States Participating in CEP, the Number and Percentage of SFAs and Schools Operating Under Provision 2 and Community Eligibility Provision, as Reported by State CN Directors, SY 2012–13 and SY 2013–14*

	Number of SFAs	Number of schools	Provision 2				CEP				
			SFA		School		SFA		School		
			Number	Percent	Number	Percent	Number	Percent	Number	Percent	
<b>SY 2012–13</b>											
DC	61	230	1	1.6	4	1.7	23	37.7	123	53.5	
Illinois	1,132	4,276	3	0.3	27	0.6	60	5.3	478	11.2	
Kentucky	189	1,439	4	2.1	38	2.6	52	27.5	267	18.6	
Michigan	882	3,538	0	0.0	0	0.0	116	13.2	546	15.4	
New York	1,105	6,100	109	9.9	499	8.2	73	6.6	667	10.9	
Ohio	1,222	3,831	38	3.1	156	4.1	78	6.4	304	7.9	
West Virginia	73	766	0	0.0	0	0.0	35	47.9	283	37.0	
<b>Total</b>	<b>4,664</b>	<b>20,180</b>	<b>155</b>	<b>3.3</b>	<b>724</b>	<b>3.6</b>	<b>437</b>	<b>9.4</b>	<b>2,668</b>	<b>13.2</b>	
<b>SY 2013–14</b>											
DC	61	230	0	0.0	0	0.0	32	52.5	122	53	
Illinois	1,132	4,289	3	0.3	27	0.6	100	8.8	696	16.2	
Kentucky	189	1,547	0	0.0	22	1.4	103	54.5	103	6.7	
Michigan	882	3,524	0	0.0	0	0.0	156	17.7	549	15.6	
New York	1,105	5,592	113	10.2	424	7.6	86	7.8	830	14.8	
Ohio	1,222	3,765	35	2.9	130	3.5	129	10.6	423	11.2	
West Virginia	73	716	0	0.0	0	0.0	39	53.4	345	48.2	
Florida <sup>1</sup>	223	3,476	23	10.3	470	13.5	34	15.2	378	10.9	
Georgia <sup>1</sup>	232	2,332	49	21.1	114	4.9	50	21.6	437	18.7	
Maryland <sup>1</sup>	73	1,558	1	1.4	193	12.4	2	2.7	6	0.4	
Massachusetts <sup>1</sup>	429	1,995	N/A	N/A	277	13.9	1	0.2	125	6.3	
<b>Total for States Implementing Both Years</b>	<b>4,664</b>	<b>19,542</b>	<b>147</b>	<b>3.2</b>	<b>603</b>	<b>3.1</b>	<b>437</b>	<b>9.4</b>	<b>2,503</b>	<b>12.8</b>	
<b>Total for All States Implementing in SY 2013–14</b>	<b>5,621</b>	<b>29,024</b>	<b>224</b>	<b>4.0</b>	<b>1,657</b>	<b>5.7</b>	<b>732</b>	<b>13.0</b>	<b>4,014</b>	<b>13.8</b>	

<sup>1</sup> These States began implementing CEP in SY 2013–14.

Source: State CN Director Survey SY 2012–13, questions C1 and C2; State CN Director Survey SY 2013–14, questions C1 and C2.

## 4.4 Charter Schools

### 4.4.1 Background

Charter schools are often operated independently from the school districts in areas where they are located and are exempt from many State and local rules that govern other public schools. Charter schools may elect not to participate in the NSLP and/or the SBP, even if State law requires that all public schools participate in the programs. For example, in SY 2012–13, 6 percent of charter schools in Pennsylvania did not participate in the NSLP, and 19 percent did not participate in the SBP.<sup>30</sup> This raises concerns that low-income students attending charter schools may not have access to nutritious F/RP meals.

States vary in how they manage charter schools that participate in Federal school meal programs. For example, States may grant SFA status to charter schools or facilitate their integration into the larger SFA. These practices may have implications for the future size of SFAs and could lead to an increase in the number of very small SFAs, which could ultimately affect efficiency, training, and oversight.

## 4.5 Research Questions

This analysis addressed the following research questions using data collected from State CN directors:

- What proportion of States have charter schools, and what is the level of participation among charter schools in the NSLP and the SBP in States that do have charter schools?
- How many charter schools are participating in the SBP and/or the NSLP nationwide?
- To what extent do States permit charter schools that participate in the NSLP or the SBP to operate as a separate SFA, as part of an existing SFA, or allow charters to choose either option?

## 4.6 Results

According to State CN directors, 28 percent of States had no charter schools in SY 2013–14,<sup>31</sup> 35 percent had 20-100 charter schools, and 24 percent had more than 100 charter schools (TABLE 4.5). The remaining 13 percent of States had fewer than 20 charter schools. This distribution is comparable to what State CN directors reported for SY 2012–13.<sup>32</sup>

---

<sup>30</sup> Community Legal Services of Philadelphia. 2013. "Recommended Meals Policy for Charter Schools." Published August 8. <http://clsphila.org/news/meals-policy-charter-schools>.

<sup>31</sup> The number of States with no charter schools, which is based on reports from State CN Directors, differs from other sources of information. For example, according to the Web site for the National Alliance for Public Charter Schools, for SY 2012–13, only nine States did not have charter schools. See National Alliance for Public Charter Schools. N.D. "Total Number of Schools." Accessed September 29, 2015. <http://dashboard.publiccharters.org/dashboard/schools/page/overview/state/WA/year/2013>.

<sup>32</sup> In SY 2013–14, 64 percent of all charter schools were concentrated in the seven States that had 200 or more charter schools.

TABLE 4.5 *Presence of Charter Schools, SY 2012–13 and SY 2013–14*

Number of Charter Schools in State	SY 2012–13 (n=53) <sup>1</sup>		SY 2013–14 (n=54) <sup>2</sup>	
	Number	Percent	Number	Percent
None	15	28.3	15	27.8
Fewer than 20	7	13.2	7	13.0
20 to 100	18	34.0	19	35.2
More than 100	13	24.5	13	24.0

<sup>1</sup> n is less than 54 due to item nonresponse.

<sup>2</sup> n is less than 55 due to item nonresponse.

**Source:** State CN Director Survey SY 2012–13, questions C4, C4a, C4b and C4c. State CN Director Survey SY 2013–14, questions C3, C3a, C3b, and C3c.

TABLE 4.6 shows the number and percentage of charter schools that participated in the NSLP and the SBP in SY 2012–13 and SY 2013–14. Comparisons across years are complicated by differences in both the total number of SFAs that responded to relevant questions and the set of SFAs that responded to relevant questions each year. However, it is clear that the percentage of charter schools participating in the NSLP and/or the SBP increased substantially from SY 2012–13 to SY 2013–14. Appendix TABLE D.2 provides the total number of charter schools and the number of charter schools participating in NSLP and SBP for each State for both years. Appendix TABLE D.3 provides the number of charter schools operating in each State, and charter school participation in the NSLP and the SBP for SY 2013–14.

TABLE 4.6 also summarizes data on how State CN directors described the operations of charter schools (in regard to SFA-level functions) that participated in the NSLP or the SBP. Comparisons over time are again complicated by shifts in the number and group of SFAs that responded to the relevant questions. The available data suggest, however, that most charter schools tend to operate as independent SFAs. It is curious that the “Not Reported” figures for SY 2012–13 are so high. Perhaps this is indicative of the dynamic environment created by the surge in charter schools, which have more than doubled in number over the last decade.<sup>33</sup>

<sup>33</sup> National Alliance for Public Charter Schools. 2014. “Charter School Enrollment Up 13 Percent This Year.” Published February 12. <http://www.publiccharters.org/press/charter-school-enrollment-13-percent-year/>.

TABLE 4.6 *Among States With Charter Schools, the Percentage of Charter Schools That Participated in the NSLP and the SBP and Whether They Operated as a Separate SFA, SY 2011–12, SY 2012–13, and SY 2013–14*

Charter Schools That:	SY 2012–13		SY 2013–14	
	Number	Percent	Number	Percent
Participated in the NSLP	3,202	59.5	3,852	84.9
Participated in the SBP	2,723	50.6	3,395	74.8
Did Not Participate in the NSLP or the SBP	661	12.3	547	12.1
Operated as a Separate SFA	2,324	43.2	2,630	57.9
Operated as Part of a Larger SFA	1,172	21.8	1,252	27.6
Not Reported	359	6.7	3	0.1
Number of States Reporting	<sup>a</sup> 38		<sup>a</sup> 39	

<sup>a</sup> *n* is determined by multi-tiered answers to survey questions.

**Source:** State CN Director Survey SY 2012–13, questions C4, C4a, C4b, and C4c; CN Director Survey, SY 2013–14, questions C3 and C3a-C3c.

## 5 Updated Meal Requirements

### 5.1 Background

The Healthy, Hunger-Free Kids Act of 2010 reauthorized the NSLP and the SBP with a focus on improving children’s access to healthy foods and promoting healthy eating and physical activity across the entire school environment. The HHFKA directed USDA to reform requirements for school meals to ensure that the meals children receive at school are consistent with the latest *Dietary Guidelines for Americans*.<sup>34</sup> Regulations to implement this provision became effective in SY 2012-13.

Summarized in TABLE 5.1, the updated meal requirements address both meal patterns (the types and amounts of food that must be offered) and nutrient content (calories, saturated fat, sodium, and *trans* fat), and are specified for three grade levels (K–5, 6–8, and 9–12). The updated requirements increase the amounts of fruits and vegetables offered per day, ensure a greater variety of vegetables across a school week, increase the availability of whole grains, restrict milk offerings to flavored or unflavored nonfat milk and 1 percent unflavored milk, and limit weekly amounts of juice and grain-based desserts. The updated standards for nutrient content define minimum and maximum calorie levels, as well as limits on saturated fat,<sup>35</sup> sodium, and *trans* fat.

The final rule, issued in 2012, called for the updated meal requirements to be phased in over time (TABLE 5.2). The implementation of most requirements in the NSLP began in SY 2012–13, and most requirements for the SBP were gradually phased in, starting in SY 2013–14. At the time the updated meal requirements for grains were first implemented, at least half of the grains offered during a school week were required to be whole grain-rich. By SY 2014–15, all grains were required to be whole grain-rich at both breakfast and lunch. The updated sodium standard is being phased in gradually over 10 years, with intermediate sodium targets effective in SY 2014–15 and SY 2017–18, and the final target (shown in TABLE 5.1) in SY 2022–23. The data presented in this chapter were collected between May and November 2014, a year after lunch requirements were implemented and shortly after the implementation of updated breakfast requirements.

TABLE 5.1 Updated Meal Requirements for the NSLP and the SBP

Meal Pattern Requirements	Breakfast			Lunch		
	Grades K–5	Grades 6–8	Grades 9–12	Grades K–5	Grades 6–8	Grades 9–12
	<b>Amount of Food per Week (Minimum per Day)</b>					
Fruits (cups) <sup>1,2</sup>	5 (1)	5 (1)	5(1)	2.5 (0.5)	2.5 (0.5)	5 (1)
Vegetables (cups) <sup>1,2</sup>	0	0	0	3.75 (0.75)	3.75 (0.75)	5 (1)
Dark Green	0	0	0	0.5	0.5	0.5
Red/Orange	0	0	0	0.75	0.75	1.25
Beans/Peas (Legumes)	0	0	0	0.5	0.5	0.5

<sup>34</sup> USDA and HHS. 2016. “Dietary Guidelines.” Last modified January 29. <http://health.gov/dietaryguidelines>.

<sup>35</sup> The standard for saturated fat (less than 10 percent of calories from saturated fat) was in place prior to the HHFKA.

	Breakfast			Lunch		
	Grades K–5	Grades 6–8	Grades 9–12	Grades K–5	Grades 6–8	Grades 9–12
Starchy	0	0	0	0.5	0.5	0.5
Other <sup>3</sup>	0	0	0	0.5	0.5	0.75
Additional Vegetable to Reach Total <sup>4</sup>	0	0	0	1.0	1.0	1.5
Grains (oz. eq.) <sup>5,6</sup>	7–10 (1)	8–10 (1)	9–10 (1)	8–9 (1)	8–10 (1)	10–12 (2)
Meats/Meat Alternates (oz. eq.) <sup>6,7</sup>	0	0	0	8–10 (1)	9–10 (1)	10–12 (2)
Fluid Milk (cups) <sup>8</sup>	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
<b>Nutrient Standards</b>	<b>Daily Amount Based on the Average for a 5-Day Week</b>					
Calorie Range (min-max) (kcal) <sup>9</sup>	350– 500	400–550	450–600	550–650	600–700	750–850
Saturated Fat ( percent of total calories) <sup>9</sup>	<10	<10	<10	<10	<10	<10
Sodium (mg) <sup>9,10</sup>						
Target 1 (SY 2014–15)	≤540	≤600	≤640	≤1,230	≤1,360	≤1,420
Target 2 (SY 2017–18)	≤485	≤535	≤570	≤935	≤1,035	≤1,080
Final target (SY 2022–23)	≤430	≤470	≤500	≤640	≤710	≤740
<i>Trans Fat</i> <sup>9</sup>	Nutrition label or manufacturer’s specifications indicate zero grams per serving					

<sup>1</sup> No more than half of the fruit or vegetable offerings may be in the form of juice. All juice must be 100 percent full-strength.

<sup>2</sup> For breakfast, vegetables may be substituted for fruits, but the first two cups per week of any such substitution must be from the dark green, red/orange, beans and peas (legumes), or “Other vegetables” subgroups, as defined in CFR § 210.10(c)(2)(iii).

<sup>3</sup> This category comprises “Other vegetables” as defined in CFR § 210.10(c)(2)(iii)(E). For the purposes of the NSLP, the “Other vegetables” requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups, as defined in CFR § 210.10(c)(2)(iii).

<sup>4</sup> Any vegetable subgroup may be offered to meet the total weekly vegetable requirement.

<sup>5</sup> The implementation timeline (see TABLE 5.2) specified dates for when half and all of the grains offered must be whole grain-rich.

<sup>6</sup> For grains and meat/meat alternates, the ranges specified for weekly amounts are suggested targets. Schools must provide the minimum amount per week, but have the flexibility to exceed the maximum by serving larger portions of lean proteins and whole grains.

<sup>7</sup> There is no separate meat/meat alternate component in the SBP. For SBP meals, schools may substitute 1 oz. eq. of meat/meat alternate for 1 oz. eq. of grains after the minimum daily grains requirement is met.

<sup>8</sup> Fluid milk must be low-fat (1 percent, unflavored) or fat-free (unflavored or flavored).

<sup>9</sup> Discretionary sources of calories (solid fats and added sugars) may be added to the meal pattern if within the specifications for calories, saturated fat, *trans* fat, and sodium. Foods of minimal nutritional value and fluid milk with fat content greater than 1 percent are not allowed.

<sup>10</sup> Target 2 and the final target will be required only after USDA evaluates relevant data on sodium intake and human health, as required by Section 743 of the FY 2012 Agriculture Appropriations Act.

TABLE 5.2 *Implementation Timeline for Updated Meal Pattern Requirements*

Updated Requirements	Implementation for NSLP (L) and SBP (B)				
	SY 2012–13	SY 2013–14	SY 2014–15	SY 2017–18	SY 2022–23
<b>Meal Pattern Requirements</b>					
Fruits	L		B		
Vegetables	L				
Grains					
Half of All Grains Must be Whole Grain-Rich	L	B			
All Grains Must be Whole Grain-Rich			L, B		
Meats/Meat Alternates <sup>1</sup>	L				
<b>Nutrient Standards</b>					
Calories	L	B			
Saturated Fat <sup>2</sup>	L, B				
Sodium <sup>3</sup>					
Target 1			L, B		
Target 2				L, B	
Final Target					L, B
Trans Fat	L	B			

<sup>1</sup>The meal pattern for breakfast does not include meats/meat alternates.

<sup>2</sup>The updated meal pattern requirements did not change the existing standard for saturated fat.

<sup>3</sup>Target 2 and the final target will be required only after USDA evaluates relevant data on sodium intake and human health, as required by Section 743 of the FY 2012 Agriculture Appropriations Act.

**Note:** Requirements in SY 2012–13 and SY 2013–14 were in effect at the time the data summarized in this chapter were collected.

In addition to updated meal requirements, the HHFKA granted FNS the authority to begin providing an additional 6 cents per lunch reimbursement to SFAs that are certified to be in compliance with the updated meal requirements for both breakfast and lunch. FNS changed the offer-versus-serve (OVS) provision, which has been available to schools for many years and allows students to refuse one or more of the meal components that schools must offer based on the meal pattern requirements. Under the updated OVS rules, students must take at least one half-cup of fruits and/or vegetables in order for their meal (breakfast or lunch) to be reimbursable. Previously, no rules specified which foods students were required to take.<sup>36</sup>

Some SFAs reported that schools encountered challenges when implementing the updated meal requirements and related changes in school meal operations. For example, some schools found planning and serving meals that meet all of the updated requirements very challenging because of limited product availability, higher food costs, or low student acceptance (FIGURE 5.1). Such challenges could potentially affect student participation, program costs and revenues, and plate waste. To the extent possible, FNS has offered some policy flexibility in response to operator concerns. For instance, FNS

<sup>36</sup> In the NSLP, OVS is mandatory for high schools and optional for lower grades. In the SBP, OVS is optional for all grades.

eliminated an initial weekly quantity limit for grains and meats/meat alternates<sup>37</sup> and is permitting SFAs to grant temporary exemptions from the 100 percent whole grain-rich requirement if an SFA demonstrates hardship in procuring compliant products that are acceptable to students.<sup>38</sup>

FNS is interested in understanding the strategies SFAs are using to implement the updated meal requirements and the challenges SFAs have encountered. The findings presented in this chapter provide a picture of the status of implementation one year after the lunch requirements took effect, and explore the initial implementation of the breakfast requirements. When possible, current findings are compared to the SY 2012–13 SN-OPS study, which collected data during the initial implementation of the lunch requirements.

## 5.2 Research Questions

This analysis addressed the following research questions, within the domains listed below:

- **Certification for Additional 6-Cents Reimbursement**
  - What proportion of SFAs submitted certification materials for the additional 6 cents per lunch reimbursement? What are the reasons for not submitting certification materials?
- **Implementation Assistance**
  - What proportion of SFAs use the USDA sharing Web site to assist with menu changes?
- **Use of USDA Foods**
  - What proportion of SFAs changed the type and/or amount of USDA Foods in order to meet the updated meal pattern requirements?
- **General Challenges Associated with Implementing the Updated Meal Requirements**
  - To what extent did SFAs face challenges in implementing the updated meal pattern requirements in SY 2013–14?
- **Breakfast Requirements**
  - What percentage of SFAs faced challenges in implementing the updated meal pattern requirements for breakfast?
- **Whole Grain-Rich Requirements**
  - To what extent did SFAs face challenges in implementing the 50 percent whole grain-rich requirements for breakfast or lunch?
  - What practices did SFAs use to meet the 50 percent whole grain-rich requirement for breakfast and lunch?
  - What challenges do SFAs anticipate facing in implementing the 100 percent whole grain-rich requirement for breakfast and/or lunch in SY 2014–15?
- **Fruit and Vegetable Requirements for Lunch**

---

<sup>37</sup> USDA, FNS. 2014. "Certification of Compliance with Meal Requirements for the National School Lunch Program under the Healthy, Hunger-Free Kids Act of 2010." *Federal Register*. Published January 3. <https://www.federalregister.gov/articles/2014/01/03/2013-31433/certification-of-compliance-with-meal-requirements-for-the-national-school-lunch-program-under-the>.

<sup>38</sup> USDA, FNS. 2015. "SP20-2015: Request for Exemption from the School Meals' Whole Grain-Rich Requirement for School Years 2014-2015 and 2015-2016." Published February 10. <http://www.fns.usda.gov/sites/default/files/cnd/SP20-2015os.pdf>.

- How have SFAs changed the types of fruits and vegetables offered in lunches since implementing the updated meal requirements?
- What proportion of SFAs experienced difficulties purchasing vegetables in the five required subgroups?
- What were the reasons SFAs experienced difficulties with purchasing specific types of vegetables?
- **Calorie Requirements**
  - What proportion of SFAs face challenges in meeting the calorie standards for breakfast and lunch? Do the calorie minimums or maximums pose more of a challenge?
  - What proportion of SFAs made adjustments to meet students' needs/wants for additional foods? What types of adjustments have SFAs made?
- **Sodium Requirements**
  - What proportion of SFAs know the sodium content of their meals? Among SFAs that know sodium contents, what is the average sodium content of breakfasts? Lunches?
  - What practices do SFAs anticipate using to meet the sodium target for SY 2014–15?
- **Plate Waste**
  - How has plate waste changed at lunch since the implementation of the updated meal pattern requirements?
  - What are the reasons for observed plate waste?

## 5.3 Results

### 5.3.1 General Implementation of the Updated Meal Requirements

#### *Certification for Additional 6-Cents Reimbursement*

To be eligible for Federal reimbursement, meals served in the NSLP and the SBP have always been required to meet defined standards. Under the HHFKA, SFAs certified as compliant with the updated meal requirements for both breakfast and lunch are eligible to receive an additional 6-cents reimbursement for each lunch served. SFAs must submit initial certification materials in order to qualify for the additional reimbursement. There are several options SFAs can select to become certified, but in general, to apply for certification, SFAs must submit a 1-week menu for each grade level, menu certification worksheets for each menu, and a nutrient analysis or simplified nutrient assessment for each menu certification worksheet.<sup>39</sup>

The 6-cents reimbursement certification became available to SFAs on July 1, 2012. During the second year of the SN-OPS series (SY 2012–13), SFAs were asked whether they had submitted certification materials for the 6-cents reimbursement and whether they had been certified. In SY 2012–13, 91 percent of SFAs had submitted paperwork, of whom 93 percent were certified to receive an additional 6-cents reimbursement. In SY 2013–14, the SN-OPS survey again asked SFAs whether or not they had

<sup>39</sup> USDA, FNS. 2014. "SP34-2012 (v.3): School Year 2014–15 Certification of Compliance with New Meal Patterns: Certification Tools and Prototype Attestation - Revised." Published September 24. <http://www.fns.usda.gov/sy-2014-15-certification-compliance-new-meal-patterns-certification-tools-and-prototype-attestation>.

been certified for the 6-cents reimbursement, and if not, whether they had submitted certification materials. Of the SFAs surveyed in SY 2013–14, 97 percent of SFAs reported that they were certified to receive the additional 6-cents reimbursement (data not shown). Among the 3 percent of SFAs that were not certified (a total of 54 SFAs), 33 SFAs revealed that they had not submitted certification materials. The most common reasons cited for not submitting certification materials (respondents could cite more than one reason) were inadequate training to complete the application process (28 percent), limited staff resources (28 percent), and paperwork burden (21 percent). Respondents in 21 percent of the 33 SFAs did not know why certification materials had not been submitted (TABLE 5.3).

TABLE 5.3 *Reasons Cited by SFAs for Not Submitting Certification Materials for the Additional 6-Cents Reimbursement, SY 2013–14*

Reasons	Percent
Not Enough Training to Complete the Application Process	28.4
Limited Staff Resources	27.7
Not Aware/Don't Know	21.2
Paper Work Burden	20.8
Limited Technical Resources (e.g., Computer, Internet, Software)	12.2
Costs of Implementation Are Too High	11.5
Other	28.3
Wgtd <i>n</i>	<b>434</b>
Unwgtd <i>n</i>	<sup>a</sup> <b>32</b>

<sup>a</sup> *n* is less than 33 due to item nonresponse.

**Note:** A total of 54 SFAs were not certified to receive the additional 6-cents reimbursement in SY 2013–14. Of these, 33 had not submitted certification materials.

**Source:** SFA Director Survey, SY 2013–14, question 5.23b.

### *Implementation Assistance*

To help SFAs develop menus that are consistent with the updated meal requirements, FNS developed the online Best Practices Sharing Center (<http://healthymeals.nal.usda.gov/best-practices>). The intent of the Web site is to allow SFAs and SAs to share the resources and tools they use to develop menus that meet the updated meal requirements. Users can select from a number of topics (for example, fruits, vegetables, sodium reduction, or planning tools) and also search for materials in specific formats (for example, menus, recipes, training materials, or handouts).

In SY 2013–14, about one-quarter of SFAs (26 percent) used USDA's Best Practices Sharing Center to assist with menu changes (TABLE 5.4). The proportion of SFAs using the Best Practices Sharing Center differed significantly by SFA size and urbanicity, although in an unexpected fashion. The large SFAs (those with 5,000 to 24,999 students) used the Web site at a higher rate than the other SFAs, and SFAs located in towns used the site more frequently than the SFAs in other locations.

TABLE 5.4 *Percentage of SFAs Using the USDA Best Practices Sharing Center Web Site to Assist With Menu Changes, by SFA Characteristics, SY 2013–14*

SFA Characteristics	Percent	Total SFAs	
		Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>
All SFAs	26.1	14,849	1,572
<b>SFA size<sup>2</sup></b>			
Small (1–999)	24.3	7,710	373
Medium (1,000–4,999)	27.9	5,215	598
Large (5,000–24,999)	29.1	1,633	409
Very Large (25,000+)	23.4	291	192
<b>Urbanicity<sup>3</sup></b>			
City	24.5	1,373	265
Suburban	27.3	2,700	427
Town	29.8	2,632	284
Rural	25.6	7,106	536
<b>Poverty Level</b>			
Low (0–29 percent F/RP)	18.3	3,084	355
Medium (30–59 percent F/RP)	30.6	6,755	715
High (60 percent or more F/RP)	24.8	5,010	502

<sup>1</sup> *n* is less than 1,598 due to item nonresponse.

<sup>2</sup> Percentage of SFAs using the USDA Web site to assist with menu changes differed significantly by SFA size.

<sup>3</sup> Percentage of SFAs using the USDA Web site to assist with menu changes differed significantly by poverty status.

**Source:** SFA Director Survey SY 2013–14, question 5.22.

### *Use of USDA Foods*

In addition to providing cash subsidies for reimbursable meals that meet requirements, USDA supports school meal programs as well as American agricultural producers by purchasing nutritious agricultural products and making them available to SFAs. SFAs receive a prescribed amount (cash value) of “entitlement” USDA Foods based on the number of reimbursable lunches served in the prior school year. SFAs may also receive “bonus” USDA Foods (as they are available) through USDA’s price support and surplus removal programs. In recent years, USDA has made changes to the types of USDA Foods that are available to SFAs to better support the updated meal requirements.<sup>40</sup> For example, a wide variety of fruits, vegetables, and whole grain-rich items are offered as USDA Foods. In addition, low-sodium and low fat products are also available as USDA Foods, including low-sodium canned vegetables, lower fat cheeses, and lean meats.

In SY 2013–14, 71 percent of SFAs reported changing the types and amounts of USDA Foods they ordered as a means of meeting the updated meal requirements (TABLE 5.5). This is generally consistent with results for SY 2012–13 and, in fact, there were no significant differences between the two years’

<sup>40</sup> USDA, FNS. 2014. “How USDA Foods Support the National School Lunch and School Breakfast Program Meal Pattern Requirements.” Published April. [http://www.fns.usda.gov/sites/default/files/Meal\\_Pattern\\_USDA\\_Foods\\_Chart\\_Revised\\_4\\_28\\_14.pdf](http://www.fns.usda.gov/sites/default/files/Meal_Pattern_USDA_Foods_Chart_Revised_4_28_14.pdf).

findings. Within the school years, however, the proportion of SFAs that changed the types and amounts of USDA Foods ordered differs significantly by urbanicity. SFAs located in urban and suburban areas were less likely to report changing the types and amounts of USDA Foods than SFAs located in towns or rural areas. For example, 74 percent of SFAs located in rural areas changed their USDA Foods, while only 60 percent in cities reported changes.

TABLE 5.5 *Percentage of SFAs That Changed the Types and Amounts of USDA Foods in Order to Meet Updated Meal Requirements, by SFA Characteristics, SY 2012–13 and SY 2013–14*

SFA Characteristics	SY 2012–13			SY 2013–14		
	Percent	Total SFAs		Percent	Total SFAs	
		Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>		Wgtd <i>n</i>	Unwgted <i>n</i> <sup>2</sup>
All SFAs	73.5	13,449	1,378	70.9	14,677	1,567
<b>SFA size</b>						
Small (1–999)	71.9	6,565	315	69.1	7,521	365
Medium (1,000–4,999)	75.8	4,885	513	73.1	5,224	599
Large (5,000–24,999)	73.6	1,690	373	74.0	1,641	411
Very Large (25,000+)	70.0	309	177	61.3	291	192
<b>Urbanicity</b> <sup>3</sup>						
City	61.5	1,649	266	60.2	1,334	265
Suburban	68.9	2,568	363	69.3	2,700	427
Town	75.0	2,599	261	74.0	2,615	284
Rural	77.6	1,634	488	74.2	7,014	532
<b>Poverty Level</b>						
Low (0–29 percent F/RP)	72.8	2,677	293	71.4	3,016	351
Medium (30–59 percent F/RP)	74.6	6,168	621	73.6	6,765	717
High (60 percent or more F/RP)	72.2	4,603	464	66.9	4,896	499

<sup>1</sup> *n* is less than 1,491 due to item nonresponse.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

<sup>3</sup> Percentage of SFAs that changed the types and amounts of USDA foods in order to meet updated nutrient requirements and meal patterns differed significantly by urbanicity in SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2012–13, question 5.43; SFA Director Survey SY 2013–14, question 5.21.

### *Challenges Associated With Implementing the Updated Meal Requirements*

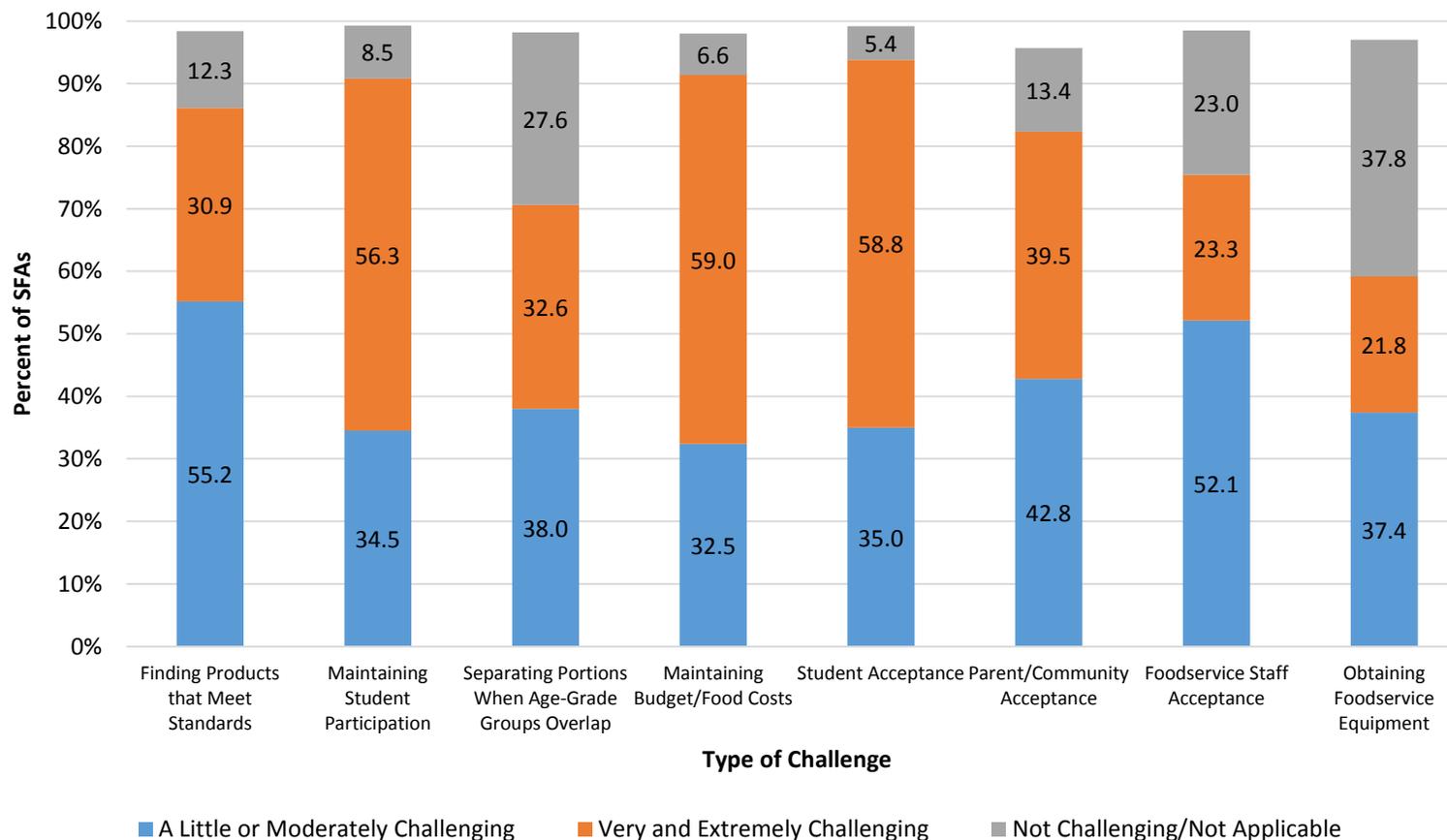
In SY 2013–14, SFAs continued to implement the updated meal requirements for lunch and began to implement the updated requirements for breakfast. SFAs faced a variety of challenges in planning meals that met the updated requirements and in garnering acceptance of these meals from students, parents, and staff. To gain some insight into the challenges of the updated meal requirements, SFA directors were asked to rate the level of challenge of the following potential issues during SY 2013–14:

- Finding products that meet standards
- Maintaining student participation

- Separating portions when age/grade levels overlap
- Maintaining budget/food costs
- Student acceptance
- Parent/community acceptance
- Foodservice staff acceptance
- Obtaining foodservice equipment

Response options for each challenge were: “not challenging,” “a little challenging,” “moderately challenging,” “very challenging,” “extremely challenging,” “not applicable,” and “don’t know.” From FIGURE 5.1, more than 80 percent of SFAs faced some level of challenge (the orange plus the blue areas) related to student acceptance (35+59=94 percent), maintaining student participation (35+56=91 percent), maintaining budget/food costs (32+59=91 percent), finding products that meet standards (55+31=86 percent), and parent and community acceptance (43+40=83 percent). Fewer SFAs reported challenges related to staff acceptance (52+23=75 percent) or obtaining foodservice equipment (37+22=59 percent). The specific issues that were the most challenging for SFAs—those most frequently rated as “very challenging” or “extremely challenging”—were student acceptance and maintaining budget/food costs (59 percent each), as well as maintaining student participation (56 percent).

FIGURE 5.1 *Level of Challenge SFAs (Percent) Report in Implementing the Updated Meal Requirements, SY 2013–14*



**Note:** Columns may not reach 100 percent as some SFAs responded “Don’t Know.”

**Source:** SFA Director Survey SY 2013–14, question 5.1.

The SY 2012–13 survey asked a comparable question about challenges.<sup>41</sup> The list of potential challenges included in the SY 2012–13 survey did not include foodservice staff acceptance or obtaining foodservice equipment. However, for all of the other items in the list, the total proportion of SFAs that reported some level of challenge increased between SY 2012–13 and SY 2013–14 (FIGURE 5.1 and FIGURE 5.2). The increase was most dramatic for finding products that meet standards—86 percent of SFAs reported that this presented some level of challenge in SY 2013–14, compared with 59 percent in SY 2012–13.<sup>42</sup> Part of the increase was due to the percentage of SFAs that found obtaining products that met standards to be very or extremely challenging—25 percent of SFAs in SY 2012–13, compared with 31 percent in SY 2013–14. In addition, the proportion of SFAs that found this to be a little or moderately challenging increased from 34 percent in SY 2012–13 to 55 percent in SY 2013–14.<sup>43</sup> Challenges relating to maintaining student participation and parent/community acceptance increased by 15 percentage points between the two school years, bringing the total proportion of SFAs reporting some level of challenge to more than 80 percent; challenges maintaining student participation increased from 76 percent to 91 percent, and challenges with parent/community acceptance increased from 67 percent to 82 percent.

The significance of differences between SFAs response selection of little/moderate and very/extreme levels of challenge across years (SY 2012–13 and SY 2013–14) was tested (not shown in FIGURE 5.2). Little/moderate challenge levels differed significantly between SY 2012–13 and SY 2013–14. For every type of challenge, SFAs reported increases in little/moderate challenge in SY 2013–14 when compared to SY 2012–13.

The tests did not detect statistically significant differences in very/extreme levels of challenge between SY 2012–13 and SY 2013–14. However, when responses for little, moderate, very, and extreme levels of challenge were aggregated for SY 2012–13 and SY 2013–14 and tested for differences, they were found to be statistically significant. Therefore, for the aggregated values presented in FIGURE 5.2, the differences between years are statistically significant. For example, SFAs were more challenged in SY 2013–14 than SY 2012–13 in finding products that meet standards (86.1 percent versus 58.5 percent). FIGURE 5.2 clearly demonstrates that, overall, SFAs are more challenged in SY 2013–14 than the previous years.

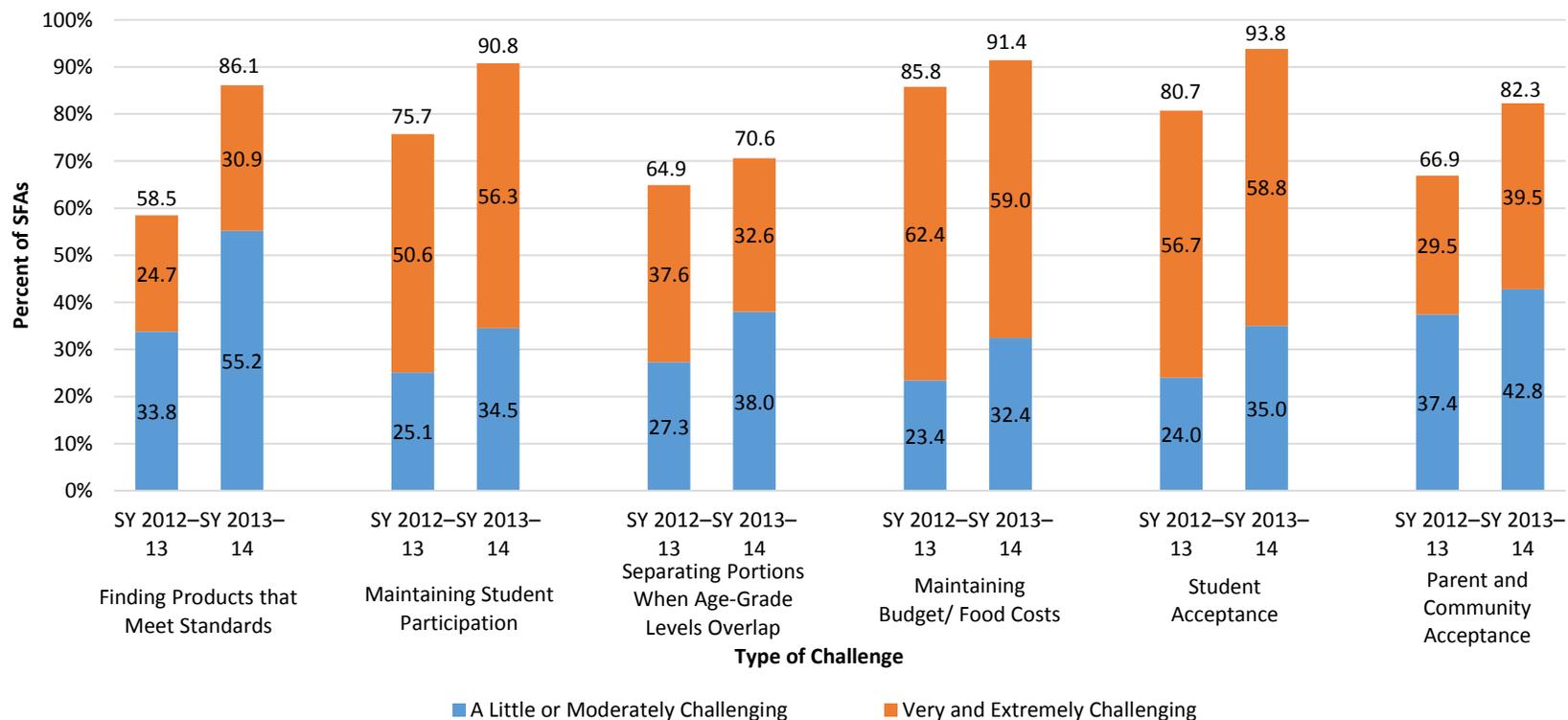
---

<sup>41</sup> The SY 2012–13 survey included separate questions about initial challenges and challenges that were faced as SFAs continued to implement the new standards. Comparisons between SY 2012–13 and SY 2013–14 focus on “continuing” (rather than initial) challenges. There were a few minor differences in wording in the two surveys, as detailed in subsequent footnotes, but none that would be expected to have a major impact on results.

<sup>42</sup> There was a minor difference between the two surveys in the wording for this item. The SY 2012–13 survey used the term “Availability of products that meet standards,” while the SY 2013–14 survey used “Finding products that meet standards.”

<sup>43</sup> There was a minor difference between the two surveys for one response option in the rating scale. The SY 2012–13 survey used the term “minor challenge,” while the SY 2013–04 survey used the term “a little challenging.”

FIGURE 5.2 Comparing Level of Challenge SFAs (Percent) Report in Implementing the Updated Meal Patterns, SY 2012–13 and SY 2013–14



Source: SFA Director Survey SY 2012–13, questions 5.3 and 5.4; SFA Director Survey SY 2013–14, question 5.1.

<sup>1</sup> Little/moderate challenge levels differed significantly between Year 2 and Year 3.

<sup>2</sup> The increase in little/moderate responses and the increase in very/extreme responses between Year 2 and Year 3 differed significantly.

<sup>3</sup> Responses for little, moderate, very, and extreme levels of challenge were aggregated for Year 2 and Year 3 and compared to see if Year 2 and Year 3 level of challenge responses differed. The difference between Year 2 and Year 3 accumulated responses differed significantly.

The most obvious potential explanation for the increase between SY 2012–13 and SY 2013–14 in the prevalence of perceived challenges is that SFAs were implementing the updated breakfast requirements. SFAs were not required to begin implementing the breakfast requirements until SY 2013–14 (see FIGURE 5.3), so they were not transitioning to these requirements when they responded to the SY 2012–13 survey. Furthermore, SFAs were planning to transition to the requirement that all grain products be whole grain-rich during the end of SY 2013–14. Although the whole grain-rich requirement did not go into effect until SY 2014–15, many food purchasing contracts had to be negotiated at the end of the preceding school year (SY 2013–14). The SY 2013–14 survey included separate questions that asked specifically about the breakfast requirements and the whole grain-rich requirements, which are discussed in the following sections.

### 5.3.2 Implementation of Specific Requirements

#### *Breakfast Requirements*

In SY 2013–14, SFAs were required to start implementing the updated meal requirements for breakfast, which are summarized in FIGURE 5.3. SFA directors were asked to report whether it had been challenging to meet key aspects of the updated breakfast requirements. The survey asked specifically about the following aspects of the requirements:

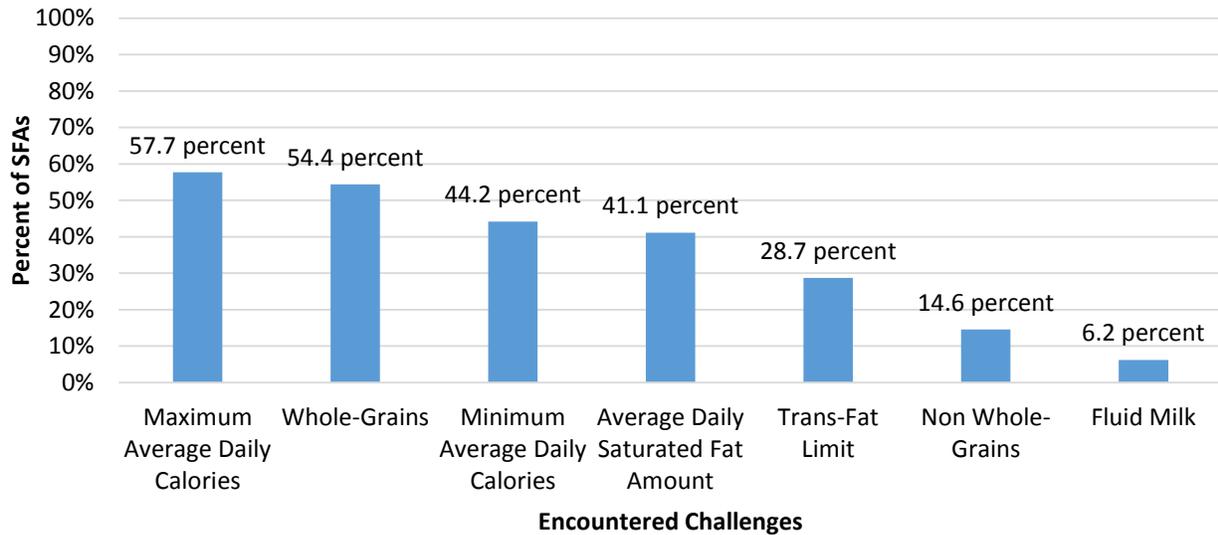
- Whole grains and non-whole grains. The updated requirement calls for at least half of all grains offered over the course of a week to be whole grain-rich at breakfast for SY 2013–14
- Fluid milk. The updated requirement limits milk to 1 percent or fat-free unflavored and fat-free flavored
- Minimum average daily calories
- Maximum average daily calories
- *Trans* fat limit
- Average daily saturated fat content

As seen in FIGURE 5.3, the two breakfast requirements that SFA directors found to be the most challenging were keeping average calories under the maximum (58 percent) and ensuring that at least half of weekly grain offerings were whole grain-rich (54 percent). The next most challenging breakfast requirements were ensuring that average calories were above the minimum (44 percent) and that average saturated fat content was below the maximum<sup>44</sup> (41 percent). A smaller proportion of SFAs (29 percent) found the *trans* fat requirement to be challenging. The two requirements that were least challenging were the requirements for non-whole grains (15 percent) and fluid milk (6 percent).

---

<sup>44</sup> The standard for saturated fat (less than 10 percent of calories from saturated fat) was in place prior to the HHFKA.

FIGURE 5.3 *Percentage of SFAs Indicating Challenges Encountered in Meeting the Updated Breakfast Standards, SY 2013–14*



**Note:** SFAs could select more than one breakfast standard. The estimates are based on the 1,527 SFAs that participate in the SBP.

**Source:** SFA Director Survey SY 2013–14, question 5.4.

### *Whole Grain-Rich Requirement*

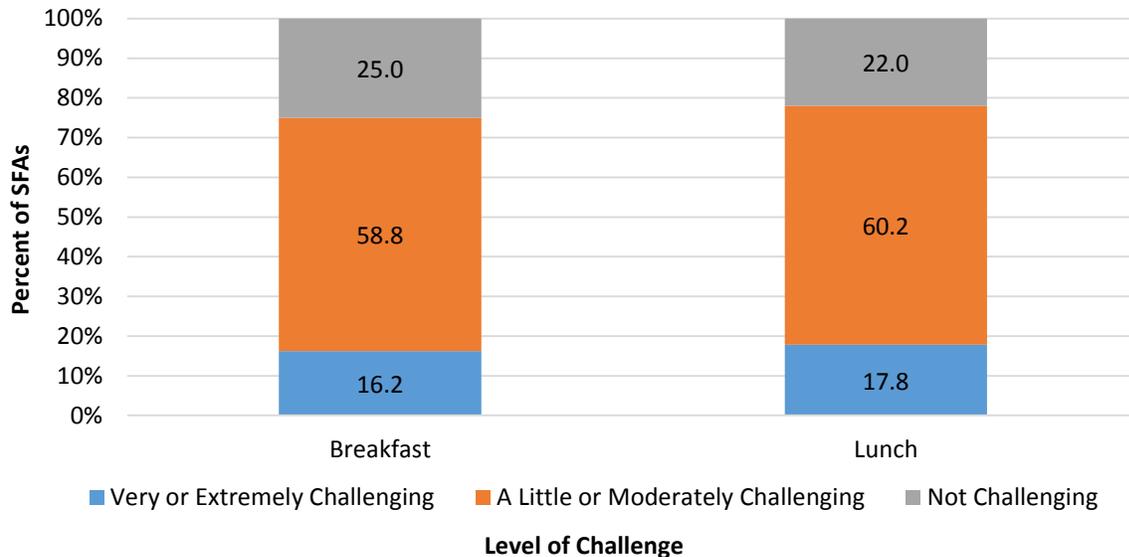
Prior to the updated meal requirements, SFAs were encouraged to offer whole grains, but there was no specific requirement. In SY 2012–13, SFAs began focusing on incorporating more whole grain-rich foods when the initial whole grain requirement—that at least 50 percent of all grains offered over the course of a week be whole grain-rich—went into effect for lunches. In SY 2013–14, when the updated meal requirements for breakfast began to go into effect, including the 50 percent whole grain-rich requirement, SFAs began incorporating whole grain-rich foods into breakfast menus.

### *Making Half of the Grains Offered Whole Grain-Rich*

SFA directors were asked about the degree to which they faced challenges in meeting the 50 percent whole grain-rich requirement during SY 2013–14. Respondents were requested to respond separately for breakfast and lunch. Overall, a majority of SFAs reported experiencing some level of challenge implementing the 50 percent whole grain-rich requirement, and there was little difference in the pattern of responses for breakfast and for lunch (FIGURE 5.4). Roughly one-quarter of SFAs (25 percent for breakfast and 22 percent for lunch) reported that the 50 percent whole grain-rich requirement was not challenging. About 60 percent of SFAs found the requirement to be a little or moderately challenging, and less than 20 percent of SFAs (16 percent for breakfast and 18 percent for lunch) found

the requirement to be very or extremely challenging. These results indicate that the whole grain-rich requirement at lunch continues to be somewhat of a challenge for most SFAs, and that SFAs face comparable challenges in implementing the requirement at breakfast.

FIGURE 5.4 *Level of Challenge Faced by SFAs in Meeting the 50 Percent Whole Grain-Rich Requirements for Breakfast or Lunch Since Implementing the Updated Meal Patterns, SY 2013–14*



Source: SFA Director Survey SY 2013–14, questions 5.7 and 5.10.

SFA directors were also asked about the practices they used in SY 2013–14 to meet the 50 percent whole grain-rich requirement for breakfast and lunch. The four most commonly reported practices were similar for breakfast and lunch (TABLE 5.6). The most frequently reported practices to meet breakfast and lunch requirements were the following: purchasing whole grain-rich products (75 to 78 percent), discontinuing or changing some menu options (62 to 68 percent), adding whole grain-rich items to the menu (about 60 percent), and substituting whole grain-rich items for non-whole grain-rich items (54 to 60 percent).

More SFAs used recipe modification as a strategy for increasing whole grain-rich foods at lunch than at breakfast (55 percent versus 36 percent). Similarly, more SFAs increased ordering of selected USDA Foods as a strategy for increasing whole grain-rich foods at lunch than at breakfast (40 percent versus 26 percent). The differential use of these practices at lunch and breakfast likely reflects differences in the types of foods commonly offered in lunch and breakfast menus. For example, lunch menus are more likely than breakfast menus to include combination foods that include both meat/meat alternates and grains, items made from a recipe, and whole grain USDA Foods such as brown rice and whole grain-rich tortillas.

Relatively few SFAs (13 to 16 percent) increased portion sizes of selected foods as a way to meet the 50 percent whole grain-rich requirement. Similar proportions of SFAs (14 to 16 percent) reported that they did not need to make any changes to their existing menus to meet the 50 percent whole grain-rich requirement.

TABLE 5.6 *Practices Employed by SFAs to Meet the 50 Percent Whole Grain-Rich Requirements for Breakfast and Lunch, SY 2013–14*

Practice	Percent of SFAs	
	Breakfast	Lunch
Purchase Whole Grain-Rich Products	75.1	77.5
Discontinue or Change Some Menu Options	61.7	67.5
Add Whole Grain-Rich Items to the Menu	59.8	60.9
Substitute Whole Grain-Rich Items for Non-Whole Grain-Rich Items	53.7	59.6
Alter Recipes	36.4	55.2
Order Whole Grain-Rich Products From USDA Foods More Often	26.3	39.9
Increase Portion Sizes of Some Items	13.0	16.3
No changes—SFA Already Met the Requirements	16.2	13.6
Other	1.4	1.1
Don't Know	3.5	3.6
Wgtd <i>n</i>	<b>13,856</b>	<b>14,890</b>
Unwgtd <i>n</i>	<sup>a</sup> <b>1,503</b>	<sup>a</sup> <b>1,577</b>

<sup>a</sup> *n* is less than the 1,598 SFAs due to item nonresponse.

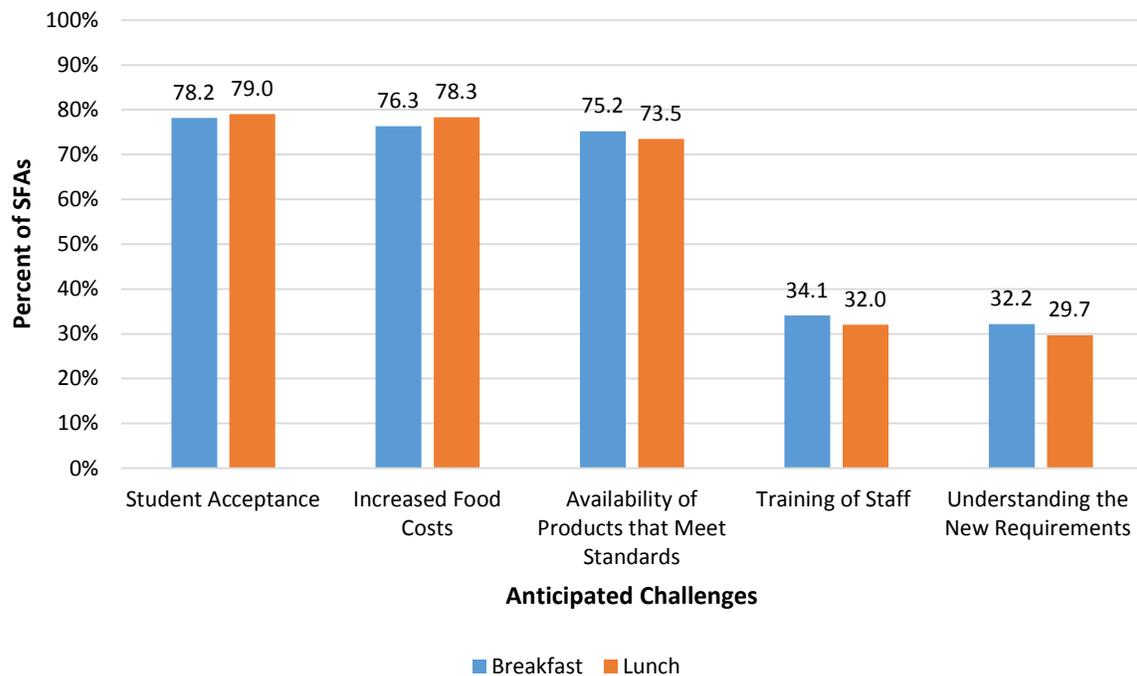
**Note:** Multiple responses were allowed.

**Source:** SFA Director Survey SY 2013–14, questions 5.8 and 5.11.

### *Making All Grains Offered Whole Grain-Rich*

Starting in SY 2014–15, all grains offered at breakfast and lunch must be whole grain-rich. SFAs were asked about the anticipated challenges in meeting this requirement for both breakfast and lunch. SFAs anticipated similar challenges in making all grains whole grain-rich as they faced with making half of the grains whole grain-rich. For both breakfast and lunch, the top three most anticipated challenges included student acceptance (78 to 79 percent), increased food costs (76 to 78 percent), and availability of products that meet the standard (75 to 74 percent; FIGURE 5.5). About one-third of SFAs (30 to 34 percent) anticipated that training staff and ensuring they understood the updated requirement would be a challenge.

FIGURE 5.5 *Challenges Anticipated by SFAs in Meeting the 100 Percent Whole Grain-Rich Requirements for Breakfast and Lunch in SY 2014–15*



**Note:** Based on the 1,502 SFAs that responded for lunch and the 1,574 that responded for breakfast; 8.8 percent of SFAs reported already meeting the requirements for breakfast and 8.9 percent reported already meeting the requirements for lunch.  
**Source:** SFA Director Survey SY 2013–14, questions 5.9 and 5.12.

In recognition of the challenges SFAs have identified in meeting the 100 percent whole grain-rich requirement, FNS is allowing SAs *temporary flexibility* (SY 2014–15 and SY 2015–16) to grant exemptions from this requirement if an SFA demonstrates to the SA a hardship in procuring compliant products that are acceptable to students.<sup>45</sup> In addition, FNS had previously allowed SAs to grant *temporary flexibility* to SFAs to offer enriched, non-whole grain pastas, as some currently available whole grain pastas degrade easily during preparation and storage and, therefore, were not accepted by students.<sup>46</sup> In allowing these alternatives, FNS acknowledged that the food industry may need additional time to develop whole grain-rich pastas that are stable and widely accepted by students, and operators may need additional time to adapt recipes and adjust culinary practices (e.g., preparing and holding products).

<sup>45</sup> USDA, FNS. 2015. "SP20-2015: Request for Exemption from the School Meals' Whole Grain-Rich Requirement for School Years 2014-2015 and 2015-2016." Published February 10. <http://www.fns.usda.gov/sites/default/files/cnd/SP20-2015os.pdf>.

<sup>46</sup> USDA, FNS. 2014. "SP47-2014: Flexibility for Whole Grain-Rich Pasta in School Years 2014-2015 and 2015-2016." Published May 20. <http://www.fns.usda.gov/sites/default/files/SP47-2014os.pdf>.

### *Fruit and Vegetable Requirements for Lunch*

Prior to the implementation of the updated meal requirements, lunches were required to include 1/2 to 3/4 cup of fruit and/or vegetables (fruits and vegetables were considered one meal component in the meal pattern). The updated meal requirements treat fruit and vegetables as separate meal components and specify daily and weekly minimum amounts of each to be included in lunches.<sup>47</sup> To be reimbursable, lunches are required to include 1/2 to 1 cup of fruit and 3/4 to 1 cup of vegetables, depending on the grade level (see TABLE 5.7). In addition, the updated requirements specify weekly minimums for five vegetable subgroups: dark green, red/orange, beans/peas (legumes), starchy, and other vegetables. The updated requirements also specify that fruit must be fresh, frozen, dried, or canned in light/extra light syrup, water, or 100 percent fruit juice. To meet the additional fruit and vegetable requirements at lunch, SFAs may change the types of fruits and vegetables offered and/or the frequency with which specific types of fruits and vegetables are used.

### *Types of Fruit Offered*

More than half of SFAs (55 percent) reported using whole fresh fruit more often in lunch menus since implementing the updated requirements, and about one-third reported using fresh pre-cut fruit and 100 percent fruit juice more frequently (TABLE 5.7). Almost three-quarters of SFAs (74 percent) reported using fruit canned in heavy/regular syrup less frequently, and more than one-third (36 percent) reported using fruit canned in light syrup less frequently. For the other fruit products queried in the survey, 25 to 61 percent of SFAs reported no change in frequency. SFAs that did report changes in these types of fruits most often reported decreased use of frozen and dried fruit (22 to 27 percent) and increased use of fruit canned in water (29 percent). Among SFAs that reported a change in fruit canned in juice, the proportions reporting decreased use and increased use were roughly equivalent (23 and 25 percent). The pattern of changes in fruit offerings is consistent with efforts to control calorie levels and increase student acceptance.

The SY 2012–13 survey included a comparable question about changes in the use of different types of fruit. These data are summarized in Appendix TABLE D.10. Only one statistically significant difference was observed between SY 2012–13 and SY 2013–14: there was a modest increase in the proportion of SFAs that increased the use of frozen pre-cut fruit (from 14 percent to 17 percent) and an off-setting decrease in the proportion of SFAs that decreased use of this type of fruit (from 25 percent to 22 percent).

---

<sup>47</sup> The same is true for fruit in breakfasts. Vegetables are not required at breakfast. Vegetables may be substituted for fruits, but the first two cups per week of any such substitution must be from the dark green, red/orange, beans and peas (legumes), or “other vegetables” subgroups, as defined in CFR § 210.10(c)(2)(iii). See <http://www.gpo.gov/fdsys/pkg/CFR-2012-title7-vol4/pdf/CFR-2012-title7-vol4-sec210-10.pdf>.

TABLE 5.7 *Changes in the Frequency of Using Fruit or Vegetable Products for Lunch Since the Implementation of the Updated Meal Pattern Requirements, as Reported by SFAs, SY 2013–14*

Fruit Products	Percentage of SFAs Indicating			Total SFAs	
	Use More Often	Same Frequency	Use Less Often	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>
Fresh Whole	54.9	40.8	4.3	14,856	1,576
Fresh Pre-Cut	34.2	51.4	14.4	14,735	1,566
Frozen Whole	15.8	60.8	23.4	14,687	1,558
Frozen Pre-Cut	17.2	60.8	22.0	14,468	1,548
Canned with Water	29.0	56.5	14.5	14,626	1,558
Canned with Juice	23.2	52.3	24.5	14,668	1,561
Canned with Light Syrup	19.7	44.5	35.8	14,653	1,557
Canned with Heavy or Regular Syrup	1.0	25.4	73.6	14,498	1,544
100% Fruit Juice	33.1	57.7	9.3	14,760	1,567
Dried Fruit	17.6	55.5	27.0	14,450	1,541
Vegetable Products					
Fresh Whole	48.5	45.7	5.7	14,688	1,562
Fresh Pre-Cut	49.0	43.2	7.8	14,671	1,562
Frozen Whole	22.9	62.4	14.7	14,533	1,551
Frozen Pre-Cut	31.4	57.5	11.1	14,642	1,559
Canned, No Salt Added	31.4	49.6	18.9	14,532	1,551
Canned, Reduced Sodium	37.5	45.5	17.1	14,557	1,553
Canned, Regular Sodium	4.5	34.4	61.1	14,429	1,544

<sup>1</sup> *n* is less than 1,598 due to item nonresponse.

**Note:** Each row represents the SFAs' answers to different questions on the survey. Percentages will add up to 100 percent, horizontally.

**Source:** SFA Director Survey SY 2013–14, questions 5.5 and 5.6.

### *Types of Vegetables Offered*

About half of all SFAs (49 percent) reported increased use of fresh pre-cut vegetables and increased use of whole fresh vegetables in lunch menus since implementing the updated meal requirements (TABLE 5.7). More than one-third of SFAs (38 percent) reported increased use of reduced sodium canned vegetables, and close to one-third (31 percent) reported increased use of frozen pre-cut vegetables and no-salt-added canned vegetables. More than 60 percent of SFAs reported decreased use of regular canned vegetables (that is, canned vegetables that are not reduced sodium or no-salt-added). Most SFAs (62 percent) reported no change in the use of frozen whole vegetables, and SFAs that did report a change were more likely to report increased use than decreased use (23 percent versus 15 percent). The pattern of changes in vegetable offerings is consistent with efforts to control sodium levels and/or increase student acceptance.

The SY 2012–13 survey included a comparable question about changes in the use of different types of vegetables. These data are summarized in Appendix TABLE D.11. Relative to SY 2012–13, larger proportions of SFAs in SY 2013–14 reported decreased use of regular sodium canned vegetables (61 percent versus 49 percent). A comparable, but more modest trend was noted for increased use of reduced-sodium canned vegetables (38 percent versus 35 percent). These results should be interpreted with caution, because the SY 2013–14 version of the survey (but not the SY 2012–13 version) asked about no-salt-added vegetables. The presence of this additional category of vegetables could have influenced responses for SY 2013–14.

### *Purchasing Vegetables*

SFA directors were asked whether they had encountered difficulties purchasing each of the vegetable subgroups and what specific difficulties they faced. TABLE 5.8 shows the percentage of SFAs that experienced difficulty purchasing certain vegetables by SFA characteristic in SY 2013–14. Less than one-third (29 percent) of SFA directors reported difficulty purchasing one or more of the vegetable subgroups (data not shown). The vegetable subgroups most commonly reported as problematic were red/orange vegetables (15 percent) and dark green vegetables (14 percent), followed by beans/peas (9 percent). Very small proportions of SFAs reported difficulties with purchasing other vegetables and starchy vegetables (5 and 3 percent, respectively). There were significant differences in the proportions of SFAs that had difficulty purchasing some of the vegetable subgroups based on SFA size and urbanicity.

TABLE 5.8 *Percentage of SFAs Having Difficulty Purchasing Vegetables, by SFA Characteristics, SY 2013–14*

SFA Characteristics	Dark Green			Red/Orange			Beans/Peas			Starchy			Other		
	Percent	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>
All SFAs	13.7	14,605	1,553	14.5	14,657	1,560	9.1	14,524	1,550	3.3	14,453	1,541	5.2	13,190	1,417
<b>SFA size</b> <sup>2</sup>															
Small (1–999)	13.2	7,513	364	15.0	7,534	365	7.4	7,454	361	4.4	7,397	358	5.6	6,766	326
Medium (1,000–4,999)	14.0	5,186	594	13.0	5,211	598	10.5	5,161	592	1.8	5,158	591	4.7	4,636	532
Large (5,000–24,999)	15.2	1,620	406	15.7	1,624	407	12.2	1,619	406	3.3	1,613	404	5.6	1,513	378
Very Large (25,000+)	14.3	286	189	18.4	288	190	10.6	289	191	1.1	285	188	2.9	275	181
<b>Urbanicity</b> <sup>3</sup>															
City	14.7	1,348	263	16.4	1,358	265	9.6	1,346	263	4.8	1,333	260	7.5	1,200	245
Suburban	10.3	2,663	420	12.9	2,681	423	9.6	2,668	422	1.9	2,662	419	1.9	2,393	386
Town	15.6	2,605	283	14.3	2,605	283	13.0	2,586	282	4.1	2,586	282	9.9	2,359	255
Rural	15.5	6,975	528	16.6	7,000	530	8.3	6,910	524	3.4	6,857	521	5.1	6,245	474
<b>Poverty Level</b>															
Low (0–29 percent F/RP)	11.8	3,035	347	9.7	3,037	348	9.3	3,036	348	3.3	3,019	344	4.9	2,762	313
Medium (30–59 percent F/RP)	15.0	6,654	708	16.1	6,715	714	9.8	6,621	707	2.3	6,564	702	5.0	5,965	648
High (60 percent or more F/RP)	13.3	4,916	498	15.1	4,905	498	8.0	4,867	495	4.5	4,870	495	5.7	4,463	456

<sup>1</sup> *n* is less than 1,598 due to item nonresponse.

<sup>2</sup> Percentage of SFAs reporting difficulty purchasing starchy vegetables differed by SFA size.

<sup>3</sup> Percentage of SFAs reporting difficulty purchasing red/orange and other vegetables differed by urbanicity.

**Source:** SFA Director Survey SY 2013–14, question 5.19.

TABLE 5.9 demonstrates that among SFAs that reported difficulty purchasing vegetables in one or more of the subgroups, the two most commonly reported reasons were subgroup items “not acceptable to students” (59 percent) or subgroup items “too expensive” (58 percent; Appendix TABLE D.12).<sup>48</sup> About half of the SFAs that reported difficulty purchasing vegetables said limited variety in their local area was a problem. One-third cited limited availability as a contributing factor and one quarter indicated that items required too much preparation.<sup>49</sup> The proportion of SFAs that cited limited availability as a contributing factor to difficulty purchasing one or more of the vegetable subgroups differed significantly by urbanicity. SFAs located in suburban areas were less likely to report problems with limited availability than SFAs located in other areas.

---

<sup>48</sup> Among SFA directors who reported difficulties with purchasing dark green, red/orange, starchy, or other vegetables, the cost of vegetables was the most commonly reported reason (dark green: 84 percent; red/orange: 81 percent; starchy: 85 percent; and other vegetables: 94 percent; Appendix TABLE D.12).

<sup>49</sup> Among SFA directors who reported difficulties with purchasing beans/peas (legumes), the amount of preparation required was the most commonly reported reason (85 percent; Appendix TABLE D.12).

TABLE 5.9 *Reasons SFAs Had Difficulty Purchasing One or More Vegetable Subgroups, Among Those Reporting Difficulties, by SFA Characteristics, SY 2013–14*

SFA Characteristics	Percent of SFAs					Total SFAs	
	Items not acceptable to students	Items too expensive	Not enough variety on market	Limited availability of items	Items require too much preparation	Wgtd <i>n</i>	Unwgted <i>n</i>
All SFAs	58.9	57.5	50.5	32.8	25.3	4,399	<sup>a</sup> 500
<b>SFA size</b>							
Small (1–999)	55.3	56.9	47.3	31.5	21.8	2,023	101
Medium (1,000–4,999)	58.7	57.8	50.0	31.3	27.2	1,733	200
Large (5,000–24,999)	69.2	56.9	61.6	41.0	32.1	548	137
Very Large (25,000+)	79.0	67.3	62.2	40.3	27.6	95	62
<b>Urbanicity<sup>1</sup></b>							
City	48.2	44.1	42.7	36.0	20.5	440	84
Suburban	58.6	54.8	52.3	25.0	25.8	793	127
Town	66.4	60.2	50.1	39.0	34.3	884	102
Rural	58.7	60.6	51.2	33.6	23.2	2,208	178
<b>Poverty Level</b>							
Low (0–29 percent F/RP)	54.5	61.7	41.1	28.4	22.6	754	91
Medium (30–59 percent F/RP)	62.8	55.3	52.7	31.4	27.9	2,187	243
High (60 percent or more F/RP)	55.3	58.5	52.1	37.2	22.9	1,458	166

<sup>1</sup> Percentage of SFAs reporting difficulty purchasing vegetables due to limited availability of items differed significantly by urbanicity.

<sup>a</sup> Table is limited to 500 SFAs that reported difficulty purchasing one or more of the vegetables subgroups.

**Source:** SFA Director Survey SY 2013–14, question 5.20.

### Calorie Requirements

The updated meal requirements specify minimum and maximum calorie levels for breakfast and lunch, and the calorie ranges vary by grade level. The previous requirements specified only minimum calorie levels. Thus, the need to plan meals that satisfy minimum calorie levels without exceeding maximum levels could be a major adjustment for SFAs.

Historically, meals served to or selected by students have not met minimum calorie standards. For example, in the fourth School Nutrition Dietary Assessment Study (SNDA-IV), which collected data during SY 2009–10, only 39 percent of schools served lunches that, on average, met the minimum calorie standard in effect at the time, and only 19 percent served breakfasts that, on average, met the

minimum calorie standard.<sup>50</sup> However, the SNDA-IV study also found that two-thirds (65 percent) of all schools offered NSLP lunches that met the minimum calorie level defined in the School Meal Initiative standards, while only about 20 percent of schools met the School Meal Initiative standard for calories for breakfast.<sup>51</sup>

SFA directors were asked what the biggest challenge was in meeting the calorie requirements—that is, whether it was more of a challenge to ensure that calories are above the minimum or that calories do not exceed the maximum.<sup>52</sup> This question was asked for both breakfast and lunch for each grade level (K–5, 6–8, 9–12, and other configurations).

For both breakfast and lunch and for all grade levels, most SFA directors said that the biggest challenge in meeting the calorie requirements was not exceeding the maximums (FIGURE 5.6 and FIGURE 5.7). For breakfast, this response was given by 54 to 58 percent of SFAs that serve a specific grade level. Only 18 to 25 percent of SFAs indicated that meeting the minimum calorie requirements was the biggest challenge. Between 20 and 25 percent of SFAs said that meeting the calorie requirements for breakfast was not a challenge.

The general pattern of findings was similar for lunch; however, the proportions of SFAs that found the calorie maximums to be the biggest challenge were somewhat larger. About two-thirds of SFAs that served a given grade level (62 to 67 percent) indicated that keeping lunch calories below the maximum was the biggest challenge. Between 12 and 22 percent of SFAs found that meeting the minimum requirement was the biggest challenge. SFAs (16 to 22 percent) reported that it was not a challenge to meet the calorie requirements for lunch.

At both breakfast and lunch, a larger proportion of SFAs reported having challenges with meeting the minimum calories for grades 9–12 than for the other grade levels. Conversely, more SFAs reported having challenges with keeping calories below maximums for grades K–5 and grades 6–8 than for grades 9–12 (the statistical significance of these differences was not tested).<sup>53</sup>

---

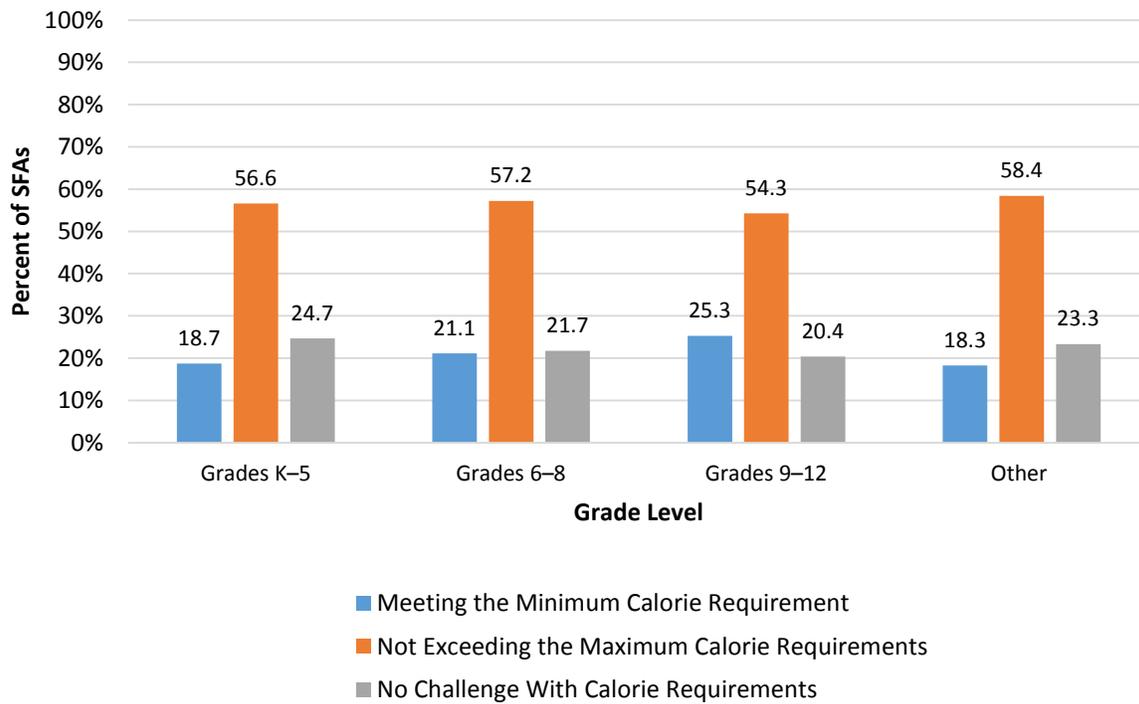
<sup>50</sup> The new requirements do not call for SFAs to estimate calorie content based on meals actually selected by or served to students. However, the requirements do call for planned menus to be developed based on historical data about students' food selection patterns, rather than a simple average of all items offered to students.

<sup>51</sup> USDA, FNS, Office of Research and Analysis: Mary Kay Fox, Elizabeth Condon, Mary Kay Crepinsek, et al. 2012. "School Nutrition Dietary Assessment Study IV, Vol. I: School Foodservice Operations, School Environments, and Meals Offered and Served." Published December 12. <http://www.fns.usda.gov/school-nutrition-dietary-assessment-study-iv>.

<sup>52</sup> Nutrient standards apply to meals offered to students.

<sup>53</sup> Given anecdotal evidence that high schools students complain about not getting enough food, it seems possible that SFAs misinterpreted these questions. For example, SFAs that reported challenges in meeting the minimum calories for grades 9–12 may have meant that they are having trouble keeping calories low.

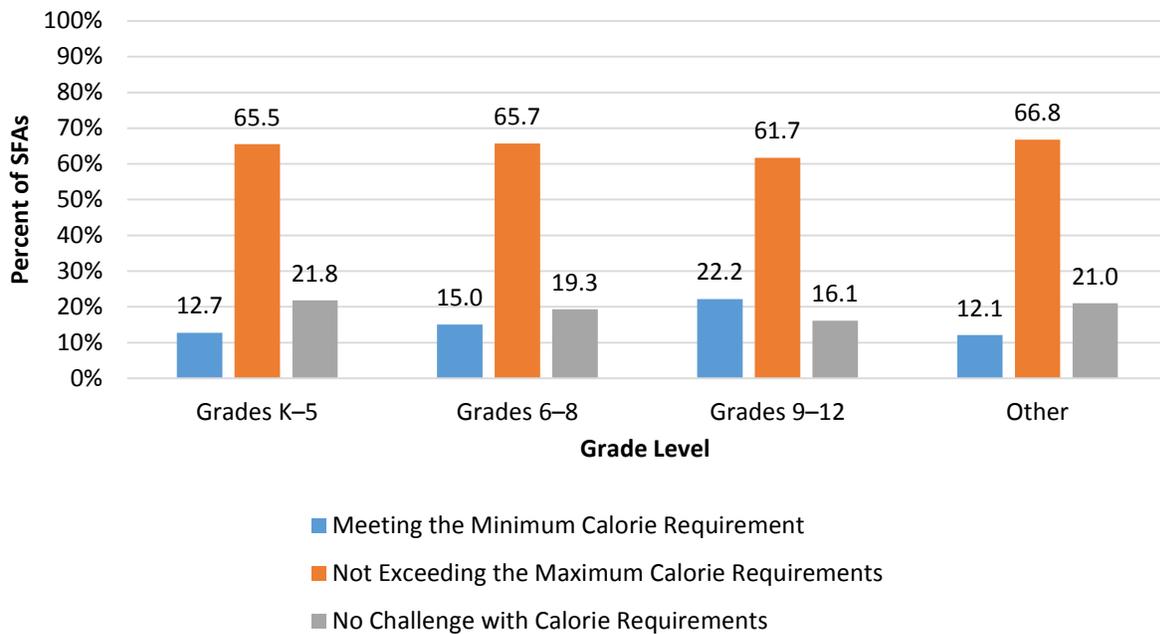
FIGURE 5.6 *Biggest Challenge Indicated by SFAs in Meeting the Calorie Requirements for Breakfast by Grade Level, SY 2013–14*



**Note:** Estimates are based on the number of SFAs that served each grade level. For grade K-5, *n* is less than 1,376 SFAs that reported having grades K-5 due to item nonresponse. Percentage based on a weighted response of 10,047 (unweighted 1,203). For grades 6-8, *n* is less than 1,172 SFAs that reported having graded 6-8 due to item nonresponse. Percentages based on a weighted response of 7,605 (unweighted 1,039). For grades 9-12, *n* is less than 1,253 SFAs that reported having grades 9-12 due to item nonresponse. Percentage based on a weighted response of 8,872 (unweighted 1,126).

**Source:** SFA Director Survey SY 2013-14, question 5.13.

FIGURE 5.7 *Biggest Challenge Indicated by SFAs in Meeting the Calorie Requirements for Lunch by Grade Level, SY 2013–14*



**Note:** Estimates are based on the number of SFAs that served each grade level. For grade K–5, *n* is less than 1,376 SFAs that reported having grades K–5 due to item nonresponse. Percentage based on a weighted response of 10,047 (unweighted 1,203). For grades 6–8, *n* is less than 1,172 SFAs that reported having graded 6–8 due to item nonresponse. Percentages based on a weighted response of 7,605 (unweighted 1,039). For grades 9–12, *n* is less than 1,253 SFAs that reported having grades 9–12 due to item nonresponse. Percentage based on a weighted response of 8,872 (unweighted 1,126).

**Source:** SFA Director Survey SY 2013–14, question 5.14.

### *Students Who Request Additional Foods*

Some students may request additional foods at lunch or breakfast. This may be especially true among low-income children, student athletes, and students who do not go home immediately after school. SFA directors were asked if they had made any adjustments to meet students' needs or desire for additional foods, and if so, what types of adjustments were made. In SY 2013–14, 71 percent of SFAs reported making adjustments for groups of students to meet their needs or desire for additional foods (data not shown).

TABLE 5.10 shows that among SFAs that made adjustments for students who requested additional food, the most frequent strategy was offering more fruits and vegetables. This practice was used by 74 to 84 percent of SFAs that made adjustments, and was used most often for grades K–5. Other strategies were reported by many fewer SFAs and, for some, there was a notable variation by grade level. For example, 47 percent of SFAs that made adjustments to meet students' needs for additional foods did so by increasing à la carte offerings for grades 9–12, and 39 percent of SFAs increased à la carte offerings for grades 6–8. In contrast, only 21 to 28 percent of SFAs, respectively, increased à la carte offerings for grades K–5 or other grade spans such as K–8 and K–12. Similarly, 26 to 28 percent of SFAs addressed

students' needs for additional foods by offering second meals for grades 6–8 and 9–12, but fewer than 20 percent of SFAs reported using this strategy for other grades. Between 21 and 24 percent of SFAs addressed students' additional food needs by offering a second serving of milk; there was little variation in this practice across grade levels. Few SFAs (less than 5 percent) responded by offering other Federal nutrition programs.

TABLE 5.10 *Actions That SFAs Have Taken to Meet Students' Needs or Wants for Additional Foods, by Grade Level, SY 2013–14*

Grade Level	Percentage of SFAs						Total SFAs	
	Increased Fruits and Vegetables <sup>1</sup>	Offered Second Milk	Offered Second Meal <sup>1</sup>	Increased À La Carte Offerings <sup>1</sup>	Offered Other Federal Nutrition Programs <sup>1</sup>	Other	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>2</sup>
Grades K–5	84.3	23.9	15.7	20.7	4.9	6.2	4,233	503
Grades 6–8	78.7	23.2	26.0	38.6	4.2	6.6	4,194	508
Grades 9–12	73.6	20.8	28.3	47.0	3.7	8.2	4,478	537
Other (e.g., K–8, K–12, or 6–12)	78.8	20.6	18.5	28.3	3.7	10.9	1,991	220

<sup>1</sup> Percentage of SFAs differed significantly by grade level.

<sup>2</sup> *n* is less than 624 SFAs that reported taking actions in SY 2013–14, due to either: item nonresponse or SFAs don't have this school type.

**Note:** SFAs could respond to all actions, so the percentages will not add up to 100 percent, horizontally. SFAs have multiple school classifications so the percentages will not add up 100 percent vertically.

**Source:** SFA Director Survey SY 2013–14, question 5.18.

### Sodium Requirements

For the first time, the updated meal requirements established quantitative limits on the sodium content of school meals. There are different targets for breakfast, lunch, and each grade level (as shown in TABLE 5.1), and the limits are being phased in over a ten year period (see

TABLE 5.2). Starting in SY 2012–13, schools were encouraged to plan for the first targets, which went into effect in SY 2014–15. The second set of sodium targets go into effect in SY 2017–18, and the final targets—which call for an approximately 50 percent reduction from sodium levels in meals prior to the standards—are to be implemented by SY 2022–23.

SFA directors were asked if they knew the sodium content of the meals they were serving in SY 2013–14. Only 21 percent of SFAs responded affirmatively (TABLE 5.11). This is a significantly smaller proportion than responded affirmatively to the same question in SY 2012–13 (21 percent versus 30 percent). For both school years, SFA directors from very large SFAs were most knowledgeable about the sodium content of their meals. It is unclear why the proportion of SFAs who are knowledgeable about the sodium content of their meals decreased between SY 2012–13 and SY 2013–14. SFAs would only have this knowledge if they conducted a nutrient analysis. Under the updated meal requirements, SFAs are not required to conduct a nutrient analysis, but may do so to confirm compliance with the nutrient-

based standards.<sup>54,55</sup> It is possible that some SFAs may have conducted an analysis in SY 2012–13 to get an estimate of baseline sodium, relative to the impending sodium targets, but did not repeat this practice in SY 2013–14 with their new menus.

TABLE 5.11 *Percentage of SFAs That Knew Sodium Content of Meals, by SFA Characteristics, SY 2012–13 and SY 2013–14*

SFA Characteristics	SY 2012–13			SY 2013–14		
	Percent	Total SFAs		Percent	Total SFAs	
		Wgtd <i>n</i>	Unwgtd <i>n</i>		Wgtd <i>n</i>	Unwgtd <i>n</i>
All SFAs	30.1	14,640	<sup>a</sup> 1,461	<sup>b</sup> 20.8	14,921	<sup>c</sup> 1,577
<b>SFA Size<sup>1</sup></b>						
Small (1–999)	26.5	7,413	357	17.0	7,765	376
Medium (1,000–4,999)	30.5	5,171	544	20.6	5,224	599
Large (5,000–24,999)	39.2	1,748	383	34.0	1,643	411
Very Large (25,000+)	56.5	309	177	51.5	290	191
<b>Urbanicity</b>						
City	35.3	1,818	278	28.7	1,371	264
Suburban	29.9	2,755	382	21.4	2,705	428
Town	28.2	2,783	274	20.8	2,666	287
Rural	29.6	7,284	527	20.3	7,141	538
<b>Poverty Level</b>						
Low (0–29 percent F/RP)	31.5	2,866	308	20.7	3,088	356
Medium (30–59 percent F/RP)	31.1	6,790	664	20.9	6,797	717
High (60 percent or more F/RP)	27.9	4,984	489	20.8	5,036	504

<sup>1</sup> Percentage of SFAs that know sodium levels of meals differed significantly by SFA size in SY 2012–13 and SY 2013–14.

<sup>a</sup> *n* is less than 1,491 due to item nonresponse.

<sup>b</sup> Percentage of SFAs that know sodium levels differed significantly in SY 2013–14 when compared to SY 2012–13.

<sup>c</sup> *n* is less than 1,598 due to item nonresponse.

**Source:** SFA Director Survey SY 2012–13, question 5.31; SFA Director Survey SY 2013–14, question 5.15.

SFA directors who were knowledgeable about the sodium content of their meals were asked to report the average daily sodium content of breakfasts and lunches for each grade level. TABLE 5.12 provides the average daily sodium levels reported for breakfast and lunch, as well as the first sodium targets. For grades K–5 and 6–8, the reported average sodium content of both breakfasts and lunches was below the respective first sodium target in SY 2013–14. The average sodium content of meals for grades 9–12 was slightly higher than the first sodium target for both breakfast and lunch.

<sup>54</sup> USDA. 2014. “Nutrient Analysis Protocols: How to Analyze Menus for USDA’s School Meals Programs.” Published in February. <http://healthymeals.nal.usda.gov/hsmrs/Software/For%20Web/NAPManual.pdf>.

<sup>55</sup> USDA. 2012. “Nutrition Standards in the National School Lunch and School Breakfast Programs; Final Rule.” Published January 26. <http://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf>.

Reported average sodium contents of breakfasts were similar to those observed in SNDA-IV (SY 2009–10), which ranged from 549 mg for elementary schools to 644 mg for high schools. Reported sodium contents of lunches for grades K–5 (1,074 mg) and 6–8 (1,170 mg) were lower (16 to 19 percent) than those observed in SNDA-IV for elementary schools (1,324 mg) and middle schools (1,392 mg), respectively.<sup>56</sup> The reported sodium content for lunches for grades 9–12 was also lower than that of high schools lunches in SNDA-IV, but the difference was less dramatic (1,441 mg versus 1,515 mg).

TABLE 5.12 *Average Sodium Content of Breakfasts and Lunches by Grade Level, Among SFAs That Know the Sodium Content of Their Meals.*

Grade Level	Target 1 Sodium Levels (mg)	SY 2012–13			SY 2013–14		
		Amount (mg)	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>	Amount (mg)	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>
Breakfast							
Grades K–5	≤540	568.1	2,669	306	529.4	1,774	291
Grades 6–8	≤600	597.4	2,108	292	584.3	1,610	274
Grades 9–12	≤640	639.1	2,067	289	643.2	1,590	280
Other (e.g., K–8, K–12, or 6–12) <sup>2</sup>		NR	NR	NR	554.0	725	124
Lunch							
Grades K–5	≤1,230	1,039.7	2,711	362	1,074.4	2,192	338
Grades 6–8	≤1,360	1,133.5	2,642	356	1,170.0	2,069	323
Grades 9–12	≤1,420	1,332.2	2,546	348	1,441.8	2,074	330
Other (e.g., K–8, K–12, or 6–12) <sup>2</sup>		NR	NR	NR	1,086.4	764	124

<sup>1</sup> *n* is less than 434 due to either item nonresponse or “not available” responses.

<sup>2</sup> Schools that did not fall into the K–5, 6–8, or 9–12 categories were classified as other.

**Note:** Based on 434 SFAs that reported knowing sodium levels in meals.

**Source:** SFA Director Survey SY 2012–13, question 5.32; SFA Director Survey SY 2013–14, question 5.15a.

TABLE 5.13 provides information on the percentage of SFAs whose reported sodium content of meals met the three sodium targets for breakfast and lunch (Appendix TABLE D.13). Between SY 2012–13 and SY 2013–14, the percentage of SFAs with average sodium levels that met the first sodium target increased by 9 to 13 percent for breakfast, and as much as 5 percent for lunch. For grades K–5, the increase in the percentage of SFAs meeting the first sodium target at breakfast was statistically significant. The percentage of SFAs with average sodium levels that met the second sodium targets increased by as much as 7 percent for breakfast between SY 2012–13 and SY 2013–14, but for lunch, the percentage of SFAs decreased. The percentage of SFAs whose reported sodium levels met the final targets for both breakfast and lunch decreased by as much as 6 percent between SY 2012–13 and SY 2013–14 (although the differences were not statistically significant).

<sup>56</sup> Comparisons are made to the SNDA-IV study to provide context for the current findings; however, these comparisons were not tested for statistical significance.

TABLE 5.13 *Percentage of SFAs Meeting Intermediate and Final Sodium Targets by Grade Level, SY 2012–13 and SY 2013–14*

Grade Level	SY 2012–13					SY 2013–14				
	Percent Meeting Target 1	Percent Meeting Target 2	Percent Meeting Final Targets	Total SFAs		Percent Meeting Target 1	Percent Meeting Target 2	Percent Meeting Final Targets	Total SFAs	
				Wgtd $n$	Unwgt'd $n^1$				Wgtd $n$	Unwgt'd $n^2$
Breakfast										
Grades K–5	54.5	35.7	26.7	2,269	306	<sup>a</sup> 68.2	40.0	26.3	1,760	288
Grades 6–8	60.0	39.5	30.4	2,108	292	70.3	44.9	30.9	1,596	271
Grades 9–12	55.3	37.7	31.8	2,067	289	64.4	34.6	23.9	1,574	276
Lunch										
Grades K–5	73.9	29.6	20.3	2,711	362	74.1	24.6	18.1	2,168	334
Grades 6–8	75.1	30.8	20.4	2,642	356	80.4	27.1	17.4	2,059	321
Grades 9–12	67.7	27.0	16.9	2,546	348	68.7	17.9	10.8	2,064	328

<sup>1</sup>  $n$  is less than the 527 SFAs that reported knowing the sodium levels of meals due to item nonresponse in SY 2012–13.

<sup>2</sup>  $n$  is less than the 434 SFAs that reported knowing the sodium levels of meals due to item nonresponse in SY 2013–14.

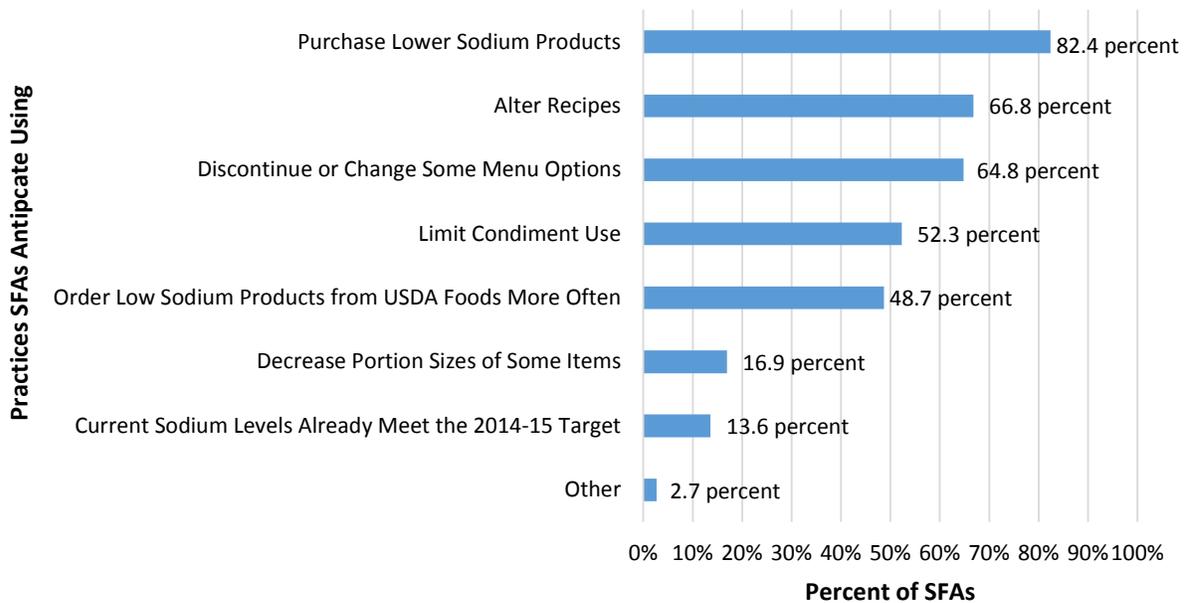
<sup>a</sup> The percentage of SFAs meeting Target 1 for Grades K–5 at breakfast differed significantly between SY 2012–13 and SY 2013–14.

**Note:** See Appendix TABLE D.13 for the target amounts of sodium by grade level.

**Source:** SFA Director Survey SY 2012–13, question 5.32; SFA Director Survey SY 2013–14, questions 5.15a.

SFA directors were also asked about practices they anticipated implementing in order to meet the first sodium target when it went into effect in SY 2014–15. Fourteen percent of SFA directors reported that their meals already met the first sodium target (Appendix TABLE D.14). Almost all of the remaining SFAs (82 percent) anticipate purchasing lower sodium products (FIGURE 5.8). About two-thirds of SFAs expect to alter recipes (67 percent) or discontinue/change some menu choices (65 percent). About half expect to limit condiment use (52 percent) or order low-sodium USDA Foods more often (49 percent). Relatively few SFAs (17 percent) expect to reduce sodium levels by decreasing portion sizes. There were some significant differences in anticipated use of specific strategies by SFA size and urbanicity (Appendix TABLE D.14). In general, small SFAs and SFAs located in urban areas were less likely than other SFAs to report plans to use most of the sodium-reduction strategies.

FIGURE 5.8 *Practices SFAs Anticipate Using to Reduce Sodium Levels, by SFA Characteristics, SY 2013–14*



Source: SFA Director Survey SY 2013–14, question 5.16.

### *Plate Waste and Student Acceptance*

As previously described, FNS made changes in the rules governing offer versus serve—a provision that allows students to decline one or more of the meal components/items that schools must offer in reimbursable meals. The goal of OVS is to reduce waste by allowing students to decline foods they do not intend to eat.<sup>57</sup> OVS also helps SFAs and schools to determine what and how much food to prepare, based on student participation and food selection trends. This flexibility can help SFAs contain costs and minimize food waste. OVS is optional for all grade levels at breakfast and optional at lunch for all grade levels except senior high schools, where it is required.

Under the updated OVS rules, students must take at least one half-cup serving of fruit or vegetables in order for their meal (breakfast or lunch) to be reimbursable. In the past, there were no rules about the specific types of food students were required to take. The updated OVS rules for lunch went into effect in SY 2012–13 at the same time the updated lunch requirements were implemented. Students must take at least three of the five required meal components, in the required amounts, and one of those selections must be at least one half-cup of a fruit or vegetable. The updated OVS rules for breakfast did

<sup>57</sup> USDA, FNS. 2014. “SP57-2014: Offer Versus Serve. Guidance For The National School Lunch Program And The School Breakfast Program.” Published July 21. <http://www.fns.usda.gov/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16>.

not go into effect until SY 2014–15. Under the updated OVS rules for breakfast, schools must offer a minimum of four menu items and students must select at least three of the offered items, one of which must be a fruit or vegetable.

Some stakeholders have voiced concern that the requirement that students take a serving of fruit or vegetables will increase plate waste. Some stakeholders have also raised concerns that the updated meal requirements in general will lead to increased plate waste, because the meals will be less palatable to students, and the increased portion sizes for fruits, vegetables, and whole grains will be less acceptable to students. As noted previously (*FIGURE 5.1*), more than half of all SFAs reported that gaining student acceptance and maintaining student participation since implementation of the updated meal requirements has been very or extremely challenging.

SFA directors were asked whether they have observed any changes in the amount of food students waste or throw away at lunch since implementing the updated meal requirements. This question was asked for the following types of food: milk, main dish/entrée, bread/grain items, salad/raw vegetables, cooked vegetables, fruit, desserts, and other types of foods.

In SY 2013–14, most SFA directors (75 percent) did not observe any change in the amount of milk that was wasted, relative to the amount that was wasted before implementation of the updated lunch requirements (*TABLE 5.14*). The same was true for desserts. However, more than 60 percent of SFA directors reported that students wasted more vegetables in SY 2013–14 than before the updated requirements were in place. This was true for cooked vegetables (63 percent) and salad/raw vegetables (61 percent). In addition, 40 percent or more of SFA directors reported increased waste for main dish/entrée items (40 percent), fruit (47 percent), and bread/grain items (49 percent).

TABLE 5.14 *Percentage of SFAs Observing Changes in the Amount of Plate Waste at Lunch Since Implementation of the Updated Meal Requirements, SY 2012–13 and SY 2013–14*

SY 2012–13						
Food	Percentage of SFAs that reported:				Total SFAs	
	Students Waste More	Students Waste Less	No Change	Don't Know	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>
Fluid Milk	11.8	5.9	75.3	7.0	14,932	1,481
Main Dish/Entrée	32.3	9.9	50.2	7.6	14,942	1,482
Bread/Grain Items	30.1	11.4	51.0	7.5	14,928	1,480
Salad/Raw Vegetables	62.4	10.1	20.9	6.6	14,920	1,480
Cooked Vegetables	65.0	6.1	22.8	6.1	14,919	1,481
Fruit	45.1	13.1	35.6	6.3	14,875	1,478
Desserts	4.3	8.9	65.0	21.7	14,831	1,473
Other	0.4	0.7	39.8	59.2	13,592	1,353
SY 2013–14						
Food	Percentage of SFAs that reported:				Total SFAs	
	Students Waste More	Students Waste Less	No Change	Don't Know	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>2</sup>
Fluid Milk	13.0	6.5	75.2	5.3	15,007	1,583
Main Dish/Entrée <sup>3</sup>	40.2	9.5	44.6	5.8	14,888	1,572
Bread/Grain Items <sup>3</sup>	48.5	10.1	35.8	5.5	14,926	1,576
Salad/Raw Vegetables	61.1	12.9	21.7	4.3	15,009	1,582
Cooked Vegetables	62.9	6.1	26.4	4.7	15,001	1,579
Fruit	47.4	15.2	32.9	4.5	14,978	1,578
Desserts	3.7	10.0	64.2	22.1	14,211	1,499
Other <sup>3</sup>	5.9	0.6	31.1	62.5	3,789	383

<sup>1</sup> *n* is less than 1,491 due to item nonresponse.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

<sup>3</sup> Observed changes in plate waste differ significantly between SY 2012–13 and SY 2013–14.

**Note:** Percentages add up to 100 percent horizontally. Each row is a different item in the survey.

**Source:** SFA Director Survey SY 2012–13, question 5.3; SFA Director Survey SY 2013–14, question 5.2.

For most types of food, there was no change between SY 2012–13 and SY 2013–14 in SFA directors' perceptions about changes in plate waste since implementation of the updated meal requirements (TABLE 5.14). However, for both main dish/entrée items and bread/grain items, the percentage of SFA directors that reported that students are wasting more increased between the two school years—from 32 percent to 40 percent for main dish/entrée items and from 30 to 49 percent for bread/grain items. The survey question did not differentiate between breakfast and lunch, so it is not possible to determine whether this change is associated with implementation of the updated requirements for breakfast, which were not in place in SY 2012–13; deterioration of students' acceptance of lunch items; or both. It

is also true that the weekly limits on grains and meat/meat alternates were lifted during this period, which may have resulted in an increase in servings of these foods and, hence, an associated increase in waste.

Among SFA directors who reported a change in plate waste in SY 2013–14, the vast majority (84 percent) attributed the change to updated food items being served (TABLE 5.15). Substantially smaller proportions attributed the perceived change in waste to the amount of food served (45 percent), the use of different preparation methods (30 percent), or the amount of time students have to eat (15 percent). Ten percent of SFAs reported that changes in plate waste were attributable to students having to take a fruit or vegetable item at lunch.<sup>58</sup>

TABLE 5.15 *Percentage of SFAs Indicating Particular Reasons for Observed Change in Plate Waste, SY 2013–14*

Reason for change in Plate Waste	SY 2013–14		
	Percent	Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>
Serving New Food Items	83.8	12,646	1,373
Amount of Food Served	45.4	12,371	1,350
Using Different Preparation Methods	30.2	12,218	1,339
Amount of Time Available to Eat	15.4	12,386	1,352
Other <sup>2</sup>	29.0	13,153	1,426
Students Required to Take Vegetable or Fruit Items	9.5	13,153	1,426
Students Do Not Like/Accept New Program Food Items	7.2	13,153	1,426
Students Do Not Like Whole-Grain Foods	5.3	13,153	1,426
Students Are Required to Take Program Foods that They Do Not Want	3.8	13,153	1,426
Students Do Not Like Foods with Less Salt	0.7	13,153	1,426

<sup>1</sup> Of the 1,426 that reported observing changes in plate waste.

<sup>2</sup> “Other” was a free-form category for survey respondents in the SY 2013–14 surveys to indicate miscellaneous reasons for plate waste.

**Note:** SFAs could select more than one reason, so the percentages will not add up to 100 percent.

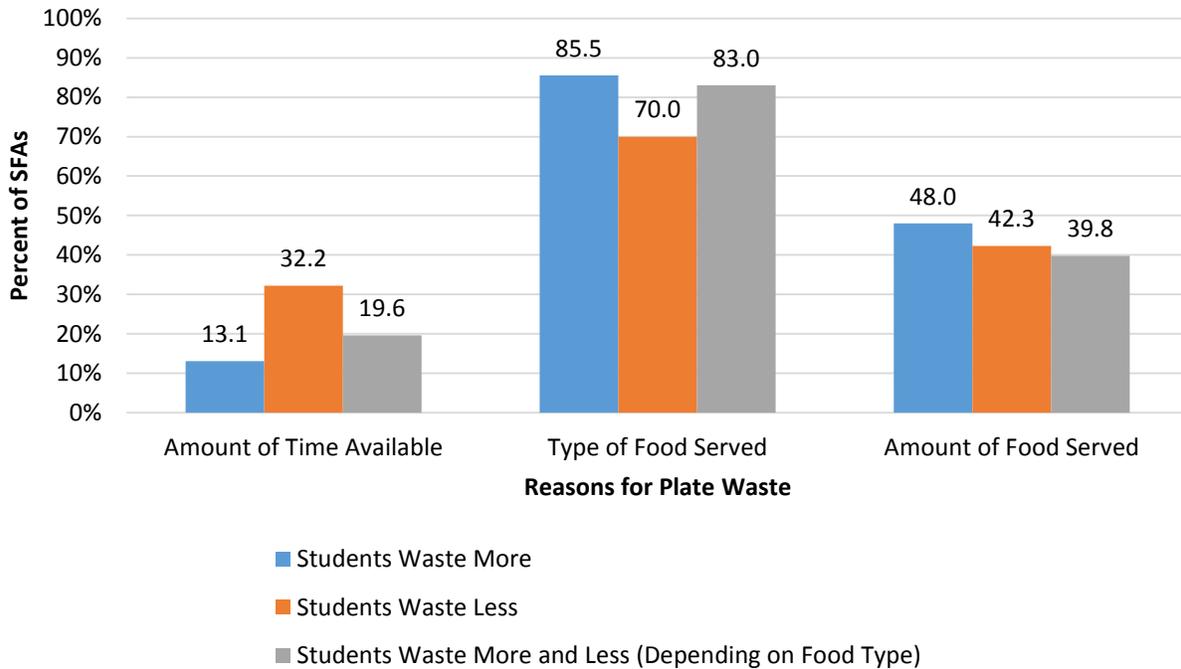
**Source:** SFA Director Survey SY 2013–14, question 5.3.

In addition to examining patterns in reported plate waste changes by type of food, responses were examined across all food types for each SFA to establish an overall measure of plate waste. Looking across all food types, responses indicating that students wasted more for at least one food type and did not waste less for any food type were classified as “students waste more;” responses indicating that students wasted less for at least one food type and did not waste more for any food type were classified as “students waste less;” and responses indicating that students wasted more for at least one food type

<sup>58</sup> The survey question that asks about reasons for changes in plate waste was different in the SY 2012–13 and SY 2013–14 surveys (the latter survey presented more response options). For this reason, comparisons across survey years must be made with caution. Findings were compared for the two response options that were identical in the two surveys—“the amount of time available to eat” and “the amount of food served”—and the differences were not statistically significant.

and that students wasted less for another food type were classified as “students waste more and less (depending on type of food).” Perceived increases in plate waste were largely due to the type of food served: 86 percent of SFAs that reported a change in plate waste cited the type of food served as the reason for the increase (FIGURE 5.9). However, the type of food served was also the main reason for decreases in plate waste (70 percent of SFAs that reported changes).

FIGURE 5.9 *Among SFAs That Reported Changes in Plate Waste, the Percentage of SFAs That Reported Various Reasons for the Plate Waste, SY 2013–14*



Source: SFA Director Survey SY 2013–14, questions 5.2 and 5.3.

## 6 Smarter Lunchrooms

### 6.1 Background

Derived from research in behavioral economics, the Smarter Lunchrooms movement is a grassroots initiative that encourages schools to implement evidence-based low- or no-cost strategies aimed at “nudging” children to make healthier choices when selecting foods for lunch. The Smarter Lunchrooms initiative supports the NSLP in promoting healthy food choice selection and student participation. Since 2009, the Smarter Lunchrooms Movement has been closely associated with research activities conducted at the Cornell Center for Behavioral Economics in Child Nutrition Programs (BEN) at Cornell University.<sup>59</sup> BEN provides several tools and training tips to help SFAs implement Smarter Lunchrooms strategies, including a scorecard for evaluating lunchroom performance.

FNS expressed interest in determining SFAs’ awareness of Smarter Lunchrooms strategies and the extent to which these strategies are implemented in schools. Questions on the 2013–14 SFA Director Survey (SN-OPS, SY 2013–14 SFA Director Survey) regarding Smarter Lunchroom strategies were informed by BEN’s Best Practices Web site,<sup>60</sup> and by the concepts illustrated in a summary graphic, titled “Lunch Line Redesign,” which was published in the *New York Times*.<sup>61</sup> These SY 2013–14 SFA Director Survey questions aimed to capture information regarding the following five main strategies to promote and to gauge the success of the Smarter Lunchrooms initiative:

1. Encourage fruit consumption
2. Encourage vegetable consumption
3. Encourage consumption of the targeted healthy entrée
4. Encourage consumption of white/plain milk
5. Encourage consumption of reimbursable meals

Although the SY 2013–14 SFA Director Survey was created before the first Smarter Lunchrooms scorecard was available,<sup>62</sup> SFAs would have been able to use similar tools and information available from BEN at that time to aid in their responses; as BEN continues to assimilate information from other studies conducted around the world, the current scorecard is updated to include more strategies than were included in the SY 2013–14 SFA Director Survey.

<sup>59</sup> For additional information, see the Cornell Center for Behavioral Economics in Child Nutrition Program’s Web site at <http://ben.cornell.edu/index.html>.

<sup>60</sup> Cornell Center for Behavioral Economics in Child Nutrition Program. N.D. “Our Ideas.” Smarter Lunchrooms Movement Web site. Accessed January 29, 2016. <http://smarterlunchrooms.org/ideas>.

<sup>61</sup> Wansink, Brian, David R. Just, and Joe McKendry. 2010. “Lunch Line Redesign.” *New York Times*, October 21, 2010. [http://www.nytimes.com/interactive/2010/10/21/opinion/20101021\\_Oplunch.html?\\_r=0](http://www.nytimes.com/interactive/2010/10/21/opinion/20101021_Oplunch.html?_r=0). (Note: A non-interactive version of the graphic is also available at the BEN Web site at <http://ben.cornell.edu/pdfs/LunchLineREdesignGraphicRedesign.pdf>).

<sup>62</sup> Cornell Center for Behavioral Economics in Child Nutrition Program. 2014. “Smarter Lunchrooms Self-Assessment.” Smarter Lunchrooms Movement Web site. Accessed January 29, 2016. [http://smarterlunchrooms.org/sites/default/files/lunchroom\\_self-assessmt\\_score\\_card.final\\_4-3-14.pdf](http://smarterlunchrooms.org/sites/default/files/lunchroom_self-assessmt_score_card.final_4-3-14.pdf).

## 6.2 Research Questions

The data presented in this chapter address the following research questions:

- What percentage of SFA directors have heard of the Smarter Lunchrooms Movement?
- What percentage of SFAs have staff who have received training on Smarter Lunchrooms strategies? What types of training have staff received?
- How many schools used at least one Smarter Lunchrooms strategy in SY 2013–14? How does this compare to SY 2012–13?
- What percentage of schools used specific Smarter Lunchrooms strategies in SY 2013–14?

In addition to the questions above, this chapter examines the number of schools that use at least one strategy from all five strategy groups.

## 6.3 Results

### 6.3.1 Awareness and Training

More than half (56 percent) of all SFAs reported awareness of the Smarter Lunchrooms Movement in SY 2013–14 (TABLE 6.1). Among SFAs that knew of the movement, 34 percent reported that staff (the SFA director or other staff) had received training on Smarter Lunchrooms strategies.

Overall, both awareness of the Smarter Lunchrooms Movement and participation in training increased with SFA size, and varied by urbanicity and poverty level as well. Significantly higher levels of awareness were associated with SFAs in suburban areas (68 percent) than SFAs located in cities, towns, or rural areas (59, 54, and 55 percent, respectively). SFAs in high poverty areas displayed lower levels of awareness than SFAs in low poverty areas (49 to 65 percent, respectively).

TABLE 6.1 *Awareness and Training Regarding the Smarter Lunchrooms Movement, as Reported by SFAs, SY 2013–14*

	Percent Aware of the Smarter Lunchrooms Movement	Wgtd <i>n</i>	Unwgtd <i>n</i>	Percent with Staff Trained in Smarter Lunchrooms Strategies	Wgtd <i>n</i>	Unwgtd <i>n</i>
All SFAs	56.2	14,663	1,553	34.4	8,176 <sup>a</sup>	963
<b>SFA size</b> <sup>1,2</sup>						
Small (1–999)	48.9	7,605	369	30.5	3,676	179
Medium (1,000–4,999)	61.7	5,162	591	33.6	3,169	363
Large (5,000–24,999)	70.5	1,607	403	46.2	1,124	283
Very Large (25,000+)	71.9	288	190	51.6	207	138
<b>Urbanicity</b> <sup>1</sup>						
City	58.9	1,372	262	43.8	808	186
Suburban	67.7	2,616	417	41.0	1,754	299
Town	54.4	2,619	284	30.3	1,425	160
Rural	54.9	7,036	531	32.5	3,810	297
<b>Poverty Level</b> <sup>1</sup>						
Low (0–29 percent F/RP)	64.5	2,984	345	39.0	1,908	244
Medium (30–59 percent F/RP)	58.0	6,770	714	33.9	3,875	442
High (60 percent or more F/RP)	48.7	4,909	494	31.4	2,392	277

<sup>1</sup> Awareness of the Smarter Lunchrooms Movement differed significantly by SFA size, urbanicity, and poverty level.

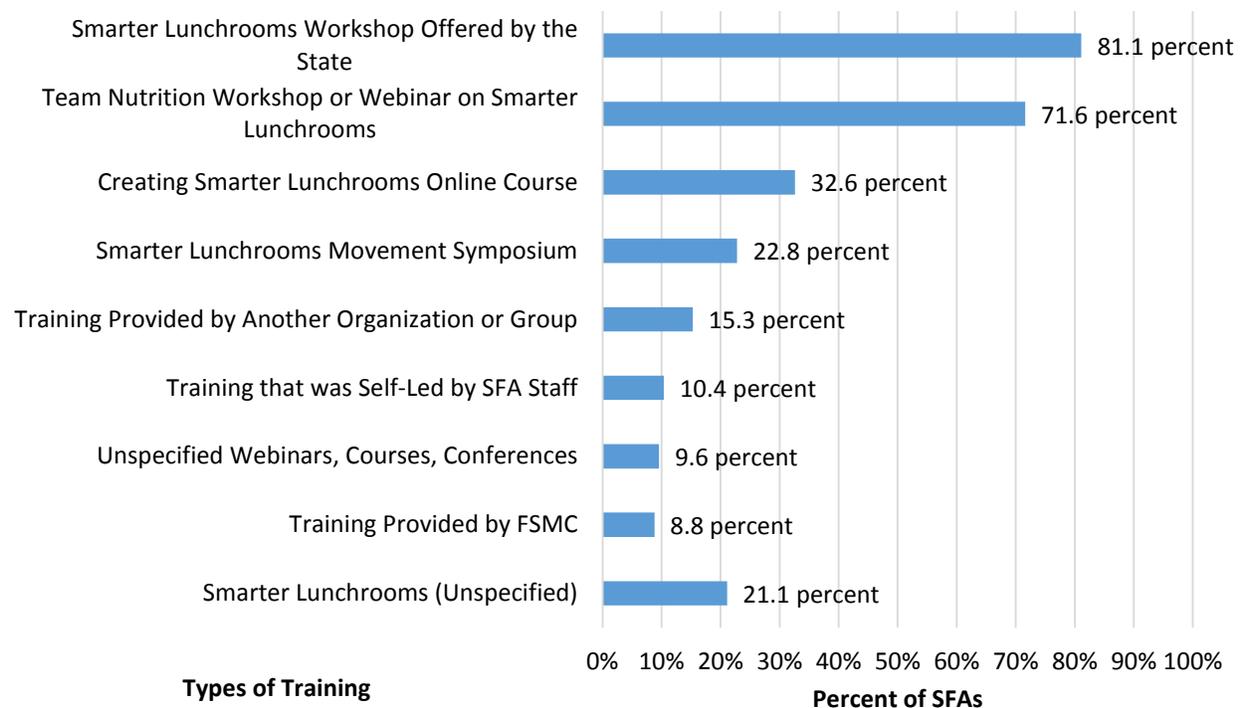
<sup>2</sup> The prevalence of staff that had training in Smarter Lunchrooms strategies differed significantly by SFA size.

<sup>a</sup> Based on 963 (8,176 weighted) SFAs that were aware of the Smarter Lunchrooms Movement.

**Source:** SFA Director Survey SY 2013–14, questions 10.1 and 10.2.

FIGURE 6.1 shows that most SFAs with staff who conducted self-led training used Smarter Lunchrooms workshops offered by the State (81 percent), followed by Team Nutrition workshops or Webinars (72 percent). Fewer SFAs reported that staff completed BEN's online course on creating Smarter Lunchrooms (33 percent) or attended a symposium sponsored by the Smarter Lunchrooms Movement (23 percent). Almost two-thirds (65 percent) of respondents reported other types of training. Appendix TABLE D.15 shows the other types of Smarter Lunchrooms training received by CN staff. Of the SFAs reporting other types of training, 15 percent reported utilizing another organization, while 10 percent specified self-led training by SFA staff. Ten percent used Webinars, courses, or conferences for training, and 9 percent used foodservice management companies (FSMCs).

FIGURE 6.1 *Types of Training in Smarter Lunchrooms Strategies Among SFAs With Staff Who Have Received Self-Led Training*



**Note:** 387 SFAs were aware of the Smarter Lunchrooms strategies and had received training on Smarter Lunchrooms strategies. FSMC=Food Service Management Company.

**Source:** SFA Director Survey SY 2013–14, question 10.2a.

### 6.3.2 Use of Smarter Lunchrooms Strategies

Smarter Lunchrooms strategies aim to encourage consumption behavior in five categories, including consumption of (1) fruit, (2) vegetables, (3) healthy entrées, (4) white/plain (unflavored) low-fat milk, and (5) reimbursable meals. The SY 2013–14 SFA Director Survey asked SFA directors to report whether all, some, or none of their schools used each strategy from each category. Data analysis focused first on

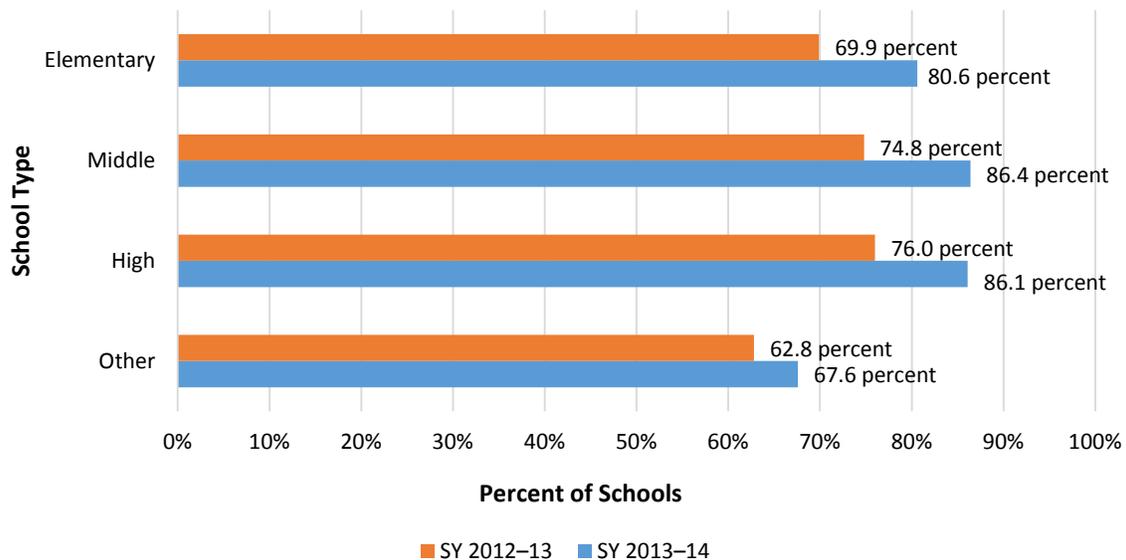
general implementation—the use of one or more strategies within each category—and then on the frequency with which specific strategies were used.

### Overview of Implementation of Smarter Lunchrooms Strategies

In SY 2013-14, more than 80 percent of all SFAs implemented at least one Smarter Lunchrooms strategy in elementary, middle, and high schools (FIGURE 6.2). SFAs reported using fewer Smarter Lunchrooms strategies in other types of schools (68 percent). A potential explanation of this may be that since other schools include preschools or kindergarten-only schools, where students are typically offered fewer choices about what to eat for lunch, children may have fewer opportunities to offer resistance to healthy foods.

SFA directors also provided information on the number of schools that implemented at least one Smarter Lunchrooms strategy in SY 2012–13. Based on these data, the percentage of schools at all grade levels using at least one Smarter Lunchrooms strategy increased significantly between SY 2012–13 and SY 2013–14. For instance, FIGURE 6.2 shows that in SY 2012–13, only 75 percent of middle schools and 76 percent of high schools reported the implementation of at least one Smarter Lunchrooms strategy; in SY 2013–14, the percent of SFAs using at least one strategy increased in these grade levels to 86 percent.

FIGURE 6.2 *Percentage of Schools Using at Least One Smarter Lunchrooms Strategy in SY 2012–13 and SY 2013–14, as Reported by SFA*



**Note:** Percentage of schools utilizing at least one Smarter Lunchrooms strategy differed significantly for each grade level between SY 2012–13 and SY 2013–14.

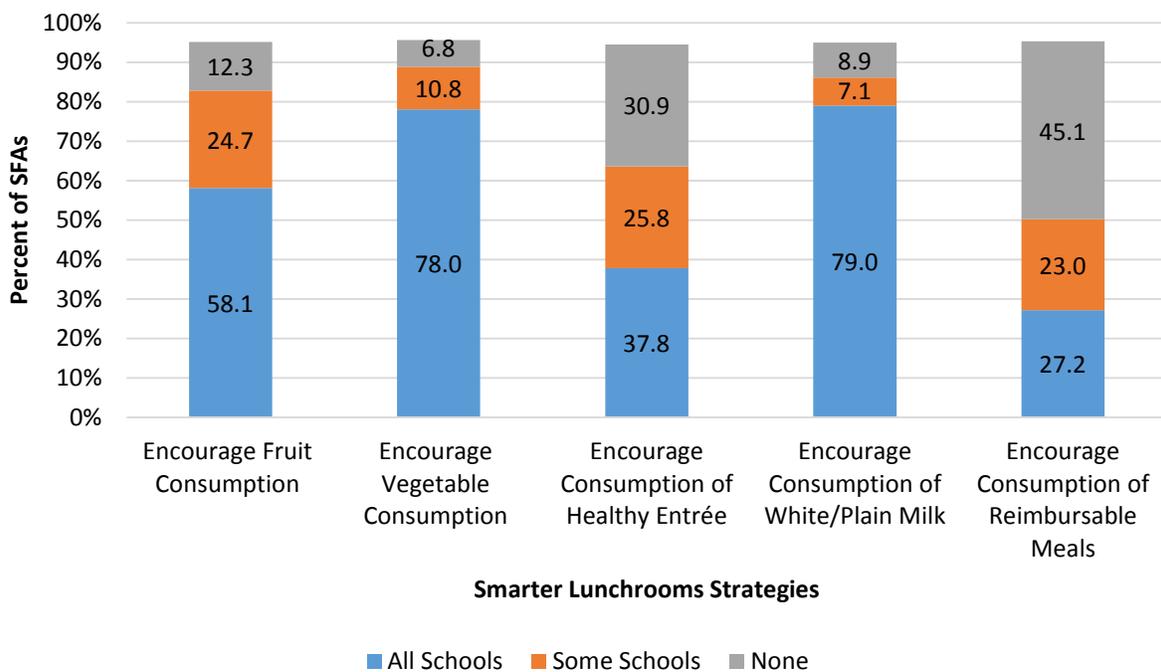
**Source:** SFA Director Survey SY 2013–14, question 10.4.

A higher percentage of SFAs reported implementing strategies that targeted the consumption of vegetables and white/plain milk versus other strategies in all schools in SY 2013–14 (FIGURE 6.3). Approximately 80 percent of SFAs reported that all their schools were implementing at least one

Smarter Lunchrooms strategy to target these behaviors, while less than 10 percent of SFAs indicated that none of their schools were implementing any strategies in these consumption areas.

Almost 60 percent of SFAs reported the implementation of Smarter Lunchrooms strategies that targeted fruit consumption in all schools, and an additional 25 percent implemented at least one such strategy in some schools. Fewer SFAs reported the universal implementation of strategies that focus on consumption of targeted healthy entrées or reimbursable meals; 31 and 45 percent of SFAs, respectively, reported that none of their schools were implementing Smarter Lunchrooms strategies that targeted these behaviors. Appendix TABLE D.16 provides estimates of the total number of schools included implementing strategies in each category shown in FIGURE 6.3.

FIGURE 6.3 *Percentage of SFAs Implementing at Least One Smarter Lunchrooms Strategy in All, Some, or None of Their Schools, by Strategy Category*



**Note:** SFAs had the option to report that no schools had facilities to implement strategies to encourage reimbursable meals; hence, the category bars do not reach 100 percent.

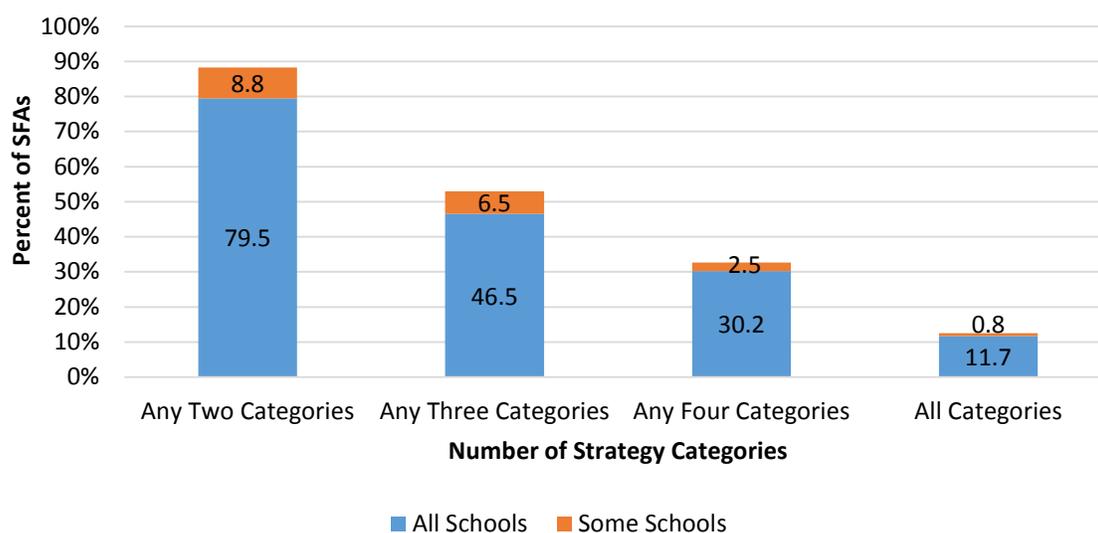
**Source:** SFA Director Survey SY 2013–14, question 10.3.

FIGURE 6.3 shows the percentage of SFAs that used strategies aimed at two or more of the five targeted groups. Eighty percent of SFAs reported that all schools used at least one strategy in two different Smarter Lunchrooms target groups, and nearly half of SFAs reported using at least one strategy in three different consumption categories in all schools.

Just under one-third of SFAs reported that all their schools used at least one strategy in any four of the consumption categories, while fewer SFAs reported that all schools implemented strategies pertaining

to all consumption categories. As presented in FIGURE 6.4, substantially fewer SFAs reported having some of their schools use strategies in two or more categories. Only 9 percent of SFAs reported that only some schools used strategies within two target categories, and 7 percent and 3 percent of SFAs reported that only some of their schools implemented strategies in three or four target groups, respectively. Less than 1 percent of SFAs reported having only some schools use strategies in all five targets. Overall, nearly 90 percent of SFAs reported all or some of their schools using strategies in least two categories, and nearly 12 percent of all SFAs reported that all schools implemented strategies in all five categories.

FIGURE 6.4 *Percentage of SFAs With All or Some of Their Schools Using Smarter Lunchrooms Strategies in Two or More Categories*



**Source:** SFA Director Survey SY 2013–14, question 10.3.

TABLE 6.2 shows the estimated number of schools that used at least one strategy in multiple strategy categories. SFAs implementing strategies in all schools reported an estimated 78,721 schools that used at least one strategy in any two categories; for SFAs reporting that only some of their schools implemented strategies in any two categories, this estimate was 7,836 schools. From these data, the national point estimate of the number of schools utilizing at least one strategy in any two different categories is between 78,721 and 86,557. For context, there were approximately 93,000 public schools participating in the NSLP during SY 2013–14.<sup>63</sup>

Similarly, the estimated number of schools that implemented strategies from any three categories was between 40,001 and 47,184, from any four categories was between 24,486 and 27,517, and from all categories was between 9,775 and 10,708 schools. Appendix TABLE D.16 presents these estimated numbers of schools by SFA size category.

<sup>63</sup> Data obtained from the FNS Summary Verification Report data file for 2013–14.

TABLE 6.2 *Percentage of SFAs Reporting That All/Some of Their Schools Used at Least One Smarter Lunchrooms Strategy in Multiple Strategy Categories and Estimated Number of Schools, SY 2013–14*

Strategy Categories	All schools		Some schools	
	Percent of SFAs	Estimated Number of Schools	Percent of SFAs	Estimated Number of Schools
Any Two Categories <sup>1</sup>	79.5	78,721	8.8	7,836
Any Three Categories <sup>2</sup>	46.5	40,001	6.5	7,183
Any Four Categories <sup>3</sup>	30.2	24,486	2.5	3,031
All Categories <sup>4</sup>	11.7	9,755	0.8	953

<sup>1</sup> SFAs reporting that all/some/none of their schools implemented at least one strategy from two different strategy categories.

<sup>2</sup> SFAs reporting that all/some/none of their schools implemented at least one strategy from three different strategy categories.

<sup>3</sup> SFAs reporting that all/some/none of their schools implemented at least one strategy from four different strategy categories.

<sup>4</sup> SFAs reporting that all/some/none of their schools implemented at least one strategy from five different strategy categories.

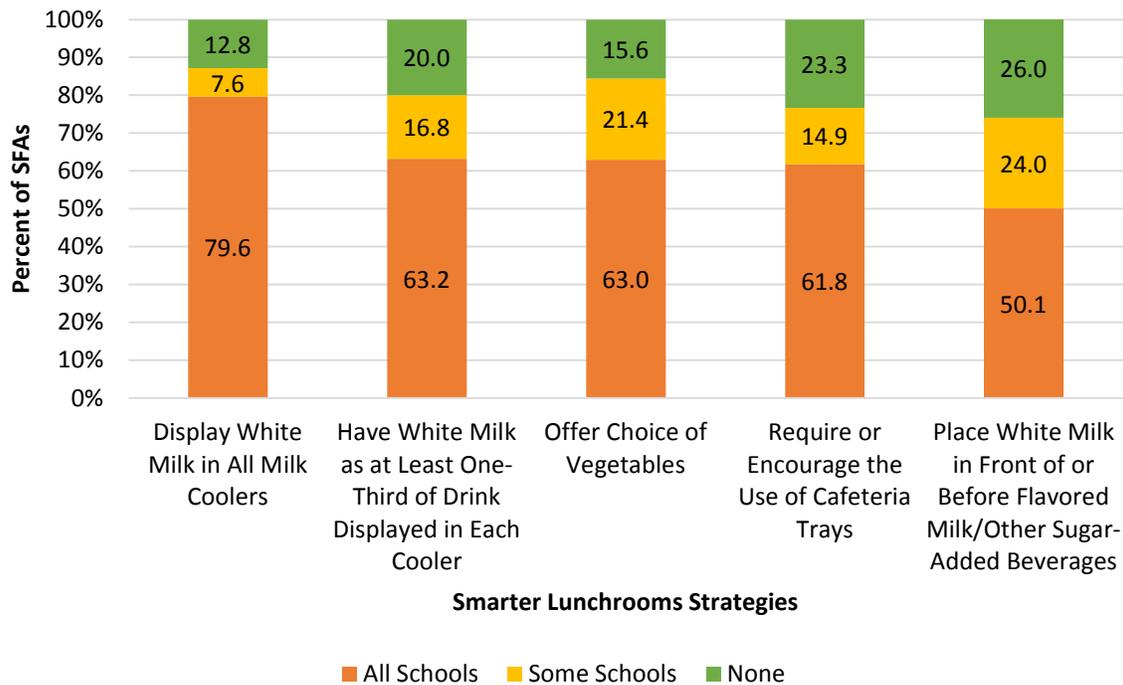
**Source:** SFA Director Survey SY 2013–14, question 10.3.

### *Implementation of Specific Smarter Lunchroom Strategies*

Of all the specific Smarter Lunchrooms strategies reported by SFAs in the SN-OPS, SY 2013–14 SFA Director Survey, the strategies most commonly implemented in all schools in an SFA focused on encouraging the consumption of white/plain milk and vegetables (FIGURE 6.5). This is consistent with findings reported in FIGURE 6.3.

FIGURE 6.5 shows the top three strategies used to encourage the consumption of white/plain milk: displaying white milk in all milk coolers (80 percent of SFAs implemented this strategy in all of their schools), having white/plain milk account for at least one-third of the drinks displayed in each cooler (63 percent), and placing white/plain milk in front of or before flavored milk or other sugar-added beverages (50 percent). Strategies for encouraging vegetable consumption included offering a choice of vegetables (63 percent) and encouraging or requiring the use of cafeteria trays (62 percent).<sup>64</sup>

<sup>64</sup> Cornell researchers found that removing trays from dining facilities decreased the percentage of diners who took salad by 65.2 percent, but did not decrease the percentage who took dessert, resulting in a higher ratio of dessert to salad. See Wansink, Brian and David Just. 2015. "Trayless cafeterias lead diners to take less salad and relatively more dessert." *Public Health Nutrition* 18: 1535-1536.

FIGURE 6.5 *Top Five Smarter Lunchrooms Strategies Used By SFAs*

Source: SFA Director Survey SY 2013–14, question 10.3.

TABLE 6.3 provides detailed results for all the Smarter Lunchrooms strategies assessed in the SN-OPS, SY 2013–14 SFA Director Survey, excluding strategies that target consumption of reimbursable meals (detailed results for these strategies are summarized in TABLE 6.4). Few SFAs reported that they implemented strategies outside the top five for all schools.

More than 40 percent of SFAs reported that only three strategies were implemented in all schools. These included displaying whole fruit (48 percent of SFAs implemented this strategy in all of their schools), using signs or prompts to draw attention to fruits (42 percent), and offering salads or a salad bar (42 percent). Four other strategies were implemented in all schools by about one-third of all SFAs, and included making the entrée with the greatest nutrient density the first or most prominent on the line (33 percent), displaying fruit in more than one location (30 percent), displaying fruit near the register (29 percent), and using attractive bowls to display fruit (28 percent).

The least frequently implemented strategies, based on the percentage of SFAs reporting that none of their schools implemented the strategy, included displaying creative names for vegetables outside the cafeteria (74 percent of SFAs indicated that none of their schools used this strategy), creating a student committee for naming and creating signage for vegetables (91 percent), giving vegetables creative names (61 percent), displaying creative names for targeted entrées near the entrées on the serving line (61 percent), moving the salad bar away from the wall and in front of the cash register (60 percent), and displaying creative names for targeted entrées on a poster or menu board outside the cafeteria (59 percent).

TABLE 6.3 *Percentage of SFAs Reporting Their Schools' Use of Smarter Lunchrooms Strategies During SY 2013–14*

Strategies	Schools Implementing			Wgtd (Unwgt <sup>1</sup> ) n
	None	Some	All	
<b>Strategies to Encourage Fruit Consumption</b>				
Use Additional Signs or Verbal Prompts to Draw Attention to Fruit and Encourage Students to Take Some	26.5	31.6	41.9	14,021 (1,505)
Display Fruit in Two or More Locations	40.1	30.3	29.5	13,951 (1,503)
Display the Whole Fruit	21.8	30.0	48.2	14,139 (1,521)
Use Attractive Bowls to Display Fruit Rather Than Stainless Steel Pans	44.2	27.8	28.1	13,885 (1,499)
Display Fruit Near the Register	39.9	31.4	28.7	13,935 (1,495)
<b>Strategies to Encourage Vegetable Consumption</b>				
Offer Choice of Vegetables	15.6	21.4	63.0	14,377 (1,537)
Give Vegetables Creative Names	60.5	25.8	13.7	14,088 (1,509)
Create a Student Committee Responsible for the Naming of and Creating Signage for Vegetables	91.0	6.3	2.7	13,949 (1,503)
Display Creative Names for Vegetables on a Poster or Menu Board Outside the Cafeteria	73.9	17.8	8.4	14,013 (1,505)
Offer a Salad/Salad Bar	29.8	28.4	41.8	14,264 (1,528)
Move Salad Bar Away from Wall, in Front of Cash Register	60.3	18.1	21.6	13,898 (1,489)
Require or Encourage the Use of Cafeteria Trays	23.3	14.9	61.8	14,162 (1,511)
<b>Strategies to Encourage Consumption of the Healthy Entrée</b>				
Display Creative Names for Targeted Entrées Near Entrées on the Serving Line	60.6	26.4	13.0	14,128 (1,518)
Display Creative Names of Targeted Entrées on a Poster or Menu Board Outside the Cafeteria	59.2	25.3	15.5	14,139 (1,519)
Make the Entrée With the Greatest Nutrient Density the First or Most Prominent on the Line	43.3	24.0	32.7	14,199 (1,522)
<b>Strategies to Encourage Consumption of White/Plain Milk</b>				
Display White Milk in All Milk Coolers	12.8	7.6	79.6	14,277 (1,528)
Have White Milk as at Least One-Third of Drink Displayed in Each Cooler	20.0	16.8	63.2	14,189 (1,521)
Place White Milk in Front of or Before Flavored Milk/Other Sugar-Added Beverages	26.0	24.0	50.1	14,138 (1,518)

<sup>1</sup> n is less than 1,598 due to item non-response.

**Note:** The percentage of SFAs who reported that none of their schools implemented an Encourage Fruit Consumption, Strategies to Encourage Vegetable Consumption, Strategies to Encourage Consumption of the Healthy Entrée, or Strategies to Encourage Consumption of White/Plain Milk.

**Source:** SFA Director Survey SY 2013–14, question 10.3.

TABLE 6.4 shows that fewer SFAs (less than 20 percent) implemented any strategies to encourage the consumption of reimbursable meals in all or some of their schools. The two most frequently implemented strategies in this category (based on the percentage of SFAs implementing the strategy in some or all of their schools) included moving all competitive foods behind the serving counter in the regular lunch line (36 percent of SFAs implemented this strategy in some or all of their schools) and making all competitive foods in the regular lunch line available by request only (27 percent implemented this strategy in some or all of their schools).

Results presented in TABLE 6.4 may suggest that strategies designed to encourage the consumption of reimbursable meals are tied less to consumption behavior and more to the characteristics of individual schools. For example, the availability of competitive foods, or equipment and space for offering “grab-and-go” meals, may vary across SFAs.

There is evidence that even SFAs that were unaware of the Smarter Lunchrooms Movement use Smarter Lunchroom strategies. As seen in TABLE 6.5, those that were unaware of the movement indicated high usage of strategies to encourage consumption of fruit, vegetables, and milk. On the other hand, those that were aware of the movement reported even higher usage rates. TABLE 6.5 shows that the prevalence of smarter lunchroom strategies is generally high in our Nation’s schools.

TABLE 6.4 *Percentage of SFAs Reporting Their Schools’ Usage of Strategies to Encourage Consumption of a Reimbursable Meal during SY 2013–14*

Strategies	None	Some	All	N/A <sup>1</sup>	Wgtd (Unwgtd) n <sup>2</sup>
Create a Healthy-Items-Only Convenience Line or Window Stocked With: Milk, Fruits, Vegetables, Premade Sandwiches or Salad, and Lowest-Fat/Lowest-Sodium Entrée Items	41.4	15.0	8.21	35.4	14,239 (1,519)
Move All “Competitive Foods” (Chips, Cookies, etc.) Behind the Serving Counter in the Regular Lunch Line	27.9	17.8	18.1	36.2	14,115 (1,514)
Make All “Competitive Foods” in the Regular Lunch Line Available by Request Only	36.4	13.9	13.1	36.7	14,077 (1,511)
Place the Components of a Reimbursable Meal or a Reimbursable “Grab-And-Go” Bag at the Snack Window	38.4	13.0	5.9	42.8	14,100 (1,509)

<sup>1</sup> N/A: no schools in the SFA have facilities to implement this strategy.

<sup>2</sup> n is determined by multi-tiered answers to survey questions.

Source: SFA Director Survey SY 2013–14, question 10.3.

TABLE 6.5 *Percentage of SFAs Reporting That Some or All of Their Schools Implemented At Least One Smarter Lunchroom Strategy in SY 2013–14*

Smarter Lunchroom Strategy	SFAs Aware of the Smarter Lunchrooms Movement (Percent)	SFAs Unaware of the Smarter Lunchrooms Movement (Percent)	All SFAs (Percent)
Encourage Fruit Consumption	95.0 (69,959)	91.7 (25,460)	82.8 (96,168)
Encourage Vegetable Consumption	98.2 (71,084)	82.2 (28,120)	88.8 (99,907)
Encourage Consumption of the Healthy Entrée	76.8 (58,391)	50.1 (17,892)	63.6 (76,844)
Encourage Consumption of White/Plain Milk	94.6 (68,441)	80.4 (26,651)	86.0 (95,765)
Encourage Consumption of a Reimbursable Meal	59.1 (55,411)	42.2 (16,697)	50.2 (72,487)

**Note:** Number of schools represented in parentheses.

**Source:** SFA Director Survey SY 2013–14, questions 10.1 and 10.3.

## 7 SFA Operations

The NSLP and the SBP operate under Federal regulations and policies that are administered at the Federal level by FNS. State CN directors administer Federal policies at the State level, and are responsible for monitoring program operations of SFAs in their jurisdictions. Within these parameters, local SFAs and schools have considerable discretion in how they operate their programs. FNS makes technical assistance and guidance materials available to all SFAs, who also receive training and monitoring support from their State CN agencies. Understanding how school meal programs operate at the local level enables FNS to identify potential improvement areas for technical assistance, training programs, and educational materials to assist SFAs in effectively and efficiently operating school meal programs.

This chapter examines several aspects of local SFA operations, including the use of Food Service Management Companies (FSMCs) and cooperative purchasing agreements, operational issues related to use of USDA Foods and food safety, and participation in Farm to School activities. The data presented were collected from SFA directors and, in some instances, State CN directors. This section describes the prevalence of specific policies and practices, their variation across SFAs and States (where data are available), and changes over time.

### 7.1 Use of Food Service Management Companies and Cooperative Purchasing Agreements

#### 7.1.1 Background

Some school districts contract with FSMCs to manage their school foodservice operation or selected aspects of the operation—for example, menu development, meal preparation and service, bookkeeping, or maintenance of program documents.<sup>65</sup> FSMCs often prove to be beneficial, as they are sometimes able to operate food procurement operations more efficiently than self-operated SFAs as result of their increased purchasing power—particularly national and regional FSMCs—and FSMCs often lower personnel costs. In addition, SFAs may participate in cooperative purchasing groups, formed by a conglomerate of SFAs that purchases food items collectively rather than individually. Such collectives give SFAs more purchasing power, which helps lower prices and improve the quality of products and services. SFAs may also competitively procure the services of a group purchasing organization (GPO), which is organized by a third party to manage the issuance of sealed bids or competitive proposals, as well as to evaluate and score contract bids/proposals on behalf of SFAs.<sup>66</sup> When SFAs elect to competitively procure the services of a FSMC or enter into a cooperative purchasing agreement, SFAs may review the contracts or agreements to ensure that they comply with relevant Federal

---

<sup>65</sup> Arizona Department of Education. 2015. “Contracting With a Food Service Management Company (FSMC).” Accessed January 29, 2016. <http://www.azed.gov/health-nutrition/nslp/operate-nslp/fsmc/>.

<sup>66</sup> ChangeLab Solutions, the Alliance for a Healthier Generation, and NPLAN. N.D. “Power in Numbers: Group Purchasing for Healthier School Meals.” Accessed January 29, 2016. [https://schools.healthiergeneration.org/\\_asset/mf82gr/13-6263\\_GroupPurchSM.pdf](https://schools.healthiergeneration.org/_asset/mf82gr/13-6263_GroupPurchSM.pdf).

requirements. Some SAs may additionally require written approval before SFAs can begin soliciting services from FSMCs.<sup>67</sup>

### 7.1.2 Research Questions

This section uses data from both the CN Director Survey and the SFA Director Survey to address the following research questions:

- What proportion of SFAs are using an FSMC?
- Among SFAs that use FSMCs, what proportion use FSMCs that are national, regional, and local? Has this pattern changed over time?
- What proportion of SFAs use FSMCs or have a cooperative purchasing agreement to manage the procurement of USDA Foods and commercial foods?
- Do SFAs that use FSMCs or cooperative purchasing agreements to coordinate food purchases pay administrative fees to oversee the purchase of USDA Foods?
- How do SFAs oversee execution of FSMC contracts and cooperative purchasing agreements?
- What proportion of SFAs use an advisory council that provides input on ordering USDA Foods or other foods?
- Do States review FSMC contracts and cooperative purchasing agreements? If all such agreements are not reviewed, what circumstances trigger a review?
- Do States require use of prototype contracts or agreements?

### 7.1.3 Results

#### *Use of Food Service Management Companies*

In SY 2013–14, about 21 percent of SFA directors reported using FSMCs (data not shown). This percentage has remained stable since SY 2011–12. Similarly, there was little change in the types of SFAs that use FSMCs. In all three survey years, the use of FSMCs was lower among very large SFAs, rural SFAs, and medium-poverty SFAs, relative to large, more urban, and higher-poverty SFAs. Appendix TABLE D.22 and TABLE D.23 present the percentages of SFAs and schools that used FSMCs during SY 2013–14 by State.

In SY 2013–14, 2,972 SFAs used FSMCs, with most SFAs (60 percent) contracted with national companies (TABLE 7.1). Slightly more than one-quarter (28 percent) of SFAs that used FSMCs in SY 2013–14 contracted with regional companies, and 12 percent contracted with small companies. These findings are generally comparable to those observed in SY 2012–13.

As shown in TABLE 7.1, the apparent increase in SFAs using FSMCs since SY 2011–12 should be interpreted with caution due to the amount of missing information in SY 2011–12. Five States (9 percent of all State CN agencies) did not provide the requested data that year, compared to three States (5 percent) in SY 2013–14. Appendix TABLE D.20 provides estimates of the total number of schools served

<sup>67</sup> Institute of Child Nutrition (formerly National Food Service Management Institute). 2013. "Procurement in the 21st Century." Accessed January 29, 2016. <http://www.nfsmi.org/documentlibraryfiles/PDF/20130820034348.pdf>.

by various types of FSMCs. Overall, and when taking into consideration item non-response in SY 2011–12, both TABLE 7.1 and TABLE D.20 indicate that use of FSMCs was stable over the three years of SN-OPS.

TABLE 7.1 *Among SFAs That Used FSMCs, the Number and Percentage of SFAs That Used National, Regional, and Local FSMCs, as Reported by State CN Directors, SY 2011–12, SY 2012–13, and SY 2013–14*

Type of FSMC	SFAs					
	SY 2011–12		SY 2012–13		SY 2013–14	
	Number	Percent <sup>1</sup>	Number	Percent <sup>1</sup>	Number	Percent <sup>1</sup>
<b>National Companies</b>	1,365	50.6	1,649	57.0	1,783	60.0
Aramark	318	23.3	369	22.0	331	11.1
Chartwells	470	34.4	496	29.5	598	20.1
Preferred Meal System	91	6.7	163	9.7	192	6.5
Sodexo	391	28.7	405	24.1	415	14.0
Other National Companies	95	7.0	246	14.7	247	8.3
<b>Regional Companies</b>	713	26.4	864	29.3	841	28.3
<b>Local Companies</b>	619	22.9	401	13.6	348	11.7
Total SFAs	2,697		2,944		2,972	
Total States	<sup>a</sup> 49		<sup>a</sup> 52		55	

<sup>1</sup> Percentage of SFAs and schools do not add up to 100 percent due to multiple item response.

<sup>a</sup> *n* is less than 54 States due to item nonresponse.

**Source:** State CN Director Survey SY 2011–12, question D3; State CN Director Survey SY 2012–13, question C3; and State CN Director Survey SY 2013–14, question C8.

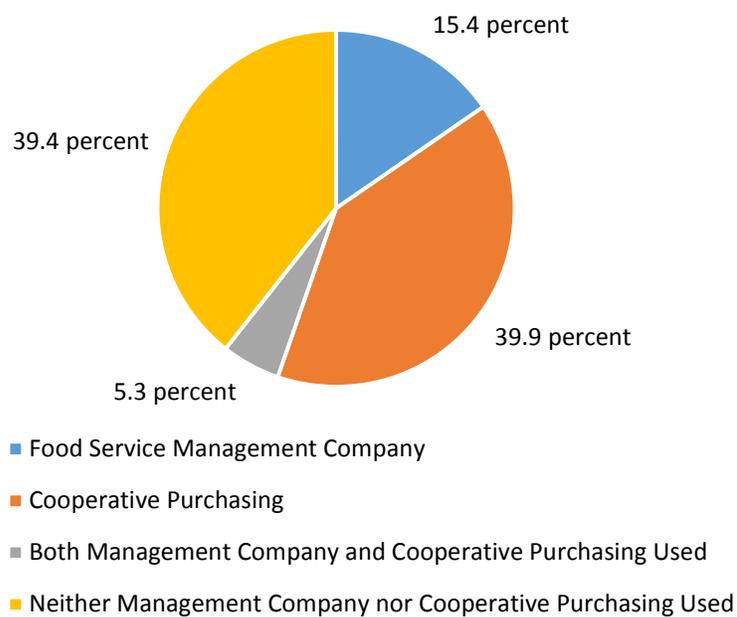
### Cooperative Purchasing Agreements

SFAs may competitively procure the services of FSMCs to manage program operations, or they may enter into State or local intergovernmental agreements (e.g., cooperative agreements) to competitively purchase goods and services. In SY 2013–14, 6 out of 10 SFAs used one or both of these contractual mechanisms to optimize their procurement process (FIGURE 7.1). Forty percent of SFAs used cooperative purchasing agreements, 15 percent used FSMCs, and 5 percent used both FSMCs and cooperative purchasing agreements.<sup>68</sup>

TABLE 7.2 shows that the use of these contractual arrangements varied significantly by SFA size, urbanicity, and poverty level. Cooperative agreements (only) were least common among small and very large SFAs, SFAs located in cities, and high-poverty SFAs. SFAs that were least likely to use either FSMCs or cooperative purchasing agreements included small and very large SFAs, SFAs located in cities and rural areas, and high-poverty SFAs.

<sup>68</sup> The use of FSMCs by SFAs is higher (22 percent) in States with prototype documents for executing FSMC contracts compared to the use (9 percent) in States without prototype documents. The availability of prototype documents is discussed below.

FIGURE 7.1 *Percentage of SFAs Using Food Service Management Companies and Cooperative Purchasing Agreements to Manage the Procurement of USDA Foods and Commercial Products, SY 2013–14*



Source: SFA Director Survey SY 2013–14, question 4.1.

TABLE 7.2 *Percentage of SFAs Using Food Service Management Companies and Cooperative Purchasing Agreements to Manage the Procurement of USDA Foods and Commercial Products, SY 2013–14*

	Percentage of SFAs				Wgtd <i>n</i>	Unwgt'd <i>n</i>
	Food Service Management Company	Cooperative Purchasing	Both Food Service Management Company and Cooperative Purchasing Used	Neither Food Service Management Company nor Cooperative Purchasing Used		
All SFAs	15.4	39.9	5.3	39.4	14,814	<sup>a</sup> 1,574
<b>SFA Size</b> <sup>1</sup>						
Small (1–999)	13.7	31.9	5.3	49.1	7,653	371
Medium (1,000–4,999)	17.3	48.6	5.7	28.4	5,233	601
Large (5,000–24,999)	17.9	49.5	5.0	27.6	1,638	410
Very Large (25,000+)	10.4	39.5	1.2	49.0	291	192
<b>Urbanicity</b> <sup>2</sup>						
City	24.1	29.2	2.9	43.9	1,346	265
Suburban	24.1	41.9	6.2	27.8	2,703	426
Town	17.4	45.4	4.5	32.7	2,615	285
Rural	9.8	42.4	5.0	42.8	7,091	537
<b>Poverty Level</b> <sup>3</sup>						
Low (0–29 percent F/RP)	22.4	42.5	5.7	29.5	3,033	354
Medium (30–59 percent F/RP)	15.3	43.4	4.3	36.9	6,833	718
High (60 percent or more F/RP)	11.1	33.5	6.5	48.9	4,948	502

<sup>1</sup> Percentage of SFAs that used foodservice management companies only, cooperative purchasing agreements only, both foodservice management companies and cooperative purchasing, and used neither foodservice management companies nor cooperative purchasing agreements size differed significantly by SFA size.

<sup>2</sup> Percentage of SFAs that used foodservice management companies only, cooperative purchasing agreements only, both foodservice management companies and cooperative purchasing, and used neither foodservice management companies nor cooperative purchasing agreements differed significantly by urbanicity.

<sup>3</sup> Percentage of SFAs that used foodservice management companies only, cooperative purchasing agreements only, both foodservice management companies and cooperative purchasing, and used neither foodservice management companies nor cooperative purchasing agreements differed significantly by poverty level.

<sup>a</sup> *n* is less than 1,598 due to item nonresponse.

**Source:** SFA Director Survey SY 2013–14, question 4.1.

SFAs that have FSMC contracts or cooperative agreements related to food procurement use a variety of mechanisms to oversee the contracts/agreements. Almost all SFAs regularly review invoices, and the vast majority provide regular feedback to the FSMC or cooperative. As seen in TABLE 7.3, 95 percent of the 975 SFAs (out of the 997 that reported using FSMCs and/or cooperatives) that responded to questions 4.2 and 4.3 of the SFA Director Survey regularly reviewed invoices. Similarly, 85 percent provide feedback to the FSMCs and cooperatives. Sixty-three percent of SFAs meet with vendors to

ensure that their preferences and needs are represented in purchasing decisions, and almost half (47 percent) of SFAs use an advisory council to provide feedback to the FSMC or cooperative.

TABLE 7.3 *Mechanisms Used to Oversee Contracts and Agreements Among SFAs That Use a Foodservice Management Company or Cooperative Purchasing, SY 2013–14*

Mechanism	Percentage of SFAs			Wgtd <i>n</i>	Unwgt'd <i>n</i> <sup>1</sup>
	Food Service Management Company	Cooperative Purchasing	Both FSMC and Cooperative Purchasing		
Reviews Invoices Regularly	22.9	63.8	7.9	8,594	975
Provides Feedback to Food Service Management Company or Cooperative	22.2	55.6	7.4	8,299	950
Uses Advisory Council to Provide Feedback	12.5	28.8	5.4	8,109	932
Meets With Vendors to Ensure Representation in Purchasing Decisions	7.4	49.2	6.0	8,143	935
Other	2.4	7.6	1.1	2,340	248

<sup>1</sup> 997 SFAs used either a foodservice management company or had a cooperative purchasing agreement.

**Notes:** SFAs could select none, one, or more than one mechanism.

**Source:** SFA Director Survey SY 2013–14, question 4.2 and 4.3.

All SFA directors (regardless of whether they used an FSMC or purchasing cooperative) were asked whether their SFA or cooperative had an advisory council that provides input on food procurement (USDA Foods or commercial foods). Program regulations require any SFA that employs a FSMC in operation of its nonprofit school foodservice to establish an advisory board composed of parents, teachers, and students to assist in menu planning.<sup>69</sup>

Overall, less than one-third of SFAs (31 percent) reported having an advisory council. In TABLE 7.4, 22 percent of the SFAs using only FSMCs reported that they used an advisory council; in contrast, 58 percent of SFAs that used cooperatives and 46 percent of SFAs that used both cooperatives and FSMCs reported that they used an advisory council. Even six percent of SFAs that do not use cooperatives and/or FSMCs reported using an advisory council. TABLE 7.5 indicates that the use of advisory councils to guide food procurement varied significantly by SFA size and urbanicity: small and rural SFAs were less likely to use advisory councils in this way than larger, more urban SFAs.

Among SFAs that used advisory councils to gather input on food procurement, 64 percent who used FSMCs stated that their advisory council gathered information from the SFA and, if applicable, from other SFAs to guide its recommendations (TABLE 7.4). For the SFAs that only used cooperatives, this measure was 85 percent, while for the SFAs using both FSMCs and cooperatives, 39 percent reported

<sup>69</sup> Subchapter A—Child Nutrition Program. 7 CFR §210-215. [http://www.fns.usda.gov/sites/default/files/7cfr210\\_13\\_1.pdf](http://www.fns.usda.gov/sites/default/files/7cfr210_13_1.pdf).

that their advisory councils gathered information to inform recommendations. Overall, approximately 78 percent of advisory councils gathered information to guide their recommendations (data not shown). Most advisory councils were not elected, although as seen in the last row of *TABLE 7.4*, elections were more prevalent in councils serving SFAs that only used cooperatives and SFAs that used neither FSMCs nor cooperatives. Most SFA directors did not report how long individual members served on the advisory council (whether elected or not).<sup>70</sup>

**TABLE 7.4** *SFA Use of Advisory Councils, Whether Advisory Councils Gather Information, and Whether Advisory Councils are Elected, SY 2013–14*

	Food Service Management Company			Cooperative Purchasing			Both FSMC and Cooperative Purchasing			Neither FSMC nor Cooperative Purchasing		
	Percent	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>	Percent	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>
Used Advisory Council	22.2	2,153	236	58.0	5,801	678	46.0	791	78	5.7	5,816	559
Among SFAs that Used an Advisory Council:												
Council Gathered Information to Inform Decision Making	64.3	451	58	84.6	3,338	420	38.5	338	36	65.0	333	49
Advisory Council was Elected	15.4	471	59	27.1	3,355	421	11.5	363	37	21.1	329	48

<sup>1</sup> *n* is determined by multi-tiered answers to survey questions.

**Source:** SFA Director Survey SY 2013–14, questions 4.1, 4.4, 4.4a, and 4.4b.

<sup>70</sup> Source: Question 4.4c, SFA Director Survey SY 2013–14.

TABLE 7.5 *Use of Advisory Councils to Guide Food Purchasing, by SFA Characteristics, SY 2013–14*

SFA Characteristics	Used an Advisory Council		Wgtd <i>n</i>	Unwgted <i>n</i>
	Yes	No		
All SFAs	31.0	69.0	14,708	<sup>a</sup> 1,563
<b>SFA Size<sup>1</sup></b>				
Small (1–999)	21.1	78.9	7,621	369
Medium (1,000–4,999)	40.7	59.3	5,160	593
Large (5,000–24,999)	45.4	54.6	1,637	410
Very Large (25,000+)	34.2	65.8	289	191
<b>Urbanicity<sup>2</sup></b>				
City	35.3	64.7	1,333	264
Suburban	37.2	62.8	2,703	425
Town	35.9	64.1	2,629	284
Rural	28.2	71.8	6,983	529
<b>Poverty Level</b>				
Low (0–29 percent F/RP)	32.2	67.9	2,991	351
Medium (30–59 percent F/RP)	34.1	65.9	6,758	712
High (60 percent or more F/RP)	26.0	74.0	4,960	500

<sup>1</sup> Percentage of SFAs that use advisory council to guide food differed significantly by SFA size.

<sup>2</sup> Percentage of SFAs that use advisory council to guide food differed significantly by urbanicity.

<sup>a</sup> *n* is less than 1,598 due to item nonresponse.

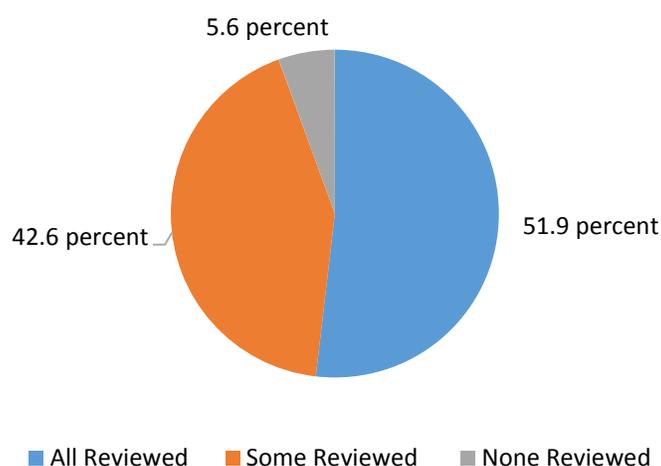
**Source:** SFA Director Survey SY 2013–14, question 4.4.

### State Oversight

State CN directors were asked whether their office reviewed FSMC contracts, cooperative purchasing agreements, or GPO contracts prior to their execution by SFAs. Program regulations require SAs to annually review each contract (including all supporting documentation) between any school food authority and FSMC to ensure compliance with all the program provisions and standards before the execution of the contract by either party. Additionally, if an SA provides a prototype contract to SFAs that fulfills program requirements, an annual review may be limited to changes made to the prototype contract.<sup>71</sup> Just over half of States (52 percent) reported that they reviewed all such agreements (FIGURE 7.2). Forty-three percent of States reported that they reviewed some agreements, and 6 percent of States (three States) reported that they did not review agreements prior to execution.

<sup>71</sup> Subchapter A—Child Nutrition Program. 7 CFR §210-215. [http://www.fns.usda.gov/sites/default/files/7cfr210\\_13\\_1.pdf](http://www.fns.usda.gov/sites/default/files/7cfr210_13_1.pdf).

FIGURE 7.2 *Percentage of States That Review SFA Cooperative Purchasing Agreements, GPO Contracts, and FSMC Contracts, SY 2013–14*



**Notes:** *n* is less than 54 due to item nonresponse.

**Source:** State CN Director Survey, SY 2013–14, questions C9.

Of the 43 percent of SAs that conditionally reviewed SFA contracts and agreements prior to execution, a variety of circumstances triggered a review. Most of these triggers were related to FSMC contracts rather than cooperative purchasing agreements or GPO contracts. All 23 of these SAs identified one or more factors that would trigger review of FSMC contracts, but only two identified factors that would trigger review of purchasing contracts or agreements (TABLE 7.6).

The dollar-value of an FSMC contract most commonly triggered a review. More than three-quarters (78 percent) of States that conditionally reviewed SFA contracts and agreements reviewed FSMC contracts that passed a given threshold for total value (TABLE 7.6). The length of the contract term, the use of a new vendor, or a specific issue related to an SFA's history triggered 74 percent of FSMC contract reviews.

Fifty-two percent of States that conditionally reviewed SFA contracts and agreements provided other reasons for review. Of those States, 31 percent stated that they always reviewed FSMC contracts, regardless of value or other contract terms. States that reported conditional review of cooperative purchasing agreements and GPO contracts cited similar triggers. In addition, two of these States indicated that the potential size of a co-op could trigger a review.

TABLE 7.6 *Circumstances That Triggered Review of Cooperative Purchasing Agreements, GPO Contracts, and FSMC Contracts, in States That Conditionally Reviewed These Agreements and Contracts, SY 2013–14*

Circumstances that Triggered State Review ( <i>n</i> =23) <sup>1</sup>	FSMC Contracts		Cooperative Purchasing Agreements and GPO Contracts	
	Number of State Agencies	Percentage	Number of State Agencies	Percentage
Dollar Value of Contract	18	78.3	1	4.3
Length of Contract Term	17	73.9	1	4.3
New Vendor	17	73.9	2	8.7
Potential Co-Op Size	1	4.3	2	8.7
SFA History	17	73.9	2	8.7
Other	12	52.2	1	4.3
All FSMC contracts are reviewed	7	30.5	N/A	N/A

<sup>1</sup> 23 States selected “Yes, some but not all are reviewed” in question C.9.

**Note:** N/A indicates not applicable.

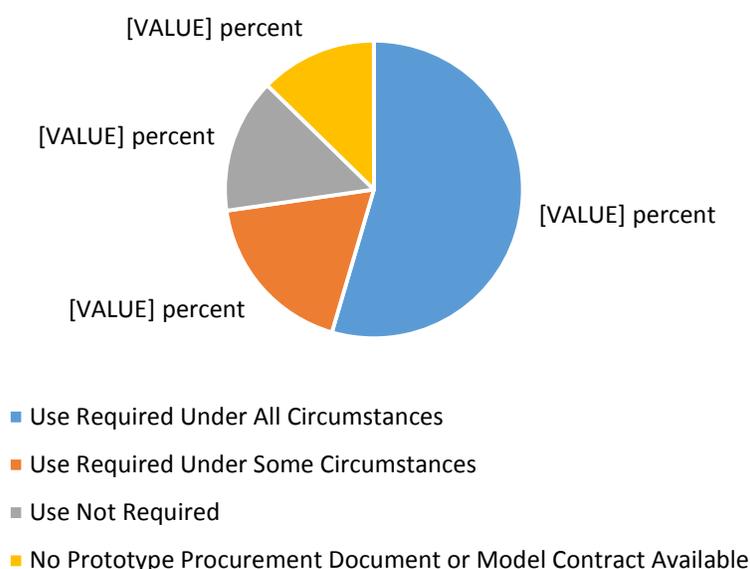
**Source:** State CN Director Survey, SY 2013–14, question C9a.

All State CN directors, regardless of their policies related to reviewing contracts and agreements prior to execution, were asked whether they had prototype or model documents that SFAs could use in setting up FSMC contracts, cooperative purchasing agreements, or GPO contracts. The data indicate that standardization of SFA contracts and agreements was uneven across and within States. More than half of States (55 percent) reported that they had prototype/model documents and that SFAs were required to use them under all circumstances (FIGURE 7.3). However, in the remaining 45 percent of States, prototype/model documents were not available or were not used consistently. Eighteen percent of States had prototype/model documents, but required SFAs to use them only under certain circumstances. The most frequently reported trigger for use of prototype/model documents was the dollar value of the contract.<sup>72</sup> Fifteen percent of States made prototype/model documents available, but did not require SFAs to use them. The remaining 13 percent of States did not have prototype/model documents for SFA contracts and agreements.<sup>73</sup>

<sup>72</sup> Source: Question C9a, State CN Director Survey, SY 2013–14.

<sup>73</sup> Because of rounding, the figures cited in the last three sentences of this paragraph do not add up to the 45 percent cited in the preceding sentence.

FIGURE 7.3 *State Requirements Related to Use of Prototype Contracts or Agreements for Food Service Management Companies, Group Purchasing Organizations, and Purchasing Cooperatives, SY 2013–14*



Source: State CN Director Survey SY 2013–14, question C10.

## 7.2 USDA Foods

### 7.2.1 Background

The USDA Foods program purchases nutritious agricultural products and makes them available to SFAs, simultaneously supporting the school meal programs and American agricultural producers. SFAs receive a prescribed cash value amount of these “entitlement” USDA Foods, based on the number of reimbursable lunches served in the prior school year and a per-meal cash value established every year based on changes in the Price Index of Foods Used in Schools and Institutions.<sup>74</sup> The national average of such donated food assistance to States is 22.75 cents per lunch served in the NSLP.<sup>75</sup> SFAs can also receive “bonus” USDA Foods, when available, through USDA’s price support and surplus removal programs. The USDA Foods program supports the updated meal requirements (previously discussed in Section 5) by providing an alternative source and greater variety of fruits, vegetables, and whole grain-

<sup>74</sup> USDA, FNS. 2012. “Food and Nutrition Service Food Distribution Fact Sheet. Schools/Child Nutrition: USDA Foods Programs.” Published in November. [http://www.fns.usda.gov/sites/default/files/pfs-schcnp\\_final\\_revised-11-26-12\(2\).pdf](http://www.fns.usda.gov/sites/default/files/pfs-schcnp_final_revised-11-26-12(2).pdf). Note: there is no separate entitlement associated with SBP meals; however, SFAs are free to use USDA Foods in either NSLP or SBP meals.

<sup>75</sup> USDA, FNS. “National Average Minimum Value of Donated Foods for the Period July 1, 2012 Through June 30, 2013; Notices,” 77 *Federal Register* 142 (24 July 2012), pp. 43232. [http://www.fns.usda.gov/sites/default/files/SY13\\_CommodityMealRate\\_July12.pdf](http://www.fns.usda.gov/sites/default/files/SY13_CommodityMealRate_July12.pdf).

rich items that have low sodium and fat content to schools and SFAs.<sup>76</sup> The distribution of USDA Foods is coordinated at the national level by FNS's Food Distribution Division. At the State level, ordering and distribution of USDA Foods is controlled by State Distributing Agencies (SDAs). In general, SDAs control the ordering of USDA Foods and the procedures and systems SFAs must use to order USDA Foods, and how frequently SFAs order USDA Foods. The SDA must use a request-driven ordering system that permits SFAs to receive, to the extent practical, those USDA Foods that may be used to best advantage in their school foodservice. Such a request-driven ordering system must include SFA input on the types and forms of foods to order. The SDA must permit SFAs to submit orders periodically throughout the school year, as USDA Foods become available, to the extent that entitlements allow. In most States, the SDA is the State CN Agency. However, in eight States, the CN Agency and the SDA are located in different departments.

### 7.2.2 Research Questions

This section addresses the following research questions using data collected from State CN directors:

- Do SAs allow SFAs to order from the full list of USDA Foods?
- How do SAs that do not allow ordering from the full list obtain feedback from SFAs about which USDA Foods to offer?
- How do SFAs submit their requests for specific quantities of USDA Foods?
- How often can SFAs order USDA Foods?
- How does the SA reallocate unused entitlement funds at the end of the school year?

As described above, CN directors in at least 8 States do not have direct control over the ordering and distribution of USDA Foods. In responding to survey questions about USDA Foods, CN directors in these States may have checked with SDA staff for responses to questions about which they were uncertain or may have responded based on their own knowledge or perceptions.

### 7.2.3 Results

In SY 2013–14, 36 percent of SAs (19 out of 53 responding) allowed SFAs to order foods from the full list of USDA Foods (TABLE 7.7), consistent with results from the SY 2012–13 survey, which found that 33 percent of SAs (17 of 51 reporting) allowed SFAs to order from the full list of available USDA foods.

Among SAs that did not allow SFAs to order from the full list of USDA Foods, most (79 percent) obtained feedback from SFAs about which foods to offer by surveying all SFA directors (TABLE 7.7). About half of the SAs used an advisory council comprised of SFA directors (56 percent) and/or obtained feedback from SFA directors at annual State distribution meetings (50 percent).<sup>77</sup>

---

<sup>76</sup> USDA, FNS. 2013. "How USDA Foods Support New Regulatory Requirements under Final Rule, 'Nutrition Standards in the National School Lunch and School Breakfast Programs'." Revised December 2013.  
[http://www.fns.usda.gov/sites/default/files/Meal\\_Pattern\\_USDA\\_Foods\\_Chart\\_Sept2013.pdf](http://www.fns.usda.gov/sites/default/files/Meal_Pattern_USDA_Foods_Chart_Sept2013.pdf).

<sup>77</sup> Included among the "other" methods SAs used to obtain feedback from SFAs regarding which USDA Foods to offer (if the SA does not allow SFAs to order from the full list of USDA Foods) in one or all survey years were using historical trends or analysis of data (i.e., data from prior

TABLE 7.7 *Operational Issues Relating to the USDA Foods Program, as Reported by State CN Directors, SY 2012–13 and SY 2013–14*

Issue	Number of State Agencies	Percentage of State Agencies	Number of State Agencies	Percentage of State Agencies <sup>1</sup>
	SY 2012–13		SY 2013–14	
<b>State allows SFA to order from the full list of USDA Foods<sup>2</sup></b>	n=17	33.3	n=19	35.8
<b>Methods States Used to Obtain Feedback from SFAs Regarding Which USDA Foods to Offer (if SA Does Not Allow SFAs to Order From the Full List of USDA Foods)<sup>3</sup></b>	n=34		n=34	
Survey of All SFA Directors	26	76.5	27	79.4
Utilize Advisory Council Consisting of SFA Directors	22	64.7	19	55.9
Obtain Feedback from SFA Directors at Annual State Distribution Meetings	20	58.8	17	50.0
Other	11	32.4	6	17.6
<b>Methods SFAs Used to Submit Requests for Specific Quantities of USDA Foods<sup>4</sup></b>	n=54		n=53	
State Distributing Agency (SDA) Ordering Food System	21	44.4	30	56.6
Web-Based Supply Chain Management System Food Requisition	24	38.9	19	35.8
Allocation Dumping System	3	5.6	N/A	N/A
USDA Ordering That Allocates Products to SFAs	N/A	N/A	16	30.2
Other	14	25.9	9	17.0
<b>Frequency With Which SFAs Could Order USDA Foods<sup>5</sup></b>	n=47		n=51	
Once a year	13	27.7	19	37.3
Twice a year	4	8.5	7	13.7
More than twice a year	30	63.8	25	49.0
<b>State Reallocation of Unused Entitlement at the End of the School Year<sup>6</sup></b>	n=45		n=52	
Reallocate to SFAs by Request	17	37.8	15	28.8
Reallocate to All SFAs Based on Percentage of Total Meals	13	28.9	9	17.3
No Reallocation or Carry Forward Into the Next School Year	11	24.4	21	40.4
Other	4	8.9	7	13.5

<sup>1</sup> Percentages of State agencies do not add up to 100 percent due to multiple responses allowed.

<sup>2</sup> n=51 in SY 2012–13; n is less than 54 due to item nonresponse; n=53 in SY 2013–14, n is less than 55 due to item nonresponse.

<sup>3</sup> 34 States did not allow SFA directors to order from the full list of USDA foods in SY 2012–13 and SY 2013–14.

<sup>4</sup> SY 2013–14, n is less than 55 due to item nonresponse.

<sup>5</sup> SY 2012–13, n is less than 54 due to item nonresponse; SY 2013–14, n is less than 55 due to item nonresponse.

<sup>6</sup> SY 2012–13, n is less than 54 due to item nonresponse; SY 2013–14, n is less than 55 due to item nonresponse.

**Note:** N/A indicates not applicable. Survey response options differed slightly in the two years, so some information was collected in one year but not the other.

years or data on actual usage), obtaining feedback at CN meetings, obtaining feedback during the annual USDA Foods showcase or other food shows, and obtaining feedback via the SA's partnership with the department of social services.

---

**Source:** State CN Director Survey SY 2012–13, questions C5, C5A, C6, C7, and C8; State CN Director Survey SY 2013–14, questions C4, C4a, C5, C6, and C7.

---

In SY 2013–14, SFAs in more than half of all States (57 percent) could submit requests for specific quantities of USDA Foods using an ordering system operated by the SDA—a noticeably greater percentage than SY 2012–13. SFAs in more than one-third of States (36 percent) had access to a Web-based supply-chain management system, while in 30 percent of States, USDA Foods were allocated to SFAs by the State.<sup>78</sup> SDAs were required to allow SFAs to submit orders periodically throughout the school year, according to the availability of USDA Foods and to the extent that entitlements allow.<sup>79</sup> Forty-nine percent of SAs allowed SFAs to order USDA Foods more than twice per year, however, more than one-third of SAs (37 percent) allowed SFAs to order USDA Foods only once per year. Another 14 percent allowed SFAs to submit two orders per year.

SAs varied in how they reallocated unused entitlement funds at the end of the year. TABLE 7.7 shows that 29 percent of SAs reallocated funds to SFAs by request, 17 percent reallocated based on a percentage of total meals, and 40 percent of SAs did not reallocate or carry forward any funds into the next school year.

Overall, a substantial proportion (36 percent) of SAs allowed SFAs to order from the full list of USDA Foods, and most remaining SAs (79 percent) sought feedback through a number of channels from SFA directors regarding which foods to order. More SAs permitted SFAs to submit requests via an ordering system for USDA Foods in SY 2013–14 than in 2012–13, including 36 percent who used a Web-based system. Unused entitlement funds, when returned, were reallocated to SFAs by request (29 percent) or based on total meals (17 percent), though 40 percent of SAs did not reallocate or carry funds forward.

## 7.3 Farm to School Activities

### 7.3.1 Background

The HHFKA established a Farm to School Program to assist eligible entities, through grants and technical assistance, in the implementation of farm to school programs that increase use of local foods in school meal programs. To fulfill the farm to school mandate, the HHFKA provides \$5 million to USDA annually to support training, technical assistance, planning, equipment purchases, development of school gardens, partnership development, and implementation activities for the Farm to School Program.

---

<sup>78</sup> Included among the “other” methods SFAs used to submit their requests for specific quantities of USDA Foods in one or all survey years were using a State-based Web site or system (such as the Child Nutrition Information and Payment System [CNIPS]), using a computer software program, or submitting an email or other electronic request.

<sup>79</sup> USDA, FNS. 2012. “Food Distribution National Policy Memorandum, Offering School Food Authorities the Required Value and Variety of USDA Foods, and Efficient and Cost-Effective Distribution.” National School Lunch Program (NSLP). FD-125. [http://www.fns.usda.gov/sites/default/files/pmfd125\\_NSLP-ValueVarietyDistribution.pdf](http://www.fns.usda.gov/sites/default/files/pmfd125_NSLP-ValueVarietyDistribution.pdf). Accessed January 13, 2016.

Farm to school activities range from culinary classes to farm visits, and generally center on the procurement of local or regional foods, as well as food, agriculture, or nutrition-based educational activities, including but not limited to:

- Serving local food products in school meals and snacks;
- Serving local food products in classrooms (snacks, taste tests, educational tools);
- Conducting educational activities related to local foods, such as farmers in the classroom and culinary education focused on local foods; field trips to farms, farmers' markets, or food processing facilities; and educational sessions for parents and community members; and
- Creating and tending school gardens (growing edible fruits and vegetables).

### 7.3.2 Research Questions

This section addresses the following research questions using data collected from SFA directors:

- What proportion of SFAs have schools that participated in or plan to participate in farm to school activities? When did implementation of farm to school activities start?
- What proportion of SFAs plan to start participating in farm to school activities in the future? What proportion do not plan to participate?
- How many schools nationwide participated in any farm to school activities in SY 2012–13? How many schools had edible school gardens?
- Among SFAs that had some schools participating in farm to school activities in SY 2012–13:
  - What were the top five food items that were purchased locally?
  - How frequently did SFAs' meals or snacks include different types of locally sourced foods?
  - What percentage of total SFA food costs was spent on locally-sourced foods (with and without milk)?
  - Do SFAs expect the percentage of total food costs spent on locally-sourced foods to increase, decrease, or stay about the same?

### 7.3.3 Results

#### *Farm to School Participation*

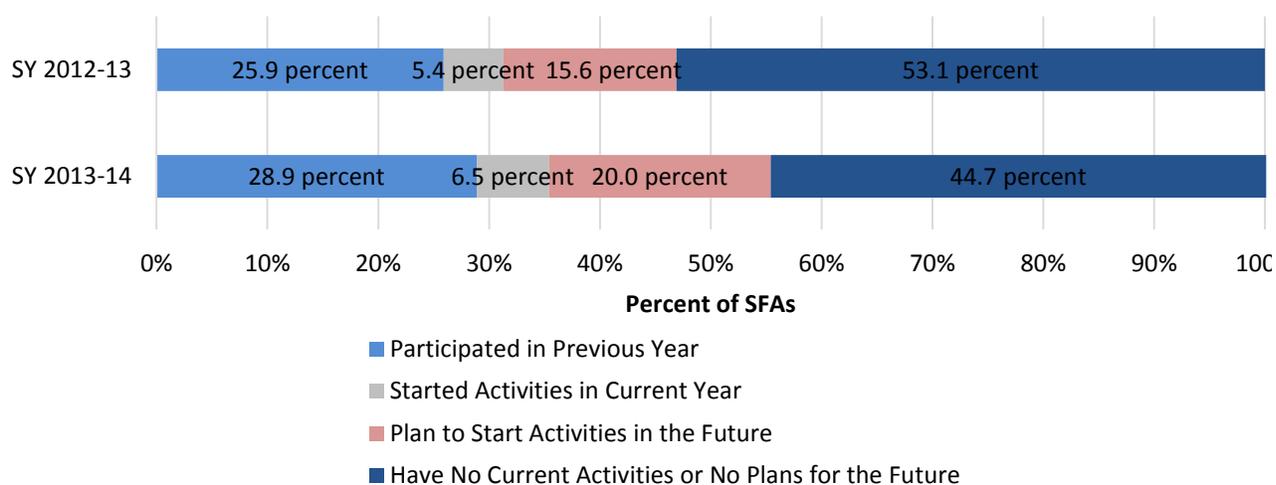
Looking at FIGURE 7.4, in SY 2013–14, 29 percent of SFAs reported that their schools participated in farm to school activities in the previous school year. While this was an increase of three percent from SY 2012–13, the change was not statistically significant. Six percent of SFAs reported that they had schools that began Farm to School activities in the current school year (SY 2013–14); again, the increase from the previous year was not statistically significant.<sup>80</sup>

<sup>80</sup> These results differ from the 2013 USDA Farm to School Census, which found that 43 percent of school districts were engaged in farm to school activities during SY 2012–13. This finding is based on the 75 percent of SFAs that responded to the Census questionnaire (see <http://www.fns.usda.gov/farmtoschool/census#/>).

Twenty percent of SFAs reported schools with plans to start farm to school activities sometime in the future, which is significantly greater than the 16 percent reported in SY 2012–13. Directors in 45 percent of all SFAs indicated that none of the schools in their district were implementing farm to school activities or had plans to start such activities in the future. This was a sizable and statistically significant decrease from 53 percent in SY 2012–13. Overall, FIGURE 7.4 indicates increasing momentum for farm to school activities.<sup>81</sup>

The level of participation in farm to school activities increased significantly with SFA size (TABLE 7.8). Participation also varied by urbanicity and poverty level. SFAs located in rural and high-poverty areas participated at lower rates than SFAs located in other areas, indicating that some barriers may exist in the execution of farm to school programs in smaller, poorer, and less urban SFAs.

FIGURE 7.4 *Percentage of SFAs With Schools That Participated in Farm to School Activities, SY 2012–13 and SY 2013–14*



**Note:** The percentage of SFAs that planned to start activities in the future differed significantly between SY 2012–13 and SY 2013–14. The percentage of SFAs that had no current activities or plans for the future differed significantly between SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2012–13, question 10.1 (asked retrospectively); SFA Director Survey SY 2013–14, question 8.1 (asked retrospectively).

<sup>81</sup> As discussed in the final report for Year 2 of the study, SFA directors seem to underreport farm to school activities, perhaps by not considering the purchase of locally grown foods as a farm to school activity (Standing et al., 2015). Appendix TABLE D.21 presents data on the estimated number of schools nationwide that had any farm to school activities and the number that had edible school gardens.

TABLE 7.8 *Percentage of SFAs With Schools That Participated in Farm to School Activities by SFA Characteristics, SY 2013–14*

SFA Characteristics	Participated in SY 2012–13	Percentage of SFAs with schools that:		Had No Current Activities or Plans for the Future
		Did Not Participate in SY 2012–13 But: Started Activities in SY 2013–14	Planned to Start Activities in the Future	
<b>All SFAs</b>	28.9	6.5	20.0	44.7
<b>SFA Size<sup>1</sup></b>				
Small (1–999)	17.0	5.7	20.2	57.1
Medium (1,000–4,999)	37.8	6.6	21.6	34.1
Large (5,000–24,999)	47.6	9.1	15.0	28.3
Very Large (25,000+)	57.9	6.9	15.0	20.2
<b>Urbanicity<sup>1</sup></b>				
City	44.2	8.0	12.8	35.0
Suburban	36.0	5.5	17.8	40.6
Town	37.0	7.3	21.7	34.1
Rural	22.8	6.5	21.1	49.6
<b>Poverty Level<sup>1</sup></b>				
Low (0–29 percent F/RP)	38.7	6.6	18.1	36.6
Medium (30–59 percent F/RP)	28.8	5.8	18.4	47.0
High (60 percent or more F/RP)	22.6	7.4	23.6	46.4

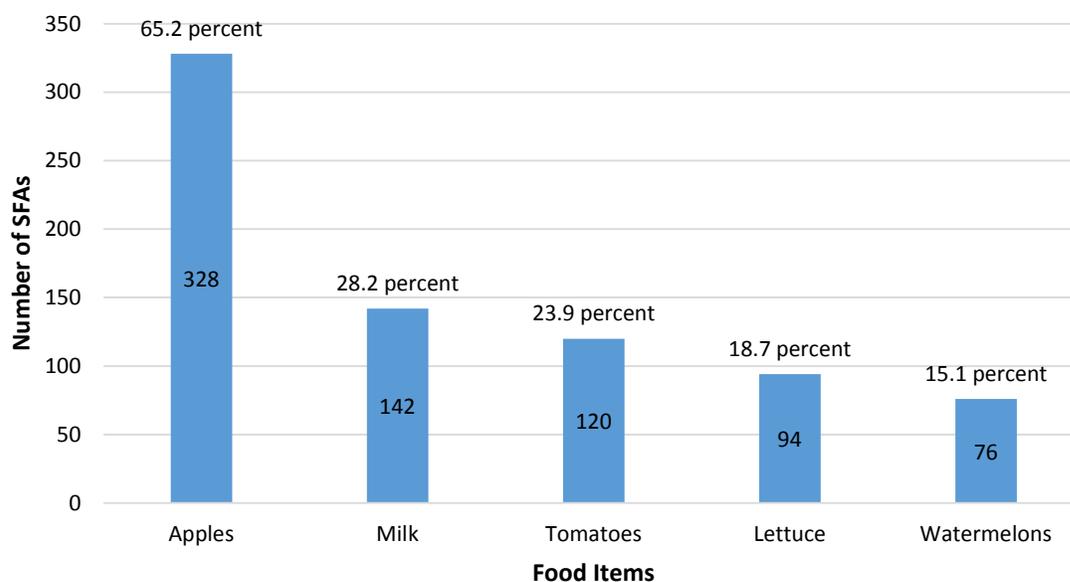
<sup>1</sup> Percentage of SFAs with schools that participated in farm to school activities differed significantly by SFA size, urbanicity, and poverty level in SY 2013–14.

**Source:** SFA Director Survey SY 2013–14, question 8.1 (asked retrospectively).

### *Locally Sourced Foods*

SFA directors that reported schools currently participating in farm to school activities in SY 2012–13 identified the top five food items purchased locally during SY 2012–13, based on their dollar value. The most frequently cited foods were apples (65 percent), milk (28 percent), tomatoes (24 percent), lettuce (19 percent), and watermelons (15 percent; FIGURE 7.5). TABLE 7.9 shows the relative frequency with which specific types of locally sourced foods were included in school meals or snacks in SY 2012–13. Of the locally sourced food items asked about in the survey, those reported as the most frequently served on a daily basis or a few times per week included milk (60 percent), fruit (43 percent), vegetables (31 percent), and bakery products (24 percent; see TABLE 7.9). More than three-quarters of SFA directors said they never served locally sourced seafood (88 percent), and more than two-thirds never served locally sourced grains and flour (69 percent), eggs (68 percent), or plant-based proteins (67 percent) (TABLE 7.9).

FIGURE 7.5 *The Top Five Food Items SFAs Purchased Locally, Based on Dollar Value, SY 2012–13*



**Note:** 503 SFAs listed the top five food items that were purchased locally during SY 2012–13, based on dollar value.

**Source:** SFA Director Survey SY 2013–14, question 8.4.

TABLE 7.9 *Percentage of SFAs Reporting Frequency of Meals and/or Snacks That Include at Least One Locally Sourced Food Item, SY 2013–14*

Food Item	Percentage of SFAs Indicating							Total SFAs	
	Daily	A Few Times Per Week	Weekly	A Few Times Per Month	Monthly	Occasionally	Never	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>
Fluid Milk	58.4	1.2	4.2	0.6	0.7	0.7	34.2	3,470	519
Fruit	25.5	17.8	11.9	10.3	4.9	23.0	6.7	3,681	543
Vegetables	17.8	12.8	13.6	14.1	6.1	25.4	10.2	3,666	540
Bakery Products	16.9	7.4	3.4	3.9	1.5	8.9	58.0	3,305	498
Other Dairy	12.0	6.5	8.3	4.0	1.0	14.2	54.1	3,199	483
Grains and Flour	9.9	3.2	2.6	2.3	2.7	10.5	68.9	3,305	496
Meat/Poultry	9.1	2.4	3.6	5.8	2.2	17.1	60.0	3,338	501
Eggs	4.4	2.5	6.9	3.1	2.1	13.4	67.6	3,322	495
Herbs	3.1	4.2	3.9	5.1	1.4	20.7	61.7	3,315	495
Plant-Based Proteins	2.9	3.2	6.8	4.0	2.2	13.7	67.1	3,263	491
Seafood	0.1	0.4	0.2	2.5	0.8	7.6	88.3	3,256	493

<sup>1</sup> Of 558 SFAs that had schools participating in farm to school activities during SY 2012–13.

**Source:** SFA Director Survey SY 2013–14, question 8.5.

To further investigate the role of locally sourced foods in school meal programs, SFA directors were asked to provide their best estimate of the proportion of total food costs spent on locally sourced foods. SFA directors assessed this estimate with and without milk, and indicated whether they expected this proportion to increase, decrease, or stay the same in the upcoming school year. Overall, SFAs that reported farm to school activities in SY 2012–13 estimated that 17 percent of their total food expenditures in that school year, on average, were spent on locally sourced foods (TABLE 7.10). When milk was excluded from the calculation, the percentage spent on locally sourced foods decreased to 11 percent. Sixty percent of SFA directors reported that they expected expenditures on locally sourced foods to increase in the upcoming school year, while 38 percent of SFA directors expected expenditures to stay about the same, and only 2 percent expected expenditures to decrease.<sup>82</sup> The overall conclusion from TABLE 7.10 is to expect increasing use of local foods.

---

<sup>82</sup> The question asked SFA directors to report expectations for SY 2014–15 based on expenditures during SY 2013–14. Given the sample sizes reported on the last row of TABLE 7.10, statistically significant differences due to SFA characteristics were not expected.

TABLE 7.10 *Among SFAs With Schools Participating in Farm to School Activities in SY 2012–13, the Proportion of Total Food Costs Spent on Locally Sourced Foods and Anticipated Changes, SY 2013–14*

SFA Characteristics	Average Percent Spent on Locally Sourced Foods		Compared To SY 2013–14, Anticipated Change in SY 2014–15 (percentage of SFAs)		
	Including milk	Excluding milk	Increase	Decrease	Stay the same
All SFAs	16.9	10.7	59.7	2.2	38.1
<b>SFA Size</b>					
Small (1–999)	15.5	11.9	56.8	3.4	39.8
Medium (1,000–4,999)	17.2	10.7	58.0	2.0	40.1
Large (5,000–24,999)	17.8	9.2	66.7	1.4	31.9
Very Large (25,000+)	19.4	10.0	68.4	0.0	31.6
<b>Urbanicity</b>					
City	19.0	9.3	61.1	0.0	38.9
Suburban	16.9	8.8	60.2	1.1	38.7
Town	20.4	11.4	51.8	4.4	43.9
Rural	14.4	12.0	62.8	2.4	34.8
<b>Poverty Level</b>					
Low (0–29 percent F/RP)	17.6	8.6	55.7	1.3	43.1
Medium (30–59 percent F/RP)	15.4	9.4	59.1	3.3	37.6
High (60 percent or more F/RP)	19.5	15.6	64.7	1.1	34.2
Wgtd <i>n</i>	3,237	3,307	3,848		
Unwgted <i>n</i> <sup>1</sup>	480	485	555		

<sup>1</sup> *n* is less than 558 due to item nonresponse.

**Note:** Neither the percentage spent on locally sourced foods (including and excluding milk) nor the anticipated change in SY 2014–15 regarding the percentage of food costs spent on locally sourced foods differed significantly by SFA size, urbanicity, or poverty level.

**Source:** SFA Director Survey SY 2013–14, questions 8.8 through 8.9.

## 7.4 Food Safety

### 7.4.1 Background

In any foodservice operation, the potential for food safety incidents, such as an outbreak of foodborne illness, must be addressed. The Child Nutrition and WIC Reauthorization Act (PL 108-265) of 2004 continues to require all SFAs to implement a food safety program based on the Hazard Analysis and Critical Control Point (HACCP) principles to ensure the meals served in schools are safe. The HHFKA reinforced this focus on food safety; schools must receive two food safety inspections each year and

demonstrate that their food safety programs apply to any location where school meal program food is stored or prepared.<sup>83</sup>

The FNS Office of Food Safety provides food safety education and training resources for school foodservice professionals and CN program operators. The SY 2013–14 SFA Director Survey included questions that addressed food safety topics that affect foodservice staff.

#### 7.4.2 Research Questions

This section addresses the following research questions using data obtained from SFA directors:

- In which locations are foods served to students?
- Do staff/individuals other than nutrition staff serve food to students?
- Are outside groups, such as parent, teacher, student, or community organizations, allowed to use SFA kitchens without oversight from school nutrition staff?
- Do SFAs have policies that address the health and hygiene of school nutrition employees? If so, when are employees with symptoms of vomiting or diarrhea allowed to return to work?
- Are school nutrition staff offered paid sick leave?

#### 7.4.3 Results

##### *Locations and Staff Involved in Serving Food to Students*

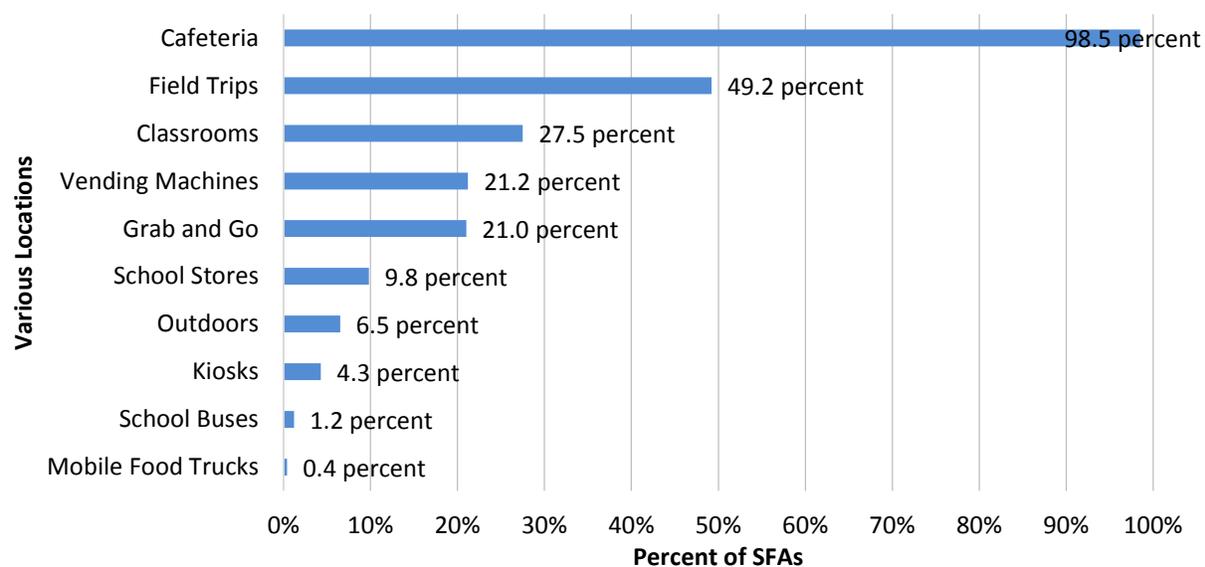
Almost all SFAs (99 percent) serve food to students in cafeterias (*FIGURE 7.6*). About half (49 percent) provide food for field trips, and more than one-quarter (28 percent) serve food in classrooms; the next most common locations were grab-and-go pick up locations and vending machines (21 percent each). Much smaller proportions of SFAs serve food in school stores (10 percent), outdoor locations other than foodservice areas (7 percent), kiosks (4 percent), school buses (1 percent), or mobile food trucks (less than 1 percent).

All foodservice locations other than school buses significantly differed with SFA size (*TABLE 7.11*). In addition, foodservice locations other than cafeterias varied by urbanicity and poverty level. SFAs located in cities and in high-poverty areas more commonly served food in classrooms and on field trips, respectively, while more suburban and low-poverty SFAs provided foodservice via vending machines. School stores provided foodservice locations in a higher percentage of SFAs in urban/suburban locations and low and medium poverty levels.

---

<sup>83</sup> USDA, FNS. 2014. "Food-Safe Schools Action Guide: Creating a Culture of Food Safety." Published in November. <http://www.fns.usda.gov/sites/default/files/Food-Safe-Schools-Action-Guide.pdf>.

FIGURE 7.6 *Percentage of SFAs Using Various Locations to Serve Food to Students, SY 2013–14*



Source: SFA Director Survey SY 2013–14, question 9.1.

TABLE 7.11 Locations Where SFAs Serve Food to Students, by SFA Characteristics, SY 2013–14

SFA Characteristics	Percentage of SFAs Serving Food in or on										
	Cafeteria <sup>1</sup>	Field Trips	Classrooms	Vending Machines	Grab and Go Line	School Stores	Outdoors <sup>1</sup>	Kiosks	School Buses	Mobile Food Trucks	Other <sup>2</sup>
All SFAs	98.5	49.2	27.5	21.2	21.0	9.8	6.5	4.3	1.2	0.4	1.4
<b>SFA Size<sup>3</sup></b>											
Small (1–999)	97.5	42.7	21.3	10.6	11.7	2.9	4.9	0.2	1.2	0.0	1.4
Medium (1,000–4,999)	99.7	53.3	29.8	29.5	27.8	13.9	6.1	4.8	1.1	0.5	1.3
Large (5,000–24,999)	99.1	61.8	43.8	41.1	36.9	26.7	11.8	14.4	1.6	1.7	1.3
Very Large (25,000+)	100.0	79.7	60.9	42.4	54.5	28.2	25.3	44.3	0.1	3.0	2.2
<b>Urbanicity<sup>4</sup></b>											
City	96.3	69.3	55.2	20.5	32.6	17.5	10.8	11.3	1.9	1.7	1.6
Suburban	98.7	43.0	25.5	33.9	27.0	15.5	7.3	7.5	0.6	1.3	2.3
Town	98.8	54.7	28.1	20.6	23.2	10.8	4.5	4.2	1.1	0.2	1.6
Rural	99.4	47.1	23.2	19.1	17.1	6.9	5.5	2.1	1.0	0.0	0.3
<b>Poverty Level<sup>5</sup></b>											
Low (0–29 percent F/RP)	99.9	30.8	15.9	35.9	24.7	12.8	4.8	5.2	1.0	0.5	1.0
Medium (30–59 percent F/RP)	99.3	51.4	28.0	22.9	21.9	10.3	5.4	4.1	1.1	0.3	0.8
High (60 percent or more F/RP)	96.5	57.6	34.0	9.9	17.3	7.3	8.8	3.9	1.5	0.5	2.4
Wgtd <i>n</i>						14,883					
Unwgtd <i>n</i>						<sup>a</sup> 1,572					

<sup>1</sup> Includes other indoor/outdoor foodservice areas.

<sup>2</sup> Other than indoor/outdoor foodservice areas.

<sup>3</sup> The percentage of SFAs where food was served in cafeteria, classroom, outdoor, grab and go, kiosk, vending machine, school store, field trip, and mobile food truck locations differed significantly by SFA size.

<sup>4</sup> The percentage of SFAs where food was served in classroom, grab and go, kiosk, vending machine, school store, field trip, and other locations differed significantly by urbanicity.

<sup>5</sup> The percentage of SFAs where food was served in cafeteria, classroom, vending machine, school store, and field trip locations differed significantly by poverty level.

<sup>a</sup> *n* is less than 1,598 due to item nonresponse.

**Note:** .SFAs responded regarding all locations, so percentages may not add up to 100 percent horizontally.

**Source:** SFA Director Survey SY 2013–14, question 9.1.

TABLE 7.12 shows the various staff who served food to students in SY 2013–14. In 62 percent of SFAs, no one other than school nutrition staff served food to students. In more than one-quarter (28 percent) of SFAs, teachers served food to students; classroom aides served food to students in approximately 21 percent of SFAs. It is likely that the involvement of teachers and classroom aides is at least partially attributable to serving breakfast in the classroom. Individuals listed as “other” (i.e., parent volunteers, bus drivers, or other school staff) served food to children in 8 percent of SFAs. Teachers serving food to students differed significantly by poverty level; 34 percent of teachers in high-poverty SFAs served food to students, in contrast to 17 percent in low-poverty SFAs. The involvement of parent volunteers as foodservice staff increased with SFA size, while the likelihood of schools with foodservice staff comprised of classroom aides increased with both SFA size and relative poverty level.

TABLE 7.12 *Staff That Served Food to Students, SY 2013–14*

SFA Characteristics	Percentage of SFAs					
	School Nutrition Staff Only	Teachers	Classroom Aides	Parent Volunteers	Bus Drivers	Other Staff
All SFAs	61.6	27.5	20.7	9.0	1.3	7.8
<b>SFA Size<sup>1</sup></b>						
Small (1–999)	61.0	26.3	21.6	7.4	1.6	9.0
Medium (1,000–4,999)	61.6	27.5	20.7	9.0	1.3	7.8
Large (5,000–24,999)	56.3	33.6	23.2	12.9	1.2	8.6
Very Large (25,000+)	40.3	45.1	35.4	21.3	0.5	13.6
<b>Urbanicity<sup>2</sup></b>						
City	48.4	39.2	25.7	8.1	0.5	12.9
Suburban	66.4	24.7	17.8	10.9	0.1	6.3
Town	64.8	27.4	22.6	7.6	1.4	5.1
Rural	61.4	26.9	20.9	8.8	0.9	7.6
<b>Poverty Level<sup>3</sup></b>						
Low (0–29 percent F/RP)	71.4	17.4	16.0	11.6	0.6	6.7
Medium (30–59 percent F/RP)	61.8	27.0	20.6	8.7	0.7	7.3
High (60 percent or more F/RP)	55.6	34.1	23.6	7.8	2.4	9.1
Wgtd <i>n</i>			14,538			
Unwgtd <i>n</i>			<sup>a</sup> 1,541			

<sup>1</sup> The percentage of SFAs where food was served by teachers, classroom aides, parent volunteers, and “school nutrition staff only” other than food staff differed significantly by SFA size.

<sup>2</sup> The percentage of SFAs where food was served by bus drivers differed significantly by urbanicity.

<sup>3</sup> The percentage of SFAs where food was served by teachers and “none of these” other than food staff differed significantly by poverty level.

<sup>a</sup> *n* is less than 1,598 SFAs due to item nonresponse.

**Note:** More than one answer may be specified, so percentages may add up to more than 100 percent.

**Source:** SFA Director Survey SY 2013–14, question 9.2.

### *Use of SFA Kitchens by Outside Groups*

The majority of SFAs (83 percent) did not allow outside groups, such as parent/teacher organizations, booster clubs, or student organizations, to use SFA kitchens without oversight by school nutrition staff

(TABLE 7.13).<sup>84</sup> Small SFAs, SFAs located in rural areas, and SFAs located in areas with low and medium levels of poverty were more likely to allow outside groups to use school kitchens without oversight.

TABLE 7.13 *Percentage of SFAs That Permit Outside Groups to Use SFA Kitchens Without Oversight from School Nutrition Staff*

SFA Characteristics	Outside Groups are Permitted to Use Kitchens Without Oversight (percent)	
	Yes	No
All SFAs	17.4	82.6
<b>SFA Size<sup>1</sup></b>		
Small (1–999)	23.7	76.3
Medium (1,000–4,999)	11.9	88.1
Large (5,000–24,999)	8.8	91.2
Very Large (25,000+)	4.7	95.3
<b>Urbanicity<sup>2</sup></b>		
City	7.1	92.9
Suburban	9.4	90.6
Town	12.8	87.2
Rural	25.5	74.5
<b>Poverty Level<sup>3</sup></b>		
Low (0–29 percent F/RP)	17.9	82.1
Medium (30–59 percent F/RP)	20.7	79.3
High (60 percent or more F/RP)	12.4	87.6
Weighted <i>n</i>	14,301	
Unweighted <i>n</i>	<sup>a</sup> 1,539	

<sup>1</sup> The percentage of SFAs where outside groups were permitted to use kitchens without oversight differed significantly by SFA size.

<sup>2</sup> The percentage of SFAs where outside groups were permitted to use kitchens without oversight differed significantly by urbanicity.

<sup>3</sup> The percentage of SFAs where outside groups were permitted to use kitchens without oversight differed significantly by poverty level.

<sup>a</sup> *n* is less than 1,598 SFAs due to item nonresponse.

**Source:** SFA Director Survey SY 2013–14, questions 9.3.

### *Policies for School Nutrition Employees*

Ninety-four percent (data not shown) of SFAs reported having a policy for school nutrition employees that addresses health and hygiene. SFAs serve millions of school meals nationally each day; students who consume school meals represent a very large pool of potential victims of foodborne illnesses. To effectively reduce the risk that students are exposed foodborne pathogens, school foodservice operations must take great care in the development of policies regarding the health and hygiene of

<sup>84</sup> The analysis is based on SFAs that had kitchens. Three percent of SFAs did not have any kitchens, most likely because meals were delivered by outside vendors.

foodservice staff, and protocols should ensure that contagious employees (as those with symptoms of diarrhea and vomiting are likely to be) have access to adequate sick leave and receive medical attention before returning to work.

*TABLE 7.14* reports the policies used by SFAs regarding when an employee with diarrhea or vomiting may return. Seventy-six percent of SFAs indicated that they allowed employees to return to work when symptom-free for at least 24 hours; 27 percent of SFAs allowed employees to return to work with approval from a doctor (*TABLE 7.4*). However, 14 percent of SFAs reported that their current policies failed to address the return of employees suffering from vomiting or diarrhea.

SFAs located in suburban areas (31 percent) were significantly more likely to allow employees to return with approval from a doctor. SFAs located in medium-poverty areas were significantly less likely to allow employees to return with approval from a doctor, and more likely to allow employees to return after being symptom-free for 24 hours, than SFAs located in high- and low-poverty areas.

TABLE 7.14 *Policy Regarding When Employees With Diarrhea or Vomiting Are Allowed To Return to Work, by SFA Characteristics, SY 2013–14*

SFA Characteristics	When They Are Symptom-Free for At Least 24 Hours (percent)	With Approval From Doctor (percent)	Other Policy (percent)	Not Addressed in Current Policies (percent)
All SFAs	76.1	26.6	2.2	13.5
<b>SFA Size<sup>1</sup></b>				
Small (1–999)	74.3	24.2	1.9	16.3
Medium (1,000–4,999)	78.1	28.4	2.5	10.4
Large (5,000–24,999)	78.4	30.2	2.7	10.3
Very Large (25,000+)	71.6	33.4	2.1	15.2
<b>Urbanicity<sup>2</sup></b>				
City	73.0	27.1	1.7	13.5
Suburban	73.8	30.9	3.4	9.8
Town	77.6	26.7	2.0	12.8
Rural	77.9	22.6	1.9	15.6
<b>Poverty Level<sup>3</sup></b>				
Low (0–29 percent F/RP)	76.3	27.8	2.9	10.3
Medium (30–59 percent F/RP)	78.5	21.4	1.9	14.8
High (60 percent or more F/RP)	72.6	32.6	2.3	13.7
Weighted <i>n</i>		13,674		
Unweighted <i>n</i>		<sup>a</sup> 1,476		

<sup>1</sup> The percentage of SFAs that lacked policy addressing when employees might return to work differed significantly by SFA size.

<sup>2</sup> The percentage of SFAs where employees were allowed to return to work with approval for from a doctor differed significantly by urbanicity.

<sup>3</sup> The percentage of SFAs where employees were allowed to return to work with approval for from a doctor differed significantly by poverty level.

<sup>a</sup> *n* is less than the 1,493 SFAs that had a policy for school nutrition employees that addressed health and hygiene due to item nonresponse.

**Notes:** More than one answer could be specified, so percentages may add up to more than 100 percent.

**Source:** SFA Director Survey, SY 2013–14, question 9.5.

The vast majority of SFAs (94 percent) provided paid sick leave for full-time employees, and 65 percent provided this benefit to part-time employees (TABLE 7.15). For full-time employees the availability of paid sick leave increased with SFA size. However, paid sick leave for part-time employees increased from small to large SFAs, but then experienced a decrease with very large SFAs. In addition, SFAs located in cities were significantly less likely than SFAs located in other areas to provide paid sick leave for either full- or part-time employees. SFAs located in low-poverty areas were less likely than SFAs located in higher poverty areas to provide paid sick leave for full-time employees, but were significantly more likely to provide paid sick leave for part-time employees.

TABLE 7.15 *Availability of Paid Sick Leave for Food Service Employees, SY 2013–14*

SFA Characteristics	Percentage of SFAs	
	Paid Sick Leave Available for Full-Time Employees	Paid Sick Leave Available for Part-Time Employees
All SFAs	94.0	64.5
<b>SFA Size<sup>1</sup></b>		
Small (1–999)	92.5	59.8
Medium (1,000–4,999)	94.8	67.4
Large (5,000–24,999)	97.7	75.5
Very Large (25,000+)	99.5	63.9
<b>Urbanicity<sup>2</sup></b>		
City	88.5	59.6
Suburban	92.3	74.1
Town	97.1	64.4
Rural	96.2	65.7
<b>Poverty Level<sup>3</sup></b>		
Low (0–29 percent F/RP)	90.0	73.1
Medium (30–59 percent F/RP)	95.5	69.7
High (60 percent or more F/RP)	94.4	51.7
Wgtd <i>n</i>	14,357	13,679
Unwgted <i>n</i>	<sup>a</sup> 1,535	<sup>a</sup> 1,488

<sup>1</sup> The percentage of SFAs that paid sick leave for both full-time and part-time differed significantly by SFA size for both full-time and part-time employees.

<sup>2</sup> The percentage of SFAs that paid sick leave for both full-time and part-time school nutrition employees differed significantly by urbanicity.

<sup>3</sup> The percentage of SFAs that paid sick leave for part-time school nutrition employees differed significantly by poverty level.

<sup>a</sup> *n* is less than 1,598 SFAs due to item nonresponse.

**Source:** SFA Director Survey SY 2013–14, question 9.6.

## 8 School Food Authority Financials

### 8.1 Meal Prices

#### 8.1.1 Background

To remain economically viable and to ensure their foodservice operations reflect the needs of the communities they serve, SFAs must take numerous cost factors—such as labor and food costs, along with Federal regulations and reimbursement rates—into careful consideration as they adjust their meal prices each school year. In particular, one component of the HHFKA, the Paid Lunch Equity provision (PLE), has resulted in pricing policy changes for a large number of SFAs participating in the NSLP.

Since SY 2011–12, schools have been required to increase their paid lunch prices until the average lunch price reached the free reimbursement rate minus the paid reimbursement rate, known as the weighted average price (WAP).<sup>85</sup> SFAs are required to calculate their WAP using the school meal prices reported for past years along with the average lunch price for the current year. However, SFAs may opt to not increase the price of their lunch and use cash from non-Federal sources in direct support for paid lunches in lieu of price increases.

SN-OPS reports from prior school years indicate that a significant percentage of SFAs have enacted increases in their paid meal prices in order to meet the pricing goals of the updated provision. While the provision addresses only lunch equities, the cost of full-price breakfasts, for all school types, has also consistently increased during the years studied in SN-OPS. Therefore, it is essential to look at the price distributions for both programs to analyze and isolate the role of the PLE.

In addition to explicit meal price regulations such as the PLE, SFAs also face challenges stemming from local and national economic conditions. Factors such as inflation and periods of recession can influence household incomes, potentially changing the proportion of students eligible to receive F/RP and able to afford paid meals. Economic downturns may also have exogenous impacts on labor and food costs. Students from low-income households (those eligible for F/RP meals) may face higher food insecurity stemming from increases in food costs and decreases in household income during recessions, when higher unemployment rates are prevalent. Recent USDA research found that an increase of 1 percentage point in both the unemployment rate and the relative price of food was correlated with 0.5 and 0.6 percentage point increases in food insecurity, respectively.<sup>86</sup>

This section examines emerging trends in SFA meal prices between SY 2009–10 and SY 2013–14 in light of factors such as reimbursement rates, SFA characteristics, legislative policy changes, and the national business cycle.

---

<sup>85</sup> The required Weighted Average Price (WAP) for SY 2012–13 was \$2.65.

<sup>86</sup> Nord, Mark, Alisha Coleman-Jensen, and Christian Gregory. 2014. "Prevalence of U.S. Food Insecurity Is Related to Changes in Unemployment, Inflation, and the Price of Food." Published in June. [http://www.ers.usda.gov/media/1489980/err167\\_summary.pdf](http://www.ers.usda.gov/media/1489980/err167_summary.pdf).

### *Paid Lunch Equity Provision*

The PLE was introduced to address an indirect misallocation of revenues found in a substantial percentage of SFAs. It was determined that paid lunches were being “underpriced,” and the practice resulted in an unintended subsidization of paid school lunches using revenues derived from Federal reimbursements.

Under the provision, SFAs are required to increase their paid lunch price until the average paid lunch price reaches the free reimbursement rate minus the paid reimbursement rate.<sup>87,88</sup> An SFA’s current WAP is based on the prior year’s meal prices. SFAs must increase prices until the required WAP is achieved.

SFAs may opt out of increasing their school prices in order to meet the WAP by invoking one of the flexibilities<sup>89</sup> made available by USDA, and can instead cover any shortfalls in revenue with the following sources of non-Federal funds: (1) per-meal non-Federal reimbursement for any paid meal (breakfast, lunch, etc.); (2) any funds provided by organizations for any paid meal; and (3) any proportion attributable to paid meals from direct payments made from school district funds to support lunch service. In SY 2013–14, USDA expanded the definition of “non-Federal source” to include all paid meals to help SFAs meet the PLE requirement and to acknowledge the continuing support by SFAs and locals to improve access to and participation in the breakfast program.<sup>90</sup> Additionally, SFAs in a strong financial position may claim exemption from price increases, even if they remain under required WAP levels; this is subject to the condition that the school foodservice account must be nonprofit and SFAs must not exceed a three-month operating balance in their account.<sup>91</sup>

SFAs not currently meeting the WAP must increase their meal prices by a 2 percent annual rate plus the percentage change in the Food Away From Home series<sup>92</sup> of the Consumer Price Index for All Urban

---

<sup>87</sup> SFAs have the discretion to distribute average price increases among their schools to reach the required WAP. For additional information, see USDA, FNS. N.D. “Paid Lunch Equity and Nonprogram Food Revenue.” Accessed January 29, 2016. <http://www.fns.usda.gov/sites/default/files/PLEwebinar.pdf>.

<sup>88</sup> Indiana Department of Education. N.D. “Paid Lunch Equity Pricing Fact Sheet.” Accessed January 29, 2016. <http://www.doe.in.gov/sites/default/files/nslp-pricing-guidancepaid-lunch-equity-pricing-fact-sheet-sy-2013.pdf>.

<sup>89</sup> USDA memo SP 34-2013 (USDA, FNS. 2013. “SP 34-2013: Paid Lunch Equity: Additional Guidance for School Year (SY) 2013-2014.” Published April 14. <http://www.fns.usda.gov/sites/default/files/SP34-2013os.pdf>) expanded the definition of non-Federal funds under Program regulations found in 7 CFR § 210.14(e)(5)(iii); see <http://www.gpo.gov/fdsys/pkg/CFR-2013-title7-vol4/pdf/CFR-2013-title7-vol4-sec210-14.pdf>.

<sup>90</sup> USDA memo SP 03-2015 (USDA, FNS 2015). “SP 03-2015: Paid Lunch Equity: School Year 2015-16 Calculations and Tool.” Published October 8. <http://www.fns.usda.gov/sites/default/files/cn/SP03-2015os.pdf>.

<sup>91</sup> USDA, FNS. 2013. “SP34-2013: Paid Lunch Equity: Additional Guidance for School Year (SY) 2013-2014.” Published April 14. <http://www.fns.usda.gov/sites/default/files/SP34-2013os.pdf>.

<sup>92</sup> The Food Away From Home series is a component of the Consumer Price Index for All Urban Consumers that reflects the price of all meals (breakfast and brunch, lunch, dinner, and snacks and nonalcoholic beverages) including tips at fast food, take-out, and delivery restaurants, concession stands, buffets and cafeterias, full-service restaurants, and at vending machines and mobile vendors. Also included are board (including at school), meals as pay, special catered affairs, such as weddings, bar mitzvahs, and confirmations, school lunches, and meals away

Consumers (CPI).<sup>93</sup> SFAs are only required to increase their average paid price by a maximum of 10 cents in any given school year, but may elect to make higher increases. The adjusted paid lunch price can be rounded down to the nearest five cents. If an SFA chooses to increase paid lunch prices more than required by the PLE, the amount attributable to the SFA's discretionary additional increase may be subtracted from the total paid lunch price increases requirement of the next school year.<sup>94</sup> Reductions of paid lunch prices may occur, but the SFA must still achieve WAP levels by using approved non-Federal funds.<sup>95</sup>

### *Reimbursement Rates*

Conventionally, eligibility for F/RP meals is determined by a student's household income, with those at or below 130 percent of the Federal poverty level eligible for free meals, and those between 130 and 185 percent eligible for reduced-priced meals (not to exceed 40 cents for the NSLP and 30 cents for the SBP).<sup>96</sup> Additionally, students whose families participate in assistance programs (e.g., SNAP, FDPIR, or TANF); who participate in Head Start or Even Start; who are foster children, homeless, migrant, runaway migrant, or runaways are eligible to receive F/RP meals. Students exceeding those parameters pay full price for meals, although all meals are subsidized to some extent. SFAs then receive cash reimbursement for the number of meals served within each categorical and income eligibility category that meet nutritional requirements set by USDA. Under this reimbursement structure, SFAs are allowed to set their own prices for paid meals, but must operate their meal services as nonprofit programs. SFAs may use the PLE Tool, which was created to help SFAs calculate their paid lunch price increase requirement and non-Federal source contributions to meet Section 205 requirements of HHFKA.

TABLE 8.1 shows meal reimbursement rates by income and categorical (e.g., participation in assistance programs, Head Start, homeless status) eligibility in the NSLP and the SBP for SY 2009–10 to SY 2013–14. F/RP reimbursements for meals served in both the NSLP and the SBP increased steadily over the last five school years, while the reimbursement for paid meals remained relatively unchanged over the same period. With the implementation of the PLE, SFAs must pay close attention to changes in reimbursement rates in order to meet minimum average price levels, discussed in greater detail below.

---

from home on trips. See United States Department of Labor (DOL), Bureau of Labor Statistics (BLS). 2015. "Consumer Expenditure Survey: Glossary." Last modified February 13. <http://www.bls.gov/cex/csxgloss.htm>.

<sup>93</sup> The Consumer Price Index (CPI) is a measure of the average change over time in the price paid by urban consumers for a market basket of consumer goods and services. See USDOL, BLS. 2015. "Consumer Price Index: Frequently Asked Questions." Last modified July 24. <http://www.bls.gov/cpi/cpifaq.htm>.

<sup>94</sup> USDA, FNS. 2013. "SP 25-2013: Paid Lunch Equity: School Year 2013–14 Calculations and Tool." Published February 21. <http://www.fns.usda.gov/sites/default/files/SP25-2013os.pdf>.

<sup>95</sup> See Section 205, Equity in School Lunch Pricing, of the Healthy, Hunger-Free Kids Act of 2010. The full text of the HHFKA is available at <https://www.govtrack.us/congress/bills/111/s3307/text>.

<sup>96</sup> Higher reimbursement rates are provided for Alaska and Hawaii and for schools with a high percentage of low-income students. For the period of July 1, 2013, through June 30, 2014, 130 percent of the poverty level was \$30,615 for a family of four; 185 percent was \$43,568.

TABLE 8.1 *Reimbursement Rates for the NSLP and the SBP, SY 2009–10 to SY 2013–14*

Income Eligibility Category	SY 2009–10 Reimbursement Rates		SY 2010–11 Reimbursement Rates		SY 2011–12 Reimbursement Rates		SY 2012–13 Reimbursement Rates		SY 2013–14 Reimbursement Rates	
	SBP	NSLP								
Free	\$1.46	\$2.68	\$1.48	\$2.72	\$1.51	\$2.77	\$1.55	\$2.86	\$1.58	\$2.93
Reduced-Price	1.16	2.28	1.18	2.32	1.21	2.37	1.25	2.46	1.28	2.53
Paid	0.26	0.25	0.26	0.26	0.27	0.26	0.27	0.27	0.28	0.28

Source: <http://www.fns.usda.gov/school-meals/rates-reimbursement>

### *Community Eligibility Provision*<sup>97</sup>

Some SFAs were able to participate in CEP during the study period to participate in this provision, as the provision was phased in over a three-year period beginning in July 2011. SFAs operating under CEP must meet a threshold where at least 40 percent of students are identified for free meals in the year prior to implementing the provision, and they must agree to provide free lunch and breakfast to all students. SFAs also agree to no longer collect individual household applications for F/RP meals. Instead, schools functioning under CEP identify students that qualify for F/RP meals on the basis of their participation in SNAP, TANF, and FDPIR. Under CEP, the reimbursement is determined by the percentage of meals reimbursed at the free rate (i.e., claiming percentage); the claiming percentage is determined by the ISP multiplied by a factor of 1.6. All other meals which are served free and not included in the claimed percentage are reimbursed at the paid meals rate. Any costs for serving these meals in excess of the Federal reimbursement must be paid from non-Federal sources, as previously mentioned.<sup>98</sup>

### *Revenue from Nonprogram Foods*

The nonprogram food provisions of the HHFKA (Section 206) require that all revenue derived from the sale of non-reimbursable meals be at least equivalent to the cost of those foods. Nonprogram food includes any food sold in a participating school other than a reimbursable meal and purchased using funds from a school's foodservice account. Nonprogram foods include à la carte items sold in competition with school meals, adult meals, items purchased for fund raisers, vending machines, school stores, and items purchased for catering and vended meals. These provisions specify that revenues generated from the sale of nonprogram foods at least equal the same proportion as they contribute to SFA food costs.<sup>99</sup>

<sup>97</sup> Participation in CEP is covered in Section 3 of this report.

<sup>98</sup> USDA, FNS. 2014. "SP 21-2014: Community Eligibility Provision: Guidance and Q&As." Published February 25. <http://www.fns.usda.gov/sites/default/files/cn/SP21-2014v2os.pdf>.

<sup>99</sup> See Section 206, Revenue from Nonprogram Food (NSLP) of the Healthy, Hunger-Free Kids Act of 2010.

In summary, SFAs need to consider legislative provisions, such as the PLE and the nonprogram food provisions from the HHFKA, reimbursement rates, and economic conditions in determining school meal prices. The remainder of this section analyzes and interprets meal pricing data collected from the past five years through SY 2013–14 in the context of these considerations.

### 8.1.2 Research Questions

The following research questions are addressed in this section:

- What is the average price charged for full-price, reduced-price, and adult breakfasts and lunches for SY 2013–14?
- What actions did SFAs take in response to the PLE?
- What non-Federal revenue sources did SFAs use to mitigate potential price increases in paid meals?
- What was the weighted average price of paid NSLP meals in the current school year?
- How many SFAs have increased à la carte prices over the past year? For what types of foods have prices increased? How much have prices increased?

### 8.1.3 Results

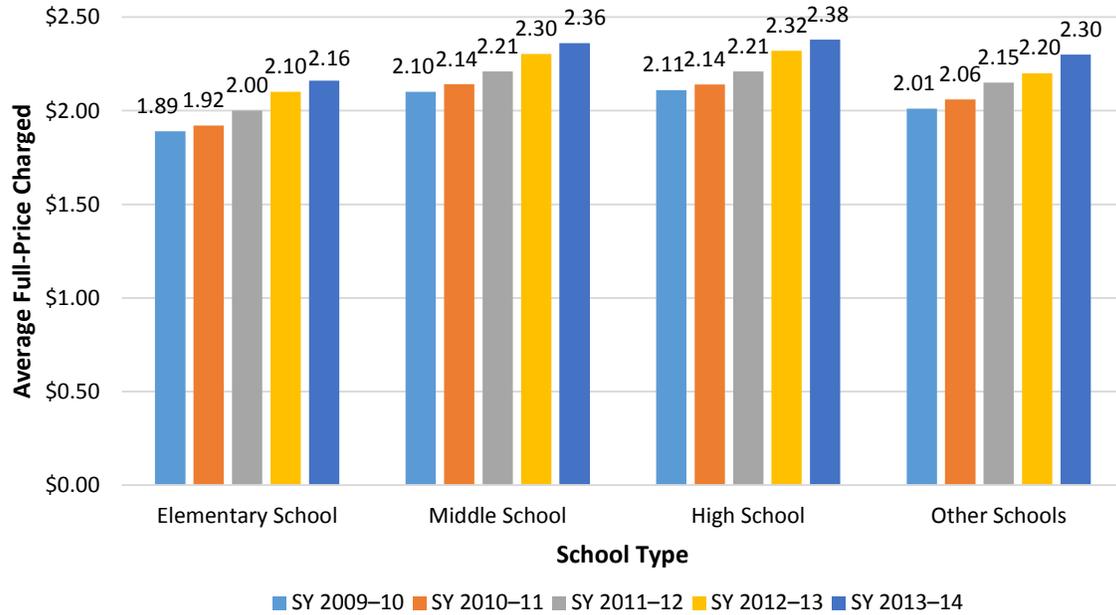
#### *Meal Prices from SY 2009–10 to SY 2013–14*

This section shows that the average price of both full-price breakfasts and full-price lunches increased significantly from SY 2009–10 to SY 2013–14. Moreover, schools in suburban areas and cities as well as schools with low poverty levels consistently had the highest prices, while those in rural areas and those with high poverty levels had the lowest prices. SFA size also mattered; for elementary, middle, and high schools, those in small SFAs and those in very large SFAs tended to have the lowest prices, while those in more mid-sized SFAs tended to have higher prices. This finding was slightly different for other schools with non-traditional grade structures: for these schools, those in very large SFAs had the highest prices and those in mid-sized SFAs had the lowest prices.

*FIGURE 8.1* and *FIGURE 8.2* show the overall trend in average prices for full-price lunches and full-price breakfasts by school type, respectively. Overall, from SY 2009–10 through SY 2013–14, prices increased from between 12 to 15 percent, depending on school type. This is somewhat higher than the percentage change in the Consumer Price Index for All Urban Consumers, which increased by approximately 9 percent from 217.7 in September of 2009 to 237.3 in September of 2013.<sup>100</sup>

<sup>100</sup> Figures retrieved from USDOL, BLS. N.D. “Consumer Price Index: Archived Consumer Price Index Detailed Report Information, 2013 Consumer Price Index Detailed Report Tables.” Accessed January 29, 2016. [http://www.bls.gov/cpi/cpi\\_dr.htm#2013](http://www.bls.gov/cpi/cpi_dr.htm#2013).

FIGURE 8.1 *Average Price Charged by SFAs for a Full-Price Student Lunch, by School Type (SY 2009–10 to SY 2013–14)*



<sup>1</sup> Difference between SY 2009–10 and SY 2010–11 is significant.

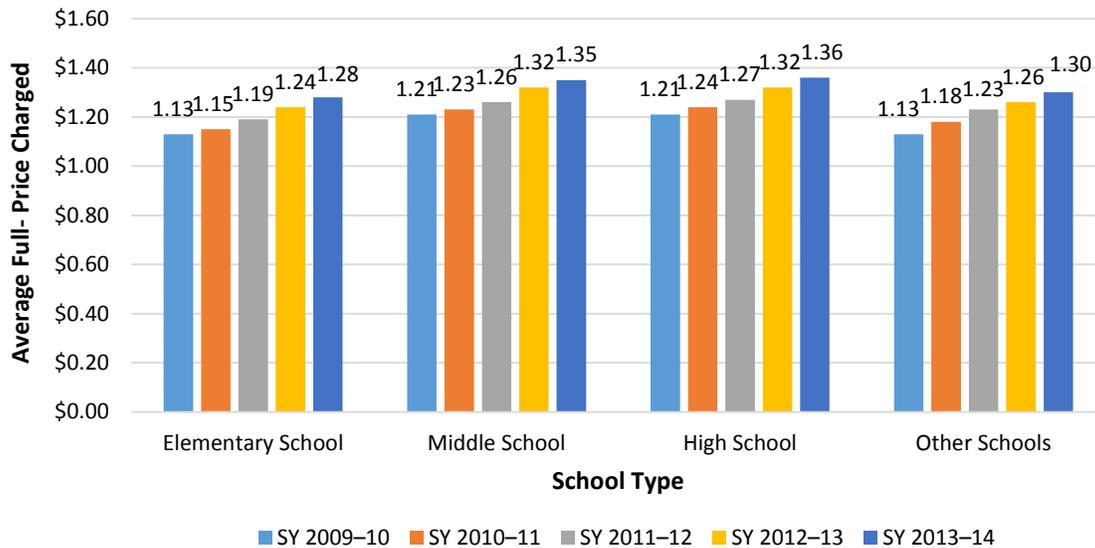
<sup>2</sup> Difference between SY 2010–11 and SY 2011–12 is significant.

<sup>3</sup> Difference between SY 2011–12 and SY 2012–13 is significant.

<sup>4</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Director Survey SY 2011–12, questions 5.4, 5.5a, and 5.5b; SFA Director Survey SY 2012–13, question 6.6; SFA Director Survey SY 2013–14, questions 6.2 and 6.5.

FIGURE 8.2 Average Price Charged by SFAs for a Full-Price Student Breakfast, by School Type (SY 2009–10 to SY 2013–14)



<sup>1</sup> Difference between SY 2009–10 and SY 2010–11 is significant.

<sup>2</sup> Difference between SY 2010–11 and SY 2011–12 is significant.

<sup>3</sup> Difference between SY 2011–12 and SY 2012–13 is significant.

<sup>4</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Director Survey SY 2011–12, questions 5.1, 5.2a, and 5.2b; SFA Director Survey SY 2012–13, question 6.1; SFA Director Survey SY 2013–14, question 6.1.

TABLE 8.2 shows the average price charged by SFAs for a full-price lunch by grade level and SFA characteristics, including SFA size, location, and poverty level. Note that all price increases were statistically significant. Additionally, in SY 2013–14, average prices in SFAs with elementary, middle, and high schools differed significantly by urbanicity and poverty level. For all school types, higher average paid lunch prices were reported by SFAs located in suburban locales (\$2.34, \$2.53 and \$2.60, respectively). Lower paid lunch prices for SFAs with elementary, middle, and high schools were present in rural communities (\$2.05, \$2.24 and \$2.25, respectively). The highest lunch prices were in low-poverty SFAs: \$2.37 in elementary schools, \$2.63 in middle schools, and \$2.66 in high schools. SFAs with high poverty levels charged the lowest prices: \$2.02 in elementary schools, \$2.14 in middle schools, and \$2.17 in high schools. SFAs exhibited significant differences by urbanicity for other schools in SY 2013–14 as well, with the higher prices (\$2.44) in both city and suburban areas (TABLE 8.3).

In SY 2012–13, significant differences were also observed across SFA characteristics by school type. SFAs with medium and large size elementary schools had significantly higher prices (\$2.12) than SFAs with small and very large schools, and SFAs with schools with low poverty levels had the highest average price (\$2.36). The lowest average paid lunch prices were observed in SFAs with elementary schools with

small SFA size (\$2.08) and those with high poverty levels (\$1.96). While not statistically significant, higher average paid lunch prices for elementary schools were found in SFAs in city locales (\$2.37) and lower prices were associated with rural communities (\$1.98).

For both middle and high schools, significant differences were observed by SFA size and poverty level in SY 2012–13. Medium and large-sized SFAs reported the highest average paid lunch prices in these grade levels. For middle schools, the associated price was \$2.34. For high schools, the corresponding prices were \$2.36–\$2.40. SFAs with middle schools and high schools in low-poverty locations also reported higher paid lunch prices (\$2.58 and \$2.61, respectively).

Consistent with the findings for elementary schools, significantly lower prices for paid lunches in middle and high schools were associated with small SFA size and SFAs with high poverty levels. SFAs with small middle and high schools reported an average paid lunch price of \$2.23. SFAs with middle schools with high poverty levels reported \$2.09 as their average paid lunch price, with SFAs with high schools in high poverty levels reporting \$2.11 in SY 2012–13. Only middle schools exhibited significant differences in average paid lunch prices by urbanicity: higher and lower prices were associated with suburban (\$2.50) and rural (\$2.18) settings, respectively.

TABLE 8.3 shows the average price charged for a paid lunch in schools with a non-traditional grade structure. Significant differences are reported across SFA size and poverty level. The highest paid lunch prices in SY 2012–13 were more likely to exist in very large SFAs (\$2.35) and those with low poverty levels (\$2.53). The lowest prices occurred in medium sized SFAs (\$2.18) and SFAs with high poverty levels (\$2.03).

TABLE 8.2 *Average Price Charged by SFAs for a Full-Price Student Lunch, by Grade Level (Elementary, Middle, High) and SFA Characteristics, SY 2009–10 to SY 2013–14*

SFA Characteristics	Average Price Charged by SFAs by School Grade Level and Year														
	Elementary					Middle					High				
	'09/10	'10/11	'11/12	'12/13	'13/14	'09/10	'10/11	'11/12	'12/13	'13/14	'09/10	'10/11	'11/12	'12/13	'13/14
All SFAs	\$1.89	<sup>a</sup> \$1.92	<sup>b</sup> \$2.00	<sup>c</sup> \$2.10	<sup>d</sup> \$2.16	\$2.10	<sup>a</sup> \$2.14	<sup>b</sup> \$2.21	<sup>c</sup> \$2.30	<sup>d</sup> \$2.36	\$2.11	<sup>a</sup> \$2.14	<sup>b</sup> \$2.21	<sup>c</sup> \$2.32	<sup>d</sup> \$2.38
<b>SFA Size</b> <sup>1</sup>															
Small (1–999)	1.85	1.89	1.96	2.08	2.14	2.04	2.08	2.14	2.23	2.30	2.00	2.03	2.09	2.23	2.30
Medium (1,000–4,999)	1.92	1.94	2.02	2.12	2.19	2.14	2.16	2.25	2.34	2.39	2.17	2.20	2.29	2.36	2.42
Large (5,000–24,999)	1.93	1.96	2.03	2.12	2.18	2.15	2.18	2.25	2.34	2.40	2.20	2.23	2.31	2.40	2.45
Very Large (25,000+)	1.87	1.90	1.96	2.09	2.15	2.12	2.14	2.21	2.32	2.39	2.16	2.19	2.25	2.38	2.43
<b>Urbanicity</b> <sup>2</sup>															
City	2.12	2.17	2.22	2.37	2.28	2.24	2.27	2.29	2.46	2.46	2.26	2.30	2.34	2.51	2.46
Suburban	2.09	2.13	2.21	2.31	2.34	2.33	2.36	2.44	2.50	2.53	2.38	2.42	2.51	2.58	2.60
Town	1.87	1.88	1.96	2.07	2.17	2.07	2.08	2.15	2.26	2.36	2.13	2.14	2.21	2.29	2.39
Rural	1.78	1.80	1.88	1.98	2.05	1.99	2.03	2.12	2.18	2.24	1.98	2.00	2.08	2.18	2.25
<b>Poverty Level</b> <sup>3</sup>															
Low (0–29 percent F/RP)	2.11	2.15	2.22	2.36	2.37	2.34	2.38	2.48	2.58	2.63	2.34	2.38	2.45	2.61	2.66
Medium (30–59 percent F/RP)	1.88	1.90	1.98	2.07	2.15	2.09	2.12	2.19	2.29	2.35	2.10	2.13	2.20	2.29	2.36
High (60 percent or higher F/RP)	1.71	1.73	1.81	1.96	2.02	1.90	1.91	1.97	2.09	2.14	1.91	1.93	2.01	2.11	2.17

<sup>1</sup> The average price charged for lunch in elementary, middle, and high schools in SY 2012–13 differed significantly by SFA size. The average price charged for lunch in elementary schools in SY 2013–14 differed significantly by SFA size.

<sup>2</sup> The average price charged for lunch in middle school in SY 2012–13 differed significantly by urbanicity. The average price charged for lunch in elementary, middle, and high schools in SY 2013–14 differed significantly by urbanicity.

<sup>3</sup> The average price charged for lunch in elementary, middle, and high schools in SY 2012–13 differed significantly by poverty level. The average price charged for lunch in elementary, middle, and high schools in SY 2013–14 differed significantly by poverty level.

<sup>a</sup> Difference between SY 2009–10 and SY 2010–11 is significant.

<sup>b</sup> Difference between SY 2010–11 and SY 2011–12 is significant.

<sup>c</sup> Difference between SY 2011–12 and SY 2012–13 is significant.

<sup>d</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Director Survey SY 2011–12, questions 5.4, 5.5a, and 5.5b; SFA Director Survey SY 2012–13, question 6.6; SFA Director Survey SY 2013–14, question 6.2.

TABLE 8.3 *Average Price Charged by SFAs for a Full-Price Student Lunch in Other Schools by SFA Characteristics, SY 2009–10 to SY 2013–14*

SFA Characteristics	Average Price Charged by SFAs in Other Schools				
	School Year				
	'09/10	'10/11	'11/12	'12/13	'13/14
All SFAs	\$2.01	<sup>a</sup> \$2.06	<sup>b</sup> \$2.15	<sup>c</sup> \$2.20	<sup>d</sup> \$2.30
<b>SFA Size<sup>1</sup></b>					
Small (1–999)	2.01	2.11	2.20	2.20	2.31
Medium (1,000–4,999)	1.99	2.02	2.11	2.18	2.24
Large (5,000–24,999)	2.01	2.04	2.13	2.22	2.35
Very Large (25,000+)	2.07	2.10	2.17	2.35	2.41
<b>Urbanicity<sup>2</sup></b>					
City	2.05	2.33	2.41	2.42	2.44
Suburban	2.26	2.30	2.40	2.41	2.44
Town	2.01	2.03	2.13	2.22	2.31
Rural	1.90	1.92	2.01	2.11	2.17
<b>Poverty Level<sup>3</sup></b>					
Low (0–29 percent F/RP)	2.14	2.28	2.37	2.53	2.57
Medium (30–59 percent F/RP)	2.01	2.04	2.13	2.21	2.26
High (60 percent or higher F/RP)	1.92	1.94	2.02	2.03	2.22

<sup>1</sup> The average price charged for lunch in other schools in SY 2012–13 differed significantly by SFA size.

<sup>2</sup> The average price charged for lunch in other schools in SY 2013–14 differed significantly by urbanicity.

<sup>3</sup> The average price charged for lunch in other and all schools in SY 2012–13 and SY 2013–14 differed significantly by poverty level.

<sup>a</sup> Difference between SY 2009–10 and SY 2010–11 is significant.

<sup>b</sup> Difference between SY 2010–11 and SY 2011–12 is significant.

<sup>c</sup> Difference between SY 2011–12 and SY 2012–13 is significant.

<sup>d</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Director Survey SY 2011–12, questions 5.4, 5.5a, and 5.5b; SFA Director Survey SY 2012–13, question 6.6; SFA Director Survey SY 2013–14, question 6.2 and 6.5.

The average price charged by SFAs for full-priced student breakfast from SY 2009–10 to SY 2013–14 is shown in TABLE 8.4, by school type and SFA characteristics. All SFAs reported increases for full-price student breakfasts across all school types (elementary, middle, and high) for each of the past five school years, with significant differences observed between SY 2010–11, SY 2011–12, SY 2012–13, and SY 2013–14. On average, all SFAs charged similar prices in middle and high schools for full-price breakfasts; elementary school prices were seven to eight cents lower. Beginning in SY 2010–11, SFAs reported that average prices charged in other schools were consistently lower than those in middle and high schools, but higher than elementary schools.

In SY 2013–14, paid breakfast prices differed significantly among SFAs with elementary schools by poverty level. The highest prices were observed in elementary schools in low poverty SFAs (\$1.38), while the lowest prices were reported in those SFAs having high poverty levels (\$1.19).

SFAs reported significant differences by urbanicity in middle and high schools, and significant differences by poverty level across all school types in SY 2013–14. In all grade levels, low poverty levels were associated with higher average paid breakfast prices (\$1.38, \$1.47 and \$1.53, respectively, for elementary, middle, and high schools). In addition, SFAs in city locales were more likely to report higher prices in middle schools (\$1.41), while SFAs located in suburban areas reported higher prices in high schools (\$1.47).

In SY 2013–14, the average price charged for full-price breakfasts in other schools differed significantly by SFA urbanicity and poverty level (TABLE 8.5). Suburban SFA locale and low poverty level were associated with the highest average price for paid breakfasts (\$1.37 and \$1.57, respectively). Consistently, lower prices were observed in other schools in rural locales and with high poverty levels (\$1.22 and \$1.23, respectively). SFA size was not a significant factor in observed price differences.

SFAs reported similar differences among grade levels in SY 2012–13 (TABLE 8.4). Average elementary school prices were significantly different by SFA urbanicity and poverty level in SY 2012–13. The highest average paid breakfast prices were found in SFAs located in cities with low poverty levels (\$1.37 and \$1.33, respectively). As in SY 2013–14, middle and high schools with low poverty levels were associated with higher average paid breakfast prices (\$1.46 and \$1.49, respectively). Middle schools in city locales and high schools in suburban locales were more likely to have higher average paid breakfast prices (\$1.47 and \$1.45, respectively).

For other schools, SFAs reported significant differences across SFA size and poverty level in SY 2012–13 (TABLE 8.5). The highest average price charged by SFAs for a full-price breakfast was associated with very large SFA size and low poverty levels (\$1.31 and \$1.52, respectively). Price differences were not found to be significant by urbanicity during SY 2012–13.

Across most school years, medium and large size SFAs, suburban locales, and low poverty levels were associated with higher average prices charged for full-priced breakfasts. Lower prices were more likely to occur in small SFAs, in SFAs located in rural areas, and in SFAs with higher poverty levels (TABLE 8.4). Other schools exhibited slightly dissimilar price associations than elementary, middle, and high school grade levels; for these schools, lower average paid breakfast prices occurred in SFAs of medium and large size, while small and very large SFAs were more likely to charge higher prices (TABLE 8.5).

TABLE 8.4 *Average Price Charged by SFAs for a Full-Price Student Breakfast, by Grade Level and SFA Characteristics, SY 2009–10 to SY 2013–14 (Elementary, Middle, High)*

SFA Characteristics	Average Price Charged by SFAs by School Grade Level and Year														
	Elementary					Middle					High				
	'09/10	'10/11	'11/12	'12/13	'13/14	'09/10	'10/11	'11/12	'12/13	'13/14	'09/10	'10/11	'11/12	'12/13	'13/14
All SFAs	\$1.13	<sup>a</sup> \$1.15	<sup>b</sup> \$1.19	<sup>c</sup> \$1.24	<sup>d</sup> \$1.28	\$1.21	<sup>a</sup> \$1.23	<sup>b</sup> \$1.26	<sup>c</sup> \$1.32	<sup>d</sup> \$1.34	\$1.21	<sup>a</sup> \$1.24	<sup>b</sup> \$1.27	<sup>c</sup> \$1.32	<sup>d</sup> \$1.36
<b>SFA Size</b> <sup>1</sup>															
Small (1–999)	1.12	1.14	1.17	1.24	1.29	1.20	1.23	1.24	1.34	1.34	1.17	1.20	1.22	1.29	1.34
Medium (1,000–4,999)	1.15	1.17	1.21	1.25	1.28	1.21	1.23	1.27	1.31	1.35	1.24	1.25	1.30	1.34	1.37
Large (5,000–24,999)	1.12	1.14	1.17	1.22	1.24	1.21	1.24	1.26	1.30	1.33	1.24	1.26	1.28	1.33	1.36
Very Large (25,000+)	1.10	1.13	1.16	1.21	1.22	1.19	1.23	1.25	1.29	1.32	1.21	1.24	1.27	1.32	1.34
<b>Urbanicity</b> <sup>2</sup>															
City	1.24	1.23	1.31	1.37	1.34	1.26	1.27	1.29	1.47	1.41	1.27	1.29	1.32	1.42	1.38
Suburban	1.16	1.21	1.23	1.28	1.30	1.27	1.31	1.32	1.36	1.39	1.34	1.39	1.41	1.45	1.47
Town	1.16	1.18	1.21	1.21	1.28	1.20	1.21	1.25	1.27	1.36	1.21	1.22	1.26	1.29	1.36
Rural	1.09	1.11	1.14	1.21	1.24	1.18	1.20	1.23	1.29	1.30	1.16	1.17	1.21	1.26	1.30
<b>Poverty Level</b> <sup>3</sup>															
Low (0–29 percent F/RP)	1.21	1.26	1.28	1.33	1.38	1.32	1.36	1.38	1.46	1.47	1.35	1.39	1.42	1.49	1.53
Medium (30–59 percent F/RP)	1.13	1.15	1.19	1.24	1.27	1.21	1.23	1.27	1.30	1.34	1.20	1.23	1.26	1.31	1.35
High (60 percent or higher F/RP)	1.07	1.07	1.10	1.18	1.19	1.12	1.12	1.13	1.25	1.23	1.11	1.12	1.13	1.22	1.24

<sup>1</sup> The average price charged for breakfast in elementary, middle, and high schools in SY 2013–14 differed significantly by SFA size.

<sup>2</sup> The average price charged for breakfast in elementary, middle, and high schools in SY 2012–13 differed significantly by urbanicity. The average price charged for breakfast in elementary, middle, and high in SY 2013–14 differed significantly by urbanicity.

<sup>3</sup> The average price charged for breakfast in elementary, middle, and high schools in SY 2012–13 differed significantly by poverty level. The average price charged for breakfast in elementary, middle, and high in SY 2013–14 differed significantly by poverty level.

<sup>a</sup> Difference between SY 2009–10 and SY 2010–11 is significant.

<sup>b</sup> Difference between SY 2010–11 and SY 2011–12 is significant.

<sup>c</sup> Difference between SY 2011–12 and SY 2012–13 is significant.

<sup>d</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Director Survey SY 2011–12, questions 5.1, 5.2a, and 5.2b; SFA Director Survey SY 2012–13, question 6.1; SFA Director Survey SY 2013–14, question 6.1.

TABLE 8.5 *Average Price Charged by SFAs for a Full-Price Student Breakfast in Other Schools, by SFA Characteristics, SY 2009–10 to SY 2013–14 (Other Schools)*

SFA Characteristics	Average Price Charged by SFAs in Other Schools				
	School Year				
	'09/10	'10/11	'11/12	'12/13	'13/14
All SFAs	\$1.13	<sup>a</sup> \$1.18	<sup>b</sup> \$1.23	<sup>c</sup> \$1.26	<sup>d</sup> \$1.30
<b>SFA Size</b> <sup>1</sup>					
Small (1–999)	1.09	1.18	1.24	1.26	1.32
Medium (1,000–4,999)	1.18	1.20	1.26	1.27	1.27
Large (5,000–24,999)	1.13	1.16	1.17	1.23	1.29
Very Large (25,000+)	1.15	1.18	1.21	1.31 <sup>c</sup>	1.30
<b>Urbanicity</b> <sup>2</sup>					
City	1.15	1.40	1.46	1.47	1.36
Suburban	1.20	1.24	1.26	1.29	1.37
Town	1.16	1.18	1.24	1.28	1.30
Rural	1.09	1.12	1.16	1.22	1.22
<b>Poverty Level</b> <sup>3</sup>					
Low (0–29 percent F/RP)	1.29	1.50	1.52	1.52	1.57
Medium (30–59 percent F/RP)	1.12	1.14	1.20	1.28	1.27
High (60 percent or higher F/RP)	1.07	1.09	1.11	1.12	1.23

<sup>1</sup>The average price charged for breakfast in other schools in SY 2012–13 and SY 2013–14 differed significantly by SFA size.

<sup>2</sup>The average price charged for breakfast in other schools in SY 2013–14 differed significantly by urbanicity.

<sup>3</sup>The average price charged for breakfast in other schools in SY 2012–13 and SY 2013–14 differed significantly by poverty level.

<sup>a</sup> Difference between SY 2009–10 and SY 2010–11 is significant.

<sup>b</sup> Difference between SY 2010–11 and SY 2011–12 is significant.

<sup>c</sup> Difference between SY 2011–12 and SY 2012–13 is significant.

<sup>d</sup> Difference between SY 2012–13 and SY 2013–14 is significant.

**Source:** SFA Director Survey SY 2011–12, questions 5.1, 5.2a, and 5.2b; SFA Director Survey SY 2012–13, question 6.1; SFA Director Survey SY 2013–14, question 6.1.

### *Effect of Paid Lunch Equity Provision*

Results in this section suggest the PLE may have caused schools to increase prices for both paid lunches and breakfasts in order to achieve WAP levels. The percentage of SFAs implementing price increases went up after the implementation of the PLE. Elementary, middle, and high schools increased prices at slightly lower rates than schools with non-traditional grade structures, on average. In the final period of study (SY 2012–13 to SY 2013–14), the percentage of SFAs implementing price increases went down as did the average price of lunch, even though all grade levels did not meet the WAP. This suggests that SFAs may have turned to alternative strategies to finance school lunches after initially choosing to increase prices; however, this is just one potential explanation for the decrease, and others are presented below.

The lower number of SFAs implementing price increases could also be the result of some SFAs being exempt from the PLE requirements—if the SFAs were certified as meeting the meal pattern requirements, as well as demonstrating that the required increase to the paid lunch prices or revenue contributions would cause the SFA to exceed the three-months average expenditures limit. As previously mentioned (in the Background section), the school foodservice account must be nonprofit

and SFAs must not exceed any three-month average expenditure amount in their account. Another reason for a decrease in SFAs implementing meal prices may reflect a scenario in which some SFAs opted to increase the paid lunch prices more than required by the PLE in the prior year, which resulted in those SFAs not having to raise their prices in SY 2013–14. Finally, the decrease could reflect that more SFAs are implementing CEP district-wide and are not required to address PLE. TABLE 8.6 shows average paid meal prices for breakfasts and lunches from SY 2009–10 to SY 2013–14 along with reimbursement rates. Average paid breakfast prices were highest for middle and high schools in each school year, and WAP levels were either met or exceeded in all cases. Prices for elementary schools remained beneath WAP levels.

FIGURE 8.3 shows that the percentage change in average paid breakfast and lunch prices for all grade levels was generally higher in SY 2012–13 and SY 2013–14 when compared to previous years. Also shown in FIGURE 8.3 are inflation levels from SY 2009–10 to SY 2012–13. As mentioned earlier in this section, SFAs must increase prices by 2 percent plus the rate of inflation each year until WAP levels specified by the PLE are reached. From SY 2009–10 to SY 2010–11, the percentage change in average lunch and breakfast prices increased from levels lower than the required 2 percent plus inflation rate to eventually exceed the PLE threshold across SY 2011–12 and SY 2012–13.

By SY 2011–12, at the inception of the PLE, average paid lunch and breakfast prices were already increasing at a faster rate (3.5 and 2.5 percent, respectively) than previously and the percentage change in lunch prices exceeded the 2 percent expected change in addition to inflation. FIGURE 8.3 also shows a sharp decline in the percentage change in average lunch prices between SY 2011–12 and SY 2012–13, while breakfast prices continue to increase at a slower rate.

Changes in average meal prices are at least partially correlated with the required price increase of 2 percent plus inflation. The decline in the percentage change in average lunch prices (FIGURE 8.3) could indicate a direct pricing response to the steady decrease in inflation, occurring across all school years following SY 2010–11 (3.2 to 1.5 percent). However, the decrease in average lunch price increases may also suggest that SFAs are approaching WAP-level pricing for paid meals. The PLE requires that SFAs participating in the NSLP ensure sufficient funds are provided to the nonprofit foodservice account for paid meals.<sup>101</sup> Steady increases in average paid meal prices may continue until WAP levels are achieved; however, it is important to note that WAP levels may also be achieved using non-Federal sources, rather than explicit paid meal price increases, and that meal price fluctuations are associated with a number of variables (for example, food costs).

FIGURE 8.4 illustrates the differences between the average price for paid lunches and WAP levels, and between free and paid lunch reimbursement rates. Free lunch reimbursement rates have steadily increased from \$2.68 in SY 2009–10 to \$2.93 in SY 2013–14. Paid lunch reimbursement rates have remained relatively static. If these rates continue to diverge, WAP levels will subsequently increase, and may continue to fluctuate. As mentioned previously, the PLE allows SFAs to use alternatives to paid meal price increases to achieve WAP levels.

<sup>101</sup> USDA, FNS. 2015. "SP 03-2015 – Revised: Paid Lunch Equity: School Year 2015-2016 Calculations and Tool." Published July 6. <http://www.fns.usda.gov/sites/default/files/cn/SP03-2015ros.pdf>.

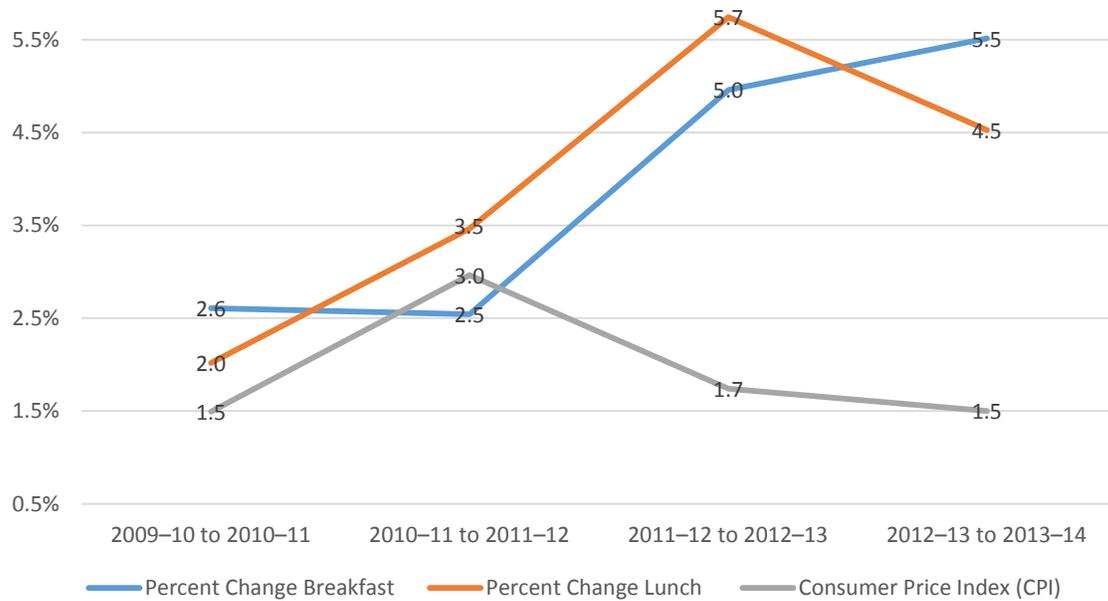
Indeed, from FIGURE 8.3, price increases appear to have slowed in SY 2013–14, even though all grade levels remain beneath the WAP target, as shown in FIGURE 8.4. A number of factors may have influenced this outcome. For instance, it is possible that SFAs elected to decrease or maintain stable paid meal prices and instead sought additional revenues using non-Federal funds. The PLE also grants exemptions to SFAs certified as meeting the updated meal pattern requirements. Eligible SFAs must also be in strong financial standing, and demonstrate that the required increase to their paid lunch prices would result in revenues that exceed the three-months average expenditures limit.

TABLE 8.6 *NSLP and SBP Reimbursement Rates for Free School Meals and Average Prices for Paid Meals, SY 2009–10 to SY 2013–14*

	SY 2009–10	SY 2010–11	SY 2011–12	SY 2012–13	SY 2013–14
	Reimbursement Rate for Free Meals				
Breakfast	\$1.46	\$1.48	\$1.51	\$1.55	\$1.58
Lunch	2.68	2.72	2.77	2.86	2.93
	Average Paid Meal Prices				
<b>Elementary</b>					
Breakfast	1.13	1.15	1.19	1.24	1.28
Lunch	1.89	1.92	2.00	2.10	2.16
<b>Middle</b>					
Breakfast	1.21	1.23	1.26	1.32	1.35
Lunch	2.10	2.14	2.21	2.30	2.36
<b>High</b>					
Breakfast	1.21	1.24	1.27	1.32	1.36
Lunch	2.11	2.14	2.21	2.32	2.38
<b>All Schools</b>					
Breakfast	1.15	1.18	1.21	1.27	1.34
Lunch	1.98	2.02	2.09	2.21	2.31

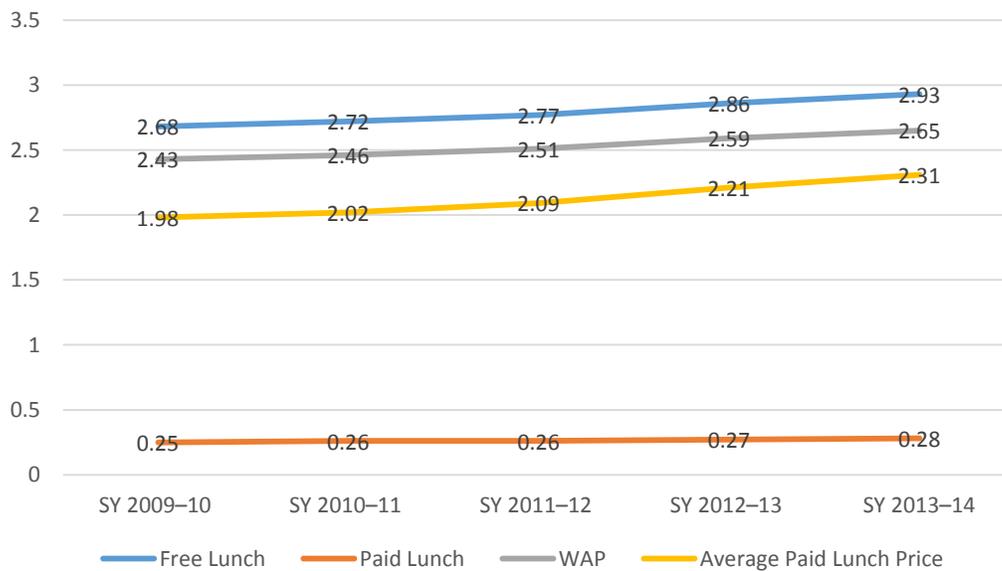
Source: <http://www.fns.usda.gov/school-meals/rates-reimbursement>; SFA Director Survey SY 2011–12, questions 5.1, 5.2, 5.4, and 5.5; SFA Director Survey SY 2012–13, questions 6.1 and 6.6; SFA Director Survey SY 2013–14, questions 6.1 and 6.2.

FIGURE 8.3 *Percent Change in Breakfast Prices, Lunch Prices, and the Consumer Price Index, SY 2009–10 to SY 2013–14*



**Source:** [www.bls.gov/cpi](http://www.bls.gov/cpi); SFA Director Survey SY 2011–12, questions 5.1, 5.2, 5.4, and 5.5; SFA Director Survey SY 2012–13, questions 6.1 and 6.6; SFA Director Survey SY 2013–14, questions 6.1 and 6.2.

FIGURE 8.4 *Reimbursement Rates for Free/Paid Lunches, Weighted Average Price, and Average Paid Lunch Price, SY 2011–12 to SY 2013–14*



Source: <http://www.fns.usda.gov/school-meals/rates-reimbursement>; SFA Director Survey SY 2013–14, question 6.2.

TABLE 8.7 presents a summary of the mean, median, and modal price increases implemented by SFAs for paid student lunches and breakfasts by survey year. Price increases are analyzed using the mean, median, and mode, as these measures of central tendency provide different analytical benefits. The mean provides an average of all observed price increases so that the national average price increase can be assessed. The median is the value that falls in the middle of meal price increases; this measure is not influenced by outliers and may provide a more accurate assessment for the Nation. The mode is the value with the greatest frequency; this measure identifies the value that the majority of schools had to increase their prices by in order to achieve the WAP.

Starting in SY 2009–10 to SY 2010–11, the percentage of SFAs that increased prices was relatively low. This percentage increased, however, in the next two comparison periods, with over 60 percent of SFAs reporting raising lunch prices from SY 2011–12 to SY 2012–13. For SY 2012–13 to SY 2013–14 (the final comparison period), over 50 percent of SFAs raised lunch prices. This pattern is approximately the same for breakfast, but the overall percentage of SFAs that raised breakfast prices is lower (second column) when compared to lunch (first column).

With the exception of SFAs operating other school types in SY 2009–10 to SY 2010–11, and the 24 cent mean increase for breakfast in middle schools from SY 2012–13 to SY 2013–14, the mean increases in school meals were less than 20 cents in every period. Moreover, the median increase was usually 10 cents or 15 cents, confirming that some of the means were influenced by a few unusually high values. Modal price increases were generally 5 or 10 cents after the first comparison period, reflecting the fact

that most SFAs chose to limit the price increases to 10 cents, the maximum required increase under HHFKA.

TABLE 8.7 *Summary of Price Increases for Full-Price Student Breakfasts and Lunches, SY 2009–10 to SY 2013–14*

	Percentage of SFAs that Increased Prices <sup>1</sup>		Mean Increase <sup>2</sup>		Median Increase <sup>2</sup>		Modal Increase <sup>2</sup>	
	Lunch	Breakfast	Lunch	Breakfast	Lunch	Breakfast	Lunch	Breakfast
<b>2009–10 to 2010–11 (Year 1 to Year 2)</b>								
Elementary	15.5	12.5	\$.19	\$.16	\$.15	\$.10	\$.25	\$.25
Middle	16.6	12.9	.17	.15	.15	.10	.25	.25
High	16.1	12.9	.18	.17	.15	.10	.25	.25
Other	15.9	13.5	.33	.36	.25	.15	.25	.25
<b>2010–11 to 2011–12 (Year 2 to Year 3)</b>								
Elementary	55.2	26.2	.14	.15	.10	.10	.10	.05
Middle	55.4	25.8	.14	.14	.10	.10	.10	.05
High	55.9	24.8	.14	.15	.10	.10	.10	.05
Other	55.1	29.2	.17	.17	.10	.10	.10	.25
<b>2011–12 to 2012–13 (Year 3 to Year 4)</b>								
Elementary	63.3	29.2	.14	.15	.10	.10	.10	.05
Middle	60.5	29.3	.15	.17	.10	.10	.10	.05
High	60.8	29.1	.15	.16	.10	.10	.10	.05
Other	54.5	29.4	.26	.23	.17	.17	.10	.25
<b>2012–13 to 2013–14 (Year 4 to Year 5)</b>								
Elementary	56.3	26.1	.16	.18	.10	.10	.10	.10
Middle	52.6	27.0	.16	.24	.10	.10	.10	.10
High	54.4	27.4	.16	.21	.10	.10	.10	.10
Other	50.3	30.3	.19	.17	.10	.10	.10	.10

<sup>1</sup> Based on SFAs that provided price data in a given pair of years.

<sup>2</sup> Based on SFAs that reported a price increase.

**Note:** Mean price increases reflect the average of total price increases implemented by all SFAs; modal price increases reflect the increase most frequently implemented among all SFAs; median price increases reflect the ‘center’ or ‘middle’ price in the distribution of all price increases implemented among all SFAs.

**Source:** SFA Director Survey SY 2011–12, questions 5.1, 5.2a, 5.2b, 5.4, 5.5a, and 5.5b; SFA Director Survey SY 2012–13, questions 6.1 and 6.6; SFA Director Survey SY 2013–14, questions 6.1 and 6.2.

### *Factors That May Have Influenced Meal Pricing Decisions*

Multiple factors may have influenced the changes observed in meal prices each school year, including annual inflation rates and economic conditions, as well as updated regulations and provisions set forth by HHFKA, such as the PLE and updated meal pattern requirements.

FIGURE 8.3, above, shows that the percentage change in average paid meal price increased for breakfasts and declined for lunches for all schools from SY 2012–13 to SY 2013–14. Inflation levels for SY 2009–10 to SY 2012–13 are also shown in FIGURE 8.3. As mentioned earlier, SFAs must increase prices by 2 percent plus the rate of inflation each year until WAP levels specified by the PLE are reached. FIGURE 8.3 may demonstrate that SFAs are implementing this policy. From SY 2009–10 to SY 2010–11, the percentage change in average lunch and breakfast prices increased from levels lower than inflation to eventually converge with and then exceed the CPI.

Meal prices may also reflect changes in reimbursement rates. The USDA makes annual adjustments to the *national average payments*, the maximum Federal reimbursement rates SAs may receive for meals served in the NSLP and the SBP.<sup>102</sup> These adjustments are initiated each year on July 1 and are based on changes in the CPI.<sup>103</sup> As the economy contracts in periods of recession, the CPI increases, while the index decreases in times of economic expansion.

#### *Actions SFAs Have Taken in Response to the Paid Lunch Equity Provision*

In addition to explicitly raising the price of paid lunches to achieve revenue levels set by the PLE, SFAs may instead elect to use any of the following approved, non-Federal funds:

1. Per-meal non-Federal reimbursement for any paid meal (breakfast, lunch, etc.) by State and local sources;
2. Any funds provided by organizations, such as school-related or community groups, to support any paid meals;
3. Any portion of State revenue-matching funds that exceeds the minimum requirement for paid meals; and
4. Any proportion attributable to paid meals from direct payments made from school district funds to support lunch service.

#### *Actions Taken by SFAs With Pricing Lower Than WAP Levels Specified by the Paid Equity Lunch Provision*

TABLE 8.8 shows the actions taken by SFAs that had not reached the WAP level pricing specified in the PLE. In SY 2013–14, fewer SFAs chose to increase prices only (30 percent). A larger number of SFAs chose to respond by using a combination of both price increases and non-Federal funds or other actions (30 and 34 percent, respectively).

Significantly different behavior was observed in SY 2012–13. Most SFAs that took actions to respond to the PLE (64 percent) chose to only increase prices, while 20 percent of SFAs used a combination of price increases and non-Federal funds.

<sup>102</sup> USDA, FNS. 2015. "National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates." Published July 17. <http://www.fns.usda.gov/sites/default/files/cn/NAPS15-16nslp.pdf>.

<sup>103</sup> USDA, FNS. 2015. "School Meals: Rates of Reimbursement." Last modified July 20, 2015. <http://www.fns.usda.gov/school-meals/rates-reimbursement>.

In SY 2013–14, SFAs were equally likely to respond to the PLE by using price increases only and by using both price increases and non-Federal funds; approximately 30 percent of SFAs reported taking these actions. This suggests that SFAs may have elected to distribute compensation across multiple revenue options in an effort to reach WAP levels. In SY 2012–13, 64 percent of SFAs responded to the PLE with price increases, while only 20 percent of SFAs used both price increases and non-Federal funds.

In SY 2013–14, 86 percent of the SFAs that reported taking other actions specified that they did not address the PLE. Nine percent of SFAs that reported taking other actions obtained an exemption (not reflected in the table).

For both school years, the majority of SFAs that reported taking other actions specified that they took no action or received an exemption from raising paid meal prices. CEP should be considered in this assessment: under this provision, all breakfasts and lunches are served as free meals, and responses to the PLE are not necessarily needed.

TABLE 8.8 also shows the characteristics of SFAs working to achieve WAP levels specified in the PLE. In SY 2013–14, SFAs that chose to increase prices only were more likely to have large or very large SFA size and to have low poverty levels. Small and medium-sized SFAs—as well as those in rural locales and with medium poverty levels—used both price increases and non-Federal funds to respond to the PLE in SY 2013–14. Those SFAs that took other actions were smaller, in city locales, and had higher poverty levels.

In SY 2012–13, price increases only were associated with medium to large SFAs more than those of smaller size. Price increases only were also more likely to occur in SFAs in town or suburban locales and with medium poverty levels. SFAs implementing a combination of price increases and the acquisition of non-Federal funds were smaller, had town and rural locales, and had medium to high poverty levels. Small-sized SFAs, those in city settings, and those with high poverty levels more frequently chose to take other actions.

Excluding non-Federal funds, most actions reported in TABLE 8.8 differ significantly across SFA characteristics. The data from both SY 2012–13 and SY 2013–14 indicate that SFAs adjusted their behavior in response to the PLE between years. It appears that SFAs initially responded to the PLE by simply enacting price increases only, particularly larger SFAs with lower poverty levels. Smaller SFAs and those with medium to high poverty levels used a combination of price increases and non-Federal funds more often.

By SY 2013–14, price increases were more often used by the largest SFAs, and those with low to medium poverty levels. Higher poverty levels seemed to be the largest contributing factor for SFAs taking other pricing and funding actions (50 percent of the other category).

TABLE 8.8 Among SFAs That Reported That They Did Not Meet the Paid Lunch Equity Provision, the Percentage of SFAs That Took Various Pricing and Funding Actions, by SFA Characteristics, SY 2012–13 and SY 2013–14

SFA Characteristics	Increased Prices Only (percent)	Used Non-Federal Funds Only (percent)	Both Increased Prices and Used Non-Federal Funds (percent)	Other (percent)	Total SFAs	
					Wgtd n	Unwgtd n
<b>All SFAs<sup>1</sup></b>						
SY 2012–13	63.5	6.6	19.5	10.3	10,266	<sup>a</sup> 1,057
SY 2013–14	29.8	6.1	29.9	34.3	11,566	<sup>b</sup> 1,218
<b>SFA Size</b>						
<b>SY 2012–13<sup>2</sup></b>						
Small (1–999)	51.8	8.1	24.7	15.4	5,038	243
Medium (1,000–4,999)	74.3	5.6	15.2	4.9	3,720	397
Large (5,000–24,999)	75.6	3.7	14.4	6.3	1,264	278
Very Large (25,000+)	78.3	6.3	6.5	8.9	244	139
<b>SY 2013–14<sup>3</sup></b>						
Small (1–999)	23.5	5.1	31.4	40.0	6,079	295
Medium (1,000–4,999)	35.3	7.0	32.2	25.7	3,956	452
Large (5,000–24,999)	39.7	8.2	19.6	32.7	1,323	333
Very Large (25,000+)	44.2	6.3	9.5	40.0	209	138
<b>Urbanicity</b>						
<b>SY 2012–13<sup>4</sup></b>						
City	58.5	11.4	9.4	20.8	989	182
Suburban	72.9	7.7	12.0	7.4	1,804	267
Town	63.2	3.6	22.0	11.2	2,242	216
Rural	61.4	6.6	23.0	9.0	5,231	392
<b>SY 2013–14<sup>5</sup></b>						
City	27.5	8.7	16.4	47.5	1,119	212
Suburban	39.8	5.4	20.6	34.2	1,906	305
Town	33.0	9.3	33.1	24.9	2,059	222
Rural	29.3	4.8	36.5	29.5	5,687	432
<b>Poverty Level</b>						
<b>SY 2012–13<sup>6</sup></b>						
Low (0–29 percent F/RP)	69.7	11.8	12.9	5.6	1,777	190
Medium (30–59 percent F/RP)	68.9	5.3	22.7	3.2	5,143	509
High (60 percent or more F/RP)	52.0	6.0	18.2	23.8	3,345	358

SFA Characteristics	Increased Prices Only (percent)	Used Non-Federal Funds Only (percent)	Both Increased Prices and Used Non-Federal Funds (percent)	Other (percent)	Total SFAs	
					Wgtd <i>n</i>	Unwgtd <i>n</i>
<b>SY 2013–14<sup>7</sup></b>						
Low (0–29 percent F/RP)	34.1	4.1	30.9	31.1	2,157	247
Medium (30–59 percent F/RP)	33.9	6.5	35.6	24.2	5,416	565
High (60 percent or more F/RP)	21.8	6.7	21.8	49.7	3,992	406

<sup>1</sup> The distribution of SFAs in response the PLE provision differed significantly between SY 2012–13 and SY 2013–14.  
<sup>2</sup> The percentage of SFAs that increased prices only, both increased prices and used non-Federal funds, and used other source differed significantly by SFA size in SY 2012–13.  
<sup>3</sup> The percentage of SFAs that increased prices only, both increased prices and used non-Federal funds, and used other sources differed significantly by SFAs size in SY 2013–14.  
<sup>4</sup> The percentage of SFAs that both increased prices and used non-Federal funds differed significantly by urbanicity in SY 2012–13.  
<sup>5</sup> The percentage of SFAs that increased prices only, both increased prices and used non-Federal funds, and used other sources differed significantly by urbanicity in SY 2013–14.  
<sup>6</sup> The percentage of SFAs that increased prices only, and used other sources differed significantly by poverty level in SY 2012–13.  
<sup>7</sup> The percentage of SFAs that increased prices only, both increased prices and used non-Federal funds, and used other sources differed significantly by poverty level in SY 2013–14.  
<sup>a</sup> *n* is less than the 1,109 SFAs that did not meet the PLE provision due to item nonresponse in SY 2012–13.  
<sup>b</sup> *n* is less than the 1,253 SFAs that did not meet PLE provision due to item nonresponse in SY 2013–14.

**Source:** SFA Director Survey SY 2012–13, questions 6.11 and 6.12; SFA Director Survey SY 2013–14, questions 6.3 and 6.4.

SFAs may use a number of types of non-Federal funds to mitigate price increases. As noted in TABLE 8.8, in SY 2013–14, more SFAs that did not meet PLE minimum average price levels chose to use non-Federal fund sources in addition to price increases than in the previous school year.

Some of the most common sources of funds across all SFAs include: per-lunch reimbursements specifically for paid lunches provided by SAs (60 percent), by counties and school districts (20 percent), and by others, including funds provided by organizations for paid lunches (7 percent), any portion of SA revenue matching funds (18 percent), and direct payments from LEAs to fund any paid meal (33 percent; TABLE 8.9).

TABLE 8.9 also shows the percentage of SFAs that used various sources of non-Federal funds instead of price increases in SY 2013–14, by SFA characteristics. Non-Federal funding sources used by SFAs were not found to be significantly different by urbanicity or poverty level. The use of other non-Federal sources was found to be significantly different by SFA size. A higher percentage of small SFAs (38 percent) reported that they elected to use other non-Federal sources to mitigate price increases compared to medium (26 percent), large (27 percent), and very large SFAs (20 percent).

TABLE 8.9 *Among SFAs That Used Non-Federal Funds to Mitigate Price Increases, the Percentage That Used Various Sources of Funds, by SFA Characteristics, SY 2013–14*

SFA characteristics	Per-meal State Reimbursement for Any Paid Meals (percent)	Per-meal Local Reimbursement for Any Paid Meals (Percent)	Funds Provided by Organizations Such as Community Groups (percent)	State Revenue Matching Funds in Excess of the Minimum Requirement for Paid Lunches (percent)	Direct Payments from LEA Funds to Support Any Paid Meals (percent)	Other Non-Federal Source (percent)
All SFAs	59.9	20.4	7.2	17.9	32.8	16.4
<b>SFA Size<sup>1</sup></b>						
Small (1–999)	60.9	25.6	7.7	19.3	38.0	13.8
Medium (1,000–4,999)	61.6	12.1	4.2	14.7	26.3	10.3
Large (5,000–24,999)	48.3	20.4	15.7	21.2	26.6	45.7
Very Large (25,000+)	48.2	21.7	9.7	18.9	20.1	28.0
<b>Urbanicity</b>						
City	45.5	18.8	16.3	28.8	36.6	26.1
Suburban	59.5	18.9	8.1	16.5	20.9	38.0
Town	60.3	16.9	7.3	19.7	31.0	9.9
Rural	62.5	21.1	5.3	14.6	36.1	12.7
<b>Poverty Level</b>						
Low (0–29 percent F/RP)	68.1	14.7	5.5	11.7	28.5	15.5
Medium (30–59 percent F/RP)	62.9	20.4	8.8	17.7	35.2	17.8
High (60 percent or more F/RP)	48.6	24.5	5.5	22.7	31.9	15.2
Wgtd <i>n</i>	5,310	4,697	4,622	4,652	4,902	1,786
Unwgtd <i>n</i> <sup>2</sup>	514	453	448	450	472	197

<sup>1</sup> The percentage of SFAs that used other non-Federal sources differed significantly by SFA size.

<sup>2</sup> *n* is less than the 862 SFAs that used non-Federal funds to offset potential increases in prices due to item nonresponse.

**Note:** “Any paid meals” includes breakfast and lunch.

**Source:** SFA Director Survey SY 2013–14, question 6.4.

### Weighted Average Price of All Paid NSLP Lunches

TABLE 8.10 shows the WAPs of all paid NSLP lunches by SFA characteristics for SY 2013–14. The average price for all SFAs was \$2.34 but prices varied significantly by urbanicity and poverty level. SFAs with low poverty levels charged higher prices than SFAs with medium and high poverty levels. Similarly, SFAs in city and suburban areas had higher weighted average prices for all paid lunches than those SFAs located in town and rural areas.

TABLE 8.10 *Weighted Average Price of All Paid NSLP Lunches, by SFA Characteristics, SY 2013–14*

SFA characteristics	Average Price
All SFAs	\$2.34
<b>SFA Size</b>	
Small (1–999)	2.34
Medium (1,000–4,999)	2.35
Large (5,000–24,999)	2.33
Very Large (25,000+)	2.32
<b>Urbanicity<sup>1</sup></b>	
City	2.43
Suburban	2.57
Town	2.30
Rural	2.23
<b>Poverty Level<sup>2</sup></b>	
Low (0–29 percent F/RP)	2.58
Medium (30–59 percent F/RP)	2.28
High (60 percent or higher F/RP)	2.27
Wgtd <i>n</i>	11,084
Unwgtd <i>n</i>	<sup>a</sup> 1,252

<sup>1</sup> The weighted average price of all paid NSLP lunches in SY 2013–14 differed significantly by urbanicity.

<sup>2</sup> The weighted average price of all paid NSLP lunches in SY 2013–14 differed significantly by poverty level.

<sup>a</sup> *n* is less than 1,598 either due to item nonresponse or due to values equal to zero being excluded.

**Note:** Average for all schools was weighted based on the number of paid breakfasts or lunches served in each grade level.

**Source:** SFA Director Survey SY 2013–14, question 6.5.

### Price Increases for Nonprogram Foods

Nonprogram foods are defined as foods sold in a participating school, other than a reimbursable meal that is purchased using funds from the school foodservice account. Under Section 206 of the HHFKA, revenues from the sale of all nonprogram foods are required to accrue only to the school foodservice account.<sup>104</sup>

À la carte items are the most readily accessible nonprogram foods and are considered competitive foods<sup>105</sup> to reimbursable meals, and therefore may compete for revenues. For instance, students may elect to purchase à la carte items rather than selecting a reimbursable meal, directly affecting the number of reimbursable meals claimed by SFAs. TABLE 8.11 shows the percentage of SFAs that increased à la carte prices from SY 2011–12 to SY 2012–13, and from SY 2012–13 to SY 2013–14. Significant differences were found to exist between SY 2012–13 and SY 2013–14.

In SY 2013–14, 29 percent of all SFAs increased à la carte prices. Significant differences were found across all SFA characteristics. Larger SFAs, those in suburban and town locales, and low poverty levels were more likely to have increased prices.

A larger proportion of SFAs (38 percent) increased à la carte prices between SY 2011–12 and SY 2012–13. Significant differences were also present in this period. As in SY 2013–14, larger SFA size, suburban and town locales, and low poverty levels were associated with à la carte price increases.

As shown in TABLE 8.12, among those SFAs that increased à la carte prices, 64 percent chose to increase prepared entrées, 63 percent increased snack prices, and 60 percent increased the price of à la carte beverages in SY 2013–14. The smallest proportion of SFAs reported increasing candy prices. Beverages, frozen desserts, and prepared entrées all received a modal increase of 25 cents. Most other à la carte items experienced a modal increase of 10 cents. As mentioned above in a previous section, the mode is the value that occurs with the greatest frequency; this measure identifies the amount by which schools most frequently increased the price of their à la carte items, which the mean or median would fail to do.

In SY 2012–13, over half of all SFAs chose to increase the prices of prepared entrées, beverages, and snacks by a mode of 25 cents (56, 56, and 54 percent, respectively). Prepared non-entrée food items experienced modal increases of 25 cents as well.

In SY 2013–14, a larger number of SFAs chose to raise prices for most à la carte items than in SY 2012–13. Fewer SFAs (a decline of 4 percent) increased milk prices; across both school years, milk received the lowest modal increase (5 cents) among all other items.

The percentage of SFAs that chose to increase snack prices differed significantly between SY 2012–13 and SY 2013–14 (54 and 63 percent, respectively). Improving the nutrition of students is one of the

<sup>104</sup> 7 CFR § 210.14 (f) required all revenue from the sale of nonprogram foods to accrue to the nonprofit school foodservice account, but allowed for the sale of nonprogram foods in the foodservice area if the revenue from these sales accrued to the benefit of the nonprofit school foodservice account or school or a student organization approved by the school. See <http://www.gpo.gov/fdsys/pkg/CFR-2013-title7-vol4/pdf/CFR-2013-title7-vol4-sec210-14.pdf>.

<sup>105</sup> “Competitive food” is defined as all food (other than reimbursable meals) sold to students during the school day.

stated goals of the HHFKA. The data suggest that SFAs are adopting price increases on nonprogram food items such as snacks and à la carte items, which may encourage students to choose healthier alternatives.

TABLE 8.11 *Percentage of SFAs That Increased À La Carte Prices Between SY 2012–13 and SY 2013–14, by SFA Characteristics*

SFA Characteristics	SY 2012–13			SY 2013–14		
	Percentage of SFAs That Increased À La Carte Prices	Total SFAs		Percentage of SFAs That Increased À La Carte Prices	Total SFAs	
		Wgtd <i>n</i>	Unwgt'd <i>n</i>		Wgtd <i>n</i>	Unwgt'd <i>n</i>
All SFAs	38.1	14,439	<sup>a</sup> 1,446	28.6	14,226	<sup>b</sup> 1,519
<b>SFA Size</b> <sup>1</sup>						
Small (1–999)	21.2	7,276	349	17.1	7,251	351
Medium (1,000–4,999)	56.7	5,124	540	40.6	5,117	586
Large (5,000–24,999)	52.5	1,730	380	41.1	1,574	394
Very Large (25,000+)	45.8	309	177	35.5	285	188
<b>Urbanicity</b> <sup>1</sup>						
City	23.5	1,804	274	22.1	1,276	255
Suburban	48.3	2,728	382	36.4	2,635	415
Town	45.3	2,749	272	37.3	2,538	276
Rural	35.1	7,158	518	26.7	6,804	517
<b>Poverty Level</b> <sup>1</sup>						
Low (0–29 percent F/RP)	52.6	2,903	308	40.2	2,939	342
Medium (30–59 percent F/RP)	42.2	6,705	657	33.8	6,587	696
High (60 percent or more F/RP)	23.7	4,832	481	14.0	4,700	481

<sup>1</sup> Percentage of SFAs that increased à la carte prices differed significantly by SFA size, urbanicity, and poverty level in SY 2012–13 and SY 2013–14.

<sup>a</sup> *n* is less than 1,491 due to item nonresponse.

<sup>b</sup> *n* is less than 1,598 due to item nonresponse.

**Note:** The percentage of SFAs that increased à la carte prices differed significantly between SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2012–13, question 6.15; SFA Director Survey SY 2013–14, question 6.6.

TABLE 8.12 *Among SFAs That Increased À La Carte Prices, the Percentage of SFAs That Increased Prices and the Modal Increase of Those Prices, by À La Carte Foods, SY 2012–13 and SY 2013–14*

À la Carte Items	SY 2012–13		SY 2013–14 <sup>1</sup>	
	Among SFAs that Increased À La Carte Prices, the Percentage of SFAs that Increased Item Prices	Modal Price Increase <sup>1</sup>	Among SFAs that Increased À La Carte Prices, the Percentage of SFAs that Increased Item Prices	Modal Price Increase <sup>1</sup>
Beverages	55.5	\$.25	59.9	\$.25
Milk	31.2	.05	27.6	.05
Frozen Desserts	35.6	.25	39.0	.25
Baked Goods – Dessert	39.5	.10	45.4	.10
Bread/Grain Products	33.6	.10	37.3	.10
Snacks	53.9	.25	<sup>a</sup> 62.8	.10
Candy	3.3	.25	5.5	.10
Prepared Entrées	56.2	.25	63.5	.25
Prepared Non-Entrée Food	30.3	.25	32.4	.10
Reimbursable Meal Options	N/A	N/A	33.0	.10
Wgtd <i>n</i>	5,371		3,788	
Unwgted <i>n</i>	<sup>b</sup> 643		<sup>c</sup> 491	

<sup>1</sup> Analysis is restricted to SFAs that increased prices for each item.

<sup>a</sup> Among SFAs that increased à la carte prices, the percentage of SFAs that increased prices for snacks differed significantly between SY 2012–13 and SY 2013–14.

<sup>b</sup> *n* is less than the 657 SFAs that increased à la carte prices due to item nonresponse in SY 2012–13.

<sup>c</sup> *n* is less than the 521 SFAs that increased à la carte prices due to item nonresponse in SY 2013–14.

**Source:** SFA Director Survey SY 2012–13, question 6.16; SFA Director Survey SY 2013–14, questions 6.6, and 6.6a.

## 8.2 SFA Revenues and Costs

### 8.2.1 Background

Several regulations regarding school meals—including the HHFKA, PLE, and updated meal pattern requirements—are likely to influence the costs/revenues and financial health of SFAs. There are likely to be increased revenues from increases in paid lunch prices and from the additional 6 cents per lunch reimbursement provided to SFAs that are in compliance with the updated meal pattern requirements. At the same time, updated HHFKA measures calling for updated nutrition standards for school meals and snacks may require additional financial outlays. States or local governments may provide additional funding to SFAs to assist their implementation if they are in a financial position to do so.

In this section, revenue, cost, and break-even status over time are examined to illuminate the net effect of these policy changes. Since the updated meal pattern requirements went into effect in SY 2012–13, it is one of the objectives of the SN-OPS, SY 2013–14 study to gauge the full impact of the requirements on

revenues and expenditures, as well as whether the increased reimbursement is sufficient to cover the costs of implementing the updated nutritional standards. The analysis conducted in this section provides a picture of the overall financial health of SFAs after the full implementation of the updated meal pattern requirements.

### 8.2.2 Research Questions

The research questions in this section focus on SFA expenditures and revenues for SY 2010–11, SY 2011–12, and SY 2012–13.

- What was the total dollar amount of foodservice program revenues for SY 2012–13?
- What was the total dollar amount of foodservice expenditures for SY 2012–13?
- What were the median daily expenditures per average daily attendance (ADA) in SY 2010–11, SY 2011–12, and SY 2012–13? How did these vary by SFA characteristics?
- What were the annual revenues of SFAs as a percentage of their annual expenditures in SY 2010–11, SY 2011–12, and SY 2012–13?
- What were the two-year revenues of SFAs as a percentage of their two-year expenditures in SY 2010–11 and SY 2011–12, and in SY 2011–12 and SY 2012–13?

### 8.2.3 Results

In this section, due to a high degree of dispersion for some variables, the median was used in addition to the mean to measure the central tendency for revenues and expenditures, as it is less sensitive to outliers. The median is the 50th percentile of distribution, with 50 percent of probability having values above this amount and 50 percent of probability having values below this amount.

To account for the very large differences in SFA size, this study used total annual daily expenditures (and revenues) per average daily attendance (ADA) to examine expenditures and revenues. This measure was calculated by dividing the annual expenditure and revenue measures by 180 days (the typical number of school days per year)<sup>106</sup> to get an approximation of an SFA's daily expenditures and revenues. This daily expenditure (revenue) measure was then divided by ADA to get expenditure (revenue) per ADA, which captures the expenditure (revenue) per student in attendance per day.

#### *Expenditures and Revenues*

Many factors affect an SFA's expenditure and revenue, including the inflation rate, any cost implications of meeting nutrition standards, the amount of reimbursement SFAs received, and the number and reimbursement status of students participating in the school meals programs during SY 2012–13.

TABLE 8.13 presents the medians of revenues and costs reported by SFAs during SY 2012–13. The median gives an accurate measure of central tendency when the data have a few very large or very small values, as is the case with the reported expenditures and revenues of SFAs. Additionally, a break-even analysis was conducted identifying areas of discrepancy, further promoting the analysis with a median

<sup>106</sup> The National Center for Education Statistics reports that the average number of operating days for school district is 180.

measurement. The median revenue for all SFAs in SY 2012–13 was \$444,393, while the average cost was \$460,793. On average, SFAs appeared to have a deficit of funds for SY 2012–13. The large discrepancy between revenues and costs indicates both varying definitions of these concepts used by SFAs and, likely, some data entry errors by the respondents. Therefore, it is more informative to analyze break-even (the ratio of revenues to expenditures), as presented in TABLE 8.14.

TABLE 8.13 *Revenues/Expenditures Received/Made by SFAs during SY 2012–13, by SFA Characteristics*

SFA Characteristics	Median Revenues	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>	Median Expenditures	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>
All SFAs	\$444,393	11,225	1,250	\$ 460,793	11,156	1,242
<b>SFA Size</b>						
Small (1–999)	\$177,252	5,581	271	\$192,917	5,546	269
Medium (1,000–4,999)	\$857,601	4,002	460	\$873,198	3,982	458
Large (5,000–24,999)	\$3,637,345	1,380	346	\$3,558,186	1,366	342
Very Large (25,000+)	\$17,615,758	262	173	\$17,757,744	262	173
<b>Urbanicity</b>						
City	\$2,025,657	1,086	227	\$2,183,800	1,027	222
Suburban	\$1,170,887	2,059	346	\$1,238,500	2,052	344
Town	\$777,737	2,078	229	\$768,393	2,095	229
Rural	\$280,848	5,369	411	\$300,000	5,354	411
<b>Poverty Level</b>						
Low (0–29 percent F/RP)	\$554,038	2,257	272	\$600,103	2,219	270
Medium (30–59 percent F/RP)	\$429,243	5,276	577	\$447,833	5,310	575
High (60 percent or more F/RP)	\$336,041	3,692	401	\$370,196	3,627	397

<sup>1</sup> *n* is less than 1,598 due to item nonresponse.

Source: SFA Director Survey SY 2013–14, question 7.2.

To be consistent with the previous two years of SN-OPS, a break-even category with a ratio of  $1.0 \pm 0.05$ <sup>107</sup> was defined to discuss SFAs that broke even to those that did not. As seen in TABLE 8.14, in SY 2011–12, 45 percent of SFAs broke even, and in SY 2012–13, 43 percent of SFAs broke even. In SY 2010–11, approximately 41 percent of SFAs broke even. Moreover, the median ratio of total revenues to total expenditure was equal to 1.0 in each year, meaning that 50 percent of SFAs reported above 1.0 and 50 percent reported below.

<sup>107</sup> The break-even ratio of  $1.0 \pm 0.05$  indicates an SFA is considered break-even if the ratio of revenues to expenses is equal to 1.0, in which revenues would equal expenses, or between .95 and 1.05, indicating the revenues were within five percentage points lower (96–100 percent) than the total expenses or revenues were within five percentage points higher (101–105 percent) than total expenses.

TABLE 8.14 *Distribution of SFAs by Annual Revenues as a Percentage of Annual Expenditures, SY 2010–11, SY 2011–12, and SY 2012–13*

Annual Revenues as a Percentage of Annual Expenditures	SY 2010–11	SY 2011–12	SY 2012–13
≤85percent	19.0	14.1	15.9
86 to 90 percent	5.4	6.4	5.0
91 to 95 percent	9.6	12.0	13.5
96 to 100 percent	23.6	25.2	24.2
101 to 105 percent	17.8	20.4	19.2
106 to 110 percent	12.2	9.7	10.0
111 to 115 percent	4.0	5.4	3.2
≥116 percent	8.4	6.7	9.2
<b>Total</b>	100.0	100.0	100.0
Median Ratio (revenues/expenditures)	1.00	1.00	1.00
Wgtd <i>n</i>	10,680	9,399	11,043
Unwgted <i>n</i>	<sup>a</sup> 1,082	<sup>b</sup> 997	<sup>c</sup> 1,236

<sup>a</sup> *n* is less than 1,401 because of missing data on revenues and/or expenditures.

<sup>b</sup> *n* is less than 1,491 because of missing data on revenues and/or expenditures.

<sup>c</sup> *n* is less than 1,598 because of missing data on revenues and/or expenditures.

**Note:** Distribution of revenues as a percentage of expenditures was significantly different between SY 2010–11 and SY 2011–12, but not statistically significant between SY 2011–12 and SY 2012–13.

**Source:** SFA Director Survey SY 2011–12, questions 6.1a and 7.1a; SFA Director Survey SY 2012–13, questions 7.1.1 and 8.1.1; SFA Director Survey SY 2012–13, questions 7.1 and 7.2.

TABLE 8.15 presents the ratio of two-year revenues as a percentage of two-year costs, which gives a dynamic picture of SFAs' operating status over time. The break-even status may be more properly viewed over time rather than within each single year; the results in TABLE 8.15 give a more accurate picture of SFAs' financial health over time compared to the results from a cross-section of SFAs in any given year. The measurement of break-even status over two years was obtained by dividing SFAs' total revenue over two years by SFAs' total expenditure for this period. According to the definition of break-even noted on the previous page, 45 percent (20 percent and 25 percent) of SFAs were operating at the break-even status in SY 2010–11 and SY 2011–12; that figure for SY 2011–12 to SY 2012–13 was 48 percent (26 percent and 22 percent). In SY 2010–11 and SY 2011–12, 22 percent of SFAs had revenue-to-expenditure ratios below 96 percent; this increased to 30 percent in SY 2012–13.

In general, the most notable changes in distributions of SFAs by two-year revenues as a percentage of two-year expenditures were observed in the 91 to 95 percent strata. Only one percent of SFAs operated at this revenue to expenditure level across SY 2010–11 and SY 2011–12, whereas 12 percent of SFAs operated at this level during SY 2011–12 and SY 2012–13. It appears the increase in the percentage of SFAs operating with revenue-expenditures at the 91 to 95 percent level in SY 2011–12 and SY 2012–13 coordinates with the decrease observed in the percentage of SFAs operating at less than 85 percent, between 96 and 100 percent, and between 101 to 105 percent in SY 2010–11 and SY 2011–12. However, the percentage of SFAs that operated at or above the break-even status (a ratio of two-year revenue to two-year expenditure greater than or equal to 1.16) remained steady at approximately 6 percent across all three school years (SY 2010–11 to SY 2012–13).

TABLE 8.15 *Distribution of SFAs by Two-Year Revenues as a Percentage of Two-Year Expenditures, SY 2010–11, SY 2011–12, and SY 2012–13*

Two-Year Revenues as a Percentage of Two-Year Expenditures	SY 2010–11 and SY 2011–12	SY 2011–12 and SY 2012–13
≤85 percent	16.3	12.3
86 to 90 percent	4.9	6.3
91 to 95 percent	1.0	11.8
96 to 100 percent	20.0	25.5
101 to 105 percent	24.7	21.9
106 to 110 percent	12.9	11.4
111 to 115 percent	5.4	4.6
≥116 percent	5.8	6.3
<b>Total</b>	100.0	100.0
Median Ratio (revenues/expenditures)	1.00	1.00
Wgtd <i>n</i>	7,483	7,980
Unwgted <i>n</i>	<sup>a</sup> 683	<sup>b</sup> 791

<sup>a</sup> *n* is less than the 1,177 SFAs that participated in both SN-OPS, SY 2011–12 and SN-OPS, SY 2012–13 because of missing data on revenues and/or expenditures.

<sup>b</sup> *n* is less than the 1,350 SFAs that participated in both SN-OPS, SY 2012–13 and SN-OPS, SY 2013–14 because of missing data on revenues and/or expenditures.

**Source:** SFA Director Survey SY 2011–12, questions 6.1a and 7.1a; SFA Director Survey SY 2012–13, questions 7.1.1 and 8.1.1; SFA Director Survey SY 2013–14, questions 7.1 and 7.2.

### Cash Expenditure

Many factors, such as the rate of inflation or the cost change in meeting the updated nutrition standards for school meals and snacks, can affect SFAs' total expenditures.

As shown in TABLE 8.16, there were significant changes in the distribution of SFAs by cash expenditure per ADA between SY 2010–11 and SY 2011–12, and between SY 2011–12 and SY 2012–13. Over the three years, there has been a distinct decline in the percentage of SFAs with expenditures of \$2.50 or less per ADA, and an overall growth in the percentage with expenditures over \$3.00 per ADA (from 39 percent in SY 2010–11 to 42 percent in SY 2012–13). Between each school year, however, the percentage of SFAs reporting expenditures of more than \$3.51 per ADA fluctuated. In SY 2012–13, 29 percent of SFAs spent more than \$3.51 per ADA, while only 27 percent and 25 percent of SFAs spent more than \$3.51 per ADA in SY 2010–11 and SY 2011–12, respectively. The percentage of SFAs spending more than \$3.51 per ADA increased 4 percent between SY 2011–12 and SY 2012–13, which exceeded the increase in inflation for that period.<sup>108</sup>

<sup>108</sup> The increasing rates for inflation (CPI-U) from 2010 to 2013 are 3.16 percent, 2.07 percent, and 1.46 percent, respectively. Source: USDOL, BLS. N.D. "Consumer Price Index." Accessed January 29, 2016. <http://www.bls.gov/cpi/home.htm>.

TABLE 8.16 *Distribution of SFAs by Daily Food Service Expenditures per Average Daily Attendance (ADA), SY 2010–11, SY 2011–12, and SY 2012–13*

Expenditures per ADA <sup>1</sup>	SY 2010–11	SY 2011–12	SY 2012–13
≤1.50	5.7	6.1	9.4
\$1.51–\$2.00	14.5	12.5	8.8
\$2.01–\$2.50	20.8	17.8	1.9
\$2.51–\$3.00	20.1	25.8	20.5
\$3.01–\$3.50	11.6	13.1	13.9
≥\$3.51	27.3	24.7	28.5
<b>Total</b>	100.0	100.0	100.0
Wgtd <i>n</i>	11,005	9,626	10,1810
Unwgted <i>n</i>	<sup>a</sup> 1,114	<sup>b</sup> 1,021	<sup>c</sup> 1,114

<sup>1</sup> The distribution of SFA daily cash expenditures per ADA differed significantly between SY 2010–11 and SY 2011–12, and between SY 2011–12 and SY 2012–13.

<sup>a</sup> *n* is less than 1,401 because of missing expenditures.

<sup>b</sup> *n* is less than 1,491 because of missing expenditures.

<sup>c</sup> *n* is less than 1,598 because of missing expenditures.

**Source:** SFA Director Survey SY 2011–12, question 7.1a; SFA Director Survey SY 2012–13, question 8.1.1; SFA Director Survey SY 2013–14, question 7.2.

TABLE 8.17 examines SFAs' daily foodservice expenditures per ADA by SFA characteristics over three years. SBP participation, SFA size, urbanicity, poverty level, and the use of FSMCs are the major characteristics for which expenditures per ADA were tabulated. The median expenditure per ADA for all SFAs was \$2.84 in SY 2012–13, which was significantly different from \$2.74 in SY 2011–12 and \$2.68 in SY 2010–11. SFAs' median expenditures per ADA varied significantly by SBP participation status, SFA size, urbanicity, poverty level, and use of FSMC in all three years.

To assist in operating the school-based CN programs, SFAs may contract with an FSMC to manage foodservice operations. When using an FSMC, SFAs need to consider the relationship between expenditures and revenues incurred through self-operation of the programs, the availability of qualified staff to administer the programs, and so on. As shown in TABLE 8.17, SFAs that contract with FSMCs spent less than SFAs that did not contract with FSMCs across all three school years, suggesting that FSMCs may operate school nutrition programs more efficiently than SFAs who self-operate.

The median daily expenditure per ADA in SY 2010–11 was higher in SFAs participating in both the NSLP and the SBP (\$2.74) and lower in those participating only in the NSLP (\$1.89). The gap increased in SY 2011–12 to \$2.85 for SFAs participating in both programs and \$1.80 for those participating in the NSLP only, but declined in SY 2012–13, when the median expenditures of SFAs participating only in the NSLP increased by 28 cents to \$2.08, while the median costs for SFAs participating in both programs rose by 3 cents to \$2.88. The additional expenditures associated with participating in the SBP as well as the NSLP thus increased from \$.85 in SY 2010–11 to \$1.05 in SY 2011–12, but fell back to \$.80 in SY 2012–13.

Median daily expenditure per ADA was inversely related to SFA size, from \$3.00 in small SFAs to \$2.35 in very large SFAs in SY 2010–11, but the differential in SY 2011–12 (\$2.96 to \$2.46) was narrower. The gap

closed further in SY 2012–13, with the median expenditures of small SFAs (\$3.00) exceeding those of large SFAs (\$2.67) by \$.33.

Median daily expenditures per ADA increased as the poverty level of the SFA increased. Median expenditures increased from \$2.12 in low-poverty SFAs, to \$2.67 in medium-poverty SFAs and \$3.30 in high-poverty SFAs in SY 2010–11. The corresponding median expenditures in SY 2011–12 were \$2.05, \$2.66, and \$3.26, and \$2.20, \$2.76, and \$3.32 in SY 2012–13. The gap between median daily expenditures per ADA for low and high poverty levels was slightly narrower in SY 2012–13 (\$1.12) than in SY 2010–11 (\$1.18).

Suburban SFAs had the lowest median daily expenditures per ADA in all three years, with median expenditures of \$2.09 in SY 2010–11, \$2.25 in SY 2011–12, and \$2.28 in SY 2012–13. Median expenditures otherwise decreased with urbanicity from \$2.94 in rural SFAs to \$2.79 in town SFAs and \$2.43 in city SFAs in SY 2010–11. This trend continued in SY 2011–12, with median expenditures of \$2.96 in rural SFAs, \$2.67 in town SFAs, and \$2.61 in city SFAs. In SY 2012–13, however, there were little to no differences in the median daily expenditures per ADA among rural (\$2.91), town (\$2.82), and city (\$2.82) SFAs.

TABLE 8.17 SFAs' Daily Food Service Expenditures Per ADA by SFA Characteristics, SY 2010–11, SY 2011–12, and SY 2012–13

SFA Characteristics	SY 2010–11			SY 2011–12			SY 2012–13		
	Median Daily Expenditure Per ADA	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>1</sup>	Median Daily Expenditure Per ADA	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>2</sup>	Median Daily Expenditure Per ADA	Wgtd <i>n</i>	Unwgted <i>n</i> <sup>3</sup>
All SFAs	\$2.68	11,004	1,114	<sup>a</sup> \$2.74	9,626	1,021	<sup>a</sup> \$2.84	10,181	1,114
<b>Participation in SBP<sup>4</sup></b>									
NSLP and SBP	2.74	10,092	1,059	2.85	8,874	970	2.88	7,784	841
NSLP only	1.89	913	55	1.80	753	51	2.08	607	39
<b>SFA Size<sup>5</sup></b>									
Small (1–999)	3.00	5,288	241	2.96	4,744	226	3.00	5,142	248
Medium (1,000–4,999)	2.54	4,096	411	2.62	3,317	354	2.67	3,620	417
Large (5,000–24,999)	2.53	1,361	308	2.53	1,297	286	2.60	1,190	298
Very Large (25,000+)	2.35	260	154	2.46	268	155	2.67	229	151
<b>Urbanicity<sup>6</sup></b>									
City	2.43	1,131	218	2.61	1,278	208	2.82	860	188
Suburban	2.09	1,974	293	2.25	1,747	268	2.28	1,885	311
Town	2.79	2,273	215	2.67	1,745	185	2.82	1,949	211
Rural	2.94	5,627	388	2.96	4,857	360	2.91	4,859	368
<b>Poverty Level<sup>7</sup></b>									
Low (0–29 percent F/RP)	2.12	2,501	269	2.05	1,800	204	2.20	1,962	232
Medium (30–59 percent F/RP)	2.67	5,233	519	2.66	4,530	269	2.76	4,938	524
High (60 percent or higher F/RP)	3.30	3,270	326	3.26	3,296	348	3.32	3,281	358
<b>Use of an FSMC<sup>8</sup></b>									
SFA uses an FSMC	2.43	2,023	202	2.44	1,923	185	2.55	1,885	209
SFA does not use an FSMC	2.78	8,923	908	2.86	7,663	833	2.90	7,539	824

<sup>1</sup> *n* is less than 1,401 because of missing expenditures.

<sup>2</sup> *n* is less than 1,491 because of missing expenditures.

<sup>3</sup> *n* is less than 1,598 because of missing expenditures.

<sup>4</sup> Median expenditures per ADA significantly differed by participation in SBP in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>5</sup> Median expenditures per ADA significantly differed by SFA size in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>6</sup> Median expenditures per ADA significantly differed by urbanicity in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>7</sup> Median expenditures per ADA significantly differed by poverty level in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>8</sup> Median expenditures per ADA significantly differed by use of FSMC in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>a</sup> Differences in medians between SY 2010–11 and SY 2011–12 and between SY 2011–12 and SY 2012–13 are statistically significant.

**Source:** SFA Director Survey SY 2011–12, question 7.1a; SFA Director Survey SY 2012–13, question 8.1.1; SFA Director Survey SY 2013–14, question 7.2; State data on SBP meals claimed.

Total revenues that SFAs receive include Federal reimbursement, State and local subsidies, student payments for school meals, and non-reimbursable sales. According to the PLE provision, schools may increase prices for paid meals in order to meet the requirement that the prices for paid meals are no less than the difference between free meal reimbursement and paid meal reimbursement. Also, since SY 2012–13, SFAs are provided with additional 6 cent per lunch reimbursement if they are in compliance with the updated meal pattern requirements. These two policy provisions are major impetuses for change in revenue generation among SFAs nationally.

TABLE 8.18 shows the distribution of SFAs by their daily revenue per ADA over three years. There was a shift toward more revenue per ADA in the distribution. Twenty-five percent of SFAs had the ability to generate more than \$3.51 per ADA in SY 2012–13, while only 22 percent of SFAs in SY 2010–11 and 21 percent of SFAs in SY 2011–12 had revenues of more than \$3.51.

TABLE 8.18 *Distribution of SFAs by Daily Food Service Revenue Per ADA, SY 2010–11, SY 2011–12, and SY 2012–13*

Revenues per ADA	SY 2010–11 (percent)	SY 2011–12 (percent)	SY 2012–13 (percent)
≤1.50	8.2	6.3	11.3
\$1.51–\$2.00	14.7	10.8	8.6
\$2.01–\$2.50	22.8	21.2	20.8
\$2.51–\$3.00	20.9	24.5	20.6
\$3.01–\$3.50	11.6	15.9	14.0
≥\$3.51	21.9	21.2	24.7
<b>Total</b>	100.0	100.0	100.0
Wgtd <i>n</i>	10,982	9,778	10,215
Unwgted <i>n</i>	<sup>a</sup> 1,106	<sup>b</sup> 1,031	<sup>c</sup> 1,118

<sup>a</sup> *n* is less than 1,401 because of missing revenues.

<sup>b</sup> *n* is less than 1,491 because of missing revenues.

<sup>c</sup> *n* is less than 1,598 because of missing revenues.

**Notes:** The distribution of daily revenues per ADA differed significantly between SY 2010–11 and SY 2011–12. The distribution of daily revenues per ADA differed significantly between SY 2011–12 and SY 2012–13.

**Source:** SFA Director Survey SY 2011–12, question 6.1a; SFA Director Survey SY 2012–13, question 7.1.1; SFA Director Survey SY 2013–14, question 7.2.

TABLE 8.19 examines SFAs' foodservice revenue per ADA by SFA characteristics over three years. As with expenditures, SBP participation, SFA size, urbanicity, poverty level, and the use of FSMCs are the major measurements for revenues per ADA. Overall, the median revenue per ADA for all SFAs was \$2.84 in SY 2012–13, which was significantly different from \$2.77 in SY 2011–12 and \$2.59 in SY 2010–11.

SFAs in towns or rural areas generated more revenues per ADA compared to city and suburban areas during SY 2010–11 and SY 2011–12. However, SFAs with city urbanicity generated the highest revenues per ADA in SY 2012–13. SFAs with high poverty levels had the highest revenues across all three years.

SFAs that used FSMCs to manage foodservice operations generated less revenue per ADA as compared to SFAs that did not use FSMCs. In SY 2012–13, the median daily revenue per ADA for SFAs using an FSMC was \$2.49, while the revenue for SFAs that did not use an FSMC was \$2.82.

TABLE 8.19 SFAs' Daily Food Service Revenue Per ADA, by SFA Characteristics, SY 2010–11, SY 2011–12, and SY 2012–13

SFA Characteristics	SY 2010–11			SY 2011–12			SY 2012–13		
	Median Daily Revenue Per ADA	Wgtd <i>n</i>	Unwgted <i>n</i>	Median Daily Revenue Per ADA	Wgtd <i>n</i>	Unwgted <i>n</i>	Median Daily Revenue Per ADA	Wgtd <i>n</i>	Unwgted <i>n</i>
All SFAs	\$2.59	10,982	<sup>b</sup> 1,106	<sup>a</sup> \$2.77	9,778	<sup>c</sup> 1,031	<sup>a</sup> \$2.84	10,182	<sup>d</sup> 1,117
<b>Participation in SBP<sup>1</sup></b>									
NSLP and SBP	2.64	10,005	1,049	<sup>a</sup> 2.82	9,016	980	2.84	7,841	846
NSLP only	1.80	978	57	1.77	762	51	1.99	633	40
<b>SFA Size<sup>2</sup></b>									
Small (1–999)	2.68	5,317	242	2.85	4,860	231	2.86	5,167	250
Medium (1,000–4,999)	2.51	4,081	408	2.63	3,365	360	2.60	3,629	418
Large (5,000–24,999)	2.47	1,323	300	<sup>a</sup> 2.56	1,284	284	2.68	1,198	300
Very Large (25,000+)	2.45	262	156	<sup>a</sup> 2.57	269	156	2.75	229	151
<b>Urbanicity<sup>3</sup></b>									
City	2.46	1,199	221	2.64	1,320	212	2.86	916	192
Suburban	2.09	1,961	289	<sup>a</sup> 2.24	1,750	267	2.26	1,889	312
Town	2.77	2,265	214	2.68	1,756	187	2.83	1,921	210
Rural	2.70	5,557	382	2.86	4,952	365	2.84	4,864	368
<b>Poverty Level<sup>4</sup></b>									
Low (0–29 percent F/RP)	2.07	2,487	266	2.02	1,826	206	2.15	1,999	234
Medium (30–59 percent F/RP)	2.61	5,182	516	2.68	4,522	467	2.67	4,894	525
High (60 percent or higher F/RP)	3.03	3,313	324	3.25	3,431	358	3.21	3,331	360
<b>Use of an FSMC<sup>5</sup></b>									
SFA uses a FMSC	2.26	2,100	206	2.44	1,910	186	2.49	1,947	213
SFA does not use a FMSC	2.66	8,820	895	<sup>a</sup> 2.81	7,820	842	2.82	7,545	826

<sup>1</sup> Median revenues per ADA differed significantly by participation in the SBP in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>2</sup> Median revenues per ADA differed significantly by SFA size in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>3</sup> Median revenues per ADA differed significantly by urbanicity in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>4</sup> Median revenues per ADA differed significantly by poverty level in SY 2010–11, SY 2011–12, but did not differ significantly in SY 2012–13.

<sup>5</sup> Median revenues per ADA differed significantly by use of an FSMC in SY 2010–11, SY 2011–12, and SY 2012–13.

<sup>a</sup> Differences between SY 2010–11 and SY 2011–12 and between SY 2011–12 and SY 2012–13 were significant.

<sup>b</sup> *n* is less than 1,401 because of missing revenues.

<sup>c</sup> *n* is less than 1,491 because of missing revenues.

<sup>d</sup> *n* is less than 1,598 because of missing revenues.

**Source:** SFA Director Survey SY 2011–12, question 7.1a; SFA Director Survey SY 2012–13, question 8.1.1; SFA Director Survey SY 2-13-14, question 7.1.

### *Operation as a Nonprofit*

One of the objectives of this section is to examine the net effect of policy changes on the overall financial health of SFAs. As mentioned earlier, operating at the break-even level is defined as a ratio of revenues to expenditures equal to  $1.0 \pm 0.05$ .

As stated in the footnotes of TABLE 8.20, there were no significant changes in the percentage of SFAs operating at or above the break-even level across three years for all SFAs. As mentioned in previous tables, there have been, however, significant changes in SFA expenditures and revenues. Additionally, between SY 2011–12 and SY 2012–13, significant differences were not found in the overall percentage of SFAs operating at or above the break-even level across SFA characteristics.

As presented in the table, the percentage of SFAs operating at or above the break-even level varied significantly by SFA size for all three years. In SY 2012–13, 88 percent of large and 85 percent of very large SFAs operated above or below the break-even level, compared to 56 percent of small SFAs and 69 percent of medium SFAs; a similar pattern can be observed in SY 2010–11 and SY 2011–12. Additionally, the number of SFAs that operated above or below the break-even level significantly differed between SY 2010–11 and SY 2011–12. In SY 2011–12, 89 percent of very large SFAs operated at or above the break-even level, while only 59 percent of small SFAs operated at or above the break-even level. In both SY 2010–11 and SY 2011–12, SFAs with medium poverty levels were more likely to break even (70 percent in both years) than all SFAs (66 percent in 2010–11 and 68 percent in 2011–12), and high-poverty SFAs (58 percent and 62 percent, respectively) remained less likely to do so.

TABLE 8.20 *Percentage of SFAs Operating At or Above the Break-Even Level by SFA Characteristics, SY 2010–11, SY 2011–12, and SY 2012–13*

<b>SFA Characteristics</b>	<b>SY 2010–11 (percent)</b>	<b>SY 2011–12 (percent)</b>	<b>SY 2012–13 (percent)</b>
All SFAs	65.9	67.5	65.7
<b>SFA Size<sup>1</sup></b>			
Small (1–999)	58.1	58.8	56.4
Medium (1,000–4,999)	70.0	73.2	69.2
Large (5,000+)	79.8	80.5	88.3
Very Large (25,000+)	90.4	88.7	85.2
<b>Use of an FSMC</b>			
SFA Uses an FMSC	65.9	68.9	71.4
SFA Does Not Use an FMSC	66.0	67.1	64.6
<b>Poverty Level</b>			
Low (0–29 percent F/RP)	67.2	69.7	64.8
Medium (30–59 percent F/RP)	70.3	70.4	64.6
High (60 percent or higher F/RP)	57.9	62.3	67.7

<sup>1</sup>The percentage of SFAs operating at or above the break-even level differed significantly by SFA size in SY 2010–11, SY 2011–12, and SY 2012–13.

**Note:** Operating at or above the break-even level is defined as a ratio of revenues to expenditures of greater than .95. There was no significant difference in the percentage of SFAs operating at or above the break-even level between SY 2010–11, SY 2011–12 and SY 2012–13.

**Source:** SFA Director Survey SY 2011–12, questions 6.1a and 7.1a; SFA Director Survey SY 2012–13, questions 7.1.1 and 8.1.1; SFA Director Survey SY 2012–13, questions 7.1 and 7.2.

## 9 State Policies and Finances: Administration of the NSLP and the SBP

### 9.1 Administrative Review Process

#### 9.1.1 Overview of Administrative Review (AR) Process

Amendments to the Richard B. Russell National School Lunch Act introduced by HHFKA require the implementation of a unified accountability system. Every three years, SAs must conduct an Administrative Review (AR) to evaluate the school meals program operations of participating SFAs.<sup>109</sup> Local Wellness Policies are evaluated in both Critical and General Areas of review, including the implementation of the HHFKA program requirements and other Federal programs.

The AR process began optional implementation in SY 2013–14 and has been updated to replace the Coordinated Review Effort and School Meals Initiative Review. FNS incorporated input from the School Meals Administrative Review Reinvention Team (SMARRT), a 26-member team of FNS, Regional Office, and SA staff, and began the rulemaking process to establish a unified monitoring process that included key aspects of the Coordinated Review Effort and School Meals Initiative Review.<sup>110</sup> The SY 2013–14 CN State Director Survey collected data to assess the implementation of the updated AR process for the NSLP and the SBP.

FNS planned for gradual implementation of the AR. Effective July 1, 2013, the option to replace the Coordinated Review Effort and School Meals Initiative with the updated AR was provided.<sup>111</sup> The Coordinated Review Effort previously examined overall program administration on a five-year cycle, and the School Meals Initiative Review determined whether school meals meet nutrition standards by focusing on the assessment of the nutrient content of menus and related issues. Adoption and implementation of AR continued to be optional in SY 2013–14, and remains optional until a final rule is passed, as SAs transition from the original review processes (the Coordinated Review Effort and School Meals Initiative Review) in preparation for updated regulations. SAs were allowed to adopt the updated AR process in its entirety or to continue operating with the prior review processes, with a majority of SAs adopting the updated AR process in SY 2013–14. Information on how SAs perceive the transition to the AR is of great importance to the program’s successful integration and implementation in school systems, especially since all SAs will use the AR process once a final rule is issued.

The updated AR process simplifies the monitoring procedures, offers more flexibility in many areas (e.g., it includes both an off-site and on-site review component), and includes a risk-based approach in several

---

<sup>109</sup> USDA, FNS. (2015). “Team Nutrition Local School Wellness Policy: Administrative Review Process.” Published January 1. <http://www.fns.usda.gov/tn/local-school-wellness-policy-administrative-review-process>.

<sup>110</sup> USDA, FNS. 2015. “80 FR 26846: Administrative Reviews in the School Nutrition Programs.” *Federal Register*. Published May 11. <http://www.federalregister.com/Browse/Document/usa/na/fr/2015/5/11/2015-10613>.

<sup>111</sup> USDA, FNS. N.D. “Coordinated Review Effort Procedures Manual.” Accessed January 29, 2016. <http://www.fns.usda.gov/sites/default/files/cn/SP04-2015a.pdf>.

of the review modules to identify potential violations. In addition, the updated approach allows for more targeted collaborative technical assistance.

The AR has three major parts: (1) Performance Standard 1, which includes a review of certification, benefit issuance, meal counting, and claiming; (2) Performance Standard 2, which includes a review of food components and quantities, and the dietary specifications; and (3) General Areas of Review, which is an assessment of general performance areas, which include resource management, food safety, local school wellness policy(ies), competitive food standards, and various other program areas covered in Federal law and regulations.<sup>112</sup> The AR process allows the SA to assess program compliance, provide technical assistance to local operators and secure any needed corrective action, identify improperly paid funds, and assess fiscal action when appropriate. FNS has provided training and technical assistance to SAs on how to implement each step in the process.

FNS provides the standard forms, instructions, and guidance for SAs to conduct ARs. The Administrative Review Manual (the Manual) contains eleven sections with materials for SAs to use in review of the NSLP, SBP, and other Federal school nutrition programs.<sup>113</sup> The Manual consists of AR Tools and Forms, with modules that cover a number of review categories including the Nutrient Analysis and Validation Tool, Dietary Specifications Assessment Tool, Resource Management Risk Indicator Tool, Eligibility Certification and Benefit Issuance Error Worksheets, Fiscal Action Workbooks, and the Off- and On-site Assessment Tools, among others.<sup>114</sup> FNS updated the Manual for SY 2014–15, making changes to several Tools, Forms, and Instructions<sup>115</sup>, in addition to providing a new section, *Smart Snacks in School*, to ensure that SAs identify the entities responsible for selling foods and beverages to students and that these items meet minimum requirements established in 7 CFR 210.11.<sup>116</sup>

If errors are observed in the AR's Critical or General Areas of Review, a Corrective Action Plan (CAP) is required. The CAP includes a list of the required areas of improvement and correction, a time frame for completing corrections and improvements, and documentation that will need to be provided by SFAs to SAs to confirm completion of the CAP. Fiscal action is also taken in applicable instances.

---

<sup>112</sup> USDA, FNS. 2013. "Administrative Review Manual: For monitoring of program requirements under the National School Lunch Program, School Breakfast Program, and other Federal school nutrition programs." Accessed January 29, 2016. <http://www.fns.usda.gov/sites/default/files/ARguidancemanual.pdf>.

<sup>113</sup> USDA, FNS. 2013. "School Meals Administrative Review-Revised Manual, Tools, and Forms." Published September 20. <http://www.fns.usda.gov/sites/default/files/ARcover.pdf>.

<sup>114</sup> The AR consists of over thirty modules.

<sup>115</sup> Changes were made to the *On-site Assessment Tool*, *Dietary Specifications Assessment Tool*, *Resource Management (RM) Tools*, *Eligibility Certification and Benefit Issuance Error Worksheet (now SFA-1)*, *Other Eligibility Certification Issuance Errors Worksheet (SFA-3)*, *School Data and Meal Pattern Error Form (S-1)*, *Fiscal Action Workbook*, and *Seamless Summer Option School Data and Meal Pattern Error Form (SSO S-1)*.

<sup>116</sup> USDA, FNS. 2014 "SP 61-2014: Administrative Review-Revised Manual, Tools and Forms." Published September 3. <http://www.fns.usda.gov/sites/default/files/cn/SP61-2014os.pdf>.

### 9.1.2 Review Procedures and Considerations

A number of components are included in the AR review modules, as noted above. The research questions addressed in this section (see 9.1.3, below) focus on the process and outcomes of Menu Reviews, Resource Management Reviews, and Special Provision Option determination; hence, the findings focus on these particular areas of the updated AR. These areas relate most closely to the Menu Review components included in the Nutritional Quality and Meal Pattern and the Resource Management subcomponents of the AR. To provide context for the research questions, a brief overview of these sections (and associated review instruments and procedures) is presented in the following paragraphs.

#### *Menu Review Options*

Review of dietary specifications and completion of nutrient analysis (as applicable) are included in the AR process to assess whether meals served to children through the school meal programs are consistent with Federal standards for calories, saturated fat, sodium, and *trans* fat. SAs must complete the Meal Compliance Risk Assessment Tool for each reviewed school; SAs generally obtain current information for the tool from SFAs. The site with the highest score is considered most at risk for noncompliance with the required meal pattern, and must receive a targeted menu review, which may include a nutrient analysis. An SA may choose from four options (Option 1–Option 4) when conducting targeted menu reviews.<sup>117</sup> Whichever option is selected, the SA must conduct that option in its entirety to officially complete a targeted menu compliance review.

#### *Option 1*

In Option 1, the SA reviews menu documentation from the review period to examine the school's compliance with the NSLP and SBP dietary specifications using the USDA-specified tools. For schools that are determined as high-risk for noncompliance, the SA must conduct a nutrient analysis. The SA has discretion to conduct a nutrient analysis for low-risk schools.

#### *Option 2*

Option 2 allows the SA to validate an existing nutrient analysis conducted by the SFA (or contractor), using USDA-approved nutrient analysis software, for the school selected for a targeted menu review. Nutrient analysis is conducted on each menu.

#### *Option 3*

In Option 3, the SA conducts a nutrient analysis using USDA-approved nutrient analysis software to review a week of school breakfasts and lunches. The menu being analyzed should be the week corresponding to the AR.

---

<sup>117</sup> Option 4 was not included in the CN Director Survey conducted for SY 2013–14, since only one State (Kentucky) was eligible to apply for the option.

### Option 4

Option 4 allows the SA to use an alternate method to assess compliance with dietary specifications by using the USDA-approved “Menu Planning Tools for Certification for Six Cent Reimbursement.” This method requires a review of food purchases, menu planning, meal preparation, and meal service, as well as nutrition analyses. Submitted Option 4 alternatives must be approved by USDA.

### Resource Management Comprehensive Review

A comprehensive review in the Resource Management (RM) areas assesses a school’s financial management records from the most recently completed fiscal year, program year, or State closed and audited year. The SA must complete a comprehensive review for each SFA that was found to have three or more risk indicators in the Resource Management Risk Indicator Tool used to assess the level of risk for problems in resource management. SAs review the following items during a comprehensive review: maintenance of the nonprofit school foodservice account, paid lunch equity, revenue from nonprogram foods, and indirect costs, as well as identifying any high-risk practices.<sup>118</sup> The Resource Management Risk Indicator Tool was designed to help identify areas of risk for non-compliance and areas where technical assistance may be needed. The use of a risk indicator tool balances the need to target high-risk areas against constrained resources.

### Special Provision Options (SPO)<sup>119</sup>

To reduce administrative challenges, LEAs and SFAs with a high percentage of F/RP meal certifications may elect to use the Special Provision Options (SPO). As seen in Section 4, SFAs and LEAs seeking to use the SPO may elect one of the following review meal claiming procedures: Provision 1, Provision 2, Provision 3, or CEP.<sup>120</sup> The Administrative Review contains a section titled Special Provision Options which ensures compliance in these areas.

### 9.1.3 Research Questions

The research questions associated with State Policies and Finances: Administration of the NSLP and the SBP include:

<sup>118</sup> FNS issued updates to the Administrative Review Manual, Tools, Forms and Instructions for SY 2014–15, removing questions pertaining to USDA Foods from the Off-site Assessment and Resource Management Risk Indicator Tools; USDA, FNS. 2014. “SP 61-2014: Administrative Review-Revised Manual, Tools and Forms.” Published September 3. <http://www.fns.usda.gov/sites/default/files/cn/SP61-2014os.pdf>.

<sup>119</sup> Also referred to as Special Assistance Alternatives. See Section 4.

<sup>120</sup> Provision 1 allows schools in which 80 percent or more of enrolled students are eligible for F/RP meals to use approved free applications for two consecutive school years, reducing the certification burden from annually to once every two years. Provision 2 allows schools to serve meals to all participating children at no charge for a period of four years with reimbursement rates determined based on eligibility determinations in a base year and annual meal counts. Provision 3 is similar to Provision 2, except that reimbursements are determined by the base year reimbursements and adjustments for inflation. CEP provides an alternative to paper applications for certification in high-poverty SFAs and schools. Reimbursements are based on a formula, which depends on the number of students identified as eligible through direct certification.

- How many SAs completed (by March 31, 2014) menu reviews using Option 1, 2, 3, or the Menu Planning Tool for Certification for Six Cent Reimbursement? Of those using Option 1 or Option 3, how many had nutrient analyses conducted by SA staff? How many of the reviews conducted under Option 2 were successfully validated?
- How many SFAs in the State received a Resource Management Comprehensive Review? Of these, how many were conducted due to failure to complete the Resource Management Risk indicator at least four weeks prior to the on-site review?
- How many abbreviated SPO reviews were conducted (when a school was not selected for an SPO review in a non-base year)?
- Among schools selected for Administrative Review and operating an Afterschool Snack Program (ASP), how many on-site reviews were conducted?
- How many dollars did SAs assess in the Fiscal Actions (FA) designed to recover overpayments? How many overclaims were disregarded using the \$600 disregard of overclaim provision?
- How many SFAs in the State appealed findings from the updated Administrative Review process? How many of these had findings resulting in Fiscal Actions?
- In how many States did findings based on the SA’s Meal Access and Reimbursement Performance Standard 1 increase or decrease under the updated Administrative Review process?
- How many SFA reviews of students’ certification and benefit issuance documentation were conducted through a census of all free and reduced-price-eligible students? A sampling method at the 95 percent confidence level? The 99 percent confidence level?
- How do SAs rate the updated Administrative Review process? What is the most important recommendation they would make to FNS on the updated Administrative Review process?

#### 9.1.4 Results

All 55 SAs invited to complete the survey responded, so the data are consequently considered a census. Item nonresponse seldom exceeded one or two cases per question.

##### *Usage and Distribution of AR Options*

TABLE 9.1 below shows a summary of the use of the AR in SY 2013–14 and represents the Menu Reviews (Option 1–Option 3), and Resource Management Comprehensive Reviews, SPOs, and on-site ARs for the snack program that took place in SY 2013–14. SAs have access to multiple tools created by FNS to determine eligibility and certifications for meal programs. Off-site assessment tools are used to verify F/RP meal compliance, renewal applications, claims of reimbursement, and findings from prior years. On-site tools examine F/RP certification, accurate meal counts, claims of reimbursement, and general areas. SAs should already have selected individual sites on the day of the on-site review.

Once site selection has been completed, the SA must complete the Meal Compliance Risk Assessment Tool for each site selected for review.

State agency staff conducted only 241, or 7 percent, of the nutrient analyses involved in the 3,399 SFA menu reviews conducted under Option 1. As previously mentioned, only schools that are deemed high-risk are required to conduct a nutrient analysis, while low-risk schools maintain the option.

Option 2 permits verification of a nutrient analysis conducted by an SFA or its contractor. In SY 2013–14, menu reviews were conducted for 173 SFAs under Option 2. Of these, the nutrient analyses were successfully validated for 156 SFAs, for a 90 percent successful validation rate.

Menu reviews were conducted under Option 3 for 575 SFAs. State agency staff had conducted the nutrient analyses for 517, or 90 percent, of these menu reviews by June 1, 2014.

SAs had completed 307 Abbreviated SPO reviews of SFAs by June 1, 2014, and planned another 11. These represented 14 percent of the menu reviews conducted. Of the 1,467 schools selected for Administrative Review and operating an Afterschool Snack Program, 1,082 on-site reviews were conducted as of June 1, 2014 (or 74 percent), and 30 reviews were planned for the rest of the year.

TABLE 9.1 shows that most SAs (82 percent) utilized Option 1 to complete the Targeted Menu Review, with 44 percent of these SAs conducting a nutrient analysis. In comparison, fewer SAs used Option 3 than Option 1 (55 percent) but a higher percentage (55 percent) of SFAs that opted to use Option 3 conducted a nutrient analysis. Fewer SAs used Option 2 (40 percent), with 42 percent successfully validating an existing nutrient analysis.

The comprehensive review in the Resource Management section was widely used by SAs (80 percent), while 44 percent of SFAs were identified as needing a comprehensive review due to having a high number of risk factors found with the Resource Management Risk Indicator tool. These two observations indicate that more than half of SFAs that received a comprehensive review in the Resource Management section did so because 3 or more potential risk areas were identified on the Resource Management Risk Indicator Tool.

More than half (55 percent) of SAs used the Abbreviated SPO review in at least one AR. A SPO-Abbreviated review is conducted when site selection procedures select an SPO site during a non-base year. If violations are identified from the abbreviated review, the SFA will be required to participate in a Corrective Action Plan to improve the identified deficiencies and submit documentation for each site utilizing the SPO being reviewed. When severe non-compliance is identified during an abbreviated review, SAs are strongly encouraged to conduct a full on-site Administrative Review of non-compliant sites.

An abbreviated SPO review is also employed in conjunction with a general AR when an SFA is comprised of a combination of school sites operating one or more SPO (i.e., Provision 2, Provision 3, and/or CEP) and one or more standard meal counting and claiming sites. During site selection, an SFA comprised of both standard and SPO sites will be required to select a standard site and one of each type of SPO site. The AR will be conducted for the standard meal counting and claiming site and an Abbreviated SPO review will be used at SPO sites.

TABLE 9.1 *State Agency CN Directors' Use of the Updated Administrative Review Process Among the 47 States That Adopted the Updated Administrative Review Process, SY 2013–14*

Type of Review	Percentage of State Agencies <sup>1</sup>	Number of SFAs Receiving Review <sup>2</sup>
Targeted Menu Review – Option 1	81.8	3,399
Targeted Menu Review – Option 2	40.0	173
Targeted Menu Review – Option 3	54.5	575
Nutrient Analyses by State Agency Staff – Option 1	43.6	241
Nutrient Analyses by State Agency Staff – Option 3	54.5	517
Nutrient Analysis Successfully Validated by State Agency Staff – Option 2	41.8	156
Resource Management Comprehensive Review	80.0	828
Resource Management Comprehensive Review Conducted due to Failure of Resource Management Risk Indicator Tool	43.6	107
Abbreviated Special Provision Option	54.5	318
On-Site Reviews of Afterschool Snack Program	89.1	1,112

<sup>1</sup> Percentages add to more than 100 percent because SAs may employ more than one type of review.

<sup>2</sup> Based on the number of reviews completed and anticipated by all 47 SAs during SY 2013–14.

**Note:** Option 1 allows the use of the dietary specifications assessment tool, Option 2 allows validation of an existing nutrient analysis performed by the SFA or contractor, and Option 3 employs SA staff for the nutrient analysis. The Resource Management Comprehensive Review focuses on ensuring SFAs are maintaining and using nonprofit school foodservice accounts in accordance with regulatory requirements and ensuring that related costs are necessary, reasonable, and allowable.

**Source:** CN Director Survey SY 2013–14, questions A2, A3, A4, A5, A6, and A7.

As shown in TABLE 9.2, almost one-third (32 percent) of SAs used Option 1 only for targeted menu reviews; another 15 percent used both Options 1 and 2, and 11 percent used all three options. Only two percent used Option 2 alone to conduct targeted menu reviews, and 13 percent used Option 3 alone. One SA used both Options 1 and 3 (two percent), and another used both Options 2 and 3 (two percent).

Option 1 was the preferred review method among the 47 SAs that adopted the updated AR. When SAs used a combination of menu review options, Options 1 and 2 were the most prevalent. Option 1 may have had higher usage due to the ease of targeted menu review approach, which requires the SA to conduct a nutrient analysis only if deemed high-risk for noncompliance as compared to Option 3, which requires a nutrient analysis, and Option 2, which requires that the SA validate an existing nutrient analysis (TABLE 9.2). In Option 1, an on-site review is required regardless of whether the SFA is determined high-risk or low-risk, and while on-site, if the SA determines that the low-risk status cannot be validated, the SA is to perform a nutrient analysis.

TABLE 9.2 *Distribution of Targeted Menu Review Options Among the 47 State Agencies That Adopted the Updated Administrative Review Process, SY 2013–14*

Using Various Options	Percentage of State Agencies
Option 1 only	31.9
Option 2 only	2.1
Option 3 only	12.8
Options 1 and 2	14.9
Options 1 and 3	2.1
Options 2 and 3	2.1
Options 1, 2, and 3	10.6

**Note:** Of the 47 State agencies that adopted the updated administrative review process for SY 2013–14.

**Source:** CN Director Survey SY 2013–14, questions A2, A3, and A4.

The AR process includes a Fiscal Action Formula module that reviews certification and benefit issuance documentation for F/RP meals. SAs must select students receiving F/RP meals for review and may elect to either review *all* F/RP price students on the point of service benefit issuance documents for schools in the SFA, or select a statistically valid *sample* of all F/RP students on the point of service benefit issuance document for all schools in the SFA.<sup>121</sup>

For the statistically valid *sample* option, SAs must establish a sample at a 99 percent confidence level if the SFA uses a certification and benefit issuance system that is either manual, a combination of manual and electronic, or if the SA has identified potential areas of systemic errors of noncompliance based on the SFA's responses to the Off-site Assessment Tool. SAs that solely use an electronic system and that have not identified any potential areas of systemic errors have the option of selecting a sample based on either a 99 or 95 percent confidence level.

Of the 4,318 SFAs receiving this type of review (TABLE 9.3), nearly two-thirds (65 percent, or 2,714) used or planned to use a sampling methodology designed to achieve a 99 percent confidence level. Just over one-quarter (26 percent) used or will use a complete census, and only 9 percent used or will use a 95 percent confidence interval. The overwhelming prevalence of the 99 percent confidence interval or a complete census (91 percent) indicates that most SFAs are not using an entirely electronic certification and benefit issuance system.

<sup>121</sup> USDA, FNS. 2013. "Administrative Review Manual: For monitoring of program requirements under the National School Lunch Program, School Breakfast Program, and other Federal school nutrition programs." Accessed January 29, 2016. <http://www.fns.usda.gov/sites/default/files/ARguidancemanual.pdf>.

TABLE 9.3 *Number of SFA Reviews Performed by State Agency Certifying Free and Reduced-Price Students, by Sampling Strategy, SY 2013–14*

<b>Sampling Strategy</b>	<b>Number of SFA Reviews<sup>1</sup></b>
All Free and Reduced-Price Students	1,080
Sampling to Achieve a 95 Percent Confidence Level <sup>2</sup>	369
Sampling to Achieve a 99 Percent Confidence Level <sup>3</sup>	2,714
<b>Total</b>	<b>4,163</b>

<sup>1</sup> Reviews conducted under the updated Administrative Review process.

<sup>2</sup> A confidence level refers to the percentage of all possible samples that can be expected to include the true population parameter. A 95 percent confidence level means that 95 percent of the samples will fall in the confidence interval.

<sup>3</sup> A 99 percent confidence level means that 99 percent of the samples will fall in the confidence interval.

**Note:** Based on the responses of the 47 States that adopted the updated Administrative Review process for SY 2013–14.

**Source:** CN Director Survey, SY 2013–14, question A16.

### *State Response to Updated Federal Administrative Review Processes*

State agency directors were asked questions regarding the AR and how the updated review process differed from the former process (i.e., Coordinated Review Effort and School Meals Initiative Reviews). TABLE 9.4 presents SAs' opinions on the time required to complete the updated AR and menu reviews. Improved accuracy was a major goal of the AR, so SAs were requested to indicate whether or not accuracy in the implementation of certain programs improved as result of the updated AR.

SAs report that the updated AR is much more (70 percent) or somewhat more (17 percent) time-consuming than the previous process, and that the Meal Pattern and Nutritional Quality assessment of menus is also much more (47 percent) or somewhat more (23 percent) time-consuming.

Although completion times have increased, three-quarters (75 percent) of SAs feel that the Resource Management process is much more or somewhat more accurate than the previous Coordinated Review Effort and School Meal Initiative. Thirty-six percent of SAs consider the Meal Pattern and Nutritional Quality review somewhat more accurate, however, a substantial percentage of SAs (38 percent) believe this review has about the same accuracy. Many SAs also indicated that the General Program Compliance (55 percent) and Other Federal Program reviews (43 percent), respectively, have "about the same" accuracy as previous review processes.

Based on the responses, the percentage who feel that Meal Pattern and Nutritional Quality (49 percent) and Other Federal Program Reviews (51 percent) are much more or somewhat more accurate is comparable to the percentages who felt that the accuracy has not improved in these areas or that it is about the same (38 and 43 percent, respectively).

Overall, larger percentages of SAs reported no improved accuracy compared to those that see "much more" or "somewhat more" improved accuracy in Administrative Review processes. The only exception to this is Resource Management, where more SAs see "much more" (47 percent) or "somewhat more" (28 percent) accuracy than SAs who do not (17 percent and 6 percent). While the Resource Management review was not included in the CRE, SAs were asked to assess the accuracy of the inclusion of the Resource Management in the updated AR process compared to the previous process.

TABLE 9.4 *State Agency CN Directors' Evaluation of the Updated Administrative Review Process Compared to Previous Processes, SY 2013–14*

Process	Percentage of State Agencies				
	Much More	Somewhat More	About the Same	Somewhat Less	Much Less
Time to Complete a Review	70.2	17.0	8.5	2.1	0.0
Time to Complete the Review of the Meal Pattern and Nutritional Quality of Menus	46.8	23.4	8.5	19.2	0.0
Accuracy in the Following Review Areas:					
Meal Access and Reimbursement	10.6	19.2	55.3	8.5	4.3
Meal Pattern and Nutritional Quality	12.8	36.2	38.3	10.6	0.0
Resource Management	46.8	27.7	17.0	0.0	6.4
General Program Compliance	8.5	23.4	55.3	6.4	4.3
Other Federal Program Reviews	27.7	23.4	42.6	2.1	2.1

**Note:** Based on the responses of the 47 States that adopted the updated administrative review process for SY 2013–14.

**Source:** CN Director Survey, SY 2013–14, question A17.

SAs were able to provide free-form recommendations in the SY 2013–14 survey to assist USDA in improving the updated AR process, as shown in TABLE 9.5. Thirty of the responses suggested a need for clearer, streamlined, and linked or consolidated forms, with greater guidance and technical assistance. Another 11 responses stated that the updated AR process was burdensome and called for streamlining and consolidation of the AR process. Three similar responses continued in this direction, calling for greater discretion or more limited conditions for what needs to be reviewed. Another three responses expressed specific preferences for prior forms and requirements. Three SAs called for further training in the updated methods.

TABLE 9.5 *Recommendations on How to Change or Improve the Updated AR Process*

Recommendation	Number
Simplify, Streamline Forms	30
Simplify the Review Process	11
Allow More Discretion and/or Relax Conditions for What Must be Reviewed	3
Return to Previous Forms or Requirements Under the CRE	3
Provide Greater Training	3

**Source:** CN Director Survey, SY 2013–14, question A18.

## 9.2 State Data Systems

### 9.2.1 Overview of State Data Systems Survey

A new section was included in the SN-OPS for SY 2013–14 to address several major research questions that would enable FNS to review the current status of States' data systems, and the capacities of these

systems for receiving and processing information from schools, SFAs, and other entities reporting to the SA. The Data Systems portion of the questionnaire also addressed the capacity of the SA to forward required information to FNS through their data systems.

### 9.2.2 Research Questions

- How many SAs have standardized computer-based reporting systems that are used by some or all SFAs to send data on school meal programs to the SA? What services are provided by these systems, and what functions are available? In what year was each system first implemented?
- How are these systems linked to SFAs, schools, or other sites (e.g., online, Web-based, encrypted vs. unencrypted email)?
- Who developed the systems (e.g., a vendor, CN IT staff, other State IT staff)? What was the primary funding source?
- How satisfied are SAs with their systems?
- Does the system allow the SA to upload required data to USDA's Food Programs Reporting System (FPRS)? If so, how satisfied are SAs with the link to FPRS?

The objective of these research questions is to provide an overview of the current data system capabilities of SAs, to identify where improvements or updates are needed, and where computer processes or systems have proven successful with SAs, SFAs, and schools.

The first research question is focused on providing a snapshot of how far State CN Agencies have moved toward implementing data systems that enable at least some of a State's SFAs to report required data on school meal programs to their SAs. These data can provide a measure of State CN Agency progress towards partially or fully automated systems. The data also provide a national distribution of fully automated, partially automated, and non-automated systems among State CN Agencies, which will help FNS identify regions that are less advanced than others in building or maintaining computerized reporting systems.

The results will also determine when States began implementing their current computerized reporting systems, identify early implementers, and identify when data system automation implementation became widespread.

The second research question examines the services and functions that are most commonly supported by computerized reporting systems. Ranking such services based on frequency could prove beneficial in identifying the most advantageous computer-based functions for schools, and the services and functions that have the greatest cost benefit to SAs. These data might contribute to developing strong business cases for investing in automated systems where they are absent. The rank order of responses might also help identify sets of services and functions that are most likely to be included in or added to a system's capabilities beyond the core set of services and functions. Identifying SFAs' computer services and function could allow FNS to construct a typology that might distinguish systems that provide some core services and functions from those that provide all core services and functions, as well as highlight sets of additional services and functions.

The third research question focuses on computer-based reporting systems built by private vendors, contractors, in-house SA staff, or a combination of the three. This information may provide a basis for future research on the capabilities and features offered by those systems, and the importance of those

capabilities and features for effective use of, and satisfaction with, such systems. Listing major vending and contracting firms that provide computer reporting systems will help identify options for SAs that do not yet have computer-based reporting systems or systems with advanced capabilities.

Funding for some SFAs' computer-based reporting systems came from Federal grants and State Administrative Expense (SAE) or operating funds. Verifying the number and percentage of systems funded and/or maintained using Federal grants for improving data systems could prove useful in identifying factors associated with high-quality systems. Future analyses, such as cross-tabulations or correlations, could examine sources for funding and maintaining systems with the likelihood that the system reaches all instead of some of its SFAs, or if such funding offers a wider range of services and functions. This analysis might be valuable for better understanding of the options (funding, maintenance, functions, etc.) that proved most effective for SAs that have implemented computer-based reporting systems, and how such factors vary with the characteristics and composition of each SA's clientele and SFA structure. Pinpointing effective options in providing computer-based reporting systems can have positive implications for SAs that currently have less advanced systems.

Satisfaction with computer-based reporting systems is presented in the fourth research question. Survey respondents were required to respond to satisfaction questions based on a Likert-type rating scale of "very satisfied," "satisfied," "unsatisfied," and "very unsatisfied." Such information will be helpful in identifying how satisfaction levels are related to computer-based reporting system ability levels, computer functions and services, sources of funding, in-house computer services, and vendor and contractor services.

The final research question asks whether or not SAs can upload required data to USDA's Food Program Reporting System (FPRS) with their current computer-based reporting systems. While the prior research questions focused on the flow of data from SFAs, this question identifies how many SAs with computerized reporting systems can forward report data to FNS. This finding can facilitate discussions on expanding the number of SAs with such capability, identifying computer-based reporting systems currently used by SAs that are compatible with FPRS, and understanding why certain computer-based reporting systems are or are not compatible with FPRS.

### 9.2.3 Results

The following tables include survey data collected regarding the five questions discussed above. An overview of when SAs implemented standardized computer-based reporting systems, linked computer programs, the use of SA programs, site (school) ability to transfer school information to SAs, funding sources, and overall satisfaction of computer systems are discussed below.

Of the 55 SAs surveyed, only 11 percent did not have a standardized, computer-based reporting system by SY 2013–14. More than one quarter of SAs had systems whose implementation dated to between 2005 and 2009 (27 percent), and more than forty percent of SAs implemented their systems prior to 2005 (TABLE 9.6).

TABLE 9.6 *Year That State Agencies Implemented a Standardized, Computer-Based Reporting System, SY 2013–14*

Year of Implementation	Percentage of State Agencies (n=55)
2004 or Earlier	40.0
2005 to 2009	27.3
2010 to 2012	10.9
2013 or 2014	10.9
Missing <sup>1</sup>	10.9

<sup>1</sup> Six SAs did not have a standardized, computer-based reporting system.

Source: CN Director Survey SY 2013–14, question D4.

Forty-eight (98 percent) of the 49 SAs with standardized, computer-based reporting systems had their Afterschool Snack Programs linked to the system, and 47 (96 percent) had their Special Milk Programs linked. Seamless Summer Option, Summer Food Service programs, and Child and Adult Care Food Programs were linked in 42 (86 percent), 41 (84 percent), and 34 (69 percent) of the SAs, respectively. Food Distribution Programs were linked in 24 (49 percent) of the 49 SAs, while the Fresh Fruit and Vegetable programs were linked in 30 percent (15) of the SAs. Several other programs were linked to a standardized, computer-based reporting system in only one SA (TABLE 9.7).

TABLE 9.7 *Percentage of State Agencies with CN Programs Linked to Their Standardized, Computer-Based Reporting System, by Program, SY 2013–14*

Program	Percentage of State Agencies (n=49) <sup>1</sup>
Afterschool Snack Program	98.0
Special Milk Program	95.9
Seamless Summer Option	85.7
Summer Food Service Program	83.7
Child and Adult Care Food Program	69.4
Food Distribution	49.0
Others	44.9
Fresh Fruit and Vegetable Program	30.6

<sup>1</sup> n is less than 55 because six SAs did not have a standardized, computer-based reporting system, and one State did not respond to this item.

Note: CN Directors could select more than one program, so the percentages do not add up to 100 percent.

Source: CN Director Survey SY 2013–14, question D2.

Of the 49 SAs with standardized, computer-based reporting systems, 43 (90 percent) used them to generate USDA reports and 41 (86 percent) used them for meal claiming. Other widespread functions performed included verification activities in 37 SAs (78 percent), running monitoring reports or queries in 34 SAs (71 percent), financial services in 29 SAs (61 percent), and for food safety records or training in 27 SAs (57 percent).

About one-third of the SAs used their standardized, computer-based reporting systems for meal counting (18, or 37 percent), managing FSMCs or cooperative purchasing agreements (17, or 35 percent), and wellness policy reporting (16, or 33 percent). Eight SAs (16 percent) used their systems for meal planning and for other functions, including some related to 6 cent certification, tracking training and reports, USDA ordering, average meal price reporting, approval of equipment purchases, guidance memos, a Complex Event Processing tool and application,<sup>122</sup> and the FFVP (Fresh Fruit and Vegetable Program).

The primary computer-based reporting system functions that SAs had access to included program renewal, meal claiming, generating USDA reports, verification activities, and direct certification matching or reporting (TABLE 9.8).

TABLE 9.8 *Percentage of State Agencies' Standardized, Computer-Based Reporting Systems That Perform Various Functions, by Function, SY 2013–14*

Function	Percentage of State Agencies (n=49) <sup>1</sup>
Program Renewal	93.9
Generating USDA Reports	89.8
Meal Claiming	85.7
Verification Activities	77.6
Direct Certification Matching or Reporting	75.5
Running Monitoring Reports or Queries	71.4
Financial Services	61.2
Applications Processing	59.2
Food Safety Records or Training	57.1
Administrative Reviews	42.9
Certification Processing	40.8
Meal Counting	36.7
Managing FSMCs or Cooperative Purchasing Agreements	34.7
Wellness Policy Reporting	32.7
Meal Planning	16.3
Others	16.3

<sup>1</sup> n is less than 55 because six SAs did not have a standardized, computer-based reporting system.

**Note:** CN Directors could select more than one function, so the percentages do not add up to 100 percent.

**Source:** CN Director Survey SY 2013–14, question D3.

Almost all (94 percent, or 45) of the 49 SAs in TABLE 9.9 with standardized, computer-based reporting systems stored site-level (SFAs and/or schools) information on claiming. Site-level information on

<sup>122</sup> One State reported using a Complex Event Processing tool and application system. "Complex Event Processing" applications are used to aggregate information gathered in independent, "simple" events and identify patterns and correlations to infer more "complex" relationships between data. See [http://www.sapient.com/content/dam/sapient/sapientglobalmarkets/pdf/thought-leadership/CEP\\_POV\\_whitepaper.pdf](http://www.sapient.com/content/dam/sapient/sapientglobalmarkets/pdf/thought-leadership/CEP_POV_whitepaper.pdf).

certification status was maintained by 23 SAs (47 percent), and basis-of-eligibility data by 14 (29 percent); 6 retained other data, such as site-level applications.

TABLE 9.9 *Percentage of State Agencies With Site-Level Information Contained in Their Standardized, Computer-Based Reporting Systems, by Type of Information, SY 2013–14*

Information	Percentage of State Agencies ( $n=49$ ) <sup>1</sup>
Certification Status	46.9
Claiming	93.9
Basis of Eligibility	28.6
Others	
Site-Level Applications	11.1
Program Applications	7.4
Data Collection	3.7

<sup>1</sup>  $n$  is less than 55 because six SAs did not have a standardized, computer-based reporting system.

**Note:** CN Directors could select more than one type of information, so the percentages do not add up to 100 percent.

**Source:** CN Director Survey SY 2013–14, question D5.

As shown in TABLE 9.10, of the 49 SAs that had standardized, computer-based reporting systems in SY 2013–14, 41 (86 percent) linked their SFAs, and 24 (51 percent) linked their schools to the system through a Web-based site where data could be uploaded through an Internet interface or a file transfer protocol (FTP) site. Nearly half of the SAs (24, or 49 percent) used automatic online uploading or sharing of files to link their SFAs to the system, and 14 (29 percent) linked their schools through this method. Eight SAs (16 percent) linked SFAs to their systems through data sent through encrypted email, and five (10 percent) used unencrypted email; three SAs (6 percent) linked their schools through encrypted email, and four (8 percent) used unencrypted email. In 21 SAs (43 percent), data from SFAs had to be manually rekeyed into the system; the corresponding number for schools was 12 (25 percent).

TABLE 9.10 *Percentage of State Agencies That Link Their Standardized, Computer-Based Reporting Systems to SFAs and Schools, by Type of Method Used for Linking, SY 2013–14*

Methods	Percentage of State Agencies ( <i>n</i> =49) <sup>1</sup>	
	SFAs	Schools
Online (Automatic Uploading or Sharing of Files)	49.0	28.6
Web-Based Site (Data Uploaded Through a Web Interface or FTP Site)	85.7	51.0
Data Sent Through Encrypted Email	16.3	6.1
Data Sent Through Unencrypted Email	10.2	8.2
Manual Re-Keying of Data into System	42.9	24.5

<sup>1</sup> *n* is less than 55 because six SAs did not have a standardized, computer-based reporting system.

**Note:** CN Directors could select more than one method, so the percentages of SFAs and schools do not add up to 100 percent.

**Source:** CN Director Survey SY 2013–14, question D6.

SAs were more than twice as likely to use vendors to develop their systems (82 percent) than to use State staff (35 percent), including State CN IT staff (20 percent), State non-CN IT staff (10 percent), and other non-IT staff (4 percent). SAs were, however, more than twice as likely to use State staff (98 percent), rather than vendors (43 percent) to manage their systems. State CN IT staff were used to maintain systems in 24 SAs (51 percent), while 16 (33 percent) used State IT staff from agencies other than CN and seven (14 percent) used other non-IT staff (TABLE 9.11).

Colyar Consulting Group developed or managed the systems for 20 of the SAs, and Dynamic Internet Solutions did so for eight. Hupp and Cybersoft Technologies each developed or managed the systems used by two States; no other vendor developed or managed a system for more than one State (see Appendix TABLE D.23 for a list of these vendors).

TABLE 9.11 *Percentage of State Agencies That Reported the Ways That They Developed and Managed Their Standardized, Computer-Based Reporting Systems, by Type of Staff, SY 2013–14*

Staff	Percentage of State Agencies ( <i>n</i> =49) <sup>1</sup>	
	Developed System	Managed System
Vendor or Contractor	81.6	42.9
State CN Agency IT Staff	20.4	51.0
State IT Staff From Agencies Other Than CN	10.2	32.7
Other, Non-IT State Staff	4.1	14.3

<sup>1</sup> *n* is less than 55 because six SAs did not have a standardized, computer-based reporting system.

**Note:** CN Directors could select more than one type of staff, so the percentages do not add up to 100 percent.

**Source:** CN Director Survey SY 2013–14, question D7.

State Administrative Expense funds were the source that most SAs used to fund the development (38 SAs, 78 percent) and maintenance (43 SAs, 88 percent) of standardized, computer-based reporting systems. Federal grants were also used by 17 SAs (35 percent) to develop systems, but only three SAs (6

percent) used such Federal funding to maintain them. State CN operating funds and other State funds were used to develop systems in two SAs (4 percent), and to maintain them in four (8 percent). Three SAs (6 percent) used other sources (two reallocated funds, and one used HHFKA funds) to develop systems (TABLE 9.12).

TABLE 9.12 *Percentage of State Agencies That Reported Funding Sources Used to Develop and Maintain Their Standardized, Computer-Based Reporting Systems, by Funding Source, SY 2013–14*

Funding Source	Percentage of State Agencies ( <i>n</i> =49) <sup>1</sup>	
	Develop System	Maintain System
Federal Grant	34.7	6.1
Other Grant	2.0	0.0
State Administrative Expense Funds	77.6	87.8
State CN Operating Funds	4.1	8.2
Other State Funds	4.1	8.2
No Funds Required	0.0	0.0
Other	6.1	
HHFKA	2.0	0.0
Reallocation of Funds	4.1	0.0

<sup>1</sup> *n* is less than 55 because six SAs did not have a standardized, computer-based reporting system.

**Note:** CN Directors could select more than one funding source, so the percentages do not add up to 100 percent.

**Source:** CN Director Survey SY 2013–14, question D8.

TABLE 9.13 shows that two-thirds (67 percent) of the 49 SAs that had standardized, computer-based reporting systems in SY 2013–14 were satisfied with their systems, and another 10 SAs (20 percent) were very satisfied. Only six SAs (12 percent) reported that they were unsatisfied, and none were very unsatisfied.

Among the 22 SAs that had links with USDA’s FPRS in SY 2013–14, 19—an overwhelming 86 percent—were satisfied, and another 5 percent were very satisfied. Only two States (9 percent) were unsatisfied, and none were very unsatisfied.

Satisfaction with their standardized, computer-based reporting systems was thus widespread among SAs, and dissatisfaction was far less common.

TABLE 9.13 *State Agency CN Director’s Satisfaction With State’s Standardized, Computer-Based Reporting System and With the Computer-Based Link With USDA’s FPRS, SY 2013–14*

	Percentage of State Agencies
SA’s Standardized Computer-Based Reporting System	(n=49) <sup>1</sup>
Very Satisfied	20.4
Satisfied	67.4
Unsatisfied	12.2
Very Unsatisfied	0.0
Computer-Based link with USDA’s FPRS	(n=22) <sup>2</sup>
Very Satisfied	4.6
Satisfied	86.4
Unsatisfied	9.1
Very Unsatisfied	0.0

<sup>1</sup> n is less than 55 because six SAs did not have a standardized, computer-based reporting system.

<sup>2</sup> 22 SAs indicated the ability to link with USDA’s FPRS.

**Source:** CN Director Survey SY 2013–14, questions D9, D10, and D10a.

TABLE 9.14 analyzes how FPRS data are generated via sites, SFAs, or SAs. Of the 48 SAs that provided information for the table below, 35 (73 percent) had SFAs send site (school) data to the SA to aggregate, while in 13 SAs (27 percent) the SFAs aggregated the site (school) data and sent them to the SA (TABLE 9.14). In six SAs (13 percent), sites (schools) sent data directly to the SA for aggregation. Other methods, used by four SAs (8 percent), involved manual entry of the data by the SA at some point in the process (two SAs), submission by the SFA (one SA), and aggregation by the SA (one SA).

TABLE 9.14 *Methods Used to Generate FPRS Reports, SY 2013–14*

Methods	Percentage of State Agencies (n=48) <sup>1</sup>
Sites (Schools) Send Data and State Agency Aggregates Them	12.5
SFAs Aggregate Site Data and Send Them to State Agency	27.1
SFAs Send Site Data and State Agency Aggregates It	72.9
Other	8.3

<sup>1</sup> n is less than 55 because six SAs did not have a standardized, computer-based reporting system, and one SA did not respond.  
**Source:** CN Director Survey SY 2013–14, question D11.

## 9.3 Budget Issues

### 9.3.1 Background

#### *Federal Financial Assistance*

FNS provides cash reimbursement to each SA for each meal served under the NSLP and the SBP. The SA's entitlement to financial assistance is determined by multiplying the number of units served within the State by a national average payment rate set by FNS. Section 201 of the HHFKA required FNS to provide an additional 6 cents per lunch in performance-based cash reimbursement for schools that are certified to be in compliance with meal pattern regulation and updated nutrient standards, which became effective for SY 2012–13.

FNS also provide donated food assistance to States for each lunch served in the NSLP at eleven cents per meal, in accordance with sections 6(c)(1)(A) of the Richard B. Russell National School Lunch Act (the Act) (42 U.S.C. 1755(c) and 1766(h)(1)(B)). Pursuant to section 6(c)(1)(B), the national average value of donated food assistance is subject to annual adjustments on July 1 of each year to reflect changes in a three-month average value of the Producer Price Index of Foods Used in Schools and Institutions for March, April, and May of each year. Section 17(h)(1)(B) of the Act provides that the same value of donated foods (or cash in lieu of donated foods) for school lunches must also be established for lunches and suppers served in the CACFP.

Each SA is also provided with funds—known as State Administrative Expense (SAE)<sup>123</sup> funds—for administrative expenses in supervising and providing technical assistance to local schools, school districts, and institutions in their conduct of CN programs, including the NSLP and the SBP. SAE funds are made available by means of a letter of credit in amounts determined by FNS based on the SA's initial SAE plan.

<sup>123</sup> See Code of Federal Regulations 7 CFR §235.6(a): <http://www.gpo.gov/fdsys/pkg/CFR-2013-title7-vol4/pdf/CFR-2013-title7-vol4-sec235-6.pdf>.

SAs are required to submit a SAE Funds Reallocation Report on the use of SAE funds to their FNS regional offices between March 1 and May 1 annually. By submitting the report, SAs can request additional SAE funds above their current grant level, or return unexpended funds to FNS. The total amount of unobligated SAE funds that may be carried over for obligation and expenditure in the next fiscal year is limited to 20 percent of the SA's initial SAE allocation. SAE funds are also subject to certain provisions of funds return. At the end of the fiscal year, each SA must return any unexpended funds beyond the 20 percent carryover limit to FNS as soon as practicable.

In addition, Section 201 of the HHFKA provided an additional \$50 million for FY 2012 and 2013 to support the implementation of the updated meal pattern requirements. Of the \$50 million, \$47 million was dedicated to helping the SAs with training, technical assistance, certification, and oversight of the implementation of the updated meal patterns. Of the \$50 million, \$3 million was reserved by FNS for each of the two years to support USDA administration of the updated meal pattern requirements.<sup>124</sup>

### *State Financing*

While the NSLP and the SBP are federally funded with separate reimbursement rates for free, reduced-price, and paid meals, each SA can decide whether participation in the programs is mandated or optional for its schools and SFAs, and whether or not additional funds of support would be needed. Expenditure of funds from State sources for administrative use of school meal programs cannot be less than expended or obligated in Fiscal Year 1977.<sup>125</sup> Under the NSLP, the amount of State revenues for program purposes is required to match no less than 30 percent of the funds received under Section 4 of the National School Lunch Act (NSLA) during the school year beginning July 1, 1980. The matching requirements are decreased if the per-capita income of any State is less than the per-capita income of the United States. Note that revenues derived from operation of school meal programs and from State revenues expended for salaries and administrative expense of programs are not considered in the amount of State revenues appropriated, or used specifically for program purposes. Applicable State revenues include: (1) State revenues disbursed by the SA to SFA for program purposes; (2) State revenues made available to SFAs and transferred to nonprofit school foodservice accounts by SFAs; and (3) State revenues used to finance the costs (other than State salaries or other State-level administrative costs) of the nonprofit school foodservice program.<sup>126</sup>

As noted in earlier sections, the HHFKA requires, beginning in SY 2011–12, that SFAs increase their paid meal prices in order to meet the prescribed weighted average price, or the difference between free and paid meal reimbursements. SFAs can also elect to subsidize the difference using non-Federal funding. Some SAs provide subsidies to help SFAs maintain low paid meal prices.

---

<sup>124</sup> See Code of Federal Regulations 7 CFR §210.3: <http://www.gpo.gov/fdsys/granule/CFR-2011-title7-vol4/CFR-2011-title7-vol4-sec210-3>.

<sup>125</sup> See Code of Federal Regulations 7 CFR §235.11(a): <http://www.gpo.gov/fdsys/granule/CFR-2011-title7-vol4/CFR-2011-title7-vol4-sec235-11>.

<sup>126</sup> See Code of Federal Regulation 7 CFR §210.17(a): <http://www.gpo.gov/fdsys/granule/CFR-2011-title7-vol4/CFR-2011-title7-vol4-sec210-17>.

### State Staff Resources

SA plans for the use of the SAE funds must be submitted for approval by October 1 of the initial fiscal year and include formulas calculating the amount of training required for upper-level management, system-level supervisory and operating personnel, and school-level personnel. The plan should include details on how staff training will promote the requirements of the NSLP.<sup>127</sup>

#### 9.3.2 Research Questions

This section addresses the following research questions:

- Does the SA provide financial resources for school meals to SFAs in the form of per-meal subsidies? What was the total amount given?
- Do SAs have adequate staffing resources for monitoring?
- Does the SA provide support for any other aspects of the school foodservice operation?
- Have SAs been able to fully use Federal funds provided to administer the NSLP and the SBP? What challenges have impeded SAs' ability to fully use Federal funds? What actions impacted SAs' ability to fully use Federal funds?
- Did SAs request funding reallocation for 2012–13? If not, what was the primary reason for not requesting reallocation?
- Are SAs using contracted staff (staff employed by contractors, not directly by the State) for certain functions?

#### 9.3.3 Results

##### State Use of Federal Funds

SAs receive Federal grant funds annually to administer the school-based CN programs. As part of the SAE plan submitted to FNS, SAs need to identify the total amount of budgeted funds to be provided from State resources. Also, at the end of the second fiscal year of the grant, SAs must return any unexpended funds to FNS. It is critical that Federal resources provided for administration of the FNS programs be used effectively to meet the NSLP and the SBP requirements. FNS is prepared to provide technical assistance and other support to SAs facing challenges in effectively using the NSLP and the SBP administrative resources.

TABLE 9.15 presents several specific challenges and actions that impeded SAs in their ability to fully use all Federal funds during SY 2012–13 and SY 2013–14. State policy (16 SAs) and gubernatorial mandates (7 SAs) are the two major types of challenge reported in both years. However, reports of challenges due to State policy have declined from 16 in SY 2012–13 to 13 in SY 2013–14. Reports of challenges such as union agreements and State legislation also declined—from six SAs to three SAs, and from nine SAs to four SAs, respectively—between SY 2012–13 and SY 2013–14. Among other types of challenges reported

<sup>127</sup> See Code of Federal Regulations 42 U.S.C §1776(b-e): <http://www.ecfr.gov/cgi-bin/text-idx?SID=38a65872861712080096421650165b46&node=pt7.4.235&rgn=div5>.

in SY 2013–14, four States indicated that staffing issues were a major challenge in fully using all Federal funds, and two SAs identified a complex hiring process as a challenge.

Sixteen of the SAs adopted hiring freezes in SY 2012–13, while 15 of the SAs adopted travel restrictions. Similarly, in SY 2013–14, 11 of the SAs adopted hiring freezes, while only 8 adopted travel restrictions. Work furlough actions were taken by fewer SAs in SY 2013–14 (4) than in SY 2012–13 (6); work shutdowns also dropped from two SAs in SY 2012–13 to one in SY 2013–14. These declines may also reflect improvements in State budgets as States recover from the recent economic recession. Six SAs cited “other” actions in SY 2012–13 and seven in SY 2013–14. Other actions included hiring and staffing practices and State restrictions.

The NSLA, amendment Section 361, requires SAs to support full use of the Federal administrative funds provided for the CN programs. Although the Federal administrative funds are specifically excluded from State budget restrictions or limitations, State CN directors listed hiring freezes, work furloughs, and travel restrictions as major actions that affected their ability to fully use of all Federal funds (TABLE 9.15).

TABLE 9.15 *Number of State Agencies Reporting Challenges and Actions That Affected Their Full Use of All Federal Funds, SY 2012–13 and SY 2013–14*

	SY 2012–13	SY 2013–14
<b>Type of challenge<sup>1</sup></b>	<b>(n=54)</b>	<b>(n=54)<sup>2</sup></b>
Union Agreements	6	3
State Policy	16	13
State Legislation	9	4
Governor Mandates	11	7
Other	6	8
Staffing	NR	4
Procurement Process	NR	1
Complex Hiring Process	NR	2
Contract Time Frame	NR	1
<b>Type Of Action<sup>3</sup></b>	<b>(n=54)</b>	<b>(n=55)</b>
Hiring Freezes	16	11
Work Furloughs	6	4
Travel Restrictions	15	8
Work Shutdowns	2	1
Other	6	7
High Turnover	NR	3
Complex Hiring Process	NR	2
State Hiring Practices	NR	1
State Restrictions	NR	1

<sup>1</sup> SA could select more than one challenge.

<sup>2</sup> *n* is less than 55 due to nonresponse.

<sup>3</sup> SAs could select more than one action.

**Source:** CN Director Survey SY 2012–13, questions B6 and B7; State CN Director Survey SY 2013–14, questions B8 and B9.

As noted earlier, the SA can determine whether additional support funds are needed. By submitting SAE Funds Reallocation Reports, SAs can request additional SAE funds above their current grant level, or return unexpended funds to FNS. SAs can also choose to carry over no more than 20 percent of the SA's initial SAE allocation as unobligated SAE funds for obligation and expenditure in the next fiscal year.

TABLE 9.16 examines the reasons that State CN directors gave for not requesting fund reallocations in SY 2012–13. Of 55 SAs, 42 did not request funds reallocation in SY 2012–13. More than 75 percent (32) of these State CN directors indicated that the primary reasons were that they “Did not have eligible projects or activities to fund” (15) and that “requesting reallocated funds would exceed the 20 percent carryover limitation” (17). No State selected “Available alternative funding sources” as a primary reason in SY 2012–13. Three SAs (7 percent) noted an inability to expend the reallocated funds within the specified time limit, a reallocation request process that was too burdensome, and other reasons for not requesting reallocation of State administrative expense funds. In the other category, one SA indicated that alternative funding sources were available in addition to the SAE funding, and one SA cited all the reasons listed as primary reasons for not requesting reallocation of SAE funds.

TABLE 9.16 *Reasons CN Directors Did Not Request Reallocation of State Administrative Expense Funds in SY 2012–13*

Primary Reason	SY 2012–13 (percent) <sup>1</sup>
Did Not Have Eligible Projects or Activities to Fund	35.7
Would Have Been Unable to Expend Reallocated Funds in the Specified Time Limit	7.1
Requesting Reallocated Funds Would Exceed the 20 Percent Carryover Limitation	40.5
Alternative Funding Sources Were Available	0.0
Reallocation Request Process Was Too Burdensome	7.1
Reallocation Reporting Process Was Too Burdensome	2.4
Other	7.1

<sup>1</sup> Percentage of the 42 SAs not requesting reallocation.

Source: CN Director Survey SY 2013–14, questions B7 and B7a.

FNS provides SAE reallocation funds to each SA for State-level allowable, non-routine activities, such as special one-time projects, that are essential to increasing the efficiency and effectiveness of the administration of CN Programs, including the Food Distribution Program for CN Programs, which provides USDA Foods to applicable programs such as the NSLP and the SBP. SAE funds may be used by SAs in any of these program areas without regard to the basis on which the funds were earned and allocated. This provides SAs with efficiency and flexibility in the use of funds. SAs are encouraged to use SAE funds, to the maximum extent allowable and practicable, to minimize the charges imposed on SFAs for the storage and distribution of USDA Foods and related administrative costs under the Food Distribution Program for CN Programs.

Thirty-two SAs reported that they had used SAE funds to improve the operation of the USDA Foods program in their State. As shown in TABLE 9.17, 20 of the 32 SAs indicated that SAE funds were used in SY 2013–14 to improve staff skills to administer USDA Foods. Twenty SAs also indicated they used SAE funds to pay the salaries or fringe benefits for staff. Training and salary were the two most frequent uses of SAE funds. The CN directors of 14 States reported that they used SAE funds to improve the USDA Foods distribution, and nine SAs applied the funds to USDA Foods storage. Three State CN directors mentioned that SAE funds were used to purchase business solutions, such a Management Analysis and Reporting System, point-of-sale and e-payment technology, and the SDA system. Technical assistance, rebates for shipping/storing, and supplies/equipment were cited once each by State CN directors.

TABLE 9.17 *CN Directors' Use of SAE Funds to Improve USDA Food Programs, SY 2013–14*

Food Program	Number of State Agencies (n=32) <sup>1</sup>
USDA Foods Storage	9
USDA Foods Distribution	14
Staff Skills to Administer USDA Foods (e.g., Training)	20
Salaries or Fringe Benefits for Staff Administering USDA Foods	20
Other	
Other Systems (e.g., MARS Data System, SDA System)	3
Technical Assistance	1
Rebates for Shipping/Storing	1
Supplies and Equipment	1

<sup>1</sup> 32 SAs used SAE funds to improve the operation of the USDA Foods program. State agencies could report support of more than one program.

Source: CN Director Survey SY 2013–14, question B6a.

### *State Subsidies to SFAs*

In addition to Federal reimbursement provided to SAs to assist them in administering school meal programs, SAs can choose to further subsidize the school-based breakfast or lunch programs using non-Federal funds and resources to help SFAs maintain lower paid meal prices. TABLE 9.18 shows that more than half of States provide a subsidy to the SBP, the NSLP, or both across a three-year span. The percentage of SAs providing subsidies for neither breakfasts nor lunches increased from 36 percent in SY 2012–13 to 46 percent in SY 2013–14. The percentage of SAs that provided subsidies for both breakfast and lunch programs dropped to 38 percent in SY 2013–14 from 49 percent in SY 2012–13 and 42 percent in SY 2011–12. The increasing number of SAs that chose not to subsidize SFAs for either breakfast or lunch programs may indicate that Federal financial assistance and revenues collected by increasing paid meal prices provide adequate funding for most SFAs.

During SY 2012–13, SAs gave a total of \$6,791,041 to SFAs for breakfast programs and \$52,511,392 for lunch programs. The average State subsidy given to SFAs was \$271,642 for breakfast and \$2,283,104 for lunch. Additionally, FNS provided States 22.75 cents per lunch served in the NSLP and per lunch and supper served in the CACFP in SY 2012–13 as the national average value of donated foods, or cash in lieu thereof.<sup>128</sup>

<sup>128</sup> USDA, FNS. "National Average Minimum Value of Donated Foods for the Period July 1, 2012 Through June 30, 2013; Notices," 77 *Federal Register* 142 (24 July 2012), pp. 43232. [http://www.fns.usda.gov/sites/default/files/SY13\\_CommodityMealRate\\_July12.pdf](http://www.fns.usda.gov/sites/default/files/SY13_CommodityMealRate_July12.pdf).

TABLE 9.18 *Percentage of State Agencies That Provided a Subsidy to SFAs for Breakfast or Lunch, SY 2011–12, SY 2012–13, and SY 2013–14*

Subsidy provided for:	SY 2011–12 (n=53) <sup>1</sup>		SY 2012–13 (n=53) <sup>1</sup>		SY 2013–14 (n=55)	
	Number	Percent	Number	Percent	Number	Percent
Breakfast Only	5	9.4	3	5.7	5	9.1
Lunch Only	6	11.3	5	9.4	4	7.3
Both Breakfast and Lunch	22	41.5	26	49.1	21	38.2
Neither	20	37.7	19	35.8	25	45.5

<sup>1</sup> n is less than 54 due to item nonresponse.

**Source:** CN Director Survey SY 2011–12, question B1a; CN Director Survey SY 2012–13, question B1a; CN Director Survey SY 2013–14, question B1a.

SAs may provide different types of subsidies to SFAs for breakfast and lunch programs, including per-meal reimbursements (which are provided specifically to support free and reduced-price meals), annual lump sums, supplements to cover specific costs, and subsidies based on the percentage of low-income students.

As shown in TABLE 9.19, per-meal reimbursement remained the most frequently used form of subsidy for both breakfasts and lunches across all three school years; however, its use fell for breakfast in SY 2013–14. Per-meal reimbursements grew from about half of breakfasts (46 percent) and lunches (52 percent) in SY 2011–12 to 68 percent of breakfasts and 61 percent of lunches in SY 2012–13. In SY 2013–14, 54 percent and 64 percent of SAs cited having used this subsidy for breakfasts and lunches, respectively.

The use of breakfast subsidies through an annual lump sum fluctuated among SAs from SY 2011–12 to SY 2013–14. The percentage using this method to subsidize breakfasts declined from 12 percent in SY 2011–12 to no SAs reporting using annual lump sum subsidies in SY 2012–13. However, in SY 2013–14, 19 percent of SAs cited subsidizing breakfasts in this manner. TABLE 9.19 also shows that lump sum subsidies for lunches fell from 15 percent in SY 2011–12 to 7 percent in SY 2012–13, and then increased to 12 percent in SY 2013–14. Financial allowances to cover specific costs were provided by 15 percent of SAs to subsidize breakfasts in SY 2011–12, declining to 11 percent in SY 2012–13. By SY 2013–14, just 4 percent of SAs used supplements to cover the costs for breakfasts. A similar pattern was seen for lunches. Breakfast subsidies based on the percentage of low-income students were reported by 4 percent of SAs in SY 2011–12, and zero percent in SY 2012–13; however, usage increased to 8 percent in SY 2013–14. Across the three years, no SAs based lunch subsidies on the percentage of low-income students.

The number of SAs using other methods to subsidize breakfasts increased from 23 percent in SY 2011–12 and 21 percent in SY 2012–13 to 35 percent in SY 2013–14. The percentage using other methods to subsidize lunches grew from 22 percent in SY 2011–12 and 25 percent in SY 2012–13 to 36 percent in SY 2013–14. Some SAs reported using a combination of per-meal reimbursements and at least one additional type of subsidy in both SY 2012–13 and SY 2013–14 (approximately 7 percent and 11 percent, respectively). The most common reported other types of subsidies were listed as “State match” and “reduced price charge.”

TABLE 9.19 *Percentage of State Agencies That Provided Different Types of Subsidies and Support for School Lunch and Breakfast, SY 2011–12, SY 2012–13, and SY 2013–14*

Type of Subsidies	Percentage of State Agencies					
	Lunch			Breakfast		
	SY 2011–12 (n=27)	SY 2012–13 (n=28)	SY 2013–14 (n=25)	SY 2011–12 (n=26)	SY 2012–13 (n=28)	SY 2013–14 (n=26)
Among State Agencies Providing a Subsidy, it is Provided Through:						
Per-Meal Reimbursement	51.9	60.7	64.0	46.2	67.9	53.9
Annual Lump Sum	14.8	7.1	12.0	11.5	0.0	19.2
Supplement to Cover Specific Costs	11.1	7.1	4.0	15.4	10.7	3.9
Based on Percentage of Low-Income Students	0.0	0.0	0.0	3.9	0.0	7.7
Other	22.2	25.0	36.0	23.0	21.4	34.6

**Note:** For SY 2013–14, respondents could select more than one type of subsidy so, the percentages may not sum to 100 percent.

**Source:** CN Director Survey SY 2011–12, questions B1b and B2; CN Director Survey SY 2012–13, questions B1b and B2; CN Director Survey SY 2013–14, questions B1b and B2.

TABLE 9.20 shows that the percentage of SAs providing financial or personnel support for school foodservices operations declined across all subsidy types from SY 2011–12 to SY 2013–14. Additionally, the number of SAs providing support through any of these mechanisms also declined from 25 SAs in SY 2011–12 to 21 SAs in SY 2013–14 (not shown in table). Reimbursable meal preparation support decreased from 28 percent in SY 2011–12 to 16 percent in SY 2013–14, but remained the most common form of assistance reported by SAs. From SY 2011–12 to SY 2013–14, the largest decrease was observed in the percentage of SAs that supported storage for foodservice operations (from 22 percent to 7 percent), followed by support for equipment, from 24 percent to 11 percent. The provision of non-reimbursable meal preparation support to foodservice operations was reported by only 4 percent of SAs in SY 2013–14, after remaining level at approximately 13 percent in both SY 2011–12 and SY 2012–13.

Notable decreases in support were also observed in claims preparations, contracted services, and overhead and indirect cost subsidies. The percentage of SAs providing support for preparing claims decreased from 22 percent in SY 2011–12 to 19 percent in SY 2012–13, and then dropped further to only 11 percent in SY 2013–14. Contracted services and overhead/indirect costs both decreased from 19 percent and 17 percent in SY 2011–12 to 11 percent and 13 percent in SY 2013–14, respectively.

TABLE 9.20 *Percentage of State Agencies That Provided Different Types of Subsidies and Support for Food Service Operations, SY 2011–12, SY 2012–13, and SY 2013–14*

Type of Subsidies	Percentage of State Agencies		
	SY 2011–12 (n=54)	SY 2012–13 (n=53) <sup>1</sup>	SY 2013–14 (n=55)
Among All SAs, Financial or Personnel Support for School Foodservice Operations at the SFA Level:			
Reimbursable Meal Preparation	27.8	20.8	16.4
Non-Reimbursable Meal Preparation	13.0	13.2	3.6
Equipment	24.1	18.9	10.9
Preparing Claims	22.2	18.5	10.9
Storage	22.2	11.1	7.3
Contracted Services	18.5	14.8	10.9
Overhead/Indirect Costs	16.7	18.9	12.7
Other	13.0	14.8	12.7

<sup>1</sup> n is less than 54 due to item nonresponse.

**Note:** Recoding for answers categorized as other in SY 2011–12, SY 2012–13, and SY 2013–14 occurred during the SN-OPS, SY 2013–14 analysis.

**Source:** CN Director Survey SY 2011–12, questions B1b and B2; CN Director Survey SY 2012–13, questions B1b and B2; CN Director Survey SY 2013–14, questions B1b and B2.

### Staffing

CN directors were asked to indicate to what degree their current staffing was adequate for monitoring CN program operations. Shown in FIGURE 9.1, more SAs simultaneously reported that their current staffing was not adequate (33 percent) and somewhat adequate (47 percent) in SY 2013–14, compared to the prior year. The percentage of SAs reporting somewhat adequate staff increased from SY 2012–13 (39 percent), returning to levels more similar to those reported in SY 2011–12 (50 percent).

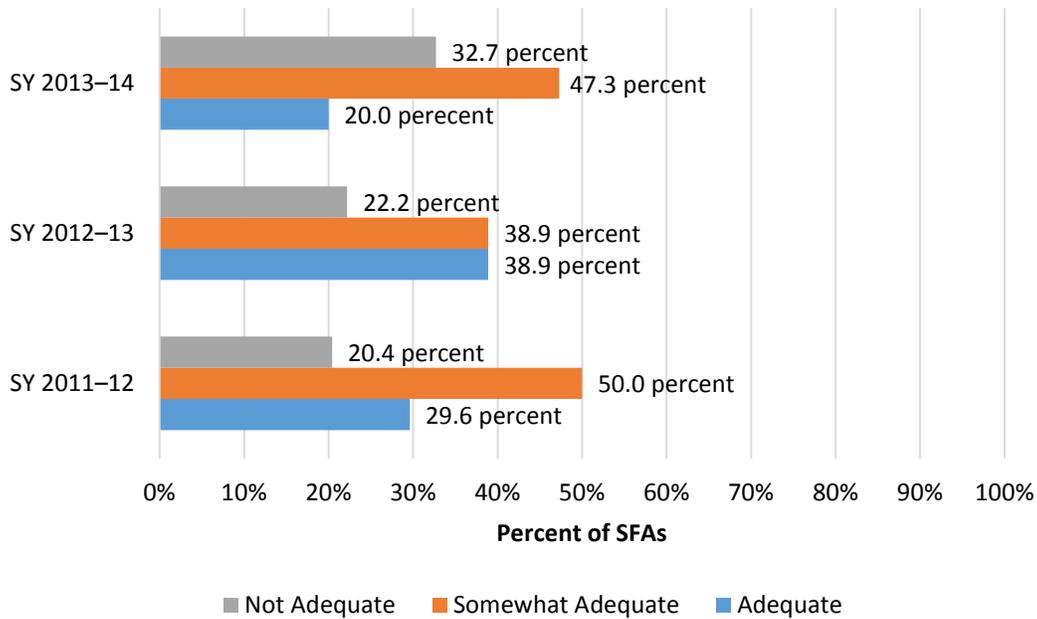
Section 201 of the HHFKA provided an additional \$50 million in FY 2012 and FY 2013 to assist with implementation of the updated meal pattern requirements. While these funds were made available to the SAs, TABLE 9.21 suggests that inadequate staffing was at least partially affected by whether SAs fully used available funding. The percentage of SAs with unobligated available funding more than doubled in FY 2013, with 19 percent of SAs neglecting to obligate over 90 percent of their available funding, whereas only 9 percent of SAs held more than 90 percent of their available funding unobligated for FY 2012.

In contrast, the percentage of SAs utilizing *all* of their available funding decreased by nearly half, with only 37 percent of SAs obligating 100 percent of their available funding for FY 2013, while over 70 percent of SAs obligated 100 percent of their FY 2012 funds. Additionally, 20 percent of SAs had between 25 percent and 50 percent of their available funds unobligated for FY 2013, while only 2 percent did so in FY 2012.

Summarily, most SAs obligated all of their funding for FY 2012, but only half did so for funding made available in FY 2013. A connection between the SAs' full use of available funding and the level of

adequacy of staffing may exist; however, it is difficult to determine the degree of the potential impact. For instance, although fewer SAs obligated 100 percent of their available funding in FY 2013, the percentage of SAs that reported their current staffing as inadequate increased overall, from 20 percent in SY 2011–12 to 32.7 percent in SY 2013–14.

FIGURE 9.1 *Adequacy of Current Staffing for Monitoring Program Operations, SY 2011–12, SY 2012–13, and SY 2013–14*



Source: CN Director Survey SY 2011–12, question B4; CN Director Survey SY 2012–13, question B4; CN Director Survey SY 2013–14, question B4.

TABLE 9.21 *Percentage of States With Unobligated Funds*

Distribution <i>n</i> =54	FY 2012 (States w/ unobligated funds)	Percent of States	FY 2013 (States w/ unobligated funds)	Percent of States
≥90 percent unobligated	5	9.3	10	18.5
75–89 percent unobligated	2	3.7	2	3.7
50–74 percent unobligated	0	0.0	5	9.3
25–50 percent unobligated	1	1.9	11	20.4
≤25 percent unobligated	8	14.8	6	11.1
0 percent unobligated	38	70.4	20	37.0

**Source:** Data provided by FNS regarding Sec. 201 State funding.

One strategy for containing costs is to outsource monitoring and other operational responsibilities. TABLE 9.22 shows the use of contracted staff by functional use, including monitoring program operation, technical assistance, claims processing, and nutrition education. An increasing number of SAs used contracted staff for monitoring, while fewer SAs used staff for nutrition and education and claims processing. The trend of contracting staff for technical assistance has increased from SY 2011–12, but one fewer SA reported hiring contracted staff for technical assistance in SY 2013–14 (26) than SY 2012–13 (27). Among other functions reported by State CN directors, seven SAs indicated that contracted staff were used for nutrient analysis and training. Five SAs used contracted staff for support with technology issues, and five SAs reported that contracted staff were used for training specific to the 6 cent certification process.

TABLE 9.22 *Number of State Agencies Reporting on the Use of Contracted Staff, by Functional Use, for SY 2011–12, SY 2012–13, and SY 2013–14*

Type of Functions	Number of State Agencies		
	SY 2011–12 (n=54)	SY 2012–13 (n=54)	SY 2013–14 (n=55)
Functions for Which State is Using Contracted Staff <sup>1</sup>			
Monitoring	18	17	23
Technical Assistance	20	27	26
Claims Processing	3	3	1
Nutrition Education	22	24	20
Other	16	14	20
Nutrient Analysis and Training	NR	NR	7
Technology Staff	NR	NR	5
SFA Training 6 Cent Certification Process	NR	NR	5
Administrative Support/Outreach	NR	NR	1
Healthier US School Challenge (HUSC) Certification	NR	NR	1
Temporary employees	NR	NR	1

<sup>1</sup> SAs could select more than one function.

**Source:** CN Director Survey SY 2011–12, question B7; CN Director Survey SY 2012–13, question B8; CN Director Survey SY 2013–14, question B10.

## 10 Conclusion

SN-OPS, SY 2013–14 assessed descriptive data on the operations of the CN programs. In SY 2013–14, most SFAs reported that all of their schools participated in the NSLP and that participation in the SBP continued to grow. Ninety-seven percent of SFAs included in this study reported that they were certified to receive the additional 6-cents reimbursement from satisfying the updated meal pattern requirements, and SFAs reported high use of Smarter Lunchroom strategies to encourage healthy eating. SFAs anticipated challenges in meeting the whole grain-rich requirements for breakfast and lunch in SY 2013–14: only one in five knew the sodium content of their meals. However, SFAs were changing their orders of USDA Foods to help achieve updated standards. Meal prices continued to rise, and some SFAs indicate raising nonprogram food prices in response to the Paid Lunch Equity provision. Forty-seven SFAs implemented the updated Administrative Review process, reporting that it took more time to complete a review, but was generally more accurate.

A majority of SFAs (more than 60 percent) reported noticing that students wasted more vegetables in SY 2013–14. Increased plate waste was noticed for items such as cooked vegetables, raw vegetables, main dish, fruit, and bread/grain. A majority of the SFAs reporting increased plate waste, attributed it to new food items being served. More than half of all SFAs reported that gaining student acceptance and maintaining student participation since implementation of the updated meal requirements has been very or extremely challenging.

Paper applications remained the most prevalent form of application for free or reduced-price meals, and eligibility determinations were more likely to be made manually across most eligibility bases. Of the Special Assistance Alternatives, Provision 2 was most prevalent. Participation in the Community Eligibility Provision increased, as it became available in 11 States, up from 7 States in SY 2012–13. A majority of the SFAs operated at or above the break-even level, with larger SFAs being more likely to break even.

During SY 2013–14, 32 CN directors reported that they had used SAE funds to improve the operation of their USDA Foods program. The percentage of SFAs that provided subsidies for both breakfast and lunch programs dropped to 38 percent in SY 2013–14 from 49 percent in SY 2012–13. Additionally, the percentage of SFAs that provided different types of subsidies (e.g. reimbursable meal preparation, equipment, preparing claims, storage) decreased between SY 2013–14 and SY 2012–13. SFAs with unobligated available funding increased in FY 2013, with 19 percent of SFAs neglecting to obligate over 90 percent of their available funding, whereas only 9 percent of SFAs held more than 90 percent of their available funding unobligated for FY 2012.

Data systems were implemented in school systems, connecting State offices to site-level information. The majority of SFAs began using standardized, computer-based reporting prior to 2004. SFAs are able to link their CN program to computer-based reporting systems and use the computer-based reporting systems to verify site-level information, such as meal claiming and certification status. State CN directors reported overall satisfaction with matching in their computer-based systems.

These findings suggest that the CN programs are adjusting to updated program regulations and policies, improving the nutritional content of school meals, increasing participations, while seeking to reduce cost through administrative efficiencies.

Appendix A SFA Director Survey SY 2013–14

## Special Nutrition Program Operations Study

# SN-OPS

### School Food Authority (SFA) Director Survey SY 2013-14

**This copy is for reference purposes  
only. Please record all responses at:**

**<http://www.sfasureveyyear3.com/>**

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0562. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the information collection.



U.S. Department of Agriculture  
Food and Nutrition Service

This survey is being conducted for the Food and Nutrition Service, U.S. Department of Agriculture as part of a study of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other USDA food programs throughout the country. All responses will be kept private; no names will be used in our reports, and only aggregated results will be reported.

Section 305 of the Healthy, Hunger-Free Kids Act of 2010 states that "States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts."

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to:

U.S. Department of Agriculture  
Food and Nutrition Service  
Office of Policy Support  
Alexandria, VA 22302  
Attn: Dr. Allison Magness

**We thank you for your cooperation and participation in this very important study.**

## INSTRUCTIONS

Please answer all questions.

Unless you see the words CHECK ALL THAT APPLY after a question, please check only one answer for each question.

If you have any questions about the study or about completing this survey, please email [SFASurveyHelp@2mresearchservices.com](mailto:SFASurveyHelp@2mresearchservices.com) or call 1-866-465-7738 (toll-free).

Date: |\_|\_| / |\_|\_| / |\_|\_|\_|\_|  
Month Day Year

School District Name(s): \_\_\_\_\_

### Contact Information for the SFA Director:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Phone Number: |\_|\_|\_| - |\_|\_|\_| - |\_|\_|\_|\_|\_|\_|  
Area Code Number Extension

Email Address: \_\_\_\_\_

### Name and address of person filling out this survey if other than the SFA Director:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Phone Number: |\_|\_|\_| - |\_|\_|\_| - |\_|\_|\_|\_|\_|\_|  
Area Code Number Extension

Email Address: \_\_\_\_\_

**SECTION 1. SCHOOL PARTICIPATION**

START TIME: \_\_\_\_:\_\_\_\_

The first few questions are about the number of schools in your school food authority (SFA) participating in the school breakfast and lunch programs during the 2013–2014 school year.

1.1 For this question, please record your responses separately for elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade); middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9); or high schools (i.e., schools that have no grade lower than 9 and continue through 12th grade). If any school does not meet the elementary, middle or junior high, or high school definition, please include it in the “other school” column and describe it briefly under item f.

Please answer the following questions for the 2013-2014 school year:

NUMBER OF SCHOOLS	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL	TOTAL
a. How many <b>schools</b> in your SFA are participating in both the School Breakfast Program (SBP) and the National School Lunch Program (NSLP)?.....	_ _ _	_ _ _	_ _ _	_ _ _	_ _ _
b. How many <b>schools</b> in your SFA are participating in <b>SBP only</b> ? .....	_ _ _	_ _ _	_ _ _	_ _ _	_ _ _
c. How many <b>schools</b> in your SFA are participating in <b>NSLP only</b> ? .....	_ _ _	_ _ _	_ _ _	_ _ _	_ _ _
d. How many <b>schools</b> in your SFA are NOT participating in either SBP or NSLP? .....	_ _ _	_ _ _	_ _ _	_ _ _	_ _ _
e. What is the total number of <b>schools</b> in your SFA? .....	_ _ _	_ _ _	_ _ _	_ _ _	_ _ _

f. Please identify the grade spans included in schools listed under “other school.”

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**1.2 Please answer for the 2013-2014 school year:**

NUMBER OF SCHOOLS	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL	TOTAL
a. How many <b><u>schools</u></b> in your SFA are participating in the NSLP Afterschool Snack Program?.....					
b. How many <b><u>schools</u></b> in your SFA are participating in the At-Risk Supper Program? .....					
c. How many <b><u>schools</u></b> in your SFA are participating in SBP as severe need schools (where 40% or more of the lunches served by the school were free or reduced-price in school year 2011-2012)? .....					
d. How many <b><u>schools</u></b> in your SFA participated as Seamless Summer Option sites in summer 2013? .....					

## SECTION 2. STUDENT PARTICIPATION

The next few questions are about the number of children enrolled in the school(s) you serve, and their participation in the school breakfast and lunch programs during the 2013–2014 school year.

**2.1** For these questions, please record your responses separately for elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade); middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9); or high schools (i.e., schools that have no grade lower than 9 and continue through 12th grade). If any school does not meet the elementary, middle or junior high, or high school definition, please include it in the “other school” column.

Please answer for the 2013-2014 school year:

NUMBER OF STUDENTS	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL	TOTAL
a. As of October 31, what was the total number of <b>students</b> enrolled in your SFA?*	_____	_____	_____	_____	_____
b. How many of the total enrolled <b>students</b> do not have access to SBP?*	_____	_____	_____	_____	_____
c. How many of the total enrolled <b>students</b> do not have access to NSLP?*	_____	_____	_____	_____	_____
d. How many of the total enrolled <b>students</b> were approved to receive free meals?	_____	_____	_____	_____	_____
e. How many of the total enrolled <b>students</b> were approved to receive reduced price meals? .....	_____	_____	_____	_____	_____
f. What was the average daily attendance for the month of October 2013?*	_____	_____	_____	_____	_____

\* The total school enrollment should include kindergarten students who attend school half day and do not have access to meals. Children attending a school that does not have the NSLP or the SBP should also be included in this count.

\*\* Calculate the average daily attendance for students in each type of school and place in the appropriate column. For the Total column, calculate the average daily attendance for all students, across all schools, in the district. Calculate average daily attendance by dividing the total number of student days by the number of calendar days school is in session.

**2.2** For each school type, how many breakfast and lunch serving days were there in the 2013–2014 school year?

If there are differences among schools within your school district for number of serving days, provide the average number of serving days for the district. Do not include serving days for summer food service or other special programs that occur when the district is not in session.

NUMBER OF SERVING DAYS	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL	TOTAL
a. Breakfast .....	_____	_____	_____	_____	_____
b. Lunch .....	_____	_____	_____	_____	_____

**SECTION 3. FOOD SERVICE OPERATIONS**

The following questions are about food service operations for the 2013-2014 school year.

**3.1 Special Provision Options include:**

- **Provision 1**—Reducing certification to once every two years
- **Provision 2**—Reducing certification to once every four years, with claiming based on derived percentages
- **Provision 3**—Reducing certification to once every four years, with claiming based on prior funding levels
- **Community Eligibility Provision (CEP)**—Eliminating household applications in high poverty local educational agencies (LEAs) and schools, with claiming based on direct certification percentages (only available in a limited number of States)

Does your SFA have any schools operating under Special Provision Options (Provisions 1, 2, 3, and CEP)?

- 1  Yes
- 2  No → SKIP TO QUESTION 3.3

**3.2 How many schools are operating under the following Special Provision Options for NSLP and SBP?**

SPECIAL PROVISION OPTION	NSLP ONLY	SBP ONLY	BOTH NSLP AND SBP
a. Provision 1.....			
b. Provision 2.....			
c. Provision 3.....			
d. CEP .....			

**3.3 How likely is it that any schools in your LEA (including those currently operating under Provision 1, 2, or 3), would elect the CEP when the provision becomes available nationwide in school year 2014-2015?**

**MARK ONE**

- 1  Very likely
- 2  Likely
- 3  Unlikely
- 4  Very unlikely
- D  Don't know

**3.4 Which of the following formats is used for the application that parents use to apply for free or reduced-price school meals for their children for the 2013-2014 school year?**

MARK ALL THAT APPLY

- 1  Web-based or computer-based application
- 2  Computer-read or scannable paper application
- 3  Manually entered paper application
- 4  N/A—No parents in district submit applications for school meals → SKIP TO QUESTION 4.1

If you marked more than one response in 3.4, proceed to question 3.5. Otherwise, skip to question 3.6.

**3.5 What was the primary format of the application that parents use to apply for free or reduced-price school meals for their children for the 2013-2014 school year?**

MARK ONE

- 1  Web-based or computer-based application
- 2  Computer-read or scannable paper application
- 3  Manually entered paper application → SKIP TO QUESTION 3.8

**3.6 Is the web-based or computer-based application integrated with any of the following data systems?**

	YES	NO
a. Meals claiming system .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Point-of-sale system.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Student records.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Direct certification.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**3.7 Who developed your local education agency's web-based or computer-based application processing system?**

	YES	NO
a. State child nutrition information technology (IT) staff.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. State IT staff from agencies other than child nutrition .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Other, non-IT State staff.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. District IT staff .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other, non-IT district staff.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Vendor or contractor .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
g. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**3.8 For each basis for eligibility listed below, how is the determination of eligibility made when processing applications—manually by the determining official, or automatically (for example, by a computer algorithm, software program, or calculations performed with formulas in a spreadsheet)?**

SELECT ONE RESPONSE PER ROW

BASIS FOR ELIGIBILITY	SELECT ONE RESPONSE PER ROW	
	MANUAL DETERMINATION	AUTOMATED DETERMINATION
a. Household income .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Assistance program case number (for example, SNAP, FDIPIR, or TANF)* .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Child enrolled in Head Start or Even Start .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Foster child .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Homeless, migrant, or runaway child .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

\* SNAP is the Supplemental Nutrition Assistance Program (formerly known as Food Stamps). FDIPIR is the Food Distribution Program on Indian Reservations. TANF is Temporary Assistance for needy families.

**3.9 Does your LEA perform verification for cause (that is, verify questionable applications in addition to verifying the sample selected at random)?**

- 1  Yes
- 2  No → SKIP TO QUESTION 4.1

**3.9a Does your LEA use standardized criteria to identify questionable applications for verification for cause?**

- 1  Yes
- 2  No

**SECTION 4. COOPERATIVE PURCHASING**

A purchasing cooperative is an agreement between two or more SFAs to procure services or goods as a collective unit. Purchasing cooperatives are also known as co-ops, group purchasing organizations (GPOs), or group buying organizations. This section asks about cooperatives, cooperative purchasing, and the role of advisory councils.

**4.1 Does your SFA use a management company or have a cooperative purchasing agreement to manage the procurement of USDA Foods or commercial products?**

	YES	NO
a. Management company.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Cooperative purchasing agreement.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

If you marked “no” to 4.1a and 4.1b, skip to question 4.4. Otherwise, go to question 4.2.

**4.2 Does your SFA pay administrative fees to the management company or cooperative to oversee the purchase of USDA Foods?**

- 1  Yes
- 2  No

**4.3 How does your SFA oversee the execution of the contract or cooperative agreement?**

	YES	NO
a. SFA reviews invoices regularly.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. SFA provides feedback to management company or cooperative.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. SFA has advisory council to provide feedback to management company or cooperative.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. SFA meets with vendors to ensure representation in purchasing decisions.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other ( <i>Specify</i> ).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**4.4 Does your SFA or cooperative have an advisory council that provides input on ordering USDA Foods or commercial foods?**

- 1  Yes
- 2  No → SKIP TO QUESTION 5.1

**4.4a Does the advisory council gather information from your SFA, and, if applicable, from other SFAs it advises to inform its decision-making process?**

- 1  Yes
- 2  No
- D  Don't know

**4.4b Are advisory council members elected?**

- 1 Yes
- 2 No
- D Don't know

**4.4c On average, how long do council members typically serve, whether they are elected or not?**

|\_|\_| MONTHS OR |\_|\_| YEARS

- D Don't know

**SECTION 5. NEW MEAL PATTERN REQUIREMENTS**

This section asks about steps that your school district is taking to implement the new meal patterns.

**GENERAL IMPLEMENTATION**

**5.1 As you continue to implement the new meal patterns, how challenging is each of the following?**

SELECT ONE RESPONSE PER ROW

	NOT CHALLENGING	A LITTLE CHALLENGING	MODERATELY CHALLENGING	VERY CHALLENGING	EXTREMELY CHALLENGING	NOT APPLICABLE	DONT KNOW
a. Finding products that meet standards.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
b. Maintaining student participation .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
c. Separating portions when age-grade groups overlap.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
d. Maintaining budget/food costs.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
e. Student acceptance.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
f. Parent/ community acceptance .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
g. Foodservice staff acceptance.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>
h. Obtaining foodservice equipment.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	D <input type="checkbox"/>

**5.2 In comparison to before the implementation of the new meal pattern requirements, have you noticed any changes in the amount of food students waste or throw away at lunchtime?**

SELECT ONE RESPONSE PER ROW

	STUDENTS WASTE MORE	STUDENTS WASTE LESS	NO CHANGE	DON'T KNOW
a. Fluid milk .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
b. Main dish/entrée .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
c. Bread/grain items .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
d. Salad/raw vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
e. Cooked vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
f. Fruit .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
g. Desserts .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>
h. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	D <input type="checkbox"/>

**5.3 If you have observed a change in the amount of food wasted, is this due to:**

N/A – Did not observe a change in the amount wasted → SKIP TO QUESTION 5.4

	YES	NO
a. The amount of time available to eat? .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Serving new food items? .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. The amount of food served? .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Using different preparation methods? .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Another reason ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**5.4 Please indicate whether or not it has been a challenge meeting the new requirements for each of the following breakfast standards.**

N/A – SFA does not have a breakfast program → SKIP TO QUESTION 5.5

BREAKFAST STANDARDS	NOT A CHALLENGE	CHALLENGES ENCOUNTERED
a. Whole grains .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Non-whole grains .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Fluid milk .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Minimum average daily calories .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Maximum average daily calories .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Trans-fat limit .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
g. Average daily saturated fat amount .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

The next few questions ask about fruit, vegetables, and whole grains.

**5.5** Since implementing the new meal patterns, how has the frequency with which you use each type of fruit product changed in order to meet the additional fruit requirements for **lunch**? *If you currently do not use a type of fruit product but used it before implementing the new meal patterns, mark "use less often." If you currently do not use a product and also did not use it before, mark "same frequency."*

	USE LESS OFTEN	SAME FREQUENCY	USE MORE OFTEN
a. Fresh whole.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
b. Fresh pre-cut.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
c. Frozen whole.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
d. Frozen pre-cut.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
e. Canned with water.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
f. Canned with juice.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
g. Canned with light syrup.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
h. Canned with heavy or regular syrup.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
i. 100% fruit juice.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
j. Dried fruit.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>

**5.6** Since implementing the new meal patterns, how has the frequency in which you use each type of vegetable product changed in order to meet the additional vegetable requirements for **lunch**? *If you currently do not use a type of vegetable product but used it before implementing the new meal patterns, mark "use less often." If you currently do not use a product and also did not use it before, mark "same frequency."*

	USE LESS OFTEN	SAME FREQUENCY	USE MORE OFTEN
a. Fresh whole.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
b. Fresh pre cut.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
c. Frozen whole.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
d. Frozen pre cut.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
e. Canned, no salt added.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
f. Canned reduced sodium.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
g. Canned regular sodium.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>

**5.7 Since implementing the new meal patterns for breakfast, how challenging has it been to meet the 50 percent whole grain-rich requirements?**

MARK ONE

- 1  Not challenging
- 2  A little challenging
- 3  Moderately challenging
- 4  Very challenging
- 5  Extremely challenging

**5.8 What practices did you implement in order to meet the 50 percent whole grain-rich requirements for breakfast?**

MARK ALL THAT APPLY

- 1  Discontinue or change some menu options
- 2  Alter recipes
- 3  Purchase whole grain-rich products
- 4  Order whole grain-rich products from USDA Foods more often
- 5  Substitute whole grain-rich items for non-whole grain-rich items
- 6  Add whole grain-rich items to the menu
- 7  Increase portion sizes of some items
- 8  No changes—SFA already met the 50 percent whole grain-rich requirements
- 9  Other (*Specify*): \_\_\_\_\_
- 10  Don't know

**5.9 What challenges do you anticipate for meeting the 100 percent whole grain-rich requirements for breakfast in school year 2014-2015?**

MARK ALL THAT APPLY

- 1  Availability of products that meet standards
- 2  Increased food costs
- 3  Student acceptance
- 4  Understanding the new requirements
- 5  Training of staff
- 6  No challenges—SFA already meets the 100 percent whole grain-rich requirements
- 7  Other (*Specify*): \_\_\_\_\_

**5.10 Since implementing the new meal patterns for lunch, how challenging has it been to meet the 50 percent whole grain-rich requirements?**

MARK ONE

- 1  Not challenging
- 2  A little challenging
- 3  Moderately challenging
- 4  Very challenging
- 5  Extremely challenging

**5.11 What practices did you implement in order to meet the 50 percent whole grain-rich requirements for lunch?**

MARK ALL THAT APPLY

- 1  Discontinue or change some menu options
- 2  Alter recipes
- 3  Purchase whole grain-rich products
- 4  Order whole grain-rich products from USDA Foods more often
- 5  Substitute whole grain-rich items for non-whole grain-rich items
- 6  Add whole grain-rich items to the menu
- 7  Increase portion sizes of some items
- 8  No changes—SFA already met the 50 percent whole grain-rich requirements
- 9  Other (*Specify*): \_\_\_\_\_
- 0  Don't know

**5.12 What challenges do you anticipate for meeting the 100 percent whole grain-rich requirements for lunch in school year 2014-2015?**

MARK ALL THAT APPLY

- 1  Availability of products that meet standards
- 2  Increased food costs
- 3  Student acceptance
- 4  Understanding the new requirements
- 5  Training of staff
- 6  No challenges—SFA already meets the 100 percent whole grain-rich requirements
- 7  Other (*Specify*): \_\_\_\_\_

The next few questions ask about nutrient requirements, purchasing changes, implementation assistance, and the certification process.

**NUTRIENT REQUIREMENTS**

**5.13 What is the biggest challenge for each school type in meeting the calorie requirements for breakfast?**

SCHOOL TYPE	MEETING THE MINIMUM CALORIE REQUIREMENTS	NOT EXCEEDING THE MAXIMUM CALORIE REQUIREMENTS	NO BREAKFAST CALORIE CHALLENGES	N/A – DO NOT SERVE THIS GRADE-LEVEL GROUP
a. Grades K-5 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
b. Grades 6-8 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
c. Grades 9-12 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
d. Other (for example, K-8, K-12, or 6-12) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>

**5.14 What is the biggest challenge for each school type in meeting the calorie requirements for lunch?**

SCHOOL TYPE	MEETING THE MINIMUM CALORIE REQUIREMENTS	NOT EXCEEDING THE MAXIMUM CALORIE REQUIREMENTS	NO LUNCH CALORIE CHALLENGES	N/A – DO NOT SERVE THIS GRADE-LEVEL GROUP
a. Grades K-5 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
b. Grades 6-8 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
c. Grades 9-12 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
d. Other (for example, K-8, K-12, or 6-12) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>

**5.15 Do you currently know the sodium content of your meals?**

- 1  Yes  
 2  No → SKIP TO QUESTION 5.13

**5.15a What is your current average daily sodium content for breakfast and lunch for the 2013-2014 school year?**

SCHOOL TYPE	SODIUM CONTENT AMOUNTS			
	BREAKFAST		LUNCH	
a. Grades K-5 .....	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>
b. Grades 6-8 .....	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>
c. Grades 9-12 .....	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>
d. Other (for example, K-8, K-12, or 6-12) .....	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>	<input type="text"/>   <input type="text"/>   <input type="text"/>   <input type="text"/>   mg	N/A <input type="checkbox"/>

**5.16 What practices do you anticipate implementing in order to reduce your sodium levels to meet the sodium target for 2014-2015?**

**MARK ALL THAT APPLY**

- 1  Limit condiment use
- 2  Discontinue or change some menu options
- 3  Alter recipes
- 4  Purchase lower sodium products
- 5  Order low sodium products from USDA Foods more often
- 6  Decrease portion sizes of some items
- 7  Current sodium levels already meet the 2014-2015 target
- 8  Other (*Specify*): \_\_\_\_\_
- 9  Don't know

**5.17 Has your SFA made any adjustments for groups of students to meet their needs/wants for additional foods?**

- 1  Yes  
 2  No  
 n  N/A – No additional needs/wants for additional foods
- SKIP TO QUESTION 5.19

**5.18 What type of adjustments has your SFA made for groups of students to meet their needs/wants for additional foods? Check the box for each grade level that made the adjustment.**

SELECT ALL THAT APPLY PER ROW

SCHOOL TYPE	INCREASED FRUITS AND VEGETABLES	OFFERED SECOND MILK	OFFERED SECOND MEAL	INCREASED A LA CARTE OFFERINGS	OFFERED OTHER FEDERAL NUTRITION PROGRAMS	OTHER
a. Grades K-5 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
b. Grades 6-8 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
c. Grades 9-12 .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>
d. Other (for example, K-8, K-12, or 6-12) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>

If you marked "other" for any grade group in 5.18, continue to question 5.18a. Otherwise, skip to question 5.19.

**5.18a. What other kinds of adjustments has your SFA made for groups of students to meet their needs/wants for additional foods?**

\_\_\_\_\_

**PURCHASING CHANGES**

**5.19 Have you had difficulty purchasing any of the following vegetable subgroups?**

	YES	NO
a. Dark green vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Red/orange vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Beans/peas (legumes) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Starchy vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**5.20 Which of the following were reasons you had difficulty purchasing vegetables?**

MARK ALL THAT APPLY

- 1  Not enough variety on the market
- 2  Items are too expensive
- 3  Items require too much preparation
- 4  Items are not acceptable to students
- 5  Limited availability of items
- 6  Other (*Specify*): \_\_\_\_\_
- 7  N/A—No difficulty purchasing vegetables

**5.21 Have you changed the types and amounts of USDA Foods you order to meet the updated nutrient requirements and meal patterns?**

- 1  Yes
- 2  No

**IMPLEMENTATION ASSISTANCE**

**5.22 Has your district used the USDA sharing website to assist with menu changes (<http://healthymeals.nal.usda.gov/best-practices>)?**

- 1  Yes
- 2  No
- D  Don't know

**CERTIFICATION PROCESS**

**5.23 Have you been certified to receive the additional reimbursement of 6 cents per lunch?**

1  Yes → SKIP TO QUESTION 6.1

2  No



**5.23a Have you submitted certification materials for the additional 6 cents per lunch reimbursement?**

1  Yes → SKIP TO QUESTION 6.1

2  No

**5.23b Which of the following are reasons why you have not submitted certification materials for the additional 6 cents per lunch reimbursement?**

**MARK ALL THAT APPLY**

1  Limited staff resources

2  Limited technical resources (for example, no computer, Internet access, or software)

3  Difficulties in developing menus to meet the new meal patterns

4  Difficulties fully implementing meal patterns

5  Difficulties meeting calorie or saturated fat requirements

6  Limited product availability to implement meal patterns or meet nutrient requirements

7  Paperwork burden

8  Costs of implementation are too high

9  Not enough training to complete the application process

10  Other (*Specify*): \_\_\_\_\_

## SECTION 6. MEAL PRICES

The next few questions are about the meal prices for school year 2013-2014. For this section, please record your responses separately for elementary schools (i.e., schools composed of any span of grades from kindergarten through 6th grade); middle or junior high schools (i.e., schools that have no grade lower than 6 and no grade higher than 9); or high schools (i.e., schools that have no grade lower than 9 and continue through 12th grade). If any school does not meet the elementary, middle or junior high, or high school definition, please include it in the "other school" column.

**6.1 What prices did you charge for reimbursable full price, reduced price, and adult breakfasts in your school district by school level at the beginning of the 2013-2014 school year?**

If students are not charged for breakfast (for example, schools are operating under Provision 2, Provision 3, or CEP, or another funding source covers the meal costs), breakfast is not served at a school level, or your SFA does not have schools at a level, please check the appropriate box. If applicable, please still report the prices charged for adult breakfasts.

BREAKFAST PRICES	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL
a. Full price breakfast.....	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _
b. Reduced price breakfast.....	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _
c. Breakfast is served at no cost to students at this type of school .	0 <input type="checkbox"/>	0 <input type="checkbox"/>	0 <input type="checkbox"/>	0 <input type="checkbox"/>
d. Adult breakfast.....	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _
e. Do not serve breakfast at this type of school.....	N <input type="checkbox"/>	N <input type="checkbox"/>	N <input type="checkbox"/>	N <input type="checkbox"/>
f. Do not have this type of school	N <input type="checkbox"/>	N <input type="checkbox"/>	N <input type="checkbox"/>	N <input type="checkbox"/>

**6.2 What prices did you charge for reimbursable full price, reduced price, and adult lunches in your school district by school level at the beginning of the 2013-2014 school year?**

If students are not charged for lunch (for example, schools are operating under Provision 2, Provision 3, or CEP, or another funding source covers the meal costs) or your SFA does not have schools at a level, please check the appropriate box. If applicable, please still report the prices charged for adult lunches.

LUNCH PRICES	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL
a. Full price lunch.....	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _
b. Reduced price lunch.....	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _
c. Lunch is served at no cost to students at this type of school.....	0 <input type="checkbox"/>	0 <input type="checkbox"/>	0 <input type="checkbox"/>	0 <input type="checkbox"/>
d. Adult lunch.....	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _	\$  _ .  _ _
e. Do not have this type of school	N <input type="checkbox"/>	N <input type="checkbox"/>	N <input type="checkbox"/>	N <input type="checkbox"/>

**6.3 What did you do for school year 2013-2014 in response to the paid lunch equity provision in the Healthy, Hunger-Free Kids Act of 2010?**

**MARK ALL THAT APPLY**

- 1  Increased paid lunch prices in all schools
- 2  Increased paid lunch prices in some schools
- 3  Paid lunch pricing already complied with new provision
- 4  Added funds from non-Federal sources to the nonprofit school food service account
- 5  Requested or received an exemption from the paid lunch equity requirement from the State
- 6  No action was taken
- 7  Other (*Specify*): \_\_\_\_\_

**6.4 What non-Federal revenue sources were used to mitigate potential price increases in paid meals?**

- n  N/A – Non-Federal revenue sources were not used → SKIP TO QUESTION 6.5

	YES	NO	N/A
a. Per-meal State reimbursement for <i>any</i> paid meals (breakfast, lunch, etc.) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
b. Per-meal reimbursement by local sources for <i>any</i> paid meals .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
c. Funds provided by organizations, such as school-related or community groups, for <i>any</i> paid meals .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
d. State revenue matching funds that exceed the minimum requirement for paid lunches .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
e. Share of direct payments made from school district funds to support meal services attributable to <i>any</i> paid meals (for example, pro rata share of general funds used to support meal service) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
f. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>

**6.5 What was the average weighted price of all paid NSLP lunches charged in your SFA for school year 2013-2014?**

\$ |\_\_|.\_\_\_\_| DOLLARS

**Note: The average weighted lunch price can be calculated using the USDA Paid Lunch Equity (PLE) Tool. The 2013-2014 average weighted price can be found in the SY 13-14 NonFederal Calculator or Price Calculator tabs of the Tool.**

The average weighted price for paid lunches should be based on the monthly number of paid lunches and the paid lunch prices using October 2013 data. An average weighted price is calculated by multiplying the number of paid lunches by the price paid for each lunch, then dividing by the total number of paid lunches in October 2013.

For example, suppose 300 paid lunches were served in October 2013, with \$2.57 paid for 100 lunches and \$2.60 paid for 200 lunches. The average weighted price is calculated as: (100 meals \* \$2.57) + (200 meals \* \$2.60) / (100+200 meals) = \$2.59 per meal.

**6.6 Have you increased a la carte prices between the 2012-2013 and 2013-2014 school years?**

- 1  Yes  
 2  No → SKIP TO QUESTION 7.1

**6.6a What types of a la carte foods had increased prices? On average, how much were prices increased?**

	YES	IF YES, HOW MUCH PRICES INCREASED ON AVERAGE	NO
a. Beverages (water, juice, sports drinks, etc.).....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
b. Milk.....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
c. Frozen desserts (ice cream, popsicles, etc.).....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
d. Baked goods – dessert (cookies, cakes, pastries, etc.)	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
e. Bread/grain products (bagels, pretzels, crackers, etc.)	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
f. Snacks (chips, energy bars, jerky, etc.).....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
g. Candy.....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
h. Prepared entrées (pizza, hamburgers, burritos, etc.) ...	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
i. Prepared non-entrée food (French fries, onion rings, etc.).....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>
j. Reimbursable meal options.....	1 <input type="checkbox"/>	\$  __ . __ __	2 <input type="checkbox"/>



## SECTION 8. FARM TO SCHOOL ACTIVITIES

Farm to School activities generally center around procurement of local or regional foods, and food, agriculture or nutrition-based educational activities including but not limited to:

- Serving local food products in school meals and snacks
- Serving local food products in classrooms (snacks, taste tests, educational tools)
- Conducting educational activities related to local foods, such as farmers in the classroom and culinary education focused on local foods, field trips to farms, farmers' markets or food processing facilities, and educational sessions for parents and community members
- Creating and tending school gardens (growing edible fruits and vegetables)

8.1 Based on the definition above, did your district or any schools in your district participate in Farm to School activities during the 2012-2013 school year?

- 1  Yes
- 2  No, but started activities in 2013-2014 school year
- 3  No, but plan to start activities sometime in the future
- 4  No activities in 2013-2014 school year and no plans for future
- 5  Don't know
- SKIP TO QUESTION 9.1

8.2 To the best of your knowledge, approximately how many schools in your district participated in any Farm to School activities during the 2012-2013 school year?

\_\_\_\_\_| SCHOOLS

8.3 To the best of your knowledge, approximately how many schools in your district had edible school gardens during the 2012-2013 school year?

\_\_\_\_\_| SCHOOLS

8.4 Based on dollar value, please list the top 5 specific food items (for example, apples, chicken drumsticks) your school district purchased locally in 2012-2013.

- 1  Food item #1: \_\_\_\_\_
- 2  Food item #2: \_\_\_\_\_
- 3  Food item #3: \_\_\_\_\_
- 4  Food item #4: \_\_\_\_\_
- 5  Food item #5: \_\_\_\_\_

**8.5 On average, about how frequently did your district's meals or snacks for the 2012-2013 school year include at least one locally sourced food item from the categories below?**

SELECT ONE RESPONSE PER ROW

	DAILY	A FEW TIMES PER WEEK	WEEKLY	A FEW TIMES PER MONTH	MONTHLY	OCCASIONALLY	NEVER
a. Fruit.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
b. Vegetables.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
c. Fluid milk.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
d. Other dairy.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
e. Meat/poultry.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
f. Eggs.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
g. Seafood.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
h. Plant-based protein items such as beans, seeds, or nuts.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
i. Grains and flour.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
j. Bakery products.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
k. Herbs.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>
j. Other (Specify).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>	5 <input type="checkbox"/>	6 <input type="checkbox"/>	7 <input type="checkbox"/>

The following questions ask about what you spent on food and local food in school year 2012-2013. Please give your best approximation.

**8.6 For the 2012-2013 school year, approximately what were your total food costs?**

\$ \_\_\_\_\_ .00 DOLLARS

**8.7 For the 2012-2013 school year, approximately what were your total food costs excluding USDA Foods and DoD Fresh?**

\$ \_\_\_\_\_ .00 DOLLARS

**8.8 For the 2012-2013 school year, about what percent of total food purchases were spent on locally-sourced foods, including fluid milk? *Your best guess is fine.***

\_\_\_\_\_ %

**8.9 For the 2012-2013 school year, about what percent of total food purchases were spent on local foods excluding fluid milk? *Your best guess is fine.***

\_\_\_\_\_ %

**8.10 Compared to the 2013-2014 school year, as a percentage of total food purchases, do you anticipate your 2014-2015 local purchases will:**

- 1  Increase
- 2  Decrease
- 3  Stay the same

## SECTION 9. FOOD SAFETY

### 9.1 In which of the following locations are foods served to students?

**MARK ALL THAT APPLY**

- 1  Cafeteria or other indoor/outdoor food service area
- 2  School buses
- 3  Classrooms
- 4  Outdoors (other than a food service area)
- 5  Grab and go
- 6  Kiosks
- 7  Vending machines
- 8  School stores
- 9  Field trips
- 10  Mobile food trucks
- 11  Other (*Specify*): \_\_\_\_\_

### 9.2 In addition to school nutrition staff, who serves food to students?

**MARK ALL THAT APPLY**

- 1  Teachers
- 2  Classroom aides
- 3  Parent volunteers
- 4  Bus drivers
- 5  Other (*Specify*): \_\_\_\_\_
- 6  None of these

### 9.3 Outside groups include those that are not part of the school nutrition program. They may include groups associated with the school (for example, parent/teacher associations or organizations, student organizations, or booster clubs).

**Are outside groups permitted to use any kitchens in your SFA without oversight from school nutrition staff?**

- 1  Yes
- 2  No
- 3  N/A—SFA does not have any kitchens

### 9.4 Does your SFA have a policy for school nutrition employees that address health and hygiene?

- 1  Yes
- 2  No → SKIP TO QUESTION 9.6

**9.5 When are employees with symptoms of vomiting or diarrhea allowed to return to work?**

MARK ALL THAT APPLY

- 1  When they are symptom-free for at least 24 hours
- 2  With approval from a doctor
- 3  Other (Specify): \_\_\_\_\_
- 4  Policy does not address when employees may return to work

**9.6 Are full-time or part-time school nutrition employees offered paid sick leave? Please use your SFA's own definition of "full-time" or "part-time" to answer this question.**

	YES	NO
a. Full-time school nutrition employees.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Part-time school nutrition employees.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**9.7 Since school year 2010-2011, have any schools in your SFA been investigated as part of a foodborne illness outbreak?**

- 1  Yes
- 2  No → SKIP TO QUESTION 10.1

**9.7a What was the source of the outbreak? If your SFA has been investigated in more than one outbreak, please indicate the source(s) identified in all investigations.**

MARK ALL THAT APPLY

- 1  School meals program
- 2  Food from home
- 3  A fundraising event
- 4  A sporting event
- 5  An event catered by a restaurant
- 6  Other (Specify): \_\_\_\_\_
- 7  Source was not determined

**SECTION 10. SMARTER LUNCHROOMS**

**10.1 Smarter Lunchrooms use simple, low-cost and no-cost changes to the lunchroom environment to get students to take and eat more healthy foods. Examples of Smarter Lunchrooms strategies include relocating fruit to a more eye-catching location, renaming vegetables with appealing names, and prompting students to select and enjoy healthy foods. Are you aware of the Smarter Lunchrooms Movement?**

- 1  Yes  
 2  No → SKIP TO QUESTION 10.3

**10.2 Have you or any of the school nutrition staff in your district ever received training on Smarter Lunchrooms strategies?**

- 1  Yes  
 2  No → SKIP TO QUESTION 10.3

**10.2a Which of the following types of Smarter Lunchrooms training have you or school nutrition staff received?**

	YES	NO
a. Creating Smarter Lunchrooms Online Course .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Smarter Lunchrooms Movement Symposium .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Smarter Lunchrooms workshop offered by the State .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Team Nutrition workshop or webinar on Smarter Lunchrooms ....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**10.3 For each of the following strategies (Smarter Lunchrooms strategies), approximately how many schools used the strategy during the 2013-2014 school year?**

	NONE	SOME	ALL	N/A – NO SCHOOLS IN SFA HAVE THIS FEATURE
<b>Strategies to encourage fruit consumption</b>				
a. Use additional signs or verbal prompts to draw attention to fruit and encourage students to take some.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
b. Display fruit in two or more locations .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
c. Display the whole fruit.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
d. Use attractive bowls to display fruit rather than stainless steel pans.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
e. Display fruit near the register .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
<b>Strategies to encourage vegetable consumption</b>				
f. Offer choice of vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
g. Give vegetables creative names.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
h. Create a student committee responsible for the naming of and creating signage for vegetables .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
i. Display creative names for vegetables on a poster or menu board outside the cafeteria .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
j. Offer a salad/salad bar.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
k. Move salad bar away from wall, in front of cash register .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
l. Require or encourage the use of cafeteria trays .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
<b>Strategies to encourage consumption of the healthy entrée</b>				
m. Display creative names for targeted entrées near entrées on the serving line.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
n. Display creative names of targeted entrées on a poster or menu board outside the cafeteria .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
o. Make the entrée with the greatest nutrient density the first or most prominent on the line .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	

	NONE	SOME	ALL	N/A – NO SCHOOLS IN SFA HAVE THIS FEATURE
<b>Strategies to encourage consumption of white/plain milk</b>				
p. Display white milk in all milk coolers .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
q. Have white milk as at least one-third of drinks displayed in each cooler.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
r. Place white milk in front of or before flavored milk/other sugar-added beverages.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
<b>Strategies to encourage consumption of a reimbursable meal</b>				
s. Create a healthy-items-only convenience line or window stocked with: milk, fruits, vegetables, premade sandwiches or salads, and lowest-fat/lowest-sodium entrée items .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	5 <input type="checkbox"/>
t. Move all "competitive foods" (chips, cookies, etc.) behind the serving counter in the regular lunch line .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	5 <input type="checkbox"/>
u. Make all "competitive foods" in the regular lunch line available by request only .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	5 <input type="checkbox"/>
v. Place the components of a reimbursable meal or a reimbursable "grab-and-go" bag at the snack window .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	5 <input type="checkbox"/>
w. Keep ice cream in a freezer with an opaque rather than clear top .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	5 <input type="checkbox"/>
<b>Other Smarter Lunchroom Strategies</b>				
x. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	
y. Other ( <i>Specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	

**10.4** For the 2012-2013 and 2013-2014 school years, approximately how many schools in your district used at least one Smarter Lunchroom strategy? *Your best guess is fine.*

SCHOOL YEAR	ELEMENTARY SCHOOL	MIDDLE OR JUNIOR HIGH	HIGH SCHOOL	OTHER SCHOOL
a. SY 2012-2013 .....	_ _ _	_ _ _	_ _ _	_ _ _
b. SY 2013-2014 .....	_ _ _	_ _ _	_ _ _	_ _ _

**END TIME:** \_\_\_\_:\_\_\_\_

**Thank you for your participation in this important study.**

Appendix B State Director Survey SY 2013–14

## Special Nutrition Program Operations Study

# SN-OPS

**State Child Nutrition Director**  
Survey SY 2013-14

**This copy for reference purposes only.  
Please record all responses at:**

**<http://www.cndirectorsurveyyear3.com/>**

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-0562. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering the data needed, and completing and reviewing the information collection.



U.S. Department of Agriculture  
Food and Nutrition Service

This survey is being conducted for the Food and Nutrition Service, U.S. Department of Agriculture as part of a study of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other USDA food programs throughout the country. All responses will be kept private; no names will be used in our reports, and only aggregated results will be reported.

Section 305 of the Healthy, Hunger-Free Kids Act of 2010 States that "States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts."

Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to:

U.S. Department of Agriculture  
Food and Nutrition Service  
Office of Policy Support  
Alexandria, VA 22302  
Attn: Dr. Allison Magness

**We thank you for your cooperation and participation in this very important study.**

## INSTRUCTIONS

Please answer all questions. Unless you see the words CHECK ALL THAT APPLY after a question, please check only one answer for each question.

If you have any questions about the study or about completing this survey, please email [CNSurveyHelp@2mresearchservices.com](mailto:CNSurveyHelp@2mresearchservices.com) or call 1-866-465-7738 (toll-free).

Date: |\_|\_|/|\_|\_|/|\_|\_|\_|\_|  
Month Day Year

### Contact information for the Child Nutrition Director:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Phone Number: |\_|\_|\_|-|\_|\_|-|\_|\_|\_|\_|\_|\_|\_|\_|  
Area Code Number Extension

Email Address: \_\_\_\_\_

### Name and address of person filling out this survey (if other than the Child Nutrition Director):

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City, State, Zip Code: \_\_\_\_\_

Phone Number: |\_|\_|\_|-|\_|\_|-|\_|\_|\_|\_|\_|\_|\_|\_|  
Area Code Number Extension

Email Address: \_\_\_\_\_

## SECTION A. ADMINISTRATIVE REVIEW PROCESS

This first section is about the Administrative Review process, including program reviews, fiscal action, and certification and benefit issuance. Please answer questions in this section for what has been conducted as of June 1, 2014 and what is planned for the rest of 2013-2014 school year.

**A1. During the 2013-2014 school year, State Agencies have the option of either adopting the new Administrative Review process in its entirety, or continuing with the Coordinated Review Effort (CRE) process plus a weighted nutrient analysis.**

**Did your State Agency adopt the new Administrative Review Process for the 2013-2014 school year?**

1  Yes

2  No → SKIP TO QUESTION B1

**A2. For the 2013-2014 school year, how many targeted menu reviews using Option 1 (complete Dietary Specifications Assessment Tool) did your State conduct as of June 1, and approximately how many are planned for the rest of the school year? How many nutrient analyses were performed by State Agency staff, and how many are planned for the rest of the school year?**

	OPTION 1 TOTAL	NUTRIENT ANALYSES BY STATE AGENCY STAFF
a. Number of Option 1 targeted menu reviews conducted as of June 1, 2014 .....	_ , _ _ _	_ , _ _ _
b. Number of Option 1 targeted menu reviews planned for the rest of the school year.....	_ , _ _ _	_ , _ _ _

**A2a. Of the nutrient analyses conducted by State Agency staff as of June 1, 2014, how many reviews showed noncompliance?**

|\_|,|\_|\_|\_| REVIEWS

**A3. For the 2013-2014 school year, how many targeted menu reviews using Option 2 (validate existing nutrient analysis performed by school food authority or contractor) did your State conduct as of June 1, and approximately how many are planned for the rest of the school year? How many nutrient analyses were successfully validated by State Agency staff (that is, verified as correct)?**

	OPTION 2 TOTAL	SUCCESSFULLY VALIDATED
a. Number of Option 2 targeted menu reviews conducted as of June 1, 2014 .....	_ , _ _ _	_ , _ _ _
b. Number of Option 2 targeted menu reviews planned for the rest of the school year.....	_ , _ _ _	

**A4. For the 2013-2014 school year, how many targeted menu reviews using Option 3 (State Agency conducts nutrient analysis) did your State conduct as of June 1, and approximately how many are planned for the rest of the school year? How many nutrient analyses were performed by State Agency staff, and how many are planned for the rest of the school year?**

	OPTION 3 TOTAL	NUTRIENT ANALYSES BY STATE AGENCY STAFF
a. Number of Option 3 targeted menu reviews conducted as of June 1, 2014.....	_ , _ _ _ _	_ , _ _ _ _
b. Number of Option 3 targeted menu reviews planned for the rest of the school year.....	_ , _ _ _ _	_ , _ _ _ _

**A5. The Resource Management Comprehensive Review focuses on ensuring school food authorities (SFAs) are maintaining and using nonprofit school food service accounts in accordance with regulatory requirements and ensuring that related costs are necessary, reasonable, and allowable.**

**For the 2013-2014 school year, how many SFAs in your State received a Resource Management Comprehensive Review as of June 1, and approximately how many are planned to receive one for the rest of the school year? How many Resource Management Comprehensive Reviews were conducted due to failure to complete the Resource Management Risk Indicator tool at least four weeks prior to the on-site portion of the administrative review? *The failure to complete the Resource Management Risk Indicator Tool may be due to either the SFA or the State Agency.***

	RESOURCE MANAGEMENT COMPREHENSIVE REVIEW TOTAL	CONDUCTED DUE TO FAILURE TO COMPLETE RESOURCE MANAGEMENT RISK INDICATOR TOOL
a. Number of SFAs receiving a Resource Management Comprehensive Review as of June 1, 2014.....	_ , _ _ _ _	_ , _ _ _ _
b. Number of SFAs planned to receive a Resource Management Comprehensive Review for the rest of the school year.....	_ , _ _ _ _	

The next question is about Special Provision Options (SPOs). SPOs include:

- Provision 1—Reducing certification to once every two years
- Provision 2—Reducing certification to once every four years and claiming based on derived percentages
- Provision 3—Reducing certification to once every four years and claiming based on prior funding levels
- Community Eligibility Provision—Eliminating household applications in high poverty local educational agencies and schools and claiming based on derived percentages

A6. An abbreviated SPO review is conducted if the school selection procedures do not result in the review of an SPO in a non-base year.

For the 2013-2014 school year, how many abbreviated Special Provision Option (SPO) reviews were conducted as of June 1, and approximately how many are planned for the rest of the school year?

SPO REVIEW TOTAL	
a. Number of SPO reviews conducted as of June 1, 2014.....	_ _ , _ _ _ _ _
b. Number of SPO reviews planned for the rest of the year .....	_ _ , _ _ _ _ _

A7. If a school selected for an Administrative Review operates the NSLP Afterschool Snack Program (ASP), a review of the program should be conducted. This review is intended to ensure that participating schools serve students nutritionally-balanced snacks, provide appropriate activities, and count and claim snacks accurately.

For the 2013-2014 school year, how many...

TOTAL NUMBER	
a. Schools selected for an Administrative review operate the ASP?.....	_ _ , _ _ _ _ _
b. On-site reviews for the ASP were conducted as of June 1, 2014?.....	_ _ , _ _ _ _ _
c. On-site reviews for the ASP are planned for the rest of the year? .....	_ _ , _ _ _ _ _

The next few questions are about fiscal action (FA). FA is the recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid Claims for Reimbursement, submission of a revised Claim for Reimbursement, and correction of records to ensure that unfiled Claims for Reimbursement are corrected when filed (7 CFR 210.19(c)).

A8. As of June 1, 2014, what was the total dollar amount of the fiscal action your State Agency assessed in the 2013-2014 school year for the NSLP and the SBP? *Include only fiscal action above the States' disregard for reviews that have been completed (or closed).*

FISCAL ACTION TOTAL	
a. Total dollar amount assessed for the NSLP .....	\$ _ _ _ _ , _ _ _ _ .00
b. Total dollar amount assessed for the SBP.....	\$ _ _ _ _ , _ _ _ _ .00

**A9. A State Agency may disregard an overclaim if the overclaim does not exceed \$600 per program. Some States may have a disregard of overclaim that is less than \$600.**

**Does your State have a disregard of overclaim that is less than \$600?**

- 1  Yes
- 2  No → SKIP TO QUESTION A10

**A9a. What is the amount of the disregard of overclaim in your State?**

\$|\_|\_|\_|\_|\_|\_|\_|\_|\_|\_|.00 DOLLARS

**A10. As of June 1, 2014, how many reviews in the 2013-2014 school year that had fiscal action used the disregard of overclaim?**

|\_|\_|\_|\_|\_|\_|\_| REVIEWS

**A11. Out of the completed (or closed) reviews as of June 1, 2014, did any SFAs in your State appeal the findings from the new Administrative Review process for the 2013-2014 school year?**

- 1  Yes
- 2  No → SKIP TO QUESTION A12

**A11a. How many SFAs have appealed findings from the new Administrative Review process as of June 1? How many of the SFAs that appealed findings from the new Administrative Review process had findings resulting in fiscal action?**

	APPEALED FINDINGS	FINDINGS RESULTING IN FISCAL ACTION
a. Number of SFAs.....	_ _ _ _ _ _ _	_ _ _ _ _ _ _

**A12. The Meal Access and Reimbursement (Performance Standard 1) portion of the review is designed to ensure that all free, reduced price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced price, and paid meals, respectively, and are counted, recorded, consolidated and reported through a system that consistently yields correct claims.**

**Compared to school year 2012-2013 (or 2011-2012 if your State opted to postpone reviews in 2012-2013), has the number of your State's Meal Access and Reimbursement (Performance Standard 1) findings increased or decreased using the new Administrative Review process?**

- 1  Increased
- 2  Decreased
- 3  No change

**A13. Part of the Meal Pattern and Nutritional Quality (Performance Standard 2) portion of the review is designed to establish that meals claimed for reimbursement meet dietary specifications requirements for calories, saturated fat, and trans fat. Reimbursable breakfasts and lunches claimed for reimbursement must meet the requirements as applicable to the age/grade group being reviewed within all reimbursable meal service lines.**

**In your view, does the risk-based approach for evaluating the dietary specifications improve the new Administrative Review process compared to the previous process?**

- 1  Yes
- 2  No

**A14. The Resource Management portion of the review is a systematic approach to ensuring the overall financial health of an SFA's nonprofit school food service. It consists of a review of the areas integral to the financial health of the SFA's school food service.**

**In your view, do the resource management components of the review improve the new Administrative Review process compared to the previous process?**

<sup>1</sup>  Yes

<sup>2</sup>  No

**A15. In your view, why does the risk-based approach for evaluating dietary specifications or the resource management components of the review improve or not improve the new process?**

---



---



---

**A16. When selecting students' certification and benefit issuance documentation for review, the State Agency can elect to review either all free and reduced-price students or a statistically valid sample of all free and reduced-price students for all schools in the SFA. A statically valid sample of students can be chosen for a confidence level of 95 or 99 percent.**

**For the 2013-2014 school year, how many SFA reviews of each type were conducted as of June 1? Approximately how many are planned for the rest of the school year?**

	CONDUCTED AS OF JUNE 1, 2014	PLANNED FOR REST OF SCHOOL YEAR
a. All free and reduced-price students .....	_ _ _ _ _ _ _	_ _ _ _ _ _ _
b. Sampling method at the 95% confidence level.....	_ _ _ _ _ _ _	_ _ _ _ _ _ _
c. Sampling method at the 99% confidence level.....	_ _ _ _ _ _ _	_ _ _ _ _ _ _

**A17. Compared to the previous process, is the new Administrative Review process more or less...**

SELECT ONE RESPONSE PER ROW

	MUCH MORE	SOMEWHAT MORE	ABOUT THE SAME	SOMEWHAT LESS	MUCH LESS
a. Time consuming to complete a review? .....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
b. Time consuming to complete the review of the meal pattern and nutritional quality of menus?.....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
c. Accurate for findings in the following review areas:					
1. Meal Access and Reimbursement (Critical Area – Performance Standard 1)?.....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
2. Meal Pattern and Nutritional Quality (Critical Area – Performance Standard 2)? .....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
3. Resource Management (General Areas)? .....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
4. General Program Compliance (General Areas)? .....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>
5. Other Federal Program Reviews (Critical and General Areas)? .....	0 <input type="checkbox"/>	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>	4 <input type="checkbox"/>

**A18. What is the most important recommendation that would help USDA improve the new Administrative Review process?**

---



---



---

**SECTION B. RESOURCES AND FINANCES**

The following questions are about resources and finances, including funding that your State provides to SFAs, Federal funding used for State administrative purposes, and State staffing.

**B1. Does your State provide a subsidy for breakfasts or lunches to SFAs? If yes, how is the subsidy provided, and what was the total amount of subsidies given to all SFAs in your State during school year 2012-2013?**

MEAL	B1a. DOES YOUR STATE PROVIDE A SUBSIDY?	MARK ONE PER MEAL B1b. IF YES, HOW IS THE SUBSIDY PROVIDED?	B1c. WHAT WAS THE TOTAL AMOUNT OF THESE SUBSIDIES GIVEN TO ALL SFAS DURING 2012-2013?
	a. Breakfast.....	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No	1 <input type="checkbox"/> Per-meal reimbursement 2 <input type="checkbox"/> Annual lump sum 3 <input type="checkbox"/> Supplement to cover specific costs 4 <input type="checkbox"/> Based on a percentage of low-income students 5 <input type="checkbox"/> Other ( <i>specify</i> ): _____
b. Lunch.....	1 <input type="checkbox"/> Yes 2 <input type="checkbox"/> No	1 <input type="checkbox"/> Per-meal reimbursement 2 <input type="checkbox"/> Annual lump sum 3 <input type="checkbox"/> Supplement to cover specific costs 4 <input type="checkbox"/> Based on a percentage of low-income students 5 <input type="checkbox"/> Other ( <i>specify</i> ): _____	\$ _ _ , _ _ _ _ , _ _ _ _ .00

**B2. Does your State provide financial or personnel support for any of the following school food service operations at the SFA level?**

	YES	NO
a. Reimbursable meal preparation (including food purchase and labor) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Non-reimbursable meal preparation .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Equipment .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Preparing claims .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Storage .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Contracted services .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
g. Overhead/indirect costs .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
h. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**B3. How many full-time equivalent (FTE) State Agency staff are responsible for conducting monitoring of school meal operations?**

\_\_\_\_ NUMBER OF FTE STATE STAFF

**B4. How adequate is this staffing for monitoring program operations?**

- 1  Adequate
- 2  Somewhat adequate
- 3  Not adequate

**B5. Has your State been able to fully use your 2012-2013 State Administrative Expense (SAE) funds?**

- 1  Yes
- 2  No

**B6. Did your State use any of the SAE funds to improve the operation of the USDA Foods program?**

- 1  Yes
- 2  No → SKIP TO QUESTION B7

**B6a. How were SAE funds used to improve the operation of the USDA Foods program?**

MARK ALL THAT APPLY

- 1  USDA Foods storage
- 2  USDA Foods distribution
- 3  Staff skills to administer USDA Foods (for example, training)
- 4  Salaries or fringe benefits for staff administering USDA Foods
- 5  Other (*specify*): \_\_\_\_\_

**B7. Did your State request SAE funding reallocation for the past school year (that is, 2012-2013)?**

1  Yes → SKIP TO QUESTION B8

2  No



**B7a. What was the primary reason your State did not request funding reallocation?**

**MARK ONE ONLY**

1  Did not have eligible projects or activities to fund

2  Would have been unable to expend reallocated funds in the specified time limit

3  Requesting reallocated funds would exceed the 20 percent carryover limitation

4  Alternate funding sources were available

5  Reallocation request process was too burdensome

6  Reallocation reporting process was too burdensome

7  Other (*specify*): \_\_\_\_\_

**B8. Were any of the following challenges to your State's ability to fully use all Federal funds?**

	YES	NO
a. Union agreements.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. State policy.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. State legislation.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Governor's mandates.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**B9. Did any of the following actions affect your State's ability to fully use Federal funds?**

	YES	NO
a. Hiring freezes .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Work furloughs .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Travel restrictions .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Work shutdowns .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**B10. Is your State currently using contracted staff for any of the following functions?**

	YES	NO	DON'T KNOW
a. Monitoring .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	D <input type="checkbox"/>
b. Technical assistance .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	D <input type="checkbox"/>
c. Claims processing .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	D <input type="checkbox"/>
d. Nutrition education .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	D <input type="checkbox"/>
e. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	D <input type="checkbox"/>
_____			



**C3c. For purposes of school food operations, how many of these charter schools are considered to be separate SFAs or part of a larger SFA?**

CHARTER SCHOOLS

- a. A separate SFA.....
- b. Part of a larger SFA .....

NUMBER OF SCHOOLS	
_ _ _ _	_ _ _ _
_ _ _ _	_ _ _ _

The next few questions are about the USDA Foods program and how it operates in your State.

**C4. Does the State allow SFAs to order from the full list of USDA Foods?**

- 1  Yes → SKIP TO QUESTION C5
- 2  No

**C4a. How does the State obtain feedback from SFAs regarding which USDA Foods to offer?**

	YES	NO
a. Survey all SFA directors.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Utilize advisory council consisting of SFA directors.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Obtain feedback from SFA directors at annual State distribution meetings.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Other ( <i>specify</i> ).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**C5. How do SFAs submit their requests for specific quantities of USDA Foods?**

	YES	NO
a. Web based supply chain management system food requisition (WBSCM).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. SDA food ordering system.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. SDA ordering that allocates products to SFAs.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Other ( <i>specify</i> ).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**C6. How often can SFAs order USDA Foods?**

- 1  Once a year
- 2  Twice a year
- 3  More than twice a year

**C7. How does the State reallocate unused entitlement funds at the end of the school year?**

- 1  Reallocate to all SFAs based on percentage of total meals
- 2  Reallocate to SFAs by request
- 3  No reallocation or carry forward into the next school year
- 4  Other (*specify*): \_\_\_\_\_

The following questions are about food service management companies (FSMCs), cooperative agreements, and other procurement practices.

**C8. In your State, how many SFAs and schools are using each of the following kinds of FSMCs?**

	SFAs	SCHOOLS
a. Total number using national companies .....	_ _ , _ _ _ _	_ _ , _ _ _ _
1. Aramark.....	_ _ , _ _ _ _	_ _ , _ _ _ _
2. Chartwells .....	_ _ , _ _ _ _	_ _ , _ _ _ _
3. Preferred Meal Systems .....	_ _ , _ _ _ _	_ _ , _ _ _ _
4. Sodexo.....	_ _ , _ _ _ _	_ _ , _ _ _ _
5. Other national companies.....	_ _ , _ _ _ _	_ _ , _ _ _ _
b. Number using regional companies (i.e., within multi-state area)....	_ _ , _ _ _ _	_ _ , _ _ _ _
c. Number using local companies.....	_ _ , _ _ _ _	_ _ , _ _ _ _
d. Total number using FSMCs .....	_ _ , _ _ _ _	_ _ , _ _ _ _

**C9. Prior to their execution, does your State review SFA cooperative purchasing agreements, group purchasing organization (GPO) contracts, or FSMC contracts?**

- 1  Yes, all are reviewed → SKIP TO QUESTION C10
- 2  Yes, some but not all are reviewed
- 3  No, none are reviewed → SKIP TO QUESTION C10

**C9a. Under which circumstances does your State review SFA cooperative purchasing agreements, GPO contracts, or FSMC contracts prior to their execution?**

	MARK ALL THAT APPLY PER COLUMN	
	COOPERATIVE PURCHASING AGREEMENTS AND GPO CONTRACTS	FSMC CONTRACTS
a. Dollar value of contract .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Length of contract term.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. New vendor.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Potential co-op size.....	1 <input type="checkbox"/>	
e. SFA history.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Other ( <i>specify</i> ).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**C10. Does your State have a prototype procurement document or model contract that SFAs may use for cooperative purchasing, GPOs, or FSMC contracts?**

- 1  Yes, and use is required under all circumstances → SKIP TO QUESTION D1
- 2  Yes, and use is required under some circumstances
- 3  Yes, but use is not required → SKIP TO QUESTION D1
- 0  No → SKIP TO QUESTION D1

**C10a. Under which circumstances are SFAs required to use the prototype procurement document or model contract?**

MARK ALL THAT APPLY  
PER COLUMN

	COOPERATIVE PURCHASING AGREEMENTS AND GPO CONTRACTS	FSMC CONTRACTS
a. Dollar value of contract .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Length of contract term .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. New vendor .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Potential co-op size .....	1 <input type="checkbox"/>	
e. SFA history .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**SECTION D. STATE DATA SYSTEMS**

The following questions are about the use of computer-based reporting systems and software used to conduct nutrient analysis of menus.

**D1. Does your State have a standardized, computer-based reporting system that is used by all or some SFAs to submit claims data and/or other reporting information on the school meal programs to the State?**

- 1  Yes, all SFAs use the system
- 2  Yes, some but not all SFAs use the system
- 3  No → SKIP TO QUESTION D12

**D2. Is the standardized, computer-based system linked to any of the following Child Nutrition Programs?**

	YES	NO
a. Afterschool Snack Program .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Child and Adult Care Food Program .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Food Distribution .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Seamless Summer Option .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Special Milk Program .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Summer Food Service Program.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
g. Other ( <i>specify</i> )..... _____	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**D3. What functions are provided by the standardized, computer-based system?**

	YES	NO
a. Administrative Reviews .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Applications processing .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Certification processing .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Direct certification matching or reporting .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Financial services .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Food safety records or training .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
g. Generating USDA reports .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
h. Managing FSMCs or cooperative purchasing agreements.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
i. Meal counting .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
j. Meal claiming .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
k. Menu planning .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
l. Program renewal .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
m. Running monitoring reports or queries .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
n. Verification activities .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
o. Wellness policy reporting .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
p. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**D4. What year was your data system first implemented?**

\_\_\_\_ YEAR

**D5. What type of site-level information is contained in the standardized, computer-based system?**

	YES	NO
a. Certification status (for example, free or reduced price meals) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Claiming .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. Basis of eligibility (for example, income, categorical, or direct certification) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Other ( <i>specify</i> ) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		

**D6. How is this system linked to SFAs, schools, or other sites?**

MARK ALL THAT APPLY PER COLUMN

	SFAS	SCHOOLS	OTHER SITES
a. Online (automatic uploading or sharing of files).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
b. Web-based site (data uploaded through a web interface or FTP site) .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
c. Data sent through encrypted email .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
d. Data sent through unencrypted email .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
e. Manual re-keying of data into system .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>
f. Other ( <i>specify</i> )..... _____	1 <input type="checkbox"/>	2 <input type="checkbox"/>	3 <input type="checkbox"/>

**D7. Who developed your State’s standardized, computer-based reporting system? Who currently manages the system?**

MARK ALL THAT APPLY PER COLUMN

	DEVELOPED SYSTEM	MANAGES SYSTEM
a. Vendor or contractor .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. State child nutrition information technology (IT) staff.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. State IT staff from agencies other than child nutrition .....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. Other, non-IT State staff.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other ( <i>specify</i> )..... _____	1 <input type="checkbox"/>	2 <input type="checkbox"/>

If a vendor or contractor developed the system, please continue to question D7a. Otherwise, skip to question D8.

**D7a. What is the name of the vendor or contractor company that developed the system? Please list all companies if more than one was involved.**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**D8. What was the primary funding source used for developing your State's standardized, computer-based reporting system? What is the primary funding source used to maintain the system?**

MARK ONE  
RESPONSE PER COLUMN

	DEVELOP SYSTEM	MAINTAIN SYSTEM
a. Federal grant.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
b. Other grant.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
c. State Administrative Expense funds.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
d. State Child Nutrition operating funds.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
e. Other State funds.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
f. Other ( <i>specify</i> ).....	1 <input type="checkbox"/>	2 <input type="checkbox"/>
_____		
g. No funds required.....	1 <input type="checkbox"/>	2 <input type="checkbox"/>

**D9. How satisfied are you with your State's standardized computer-based reporting system?**

- 1  Very satisfied
- 2  Satisfied
- 3  Dissatisfied
- 4  Very dissatisfied

**D10. Does your standardized computer-based reporting system enable you to upload required data on school meal programs to USDA's Food Programs Reporting System (FPRS)?**

- 1  Yes
- 2  No → SKIP TO QUESTION D11

**D10a. How satisfied are you with the computer based link with USDA's FPRS?**

- 1  Very satisfied
- 2  Satisfied
- 3  Dissatisfied
- 4  Very dissatisfied

**D11. How are the data for FPRS reports generated?**

MARK ALL THAT APPLY

- 1  Sites send data and State aggregates it
- 2  SFAs aggregate site data and send it to State
- 3  SFAs send site data and State aggregates it
- 4  Other (*specify*): \_\_\_\_\_

**D12. Which software system does your State Agency use to conduct nutrient analysis of menus?**

**MARK ALL THAT APPLY**

- 1  CookenPro Commercial
- 2  Eatec Solutions by Agilsys
- 3  eTritition
- 4  KidServe
- 5  Meal Magic Suite – Nutrition Magic (formerly Meal Magic .Net Suite)
- 6  Meals Plus Menus
- 7  Menus & Inventory (Planning\Production) (part of MSchoolTools; formerly WinFSIM)
- 8  NUTRIKIDS: Menu Planning & Nutritional Analysis
- 9  OneSource
- 10  PrimeroEdge – Menu Planning Module
- 11  TrakNOW – Nutrition and Inventory
- 12  Visual B.O.S.S.
- 13  WebSMARTT 3
- 14  Webtrition
- 15  Custom-developed system
- 16  Other (*specify*): \_\_\_\_\_

**Thank you for your participation in this important study.**

## Appendix C School Food Authority Sample and Sample Weights

## C.1 Overview

The Special Nutrition Program Operations Study (SN-OPS), School Year (SY) 2013–14 was the final year of SN-OPS. Data were collected from State Child Nutrition (CN) Directors and a nationally representative sample of School Food Authority (SFA) Directors for School Year (SY) 2013–14. This appendix contains information for analyzing the data collected from the SY 2013–14 SFA Director Survey. The SFA Director Survey was administered to a complex random sample of SFAs that participated in the National School Lunch Program (NSLP) and/or the School Breakfast Program (SBP) and appeared on the Verification Summary Report (VSR) Form 742 data file for SY 2011–12.<sup>1</sup> There were 19,014 SFAs that operated a NSLP and/or SBP in the file, of which 15,126 were coded as “public,” which means that they served public schools as defined by the U.S. Department of Education. The remaining 3,888 cases, coded as “private,” were not considered as candidates for the SFA Director Survey. The SY 2013–14 sample ( $n=1,881$ ) was drawn to represent the 15,126 public SFAs (the sampling frame), meaning that the sample unit is an SFA.

Understanding the sample design for SN-OPS, SY 2013–14 requires an understanding of the sample designs in used in the previous two years; i.e., for SY 2011–12 and SY 2012–13. SN-OPS, SY 2011–12 defined the sampling frame using the public SFAs in the VSR data file for SY 2009–10 and collected data during SY 2011–12. On the VSR 2009–10, there were 14,799 public SFAs and 3,835 private SFAs.<sup>2</sup> The SN-OPS, SY 2010–11 researchers designed a complex (stratified) random sample based on categorizations of SFAs according to number of students (seven categories—referred to as *sfasize*), the location of the SFA in terms of Food and Nutrition Service (FNS) Region (seven categories—referred to as *region*), and the percentage of students qualifying for free and/or reduced-price lunch (three categories—referred to as *sfapov*). The 26 SFAs in the largest size category (with number of students  $\geq 100,000$ ) were all included in the sample and are referred to as “certainty units,” since their probability of inclusion in the sample is one. The remaining units in the sampling frame were organized into 126 cells or strata (6 size categories  $\times$  7 region categories  $\times$  3 poverty categories), ordered by *sfasize*, *sfapov*, and then *region*, and then labeled from 1 to 126. For example, stratum number 1 contains the SFAs in the lowest size category, the lowest poverty category, and the Northwest Region,<sup>3</sup> while stratum number 2 contains the SFAs in the lowest size category, the lowest poverty category, and the Mid-Atlantic Region, and so on. The strata were then sampled systematically to achieve the desired sample size.

In **systematic sampling**, the units are sampled following a set method (e.g., every 20th unit in the stratum) to ensure representation across the strata. In this case, the design required that the sampling rate vary by *sfasize* such that the probability of being selected was proportional to the average square

---

<sup>1</sup> See USDA. N.D. “School Food Authority Verification Summary Report.” Accessed September 30, 2015. [http://www.fns.usda.gov/sites/default/files/SFA\\_Verification\\_Summary.pdf](http://www.fns.usda.gov/sites/default/files/SFA_Verification_Summary.pdf).

<sup>2</sup> Two of the public SFAs were found to be duplicates, reducing the number to 14,798.

<sup>3</sup> See Appendix C in USDA. 2014. “Special Nutrition Program Operations Study: State and School Food Authority Policies and Practices for School Meals Programs School Year 2011–12.” Published March 20. <http://www.fns.usda.gov/special-nutrition-program-operations-study-state-and-school-food-authority-policies-and-practices>.

root of the total enrollments for the SFAs by size category. Therefore, every stratum with the same *sfasize* will have the same sampling rate.

After sampling, the sample size was 1,768. Assuming a response rate of at least 85 percent, the post-response sample size would be 1,500, which is sufficient for estimates of proportions with precision of at least +/-5 percent at the 95 percent level of confidence for the overall SFA population, for the size of strata defined above, and for measures that are highly correlated with SFA size. As discussed in more detail below, there were two SFAs in the sample that represented in total eight school districts. The SFAs could not provide aggregate responses for all of their districts, so the researchers conducting SN-OPS, SY 2010–11 decided to treat these as separate SFAs, bringing the total number of sample units to 1,774. In SN-OPS, SY 2011–12, determining the probability that a particular unit was selected for the sample depended on its classification in terms of *sfasize*.

For SN-OPS, SY 2012–13, the researchers decided to increase the sample size to 1,882 to compensate for the expectation that the response rate would be approximately 80 percent instead of the assumption in SN-OPS, SY 2011–12 of 85 percent. With the lower response rate and larger sample size, the survey would again be expected to generate a post-response sample size of approximately 1,500. The extra units were added by sampling from the SY 2011–12 VSR data file. It is important to understand that 1,754 of the units sampled in SN-OPS, SY 2011–12 carried over to the SN-OPS, SY 2012–13 sample. These 1,754 SFAs continued to exist in the VSR 2011–12. In other words, 20 of the units sampled in SN-OPS, SY 2011–12 were found to be ineligible for the SN-OPS, SY 2012–13 sample because they did not exist in the VSR 2011–12 data file.<sup>4</sup> To get to the desired sample size, 128 units were added by sampling from the public SFAs listed in the VSR 2011–12 data file after deleting the carry-over units to avoid selecting an SFA that already was included in the sample. In effect, the SN-OPS, SY 2012–13 sampling frame became VSR 2011–12, instead of VSR 2009–10, as in SN-OPS, SY 2011–12.

While the design of the sample remained the same, the expansion of the sample added some extra complexity to determining the probability of being selected into the sample. Some of the new units (75) existed in the VSR 2009–10 data file, and some (53) only existed in the VSR 2011–12 data file. Thus, the probability for the first group of 75 had to be conditioned on the fact that they were not selected in SN-OPS, SY 2011–12, while the probability for the second group of 53 had to be based on the “population” of SFAs that could be found in VSR 2011–12 but not in VSR 2009–10. Since SY 2013–14 faced similar issues as SN-OPS, SY 2012–13, more details on determining these probabilities are provided below.

## C.2 The SY 2013–14 Sample

The SY 2013–14 sample differed from the SN-OPS, SY 2012–13 sample in a several ways. First, six SFAs were determined to be ineligible during SN-OPS, SY 2012–13 because they closed and were removed from the sample. Second, five eligible SFAs that were originally in SN-OPS, SY 2011–12 but not SN-OPS, SY 2012–13 were added to the SY 2013–14 sample (these are listed in TABLE C.1). The net result was a sample size of 1,881, of which 1,876 are in SN-OPS, SY 2012–13 and 1,754 are in SN-OPS, SY 2011–12. Because of the differences in SN-OPS, SY 2012–13 and SY 2013–14 samples, 1,751 (of the 1,754 noted

<sup>4</sup> No data are provided in the VSR files to determine why an SFA ceases to exist. The most likely causes include closure, assimilation by another SFA, and dropping out of the NSLP.

above) are in all three years. For SY 2013–14, the sample increased from the SN-OPS, SY 2011–12 sample of 127. Of these, 78 existed in VSR 2009–10, implying that they could have been selected for the SN-OPS, SY 2011–12 sample, and 49 existed in VSR 2011–12 but not in VSR 2009–10. TABLE C.1 presents distributions over three characteristics (*sfasize*, *region*, and *sfapov*) of the SY 2013–14 sampling frame (i.e., the public SFAs in the VSR 2011–12 file) and the SY 2013–14 sample.

TABLE C.1 *Distributions of the Sampling Frame and Sample Over Several Characteristics of SFAs: SN-OPS, SY 2013–14 SFA Director Survey*

Characteristic	Sampling Frame			Sample		
	SFA Size (Students)	Total	Percent	Total	Percent	Implied Sampling Rate
<1,000	7,919	52.4	487	25.9	0.06	
1,000–2,499	3,357	22.1	387	20.6	0.12	
2,500–4,999	1,948	12.7	328	17.4	0.17	
5,000–9,999	1,045	6.9	249	13.2	0.24	
10,000–24,999	605	4	220	11.7	0.36	
25,000–99,999	268	1.8	184	9.8	0.69	
100,000+	26	0.2	26	1.4	1.00	
<b>Total</b>	<b>15,168</b>	<b>100</b>	<b>1,881</b>	<b>100</b>		
<b>SFA Poverty</b>						
Low (0–29 percent FR/P)	3,096	20.2	426	22.7	0.14	
Medium (30–59.9 percent F/RP)	6,752	44.6	839	44.6	0.12	
High (60 percent or more F/RP)	5,320	35.2	616	32.8	0.12	
<b>Total</b>	<b>15,168</b>	<b>100</b>	<b>1,881</b>	<b>100</b>		
<b>FNS Region</b>						
Northeast	1,790	11.6	215	11.4	0.12	
Mid-Atlantic	1,516	10.0	202	10.7	0.13	
Southeast	1,262	8.3	248	13.2	0.20	
Midwest	3,813	25.2	413	22.0	0.11	
Southwest	2,256	14.9	272	14.5	0.12	
Mountain Plains	2,381	15.7	219	11.6	0.09	
Western	2,150	14.2	312	16.6	0.15	
<b>Total</b>	<b>15,168</b>	<b>100</b>	<b>1,881</b>	<b>100</b>		

Source: SY 2011–12 Verification Summary Report Data File.

TABLE C.1 shows that the sampling frame contains 15,168 SFAs, which is 42 more than the total in the VSR 2011–12 data noted above. This reflects the way two SFAs were treated in the sample. Each operated the NSLP at multiple campuses and could not answer a single survey with aggregate information for their entire SFA. Therefore, they were sent surveys for each campus—one had a total of five campuses, while the other had three—effectively treating them as separate SFAs. For consistency, the sampling frame was correspondingly expanded to reflect the possibility that these campuses could have been selected during the sampling process.<sup>5</sup> With probability weights (the inverse of the

<sup>5</sup> This procedure was used because it was followed in Years 1 and 2.

probability of being selected) equal to 6.2 (first SFA) and 9.1 (the second), 24 was added to the margin total for size category 2,500–4,999 (the size category of the first) and 18 to the total for category 1,000–2,499 (the size category for the second). Similarly, since both SFAs are in Northeast Region and in the low poverty category, 42 was added to these totals.

TABLE C.1 demonstrates that there were 26 large SFAs in the sampling frame and the sample—a requirement of the sample design.<sup>6</sup> The last column in TABLE C.1 shows the implied average sampling rates; note that the rate increases as the size category increases. This reflects the sampling design that called for relatively high probabilities of selection for the larger SFAs. The implied sampling rates are approximately uniform over the SFA poverty categories, but less uniform over the FNS Regions. In particular, the relatively low rates in the Mountain Plains Region indicate relatively few larger districts.

### C.3 Weighting Procedures for SY 2013–14 Survey of School Food Authorities

As a complex sample, it is important to weight the sample data before calculating summary statistics. Otherwise, a sample statistic may be a biased estimate for the desired population measure. Two sets of weights were constructed for the SY 2013–14 data: (1) cross-sectional weights designed to analyze the entire sample of SFAs that completed the SY 2013–14 survey ( $n=1,598$ ) and (2) two samples of longitudinal weights designed to analyze the subset of SY 2013–14 responding SFAs that (a) also completed the SN-OPS, SY 2012–13 survey ( $n=1,350$ ), and (b) completed all three years' surveys ( $n=1,069$ ). First, the procedure used to analyze the cross-sectional weights is described, followed by a discussion of the longitudinal weights analysis.

#### C.3.1 Cross-Sectional Weights

##### Sample Weights

As noted above, the stratified sample design for the third year of the SN-OPS is derived from procedures used in Years 1 and 2. For SY 2013–14 (SY 2013–14), of 1,881 sample units, 1,754 (carry-over units) existed in SN-OPS, SY 2011–12. The carry-over sample was supplemented with a small number of SFAs that were newly selected from either the VSR 2009–10 sample frame or the VSR 2011–12 sample frame. For the additional 127 units added in SY 2013–14, those that existed in the VSR 2009–10 sample frame ( $n=78$ ) are called “*Year1\_add*”, while those that only exist in the VSR 2011–12 file ( $n=49$ ) are called “*New*.” This distinction is relevant, because the *Year1\_add* units could have been selected in SN-OPS, SY 2011–12, but the *New* units did not exist in the SN-OPS, SY 2011–12 sampling frame. The newly selected SFAs were selected at rates that depended on the current enrollment size class of the SFA, so that when combined with the carry-over samples, the weights for both the carry-over and supplemental selections were approximately uniform with the current size category. TABLE C.2 summarizes the distribution of the SFA sample by selection status and size category.

<sup>6</sup> A tabulation of VSR 2011–12 indicates 27 large SFAs. The explanation for the difference is one obvious data entry error in the VSR data file for SY 2011–12, namely the number of enrolled students with access to the NSLP (or SBP for SBP only schools) for a particular district. This district had total enrollment of 2,028 in SY2011–12 according to the National Center for Educational Statistics but was coded as having enrollment of 201,231 in the VSR data file. Therefore, for defining the sampling frame, this SFA was recoded to have enrollment of 2,000. This is an important adjustment because one requirement of the study was to collect information from all SFAs with enrolled students greater than or equal to 100,000. Moreover, this particular district was not in the SN-OPS, SY 2011–12 or SN-OPS, SY 2012–13 samples, confirming that it was recoded in the SN-OPS, SY 2012–13 study as well.

TABLE C.2 *Distribution of Sample SFAs by Selection Status and Current Size Category*

Selection Status	Size category							Total
	Under 1,000	1,000–2,499	2,500–4,999	5,000–9,999	10,000–24,999	25,000–99,999	100,000+	
Carry-Over Sample From SN-OPS, SY 2011–12	433	369	305	242	207	173	25	1,754
Additional Units From the SN-OPS, SY 2011–12 Sample Frame	18	13	18	6	12	11	0	78
New Units From SN-OPS, SY 2012–13 Sample Frame	36	5	5	1	1	0	1	49
<b>Total Sample Size for SN-OPS, SY 2013–14</b>	<b>487</b>	<b>387</b>	<b>328</b>	<b>249</b>	<b>220</b>	<b>184</b>	<b>26</b>	<b>1,881</b>

Keeping in mind that the sampling frame for the additional 127 units is the VSR 2011–12 file, the probability of selection for the *Year1\_add* units is:

$$P^3 = P^1 + (1 - P^1) \times P^3|NS. \tag{1}$$

In (1),  $P^1$  is the probability of being selected in SN-OPS, SY 2011–12 and  $P^3|NS$  is the conditional probability of selection in SY 2013–14 given no selection in SN-OPS, SY 2011–12.  $P^1$  is found in the SN-OPS, SY 2011–12 report, while the conditional probability is the observed sampling rate for the *Year1\_add* group after removing the 1,754 units from the sampling frame. The probability of selection for the 49 *New* SFAs is the observed sampling rate from the sampling frame created from only the “new” SFAs in the VSR 2011–12 file. The set of “new” SFAs in the VSR 2011–12 file compared to the VSR 2009–10 file was identified by matching the two files first on *state\_cd* and *state\_sfaid*, and then on SFA name. There were 644 new SFAs in the VSR 2011–12 file, which define the sampling frame and, therefore, the observed sampling rates of the 49 cases.

The probability of selecting a “new” SFA in current size category is simply:

$$P_{new} = n_h/N_h \tag{2}$$

In (2),  $n_h$  is the sample size in each size category, and  $N_h$  is the corresponding number of SFAs in the derived sampling frame mentioned above.

TABLE C.3 summarizes the distribution of Public SFAs in 2009–10, 2011–12, and “new” SFAs in 2011–12 by size category. The new SFAs were observed to be relatively small; almost 90 percent of the new SFAs are under 1,000 in enrollment.

TABLE C.3 *Enrollment Size Distributions for Public SFAs in 2009–10, 2011–12, and New SFAs in 2011–12*

SFA Size	2009–10	Percent	2011–12	Percent	New in 2011–12	Percent
<1,000	7,633	51.58	7,919	52.35	577	89.6
1,000–2,499	3,297	22.28	3,339	22.07	42	6.52
2,500–4,999	1,946	13.15	1,924	12.72	17	2.64
5,000–9,999	1,043	7.05	1,045	6.91	4	0.62
10,000–24,999	594	4.01	605	4.0	3	0.47
25,000–99,999	260	1.76	268	1.77	N/A	N/A
100,000+	26	0.18	26	0.17	1	0.16
<b>Total</b>	<b>14,799</b>	<b>100</b>	<b>15,126</b>	<b>100</b>	<b>644</b>	<b>100</b>

**Note:** The New SFAs existed in the VSR2011–12 file but not in the VSR2009–10 file. N/A indicates that there were no SFAs in that category.

The SY 2013–14 base weights for SFA *i* in current size category *h* is defined to be the reciprocal of the corresponding probability of selection. The base weights are often referred to as “unbiased” weights because weighted totals using the base weights are theoretically unbiased in the absence of survey nonresponse. TABLE C.4 shows the theoretical weights (1÷probability) for the SY 2013–14 sample by their source. As can be seen in TABLE C.2, the sampling frame for the “new” units did not contain any organizations in the 25,000–99,999 category but did contain a new 100,000-plus category SFA. Correspondingly, Table C.3 indicates that there are no “new” sample units in the 25,000–99,999 student enrollment category and that one additional unit was selected with probability 1. One certainty unit from the SN-OPS, SY 2011–12 sample fell to the 25,000–99,999 group in the SY 2013–14 sample, but its weight remains 1 because the unit was selected with a probability of 1 into the sample; i.e., it is a certainty unit.

TABLE C.4 *Theoretical Weights for the SN-OPS, SY 2013–14 Sample*

SFA Size	Source		
	Year1	Year1_Add	New
<1,000	16.9779	16.3239	16.0256
1,000–2,499	9.0827	8.7681	8.3998
2,500–4,999	6.2035	5.8685	3.4002
5,000–9,999	4.3860	4.2790	4.0000
10,000–24,999	2.8711	2.7122	3.0030
25,000–99,999	1.5193	1.4267	N/A
100,000+	1	1	1

**Note:** Year1 refers to the weights used in SN-OPS, SY 2011–12 of SN-OPS. Year1\_Add refers to the weights calculated using equation (1). New refers to weights calculated with the sampling frame constructed from the (public) SFAs that existed in VSR2011–12 but not in VSR09-10. N/A indicates that there are no SFAs in that category.

### Raking of the Theoretical Weights

Several factors suggest that the theoretical weights will not perfectly represent the SY 2013–14 sampling frame. First, the theoretical weights reflect the original probabilities of inclusion in the SN-OPS, SY 2011–12 sample and the probabilities associated with being selected into the set of 127 SFAs that expanded the sample size for SY 2013–14. Second, the extra sample units added to accommodate two SFAs, Pembroke and Northwood, were assigned the full probability of their respective SFAs to maintain compatibility with Years 1 and 2. Third, the process of systematic sampling from the strata will, randomly, lead to some deviations from full representations of the sampling frame. Therefore, a “raking” algorithm was used to adjust the weights so that the margin totals obtained by the weighted sample would equal the margin totals of the VSR 2011–12 file. Under the raking algorithm, the base-weighted counts are successively adjusted to population counts for specified subgroups known as “raking dimensions.” Two raking dimensions were used to adjust the SY 2013–14 base weights: (1) enrollment size category and (2) the seven FNS regional offices. Raking involves iteratively adjusting the weights in each individual stratum until the margin totals for that stratum correspond with the sampling frame.<sup>7</sup> By implementing the two-dimension raking algorithm, the weighted counts first matched the corresponding population counts by SFA size category, and then further ratio-adjusted the weights from the initial adjustment so that the resulting weighted counts matched the corresponding population counts by FNS Region.

### Nonresponse Adjustment

The next step in the weighting process was to adjust the poststratified, raked weights to compensate for nonresponse in the SY 2013–14 survey. Of 1,881 SFAs in sample, 1,598 SFAs completed at least five sections of SY 2013–14 survey, for an overall unweighted response rate of 85.5 percent. Twelve SFAs were determined to be ineligible for SY 2013–14 survey. TABLE C.5 summarizes the categorization of SFA sample by survey response status.

TABLE C.5 *Categorization of SFA Sample Response Rate: SN-OPS, SY 2013–14*

Category	Cases
Valid Responses	
Completed Questions from All Sections	1,537
Completed Questions from at Least Five Sections	61
Incomplete Responses	
Four or More Sections Left Blank	64
No Response	207
Ineligible	12
Sample Size	1,881
Response Rate (Valid Responses ÷ Sample Size)	85.5

<sup>7</sup> For a non-technical presentation of raking, see Heeringa, Steven G., Brady T. West, and Patricia Berglund. 2010. “Getting to Know the Complex Sample Design.” In *Applied Survey Data Analysis*, by Steven G. Heeringa, Brady T. West, and Patricia Berglund, 13-52. Boca Raton, FL: CRC Press.

The purpose of the adjustment was to compensate for differential nonresponse losses by distributing a portion of the weighted count of the non-responding cases to the responding cases in the sample. Any systematic differences between the responders and non-responders in a survey can lead to nonresponse bias in the estimation of population parameters. For example, if none of the fewer than 1,000 enrollment size SFAs answered the survey, any estimates of (say) average meal prices would be suspect.

Potential for nonresponse bias was investigated using a CHAID (Chi-Squared Automatic Interaction Detection) analysis of the response rates. CHAID is a computationally intensive technique for determining significantly different “cells” in predicting nonresponse/response. For example, assume that an investigator would like to know if a particular cell composed of sample units from the Western Region, of size 2,500–4,999 students and with relatively high percentages of Asian students, has a significantly different response rate than a cell composed of SFAs from the Northeast Region, of size 25,000-99,999 students, and relatively low percentages of Asian students. A specific test could be performed to answer the question for this cell-by-cell comparison.

For SY 2013–14 of SN-OPS, the response rate was 85 percent and evidence of systematic (predictable) differences in the non-responses was not expected, when compared to the responses. For comparability with Years 1 and 2, however, a CHAID analysis was conducted using the same set of variables as done in SN-OPS, SY 2012–13. All of the variables listed in TABLE C.6 were employed in the CHAID analysis. Entering all of the variables as unordered categories, no significantly different cells were found. This does not mean that there are no differences in the actual response rates across the variable margins (SFA size, FNS Region, etc.) but that such differences are not “explained” in a statistically significant way by the combinations of the categories of the variables listed in TABLE C.6. This finding is consistent with a conclusion of no nonresponse bias. However, responses to represent the VSR 2011–12 sample frame were still needed, which could be accomplished by re-raking the data. Thus, the weights were raked again to adjust the responses to compensate for the nonresponses. This raking was performed over SFA Size, FNS Region, and SFA Poverty status as determined by percentages of free and reduced-price meals (the original strata for systematic sampling).

TABLE C.6 *Names and Descriptions of the Derived Variables Employed in the CHAID Analysis*

<b>Variable</b>	<b>Label</b>
<i>ap_fr_el</i>	Number of applications free eligible (VSR)
<i>ap_fr_in</i>	Number of applications free eligible income (VSR)
<i>ap_tr</i>	Number of applications total reduced-price eligible (VSR)
<i>Locale</i>	Type of locale (CCD)
<i>Minstat</i>	Percent minority status (CCD)
<i>pct_ai</i>	Percent American Indian in SFA (CCD)
<i>pct_as</i>	Percent Asian in SFA (CCD)
<i>pct_bk</i>	Percent Black/African American in SFA (CCD)
<i>pct_hs</i>	Percent Hispanic in SFA (CCD)
<i>pct_pi</i>	Percent Pacific Islander in SFA (CCD)
<i>pct_wh</i>	Percent White in SFA (CCD)
<i>Provsch</i>	Dichotomous variable reflecting the existence of provision schools in SFA (VSR)
<i>region_id</i>	SFA regional office (VSR)
<i>sch_sfa</i>	Number of schools in SFA (VSR)
<i>sfa_lev</i>	Instructional level (CCD)
<i>Sfapov</i>	SFA free/reduced lunch percentage categories/poverty status (VSR)
<i>Sfsize</i>	SFA Enrollment size (VSR)
<i>st_fe_ca</i>	Number of students free eligible categorically (VSR)
<i>st_fe_nv</i>	Number of students free eligible not verified (VSR)
<i>st_fie</i>	Number of students free income (VSR)
<i>st_t_fe</i>	Number of students total free eligible (VSR)
<i>st_tr_pe</i>	Number of students total reduced-price eligible (VSR)
<i>type08</i>	Educational agency type code (CCD)

TABLE C.7 summarizes the final weighted counts of the cross-sectional sample by SFA size category and FNS Region.

TABLE C.7 *Unweighted and Weighted Counts of Respondents in the Cross-Sectional Sample by Size Category and FNS Region*

SFA Size Category	Number OF Responding SFAs	Weighted Counts Of Respondents	FNS Region	Number Of Responding SFAs	Weighted Counts Of Respondents
<1,000	383	7,919	Northeast (NERO)	184	1,790
1,000–2,499	325	3,349	Mid-Atlantic (MARO)	162	1,516
2,500–4,999	283	1,948	Southeast (SERO)	209	1,254
5,000–9,999	223	1,045	Midwest (MWRO)	348	3,813
10,000–24,999	190	605	Southwest (SWRO)	247	2,256
25,000–99,999	168	268	Mountain Plains (MPRO)	191	2,381
100,000+	26	26	Western (WRO)	257	2,150
<b>Total</b>	<b>1,598</b>	<b>15,160</b>	<b>Total</b>	<b>1,598</b>	<b>15,160</b>

### Replicate Weights for Variance Estimation

In a study that uses simple random sampling, the variance for estimates of population parameters can be determined by statistical theory. In a study such as SY 2013–14 of SN-OPS that uses a complex sampling design, the variance must be determined in a different fashion. The researchers in Years 1 and 2 employed the Jackknife (JKn) estimation technique to estimate the variances for any estimates from the sample data. Therefore, the SY 2013–14 study employed this approach as well. The JKn approach is common in large surveys because the information necessary to implement the procedure can be passed along to other researchers easily and without compromising confidential information.

The JKn relies on the creation of “replicate” weights, some of which are zero, that are used to build an empirical distribution of the estimate under consideration. For example, with a sample size of  $n=10$ , the point estimate would use the weights and all 10 observations in calculating the estimate. To get an empirical distribution for this point estimate, 10 replicate weights could be created where the weight for one of the observations is set to zero in each replicate and all other weights are adjusted to compensate for the “loss” of the observation. With the replicates, the estimate could be calculated 10 times to build an empirical distribution of the estimate to use with statistical tests.

For the SY 2013–14 study, 100 replicate weights were created using similar procedures as in SN-OPS, SY 2012–13. First, six variance strata were defined based on SFA size, leaving off the largest category because they were selected with certainty and could not contribute to the estimation of the variance. Second, within each variance stratum, a number of groups (“donors”) were created so that the size of the groups was approximately the same between the variance strata (the groups ranged in size from 15–18). For example, in variance stratum 1, there were 25 groups; in stratum 2, there were 21; and so on, as

displayed in TABLE C.8.<sup>8</sup> Third, a replicate weight was created for each group—25 replicate weights from variance stratum 1, 21 weights from stratum 2, etc. These weights were calculated by setting all of the weights in the group under consideration to zero and then reweighting the remaining members of the other groups within the same variance stratum to compensate for the loss of the donor group within that stratum. The reweighting involves multiplying the remaining groups by the ratio of the number of groups to the number of groups minus one. For example, in variance stratum 1, the replicate weight was the base weights  $\times (25 \div 24)$  or zero. The replicate weight equaled the *base weights* for members of groups that are in the other variance strata. Fourth, the JK<sub>n</sub> factor and finite population correction (FPC) factor for each stratum were added.<sup>9</sup>

For the FPC factors, the variance stratum sampling rate was used.<sup>10</sup> As seen in TABLE C.8, the FPC approaches 1 and in fact was set to 1 for the certainty units. The JK<sub>n</sub> Factor is the ratio of the number of groups in the stratum minus one to the number of groups in the stratum. Thus for variance stratum 1, the JK<sub>n</sub> Factor =  $24 \div 25$ ; for stratum 2, the JK<sub>n</sub> Factor =  $20 \div 21$ , and so on.

The units in the final SFA size were all selected with probability 1 and did not contribute to the variance of population estimates. Hence, they were not assigned a replicate weight. Similarly, one SFA was selected with probability 1 but it was in the 6th variance stratum in SY 2013–14. To handle this situation, an 8th stratum with just that SFA was created, and the FPC Factor was set to 1.

TABLE C.8 *Number of Donor Groups, JK<sub>n</sub> Factors, and FPC Factors for Jackknife Variance Estimation*

Variance Stratum	Number of Groups	JK <sub>n</sub> Factor	FPC Factor
1	25	0.96	0.0625
2	21	0.952	0.116
3	17	0.941	0.1705
4	13	0.923	0.238
5	12	0.917	0.364
6	12	0.917	0.687

## C.4 Longitudinal Weights

The design of the SN-OPS series facilitated repeated (over three years) observations on some variables. These longitudinal data facilitate more precise estimates of differences in population parameters. For example, one could look at the national estimate for average meal prices by three computations from the full data sets in Years 1, 2, and 3 and get some sense of the trend in prices. Additionally, one could

<sup>8</sup> See Special Nutrition Program Operations Study: Update on State and SFA Policies and Practices since Authorization of HHFKA (SN-OPS, SY 2012–13). November 2014.

<sup>9</sup> The FPC is the stratum sampling rate. It is used to adjust estimates of the variance when sampling is done without replacement, as is the case in SN-OPS.

<sup>10</sup> The SN-OPS, SY 2012–13 researchers used the “effective sampling rate” for the FPC, which is the weighted rate determined from the responding SFAs. The sampling rate was chosen because (a) it is known and (b) it is theoretically correct.

look at only the sample units that answered the survey in all three years and determine the difference for each SFA and then look at a national average. The longitudinal data will provide a more precise estimate but risks some bias from discarding the SFAs that did not respond in every year. Appropriate longitudinal weights will help to minimize these risks.

To create the longitudinal weights, the same processes were followed as in creating the SY 2013–14 cross-sectional weights described above; i.e., determine the correct probability of being in a longitudinal sample. Two samples were considered here: (1) those SFAs completing the SN-OPS, SY 2012–13 and SY 2013–14 surveys and (2) those SFAs completing surveys in all three years. For the first sample, 1,491 SFAs responded to the survey in SN-OPS, SY 2012–13. Theoretically, the final probability for these 1,491 was the probability that they were selected for inclusion in longitudinal sample of Years 2 and 3. Of these, six were found to be ineligible during SY 2013–14, and 1,350 responded in SY 2013–14, yielding a conditional response rate of  $1,350 \div 1,485 = 91$  percent. With a relatively high response rate, evidence of significantly different response rates by cells of the categorical variables listed in TABLE C.6 was not expected to be found. Moreover, the weights for the 1,491 already reflected some nonresponse adjustments that carried over to SY 2013–14. Applying the CHAID algorithm to the SN-OPS, SY 2012–13 sample with respect to the derived variables listed in TABLE C.6 data did not result in finding any significant cells—as expected. To compensate for the 135 SFAs that did not respond, the SN-OPS, SY 2012–13 final, nonresponse-adjusted, full sample weights were raked. To facilitate variance estimation, a set of 100 replicates was created using the same procedure as noted above. The main differences in this case were that the size of the donor groups was smaller (due to smaller sample size) and the FPC was measured as the weighted sampling rates for each stratum. The reason for using the weighted sampling rates here was that, since the actual sampling rates were not known, the weighted rates approximated the theoretically correct FPC.

To determine the longitudinal weights for estimates that used the common variables in the data from SY 2011–12, SY 2012–13, and SY 2013–14, the 1,176 SFAs that answered the survey in Years 1 and 2 were considered first. All of these cases appeared in the SY 2013–14 sample ( $n=1,881$ ) but five were found to be ineligible to participate in SY 2013–14. Thus, of the 12 ineligible organizations in SY 2013–14, five had answered the survey the previous two years. Removing these from the 1,176 made the sample size for longitudinal studies using the data from all three years equal to 1,171. Of these, 1,069 responded in SY 2013–14 for an overall conditional response rate of 91.3 percent. Again, significant predictors of nonresponse were not expected to be found, and the CHAID analysis confirmed this expectation. Thus, the SN-OPS, SY 2011–12 longitudinal weights were raked to compensate for the 102 nonresponses in SY 2013–14. As before, these adjustments preserved the totals along the *sfasize*, *region*, and poverty status dimensions. The final full sample weight was used for longitudinal analyses of common variables in all years. Finally, 100 replicate weights were created following the procedures noted above. TABLE C.9 shows the FPC for each of the longitudinal weights. The JK<sub>n</sub> factors were the same, since the number of groups within variance strata were kept the same.

TABLE C.9 *FPC Factors for the SN-OPS, SY 2012–13 to SY 2013–14 and SN-OPS, SY 2011–12 to SY 2013–14 Longitudinal Samples*

Variance Stratum	FPC Factor for SY 2012–13 to SY 2013–14	FPC Factor for SY 2011–12- SY 2013–14
<b>1</b>	0.042	0.033
<b>2</b>	0.082	0.064
<b>3</b>	0.116	0.092
<b>4</b>	0.171	0.143
<b>5</b>	0.256	0.218
<b>6</b>	0.514	0.445
<b>7</b>	1.000	0.697
<b>8</b>	1.000	1.000

## Appendix D Supplemental Tables

TABLE D.1 *Among SFAs That Participate in the SBP in Each School Year, the Percentage that Receive SBP Severe Need Reimbursement, SY 2011–12, SY 2012–13, and SY 2013–14*

Grade Level	SY 2011–12		SY 2012–13		SY 2013–14	
	Percent of SFAs	Wgtd <i>n</i> (Unwgt'd <i>n</i> ) <sup>1</sup>	Percent of SFAs	Wgtd <i>n</i> (Unwgt'd <i>n</i> ) <sup>1</sup>	Percent of SFAs	Wgtd <i>n</i> (Unwgt'd <i>n</i> ) <sup>1</sup>
With Elementary Schools	72.0	11,349 (103)	<sup>a</sup> 80.6	11,443 (1,271)	<sup>b</sup> 65.8	11,662 (1,366)
With Middle Schools	64.9	8,495 (1,023)	<sup>a</sup> 68.3	8,581 (1,093)	<sup>b</sup> 57.5	8,593 (1,159)
With High Schools	61.0	9,803 (1,105)	<sup>a</sup> 66.3	10,071 (1,182)	<sup>b</sup> 53.9	9,983 (1,257)
With Other Schools	67.6	3,854 (474)	60.5	4,651 (532)	<sup>b</sup> 57.9	4,287 (546)
All Schools	73.2	13,227 (1,315)	<sup>a</sup> 82.5	13,775 (1,406)	<sup>b</sup> 64.5	13,917 (1,510)

<sup>1</sup> *n* equals the number of SFAs that participated in the SBP for each school type for a particular school year.

<sup>a</sup> Percentage of SFAs differed significantly between SY 2011–12 and SY 2012–13.

<sup>b</sup> Percentage of SFAs differed significantly between SY 2012–13 and SY 2013–14.

**Source:** SFA Director Survey SY 2011–12, question 2.2; SFA Director Survey SY 2012–13, question 1.3; SFA Director Survey SY 2013–14, question 1.2c.

TABLE D.2 *Among States With Charter Schools, the Number of Charter Schools and the Percentage Participating in the NSLP and the SBP, SY 2012–13 and SY 2013–14*

State	SY 2012–13					SY 2013–14				
	Total Number of Charter Schools	NSLP		SBP		Total Number of Charter Schools	NSLP		SBP	
		Number	Percent	Number	Percent		Number	Percent	Number	Percent
Alaska	27	11	40.7	7	25.9	10	10	100.0	5	50.0
Arizona	534	N/R	N/R	N/R	N/R	N/A	N/A	N/A	N/A	N/A
Arkansas	32	26	81.3	25	78.1	31	31	100.0	31	100.0
California	1,065	692	65.0	551	51.7	1130	625	55.3	515	45.6
Colorado	186	145	78.0	77	41.4	200	<sup>a</sup> N/R	<sup>a</sup> N/R	83	41.5
Connecticut	17	16	94.1	14	82.4	30	26	86.7	24	80.0
Delaware	22	17	77.3	12	54.5	21	<sup>a</sup> N/R	<sup>a</sup> N/R	14	66.7
District of Columbia	57	52	91.2	52	91.2	57	57	100.0	57	100.0
Florida	576	457	79.3	434	75.3	615	508	82.6	480	78.0
Georgia	108	103	95.4	39	36.1	111	33	29.7	33	29.7
Hawaii	32	24	75.0	19	59.4	32	20	62.5	13	40.6
Idaho	44	37	84.1	23	52.3	47	24	51.1	10	21.3
Illinois	58	35	60.3	34	58.6	143	111	77.6	110	76.9
Indiana	72	62	86.1	59	81.9	65	65	100.0	57	87.7
Iowa	15	7	46.7	7	46.7	N/A	N/A	N/A	N/A	N/A
Kansas	105	69	65.7	68	64.8	N/A	N/A	N/A	N/A	N/A
Louisiana	2	1	50.0	1	50.0	32	32	100.0	31	96.9
Maryland	52	51	98.1	51	98.1	47	47	100.0	47	100.0
Massachusetts	77	70	90.9	63	81.8	60	60	100.0	60	100.0
Michigan	276	276	100.0	236	85.5	391	291	74.4	253	64.7
Minnesota	148	N/R	N/R	N/R	N/R	150	129	86.0	125	83.3
Missouri	38	36	94.7	35	92.1	38	36	94.7	34	89.5
Nevada	32	2	6.3	1	3.1	34	9	26.5	9	26.5
New Hampshire	17	3	17.6	0	0.0	22	4	18.2	4	18.2
New Jersey	86	75	87.2	70	81.4	98	98	100.0	95	96.9
New Mexico	94	47	50.0	37	39.4	40	40	100.0	15	37.5
New York	209	182	87.1	176	84.2	261	238	91.2	235	90.0
North Carolina	107	43	40.2	15	14.0	182	40	22.0	29	15.9
Ohio	374	284	75.9	275	73.5	389	284	73.0	278	71.5
Oklahoma	24	19	79.2	19	79.2	25	22	88.0	22	88.0
Oregon	123	71	57.7	56	45.5	124	77	62.1	60	48.4

State	SY 2012–13					SY 2013–14				
	Total Number of Charter Schools	NSLP		SBP		Total Number of Charter Schools	NSLP		SBP	
		Number	Percent	Number	Percent		Number	Percent	Number	Percent
Pennsylvania	175	N/R	N/R	N/R	N/R	300	N/R	N/R	N/R	N/R
Rhode Island	16	13	81.3	13	81.3	19	19	100.0	19	100.0
South Carolina	55	17	30.9	17	30.9	19	19	100.0	19	100.0
Tennessee	47	100	47.0	100	47.0	67	67	100.0	67	100.0
Texas	280	149	53.2	160	57.1	496	454	91.5	495	99.8
Utah	88	61	69.3	28	31.8	95	70	73.7	32	33.7
Vermont	N/A	N/A	N/A	N/A	N/A	32	31	96.9	31	96.9
Virginia	4	0	0.0	0	0.0	3	0	0.0	0	0.0
Wisconsin	N/R	N/R	N/R	N/R	N/R	244	0	0.0	0	0.0
Wyoming	N/R	N/R	N/R	N/R	N/R	3	3	100.0	3	100.0
<b>Total</b>	<b>5,512</b>	<b>3,200</b>	<b>58.1</b>	<b>2,721</b>	<b>49.4</b>	<b>4,534</b>	<b>3,851</b>	<b>84.9</b>	<b>3,395</b>	<b>74.9</b>

<sup>a</sup> The total number of charter schools and program participation totals reported by State directors included implausible values. Therefore, the values were determined as Not Reported (N/R).

**Notes:** Questions not answered by State directors were indicated as Not Reported (N/R). The total number of charter schools reported in the State CN Director survey 2013–14 was set equal to the total number of charter schools as reported by the National Alliance of Charter Schools when the number reported in the survey exceeded that reported by the National Alliance. See: <http://dashboard.publiccharters.org/dashboard/schools/page/overview/year/2014>

**Source:** State CN Director Survey SY 2013–14, questions C3a and C3b; and count of the number of charter schools for SY 2013–14 as reported by the National Alliance of Charter Schools.

TABLE D.3 *Among States With Charter Schools, the Number of Charter Schools Participating in the NSLP and the SBP, SY 2013–14*

State <sup>1</sup>	Total Number of Charter Schools	NSLP Only	SBP Only	Both NSLP and SBP
Alaska	10	5	0	5
Arizona	N/A	N/A	N/A	N/A
Arkansas	31	0	0	31
California	1,130	111	1	514
Colorado	200	157	0	83
Connecticut	30	2	0	24
Delaware	21	17	0	14
District of Columbia	57	0	0	57

State <sup>1</sup>	Total Number of Charter Schools	NSLP Only	SBP Only	Both NSLP and SBP
Florida	615	28	0	480
Georgia	111	0	0	33
Hawaii	32	8	1	12
Idaho	47	14	0	10
Iowa	N/A	N/A	N/A	N/A
Illinois	143	1	0	110
Indiana	65	8	0	57
Kansas	N/A	N/A	N/A	N/A
Kentucky	N/A	N/A	N/A	N/A
Louisiana	32	1	0	31
Maine	5	1	0	0
Maryland	47	0	0	47
Massachusetts	60	0	0	60
Michigan	391	38	0	253
Minnesota	150	4	0	125
Missouri	38	2	0	34
Mississippi	N/A	N/A	N/A	N/A
Montana	N/A	N/A	N/A	N/A
Nebraska	N/A	N/A	N/A	N/A
Nevada	34	0	0	9
New Hampshire	22	0	0	4
New Jersey	98	3	0	95
New Mexico	40	25	0	15
New York	261	3	0	235
North Carolina	182	11	0	29
Ohio	389	6	0	278
Oklahoma	25	0	0	22
Oregon	124	17	0	60
Pennsylvania	300	N/R	N/R	N/R
Puerto Rico	N/A	N/A	N/A	N/A
Rhode Island	19	0	0	19
South Carolina	19	0	0	19
South Dakota	N/A	N/A	N/A	N/A
Tennessee	67	N/R	N/R	67
Texas	496	1	42	453
Utah	95	38	0	32
Vermont	32	1	1	30
Virginia	3	0	0	0
Virgin Islands	N/A	N/A	N/A	N/A

State <sup>1</sup>	Total Number of Charter Schools	NSLP Only	SBP Only	Both NSLP and SBP
Washington	N/A	N/A	N/A	N/A
West Virginia	N/A	N/A	N/A	N/A
Wisconsin	244	N/R	0	N/R
Wyoming	3	N/R	N/R	3
<b>Total</b>	<b>5,668</b>	<b>502</b>	<b>45</b>	<b>3,350</b>

<sup>1</sup> Number of States is less than 55 due to including only States with data available on number of charter schools and States with charter schools.

**Notes:** Questions not answered by State directors were indicated as Not Reported (N/R). The total number of charter schools reported in the State CN Director Survey 2013–14 was set equal to the total number of charter schools as reported by the National Alliance of Charter Schools when the number reported in the survey exceeded that reported by the national alliance. See: <http://dashboard.publiccharters.org/dashboard/schools/page/overview/year/2014>. States reporting no charter schools are indicated as N/A.

**Source:** State CN Director Survey SY 2013–14, questions C3a and C3b; and count of the number of charter schools for SY 2013–14 as reported by the National Alliance of Charter Schools.

TABLE D.4 *Number and Percentage of SFAs With Schools Operating NSLP Only Under Specific Provisions, as Reported by State CN Directors, SY 2013–14*

State	Number of SFAs in State	Number of Schools in State	NSLP Only Under Provision 1		NSLP Only Under Provision 2		NSLP Only Under Provision 3		NSLP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Alabama	191	1,364	0	0.0	0	0.0	0	0.0	N/A	N/A
Alaska	68	409	0	0.0	0	0.0	1	1.5	N/A	N/A
Arizona	489	1,706	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Arkansas	312	1,107	0	0.0	0	0.0	0	0.0	N/A	N/A
California	1,295	9,819	0	0.0	9	0.7	0	0.0	N/A	N/A
Colorado	231	1,695	0	0.0	0	0.0	0	0.0	N/A	N/A
Connecticut	202	1,063	0	0.0	0	0.0	0	0.0	N/A	N/A
Delaware	48	220	0	0.0	0	0.0	0	0.0	N/A	N/A
DC	67	226	0	0.0	0	0.0	0	0.0	N/A	N/A
Florida	277	3,609	0	0.0	0	0.0	0	0.0	N/A	N/A
Georgia	236	2,299	0	0.0	0	0.0	0	0.0	N/A	N/A
Guam	3	43	0	0.0	0	0.0	0	0.0	N/A	N/A
Hawaii	35	295	N/R	0.0	1	2.9	N/R	0.0	N/A	N/A
Idaho	162	670	0	0.0	0	0.0	0	0.0	N/A	N/A
Illinois	1,152	4,257	0	0.0	1	0.1	0	0.0	N/A	N/A
Indiana	550	2,068	0	0.0	0	0.0	0	0.0	N/A	N/A
Iowa	487	1,330	0	0.0	0	0.0	0	0.0	N/A	N/A

State	Number of SFAs in State	Number of Schools in State	NSLP Only Under Provision 1		NSLP Only Under Provision 2		NSLP Only Under Provision 3		NSLP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Kansas	415	1,521	0	0.0	0	0.0	0	0.0	N/A	N/A
Kentucky	200	1,388	N/R	0.0	N/R	0.0	N/R	0.0	N/A	N/A
Louisiana	140	1,541	N/R	0.0	0	0.0	N/R	0.0	N/A	N/A
Maine	205	595	0	0.0	1	0.5	0	0.0	N/A	N/A
Maryland	67	1,477	0	0.0	0	0.0	0	0.0	N/A	N/A
Massachusetts	464	1,941	N/R	0.0	N/R	0.0	N/R	0.0	N/A	N/A
Michigan	876	3,357	0	0.0	0	0.0	0	0.0	N/A	N/A
Minnesota	690	1,996	0	0.0	0	0.0	1	0.1	N/A	N/A
Mississippi	186	949	0	0.0	1	0.5	0	0.0	N/A	N/A
Missouri	777	2,389	0	0.0	0	0.0	0	0.0	N/A	N/A
Montana	239	690	0	0.0	0	0.0	0	0.0	N/A	N/A
Nebraska	391	1,252	N/R	0.0	0	0.0	N/R	0.0	N/A	N/A
Nevada	32	593	0	0.0	0	0.0	0	0.0	N/A	N/A
New Hampshire	107	444	0	0.0	0	0.0	0	0.0	N/A	N/A
New Jersey	729	2,596	0	0.0	0	0.0	0	0.0	N/A	N/A
New Mexico	222	897	0	0.0	4	1.8	0	0.0	N/A	N/A
New York	1,124	5,612	0	0.0	4	0.4	0	0.0	N/A	N/A
North Carolina	177	2,495	0	0.0	0	0.0	0	0.0	N/A	N/A
North Dakota	207	397	0	0.0	0	0.0	0	0.0	N/A	N/A
Ohio	1,305	3,778	0	0.0	0	0.0	0	0.0	N/A	N/A
Oklahoma	604	1,826	0	0.0	0	0.0	0	0.0	N/A	N/A
Oregon	280	1,223	0	0.0	0	0.0	0	0.0	N/A	N/A
Pennsylvania	894	3,424	N/R	0.0	0	0.0	N/R	0.0	N/A	N/A
Puerto Rico	38	1,770	0	0.0	N/R	0.0	N/R	0.0	N/A	N/A
Rhode Island	79	329	0	0.0	0	0.0	0	0.0	N/A	N/A
South Carolina	148	1,173	0	0.0	0	0.0	0	0.0	N/A	N/A
South Dakota	219	836	0	0.0	1	0.5	0	0.0	N/A	N/A
Tennessee	195	1,768	N/R	0.0	N/R	0.0	N/R	0.0	N/A	N/A
Texas	1,251	8,180	0	0.0	0	0.0	0	0.0	N/A	N/A
Utah	103	897	0	0.0	0	0.0	0	0.0	N/A	N/A
Vermont	92	343	0	0.0	0	0.0	0	0.0	N/A	N/A
Virginia	173	1,900	0	0.0	0	0.0	0	0.0	N/A	N/A
Virgin Islands	4	60	0	0.0	0	0.0	0	0.0	N/A	N/A
Washington	337	1,950	0	0.0	0	0.0	0	0.0	N/A	N/A
West Virginia	96	718	7	7.3	0	0.0	0	0.0	N/A	N/A
Wisconsin	809	2,525	0	0.0	0	0.0	0	0.0	N/A	N/A
Wyoming	69	318	N/R	0.0	N/R	0.0	N/R	0.0	N/A	N/A
<b>Total</b>	<b>19,749</b>	<b>97,328</b>	<b>7</b>	<b>0.0</b>	<b>22</b>	<b>0.1</b>	<b>2</b>	<b>0.0</b>	<b>N/A</b>	<b>N/A</b>

State	Number of SFAs in State	Number of Schools in State	NSLP Only Under Provision 1		NSLP Only Under Provision 2		NSLP Only Under Provision 3		NSLP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent

**Notes:** Questions not answered by State directors were indicated as Not Reported (N/R). In addition, NA is indicated in CEP columns since schools and SFAs that participate in CEP must participate in both the NSLP and the SBP programs.

**Source:** State CN Director Survey SY 2013–14, questions C1 and C2; VSR Dataset-FNS 2013–14.

TABLE D.5 *Number and Percentage of Schools Operating NSLP Only Under Specific Provisions, as Reported by State CN Directors, SY 2013–14*

State	Number of Schools in State	Number of SFAs in State	NSLP Only Under Provision 1		NSLP Only Under Provision 2		NSLP Only Under Provision 3		NSLP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Alabama	1,364	191	0	0.0	0	0.0	0	0.0	N/A	N/A
Alaska	409	68	N/R	N/R	N/R	N/R	10	2.4	N/A	N/A
Arizona	1,706	489	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Arkansas	1,107	312	0	0.0	0	0.0	0	0.0	N/A	N/A
California	9,819	1,295	0	0.0	14	0.1	0	0.0	N/A	N/A
Colorado	1,695	231	0	0.0	0	0.0	0	0.0	N/A	N/A
Connecticut	1,063	202	N/R	N/R	N/R	N/R	N/R	0.0	N/A	N/A
Delaware	220	48	0	0.0	0	0.0	0	0.0	N/A	N/A
DC	226	67	0	0.0	0	0.0	0	0.0	N/A	N/A
Florida	3,609	277	0	0.0	0	0.0	0	0.0	N/A	N/A
Georgia	2,299	236	0	0.0	0	0.0	0	0.0	N/A	N/A
Guam	43	3	0	0.0	0	0.0	0	0.0	N/A	N/A
Hawaii	295	35	N/R	N/R	1	0.3	N/R	N/R	N/A	N/A
Idaho	670	162	0	0.0	0	0.0	0	0.0	N/A	N/A
Illinois	4,257	1,152	0	0.0	1	0.0	0	0.0	N/A	N/A
Indiana	2,068	550	0	0.0	0	0.0	0	0.0	N/A	N/A
Iowa	1,330	487	0	0.0	0	0.0	0	0.0	N/A	N/A
Kansas	1,521	415	0	0.0	0	0.0	0	0.0	N/A	N/A
Kentucky	1,388	200	0	0.0	0	0.0	0	0.0	N/A	N/A
Louisiana	1,541	140	N/R	N/R	0	0.0	N/R	N/R	N/A	N/A
Maine	595	205	0	0.0	1	0.2	0	0.0	N/A	N/A
Maryland	1,477	67	0	0.0	0	0.0	0	0.0	N/A	N/A
Massachusetts	1,941	464	0	0.0	0	0.0	0	0.0	N/A	N/A
Michigan	3,357	876	0	0.0	0	0.0	0	0.0	N/A	N/A

State	Number of Schools in State	Number of SFAs in State	NSLP Only Under Provision 1		NSLP Only Under Provision 2		NSLP Only Under Provision 3		NSLP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Minnesota	1,996	690	0	0.0	0	0.0	1	0.1	N/A	N/A
Mississippi	949	186	0	0.0	1	0.1	0	0.0	N/A	N/A
Missouri	2,389	777	0	0.0	0	0.0	0	0.0	N/A	N/A
Montana	690	239	0	0.0	2	0.3	0	0.0	N/A	N/A
Nebraska	1,252	391	N/R	N/R	0	0.0	N/R	N/R	N/A	N/A
Nevada	593	32	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
New Hampshire	444	107	0	0.0	0	0.0	0	0.0	N/A	N/A
New Jersey	2,596	729	0	0.0	0	0.0	0	0.0	N/A	N/A
New Mexico	897	222	0	0.0	20	2.2	0	0.0	N/A	N/A
New York	5,612	1,124	0	0.0	10	0.2	0	0.0	N/A	N/A
North Carolina	2,495	177	0	0.0	0	0.0	0	0.0	N/A	N/A
North Dakota	397	207	0	0.0	0	0.0	0	0.0	N/A	N/A
Ohio	3,778	1,305	0	0.0	0	0.0	0	0.0	N/A	N/A
Oklahoma	1,826	604	0	0.0	0	0.0	0	0.0	N/A	N/A
Oregon	1,223	280	0	0.0	1	0.1	0	0.0	N/A	N/A
Pennsylvania	3,424	894	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Puerto Rico	1,770	38	0	0.0		0.0	0	0.0	N/A	N/A
Rhode Island	329	79	0	0.0	0	0.0	0	0.0	N/A	N/A
South Carolina	1,173	148	0	0.0	0	0.0	0	0.0	N/A	N/A
South Dakota	836	219	0	0.0	2	0.2	0	0.0	N/A	N/A
Tennessee	1,768	195	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Texas	8,180	1,251	0	0.0	0	0.0	0	0.0	N/A	N/A
Utah	897	103	0	0.0	0	0.0	0	0.0	N/A	N/A
Vermont	343	92	0	0.0	0	0.0	0	0.0	N/A	N/A
Virginia	1,900	173	0	0.0	0	0.0	0	0.0	N/A	N/A
Virgin Islands	60	4	0	0.0	0	0.0	0	0.0	N/A	N/A
Washington	1,950	337	0	0.0	0	0.0	0	0.0	N/A	N/A
West Virginia	718	96	7	1.0	0	0.0	0	0.0	N/A	N/A
Wisconsin	2,525	809	0	0.0	0	0.0	0	0.0	N/A	N/A
Wyoming	318	69	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
<b>Total</b>	<b>97,328</b>	<b>19,749</b>	<b>7</b>	<b>0.0</b>	<b>53</b>	<b>0.1</b>	<b>0</b>	<b>0.0</b>	<b>N/A</b>	<b>N/A</b>

**Notes:** Questions not answered by State directors were indicated as Not Reported (N/R). In addition, NA is indicated in CEP columns since schools and SFAs that participate in CEP must participate in both the NSLP and the SBP programs.

**Source:** State CN Director Survey SY 2013–14, questions C1 and C2; VSR Dataset-FNS 2013–14.

TABLE D.6 *Number and Percentage of SFAs With Schools Operating the SBP Only Under Specific Provision, as Reported by State CN Directors, SY 2013–14*

State	Number of SFAs in State	Number of Schools in State	SBP Only Under Provision 1		SBP Only Under Provision 2		SBP Only Under Provision 3		SBP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Alabama	191	1,364	0	0.0	0	0.0	0	0.0	N/A	N/A
Alaska	68	409	0	0.0	0	0.0	0	0.0	N/A	N/A
Arizona	489	1,706	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Arkansas	312	1,107	0	0.0	1	0.3	0	0.0	N/A	N/A
California	1,295	9,819	1	0.1	21	1.6	0	0.0	N/A	N/A
Colorado	231	1,695	0	0.0	4	1.7	0	0.0	N/A	N/A
Connecticut	202	1,063	0	0.0	0	0.0	0	0.0	N/A	N/A
Delaware	48	220	0	0.0	0	0.0	0	0.0	N/A	N/A
District of Columbia	67	226	0	0.0	0	0.0	0	0.0	N/A	N/A
Florida	277	3,609	0	0.0	17	6.1	0	0.0	N/A	N/A
Georgia	236	2,299	0	0.0	19	8.1	0	0.0	N/A	N/A
Guam	3	43	0	0.0	0	0.0	0	0.0	N/A	N/A
Hawaii	35	295	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Idaho	162	670	0	0.0	65	40.1	0	0.0	N/A	N/A
Illinois	1,152	4,257	0	0.0	0	0.0	0	0.0	N/A	N/A
Indiana	550	2,068	0	0.0	5	0.9	0	0.0	N/A	N/A
Iowa	487	1,330	0	0.0	0	0.0	0	0.0	N/A	N/A
Kansas	415	1,521	0	0.0	0	0.0	0	0.0	N/A	N/A
Kentucky	200	1,388	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Louisiana	140	1,541	N/R	N/R	1	0.7	N/R	N/R	N/A	N/A
Maine	205	595	0	0.0	1	0.5	0	0.0	N/A	N/A
Maryland	67	1,477	0	0.0	1	1.5	0	0.0	N/A	N/A
Massachusetts	464	1,941	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Michigan	876	3,357	0	0.0	0	0.0	0	0.0	N/A	N/A
Minnesota	690	1,996	0	0.0	1	0.1	0	0.0	N/A	N/A
Mississippi	186	949	0	0.0	13	7.0	0	0.0	N/A	N/A
Missouri	777	2,389	0	0.0	15	1.9	0	0.0	N/A	N/A
Montana	239	690	0	0.0	0	0.0	0	0.0	N/A	N/A
Nebraska	391	1,252	N/R	N/R	3	0.8	N/R	N/R	N/A	N/A
Nevada	32	593	0	0.0	0	0.0	0	0.0	N/A	N/A
New Hampshire	107	444	0	0.0	0	0.0	0	0.0	N/A	N/A
New Jersey	729	2,596	0	0.0	1	0.1	0	0.0	N/A	N/A
New Mexico	222	897	0	0.0	5	2.3	0	0.0	N/A	N/A

State	Number of SFAs in State	Number of Schools in State	SBP Only Under Provision 1		SBP Only Under Provision 2		SBP Only Under Provision 3		SBP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
New York	1,124	5,612	0	0.0	17	1.5	0	0.0	N/A	N/A
North Carolina	177	2,495	0	0.0	0	0.0	0	0.0	N/A	N/A
North Dakota	207	397	0	0.0	0	0.0	0	0.0	N/A	N/A
Ohio	1,305	3,778	0	0.0	12	0.9	0	0.0	N/A	N/A
Oklahoma	604	1,826	0	0.0	0	0.0	0	0.0	N/A	N/A
Oregon	280	1,223	0	0.0	23	8.2	0	0.0	N/A	N/A
Pennsylvania	894	3,424	N/R	N/R	0	0.0	N/R	N/R	N/A	N/A
Puerto Rico	38	1,770	0	0.0	0	0.0	0	0.0	N/A	N/A
Rhode Island	79	329	0	0.0	0	0.0	0	0.0	N/A	N/A
South Carolina	148	1,173	0	0.0	0	0.0	0	0.0	N/A	N/A
South Dakota	219	836	0	0.0	0	0.0	0	0.0	N/A	N/A
Tennessee	195	1,768	N/R	N/R	1	0.5	N/R	N/R	N/A	N/A
Texas	1,251	8,180	0	0.0	0	0.0	0	0.0	N/A	N/A
Utah	103	897	0	0.0	0	0.0	0	0.0	N/A	N/A
Vermont	92	343	0	0.0	5	5.4	0	0.0	N/A	N/A
Virgin Islands	4	60	0	0.0	0	0.0	0	0.0	N/A	N/A
Virginia	173	1,900	0	0.0	6	3.5	0	0.0	N/A	N/A
Washington	337	1,950	0	0.0	3	0.9	0	0.0	N/A	N/A
West Virginia	96	718	0	0.0	0	0.0	0	0.0	N/A	N/A
Wisconsin	809	2,525	0	0.0	0	0.0	0	0.0	N/A	N/A
Wyoming	69	318	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
<b>Total</b>	<b>19,749</b>	<b>97,328</b>	<b>1</b>	<b>0.0</b>	<b>240</b>	<b>0.2</b>	<b>0</b>	<b>0.0</b>	<b>N/A</b>	<b>N/A</b>

**Notes:** Questions not answered by State directors were indicated as Not Reported (N/R). In addition, NA is indicated in CEP columns since schools and SFAs that participate in CEP must participate in both the NSLP and the SBP programs.

**Source:** State CN Director Survey 2013–14, questions C1 and C2; State CN Director Survey 2013–14, questions C1 and C2; VSR Dataset-FNS 2013–14.

TABLE D.7 *Number and Percentage of Schools Operating the SBP Only Under Specific Provision, as Reported by State CN Directors, SY 2013–14*

State	Number of SFAs in State	Number of Schools in State	SBP Only Under Provision 1		SBP Only Under Provision 2		SBP Only Under Provision 3		SBP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Alabama	191	1,364	0	0.0	0	0.0	0	0.0	N/A	N/A
Alaska	68	409	N/R	N/R	N/R	N/R	0	0.0	N/A	N/A

State	Number of SFAs in State	Number of Schools in State	SBP Only Under Provision 1		SBP Only Under Provision 2		SBP Only Under Provision 3		SBP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Arizona	489	1,706	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Arkansas	312	1,107	0	0.0	9	0.8	0	0.0	N/A	N/A
California	1,295	9,819	1	0.0	180	1.8	0	0.0	N/A	N/A
Colorado	231	1,695	0	0.0	40	2.4	0	0.0	N/A	N/A
Connecticut	202	1,063	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Delaware	48	220	0	0.0	0	0.0	0	0.0	N/A	N/A
District of Columbia	67	226	0	0.0	0	0.0	0	0.0	N/A	N/A
Florida	277	3,609	0	0.0	402	11.1	0	0.0	N/A	N/A
Georgia	236	2,299	0	0.0	12	0.5	0	0.0	N/A	N/A
Guam	3	43	0	0.0	0	0.0	0	0.0	N/A	N/A
Hawaii	35	295	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
Idaho	162	670	0	0.0	283	42.2	0	0.0	N/A	N/A
Illinois	1,152	4,257	0	0.0	0	0.0	0	0.0	N/A	N/A
Indiana	550	2,068	0	0.0	35	1.7	0	0.0	N/A	N/A
Iowa	487	1,330	0	0.0	10	0.8	0	0.0	N/A	N/A
Kansas	415	1,521	0	0.0	0	0.0	0	0.0	N/A	N/A
Kentucky	200	1,388	0	0.0	22	1.6	0	0.0	N/A	N/A
Louisiana	140	1,541	N/R	N/R	76	4.9	N/R	N/R	N/A	N/A
Maine	205	595	0	0.0	8	1.3	0	0.0	N/A	N/A
Maryland	67	1,477	0	0.0	193	13.1	0	0.0	N/A	N/A
Massachusetts	464	1,941	0	0.0	265	13.7	0	0.0	N/A	N/A
Michigan	876	3,357	0	0.0	0	0.0	0	0.0	N/A	N/A
Minnesota	690	1,996	0	0.0	66	3.3	0	0.0	N/A	N/A
Mississippi	186	949	0	0.0	84	8.9	0	0.0	N/A	N/A
Missouri	777	2,389	0	0.0	108	4.5	0	0.0	N/A	N/A
Montana	239	690	0	0.0	0	0.0	0	0.0	N/A	N/A
Nebraska	391	1,252	N/R	N/R	109	8.7	N/R	N/R	N/A	N/A
Nevada	32	593	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
New Hampshire	107	444	0	0.0	0	0.0	0	0.0	N/A	N/A
New Jersey	729	2,596	0	0.0	5	0.2	0	0.0	N/A	N/A
New Mexico	222	897	0	0.0	15	1.7	0	0.0	N/A	N/A
New York	1,124	5,612	0	0.0	20	0.4	0	0.0	N/A	N/A
North Carolina	177	2,495	0	0.0	0	0.0	0	0.0	N/A	N/A
North Dakota	207	397	0	0.0	0	0.0	0	0.0	N/A	N/A
Ohio	1,305	3,778	0	0.0	99	2.6	0	0.0	N/A	N/A
Oklahoma	604	1,826	0	0.0	5	0.3	0	0.0	N/A	N/A
Oregon	280	1,223	0	0.0	130	10.6	0	0.0	N/A	N/A
Pennsylvania	894	3,424	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A

State	Number of SFAs in State	Number of Schools in State	SBP Only Under Provision 1		SBP Only Under Provision 2		SBP Only Under Provision 3		SBP Only Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Puerto Rico	38	1,770	0	0.0	N/R	N/R	N/R	N/R	N/A	N/A
Rhode Island	79	329	0	0.0	0	0.0	0	0.0	N/A	N/A
South Carolina	148	1,173	0	0.0	0	0.0	0	0.0	N/A	N/A
South Dakota	219	836	0	0.0	0	0.0	0	0.0	N/A	N/A
Tennessee	195	1,768	N/R	N/R	19	1.1	N/R	N/R	N/A	N/A
Texas	1,251	8,180	0	0.0	8	0.1	0	0.0	N/A	N/A
Utah	103	897	0	0.0	0	0.0	0	0.0	N/A	N/A
Vermont	92	343	0	0.0	14	4.1	0	0.0	N/A	N/A
Virgin Islands	4	60	0	0.0	0	0.0	0	0.0	N/A	N/A
Virginia	173	1,900	0	0.0	88	4.6	0	0.0	N/A	N/A
Washington	337	1,950	0	0.0	16	0.8	0	0.0	N/A	N/A
West Virginia	96	718	0	0.0	0	0.0	0	0.0	N/A	N/A
Wisconsin	809	2,525	0	0.0	0	0.0	0	0.0	N/A	N/A
Wyoming	69	318	N/R	N/R	N/R	N/R	N/R	N/R	N/A	N/A
<b>Total</b>	<b>19,749</b>	<b>97,328</b>	<b>1</b>	<b>0.0</b>	<b>2,321</b>	<b>2.4</b>	<b>0</b>	<b>0.0</b>	<b>N/A</b>	<b>N/A</b>

**Notes:** Questions not answered by State directors were indicated as Not Reported (N/R). In addition, NA is indicated in CEP columns since schools and SFAs that participate in CEP must participate in both NSLP and SBP programs.

**Source:** State CN Director Survey 2013–14, questions C1 and C2; VSR Dataset-FNS 2013–14.

TABLE D.8 *Number and Percentage of SFAs Operating Both the NSLP and the SBP Under Specific Provision, as Reported by State CN Directors, SY 2013–14*

State	Number of SFAs in State	Number of Schools in State	Both Under Provision 1		Both Under Provision 2		Both Under Provision 3		Both Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Alabama	191	1,364	0	0.0	7	3.7	0	0.0	0	0.0
Alaska	68	409	0	0.0	0	0.0	16	23.5	0	0.0
Arizona	489	1,706	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Arkansas	312	1,107	0	0.0	22	7.1	0	0.0	0	0.0
California	1,295	9,819	3	0.2	126	9.7	1	0.1	0	0.0
Colorado	231	1,695	0	0.0	2	0.9	0	0.0	0	0.0
Connecticut	202	1,063	0	0.0	8	4.0	0	0.0	0	0.0
Delaware	48	220	0	0.0	8	16.7	0	0.0	0	0.0
District of Columbia	67	226	0	0.0	0	0.0	0	0.0	32	47.8

State	Number of SFAs in State	Number of Schools in State	Both Under Provision 1		Both Under Provision 2		Both Under Provision 3		Both Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
			Columbia							
Florida	277	3,609	0	0.0	6	2.2	0	0.0	34	12.3
Georgia	236	2,299	0	0.0	30	12.7	0	0.0	50	21.2
Guam	3	43	0	0.0	1	33.3	0	0.0	0	0.0
Hawaii	35	295	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Idaho	162	670	0	0.0	15	9.3	0	0.0	0	0.0
Illinois	1,152	4,257	0	0.0	2	0.2	1	0.1	100	8.7
Indiana	550	2,068	0	0.0	7	1.3	1	0.2	0	0.0
Iowa	487	1,330	0	0.0	2	0.4	7	1.4	0	0.0
Kansas	415	1,521	0	0.0	0	0.0	0	0.0	0	0.0
Kentucky	200	1,388	0	0.0	0	0.0	0	0.0	103	51.5
Louisiana	140	1,541	N/R	N/R	0	0.0	N/R	N/R	N/R	N/R
Maine	205	595	0	0.0	11	5.4	0	0.0	0	0.0
Maryland	67	1,477	0	0.0	0	0.0	0	0.0	2	3.0
Massachusetts	464	1,941	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Michigan	876	3,357	0	0.0	0	0.0	0	0.0	156	17.8
Minnesota	690	1,996	0	0.0	8	1.2	4	0.6	0	0.0
Mississippi	186	949	0	0.0	24	12.9	0	0.0	0	0.0
Missouri	777	2,389	0	0.0	0	0.0	2	0.3	0	0.0
Montana	239	690	0	0.0	23	9.6	0	0.0	0	0.0
Nebraska	391	1,252	N/R	N/R	4	1.0	N/R	N/R	N/R	N/R
Nevada	32	593	0	0.0	3	9.4	0	0.0	0	0.0
New Hampshire	107	444	0	0.0	0	0.0	0	0.0	0	0.0
New Jersey	729	2,596	4	0.5	2	0.3	0	0.0	0	0.0
New Mexico	222	897	0	0.0	126	56.8	0	0.0	0	0.0
New York	1,124	5,612	0	0.0	92	8.2	0	0.0	86	7.7
North Carolina	177	2,495	0	0.0	0	0.0	0	0.0	0	0.0
North Dakota	207	397	0	0.0	22	10.6	1	0.5	0	0.0
Ohio	1,305	3,778	0	0.0	23	1.8	0	0.0	129	9.9
Oklahoma	604	1,826	0	0.0	22	3.6	13	2.2	0	0.0
Oregon	280	1,223	0	0.0	24	8.6	0	0.0	0	0.0
Pennsylvania	894	3,424	N/R	N/R	7	0.8	N/R	N/R	N/R	N/R
Puerto Rico	38	1,770	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Rhode Island	79	329	0	0.0	0	0.0	0	0.0	0	0.0
South Carolina	148	1,173	0	0.0	0	0.0	0	0.0	N/R	N/R
South Dakota	219	836	0	0.0	40	18.3	3	1.4	0	0.0
Tennessee	195	1,768	N/R	N/R	1	0.5	1	0.5	N/R	N/R
Texas	1,251	8,180	0	0.0	105	8.4	0	0.0	0	0.0

State	Number of SFAs in State	Number of Schools in State	Both Under Provision 1		Both Under Provision 2		Both Under Provision 3		Both Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
			Utah	103	897	0	0.0	1	1.0	3
Vermont	92	343	0	0.0	3	3.3	0	0.0	0	0.0
Virginia	173	1,900	0	0.0	2	1.2	0	0.0	0	0.0
Virgin Islands	4	60	0	0.0	0	0.0	0	0.0	0	0.0
Washington	337	1,950	0	0.0	24	7.1	0	0.0	0	0.0
West Virginia	96	718	52	54.2	0	0.0	0	0.0	39	40.6
Wisconsin	809	2,525	0	0.0	11	1.4	0	0.0	0	0.0
Wyoming	69	318	N/R	N/R	1	1.4	3	4.3	N/R	N/R
<b>Total</b>	<b>19,749</b>	<b>97,328</b>	<b>59</b>	<b>0.3</b>	<b>815</b>	<b>4.1</b>	<b>56</b>	<b>0.3</b>	<b>731</b>	<b>3.7</b>

**Note:** Questions not answered by State directors were indicated as Not Reported (N/R).

**Source:** State CN Director Survey SY 2012–13, questions D1 and D2; State CN Director Survey SY 2012–13, questions C1 and C2; State CN Director Survey 2013–14, questions C1 and C2; VSR Dataset-FNS 2013–14.

TABLE D.9 *Number and Percentage of Schools Operating Both the NSLP and the SBP Under Specific Provision, as Reported by State CN Directors, SY 2013–14*

State	Number of SFAs in State	Number of Schools in State	Both Under Provision 1		Both Under Provision 2		Both Under Provision 3		Both Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
			Alabama	191	1,364	0	0.0	30	2.2	0
Alaska	68	409	N/R	N/R	N/R	N/R	114	27.9	N/R	N/R
Arizona	489	1,706	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Arkansas	312	1,107	0	0.0	87	7.9	0	0.0	0	0.0
California	1,295	9,819	12	0.1	1,293	13.2	2	0.0	0	0.0
Colorado	231	1,695	0	0.0	3	0.2	0	0.0	0	0.0
Connecticut	202	1,063	N/R	N/R	148	13.9	N/R	N/R	N/R	N/R
Delaware	48	220	0	0.0	17	7.7	0	0.0	0	0.0
District of Columbia	67	226	0	0.0	0	0.0	0	0.0	122	54.0
Florida	277	3,609	0	0.0	68	1.9	0	0.0	378	10.5
Georgia	236	2,299	0	0.0	102	4.4	0	0.0	437	19.0
Guam	3	43	0	0.0	9	20.9	0	0.0	0	0.0

State	Number of SFAs in State	Number of Schools in State	Both Under Provision 1		Both Under Provision 2		Both Under Provision 3		Both Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Hawaii	35	295	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Idaho	162	670	0	0.0	30	4.5	0	0.0	0	0.0
Illinois	1,152	4,257	0	0.0	26	0.6	2	0.0	696	16.3
Indiana	550	2,068	0	0.0	71	3.4	23	1.1	0	0.0
Iowa	487	1,330	0	0.0	15	1.1	20	1.5	0	0.0
Kansas	415	1,521	0	0.0	0	0.0	0	0.0	0	0.0
Kentucky	200	1,388	0	0.0	0	0.0	0	0.0	103	7.4
Louisiana	140	1,541	N/R	N/R	0	0.0	N/R	N/R	N/R	N/R
Maine	205	595	0	0.0	12	2.0	0	0.0	0	0.0
Maryland	67	1,477	0	0.0	0	0.0	0	0.0	6	0.4
Massachusetts	464	1,941	0	0.0	12	0.6	0	0.0	125	6.4
Michigan	876	3,357	0	0.0	0	0.0	0	0.0	549	16.4
Minnesota	690	1,996	0	0.0	9	0.5	6	0.3	0	0.0
Mississippi	186	949	0	0.0	75	7.9	0	0.0	0	0.0
Missouri	777	2,389	0	0.0	0	0.0	2	0.1	0	0.0
Montana	239	690	0	0.0	69	10.0	0	0.0	0	0.0
Nebraska	391	1,252	N/R	N/R	4	0.3	N/R	N/R	N/R	N/R
Nevada	32	593	N/R	N/R	44	7.4	N/R	N/R	N/R	N/R
New Hampshire	107	444	0	0.0	0	0.0	0	0.0	0	0.0
New Jersey	729	2,596	5	0.2	5	0.2	0	0.0	0	0.0
New Mexico	222	897	0	0.0	305	34.0	0	0.0	0	0.0
New York	1,124	5,612	0	0.0	394	7.0	0	0.0	830	14.8
North Carolina	177	2,495	0	0.0	0	0.0	0	0.0	0	0.0
North Dakota	207	397	0	0.0	30	7.6	4	1.0	0	0.0
Ohio	1,305	3,778	0	0.0	31	0.8	0	0.0	423	11.2
Oklahoma	604	1,826	0	0.0	38	2.1	21	1.2	0	0.0
Oregon	280	1,223	0	0.0	81	6.6	0	0.0	0	0.0
Pennsylvania	894	3,424	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Puerto Rico	38	1,770	0	0.0	N/R	N/R	N/R	N/R	0	0.0
Rhode Island	79	329	0	0.0	0	0.0	0	0.0	0	0.0
South Carolina	148	1,173	0	0.0	0	0.0	0	0.0	N/R	N/R
South Dakota	219	836	0	0.0	141	16.9	46	5.5	0	0.0
Tennessee	195	1,768	N/R	N/R	7	0.4	3	0.2	N/R	N/R
Texas	1,251	8,180	0	0.0	927	11.3	0	0.0	0	0.0
Utah	103	897	0	0.0	6	0.7	5	0.6	0	0.0
Vermont	92	343	0	0.0	8	2.3	0	0.0	0	0.0
Virginia	173	1,900	0	0.0	2	0.1	0	0.0	0	0.0
Virgin Islands	4	60	0	0.0	0	0.0	0	0.0	0	0.0

State	Number of SFAs in State	Number of Schools in State	Both Under Provision 1		Both Under Provision 2		Both Under Provision 3		Both Under CEP	
			Number	Percent	Number	Percent	Number	Percent	Number	Percent
Washington	337	1,950	0	0.0	69	3.5	0	0.0	0	0.0
West Virginia	96	718	386	53.8	0	0.0	0	0.0	345	48.1
Wisconsin	809	2,525	0	0.0	17	0.7	0	0.0	0	0.0
Wyoming	69	318	N/R	N/R	2	0.6	8	2.5	N/R	N/R
<b>Total</b>	<b>19,749</b>	<b>97,238</b>	<b>403</b>	<b>0.4</b>	<b>4,187</b>	<b>4.3</b>	<b>256</b>	<b>0.3</b>	<b>4014</b>	<b>4.1</b>

**Note:** Questions not answered by State directors were indicated as Not Reported (N/R).

**Source:** State CN Director Survey SY 2012–13, questions D1 and D2; State CN Director Survey SY 2012–13, questions C1 and C2; State CN Director Survey 2013–14, questions C1 and C2; VSR Dataset-FNS 2013–14.

TABLE D.10 *Changes in the Frequency of Using Fruit Products for Lunch Since the Implementation of the New Meal Pattern Requirements, as Reported by SFAs, SY 2012–13 and SY 2013–14*

SY 2012–13					
Fruit Products	Percentage of SFAs Indicating			Total SFAs	
	Use More Often	Same Frequency	Use Less Often	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>
Fresh Whole	57.8	39.3	2.9	14,730	1,468
Fresh Pre-Cut	34.6	50.2	15.2	14,609	1,460
Frozen Whole	13.0	61.9	25.1	14,613	1,458
Frozen Pre-Cut	14.0	60.8	25.2	14,582	1,454
Canned with Water	26.3	58.9	14.8	14,640	1,457
Canned with Juice	21.8	55.7	22.6	14,661	1,461
Canned with Light Syrup	21.0	46.4	32.7	14,682	1,464
SY 2013–14					
Fruit Products	Percentage of SFAs Indicating			Total SFAs	
	Use More Often	Same Frequency	Use Less Often	Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>2</sup>
Fresh Whole	54.9	40.8	4.3	14,856	1,576
Fresh Pre-Cut	34.2	51.4	14.4	14,735	1,566
Frozen Whole	15.8	60.8	23.4	14,687	1,558
Frozen Pre-Cut <sup>3</sup>	17.2	60.8	22.0	14,468	1,548
Canned with Water	29.0	56.5	14.5	14,626	1,558
Canned with Juice	23.2	52.3	24.5	14,668	1,561
Canned with Light Syrup	19.7	44.5	35.8	14,653	1,557
Canned with Heavy or Regular Syrup	1.0	25.4	73.6	14,498	1,544
100 Percent Fruit Juice	33.1	57.7	9.3	14,760	1,567
Dried Fruit	17.6	55.5	27.0	14,450	1,541

<sup>1</sup> *n* is less than 1,491 due to item nonresponse.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

<sup>3</sup> Changes in the frequency of using frozen pre-cut fruit differed significantly between SY 2012–13 and SY 2013–14.

**Note:** Each row represents the SFAs' answers to different questions on the survey. Percentages will add up to 100 percent, horizontally.

**Source:** SFA Director Survey SY 2012–13, question 5.13; SFA Director Survey SY 2013–14, question 5.5.

TABLE D.11 *Changes in the Frequency of Using Vegetable Products for Lunch Since the Implementation of the New Meal Pattern Requirements, as Reported by SFAs, SY 2012–13 and SY 2013–14*

Vegetables Products	SY 2012–13			Total SFAs	
	Percentage of SFAs Indicating			Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>1</sup>
	Use More Often	Same Frequency	Use Less Often		
Fresh Whole	53.2	40.8	6.0	14,698	1,465
Fresh Pre-Cut	51.0	41.5	7.5	14,685	1,465
Frozen Whole	22.4	61.6	16.0	14,596	1,457
Frozen Pre-Cut	30.6	58.2	11.2	14,631	1,460
Canned, Reduced Sodium	34.6	51.6	13.8	14,676	1,461
Canned, Regular Sodium	8.0	42.9	49.0	14,616	1,457
Vegetables Products	SY 2013–14			Total SFAs	
	Percentage of SFAs Indicating			Wgtd <i>n</i>	Unwgtd <i>n</i> <sup>2</sup>
	Use More Often	Same Frequency	Use Less Often		
Fresh Whole	48.5	45.7	5.7	14,688	1,562
Fresh Pre-Cut	49.0	43.2	7.8	14,671	1,562
Frozen Whole	22.9	62.4	14.7	14,533	1,551
Frozen Pre-Cut	31.4	57.5	11.1	14,642	1,559
Canned, No Salt Added	31.4	49.6	18.9	14,532	1,551
Canned, Reduced Sodium <sup>3</sup>	37.5	45.5	17.1	14,557	1,553
Canned, Regular Sodium <sup>4</sup>	4.5	34.4	61.1	14,429	1,544

<sup>1</sup> *n* is less than 1,491 due to item nonresponse.

<sup>2</sup> *n* is less than 1,598 due to item nonresponse.

<sup>3</sup> Observed use of vegetable products differed significantly between SY 2012–13 and SY 2013–14.

<sup>4</sup> Changes in the frequency of using canned-regular sodium and canned-reduced sodium vegetables differed significantly between SY 2012–13 and SY 2013.

**Note:** Each row represents the SFAs' answers to different questions on the survey. Percentages will add up to 100 percent, horizontally.

**Source:** SFA Director Survey SY 2012–13, question 5.16; SFA Director Survey SY 2013–14, question 5.6.

TABLE D.12 *Reasons SFAs Had Difficulty Purchasing Each Specific Vegetable Subgroup, by Vegetable Subgroup, SY 2013–14*

Vegetable Subgroups	Percent of SFAs					Total SFAs	
	Not Enough Variety on Market	Items Too Expensive	Items Not Acceptable To Students	Items Require Too Much Preparation	Limited Availability of Items	Wgtd <i>n</i>	Unwgtd <i>n</i>
Dark Green Vegetables	68.2	83.4	37.3	76.9	46.5	2,005	222
Red/Orange Vegetables	66.1	80.8	39.4	77.9	48.0	2,119	235
Bean/Peas	64.8	70.4	38.0	85.3	36.0	1,319	156
Starchy Vegetables	52.9	84.9	46.4	76.1	55.6	473	42
Other Vegetables	54.5	93.8	46.5	81.0	54.4	687	69

**Note:** Unweighted *n* is number of SFAs that had difficulty purchasing each vegetable subgroup.

**Source:** SFA Director Survey SY 2013–14, questions 5.19 and 5.20.

TABLE D.13 *Sodium Reduction Targets and Timeline by Grade Level*

Age/Grade Group	Sodium Reduction: Timeline & Amount		
	Target 1: July 1,2014 SY 2014–15 (mg)	Target 2: July 1,2017 SY 2017–18 (mg)	Final Target: July 1,2022 SY 2022–23 (mg)
<b>SCHOOL BREAKFAST PROGRAM</b>			
K–5	≤540	≤485	≤430
6–8	≤600	≤535	≤470
9–12	≤640	≤570	≤500
<b>NATIONAL SCHOOL LUNCH PROGRAM</b>			
K–5	≤1,230	≤935	≤640
6–8	≤1,360	≤1,035	≤710
9–12	≤1,420	≤1,080	≤740

**Source:** <http://www.fns.usda.gov/sites/default/files/sodium.pdf>

TABLE D.14 *Practices That SFAs Anticipated Implementing to Reduce Sodium Levels in SY 2014–15, by SFA Characteristics*

SFA characteristics	Percentage of SFAs							Current Sodium Levels Already Meet the 2014–15 Target	Other
	Purchase Lower Sodium Products	Alter Recipes	Discontinue or Change Some Menu Options	Limit Condiment Use	Order Low Sodium Products from USDA Foods More Often	Decrease Portion Sizes of Some Items			
All SFAs	82.4	66.8	64.8	52.3	48.7	16.9	13.6	2.7	
SFA Size <sup>1</sup>									
Small (1–999)	76.5	60.6	56.6	49.0	46.6	15.6	15.5	2.5	
Medium (1,000–4,999)	88.4	73.8	72.0	56.6	53.3	18.7	9.4	3.2	
Large (5,000–24,999)	89.0	71.2	78.0	54.9	46.0	16.6	16.3	2.6	
Very Large (25,000+)	89.8	77.8	77.7	50.5	39.0	23.1	20.3	1.1	
Urbanicity <sup>2</sup>									
City	72.2	65.2	59.8	43.3	37.4	14.7	21.0	3.2	
Suburban	87.8	68.6	72.4	51.5	51.8	17.4	13.2	1.9	
Town	85.2	69.8	66.3	51.5	51.8	17.5	8.0	3.2	
Rural	85.9	68.8	66.1	58.1	52.8	18.3	12.2	2.6	
Poverty Level									
Low (0–29 percent F/RP)	80.4	70.7	67.3	48.8	47.3	17.7	14.1	2.0	
Medium (30–59 percent F/RP)	85.1	66.2	64.8	53.7	48.7	17.1	11.9	2.3	
High (60 percent or more F/RP)	79.9	65.2	63.2	52.6	49.6	16.3	15.5	3.7	
Wgtd <i>n</i>	14,836	14,836	14,836	14,836	14,836	14,836	14,836	14,836	
Unwgted <sup>3</sup>	1,572	1,572	1,572	1,572	1,572	1,572	1,572	1,572	

<sup>1</sup> Percentage of SFAs that anticipated discontinuing or changing some menu options, altering recipes, and/or purchasing lower sodium products to reduce sodium levels differed significantly by SFA size. The percentage of SFAs with current sodium levels that already met the SY 2014–15 target differed significantly by SFA size.

<sup>2</sup> Percentage of SFAs that anticipated limiting condiment use, discontinuing or changing some menu options, altering recipes, purchasing lower sodium products, and/or ordering low sodium products from USDA Foods to reduce sodium levels differed by urbanicity in SY 2013–14. The percentage of SFAs with current sodium levels that already met the SY 2014–15 target differed significantly by SFA size.

<sup>3</sup> *n* is less than 1,598 due to item nonresponse.

**Note:** SFAs could respond to all actions so the percentages will not add up to 100 percent, horizontally.

**Source:** SFA Director Survey SY 2013–14, question 5.16.

TABLE D.15 *Types of Training in Smarter Lunchrooms Received by School Nutrition Staff, SY 2013–14*

Training	Percent	Wgtd n (Unwgtd n)
Creating Smarter Lunchrooms Online Course	32.6	1,349 (204)
Smarter Lunchrooms Movement Symposium	22.8	1,329 (207)
Smarter Lunchrooms Workshop Offered by the State	81.1	2,312 (315)
Team Nutrition Workshop or Webinar on Smarter Lunchrooms	71.6	1,816 (252)
<b>Other</b>	65.2	703 (106)
Training Provided by Another Organization or Group	15.3	
Training that was Self-Led by SFA Staff	10.4	
Unspecified Webinars, Courses, Conferences	9.6	
Training Provided by FSMC	8.8	
Smarter Lunchroom (Unspecified)	6.4	
Other	14.7	

**Notes:** 387 SFAs were aware of the Smarter Lunchrooms strategies and have received training on Smarter Lunchroom strategies. FSMC=Food Service Management Company.

**Source:** SFA Director Survey SY 2013–14, question 10.2a.

TABLE D.16 *Percentage of SFAs Reporting That All/Some/None of Their Schools Used at Least One Smarter Lunchroom Strategy in Each Strategy Category, and Estimated Number of Schools, SY 2013–14*

Strategy Categories	All		Some		None	
	Percent of SFAs	Estimated Number of Schools	Percent of SFAs	Estimated Number of Schools	Percent of SFAs	Estimated Number of Schools
Encourage Fruit Consumption	58.1	60,070	24.7	23,336	12.3	6,362
Encourage Vegetables Consumption	78.0	76,983	10.8	9,676	6.8	3,265
Encourage Consumption of Healthy Entrée	37.8	29,142	25.8	34,119	30.9	25,701
Encourage Consumption of White/Plain Milk	79.0	76,696	7.1	6,874	8.9	5,682
Encourage Consumption of Reimbursable Meals	27.2	26,141	23.0	34,731	<sup>a</sup> 45.0	28,353

<sup>a</sup> 21.6 percent of SFAs, an estimated 10,626 schools, reported that no school in the SFA had facilities to implement strategies from the reimbursable meal category.

**Source:** SFA Director Survey SY 2013–14, question 10.3.

TABLE D.17 *Number (Percentage) of SFAs That Reported That All of Their Schools Use at Least One Strategy from Two Different Categories, and the Estimated Number of Schools by SFA Size*

SFA Size	Number of SFAs (Percent)	Estimated Number of Schools
Small (1–999)	5,801 (73.3)	10,211
Medium (1,000–4,999)	4,533 (85.6)	22,233
Large (5,000–24,999)	1,450 (87.9)	23,040
Very Large (25,000+)	261 (88.6)	23,237

Source: SFA Director Survey SY 2013–14, question 10.3.

TABLE D.18 *Number (Percentage) of SFAs and Schools From the VSR 2013–14 Data File, by SFA Size*

SFA Size	Number of SFAs (percent)	Number of Schools (percent)
Small (1–999)	8,038 (52.7)	14,148 (15.4)
Medium (1,000–4,999)	5,272 (34.6)	25,858 (28.1)
Large (5,000–24,999)	1,643 (10.8)	26,107 (28.4)
Very Large (25,000+)	291 (1.9)	25,908 (28.2)
Total	15,244	92,021

Source: FNS Verification Summary Report Data, SY 2013–14.

TABLE D.19 *Among SFAs That Used FSMCs, the Number and Percentage of Schools That Used National, Regional, and Local FSMCs, as Reported by State CN Directors, SY 2011–12, SY 2012–13, and SY 2013–14*

Type of FSMC	Schools					
	SY 2011–12		SY 2012–13		SY 2013–14	
	Number	Percent	Number	Percent	Number	Percent
National Companies	7,645	77.2	8,323	82.3	8,980	74.7
Aramark	1,932	25.3	2,120	25.5	2,136	17.7
Chartwells	2,293	30.0	2,693	32.4	2,332	19.4
Preferred Meal System	236	3.1	544	6.5	557	4.6
Sodexo	2,785	36.4	2,262	27.2	3,376	28.1
Other National Companies	399	5.2	704	8.5	642	5.3
Regional Companies	1,481	15.0	1,317	13.0	3,077	25.6
Local Companies	777	7.8	471	4.7	679	5.6
Total Schools	9,903		10,111		12,023	
Total States	<sup>a</sup> 41		<sup>a</sup> 42		<sup>b</sup> 45	

<sup>a</sup> n is less than 54 States due to item nonresponse.

<sup>b</sup> n is less than 55 States due to item nonresponse.

Source: State CN Director Survey SY 2011–12, question D3; State CN Director Survey SY 2012–13, question C3; and State CN Director Survey SY 2013–14, question C8.

TABLE D.20 *Among SFAs With Schools Participating, the Number of Schools in Any Farm to School Activities or With Edible School Gardens, SY 2012–13*

SFA Characteristics	Any Farm to School Activities			95 Percent Confidence Interval		Had Edible School Gardens			95 Percent Confidence Interval	
	Number of Schools	Wgtd <i>n</i>	Unwgted <i>n</i>	Lower Bound	Upper Bound	Number of Schools	Wgtd <i>n</i>	Unwgted <i>n</i>	Lower Bound	Upper Bound
All SFAs	28,214	3,793	<sup>a</sup> 552	25,521	30,909	6,527	3,742	<sup>a</sup> 544	5,500	7,554
SFA Size										
Small (1–999)	2,200	1,117	55	1,279	3,122	705	1,097	54	332	1,239
Medium (1,000–4,999)	7,423	1,827	214	6,131	8,714	1,584	1,814	212	1,096	2,072
Large (5,000–24,999)	9,050	721	181	7,504	10,595	1,943	705	177	1,369	2,517
Very Large (25,000+)	9,542	159	107	8,008	11,075		158	106	1,764	2,842
Urbanicity										
City	8,265	491	127	6,634	9,895	2,220	480	123	1,638	2,803
Suburban	9,765	899	174	7,991	11,540	2,169	893	173	1,616	2,721
Town	3,549	873	93	2,566	4,532	772	862	93	412	1,133
Rural	6,011	1,446	149	4,697	7,326	1,272	1,424	146	792	1,753
Poverty Level										
Low (0–29 percent F/RP)	6,094	1,041	145	4,716	7,472	1,127	1,045	146	796	1,458
Medium (30–59 percent F/RP)	13,143	1,804	257	11,198	15,087	3,500	1,778	252	2,730	4,269
High (60 percent or more F/RP)	8,979	949	150	7,352	10,605	1,989	919	146	1,311	2,666

<sup>a</sup> *n* is less than 558 due to item nonresponse.

**Note:** Of the 558 SFAs that had schools participating in Farm to School activities during SY 2012–2013.

**Source:** SFA Director Survey SY 2013–14, questions 8.2 and 8.3.

TABLE D.21 Among States With SFAs Using FSMCs, the Percentage of SFAs Using FSMCs, by State, SY 2013–14

State	Number of SFAs in the State	Number of SFAs Using FSMCs <sup>1</sup>	Percentage of Total SFAs in the State Using FSMCs	Percentage Using Local Companies	Percentage Using Regional Companies	Percentage Using National Companies	National Companies					
							Percentage Using Aramark	Percentage Using Chartwells	Percentage Using Preferred Meal Systems	Percentage Using Sodexo	Percentage Using Other National Companies	
Alabama	189	3	1.6	0.5	0.0	1.1	0.5	0.0	0.0	0.0	0.0	0.5
Alaska	73	11	15.1	8.2	0.0	6.8	0.0	0.0	0.0	0.0	5.5	1.4
Arizona	458	76	16.6	0.0	0.0	16.6	0.4	2.4	0.0	6.1	7.6	
Arkansas	289	14	4.8	2.4	0.0	2.4	0.3	1.0	1.0	0.0	0.0	
California	1,094	151	13.8	2.3	0.2	11.3	0.4	0.2	0.0	4.1	6.7	
Colorado	226	19	8.4	0.4	1.3	6.6	0.9	4.0	0.0	1.8	0.0	
Connecticut	185	60	32.4	1.1	7.6	23.8	2.7	12.4	0.0	8.6	0.0	
Delaware	42	13	31.0	9.5	4.8	16.7	0.0	0.0	4.8	2.4	9.5	
DC	61	61	100.0	36.1	0.0	63.9	0.0	1.6	8.2	0.0	54.1	
Florida	223	26	11.7	0.9	0.9	9.9	0.0	2.2	0.0	1.3	6.3	
Georgia	232	66	28.4	21.1	0.0	7.3	0.4	0.0	6.0	0.9	0.0	
Guam	3	2	66.7	0.0	0.0	66.7	0.0	0.0	0.0	33.3	33.3	
Hawaii	35	2	5.7	0.0	0.0	5.7	0.0	0.0	0.0	5.7	0.0	
Idaho	148	5	3.4	0.7	0.0	2.7	0.0	2.0	0.0	0.7	0.0	
Illinois	1,132	279	24.6	4.4	0.0	20.2	6.6	1.1	5.7	3.8	3.0	
Indiana	499	98	19.6	6.4	0.0	13.2	5.8	2.6	3.2	1.4	0.2	
Iowa	480	13	2.7	0.0	2.5	0.2	0.0	0.2	0.0	0.0	0.0	
Kansas	400	21	5.3	0.0	4.8	0.5	0.3	0.3	0.0	0.0	0.0	
Kentucky	189	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Louisiana	113	19	16.8	2.7	0.0	14.2	0.0	8.8	0.9	2.7	1.8	
Maine	189	1	0.5	0.0	0.0	0.5	0.0	0.5	0.0	0.0	0.0	
Maryland	73	15	20.5	12.3	2.7	5.5	0.0	0.0	0.0	1.4	4.1	
Massachusetts	429	84	19.6	0.0	7.0	12.6	3.7	7.7	0.2	0.9	0.0	
Michigan	882	316	35.8	0.5	0.2	35.1	0.6	27.6	5.7	0.9	0.5	
Minnesota	697	65	9.3	2.9	4.4	2.0	0.3	1.0	0.0	0.7	0.0	
Mississippi	785	200	25.5	3.3	15.8	6.4	1.1	2.9	0.1	0.6	1.5	
Missouri	197	3	1.5	0.5	0.0	1.0	0.0	0.5	0.0	0.0	0.5	
Montana	241	5	2.1	0.4	0.0	1.7	0.0	0.0	0.0	1.7	0.0	
Nebraska	378	27	7.1	0.0	6.1	1.1	0.0	0.0	0.0	1.1	0.0	
Nevada	32	4	12.5	0.0	6.3	6.3	6.3	0.0	0.0	0.0	0.0	
New Hampshire	100	39	39.0	1.0	37.0	1.0	0.0	1.0	0.0	0.0	0.0	
New Jersey	697	417	59.8	1.6	39.3	18.9	2.6	5.7	0.0	10.3	0.3	

State	Number of SFAs in the State	Number of SFAs Using FSMCs <sup>1</sup>	Percentage of Total SFAs in the State Using FSMCs	Percentage Using Local Companies	Percentage Using Regional Companies	Percentage Using National Companies	National Companies				
							Percentage Using Aramark	Percentage Using Chartwells	Percentage Using Preferred Meal Systems	Percentage Using Sodexo	Percentage Using Other National Companies
New Mexico	220	43	19.5	3.2	15.9	0.5	0.0	0.0	0.0	0.5	0.0
New York	1,105	182	16.5	3.4	4.4	8.6	4.9	1.8	0.5	1.4	0.0
North Carolina	162	16	9.9	0.0	0.0	9.9	0.6	1.2	7.4	0.6	0.0
North Dakota	215	1	0.5	0.0	0.0	0.5	0.0	0.0	0.0	0.0	0.5
Ohio	1,222	97	7.9	0.4	2.1	5.4	1.6	1.6	0.8	1.5	0.0
Oklahoma	574	34	5.9	0.0	0.0	5.9	0.0	0.2	0.0	3.1	2.6
Oregon	245	35	14.3	0.0	0.0	14.3	0.0	4.5	0.0	9.8	0.0
Pennsylvania	853	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Puerto Rico	38	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhode Island	54	40	74.1	0.0	5.6	68.5	29.6	20.4	0.0	18.5	0.0
South Carolina	106	42	39.6	0.0	19.8	19.8	0.9	8.5	3.8	6.6	0.0
South Dakota	211	32	15.2	3.8	10.9	0.5	0.0	0.0	0.0	0.5	0.0
Tennessee	201	13	6.5	2.0	2.5	2.0	0.5	0.0	1.5	0.0	0.0
Texas	1,259	127	10.1	0.2	2.1	7.8	4.0	2.4	0.0	1.4	0.0
Utah	85	2	2.4	0.0	0.0	2.4	0.0	0.0	0.0	2.4	0.0
Vermont	226	33	14.6	0.0	13.3	1.3	0.0	0.0	0.0	1.3	0.0
Virgin Islands	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Virginia	161	10	6.2	0.0	0.0	6.2	1.2	1.2	0.0	3.1	0.6
Washington	327	64	19.6	1.8	0.0	17.7	0.9	9.5	0.0	7.3	0.0
West Virginia	73	2	2.7	0.0	0.0	2.7	2.7	0.0	0.0	0.0	0.0
Wisconsin	848	80	9.4	0.0	5.1	4.4	1.1	1.9	0.0	0.5	0.9
Wyoming	58	3	5.2	0.0	0.0	5.2	0.0	3.4	0.0	1.7	0.0
<b>Total</b>	<b>19,014</b>	<b>2,971</b>	<b>15.6</b>	<b>1.8</b>	<b>4.4</b>	<b>9.4</b>	<b>1.7</b>	<b>3.1</b>	<b>1.0</b>	<b>2.2</b>	<b>1.3</b>

<sup>1</sup> The number of SFAs using FSMCs is the cumulative number of SFAs using local, regional, and national companies per State.

Source: State CN Director Survey SY 2013–14, question C.8.

TABLE D.22 Among States With Schools That Used FSMCs, the Percentage of Schools Using FSMCs, by State, SY 2013–14

State	Number of Schools in the State	Number of Schools Using FSMCs <sup>1</sup>	Percentage of Total Schools in the State Using FSMCs	Percentage Using Local Companies	Percentage Using Regional Companies	Percentage Using National Companies	National Companies					
							Percentage Using Aramark	Percentage Using Chartwells	Percentage Using Preferred Meal Systems	Percentage Using Sodexo	Percentage Using Other National Companies	
Alabama	1,467	12	0.8	0.3	0.0	0.5	0.3	0.0	0.0	0.0	0.0	0.2
Alaska	448	39	8.7	2.0	0.0	6.7	0.0	0.0	0.0	0.0	6.5	0.2
Arizona	1,728	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Arkansas	1,120	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
California	14,055	828	5.9	0.6	0.2	5.1	0.3	0.2	0.0	0.0	3.1	1.6
Colorado	1,880	132	7.0	0.2	0.8	6.0	1.0	3.1	0.0	0.0	2.0	0.0
Connecticut	1,043	366	35.1	0.2	10.3	24.6	1.1	11.6	0.0	0.0	12.0	0.0
Delaware	226	13	5.8	1.8	0.9	3.1	0.0	0.0	0.9	0.0	0.4	1.8
DC	230	224	97.4	22.6	0.0	74.8	0.0	42.6	3.9	0.0	0.0	28.3
Florida	3,476	364	10.5	0.1	1.0	9.3	0.0	6.0	0.0	0.0	2.6	0.7
Georgia	2,332	188	8.1	2.1	0.0	6.0	0.9	0.0	0.6	0.0	4.4	0.0
Guam	44	37	84.1	0.0	0.0	84.1	0.0	0.0	0.0	0.0	77.3	6.8
Hawaii	310	2	0.6	0.0	0.0	0.6	0.0	0.0	0.0	0.0	0.6	0.0
Idaho	656	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Illinois	4,289	2,035	47.4	3.3	0.0	44.2	21.1	1.7	10.4	0.0	7.0	4.1
Indiana	2,082	277	13.3	1.9	0.0	11.4	4.2	3.7	1.1	0.0	2.4	0.0
Iowa	1,426	44	3.1	0.0	2.6	0.5	0.0	0.5	0.0	0.0	0.0	0.0
Kansas	1,527	108	7.1	0.0	6.4	0.7	0.1	0.7	0.0	0.0	0.0	0.0
Kentucky	1,547	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Louisiana	1,593	84	5.3	0.4	0.0	4.9	0.0	2.2	0.1	0.0	0.6	2.0
Maine	601	1	0.2	0.0	0.0	0.2	0.0	0.2	0.0	0.0	0.0	0.0
Maryland	1,558	33	2.1	0.8	0.1	1.2	0.0	0.0	0.0	0.0	1.0	0.2
Massachusetts	1,995	596	29.9	0.0	9.4	20.5	5.9	8.6	1.4	0.0	4.7	0.0
Michigan	3,524	4	0.1	0.1	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Minnesota	2,054	198	9.6	2.0	2.6	5.1	0.8	3.3	0.0	0.0	1.0	0.0
Mississippi	2,398	939	39.2	1.6	22.3	15.2	5.3	6.3	0.0	0.0	2.5	1.1
Missouri	955	12	1.3	0.1	0.0	1.2	0.0	1.0	0.0	0.0	0.0	0.1
Montana	760	54	7.1	0.4	0.0	6.7	0.0	0.0	0.0	0.0	6.7	0.0
Nebraska	916	156	17.0	0.0	10.2	6.9	0.0	0.0	0.0	0.0	6.9	0.0
Nevada	597	210	35.2	0.0	17.6	17.6	17.6	0.0	0.0	0.0	0.0	0.0
New Hampshire	455	121	26.6	0.2	25.5	0.9	0.0	0.9	0.0	0.0	0.0	0.0
New Jersey	2,540	1,798	70.8	1.1	32.0	37.7	6.6	15.4	0.0	0.0	14.9	0.8
New Mexico	934	36	3.9	0.0	0.0	3.9	0.0	0.0	0.0	0.0	3.9	0.0

State	Number of Schools in the State	Number of Schools Using FSMCs <sup>1</sup>	Percentage of Total Schools in the State Using FSMCs	Percentage Using Local Companies	Percentage Using Regional Companies	Percentage Using National Companies	National Companies				
							Percentage Using Aramark	Percentage Using Chartwells	Percentage Using Preferred Meal Systems	Percentage Using Sodexo	Percentage Using Other National Companies
New York	5,592	944	16.9	1.9	6.4	8.6	5.4	1.5	0.1	1.6	0.0
North Carolina	2,634	141	5.4	0.0	0.0	5.4	0.3	4.3	0.5	0.3	0.0
North Dakota	404	1	0.2	0.0	0.0	0.2	0.0	0.0	0.0	0.0	0.2
Ohio	3,765	352	9.3	0.2	2.2	7.0	2.0	2.6	0.3	2.1	0.0
Oklahoma	1,821	395	21.7	0.0	0.0	21.7	0.0	4.4	0.0	14.4	2.9
Oregon	1,252	403	32.2	0.0	0.0	32.2	0.0	7.5	0.0	24.7	0.0
Pennsylvania	3,554	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Puerto Rico	51	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhode Island	321	315	98.1	0.0	0.9	97.2	32.4	19.9	0.0	44.9	0.0
South Carolina	1,168	459	39.3	0.0	19.3	20.0	0.8	7.3	0.3	11.6	0.0
South Dakota	837	105	12.5	2.5	9.7	0.4	0.0	0.0	0.0	0.4	0.0
Tennessee	1,790	24	1.3	0.5	0.3	0.6	0.4	0.0	0.2	0.0	0.0
Texas	8,075	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Utah	879	116	13.2	0.0	0.0	13.2	0.0	0.0	0.0	13.2	0.0
Vermont	388	115	29.6	0.0	26.5	3.1	0.0	0.0	0.0	3.1	0.0
Virgin Islands	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Virginia	1,964	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Washington	2,021	480	23.8	0.3	0.0	23.5	0.1	9.6	0.0	13.7	0.0
West Virginia	716	2	0.3	0.0	0.0	0.3	0.3	0.0	0.0	0.0	0.0
Wisconsin	2,634	8	0.3	0.0	0.0	0.3	0.3	0.0	0.0	0.0	0.0
Wyoming	329	28	8.5	0.0	0.0	8.5	0.0	3.6	0.0	4.9	0.0
<b>Total</b>	<b>100,961</b>	<b>12,799</b>	<b>12.7</b>	<b>0.7</b>	<b>3.0</b>	<b>9.0</b>	<b>2.1</b>	<b>2.3</b>	<b>0.6</b>	<b>3.3</b>	<b>0.6</b>

<sup>1</sup> The number of schools using FSMCs is the cumulative number of schools using local, regional, and national companies per State.

Source: State CN Director Survey SY 2013–14, question C.8.

TABLE D.23 *Vendors of State Agencies That Reported the Ways That They Developed and Managed Their Standardized, Computer-Based Reporting Systems, by Type of Staff, SY 2013–14*

<b>Name of the Vendor or Contractor Company that Developed/Managed the System:</b>	<b>Number</b>
Colyar Consulting Group	20
Dynamic Internet Solutions	8
Hupp	2
Cybersoft Technologies	2
CyberSoft PrimeroEdge	1
Collier	1
Florida Automated Nutrition System: Image API and Kyra	1
Florida Direct Certification System: ArnAmy	1
Capital Strategies	1
Ashbaugh Associates	1
Levi, Ray, & Schoup (LRS)	1
Ciber	1
Northrop Grumman	1
Oracle	1
Web-Cow Inc.	1
Integra International	1

**Source:** State CN Director Survey, question D7a.