

To: Chair, Paul G. Pinsky, Vice-Chair Cheryl C. Kagan, Education, Health and Environmental Affairs Committee

From: Susan M. Gross, PhD, MPH, RD

Re: Support for Senate Bill 828

Date: February 18, 2020

My name is Susan Gross. I am a nutritionist and an associate scientist at the Johns Hopkins Bloomberg School of Public Health, and I support Senate Bill 828. This bill will ensure the continued success of the summer food service program in Maryland in providing children with healthy summer meals.

The Summer Food Service Program (SFSP) is a federally funded program that allows sponsors to provide youth (ages 18 and under) in low-income areas with free nutritious meals and snacks during the months of June, July, and August. Meals and snacks are served at sponsor sites which can be located at schools, community centers, faith-based organizations, local libraries, recreation centers, and other community spaces. In 2018, 1,632,610 summer meals were served in Maryland at 1,218 sites with 59,645 average daily meals served.¹ Increased childhood food insecurity in summer has been linked to limited access to government-sponsored meals programs.² Free summer meals help families stretch their food budgets throughout the summer months, decreasing their risk of food insecurity³ and strengthening summer recreation and enrichment programs. Additionally, summer meals can improve child nutrition, as reimbursable summer meals must meet federal nutrition standards and provide an opportunity for children to access fresh fruits, vegetables, and whole grains. A review of summer weight gain in school-aged children suggests that the SFSP could prevent the more than two-fold weight gain observed during the summer, which is observed disproportionately in African American, Hispanic, and overweight children.^{4,5} SFSP sponsors must meet a myriad of requirements to receive federal funding, but prior to 2019, federal waivers assisted sponsors by removing some of the most burdensome requirements. A recent internal audit by the United States Department of Agriculture (USDA) led to the decision by USDA to rescind six individual waivers, effective summer 2019. Rescinding these six waivers reinstated program requirements upon all sponsors across the country, including: obligatory first week site visits, removal of the “offer versus serve” option, imposed meal service time requirements, and removal of area eligibility for closed-enrolled sites. The implementation of these reinstated requirements has impacted SFSP participation in Maryland.⁶

As a public health professional, I recognized that the rescission of the six individual waivers for SFSP sponsor could impact the operations of SFSP sponsors and the provision of summer meals. Therefore, in collaboration with Maryland Hunger Solutions and the Lerner Center, an impact evaluations study was conducted in 2019. This study had three aims: 1) To evaluate the impact of USDA Summer Food Service Program (SFSP) waiver regulations change by comparing Maryland summer meal participation rates by comparing before and after the waivers were rescinded; 2) To examine the awareness and perceived impact of the rescission of six waivers on Maryland SFSP 2018 sponsors; and 3) To investigate the effects of waiver regulations on the experiences among a diverse group of Maryland summer meal sponsors.

From 2018 to 2019, the total number of SFSP meals served in Maryland declined by 43,066 meals, the average daily participation (ADP) declined by -79 meals. The preliminary data analysis suggests impact on sponsor operations and a decline in meal participation especially for breakfast (-17,997) and supper (-19,613) meals served. (See Tables 1-3 and Figures A-C). Another impact experienced across the state was the closure of SFSP sites with many of the sites that closed being in rural areas as exhibited Figure D's map of Maryland SFSP sites. Sponsors who were non-profit, religious or higher education organizations were more likely to experience a 10% or more decline in total number of meals served than SFSP sponsors from public school authorities (62% versus 12%; See Table 3).

A cross-sectional survey was used to collect data to explore sponsors' awareness and perceived impact of the six rescinded waivers on their operations and meal participation. All 43 SFSP 2018 sponsors were invited to complete an online survey in July 2019. Twenty-nine surveys were completed (68% response rate). Although, most sponsors reported familiarity with the six waivers, 11 sponsors (37.9%) were not familiar with most of the waivers and two sponsors were not familiar with any of the waivers. Overall, it was found that the majority of SFSP sponsors in Maryland (65%) had some type of impact on their program from the rescission of the waivers. Some sponsors had to drop meals like breakfast or supper because they could not get them both done within the time constraints imposed without the waiver, others closed sites because the site did not want to be an open site and the process of proving eligibility criteria was too time consuming. Also, we found out that the site visits required them to either hire more staff or decrease meals served because staffing was diverted for that activity. Only three SFSP sponsors applied for a waiver in 2019. Sponsors reported the following perceived impacts of the rescission of the waivers on their SFSP operations: increased workload for staff (68.%), increased spending to continue SFSP meal service in 2019 (52.2%), need to hire additional staff (39.1%), need to cut meals from sites due to timing regulations (38.1%), decrease in number of meals served (40.0%), and decrease number of sites (20.0%) (See 2018 Maryland Summer Meals Sponsor Waiver Survey Report attached). Although some SFSP sponsors did not see a change in the number of summer meals served, they still felt the impact of having to adjust operations to meet the regulations which required more staff, time and money.

Through the course of this study, there were multiple instances in which SFSP sponsors have reiterated the importance of the work being done to look at the impact of the waiver rescission in Maryland. During the in-depth interview phase, a total of 12 sponsors were interviewed. Three of these organizations had applied for and received waivers for summer 2019, while the remainder had not requested waivers and instead made changes to their program to adapt to the new regulations. We learned from sponsors that many of them did not have sufficient information about the rescinded waivers or the application process, with one sponsor remarking that they did not realize that new regulations would be in place until after the submission deadline had already passed. Several other sponsors did not have the capacity to apply for waivers because of their limited staffing, which in several cases, was limited to a single individual responsible for managing all summer programming. Among the sponsors who applied for waivers, one had not been notified by the state about reporting requirements that needed to be submitted by December 2019 in order to reapply for waivers for summer of 2020. However, because of the data collected during the in-depth interviews from other sponsor agencies, Maryland Hunger Solutions was able to disseminate this important information and ensure that all sponsors were aware and able to submit their reports and 2020 waiver requests by the given deadline. The consequences of not submitting the required report would have been a loss in the sponsor's ability to apply for waivers in 2020 and possibly a loss in eligibility for all closed enrolled sites and sites with multiple programs.

The opinions expressed herein are my own and do not necessarily reflect the views of The Johns Hopkins University.

Thank you for the opportunity to submit testimony.

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Table 1. Maryland Free Summer Food Service Program, agencies, sites and meals served from 2016 to 2019,

	# Sponsors (n)	Total Reported Site	Breakfast	Lunch	Supper	Snack (AM+PM+EV)	Total Meals	ADP
2016	46	1,496	1,176,324	1,661,176	103,149	34,498	2,975,147	73,744
2017	44	1,412	1,288,913	1,857,184	30,799	45,659	3,222,555	69,022
2018	44	1,387	1,221,207	1,776,609	45,800	57,421	3,101,037	71,363
2019	43	1,388	1,203,210	1,774,919	26,187	53,655	3,057,971	71,284

Table 2. Absolute and percent changes of number of sites, total meals, breakfasts, and suppers served from 2018-2019 for ALL Maryland SFSP sponsors (n=44), Sorted by Change in percent 2018-2019 number of sites .

Sponsor	2018				2019				Change in number 2018-2019				Change in percent 2018-2019			
	Total sites	Total meals	Breakfast	Supper	Total sites	Total meals	Breakfast	Supper	Sites	Total meals	Breakfast	Supper	Sites	Total meals	Breakfast	Supper
FAMILY LEAGUE OF BALTIMORE CITY INC	1	220	110	0	0	0	0	0	-1	-220	-110	0	-100%	-100%	-100%	0%
TALBOT CO PUB SCH	5	16304	4883	0	3	14934	4002	0	-2	-1370	-881	0	-40%	-8%	-18%	0%
ARCHDIOCESE OF BALTIMORE	3	7056	1935	0	2	6279	1915	0	-1	-777	-20	0	-33%	-11%	-1%	0%
CHARLES CO BRD OF ED	23	18795	1652	0	17	18493	416	0	-6	-302	-1236	0	-26%	-2%	-75%	0%
CITY OF FREDERICK SUPERVISOR FINANCE DEPT	12	8528	0	0	10	5654	0	0	-2	-2874	0	0	-17%	-34%	0%	0%
GARRETT CO PUB SCH	16	13469	4163	0	14	12675	3202	0	-2	-794	-961	0	-13%	-6%	-23%	0%
PRINCE GEORGE'S CO. PUBLIC SCHOOL	181	356484	140451	0	166	345592	138657	0	-15	-10892	-1794	0	-8%	-3%	-1%	0%
CAPITAL AREA FOOD BANK	26	40233	12586	15524	24	18173	5747	7627	-2	-22060	-6839	-7897	-8%	-55%	-54%	-51%
WASHINGTON CO PUB SCH	44	87443	31806	0	41	78488	27904	0	-3	-8955	-3902	0	-7%	-10%	-12%	0%
WORCESTER CO BRD OF ED	18	18479	4930	0	17	22461	7552	0	-1	3982	2622	0	-6%	22%	53%	0%
FREDERICK CO PUB SCH	20	34658	12241	0	19	37460	13600	0	-1	2802	1359	0	-5%	8%	11%	0%
CITY OF BALTIMORE (DHCD)	325	673291	301344	0	314	572989	253557	0	-11	-100302	-47787	0	-3%	-15%	-16%	0%
ANNE ARUNDEL CO PUB SCH	61	102647	28262	1008	59	95821	23391	975	-2	-6826	-4871	-33	-3%	-7%	-17%	-3%
MARYLAND FOOD BANK	62	129857	58748	0	60	152872	73765	0	-2	23015	15017	0	-3%	18%	26%	0%
SOMERSET CO PUB SCH	5	6353	2487	921	5	12689	5431	667	0	6336	2944	-254	0%	100%	118%	-28%
BOYS SCHOOL OF ST PAUL	2	4894	2447	0	2	7102	3636	0	0	2208	1189	0	0%	45%	49%	0%
BNOS YISROEL OF BALTIMORE INC	9	43655	0	0	9	52256	0	0	0	8601	0	0	0%	20%	0%	0%
CITY OF CUMBERLAND	3	10639	0	0	3	11605	0	0	0	966	0	0	0%	9%	0%	0%
ALLEGANY CO PUB SCH	4	2834	315	0	4	2991	143	0	0	157	-172	0	0%	6%	-55%	0%
KENT CO BRD OF ED	3	9766	4533	0	3	10112	4290	0	0	346	-243	0	0%	4%	-5%	0%
UNIV OF MD COLLEGE PARK	1	3678	1332	1010	1	3685	1342	1048	0	7	10	38	0%	0%	1%	4%
DORCHESTER CO BOARD OF ED	9	17998	8395	0	9	16851	7547	0	0	-1147	-848	0	0%	-6%	0%	0%
QUEEN ANNES CO BD OF ED	6	10243	5281	0	6	9300	4844	0	0	-943	-437	0	0%	-9%	-8%	0%
SEED SCHOOL OF MARYLAND	1	3584	1659	0	1	3245	1504	0	0	-339	-155	0	0%	-9%	-9%	0%
ST MARYS CO PUB SCH	7	12066	4434	0	7	10650	3820	0	0	-1416	-614	0	0%	-12%	-14%	0%
FROSTBURG STATE UNIV UPWARD BD	1	2312	825	635	1	1887	749	309	0	-425	-76	-326	0%	-18%	-9%	-51%
CCBC DUNDALK UPWARD BOUND	1	295	0	0	1	237	0	0	0	-58	0	0	0%	-20%	0%	0%
PRINCE GEORGES COMM COLLEGE	1	1453	578	0	1	1142	494	0	0	-311	-84	0	0%	-21%	-15%	0%
SAINT FRANCIS INTERNATIONAL SCHOOL	2	6158	2359	0	2	4667	1842	0	0	-1491	-517	0	0%	-24%	-22%	0%
ALLEGANY CO HUMAN RESOURCES	1	2580	1416	0	1	1480	741	0	0	-1100	-675	0	0%	-43%	-48%	0%
UNIV OF MD BALT CO UPWARD BND	1	4776	1744	1295	1	2331	858	615	0	-2445	-886	-680	0%	-51%	-51%	-53%
MARYLAND SALEM CHILDRENS TRUST	1	971	58	0	1	389	0	0	0	-582	-58	0	0%	-60%	-100%	0%
EAST JOHN YOUTH CENTER	1	2165	1040	0	1	638	319	0	0	-1527	-721	0	0%	-71%	-69%	0%
BALTIMORE CITY PUB SCH	117	386141	154350	0	119	400108	161101	0	2	13967	6751	0	2%	4%	4%	0%
MONTGOMERY CO PUB SCH	118	474509	204723	1570	123	478156	203143	502	5	3647	-1580	-1068	4%	1%	-1%	-68%
HARFORD CO PUB SCH	36	76462	28682	0	38	72734	26101	0	2	-3728	-2581	0	6%	-5%	-9%	0%
BALTIMORE CO PUB SCH	131	249098	116353	0	139	268927	129300	0	8	19829	12947	0	6%	8%	11%	0%
WICOMICO CO BRD OF ED	23	36135	13841	0	25	41632	15934	969	2	5497	2093	969	9%	15%	15%	0%
ST VINCENT DE PAUL OF BALTIMORE INC.	57	108087	39268	23251	63	134259	54316	12640	6	26172	15048	-10611	11%	24%	38%	-46%
CAROLINE CO PUB SCH	10	16812	7317	394	12	15368	6093	816	2	-1444	-1224	422	20%	-9%	-17%	107%
HOWARD CO PUB SCH	18	66276	2033	0	23	67753	0	0	5	1477	-2033	0	28%	2%	-100%	0%
CALVERT CO PUB SCH	2	4132	1978	0	3	4473	2028	0	1	341	50	0	50%	8%	3%	0%
CECIL CO PUB SCH	14	24448	8727	0	23	30431	10914	0	9	5983	2187	0	64%	24%	25%	0%
CARROLL CO PUB SCH	5	5053	1921	192	15	8982	3012	19	10	3929	1091	-173	200%	78%	57%	-90%
Overall	1387	3101037	1221207	45800	1388	3057971	1203210	26187	1	-43066	-17997	-19613	0%	-1%	-1%	-43%

Table 3. Percent change in total number of meals served by Maryland SFSP sponsor characteristics (n=29)

Characteristic	N (%)	Change < -10% N = 8 N (%)	Change > 10% N= 7 N (%)	No change (ref) N= 14 N (%)	p-value (Fisher's exact test)
Type of sponsor					
Public school food authority	17 (58.6)	1 (12.5)	4 (57.1)	12 (85.7)	0.003
Government agency	3 (10.3)	2 (25.0)	0 (0.0)	1 (7.1)	
Nonprofit organization & other	9 (31.0)	5 (62.5)	3 (42.9)	1 (7.1)	
Number of sites					
Less than 10 sites	13 (44.8)	6 (75.0)	2 (28.6)	5 (35.7)	0.46
11-50 sites	9 (31.0)	1 (12.5)	3 (42.8)	5 (35.7)	
51+ sites	7 (24.1)	1 (12.5)	2 (28.6)	4 (28.6)	
FY 2019 Employed Offer vs Serve					
Yes	15 (51.7)	4 (50.0)	3 (42.8)	8 (57.1)	0.89
No	14 (48.3)	4 (50.0)	4 (57.1)	6 (42.9)	
FY 2019 Open vs Closed sites available					
Closed only	5 (17.2)	4 (50.0)	0 (0.0)	1 (7.1)	0.03
Open only	7 (24.1)	0 (0.0)	1 (14.3)	6 (42.9)	
Both	17 (58.6)	4 (50.0)	6 (85.7)	7 (50.0)	

The Impact of Waivers on Summer Meal Participation in Maryland

Figures

Figure A. Maryland Summer Food Service Program (SFSP) Total meals served 2016-2019

Total number of meals served from 2016-2019

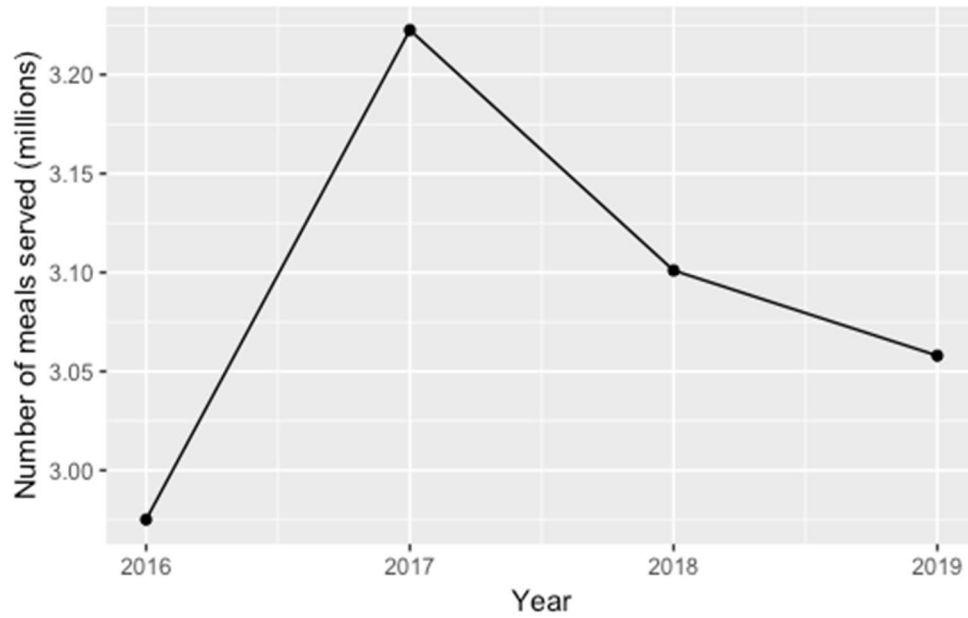


Figure B. Maryland Summer Food Service Program (SFSP) Breakfast meals served 2016-2019

Number of breakfasts served from 2016-2019

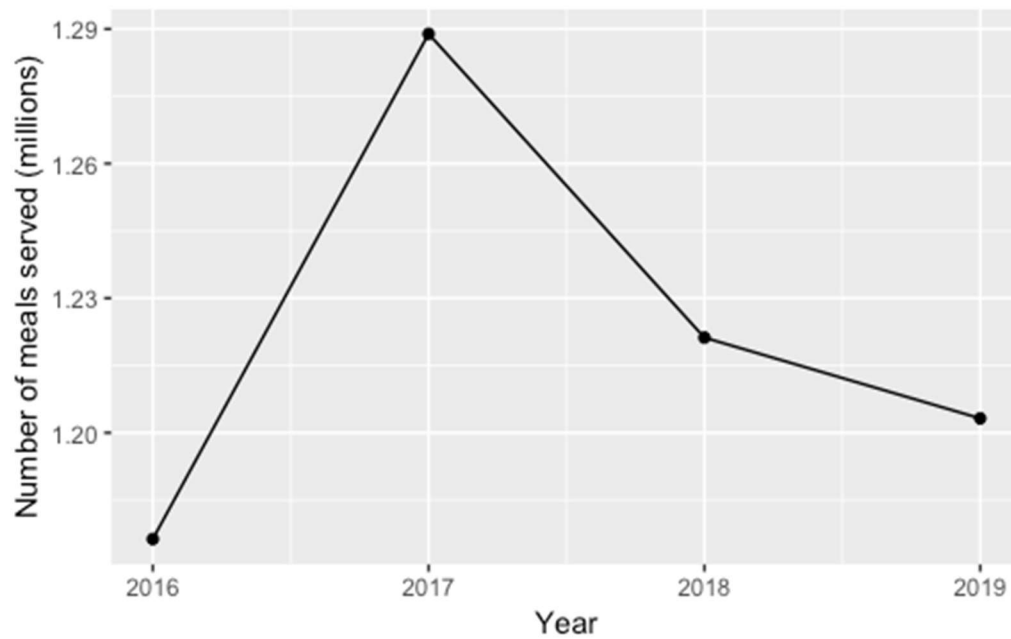


Figure C. Maryland Summer Food Service Program (SFSP) Supper meals served 2016-2019

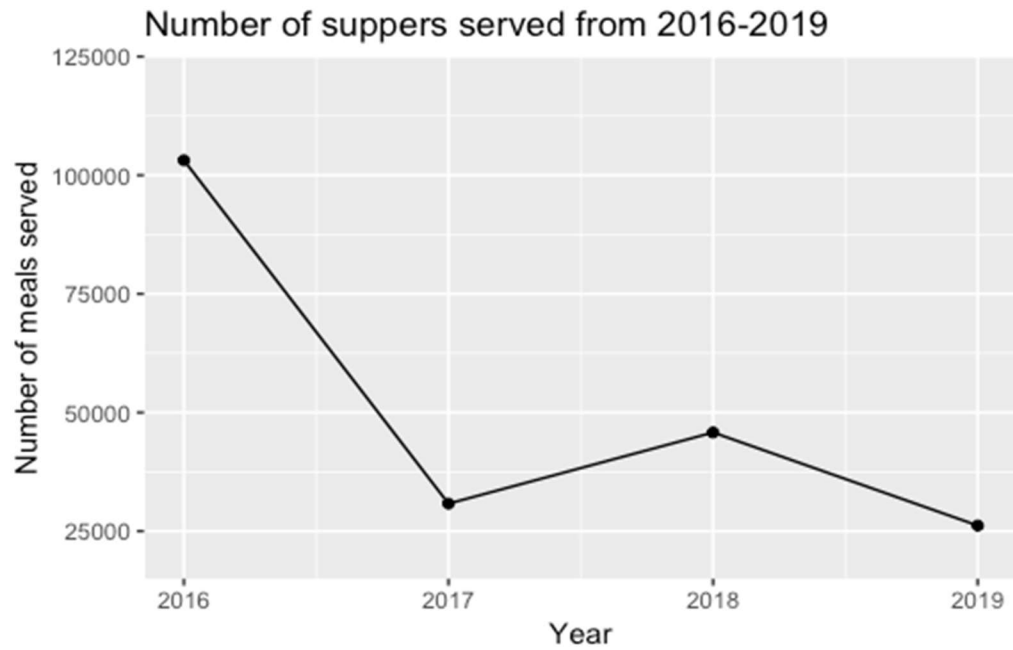
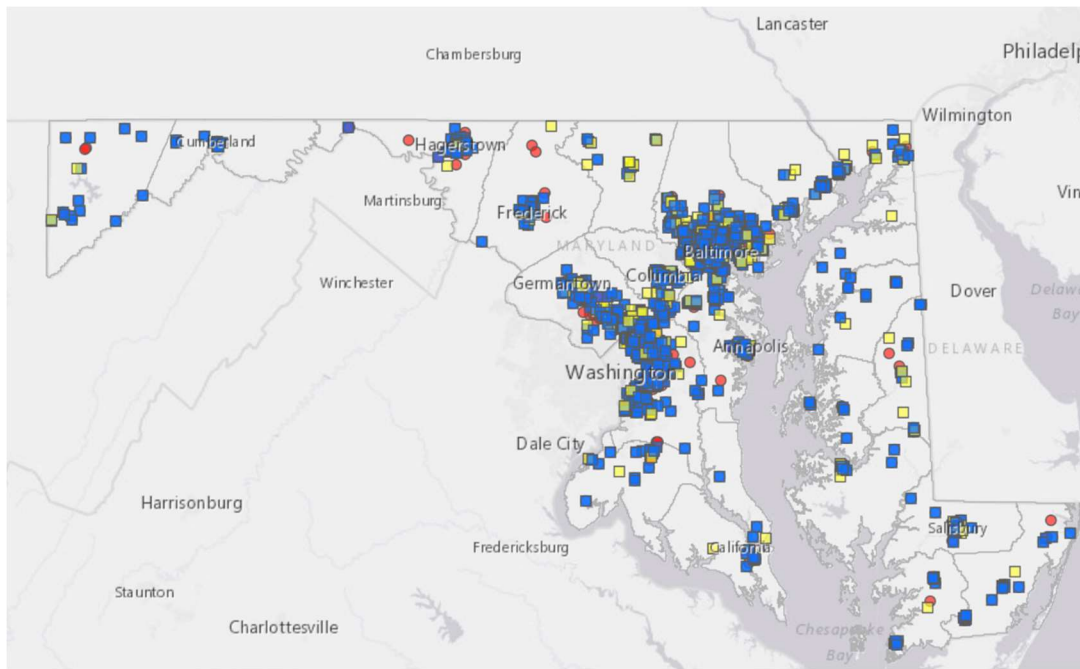


Figure D. Map of Maryland Summer Food Service Program (SFSP) Sites 2018-2019



Legend:

- | | |
|--|--|
| <ul style="list-style-type: none"> <input checked="" type="checkbox"/> 2018 Summer Meal Sites <input type="checkbox"/> Summer Meal Site <input type="checkbox"/> Summer Meal Site - Dropped | <ul style="list-style-type: none"> <input checked="" type="checkbox"/> 2019 Summer Meal Sites <input type="checkbox"/> Summer Meal Site <input type="checkbox"/> Summer Meal Site - New |
|--|--|

The Impact of Waivers on Summer Meal Participation in Maryland

Aim 2

**2018 Maryland Summer Meals Sponsor Waiver Survey
Report**

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2018 Maryland Summer Meals Sponsor Waiver Survey

Introduction

The Summer Food Service Program (SFSP) is a federally funded program that allows sponsors to provide youth (ages 18 and under) in low-income areas with free nutritious meals and snacks during the months of June, July, and August. Meals and snacks are served at sponsor sites which can be located at schools, community centers, faith-based organizations, local libraries, recreation centers, and other community spaces. In 2018, 1,632,610 summer meals were served in Maryland at 1,218 sites with 59,645 average daily meals served.¹ Increased childhood food insecurity in summer has been linked to limited access to government-sponsored meals programs.² Free summer meals help families stretch their food budgets throughout the summer months, decreasing their risk of food insecurity³ and strengthening summer recreation and enrichment programs. Additionally, summer meals can improve child nutrition, as reimbursable summer meals must meet federal nutrition standards and provide an opportunity for children to access fresh fruits, vegetables, and whole grains. A review of summer weight gain in school-aged children suggests that the SFSP could prevent the more than two-fold weight gain observed during the summer, which is observed disproportionately in African American, Hispanic, and overweight children.^{4,5} SFSP sponsors must meet a myriad of requirements to receive federal funding, but prior to 2019, federal waivers assisted sponsors by removing some of the most burdensome requirements. A recent internal audit by the United States Department of Agriculture (USDA) led to the decision by USDA to rescind six individual waivers, effective summer 2019. Rescinding these six waivers reinstated program requirements upon all sponsors across the country, including: obligatory first week site visits, removal of the “offer versus serve” option, imposed meal service time requirements, and removal of area eligibility for closed-enrolled sites. The implementation of these reinstated requirements may decrease the number of sponsors and SFSP participation in Maryland.⁶

The objective of this study was to examine the awareness and perceived impact of the rescission of six waivers on Maryland SFSP 2018 sponsors. A cross-sectional survey was used to collect data to explore sponsors’ decision-making process to apply for 2019 waivers, their perceptions of the waiver regulations changes, and compare process and outcome indicators of sponsors with waivers to sponsors without.

Methods

Participants and Recruitment

A list of all SFSP MD 2018 sponsors and contact information was provided by the Maryland State Department of Education. In July 2019, all 43 SFSP 2018 sponsors were invited by email to complete an online survey. The link to the 2019 online Qualtrics survey was included in the invitation. Reminders were sent to each sponsor weekly. In September 2019, sponsors who had not completed the survey were contacted by telephone inviting them to complete the survey. In November 2019, the Qualtrics survey was closed. Twenty-nine surveys were completed (68% response rate).

Measures

Sponsors provided data on characteristics such as type of sponsor (Public school food authority, Government agency, Nonprofit organization, higher education, or Other); Number of Sites, Number of Years a Sponsor, Ages of Children Served (Pre-K (Ages 0 - 3), Elementary School (Grades K - 5, Ages 4 - 10), Middle School (Grades 6 - 8, Ages 11 - 13), High School (Grades 9 -12, Ages 14 - 18)), Employed Offer vs Serve in FY 2018, and Open vs Closed Sites available in FY 2018.

Waiver Awareness

Sponsors were asked about their familiarity with each of the six rescinded waivers. They were asked, “Are you familiar with Waiver # 1 (Waives first-week site visits for successful returning sites)?”, “Are you familiar with Waiver # 2 (Waives first-week site visits for School Food Authority (SFA) sponsors in good standing)?”, “Are you familiar with Waiver # 3 (Waives requirement of Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) sponsors in good standing to conduct first-week site visits)?”, “Are you familiar with Waiver #4 (Policy of Offer vs. Serve is extended to non-SFA sponsors)?”, “Are you familiar with Waiver #5 (Waives meal-time requirements)?”, and “Are you familiar with Waiver #6 (Area eligibility is extended to closed enrolled sites)?” They were asked to check a box next to each waiver description if they were familiar. They were also given the option to check a box that stated, “Not familiar with any of these waivers.”

Sponsors were asked “Did you consider requesting any waivers this year?” with response categories “Yes” or “No”. Those who considered requesting a waiver were asked, “Did you request a waiver this year?” with response categories “Yes”, “No” and “I feel like I didn't need it.” Those who did not consider requesting a waiver were asked, “What were the reasons you chose not to request a waiver?” Response options were, “Unaware of need to request”, “Missed the deadline to request”, “Did not have the capacity to request” or “Other”. Those who indicated applying for a waiver were asked to specify each waiver for which they applied.

Perceived Waiver Impact

Perceived Waiver Impact—the study outcome variable—was measured using a six-item scale developed by the research team, which assessed the perception of impact on sponsor site operations. Sponsors were asked to rate the following statements on a scale of 1 (strongly disagree) to 7 (strongly agree): The regulation changes brought by this waiver repeal will increase the workload for my staff; The regulation changes brought by this waiver repeal will increase the amount of money my organization will need to spend to continue meal service in summer 2019; I will need to hire additional staff this summer because of program changes due to the loss of these waivers; I will need to cut meals (either breakfast, lunch, supper, or snack) from sites due to timing regulations; I will need to decrease the number of meals served at each site due to program changes and I will need

to decrease the number of sites we serve due to regulation changes. Although this scale has not been formally tested for validity, the Cronbach's alpha for reliability was 0.85.

The surveys were pilot-tested with former SFSP sponsors from Maryland who served multiple locations across the state. Pilot-testing revealed that the questions were easily understood by sponsors and the data were well distributed. Some small changes to wording and formatting of the survey were indicated and made prior to data collection.

Data Analysis

Data analysis included calculation of means, modes, standard deviation and frequency distributions (Table 1). Bivariate analysis using chi-squared for categorical variables and One-way ANOVA for continuous variables was conducted to compare distribution of sample characteristics by perceived impact (Table 2).

Results

The final sample for analysis was 29 SFSP 2018 Sponsors in Maryland. Data was collected during July and September of 2019. Sponsors provided meals throughout Maryland during 2019.

Sponsor Characteristics

The sponsors survey sample identified as 58.6% public school food authorities, 10.3% government agencies, and 20.7% nonprofit organizations, religious organizations or higher education. Many sponsors reported having less than 10 sites (44.8%), 31.0% reported having 11-50 sites and 24.1% reported having more than 51 sites. Most sponsors had more than five years' experience as an SFSP sponsor (n=25, 89.3%) and over 80% of sponsors served meals to school-aged children (ages 4-18). However, only 59% serve meals to children 3 years old or less. The Offer versus Served option was employed at 51.7% of sponsors in in 2018 and most sponsors had both closed and open sites (58.6%), although 24.1% had only open sites and 17.2% had only closed sites in 2018 (Table 1).

Waiver Awareness

Sponsors were asked about their familiarity with the six USDA rescinded waivers. Twenty-six (89.7%) were familiar with Waiver # 1 (Waives first-week site visits for successful returning sites). Twenty-two (75.9%) were familiar with Waiver # 2 (Waives first-week site visits for School Food Authority (SFA) sponsors in good standing. Twenty (69.0%) were familiar with Waiver # 3 (Waives requirement of Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) sponsors in good standing to conduct first-week site visits). Twenty-three (79.3%) were familiar with Waiver #4 (Policy of Offer vs. Serve is extended to non-SFA sponsors), Waiver #5 (Waives meal-time requirements) and Waiver #6 (Area eligibility is extended to closed enrolled sites). Two sponsors (6.9%) reported not being familiar with any waivers and 11 sponsors (37.9%) were not familiar with most of the waivers.

When asked if they considered individually requesting a waiver for Summer 2019, only 5 sponsors (17%) reported considering such a request. For those who did not request the waiver, reasons for not requesting included being unaware of the need to request (16.6%), not having the capacity to request a waiver (25.0%), unaware of the impact of the waiver and lack of support from MSDE (29.2%) and did not feel they needed the waiver (29.2%) (Table 1).

Perceived impact of waivers

Sponsors reported the following perceived impacts of the rescission of the waivers on their SFSP operations: increased workload for staff (68.%), increased spending to continue SFSP meal service in 2019 (52.2%), need to hire additional staff (39.1%), need to cut meals from sites due to timing regulations (38.1%), decrease in number of meals served (40.0%), and decrease number of sites (20.0%). The total impact score for sponsors was 19.6 (11.5) (mean(sd)) with a range of (8-37). Nineteen sponsors (65.5%) agreed with at least one impact item and twelve sponsors (41.4%) agreed with at least three impact items (Table 1).

Perceived impact of waivers, characterized by agreement with three or more impact items, was analyzed by sponsor characteristics. Sponsors with more than 51 sites were more likely to perceive an impact compared to sponsors with a smaller number of sites (50.0% vs 25.0%, $p=0.02$). There was no statistically significant difference in perceived impact by other sponsor characteristics, although sponsors who had both open and closed sites in 2018 trended towards having higher perceived impact than sites with open sites only (75.0% vs 16.7%). Future analyses examine the perceived impact scale and sponsor characteristics as well as using data on meal participation from MSDE an perceived impact of waivers.

Discussion

The preliminary data analysis suggests impact on sponsor operations (65% reported an impact on their program). Some sponsors may have dropped meals like breakfast or supper because they could not get them both done within the time constraints imposed without the waiver, others may have closed sites because the site did not want to be an open site and the process of proving eligibility criteria was too time consuming. Also, we found out that the site visits required sponsors to either hire more staff or decrease meals served because staffing was diverted for that activity. Most concerning is the reported amount of impact of the waiver rescission by 2018 SFSP Sponsors and the fact that MDSE has decided not to apply for state waivers for Summer 2020. The current SFSP sponsors will need support to apply for individual waivers or adjust their operations.

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Table 1. Sponsor Characteristics, Waiver Awareness and Perceived Impact of Waiver Rescission (n=29)

Characteristic	N	% or mean (sd)
Type of Sponsor		
Public school food authority	17	58.6
Government agency	3	10.3
Nonprofit organization	6	20.7
Other	3	10.3
Number of Sites	29	37.8 (65.5)
Less than 10 sites	13	44.8
11-50 sites	9	31.0
51+ sites	7	24.1
Number of Years a Sponsor (n=28)		
1-2 previous years	1	3.4%
3-5 previous years	2	7.1%
More than 5 previous years	25	89.3%
Ages of Children Served		
Pre-K (Ages 0 - 3)	17	58.6%
Elementary School (Grades K - 5, Ages 4 - 10)	24	82.8%
Middle School (Grades 6 - 8, Ages 11 - 13)	25	86.2%
High School (Grades 9 -12, Ages 14 - 18)	28	96.6%
FY 2018 Employed Offer vs Serve		
Yes	15	51.7%
FY 2018 Open vs Closed Sites available		
Closed only	5	17.2%
Open only	7	24.1%
Both	17	58.6%
Awareness of Waivers		
Waiver # 1 (Waives first-week site visits for successful returning sites)	26	89.7
Waiver # 2 (Waives first-week site visits for School Food Authority (SFA) sponsors in good standing)	22	75.9
Waiver # 3 (Waives requirement of Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) sponsors in good standing to conduct first-week site visits)	20	69.0
Waiver #4 (Policy of Offer vs. Serve is extended to non-SFA sponsors)	23	79.3
Waiver #5 (Waives meal-time requirements)	23	79.3
Waiver #6 (Area eligibility is extended to closed enrolled sites)	23	79.3
Not familiar with any of these waivers	2	6.9
Familiar with at least 5 waivers	18	62.1%

Table 1. Sponsor Characteristics, Waiver Awareness and Perceived Impact of Waiver Rescission (n=29)

Waiver request activity Summer 2019		
Requested Waiver for 2019	5	17.2
Reasons for not Requesting Waivers for Summer 2019		
Unaware of need to request	4	16.6
Did not have the capacity to request	6	25.0
Unaware of impact/MSDE would not support it	7	29.2
No need for waiver	7	29.2
Impact of Waiver Rescission		
Impact items- Waiver repeal will (1-7 strongly disagree to strongly agree)		
Increase the workload for my staff	25	5.3 (1.9)
Any impact workload (score >4)	17	68.0%
Increase the amount of money my organization will need to spend to continue meal service in Summer 2019	23	5.0 (1.8)
Any impact spending (score >4)	12	52.2%
Need to hire additional staff this summer because of program changes due to the loss of these waivers	23	4.3 (2.1)
Any impact staffing (score >4)	9	39.1%
Need to cut meals (either breakfast, lunch, supper, or snack) from sites due to timing regulations	21	3.9 (2.2)
Any impact type of meals served (score >4)	8	38.1%
Decrease the number of meals served at each site due to program changes	20	3.8 (2.2)
Any impact number meals served (score >4)	8	40.0%
Decrease the number of sites we serve due to regulation changes	20	3.3 (2.1)
Any impact number of sites (score >4)	4	20.0%
Total impact score	29	19.6 (11.5)
Average impact score	25	4.6 (1.8)
Any impact (Any impact item >4)	19	65.5%
Three or more impact items	12	41.4%

Table 2 Sponsor Characteristics by Perceived Impact of Waivers for at least 3 impact items (n=29)

Characteristic	N	% or mean (sd)	Perceived Impact <3 items N=17	Perceived Impact ≥ 3 items N=12	p-value
Type of Sponsor					
Public school food authority	17	58.6	10 (58.8)	7 (58.3)	ns
Government agency	3	10.3	2 (11.8%)	1 (8.3%)	
Nonprofit organization & other	9	31.0	5 (29.4%)	4 (33.3%)	
Number of Sites					
Less than 10 sites	13	44.8	10 (58.8)	3 (25.0%)	0.02
11-50 sites	9	31.0	6 (35.3)	3 (25.0)	
51+ sites	7	24.1	1 (5.9)	6 (50.0)	
Number of Years a Sponsor (n=28)					
0-5 previous years	3	10.7%	1 (6.3)	2 (16.7)	
More than 5 previous years	25	89.3%	15 (93.8)	10 (83.3)	
Ages of Children Served					
Pre-K (Ages 0 - 3)	17	58.6%	9 (52.9)	8 (47.1)	ns
Elementary School (Grades K - 5, Ages 4 - 10)	24	82.8%	13 (54.2)	11 (45.8)	
Middle School (Grades 6 - 8, Ages 11 - 13)	25	86.2%	14 (56.0)	11 (44.0)	
High School (Grades 9 - 12, Ages 14 - 18)	28	96.6%	16 (57.1)	12 (42.9)	
FY 2018 Employed Offer vs Serve					
Yes	15	51.7%	8 (47.1)	7 (58.3)	ns
No	14	48.3%	9 (52.9)	5 (41.7)	
FY 2018 Open vs Closed Sites available					
Closed only	5	17.2%	4 (23.5)	1 (8.3)	ns
Open only	7	24.1%	5 (29.4)	2 (16.7)	
Both	17	58.6%	8 (47.1)	9 (75.0)	
Considered 2019 Waivers					
Yes	9	31.0%	3 (17.6)	6 (50.0)	
No	20	69.0%	14 (82.4)	6 (50.0)	