

A COVID-19 SPECIAL REPORT

D.C. Serves Grab & Go Meals Quickly, Efficiently During COVID-19

January 11, 2021

A report by the Office of the District of Columbia Auditor



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Executive Summary

Why ODCA Did this Audit

This audit replicates a similar study conducted by the New York City Independent Budget Office published in the July 2020, *Did NYC Open Grab & Go Sites in Areas With the Greatest Need?*. Given that the District’s public schools regularly serve over 1 million free and reduced-price meals per month during normal school year operations, we hoped to determine not only where the District opened sites for free meals during the COVID-19 public health emergency, but also how many meals were served at each site.

What ODCA Found

This audit found that the District’s meal sponsors moved quickly to open Grab & Go meal sites in areas of greatest need, but that their efforts could have been supported better by stronger coordination mandated by District leadership. Specifically, we found that 96% of at-risk students had access to at least one meal site located in their home neighborhood cluster in the first month of the COVID-19 pandemic—later growing to 99% by June—but some neighborhoods with many at-risk students could have had better access to meals sooner.

What ODCA Recommends

OSSE should actively monitor the locations of Grab & Go meal sites to ensure equitable access to meals during public emergencies and unanticipated school closures. Monitoring activities should include an evaluation of the walking distance to meal sites and recommendations for meal site locations when disparities are identified.

OSSE should also identify the most effective practices of its meal sponsors in reaching students in need during unanticipated school closures.

Background

The U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) administers federal child nutrition programs including the National School Lunch Program (NSLP), School Breakfast Program (SBP) and Summer Food Service Program (SFSP) authorized by the Richard B. Russell National School Lunch Act¹. Through NSLP and SBP, FNS reimburses School Food Authorities² (SFAs) for the number of breakfasts and lunches they serve during the school year. Similarly, through SFSP, FNS reimburses summer food providers, called “sponsors”, for the number of free meals served at summer meal sites. All meals served under the Summer Food Service Program (SFSP) are free. State education agencies monitor compliance with federal rules and process monthly claims for reimbursement.

FNS reimburses SFAs and sponsors for meals served at three income eligibility levels: free, reduced-price and paid. Free meals are for students with household incomes below 130% of the federal poverty level.³ Reduced-price meals are for students with household incomes below 185% of the federal poverty level.⁴ Paid meals are those served to students not eligible for free or reduced-price meals.⁵ The Community Eligibility Provision (CEP) allows schools to serve free meals to *all* students if greater than or equal to 40% of their previous year enrollment was certified to be from families participating in a means-tested program like Supplemental Nutrition Assistance Program (SNAP).

COVID-19 Public Health Emergency

On March 11, 2020, Mayor Bowser declared a public emergency⁶ and public health emergency⁷ instructing the City Administrator to determine, in consultation with other officials, whether public schools could operate safely during the coronavirus pandemic. The District of Columbia Public Schools (DCPS) system finished that week in-person, then began its scheduled two-week spring break before going virtual for the remainder of the spring semester. Public charter school Local Education Agencies (LEAs) followed a similar schedule.

The Families First Coronavirus Response Act⁸, signed on March 18, 2020, allowed USDA to waive requirements of its child nutrition programs. Within a week, USDA granted the following nationwide waivers to “support access to nutritious meals while minimizing potential exposure to the novel coronavirus [COVID-19]”:

- Meal Service Time Flexibility
- Non-congregate Feeding
- Meal Pattern Flexibility

1 79 P.L. 396, 60 Stat. 230.

2 School Food Authorities (SFAs) are governing bodies responsible for administering one or more schools.

3 Richard B. Russell National School Lunch Act, Section 9 (b)(1)(A); \$34,060 annual for a household of four in SY 2020-21.

4 Richard B. Russell National School Lunch Act, Section 9 (b)(1)(B); \$48,470 annual for a household of four in SY 2020-21.

5 Richard B. Russell National School Lunch Act, Section 12 (p) (1).

6 Mayor’s Order 2020-045.

7 Mayor’s Order 2020-046.

8 P.L. 116-127, Section 2202.

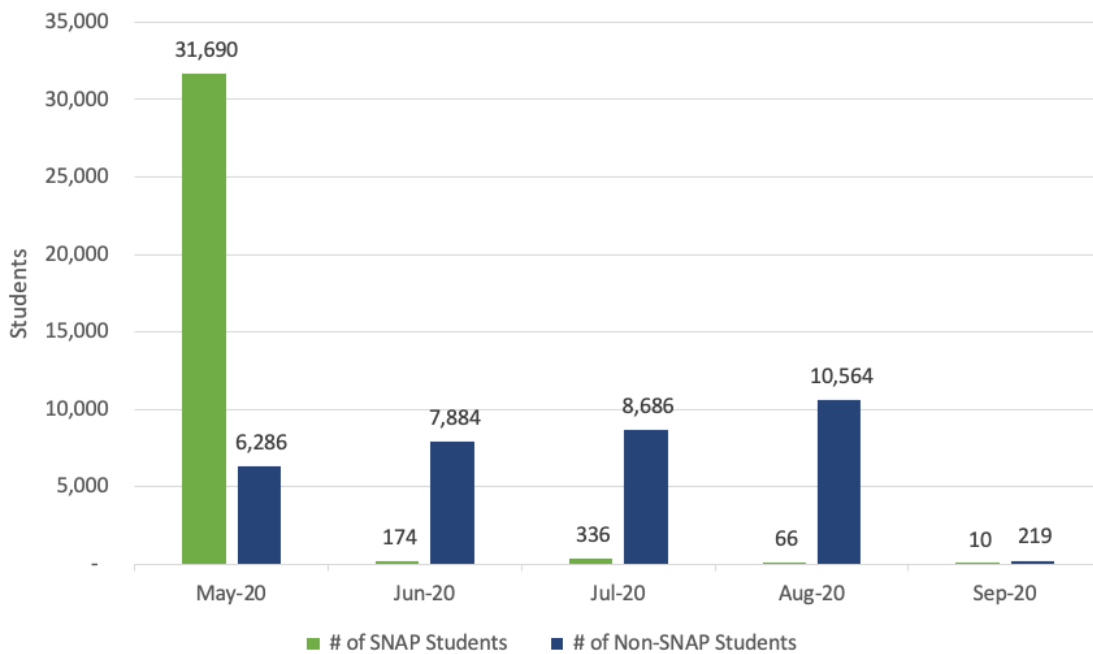
- Parents and Guardians to Pick Up Meals for Children

Collectively, these waivers allowed D.C. to open Grab & Go meal sites to operate under the unanticipated school closures that resulted from the coronavirus pandemic.

The Families First Coronavirus Response Act⁹ also authorized the Pandemic Electronic Benefits Transfer (P-EBT) program, which provided temporary SNAP benefits to families that would have been eligible for free or reduced-price meals in school. Eligible families received benefits equivalent to the SY 2019-20 NSLP reimbursement rate for lunch (\$3.50) and breakfast (\$2.20) for each day schools were closed (68 days), so a total of \$387.60 per child. All children who would have been eligible for free or reduced-price meals, if not for the school closures, were eligible for P-EBT, including those receiving meals through the Community Eligibility Provision (CEP) and those without existing SNAP benefits cards.

As shown in Figure 1 the District delivered benefits to households already in possession of a SNAP benefits card first in May, then made contact with a growing number of non-SNAP households through the remainder of the fiscal year. All told, District families received over \$25 million in benefits, representing 32,276 students in SNAP households and 33,639 students from non-SNAP households.

Figure 1: Number of Students Issued Pandemic EBT Benefits by SNAP Status and Month



Source: DHS-supplied records

The District also expanded access to food during the COVID-19 pandemic through other means, including grocery giveaways at DCPS schools, at-home deliveries for seniors, and meals for unsheltered individuals.

⁹ P.L. 116-127, Section 1101.

Objectives, Scope, and Methodology

Objectives

- Determine if the District opened Grab & Go meal sites in areas of greatest need.
- Determine how many reimbursable meals were served at each Grab & Go meal site during the COVID public health emergency.

Scope

This study includes data from March 16 to July 31, 2020 – four and a half months of the District’s COVID-19 public health emergency.

Methodology

To determine if the District opened Grab & Go meal sites in areas of greatest need we compared the locations of Grab & Go meal sites serving meals during our scope with data on where students considered at-risk of academic failure live. We used at-risk residency data for two reasons:

First, the at-risk designation is more narrowly tailored to socioeconomic need than eligibility for free or reduced-price meals. To be counted as at-risk a student must be direct certified¹⁰ as being at least one of the following: homeless, in the District’s foster care system, qualify for the Temporary Assistance for Needy Families (TANF) or the Supplemental Nutrition Assistance Program (SNAP), or a high school student who is one year older, or more, than the expected age for the grade in which the student is enrolled.¹¹ In contrast, eligibility for free and reduced-price meals encompasses a larger percentage of students, including those who qualify because of the relative need for their classmates, through Community Eligibility Provision (CEP), rather than their individual household’s socioeconomic status.

Second, we used data on where students live rather than where they attend school, because fewer than 40% of public-school students in the District attend the school located closest to where they live.¹² As part of its “EdScape Beta” website, the Office of the Deputy Mayor for Education (DME) publishes data on where students considered at-risk of academic failure live, divided into 39 residential Neighborhood Clusters.¹³ In SY 2018-19, the most recent year available, there were 38,655 at-risk students, with between 13 (cluster 4: Georgetown, Burleith/Hillandale) and 5,453 (cluster 39: Congress Heights, Bellevue, Washington Highlands) at-risk students living in each neighborhood cluster. See Figure 2 below for a map of the District’s residential Neighborhood Clusters.

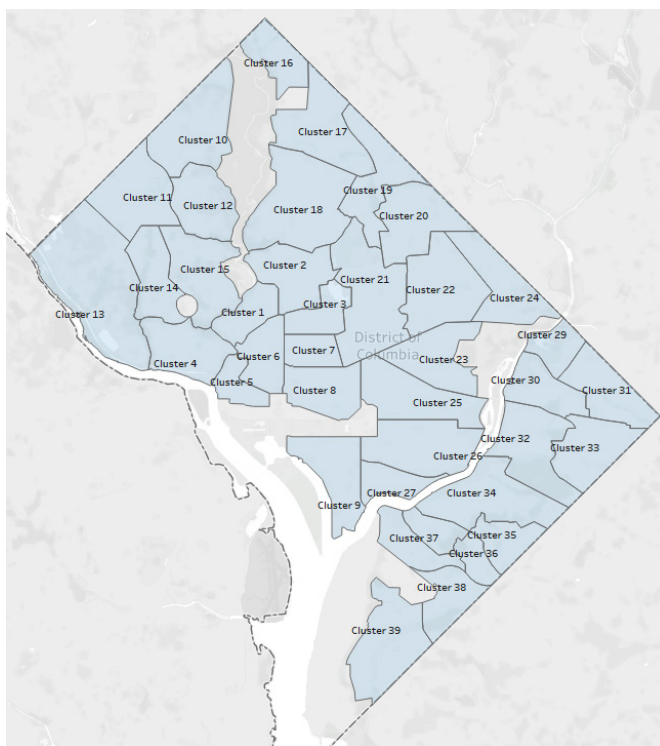
10 The District uses “direct certification” to identify economically disadvantaged students, using household participation in safety net programs as an indicator of low-income status.

11 D.C. Code § 38-2901(2A).

12 Wolf, R., Armstrong, C., & Ross, S. (2020). Enrollment Projections in D.C. Public Schools: Controls Needed to Ensure Funding Equity. Office of the D.C. Auditor, page 52.

13 “Where Students Identified as At Risk of Academic Failure Live”, Office of the Deputy Mayor for Education, accessed 11/30/2020, <https://edscape.dc.gov/node/1385231>.

Figure 2: Map of D.C. Neighborhood Clusters



Source: DC Open Data

Specifically, we evaluated the availability of Grab & Go meals using the following metric:

- What percentage of at-risk students had at least one Grab & Go meal site located in their home neighborhood cluster throughout the audit scope (March through July 2020)?

To determine how many reimbursable meals were served during the COVID-19 public health emergency we gathered site-level data on meals served by month and compared them with the most recently completed SY (2018-19) and summer (2019). We focused our analysis on the first four and a half months of the pandemic (mid-March through July 2020) because sponsors and School Food Authorities (SFAs) report figures to OSSE on a monthly basis and these were the most recent completed months available. We also focused our analysis on meals served at the free or reduced-price levels for SY 2018-19 to better compare year-over-year trends in meals served to most children in need.

This report was drafted, reviewed, and approved in accordance with the standards outlined in ODCA's Audit Policies and Procedures.

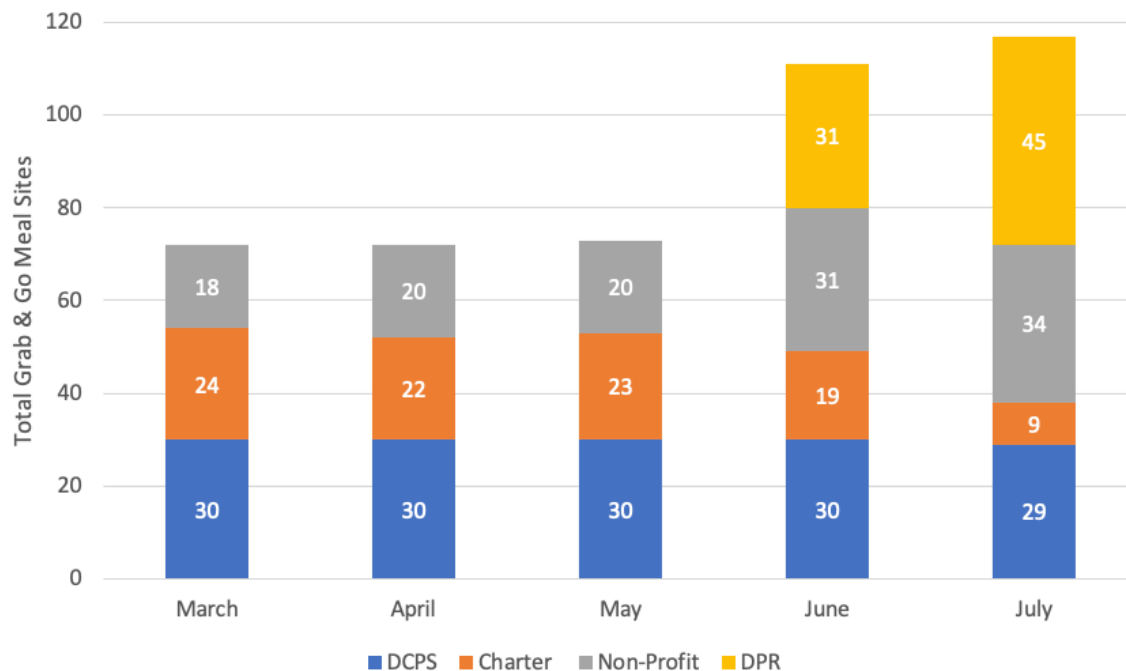
Audit Results

Finding 1: Meal sponsors moved quickly to provide free meals for children during the onset of the coronavirus pandemic.

The Families First Coronavirus Response Act¹⁴ allowed the USDA to waive several requirements related to reimbursable meal services during the pandemic. Requirements waived included rules related to students eating meals on site and allowed parents to pick up meals outside of normal mealtimes. Also, according to a written response from OSSE, sponsors made their own decisions regarding where to open meal sites.

The District’s meal sponsors responded to these regulatory flexibilities by quickly opening many sites throughout the city. As shown in Figure 3 below, 72 sites were open and serving meals within the first two weeks of the public health emergency in March 2020: 30 sites sponsored by DCPS, 24 by public charter school LEAs and 18 by non-profit organizations. In April, two more non-profit sites opened, and two charter school sites closed. The District’s Department of Parks and Recreation (DPR) opened its first meal sites in June, while some charter school LEAs closed their sites for the summer.

Figure 3: Count of 2020 Grab & Go Meal Sites Open by Sponsor Type and Month



Source: OSSE-supplied records of sites serving meals by month

14 P.L. 116-127, Section 2202.

Meal sponsors moved swiftly to provide free meals for children during the onset of the pandemic. Most meal sponsors used their existing facilities, like school buildings and recreation centers, for meal distribution, but some non-profit sponsors also opened additional meals sites at community centers and churches to better serve residents. DCPS drew upon its existing Emergency Closure Guidelines to prioritize sites that could produce and house larger quantities of meals for distribution.

The District's meal sponsors were ready to open meal sites when schools were shut down suddenly in March. Even though some sites later closed, other sponsors like DPR opened sites to help keep free meals accessible for the District's youth.

Finding 2: Grab & Go meal sites were generally opened in areas of greatest need, but location decisions could have been better optimized to reach more students in need.

According to OSSE's LEA Meal Provision Guidance, sponsors decided whether to open meal sites and where to locate them. Normally OSSE must ensure that all sites are in areas "in which poor economic conditions exist",¹⁵ but the USDA waived this requirement during the pandemic.¹⁶

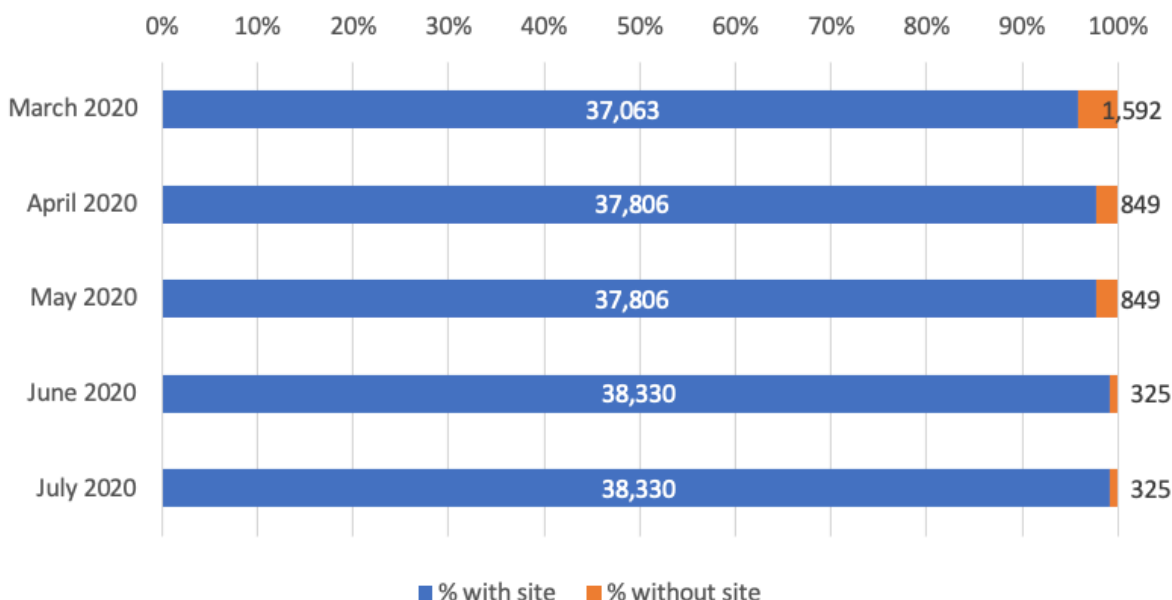
Some 96% of at-risk students had access to at least one Grab & Go meal site in their home neighborhood cluster throughout the pandemic.

As shown in Figure 4, most at-risk students had at least one open meal site located near their home throughout the pandemic. In March, 37,603 of the District's 38,655 total at-risk students (96%) had access to at least one open meal site located in the same neighborhood cluster as their home. That number increased throughout the pandemic as more sites came online, moving up to 98% and 99% by late spring and summer.

15 Defined in Richard B. Russell National School Lunch Act in Section 13(a)(1)(A) and as primarily referenced in regulation 7 CFR 225.2 as an area in which at least 50 percent of children are eligible for free or reduced-price meals

16 USDA Waiver #32 – Area Eligibility

Figure 4: Percent of At-Risk Students with at Least One Meal Site in Their Neighborhood Cluster, by Month



Source: OSSE-supplied records of site locations; DME EdScape Beta for at-risk by neighborhood cluster

Some neighborhoods with many at-risk students could have had better access to meals sooner.

Most meal sites were opened in areas with large numbers of at-risk student residents. For example, Cluster 39 (Ward 8: Congress Heights, Bellevue, Washington Highlands) is home to more than 5,000 at-risk students and had at least seven open meal sites throughout the pandemic. Likewise, Cluster 31 (Ward 7: Deanwood, Burrville, Grant Park, Lincoln Heights, Fairmont Heights) which is home to nearly 2,000 at-risk students had at least four open meal sites available between March and July 2020. Overall, 27 of the District’s 39 neighborhood clusters had continuous access to at least one meal site throughout March through July 2020, five clusters gained a site part way through the pandemic and seven clusters had no meal site coverage.

Unfortunately, some neighborhoods with large numbers of at-risk student residents did not have consistent access to a nearby open meal site. As shown in Figure 5, Clusters 33 (Ward 7: Capitol View, Marshall Heights, Benning Heights), 34 (Twining, Fairlawn, Randle Highlands, Penn Branch, Fort Davis Park, Fort Dupont) and 36 (Woodland/Fort Stanton, Garfield Heights, Knox Hill) all started with just one site, but by July had between three and six open sites, a sign that more sites could have been opened earlier. Cluster 29 (Ward 7: Eastland Gardens, Kenilworth) and its 372 at-risk students did not get an open meal site until DPR began meal service in June.

Conversely, some areas of the city received meal coverage despite having relatively few at-risk resident students. Cluster 5 (Ward 2: West End, Foggy Bottom, GWU) is home for only 14 at-risk students, but it had an open meal site in March. Cluster 11 (Ward 3: Friendship Heights, American University Park,

Tenleytown) also had an open meal site throughout the pandemic, despite only having 47 at-risk student residents.

**Figure 5: Number of Meal Sites Open by Month in all 39 Neighborhood Clusters
(organized by SY18-19 At-Risk Student Count)**

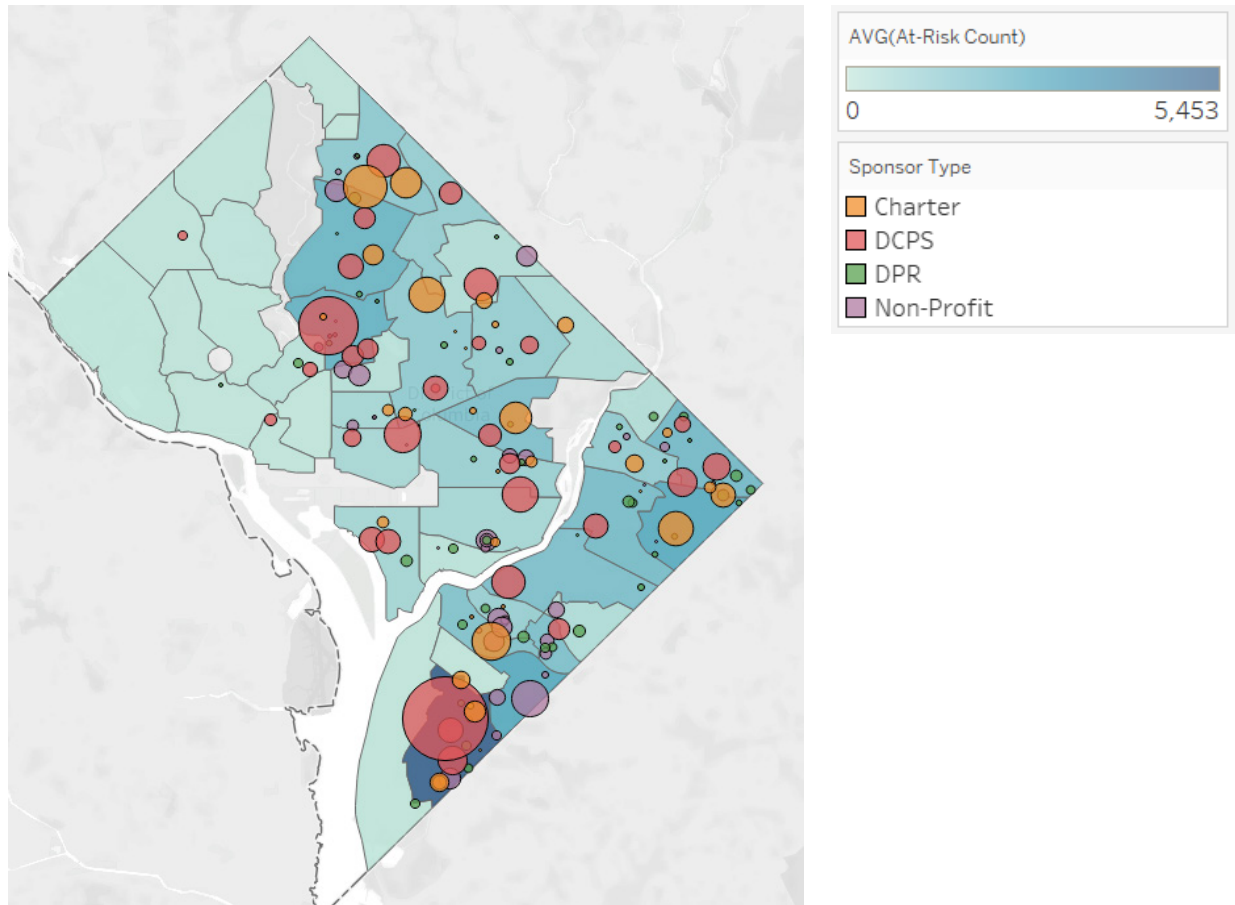
Neighborhood Cluster	Neighborhood Cluster Names	At-Risk Students	March 2020 Sites	April 2020 Sites	May 2020 Sites	June 2020 Sites	July 2020 Sites
Cluster 39	Congress Heights, Bellevue, Washington Highlands	5,453	10	7	8	12	11
Cluster 38	Douglas, Shipley Terrace	2,613	2	2	2	2	3
Cluster 33	Capitol View, Marshall Heights, Benning Heights	2,561	1	2	2	3	6
Cluster 2	Columbia Heights, Mt. Pleasant, Pleasant Plains, Park View	2,289	4	4	4	5	8
Cluster 18	Brightwood Park, Crestwood, Petworth	2,161	3	4	4	5	6
Cluster 31	Deanwood, Burrville, Grant Park, Lincoln Heights, Fairmont Heights	1,962	6	4	4	7	8
Cluster 32	River Terrace, Benning, Greenway, Dupont Park	1,846	2	1	1	3	4
Cluster 34	Twining, Fairlawn, Randle Highlands, Penn Branch, Fort Davis Park, Fort Dupont	1,707	1	1	1	2	3
Cluster 36	Woodland/Fort Stanton, Garfield Heights, Knox Hill	1,695	1	2	2	4	4
Cluster 23	Ivy City, Arboretum, Trinidad, Carver Langston	1,672	3	2	2	2	3
Cluster 37	Sheridan, Barry Farm, Buena Vista	1,615	2	3	3	5	4
Cluster 17	Takoma, Brightwood, Manor Park	1,313	4	4	4	6	3
Cluster 21	Edgewood, Bloomingdale, Truxton Circle, Eckington	1,196	4	3	3	4	4
Cluster 30	Mayfair, Hillbrook, Mahaning Heights	1,169	1	2	2	4	4
Cluster 19	Lamont Riggs, Queens Chapel, Fort Totten, Pleasant Hill	1,081	1	1	1	1	1
Cluster 22	Brookland, Brentwood, Langdon	1,053	4	4	4	5	4
Cluster 28	Historic Anacostia	1,011	3	2	2	5	5
Cluster 25	Union Station, Stanton Park, Kingman Park	991	4	5	4	5	6
Cluster 9	Southwest Employment Area, Southwest/Waterfront, Fort McNair, Buzzard Point	689	2	2	2	2	2
Cluster 7	Shaw, Logan Circle	671	2	1	1	2	2
Cluster 26	Capitol Hill, Lincoln Park	661	3	5	5	6	6
Cluster 8	Downtown, Chinatown, Penn Quarters, Mount Vernon Square, North Capitol Street	637	2	2	2	4	4
Cluster 24	Woodridge, Fort Lincoln, Gateway	490	0	1	1	1	1
Cluster 35	Fairfax Village, Naylor Gardens, Hillcrest, Summit Park	418	1	1	1	2	2
Cluster 29	Eastland Gardens, Kenilworth	372	0	0	0	1	1
Cluster 20	North Michigan Park, Michigan Park, University Heights	371	1	2	3	3	3
Cluster 3	Howard University, Le Droit Park, Cardozo/Shaw	253	0	1	2	2	1
Cluster 1	Kalorama Heights, Adams Morgan, Lanier Heights	167	2	2	1	4	4
Cluster 27	Near Southeast, Navy Yard	139	0	0	0	1	1
Cluster 12	North Cleveland Park, Forest Hills, Van Ness	75	0	0	0	0	0
Cluster 14	Cathedral Heights, McLean Gardens, Glover Park	65	0	0	0	0	0
Cluster 16	Colonial Village, Shepherd Park, North Portal Estates	62	0	0	0	0	0
Cluster 10	Hawthorne, Barnaby Woods, Chevy Chase	53	0	0	0	0	0
Cluster 11	Friendship Heights, American University Park, Tenleytown	47	1	1	1	1	1
Cluster 15	Cleveland Park, Woodley Park, Massachusetts Avenue Heights, Woodland-Normanstone Terrace	28	0	0	0	0	0
Cluster 13	Spring Valley, Palisades, Wesley Heights, Foxhall Village, Georgetown Reservoir	24	0	0	0	0	0
Cluster 6	Dupont Circle, Connecticut Avenue/K Street	18	0	0	0	0	0
Cluster 5	West End, Foggy Bottom, GWU	14	1	1	1	1	1
Cluster 4	Georgetown, Burieth/Hillandale	13	0	0	0	1	1

Source: OSSE-supplied records of meals served by site; DME EdScape Beta for at-risk by neighborhood cluster

School-based meal sites were generally the busiest, particularly where many at-risk students live.

The busiest meal sites tended to be located in parts of the city with more at-risk students. As shown in Figure 6, and in [an interactive map online](#), the sites located in neighborhood clusters with more at-risk students tended to serve more meals on a monthly basis. The busiest site was Ballou High School, in Ward 8, which served slightly more than 165,000 meals from March through July 2020. Second busiest was Columbia Heights Education Campus (CHEC) in Ward 1, which served just under 80,000 total meals. The third busiest site was Paul Public Charter School in Ward 4, which served more than 43,000 total meals.

Figure 6: Total Meals Served by Site and Sponsor Type from March Through July 2020, as well as Neighborhood Cluster Gradient Color by At-Risk Count



Source: OSSE-supplied records of meals served by site; DME EdScape Beta for at-risk by neighborhood cluster

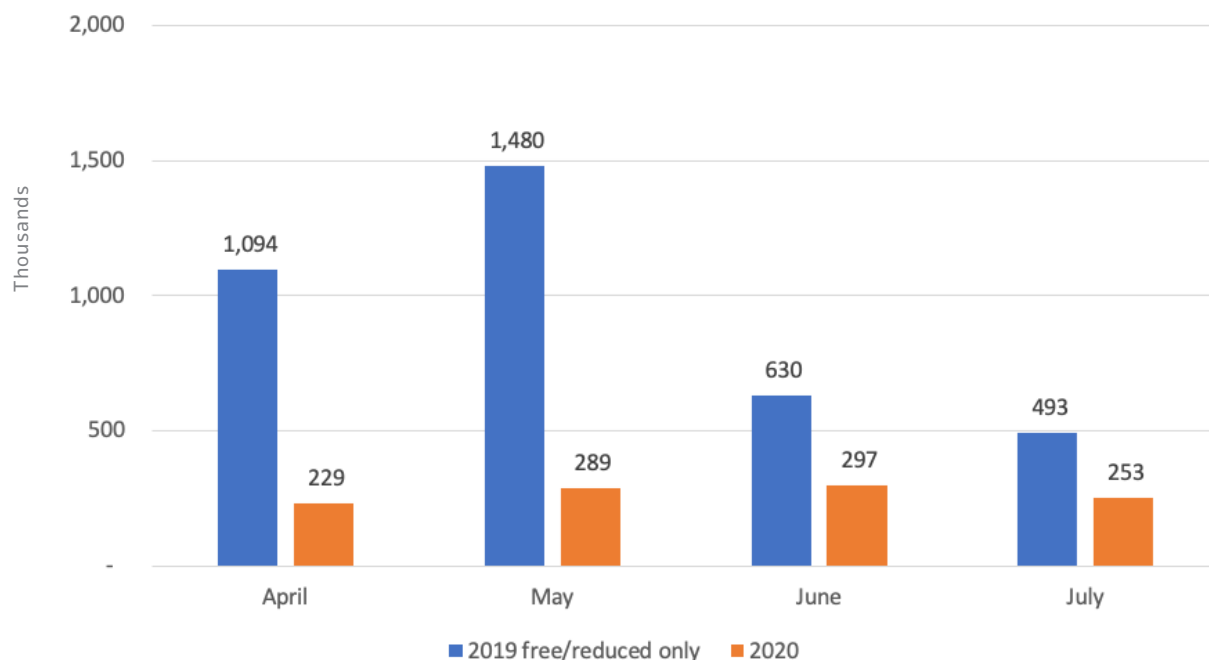
Some sites served much lower numbers of meals than their counterparts nearby. For example, Noyes Elementary School, located in Ward 5, served only 22 meals throughout the month of April, while Langdon Elementary School, also in Ward 5 and located about one mile away, served more than 2,000 meals. Likewise, Thurgood Marshall Academy Public Charter School served 147 meals in May 2020, while KIPP AIM Academy Public Charter School (Douglass Campus) located about a half a mile away, served 9,424 total meals that month.

Sites located in neighborhoods with relatively few at-risk students living nearby, were also not as busy. Wilson High School, located in Ward 3, was the only site open West of Rock Creek Park until the Jelleff Recreation Center opened in June. Wilson served just under 2,000 total meals from March through July – the second lowest total among DCPS schools open for meal service during the pandemic.

Our analysis highlights a trend that deserves further research in the future. As shown in Figure 7, the number of meals served by month in 2020 dropped dramatically compared with the same time period in 2019. More than 1 million free and reduced-price meals were served in each of April and May 2019,

but those figures dropped by more than 75% in 2020 during the early months of the pandemic. In June and July of 2020, the number of free meals served held roughly steady, although still lower than during summer 2019.

Figure 7: Total Free and Reduced-Price Meals Served by Year and Month (in Thousands)



Source: OSSE-supplied records

As previously shown in Figure 1, the distribution of Pandemic Electronic Benefits Transfer (P-EBT) subsidies began in May 2020 with 37,976 students, over 50% of eligible students, receiving this benefit in the month of May. However, the distribution of this benefit did not have a large effect on the number of meals served at Grab & Go meal sites.

Without precise data on which children picked up meals at each site it is impossible to determine whether children in need of meals were left without them, but the drop in meals served during the pandemic compared to 2019 is cause for greater attention and monitoring for OSSE and its meal sponsors.

According to a written response from OSSE, it supported sponsors in their decision-making regarding the operation and location of open feeding sites by publishing guidance, hosting technical assistance calls and developing a map that analyzed walking distance between feeding sites with OCTO. As the state education agency, OSSE had to approve meal sponsor applications¹⁷, but was only required to step into location decisions if two applicants proposed to serve the same area.¹⁸

¹⁷ 7 CFR 225.9(d).

¹⁸ 7 CFR 225.6(b)(5)(v).

We found OSSE performed duties required of it as a state education agency during the pandemic. However, given the fact that some Neighborhood Clusters could have benefited from additional sites earlier in the pandemic and the decrease in the total number of meals served compared to the previous year, we believe there is room for OSSE to play a more active role of recommending meal sites in areas that needed additional meal site coverage.

Recommendations

1. OSSE should actively monitor the locations of Grab & Go meal sites to ensure equitable access to meals during public emergencies and unanticipated school closures. Monitoring activities should include an evaluation of the walking distance to meal sites and recommendation for meal site locations when disparities are identified.
2. OSSE should identify the most effective practices of its meal sponsors in reaching students in need during unanticipated school closures.

Conclusion

The District's Summer Food Service Program (SFSP) sponsors moved quickly to meet the nutritional needs of students during an unprecedented pandemic. Within days of the public health emergency being declared, 72 meal sites opened to children throughout the District. The Department of Human Services (DHS) also distributed more than \$12 million in Pandemic Electronic Benefits Transfer (P-EBT) benefits into the hands of SNAP households shortly after the District's plan was approved in May, along with nearly \$13 million in subsidies for non-SNAP households throughout the summer.

Free meal sites were generally opened in areas of greatest need, but greater coordination could have improved the District's coverage of all neighborhoods. Some 96% of at-risk students had access to at least one open meal site during the first four and a half months of the pandemic, March through July 2020. The process could have been improved with stronger monitoring from OSSE, which gave sponsors discretion on when and where to open meal sites. As the state education agency, OSSE is better situated to evaluate the city's collective needs and make decisions in a time of crisis. For example, despite the health emergency DPR did not open its sites until mid-June, when the sites normally open for summertime operations. A decision by the Bowser Administration to open those sites earlier could have provided neighborhoods that relied on the DPR sites, like Kenilworth in Ward 7, easier access to meals earlier in the pandemic.

Overall, open meal sites served 75% fewer meals than they served during the same months of 2019. And while some drop-off is to be expected during virtual learning, this trend suggests that some students may have gone hungry. Another area for further study would be what strategies were most effective at reaching families in need of meals. Some sponsors delivered meals to families. Others offered expanded hours for pickup, outside of the mid-day timeframe typically offered by DCPS. While the answer to this question is outside of the scope of this study, we hope the District and its meal program sponsors take the opportunity to learn from their peers' experiences and innovate to reach more students with open meal service.

Agency Comments

On December 24, 2020, we sent a draft copy of this report to the Office of the State Superintendent for Education (OSSE) for review and written comment within 72 hours (holiday weekend excluded). OSSE responded with comments on the report on December 29, 2020. Agency comments are included here in their entirety, followed by ODCA's response.



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

December 29, 2020

Ms. Kathleen Patterson
District of Columbia Auditor
Office of the District of Columbia Auditor
717 14th Street, NW
Suite 900
Washington, DC 20005

Dear Ms. Patterson,

This letter is in response to your letter dated December 24, 2020 which provided OSSE with the opportunity to respond to the COVID-19 Special Report *D.C. Serves Grab & Go Meals Quickly, Efficiently During COVID-19*. We appreciate not only your recognition of the important role that high-quality, accessible meals have in the health and wellbeing of students in the District of Columbia during this public health emergency, but also the commendable efforts of the District's meal sponsors to provide meal access expediently and in areas of greatest need.

Since March, the DC Office of the State Superintendent of Education (OSSE) has collaborated with DC Public Schools (DCPS), the Department of Parks and Recreation, the Department of Human Services, as well as Mayor Muriel Bowser's Emergency Operations Center to implement several initiatives to support the food security of the District's children and adolescents. Collectively, these entities provided meal sites to areas with the greatest need, free groceries at select DCPS meal sites, a home delivery system to supply essential resources, including food, for quarantined residents, and benefits to eligible students through the Pandemic EBT program. Below, we respond to each of your recommendations made in the report.

Recommendation 1: OSSE should actively monitor the locations of Grab & Go meal sites to ensure equitable access to meals during public emergencies and unanticipated school closures. Monitoring activities should include an evaluation of the walking distance to meal sites and recommendation for meal site locations when disparities are identified.

OSSE agrees with this recommendation and is already implementing it; however, as a point of clarity, federal regulations do not allow OSSE as the State agency to require sponsors to open feeding sites in particular locations. See 7 CFR §225.6(c). Federal regulations provide discretion to sponsors to make their own decisions on location of meal service sites. Yet, the mapping of meal service sites, including an overlay of walking distance for residents, continues to be a central strategy in our monitoring and technical assistance to meal service sponsors. OSSE will continue to provide recommendations to sponsors regarding

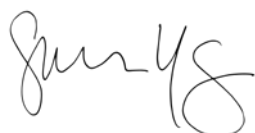
areas of unmet need, as well as mapping tools and opportunities for thought partnership with other sponsors, to inform their site selection and program administration.

Recommendation 2: OSSE should identify the most effective practices of its meal sponsors in reaching students in need during unanticipated school closures.

OSSE agrees with this recommendation and is already implementing it. We will continue to engage with sponsors to elevate best practices and challenges in the provision of meals during the public health emergency, including offering routine opportunities for technical assistance and peer-to-peer learning.

In summary, we are grateful for ODCA's interest in this critical area of service to District youth during the public health emergency. We look forward to continuing to provide high rates of meal service coverage and related food security supports, especially in areas of greatest need, to District young people and their families.

Sincerely,

A handwritten signature in black ink, appearing to read "Shana Young". The signature is fluid and cursive, with the first name "Shana" and the last name "Young" clearly distinguishable.

Shana Young
Interim State Superintendent of Education
Government of the District of Columbia
Office of the State Superintendent of Education

Cc: Justin Tooley, Deputy Chief of Staff, Office of the State Superintendent of Education
Kevin Stokes, Interim General Counsel, Office of the State Superintendent of Education
Dr. Heidi Schumacher, Assistant Superintendent, Division of Health and Wellness

ODCA Response to Agency Comments

We appreciate OSSE's review and comments on this rapid response report. We are encouraged that OSSE agrees with both recommendations and that they are already implementing them. The District alongside its meal service sponsors did a commendable job of providing access to Grab & Go meal sites during the onset of the COVID-19 pandemic.

In response to Recommendation 1, OSSE cited federal regulations for the content of sponsor applications under the Summer Food Service Program. While it is true that sponsors must apply to the state agency (OSSE) for participation in the program, it is also true that OSSE and two of the District's largest meal sponsors, DCPS and DPR, operate under the same executive administration. For this reason, it would have been possible for the Executive to require greater cooperation between District agencies to ensure equitable access to meal sites throughout the pandemic and, for example, opened DPR sites earlier in areas not well served by other sponsors. This may be something to consider for the future.

Summary of Report Recommendations

The recommendation in this report can be implemented without significant costs to the agency, and help to advance the goals of OSSE, as seen below.

Recommendation	Is There a Cost to the Agency/ Entity to Implement?	Potential to Generate Revenue or Savings to the District?	Specific Agency/ Entity or District-Wide Goal Advanced by Recommendation
<p>OSSE should actively monitor the locations of Grab & Go meal sites to ensure equitable access to meals during public emergencies and unanticipated school closures. Monitoring activities should include an evaluation of the walking distance to meal sites and recommendation for meal site locations when disparities are identified.</p>	<p>Yes</p>	<p>Yes</p>	<p>KPI 1: High quality and actionable data.</p>
<p>OSSE should identify the most effective practices of its meal sponsors in reaching students in need during unanticipated school closures.</p>	<p>Yes</p>	<p>Yes</p>	<p>KPI 1: High quality and actionable data.</p>

About ODCA

The mission of the Office of the District of Columbia Auditor (ODCA) is to support the Council of the District of Columbia by making sound recommendations that improve the effectiveness, efficiency, and accountability of the District government.

To fulfill our mission, we conduct performance audits, non-audit reviews, and revenue certifications. The residents of the District of Columbia are one of our primary customers and we strive to keep the residents of the District of Columbia informed on how their government is operating and how their tax money is being spent.

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