

GAO

Briefing Report to Congressional
Requesters

December 1993

FOOD ASSISTANCE

Schools That Left the
National School Lunch
Program





United States
General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

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December 3, 1993

The Honorable William D. Ford
Chairman
The Honorable William F. Goodling
Ranking Minority Member
Committee on Education and Labor
House of Representatives

The Honorable Dale E. Kildee
Chairman, Subcommittee on Elementary,
Secondary, and Vocational Education
Committee on Education and Labor
House of Representatives

The National School Lunch Program (NSLP), established in 1946, is one of the federal government's oldest and largest food assistance programs. On a typical school day, about 25 million children at about 93,000 schools receive lunch through the program. Program participants include about 81,000 public schools (95 percent of such schools); 6,400 private schools (less than 30 percent of such schools); and 5,300 residential child care institutions.¹ The U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) administers the program, which in fiscal year 1993 cost about \$4.7 billion.

Schools that choose to participate in the school lunch program receive cash subsidies and donated food from USDA. In return, schools must meet various federal requirements, such as offering free and reduced-price lunches to eligible children and ensuring that lunches meet specific dietary patterns for meals. Schools are reimbursed at a basic rate for each meal served under the program. Children from families whose income falls below certain thresholds can qualify for free or reduced-price meals; schools are reimbursed for these meals at higher rates. About half of the meals served through the program are provided free or at a reduced price.

In response to concerns that schools may be withdrawing from the NSLP and to assist you in preparing for upcoming hearings on reauthorizing the child nutrition programs, you asked us to provide information on the (1) number of schools that withdrew from the program, (2) characteristics

¹Residential child care institutions include, but are not limited to, homes for the mentally, emotionally, or physically impaired; temporary shelters for abused or runaway children; and juvenile detention centers.

of schools that withdrew, (3) reasons why schools withdrew, and (4) lunch services offered at the schools after they withdrew.

In summary:

- We identified about 300 schools that withdrew from the program between July 1989 and February 1993. These withdrawals amounted to less than one-half of 1 percent of the schools in the program. During this same period, participation in the program increased from about 91,300 to about 93,000 schools.
- Nearly 60 percent of the schools that left the NSLP were public schools. Generally, those leaving had fewer than 600 students; were elementary schools; on average, served fewer NSLP meals than other schools participating in NSLP; and, on average, served fewer free and reduced-price meals than other participating schools. Forty-two percent of those that left were located in the northeastern United States.
- Officials of schools that left the program most frequently identified three specific reasons for leaving: (1) Their lunch programs were losing money, (2) labor costs were high, and (3) students were interested in buying menu items prohibited by the program. As major influences on leaving the program, officials cited financial or participation factors much more often than administrative factors.
- More than 70 percent of the schools that withdrew from the program continued to provide daily lunch service. Also, most schools continued such program policies as (1) providing benefits for students eligible for free and reduced-price lunches, (2) serving lunches that follow a meal pattern guideline, (3) providing modified meals to students unable to consume a regular lunch, and (4) maintaining policies to avoid overt identification of students receiving free or reduced-price lunches.

The sections in this briefing report provide a more detailed discussion of the results of our review. Section 1 presents information on the number and characteristics of schools that withdrew from the program. Section 2 reports the reasons for schools' withdrawal from the program. Section 3 describes lunch services offered at the schools after they withdrew. Section 4 provides additional background information on the program, and section 5 describes the objectives, scope, and methodology of our review. This is the second in a series of reports we are doing at your request to assist you in the 1994 hearings on reauthorizing child nutrition programs.²

²The first report is entitled Food Assistance: Information on Meal Costs in the National School Lunch Program (GAO/RCED-94-32BR, Dec. 1, 1993).

To identify the number of schools that withdrew from the program, we contacted FNS officials and state officials responsible for administering the program. Using information obtained from them, we compiled a nationwide list of 352 school food authorities (SFA)³ that may have had schools that withdrew from the program.

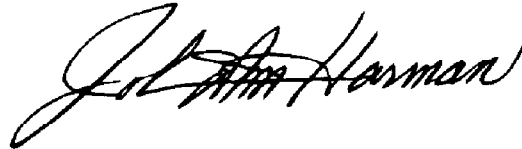
We then developed a questionnaire and mailed it to each of the 352 SFAs. We asked school officials to provide information on the (1) number of schools that withdrew from the program, (2) characteristics of these schools, (3) why the schools withdrew, and (4) lunch services offered at the schools after they withdrew. From the 208 SFAs that responded to our questionnaire, we identified 302 schools that had dropped out of the NSLP. Section 5 contains a detailed explanation of our questionnaire methodology, and appendix I contains a copy of the questionnaire containing all of the schools' responses. We did not survey schools remaining in the NSLP to find out how often conditions that led some schools to withdraw from the NSLP also exist at schools remaining in the program. We performed our work from September 1992 through October 1993, in accordance with generally accepted government auditing standards.

We did not obtain formal agency comments on this briefing report; however, we did discuss a draft of the briefing report with responsible USDA officials and have included their comments, where appropriate. The officials generally agreed with our briefing report.

We are sending copies of this briefing report to the Secretary of Agriculture, the Assistant Secretary for Food and Consumer Services, the FNS Administrator, and other interested parties. We will make copies available to others upon request.

³A school food authority is a governing body responsible for administering one or more schools and has legal authority to operate the NSLP.

Please call me at (202) 512-5138 if you or your staff have any questions.
Major contributors to this briefing report are listed in appendix III.

A handwritten signature in cursive script that reads "John W. Harman". The signature is written in black ink and is positioned below the contact information.

John W. Harman
Director, Food and
Agriculture Issues

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Abbreviations

FNS	Food and Nutrition Service
GAO	General Accounting Office
NSLP	National School Lunch Program
SFA	school food authority
USDA	U.S. Department of Agriculture

Number and Characteristics of Schools That Left the National School Lunch Program

We identified about 300 schools that left the National School Lunch Program (NSLP) between July 1989 and February 1993. All together, these schools represent less than one-half of 1 percent of the 93,000 schools and residential child care institutions that participated in the NSLP as of October 1992. Schools that left the NSLP generally

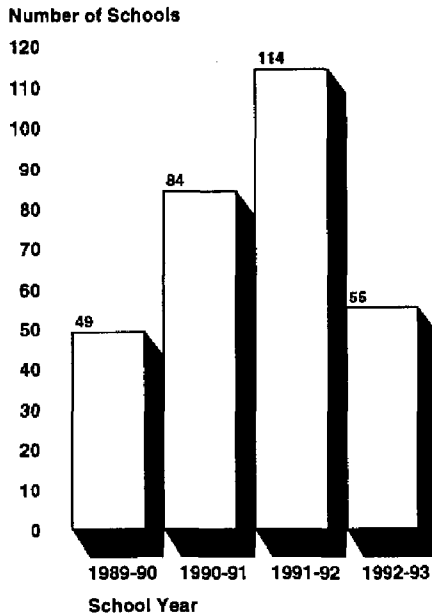
- were public schools;
- had fewer than 600 students;
- were elementary schools;
- served, on average, fewer NSLP meals daily than other schools participating in the NSLP;
- served, on average, fewer free and reduced-price NSLP meals than other participating schools; and
- were located in the northeastern United States.

Few Schools Left the NSLP Compared to Those Remaining

We identified about 300 schools that dropped out of the NSLP during the last 4 years. The number of schools leaving the NSLP increased between school years 1989-90 and 1990-91 and again between school years 1990-91 and 1991-92. Information on the number of schools leaving the NSLP in school year 1992-93 represents a partial school year; the data include only schools that left the program during the first half of the school year. Figure 1.1 shows the number of schools leaving the NSLP. During this same period, total school participation increased by more than 1,700 schools, from 91,325 in school year 1989-90 to 93,055 in school year 1992-93.

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Figure 1.1: NSLP School Dropouts,
School Years 1989-90 Through 1992-93



Relatively few students are affected by the schools leaving the NSLP. For example, the 294 dropout schools that provided enrollment data enrolled fewer than 160,000 students, or two-fifths of 1 percent of the 44 million students enrolled in NSLP-participating schools.¹

Furthermore, some schools that left the NSLP have returned. Of the 295 schools that reported on their current participation status in the NSLP, 22, or 7 percent, reported that they have since returned to the program. Another 11 schools, or 4 percent of the 267 schools that reported on their future NSLP participation status, said that they anticipate returning to the program.

Profile of Schools That Left the NSLP

Among the schools we identified that left the NSLP between July 1989 and February 1993,

- 59 percent are public schools;
- 67 percent enroll fewer than 600 students;

¹Schools did not always answer each and every question on our questionnaire. Where appropriate, we have shown the number of schools responding to a question with our analysis of how they responded.

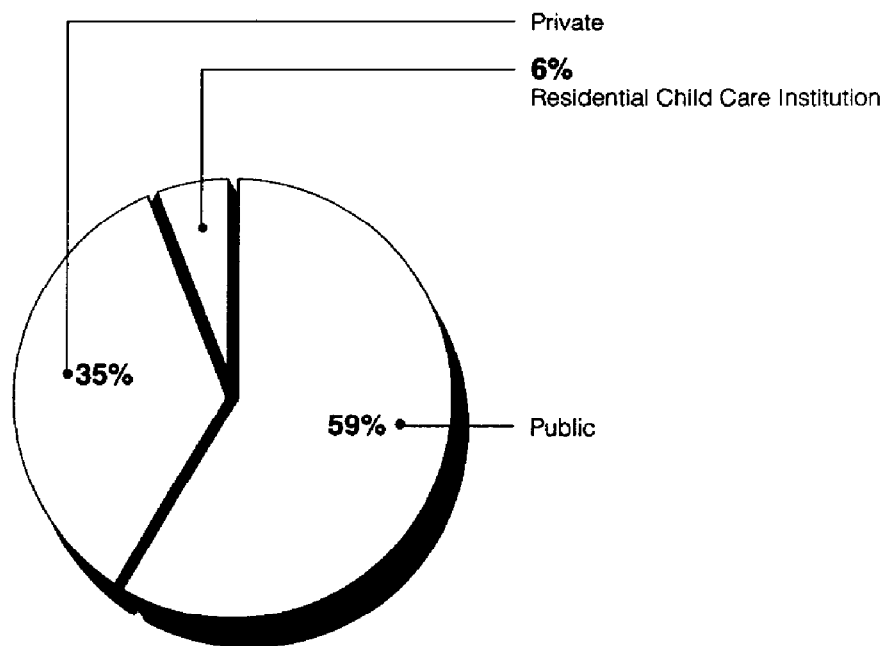
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- 43 percent are elementary schools;
- on average, served fewer NSLP meals daily and also served fewer free and reduced-price meals than other schools in the NSLP; and
- 42 percent are located in the Northeast.

More Public Than Private
Schools Left the NSLP

One hundred and seventy-seven (59 percent) of the 302 schools that dropped out of the NSLP between 1989 and 1993 are public schools; 107 (35 percent) are private schools; and 18 (6 percent) are residential child care institutions. (See fig. 1.2.)

Figure 1.2: Percentage of Schools Leaving the NSLP That Are Public, Private, and Residential Child Care Institutions

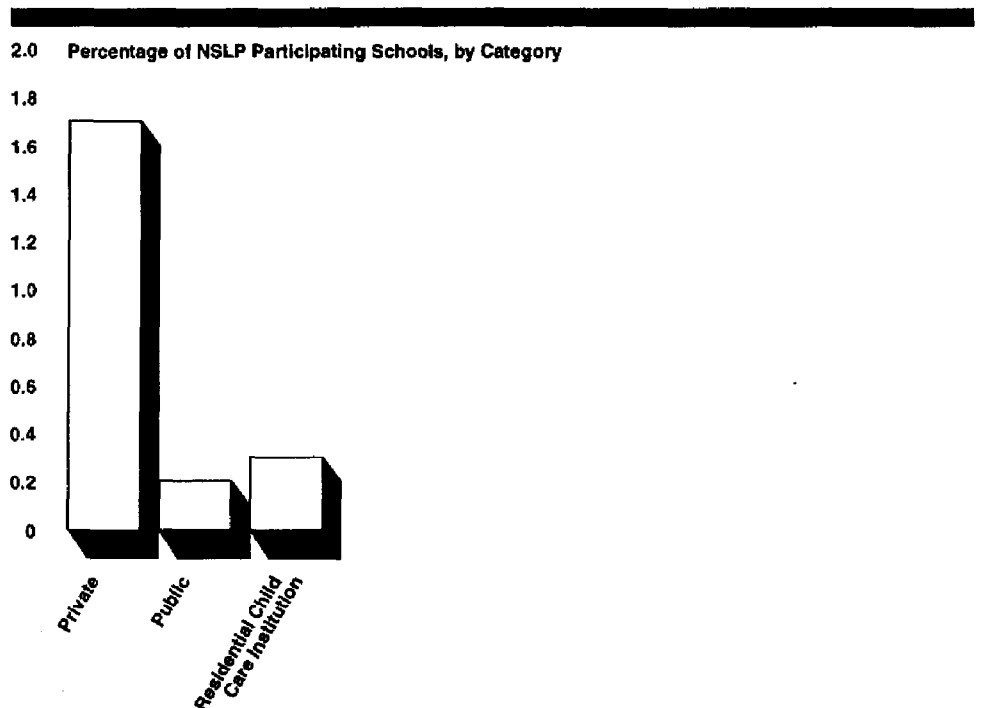


Although more public schools left the NSLP than private schools, the percentage of private schools leaving the program in relation to the total number of participating private schools was greater than the percentage of public schools or residential child care institutions leaving the program in relation to the number of participating schools in these two categories. As shown in figure 1.3, the percentage of private schools leaving the NSLP was

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several times higher than the percentage of public schools and residential child care institutions leaving the NSLP. Of the 6,400 private schools participating in the NSLP, 107 (1.7 percent) dropped out of the program during the 4-year period of our review. Of the 81,000 participating public schools, 177 (0.2 percent) dropped out of the program. Of the participating 5,300 residential child care institutions, 18 (0.3 percent) dropped out of the program.

Figure 1.3: NSLP Dropouts, by School Category, Compared to NSLP Participants in Each Category

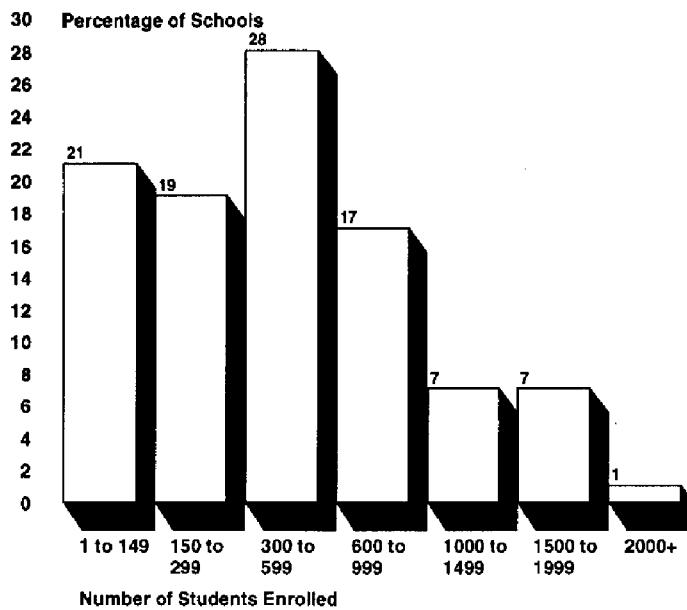


Schools With Fewer Than 600 Students Left the NSLP Most Often

Sixty-seven percent of the schools we identified that left the NSLP enrolled fewer than 600 students, while less than 2 percent enrolled more than 2,000 students. Figure 1.4 shows the distribution of schools that left the NSLP by the number of students enrolled.

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Figure 1.4: Percentage of NSLP Dropouts, by School Enrollment



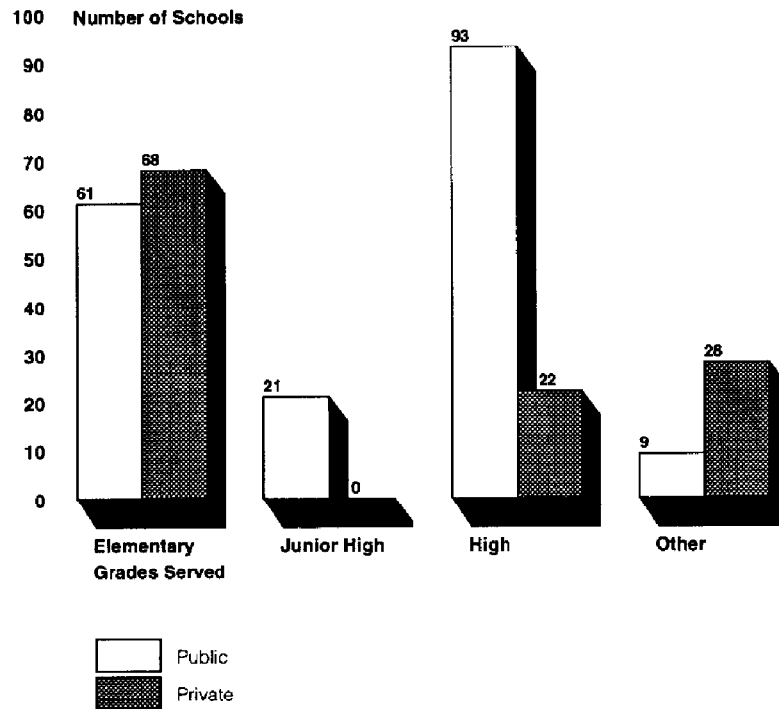
More Elementary Schools Than High Schools or Junior High Schools Left the NSLP

Among schools that left the NSLP, about 43 percent are elementary schools, 38 percent are high schools, and 7 percent are junior high schools. Twelve percent of the schools serve other student populations (for example, all grades, students requiring special curricula, or students in residential child care institutions).

As shown in figure 1.5, private schools make up a slight majority of elementary schools that left the program. The figure also shows that public schools make up the greatest share of high schools that left the program.

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Figure 1.5: Distribution of Public and Private Schools That Left the NSLP, by Grades Served



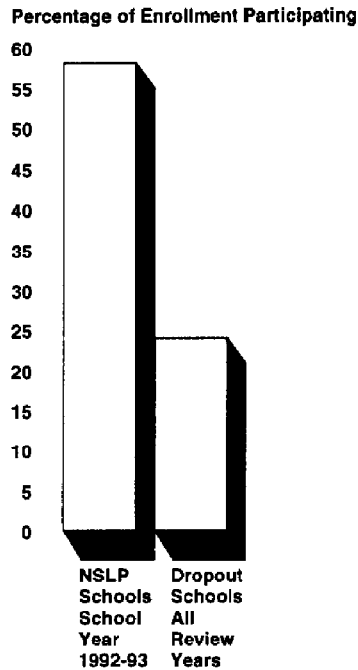
Note: "Other" includes schools that serve all grades (K-12), schools for students requiring special curricula, and residential child care institutions.

Few NSLP Meals Served

On the basis of responses to our questionnaire, student participation in the NSLP appears to have been low at schools that left the program—less than 25 percent of students received NSLP meals. Figure 1.6 shows that the average NSLP participation rate at dropout schools was lower than the average participation rate at other schools in the NSLP. This figure, however, may not be a precise representation of student participation in the NSLP at dropout schools because only about 50 percent of the dropout schools we identified provided us with data on this question. One-half of the dropout school respondents reported that records of NSLP meals served were unavailable. By comparison, the U.S. Department of Agriculture's (USDA) program data show that an average of about 58 percent of students at participating schools eat NSLP meals daily.

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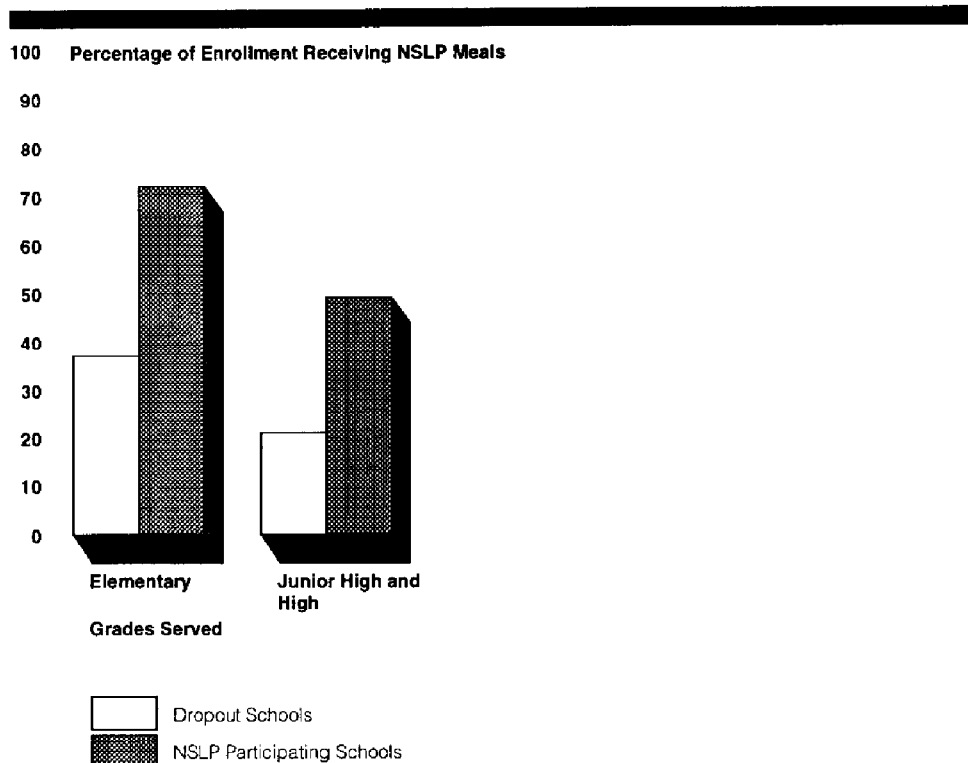
Figure 1.6: NSLP Student Participation Rates



NSLP participation rates also varied by school grade levels. As shown in figure 1.7, a higher percentage of students at elementary schools that left the program received NSLP meals than at junior high and high schools that left the program. However, participation rates at dropout schools were still lower than average participation rates at other schools in the program.

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Figure 1.7: NSLP Participation Rates, by Grades Served



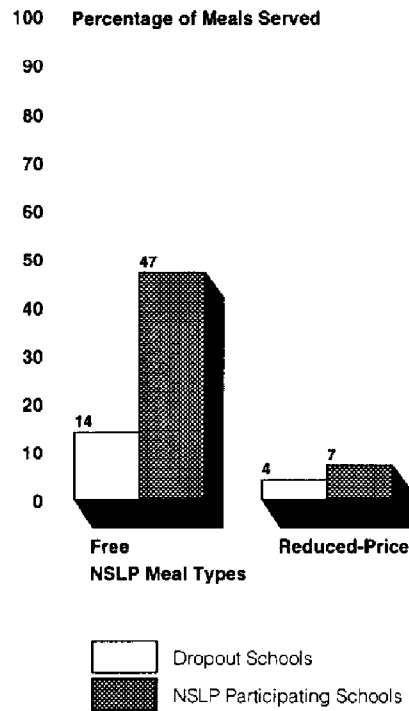
Few Free and Reduced-Price Meals Served

Schools that participate in the NSLP must provide free and reduced-price meals to children whose family income falls within certain limits. Free meals are available to children whose family income is at or below 130 percent of the poverty level, and reduced-price meals are available to children from families with incomes between 130 percent and 185 percent of the poverty level.

In addition to serving on average fewer NSLP meals, schools that left the NSLP also served fewer free and reduced-price meals relative to the average number of such meals served at schools participating in the NSLP. Figure 1.8 compares the percentage of free and reduced-price meals served at schools that left the NSLP to similar meals served at schools that participate in the program. As shown, 14 percent of NSLP meals served at the schools that left the NSLP were free, compared to 47 percent at participating schools. Also, 4 percent of the NSLP meals served at the schools that left the NSLP were reduced-price meals, compared to 7 percent at participating schools.

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Figure 1.8: Average Percentage of Free and Reduced-Price NSLP Meals Served

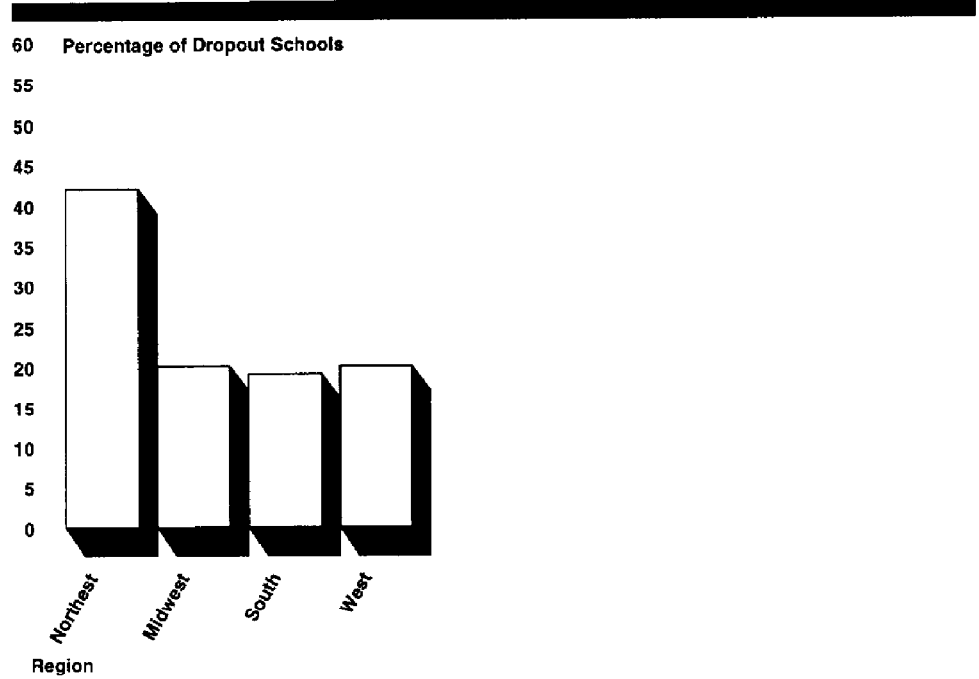


Northeast Has Largest Concentration of Schools Leaving the NSLP

The Northeast region has the largest share of schools leaving the NSLP. As shown in figure 1.9, 42 percent of all schools that left the NSLP are located in the Northeast. The remaining schools that left the NSLP are evenly distributed among the remaining three regions; each of the Midwest, South, and West regions accounts for between 19 percent and 20 percent of schools that left the program. (See app. II.)

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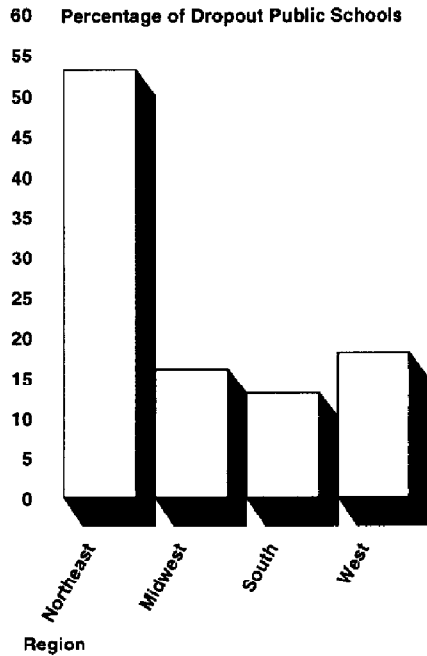
Figure 1.9: Percentage of All Schools That Left the NSLP, by Region



In addition, the Northeast region has a disproportionately higher number of public schools leaving the NSLP. The Northeast accounts for more than 50 percent of the public schools that left the program, but only 17 percent of all public schools in the country. Figure 1.10 shows the percentage of public schools that left the NSLP, by region.

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Figure 1.10: Percentage of Public
Schools That Left the NSLP, by Region



On the other hand, private schools that left the NSLP are evenly distributed across the four regions, a distribution similar to the general population of private schools that operate in the country. Each region accounts for approximately 25 percent of the private schools that left the NSLP.

Why Schools Left the National School Lunch Program

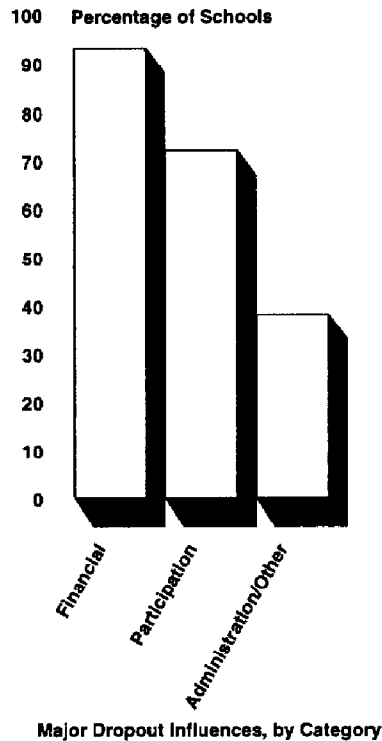
Officials of schools that left the program most frequently cited three specific reasons for leaving the program: (1) their lunch programs were losing money, (2) labor costs were high, and (3) students were interested in buying menu items prohibited by the program. Schools that addressed these concerns by leaving the NSLP generally achieved the benefits expected and have not returned to the program.

Reasons Cited for Leaving the NSLP

Our questionnaire (see app. I) asked dropout schools to rate factors that might have caused them to leave the NSLP in three categories: (1) financial reasons, (2) student participation, and (3) program administration requirements. Financial factors included in our questionnaire focused on the different areas of costs that affect the total costs of providing a school meal; student participation factors pertained to enrollment considerations and student interest in NSLP lunches; and program administration requirements focused on federal regulatory and paperwork requirements that schools have to comply with to participate in the NSLP. In each category, schools were asked to rate factors according to how strongly each one influenced their decision to leave the NSLP. As shown in figure 2.1, responding officials for 93 percent of the dropout schools cited a financial reason as a major influence on their decisions to leave the NSLP. School officials cited student participation as a major dropout influence for 72 percent of the schools and program administration for 38 percent of the schools.

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Figure 2.1: Factors That Influenced
Schools to Leave the NSLP



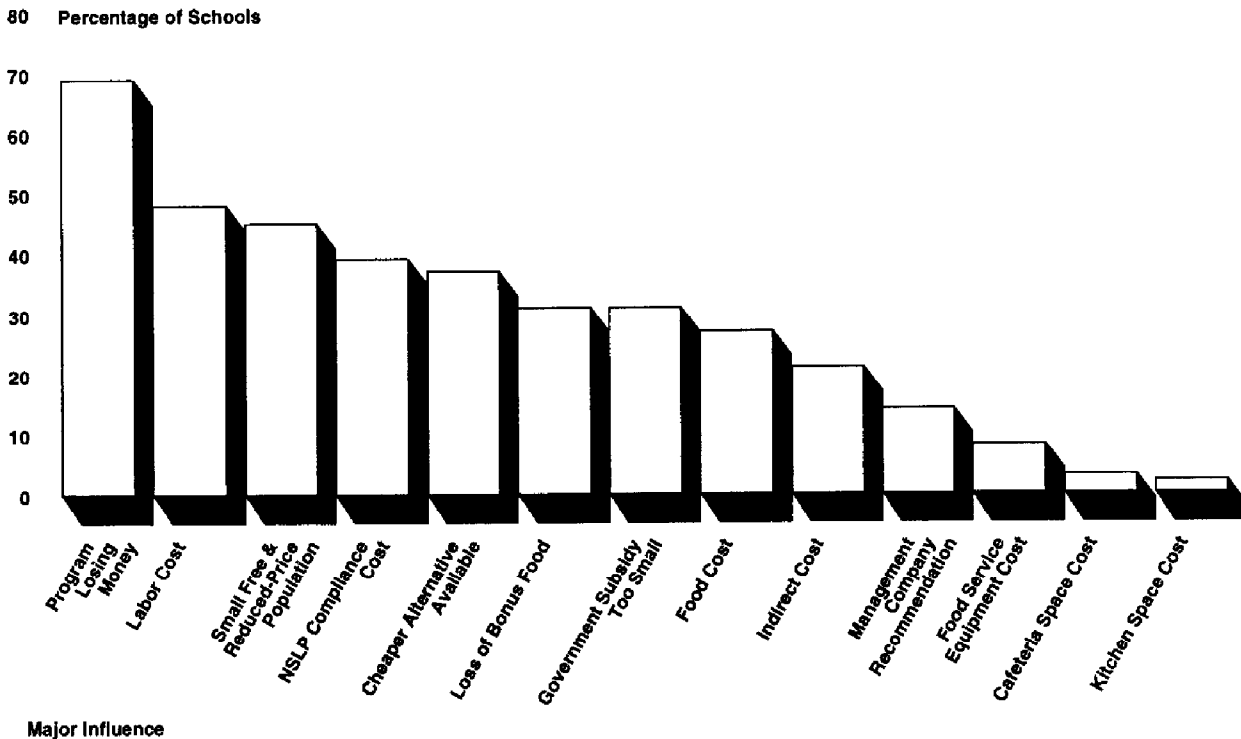
Financial Factors Causing
Schools to Leave the NSLP

The most frequent financial reason that schools cited for leaving the NSLP, as shown in figure 2.2, was that their programs were losing money. Over two-thirds of the 269 schools responding about program losses said that losses were a major influence in their decisions to leave the NSLP. Seventy-five percent of public school officials (123 of 164 schools²) cited financial losses as a major reason for leaving, while 60 percent of private school officials (63 of 105) cited financial losses as a major reason for leaving.

²One hundred sixty four public schools responded to this item, compared to the 184 public schools responding to our questionnaire, as shown in appendix I. Because just 89 percent of the public schools in our data set responded to this item, the text shows the raw numbers, in parentheses, on which our percentages were computed. In this report, whenever schools responding are less than 90 percent of the potential number of schools that could have responded to a question, we show the raw numbers used to compute percentages. We have calculated percentages on actual responses, rather than on potential responses.

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Figure 2.2: Why Schools Left the NSLP, Financial Factors



Note: See appendix I for response data on each item.

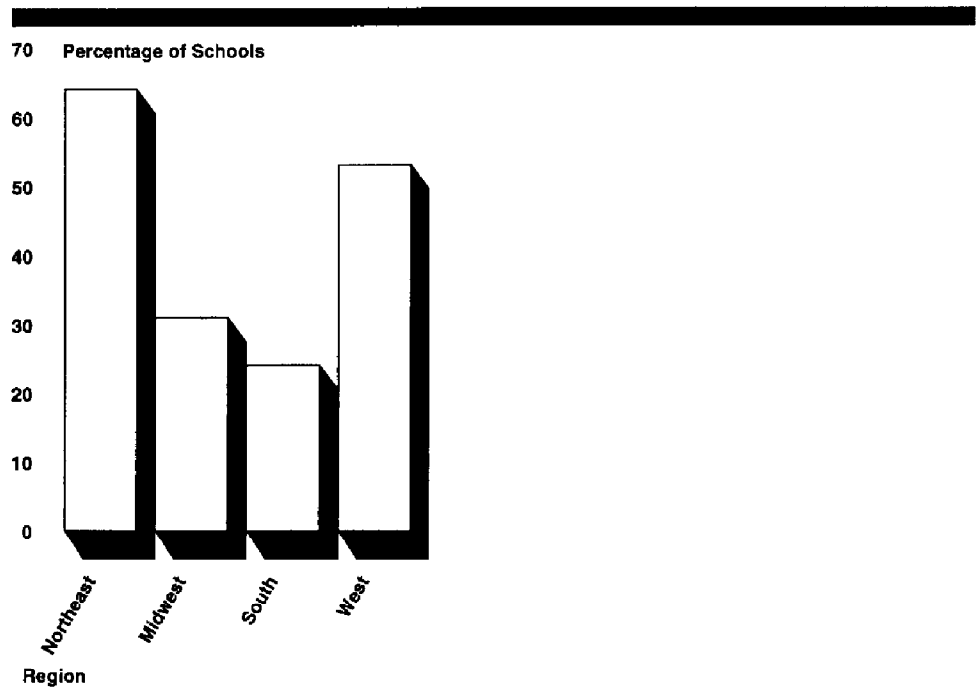
Given the choices provided, other frequently cited financial reasons for leaving the NSLP were high labor costs, small populations of students eligible for free and reduced-price meals, and the NSLP's compliance costs.

Overall, school officials rated high labor costs as a major influence in their dropout decisions for 48 percent of schools (125 of 259). However, officials rated labor costs as a major dropout influence differently between regions. More than half the labor cost responses (98 of 162) for schools in both the Northeast and West showed that labor costs were a major dropout influence. In contrast, officials rated labor costs as a major dropout influence in less than a third of the labor cost responses (27 of 97) for Midwestern and Southern schools. In a recent report, we reported

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that school meal labor costs in the Northeast and West were higher than in the Midwest and South for school year 1988-89.³ (See fig. 2.3.)

Figure 2.3: Why Schools Left the NSLP, High Labor Cost



Note: Regional percentages are based on the following data: Northeast—70 of 109; Midwest—15 of 48; South—12 of 49; and West—28 of 53.

A small population of students receiving free and reduced-price meals means that a school will receive a smaller USDA meal subsidy payment for NSLP meals. This occurs because the normal cash subsidy rate per meal (\$0.16/meal in school year 1992-93) is much smaller than the free and reduced-price subsidy rates (\$1.70/meal and \$1.30/meal, respectively, in school year 1992-93). As noted in section 1, schools that dropped out of the NSLP had generally provided few free and reduced-price meals. USDA, state, and local officials told us that a school receiving low subsidy payments may decide that the administrative burden of participating in the NSLP outweighs the value of NSLP subsidy payments. However, only

³Food Assistance: Information on Meal Costs in the National School Lunch Program (GAO/RCED-94-32BR, Dec. 1, 1993).

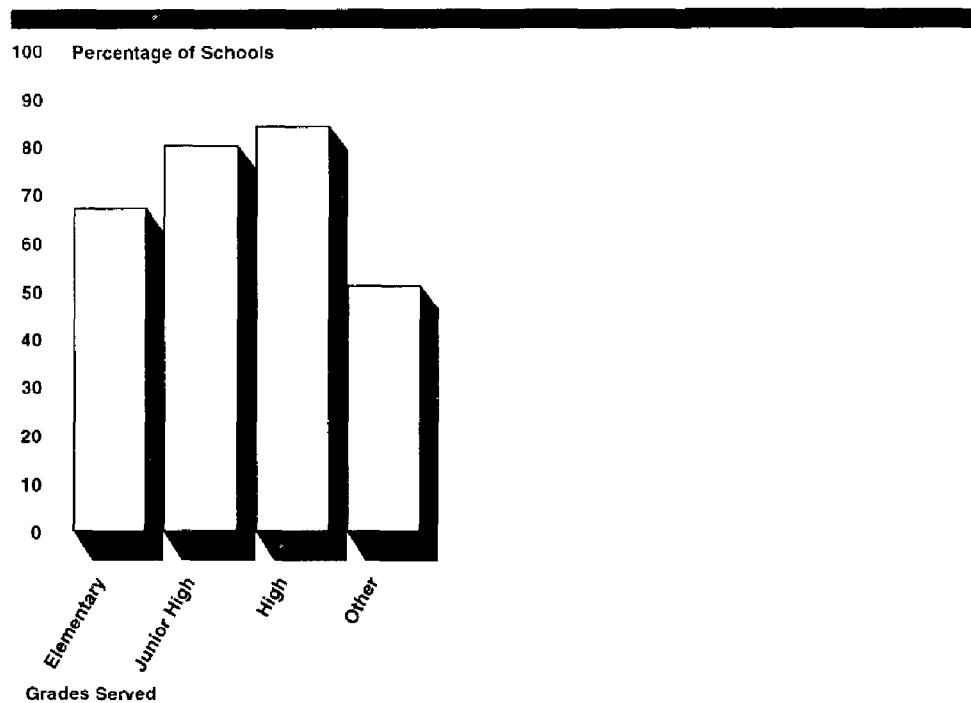
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39 percent of responding schools (100 of 259) cited compliance costs as a major factor in their decision to leave the NSLP.

Student Participation
Factors Causing Schools to
Leave the NSLP

Student participation was the second most frequently cited category—72 percent of schools overall—explaining why schools left the NSLP. However, the importance of student participation factors varied by the school grade levels served. Elementary schools cited participation factors 67 percent of the time; high schools cited these factors 84 percent of the time. (See fig. 2.4.)

Figure 2.4: Why Schools Left the NSLP, Student Participation Factors, by Grade

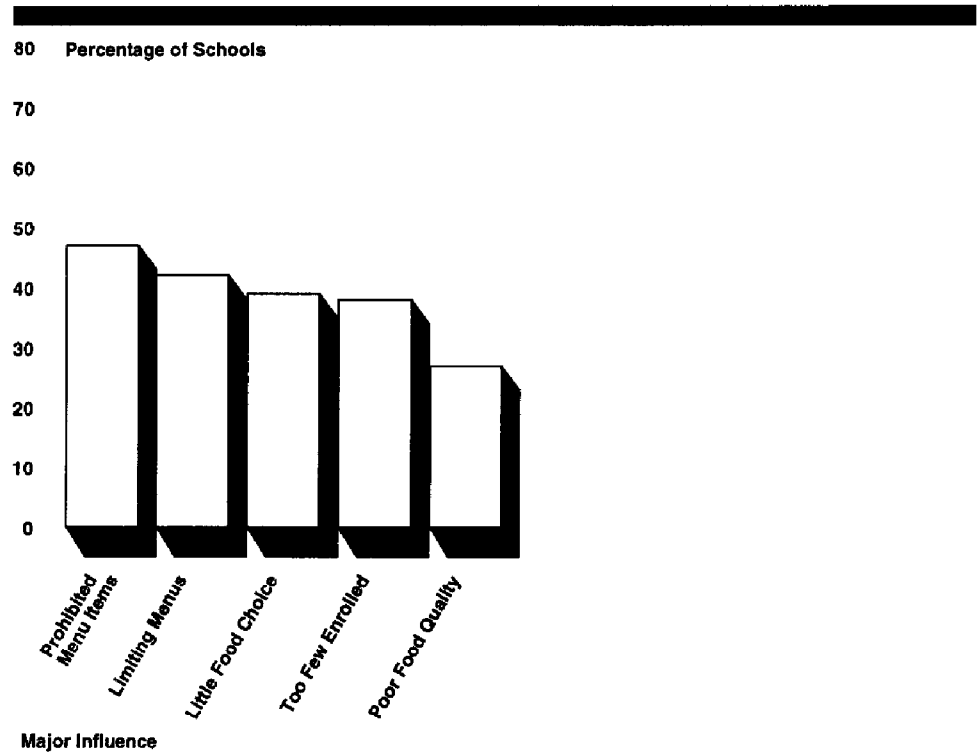


The leading single participation factor explaining school withdrawals from the NSLP was prohibited menu items. (See fig. 2.5.) Student interest in menu items prohibited by the NSLP was cited by 47 percent of schools (121 of 257) as a major reason for leaving the NSLP. Schools rated this the third highest major dropout factor among all the choices presented in our questionnaire. The NSLP prohibits sale of foods with minimal nutritional

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value during meal periods, including soda and certain candies. Some respondents and state officials noted that soda sales were important to students. Public and private schools differed widely on the importance they attached to the sale of NSLP-prohibited foods. For public schools, the sale of prohibited foods was the most important participation factor influencing a school to leave the NSLP. Sixty percent of public schools (95 of 159) cited it as a major reason to leave, compared to 27 percent of private schools (26 of 98).

Figure 2.5: Why Schools Left the NSLP, Participation Factors



Note: See appendix I for response data on each item.

Ninety-nine schools reported leaving the NSLP because they had too few students enrolled. This factor was the most frequently cited participation reason for private schools leaving the NSLP. Among private schools, 44 percent of respondents (44 of 99) cited too few students as a major

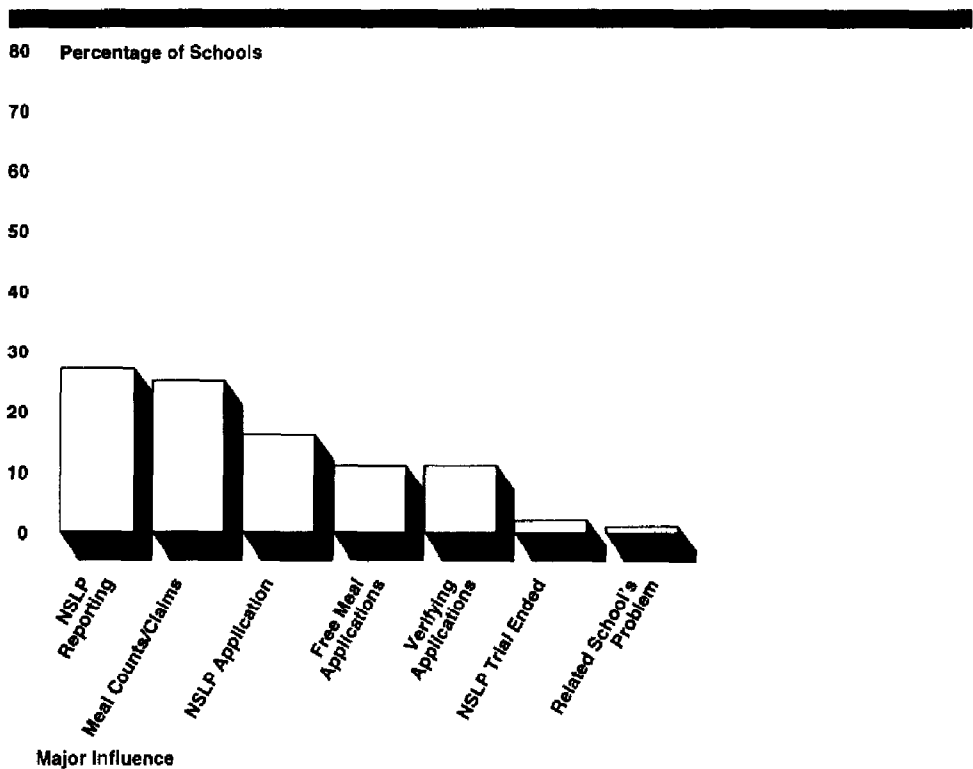
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reason for leaving the NSLP. However, 34 percent of public schools (55 of 160) rated it as a major influence in deciding to leave the NSLP.

Administrative Reasons for Schools to Leave the NSLP

Schools cited administrative factors as major reasons for leaving the NSLP much less often than they cited financial or participation factors. Among administrative factors, NSLP's reporting requirements were cited most often as a major administrative reason for leaving the program, but they were cited by just 26 percent of schools. (See fig. 2.6. For response data, see app. I.) Meal counting and claiming was cited by 25 percent of schools, and the NSLP application was cited by 16 percent of schools.

Figure 2.6: Why Schools Left the NSLP, Administrative Factors



Note: See appendix I for response data on each item.

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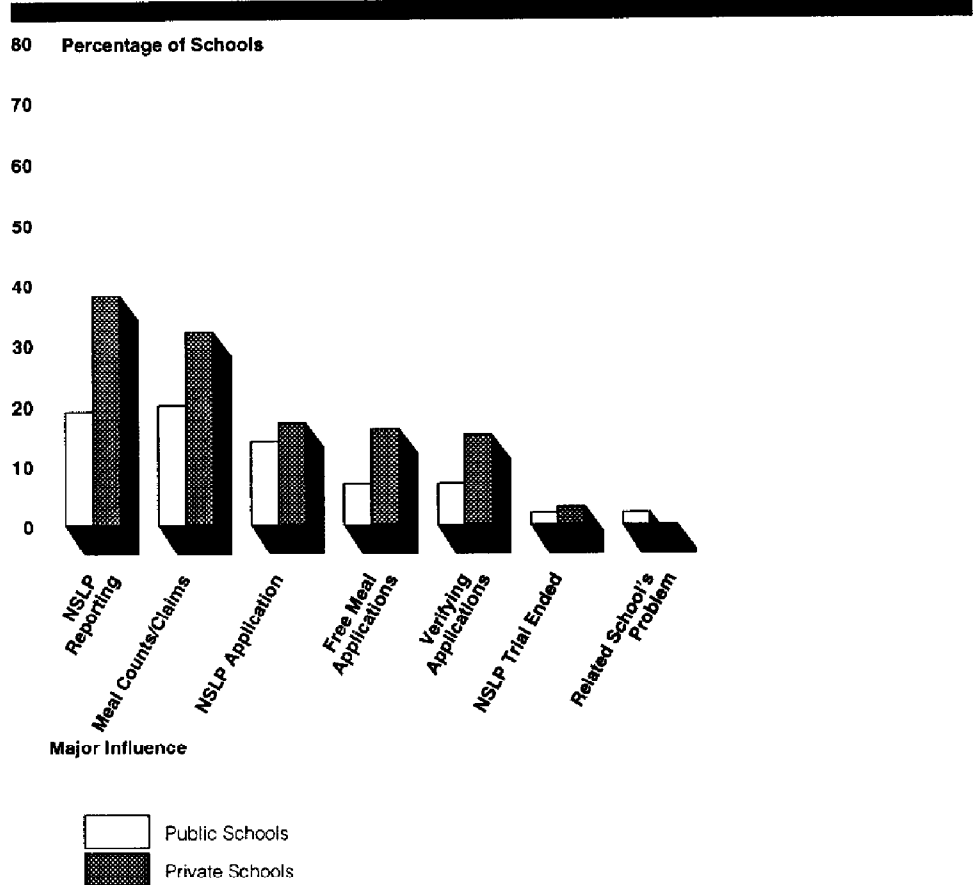
Private schools, more than public schools, rated administrative matters as major factors in deciding to leave the NSLP. (See fig. 2.7.) For example, 39 percent of private schools (39 of 101), compared to 19 percent of public schools (30 of 159), said that NSLP reporting was a major reason for leaving the NSLP. Also, 33 percent of private schools (33 of 101), compared to 20 percent of public schools (33 of 161), said meal counting and claiming was a major reason for leaving the NSLP.

Schools seldom selected free and reduced-price meal applications as major factors influencing them to leave the NSLP. For example, 11 percent of schools (29 of 261) selected free meal application processing as a major dropout decision factor. Likewise, 11 percent of schools (28 of 260) selected verifying applications as a major dropout decision factor. Since schools that left the NSLP appeared to serve fewer free or reduced-price meals than NSLP schools on average, they may have had fewer students who submitted meal applications.

Private schools were more likely than public schools to cite application paperwork as a major dropout decision factor. For instance, 17 percent of private schools (17 of 101) cited free meal application processing as a major dropout factor. Sixteen percent of private schools (16 of 100) cited verifying meal applications as a major dropout influence. However, only 8 percent of public schools (12 of 160) cited application processing as a major dropout factor. Similarly, 8 percent of public schools (12 of 160) cited verifying meal applications as a major dropout influence.

Section 2
Why Schools Left the National School Lunch Program

Figure 2.7: Why Schools Left the NSLP, Major Administrative Factors, Public V. Private Schools



Note: Besides data described above, the following responses were used for this table:

NSLP Application
 — 23 of 160 public schools
 — 18 of 100 private schools

NSLP Trial Ended
 — 3 of 150 public schools
 — 3 of 94 private schools

Related School's Problem
 — 3 of 156 public schools
 — 0 of 94 private schools

Other Reasons Why Schools Left the NSLP

Among the schools analyzed, we identified 12 schools that left the NSLP, apparently without planning to withdraw permanently from the program. For example, one school left temporarily by failing to file its application.

Section 2
Why Schools Left the National School Lunch
Program

Four reported leaving for building renovations or equipment replacements. Of the 12 schools, 6 returned to the program, 1 expected to return, and 3 of the remaining 5 could not return because they were ineligible.

Expected Benefits
From Leaving the
NSLP Often Achieved

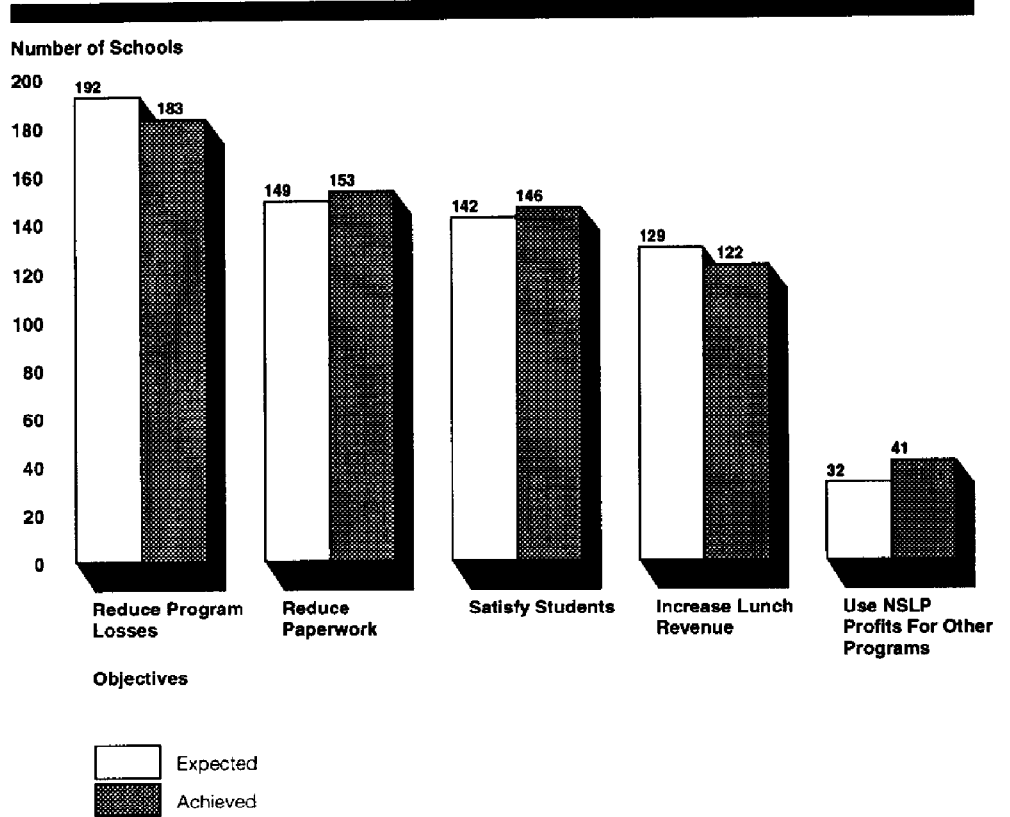
Schools often achieved the benefits that they expected from leaving the NSLP and usually did not return to the program during the period covered by our questionnaire.

School Expectations
Satisfied

The benefits that schools expected to achieve by dropping out of the program and the benefits they achieved are shown in figure 2.8. Note that some respondents apparently achieved unexpected benefits from leaving the NSLP; therefore, the number of schools achieving a benefit was sometimes greater than the number of schools expecting to achieve that same benefit. (See app. I for specific response frequencies on schools' expectations of and achievements in connection with NSLP withdrawals.)

**Section 2
Why Schools Left the National School Lunch
Program**

Figure 2.8: Benefits in Leaving the NSLP, Expected and Achieved



Few Dropout Schools Returned to the NSLP

Decisions to leave the NSLP are rarely reversed after a school leaves the program. About 90 percent of our respondents—273 schools—reported that they had not returned to the NSLP. However, 22 schools have re-entered the NSLP, and 11 schools expect to return to the NSLP.

Meal Services and Policies After Schools Left the National School Lunch Program

Most dropout schools we identified continue meal services and policies similar to those followed while they participated in NSLP. More than 70 percent of schools continued to offer some type of meal service after they withdrew from the NSLP. These schools that continue to offer meal services generally provide benefits comparable to those under the NSLP: (1) free and reduced-price meal benefits to students who would have qualified for such meals under the NSLP, (2) school lunches that follow a meal pattern guideline, and (3) modified meals for students with disabilities or other special dietary needs. Many of the dropout schools also maintain policies that avoid overt identification of students receiving free or reduced-price meals.

Availability of a Continued School Lunch Program

Of the 302 schools that left the NSLP, 215 (about 70 percent) continue to serve daily lunches. Food services available may include combinations of traditional cafeteria lines, food courts, vending machines, salad bars, and caterers. Food service is generally provided by school food service staff, food service management companies, and/or specialty contractors.

Types of Lunch Service Available

Almost 60 percent of the 215 schools that continued to offer daily lunch services operate a traditional cafeteria. Traditional cafeterias allow students to purchase a standard lunch and/or à la carte lunch items. Standard lunches can provide students with a meal consisting of a meat or meat substitute, vegetables and fruit, bread or bread alternative, and a beverage. Under à la carte systems, students can determine their meals by purchasing items individually.

Approximately 23 percent of public dropout schools and 32 percent of private dropout schools (a total of 81 schools) stopped offering daily lunch service. About 85 percent of dropout schools that stopped offering daily meals serve elementary students.

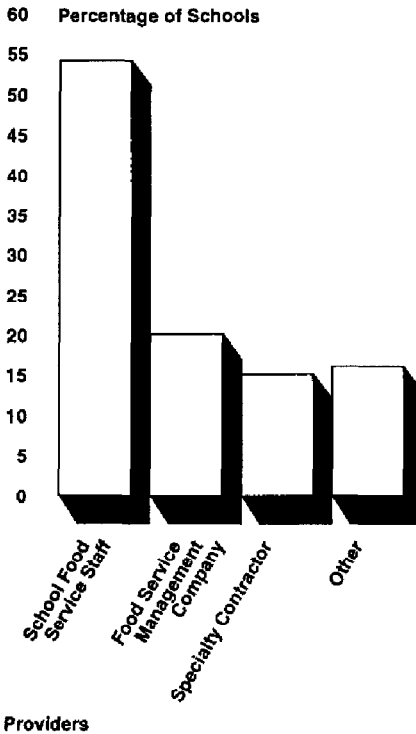
School Lunch Service Operators

More than half of dropout schools that continue daily lunch service use the school's food service staff to manage their food service operations. However, 20 percent of dropout schools contract with an independently owned food service management company. The companies may provide any or all of the following: meal program advertising or marketing; purchasing, preparing, and serving food; providing nutrition education; and providing free or reduced-price lunches for eligible students. Less than 20 percent of dropout schools use specialty contractors, that is, fast food

Section 3
Meal Services and Policies After Schools
Left the National School Lunch Program

restaurants that specialize in pizza, hamburgers, tacos, or deli sandwiches.
(See fig. 3.1)

Figure 3.1: Lunch Service Providers



Availability of Benefits Comparable to Those Under the NSLP

Schools that leave the NSLP generally continue to (1) provide benefits for students eligible for free and reduced-price NSLP lunches, (2) serve lunches that follow a meal pattern guideline, and (3) make modified meals available for students who are unable to consume regular lunches. Many schools also maintain policies that prevent the overt identification of students receiving free and reduced-price meals.

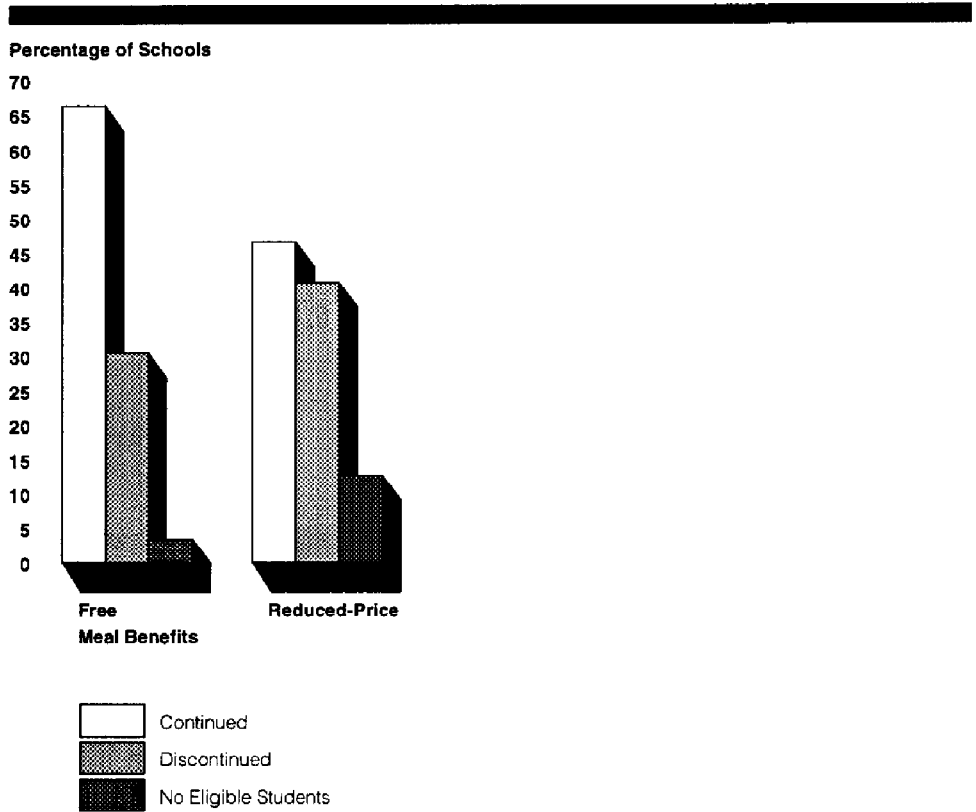
Free and Reduced-Price Meal Benefits Available

More than 65 percent of the dropout schools that continue daily lunch service offer free meal benefits, and almost 50 percent offer reduced-price meal benefits to students. Figure 3.2 shows the percentage of schools offering free or reduced-price meal benefits to eligible students, the percentage of schools that discontinued these meal benefits, and the

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percentage of schools reporting that they had no students who would have been eligible for such NSLP meal benefits.

Figure 3.2: Free and Reduced-Price Meal Benefits



At dropout schools that do not provide free or reduced-price meal benefits, students are responsible for their own lunches, or they can earn a free or reduced-price lunch by working at school. On the basis of responses to our questionnaire, schools that discontinued free or reduced-price meal benefits served very few free and reduced-price meals when they participated in the NSLP. On average, schools discontinuing free meal benefits served less than 15 percent of their lunches free under the NSLP. Schools discontinuing reduced-price meal benefits served less than 5 percent of their lunches at a reduced price under the NSLP.

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Left the National School Lunch Program

This, however, may not be a precise representation of the percentage of free and reduced-price meals served at schools that discontinued such meal benefits because not all of these schools provided information on the number of free and reduced-price meals that were served under the NSLP. Of the 55 schools that do not provide free meal benefits, only 25 schools, or 45 percent, provided information on the number of free meals served. And of the 76 schools that do not provide reduced-price meal benefits, only 44 schools, or 58 percent, provided information on the number of reduced-price meals they served while in the NSLP.

About 30 percent of school officials reported that students eligible for free meals are now responsible for supplying their own meal, and 39 percent of school officials reported that students eligible for reduced-price meals are now responsible for their own meal.

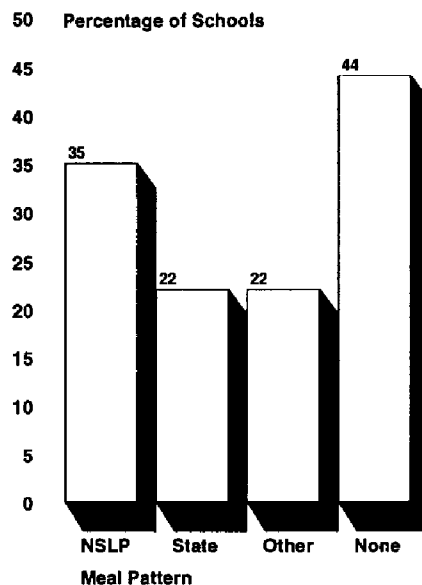
Meal Pattern Guidelines
Followed

Meal pattern guidelines are the standards followed by schools for planning meals. Meal patterns can include the types of food to be offered, the minimum nutrient content of the meal, and serving sizes. For example, NSLP's meal pattern guidelines are designed to provide students with a balanced meal satisfying approximately one-third of the Recommended Daily Dietary Allowances for children. The NSLP's reimbursable meals provide one serving of meat or meat alternative, two servings of vegetables or fruits, one serving of bread or a bread alternative, and fluid milk. Responses to our survey indicate that dropout schools are following a variety of meal planning guidelines.

Almost 60 percent of dropout schools that continue daily lunch service retain one or more meal pattern guidelines. These schools apply the NSLP's, the state's, and/or another type of meal standard to school lunches. Some schools also establish informal criteria for the items and types of meals served. Figure 3.3 shows the percentage of schools following the NSLP's, the state's, and/or other meal guidelines and the percentage of schools which reported that lunches do not follow any formal meal pattern guideline. As indicated, about 35 percent of schools continuing daily lunch service retain the NSLP's meal standards.

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Meal Services and Policies After Schools
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Figure 3.3: Meal Pattern Guidelines Followed by Dropout Schools



Note: Percentages do not sum to 100 because schools may apply more than one meal pattern guideline to lunches.

As indicated in figure 3.3, 44 percent of dropout schools continuing daily lunch service reported that lunches do not follow any recognized nutritional or meal pattern guidelines. More than 60 percent of these schools are high schools, and almost 60 percent serve public school students. The meals may not follow formal meal pattern guidelines, but some school officials reported that they try to provide high-quality, nutritious food items or follow minimum nutritional standards. For example, one school reported using lean meats, baking instead of frying items, and serving fruit, salads, fruit juices, and bottled water.

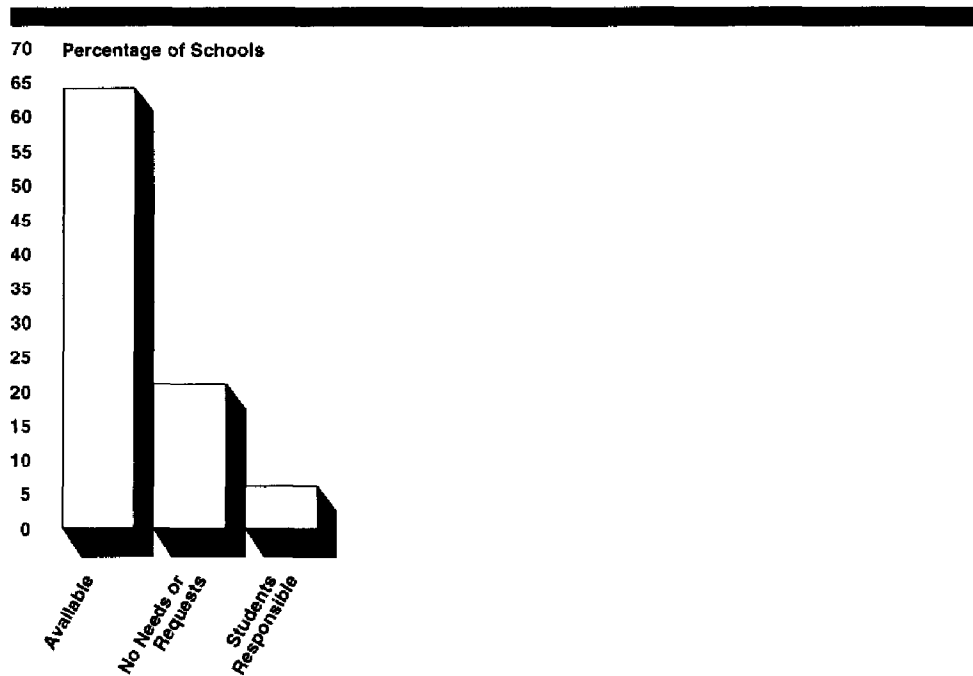
Modified Meals Available for Students With Disabilities or Special Dietary Needs

The NSLP's regulations require schools to make substitutions to the lunch pattern requirements for students whose disabilities restrict their diets. Schools may also make substitutions for nondisabled students who are unable to consume the regular lunch because of medical or other special dietary needs. In addition, schools may make substitutions available to meet students' ethnic and religious needs.

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Meal Services and Policies After Schools
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Most dropout schools that continued providing meal service try to accommodate students' special dietary needs. As shown in figure 3.4, 63 percent of schools make substitutions available for students who are unable to consume certain meal components; however, 21 percent of schools reported not having students who need or request a modified meal. About 6 percent of schools reported that students with special dietary needs were responsible for supplying their own meals. About 10 percent of schools did not report why modified meals for students with special dietary needs were not available.

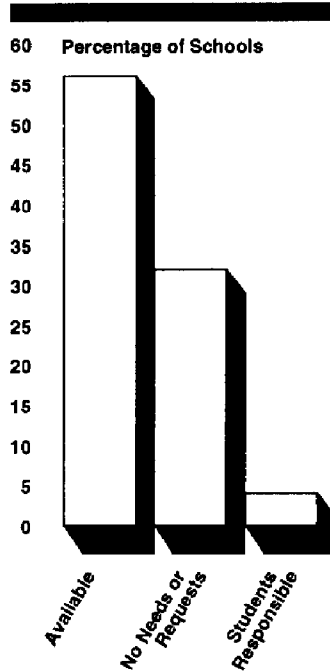
Figure 3.4: Percentage of Schools Providing Modified Meals for Students With Special Dietary Needs



Many dropout schools that continued to serve lunches reported that modified meals are available for students with physical disabilities. As shown in figure 3.5, 56 percent of schools provide modified meals, and 32 percent either do not have any requests for modified meals or provide them only when a student requests one. About 4 percent of schools reported that, if disabled students could not consume a regular meal, they were responsible for supplying their own. About 8 percent of schools did

not report why modified meals for students with disabilities were not available.

Figure 3.5: Percentage of Schools Providing Modified Meals for Students With Disabilities



Policies for Avoiding Overt Identification Retained

The NSLP's regulations require schools to comply with certain nondiscrimination practices that prevent the overt identification of students receiving free and reduced-price meals. Students receiving such meals cannot be overtly identified by the use of special tokens or tickets, or by any other means. Students receiving discounted lunches cannot be required to use a separate lunch area or go through a separate serving line to receive their meals. These students must also have the same choice of meals that is available to those students who pay full price.

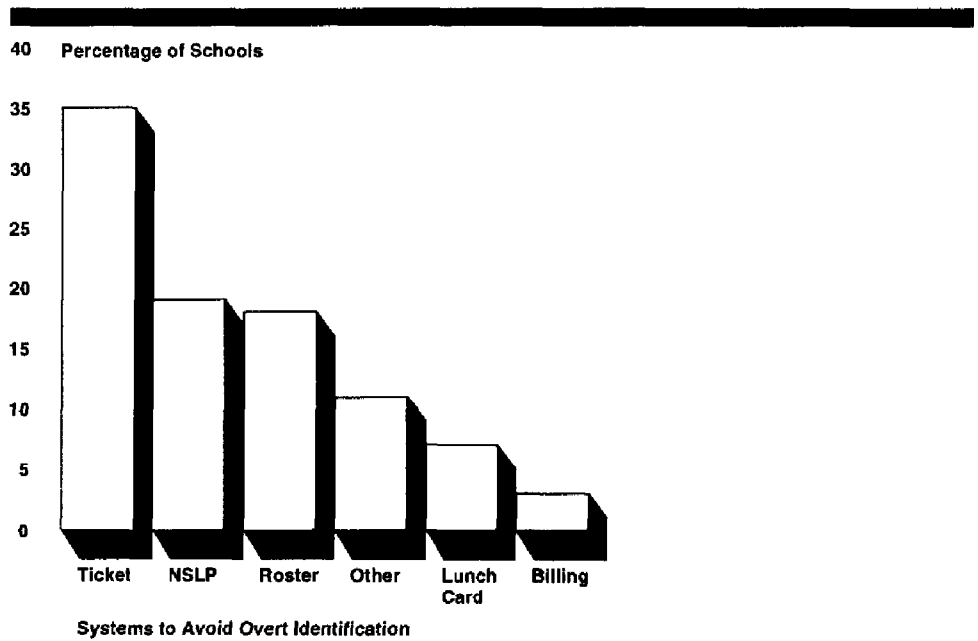
Ticket systems are most often used by dropout schools to ensure that students receiving free and reduced-price meals are not overtly identified by other students. In ticket systems, the school sells lunch tickets at full or reduced-price to any student who wants them, and students eligible for free lunches receive their meal tickets at no cost. The tickets can be used to purchase a standard lunch. In addition to ticket systems, schools also use roster systems, provide student lunch cards, or establish special billing

Section 3
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Left the National School Lunch Program

arrangements with the parents. In roster systems, the cashier keeps a list of all students that identifies their eligibility status for a free or reduced-price meal. When the student takes the meal, the cashier checks the student's name off the list.

Of the 215 dropout schools that continued to serve lunches, 107, or 50 percent, reported on their current policy for avoiding overt identification. Of these schools, 35 percent use ticket systems, 19 percent maintained the same policy that was used when the school participated in the NSLP, and 18 percent use roster systems. Only 7 percent reported that their school had no measures designed to avoid the overt identification of students receiving free and reduced-price lunches. Figure 3.6 shows the distribution of schools by the type of policy used.

Figure 3.6: Systems Used to Avoid Overt Identification



Note: Eight dropout schools (7 percent) reported not retaining a policy to prevent the overt identification of students receiving free and reduced-price meals.

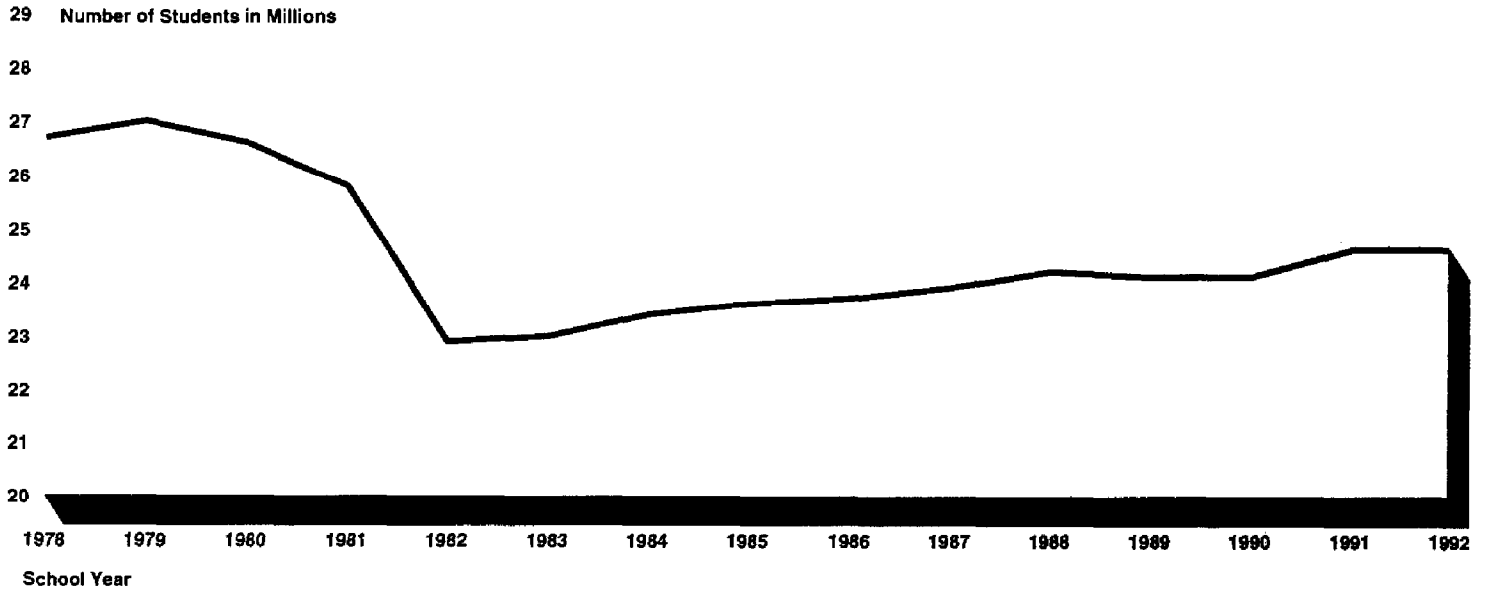
The National School Lunch Program

The National School Lunch Program, authorized by the National School Lunch Act of 1946, is the oldest and largest of the child nutrition programs administered by USDA's Food and Nutrition Service. The program's goals are to safeguard the health and well-being of the nation's children and encourage the domestic consumption of agricultural commodities. Schools are not required to participate in the lunch program. However, schools that choose to take part in the lunch program receive cash subsidies and donated food from USDA. In return, schools must serve lunches that meet various federal requirements, such as offering free and reduced-price lunches to eligible children and ensuring that lunches meet specific meal patterns.

On a typical school day, an estimated 25 million children at 93,000 schools receive lunch through the NSLP. Program participants include public schools, nonprofit private schools, and residential child care institutions. Public school participation is high—81,000 public schools or 95 percent of all public schools participate. In contrast, about 6,400 private schools—less than 30 percent of private schools—participate in the program. About 5,300 residential child care institutions participate. Figures 4.1 and 4.2 show average student and school participation for the past 15 years.

Section 4
The National School Lunch Program

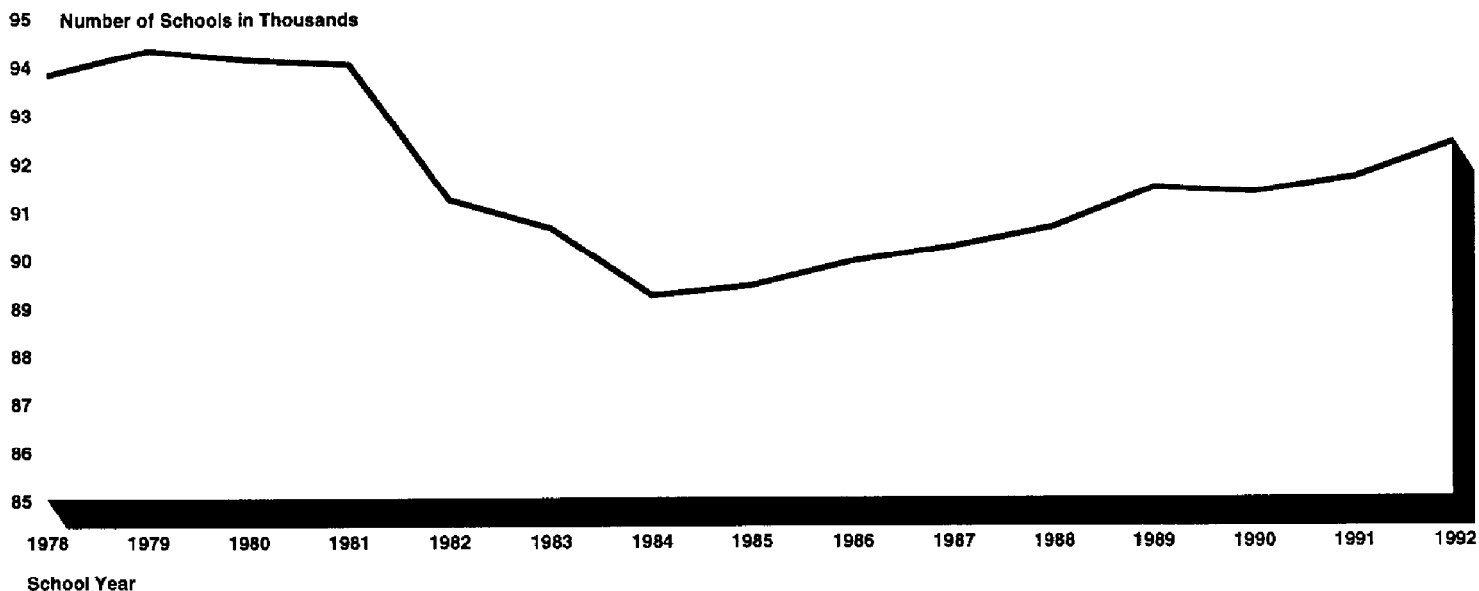
Figure 4.1: Average Daily NSLP Student Participation, 1978-92



Source: GAO's analysis of FNS' data.

Section 4
The National School Lunch Program

Figure 4.2: Annual NSLP School Participation, 1978-92



Source: GAO's analysis of FNS' data.

Some schools have never taken advantage of their NSLP eligibility, while others have tried the program and decided not to continue. In 1982, program participation fell by about 2,800 schools after the 1980 and 1981 Omnibus Budget Reconciliation Acts' budget cuts. The acts, among other things, sought to reduce federal expenditures for the NSLP by tightening eligibility criteria for schools and students and decreasing federal reimbursement rates for free, reduced-price, and full-price lunches.

Despite an increase in net program participation between 1989 and 1993, the American School Food Service Association reported concern about the number of schools leaving the NSLP in the early 1990s. In 1992 testimony, Association officials reported that if federal policies did not change, the current level of school dropouts would be the first wave of a national trend. In 1993, the Association testified that about 200 schools discontinued their participation in the school lunch program between 1989 and 1993.

Objectives, Scope, and Methodology

In response to concerns that schools may be withdrawing from the National School Lunch Program and to prepare for the upcoming hearings on reauthorizing child nutrition programs, the Chairman and the Ranking Minority Member of the House Committee on Education and Labor, and the Chairman of the Committee's Subcommittee on Elementary, Secondary, and Vocational Education, asked us to provide information on the (1) number of schools that withdrew from the program, (2) characteristics of schools that withdrew, (3) why schools withdrew, and (4) lunch services offered at the schools after they withdrew. By agreement with the requesters, we focused on schools that have dropped out of the NSLP since the start of school year 1989-90.

To accomplish these objectives, we gathered information from USDA's Food and Nutrition Service, state officials responsible for administering the NSLP, schools that have dropped out of the program, and an official of a private food service management company which serves schools that have left the NSLP. For information on schools, we also obtained reports from the U.S. Department of Education.

At FNS we interviewed headquarters and regional office officials to determine what information FNS maintains on schools that have dropped out of the NSLP. FNS also provided reports on NSLP school participants and program costs.

In each state, we interviewed an NSLP program official. We also asked each state to furnish a list of the schools in its jurisdiction that had left the NSLP since July 1989. From data furnished primarily by the state NSLP officials, we compiled a nationwide list of 352 school food authorities that may have removed schools from the NSLP.

To obtain information on what factors have led schools to drop out of the NSLP, we mailed questionnaires to each of the 352 SFAs identified. Our questionnaire asked school officials to describe their schools, identify and rank factors that led them to remove schools from the NSLP, and describe the lunch services offered at the schools after they left the NSLP. We received responses from 308 of the 352 SFAs. We received useful data for analysis from 208 SFAs on 302 schools that dropped out of the NSLP. Of the remaining SFAs:

- 100 reported they had been inappropriately identified and did not belong in our universe of dropout schools,
- 38 did not respond at all, and

- 6 responded, but not in time to be considered in our analysis.

We used two statistical analysis computer programs to tabulate survey responses and examine patterns in dropout school characteristics and meal arrangements. Appendix I is a copy of the questionnaire used to gather information from dropout schools, including a summary of responses by question. As shown in the appendix schools did not always answer each and every applicable question. We calculated percentages on the basis of total responses to each question, although response rates varied between questions. Where lack of response could be significant, we noted it in the text or disclosed the specific data on which our analyses are based.

We did not survey schools that remained in the NSLP to find out how often conditions that led some schools to withdraw from the NSLP also exist at NSLP schools. Readers should not infer that conditions that led some schools to drop out of the NSLP are more likely to exist at dropout schools than at participating schools.

We visited five schools that had dropped out since 1989 to obtain first-hand information on their reasons for dropping out of the NSLP. We also visited five additional schools to pretest our questionnaire.

We performed our work from September 1992 through October 1993, in accordance with generally accepted government auditing standards.

Questionnaire and Schools' Responses

United States General Accounting Office

GAO

Survey on Schools That Withdrew From The National School Lunch Program (NSLP)

INTRODUCTION

The U.S. General Accounting Office (GAO) is an agency of the Congress which reviews federal programs. At the request of two Congressional committees, GAO is conducting a study of schools which have withdrawn from the National School Lunch Program (NSLP).

The purpose of this questionnaire is to obtain background data on the schools, identify the factors which led individual schools to withdraw from the NSLP and determine what lunch services were offered after they withdrew from the program. This questionnaire is being sent to school food authorities which have one or more schools that withdrew from the NSLP in school years 1989-90, 1990-91, 1991-92 or 1992-1993.

Your cooperation in completing this questionnaire is vital to our study. The information collected through this survey along with other information will be summarized in our report to the Congress.

Please complete the survey and return it no later than **March 31, 1993**. We have provided a postage-paid business reply envelope to facilitate the return of your questionnaire. In the event that the return envelope is misplaced, please send the completed survey to:

U.S. General Accounting Office
Attn: Rick Calhoon
200 W. Adams St., Suite 700
Chicago, IL 60606

If you have any questions, please call Rick Calhoon or Janina Johnson toll free at 1-800-333-4524.

Please note that throughout this questionnaire the acronym NSLP stands for the National School Lunch Program. Questions apply only where NSLP operations ended, even though regular classes continued. This questionnaire **DOES NOT** apply to schools that withdrew from the NSLP because the schools were closed, destroyed, or consolidated with other schools which participate in NSLP.

Sections I through V of this questionnaire should be completed on a school-by-school basis. We have provided enough forms for you to complete information for three schools. If you have more than three schools within your school food authority that withdrew from the NSLP and need more forms, please make additional copies and complete them for each additional school. Please attach all copies to the end of this questionnaire.

Place Mailing Label/ID # Here

**Appendix I
Questionnaire and Schools' Responses**

**GENERAL INFORMATION ON SCHOOL FOOD
AUTHORITY/DISTRICT INFORMATION**

1. Are there any schools within your school food authority that have withdrawn from the National School Lunch Program (NSLP) in school years 1989-90, 1990-91, 1991-92 or 1992-1993? (Note: School year means a period of 12 calendar months beginning July 1 of any year and ending June 30 of the following year.) In some cases, a school may have left the NSLP and later returned. For purposes of this questionnaire, please consider such schools as withdrawn schools. (Check one.)

208 Yes ———→please continue.
0 No ———→**STOP!! Please follow the instructions in the box below.**

If there are no schools within your school food authority that have withdrawn from NSLP **DO NOT** answer the questions on this questionnaire. However, please provide us with your name, address and telephone number in Section VI "Concluding Information", and return the entire questionnaire to the address listed on the first page.

2. How many of your schools withdrew from the NSLP for school years 1989-90, 1990-91, 1991-92 and 1992-1993?

49 School year 1989-1990
84 School year 1990-1991
114 School year 1991-1992
55 School year 1992-1993

3. What was the total number of schools within your school food authority during the schools years indicated below?

889 School year 1989-1990
905 School year 1990-1991
907 School year 1991-1992
917 School year 1992-1993

4. Do you anticipate any more schools within your district withdrawing from the NSLP in the future? (Check one.)

12 Yes ———→please explain why in the space provided below.

196 No

5. For those schools that remained in the NSLP, briefly tell us the reasons why these schools remained in the NSLP.

147 Not applicable

6. Would you like to be placed on a distribution list to receive a copy of our report when it is issued? (Check one.)

116 Yes

61 No

Appendix I
Questionnaire and Schools' Responses

***INDIVIDUAL SCHOOL INFORMATION ***

SECTION I: BACKGROUND INFORMATION

The following set of questions should be answered on a school-by-school basis.

7. Name of school:

8. What is the zip code of this school?

9. Which of the following best describes this school? After the appropriate category, please indicate the grades served in this school. (Check one.)

- 1 Pre-kindergarten
- 0 Kindergarten
- 128 Elementary (grades: _____)
- 21 Junior high (grades: _____)
- 115 High school (grades: _____)
- 37 Other (please specify) _____)

10. Is this school public? (Check one.)

- 184 Yes
- 118 No

11. When was the last month for which the school claimed NSLP reimbursement?

12. What was the total enrollment of students in this school when it withdrew from the NSLP?

 158,362

13. For the last full school month in which this school was still enrolled in the NSLP, what was the total number of meals served? In the space provided below, please indicate the total number of NSLP *paid meals, free meals, reduced-price meals* and an *estimated number of non-NSLP meals* that were served at this school.

 144 Records Not Available

345,623 Paid meals

57,313 Free meals

14,842 Reduced-price meals

378,168 Estimated Non NSLP meals served (e.g., salad bar, a la carte, etc.)

26,000 Daily average of NSLP meals

SECTION II: FACTORS INFLUENCING DECISION TO WITHDRAW FROM THE NSLP

14. In the table on the next page, indicate how much influence each of the listed factors contributed to the decision to withdraw this school from the NSLP. Indicate your response by placing a check mark in the box that represents your answer. Please do not leave any lines blank.

CONTINUE TO NEXT PAGE →

**Appendix I
Questionnaire and Schools' Responses**

Factors Influencing Decision To Withdraw From The NSLP

Factors	Check One					
	No Influence (1)	Little Influence (2)	Moderate Influence (3)	Major Influence (4)	No Basis To Judge (5)	Missing (6)
Financial						
1. High food costs	81	39	54	70	15	43
2. Food cost increases due to bonus commodity reductions	68	47	34	80	27	46
3. High labor costs	54	27	39	125	14	43
4. High cost of cafeteria space	177	35	17	7	19	47
5. High cost of food service equipment	141	56	20	20	17	48
6. High indirect costs	103	51	28	55	19	46
7. High cost of kitchen space	183	35	14	4	19	47
8. High cost of complying with program rules	64	28	50	100	17	43
9. Program was losing money	44	14	21	186	4	33
10. Food service management company recommended leaving NSLP for financial reasons	144	6	25	36	41	50
11. Cheaper alternative program available	96	16	26	97	25	42
12. Government reimbursements inadequate	70	35	57	79	15	46
13. Free & Reduced-price population too small	56	25	49	116	11	45
14. Other (please specify)	7	2	1	35	7	250
Student Participation						
15. Too few students enrolled to support program	81	25	46	99	8	43
16. Student disinterest due to poor food quality	115	33	33	71	7	43

**Appendix I
Questionnaire and Schools' Responses**

Factors Influencing Decision To Withdraw From The NSLP (continued).

Factors	Check One					Missing (6)
	No Influence (1)	Little Influence (2)	Moderate influence (3)	Major Influence (4)	No Basis To Judge (5)	
17. Student disinterest due to limited food choices	62	36	54	103	6	41
18. Student disinterest due to menu requirements	57	23	58	110	13	41
19. Student interest in menu items prohibited by NSLP	55	25	35	121	21	45
20. Other (please specify)	4	6	0	17	8	267
Administrative/Other						
21. Processing students' free and reduced-price meal applications	118	65	39	29	10	41
22. Verifying students' free and reduced-price meal applications	122	59	41	28	10	42
23. Meal counting and claiming	95	49	44	66	8	40
24. Program application requirements	101	47	61	41	10	42
25. Program reporting requirements	90	43	46	69	12	42
26. NSLP satisfactory at this school, but school district directed withdrawal from NSLP because of problems at other schools in the same district	174	12	5	3	56	52
27. End to temporary NSLP experiment	161	9	4	6	64	58
28. Other (please specify)	10	3	1	22	7	259

Appendix I
Questionnaire and Schools' Responses

**SECTION III: LUNCH SERVICES OFFERED
AFTER THIS SCHOOL LEFT THE PROGRAM**

Remember: In some cases, a school may have left the NSLP and later returned. For purposes of this questionnaire, please consider such schools as withdrawn schools.

15. Are lunch services offered daily in this school?
(Check one.)

- 215 Yes
 81 No ———> skip to question #25

16. Indicate the types of food service available for students in this school. (Check all that apply.)

- 122 Traditional cafeteria
 72 Salad bar
 49 Food court
 66 Vending machines
 25 Caterer
 77 Other (please specify)
- _____

17. Who provides the food service available for students in this school? (Check all that apply.)

- 117 School food service staff
 44 Food service management company staff
 32 Specialty contractor
 35 Other (please specify)
- _____

18. What meal pattern guidelines, if any, does this school follow? (Check all that apply.)

- 94 The meals do not follow any recognized nutritional or meal pattern guidelines
 76 National School Lunch Program meal patterns
 47 State guidelines
 47 Other (Please explain)
- _____
- _____

The Rehabilitation Act of 1973 forbids discrimination on the basis of disability in federally funded programs. NSLP regulations require schools which provide food services to serve special meals, at no extra charge, to students whose disability restricts their diet. NSLP regulations also permit schools to make meal substitutions for non-disabled children who are not able to consume the regular lunch because of medical or other special dietary needs.

19. Since this school left the NSLP, have modified meals been available for students with physical disabilities? (Check one.)

- 117 Yes
 92 No ———> please explain why in the space provided below.
- _____
- _____
- _____

Appendix I
Questionnaire and Schools' Responses

20. Since this school left the NSLP, have modified meals been available for students who, though not disabled, have special dietary needs? (Check one.)

132 Yes

76 No → please explain why in the space provided below.

21. If you answered "yes" to either question #19 or #20, please explain: 1) what types of modified meals are offered to these students with physical disabilities and special dietary needs, 2) who prepares the meals, and 3) how the meals are provided to the students.

SECTION IV: FREE & REDUCED-PRICE LUNCH SERVICES

22. Which of the following best describes the measures by which students who received *free lunches* under the NSLP currently receive lunches? (Check all that apply.)

116 School provides free lunches

20 School provides financial assistance so students can buy lunches

17 Students earn lunches by working at school

52 Students are responsible for their own lunches

19 Food service contractor provides free lunches at no cost to school

3 Students go to a nearby NSLP school for free lunches

0 Students go to a nearby non-NSLP school for free lunches

20 Other (Please explain)

23. Which of the following best describes the measures by which students who received *reduced-price lunches* under the NSLP currently receive lunches? (Check all that apply.)

50 School provides free lunches

51 School provides reduced-price lunches

9 School provides financial assistance so students can buy lunches

17 Students earn lunches by working at school

74 Students are responsible for their own lunches

16 Food service contractor provides free or reduced-price lunches at no cost to school

3 Students go to a nearby NSLP school for reduced-price lunches

0 Students go to a nearby non-NSLP school for reduced-price lunches

40 Other (please explain)

**Appendix I
Questionnaire and Schools' Responses**

24. Does this school have a written policy designed to avoid overtly identifying students who receive free and/or reduced-price lunches? (*Check one.*)

73 Yes ———→ If available, please attach a copy of this policy to the back of this questionnaire. Or, briefly explain the policy in the space provided below.

132 No ———→ please explain what measures are taken to ensure that students who receive free and/or reduced-price lunches are not identified by other students.

25. In the following table, indicate what benefits the school food authority and/or school expected to achieve when it discontinued the NSLP in this school. For each anticipated benefit, indicate whether this benefit was actually achieved. Indicate your responses by placing check marks in the corresponding boxes.

Potential Benefits From Withdrawing From NSLP	Expected Benefit?			Was The Benefit Achieved?			
	Yes (1)	No (2)	Missing (3)	Yes (4)	No (5)	Don't Know (6)	Missing (7)
1. Reduce lunch program administrative requirements	149	84	69	153	5	12	132
2. Reduce lunch program financial losses	192	52	58	183	17	5	97
3. Increase revenues from a la carte food sales	129	99	74	122	27	28	125
4. Satisfy student requests for less restrictive food sales rules	142	88	72	146	18	21	117
5. Use lunch program profits for school purposes beyond those permitted under NSLP	32	174	96	41	43	18	200
6. Other (Please specify)	39	3	260	34	4	3	261
7. (Please specify)	10	3	289	10	0	2	290

Appendix I
Questionnaire and Schools' Responses

26. After leaving the NSLP, did this school return to the NSLP? (Check one.)

22 Yes →when? _____
273 No

27. Do you anticipate this school returning to the NSLP? (Check one.)

11 Yes →when? _____
169 No
87 Don't Know

SECTION V: SCHOOL BREAKFAST PROGRAM

28. Was this school participating in the school breakfast program (SBP) when it withdrew from the NSLP? (Check one.)

53 Yes
231 No →skip to Section VI "Concluding Information".

29. Did this school stop offering the SBP when it withdrew from the NSLP? (Check one.)

31 Yes
22 No

30. Did this school end SBP participation for the same reasons it withdrew from the NSLP? (Check one.)

42 Yes
3 No (Please explain)

31. Are you currently offering breakfast in this school? (Check one.)

47 Yes
6 No

32. We have asked you to answer a specific set of questions for this individual school that withdrew from the NSLP. However, if you have any additional comments or information you would like to provide us about the school lunch program in this school, please do so in the space below.

Before completing the name and address section of this questionnaire, please review your responses to make sure that all appropriate questions have been answered. Thank you.

SECTION VI: CONCLUDING INFORMATION

Reminder! Sections I through V should be completed on a school-by-school basis. If you have additional schools that withdrew from the program, please complete the additional forms provided with this questionnaire.

Please provide the following information about the person(s) who completed this questionnaire. This information will assist us if clarification of answers is necessary.

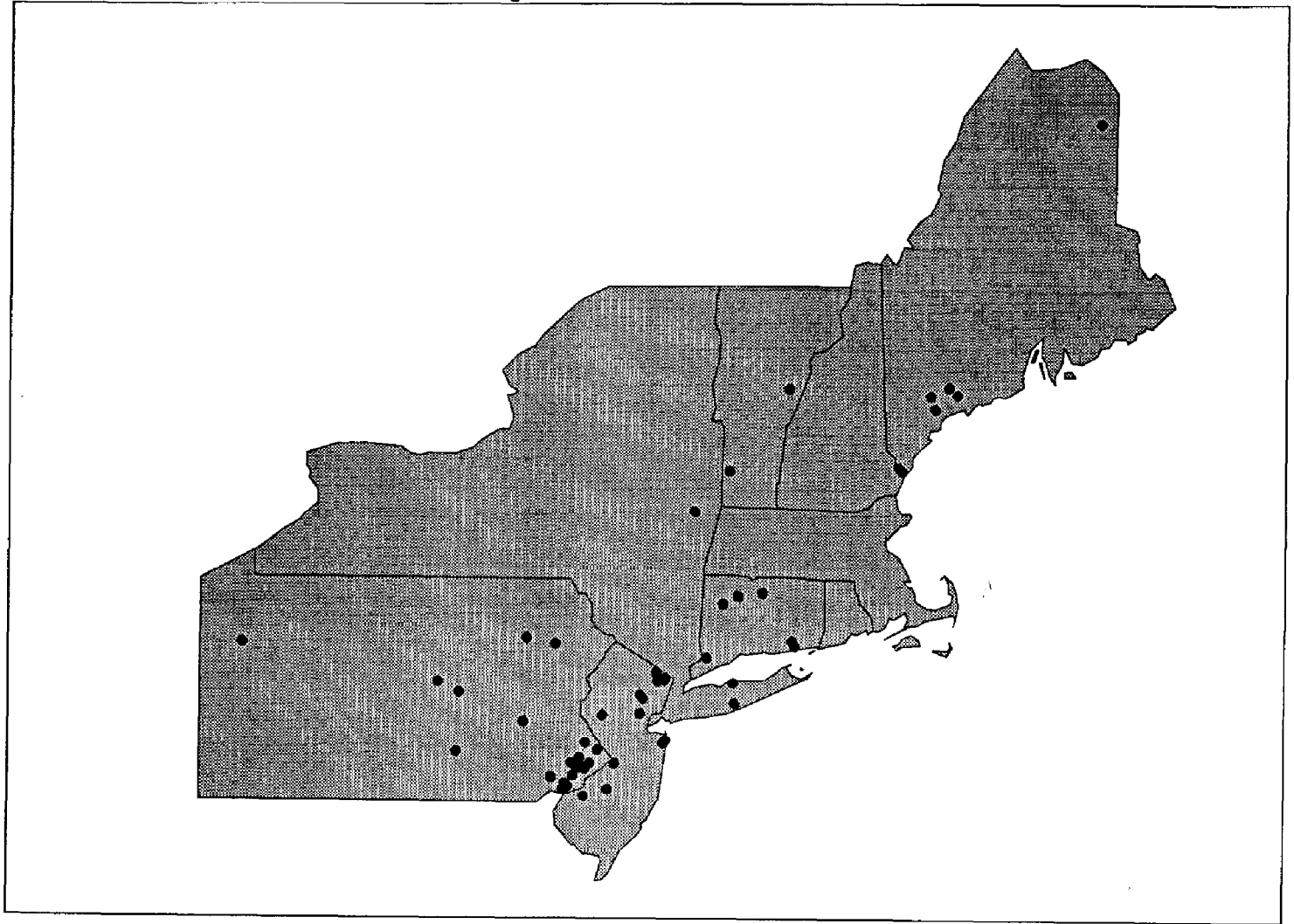
Name/Title/Address & Telephone:

Thank you for your cooperation and assistance! This concludes the questionnaire.

Locations of Dropout Schools, by Region

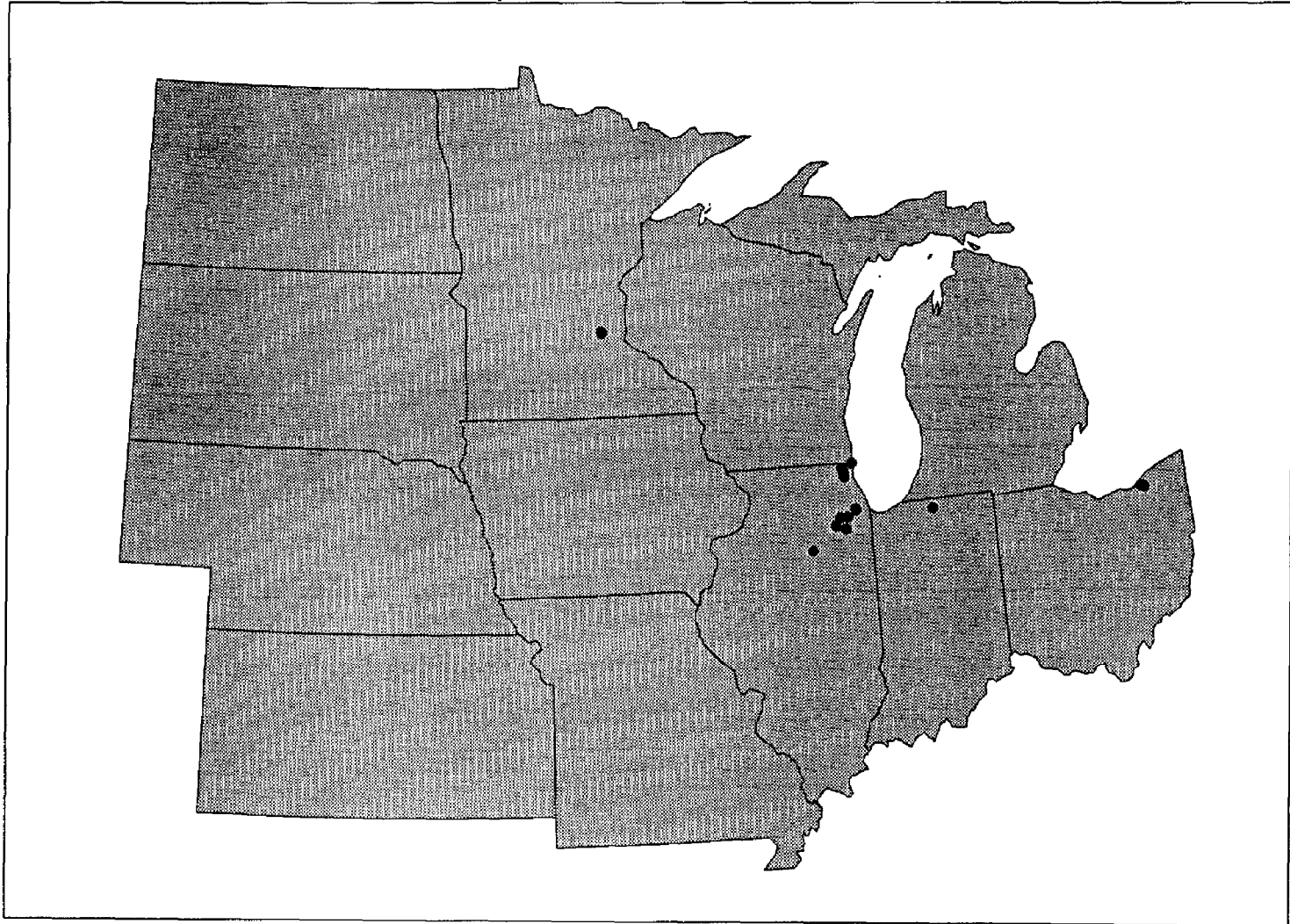
The regions are established by the U. S. Department of Education.

Figure II.1: Public Schools in the Northeastern Region



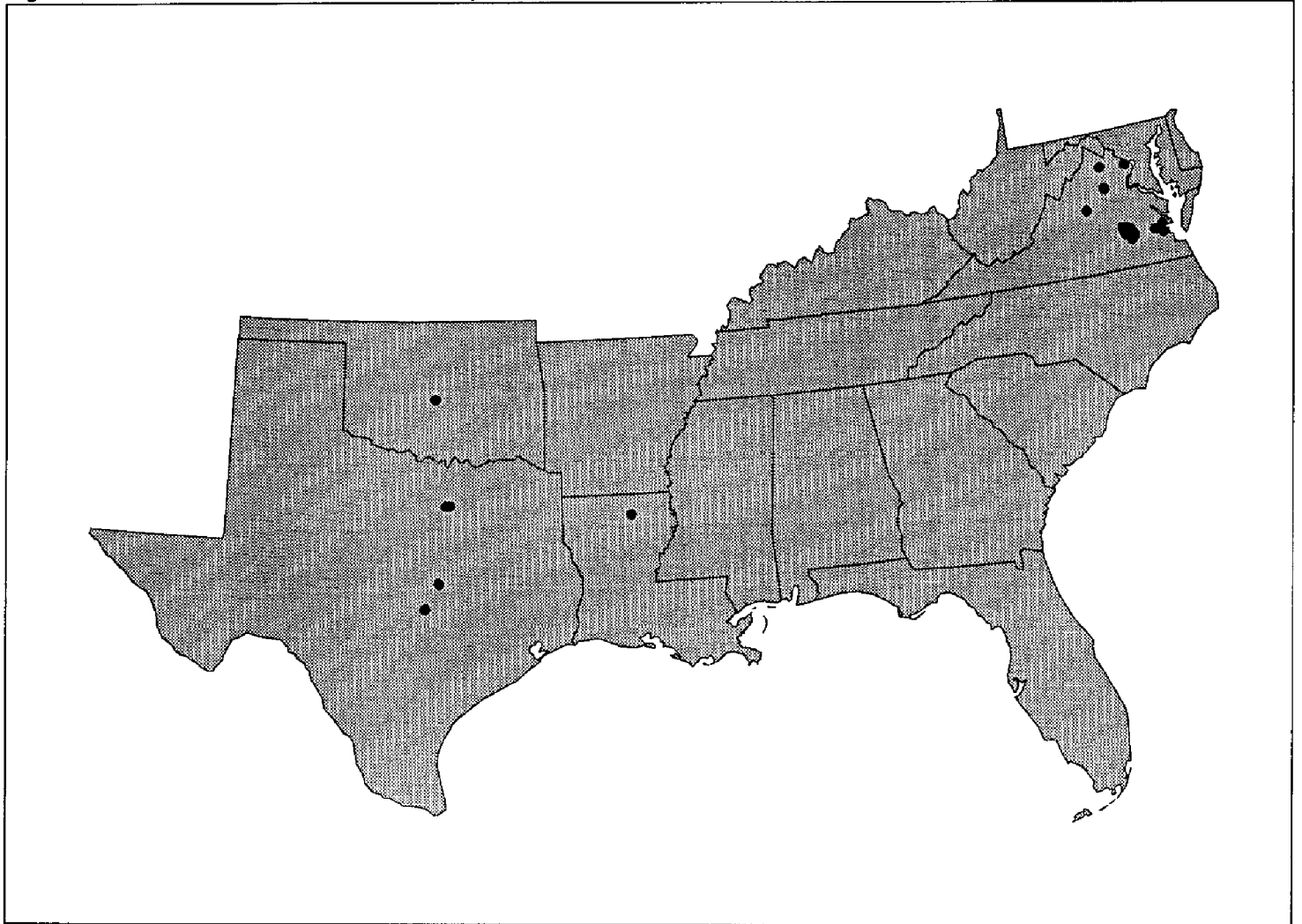
Appendix II
Locations of Dropout Schools, by Region

Figure II.2: Public Schools in the Midwestern Region



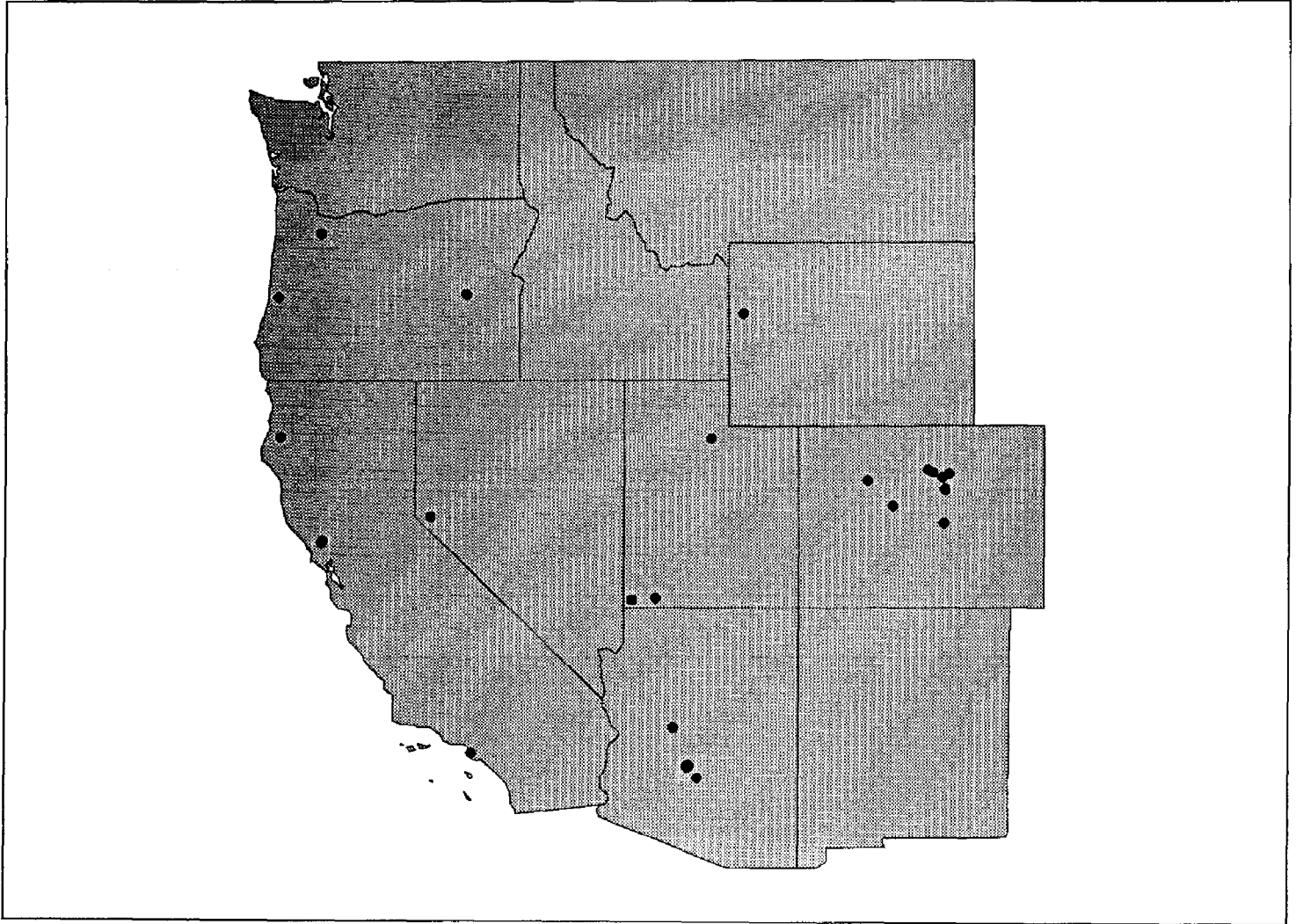
Appendix II
Locations of Dropout Schools, by Region

Figure II.3: Public Schools in the Southern Region



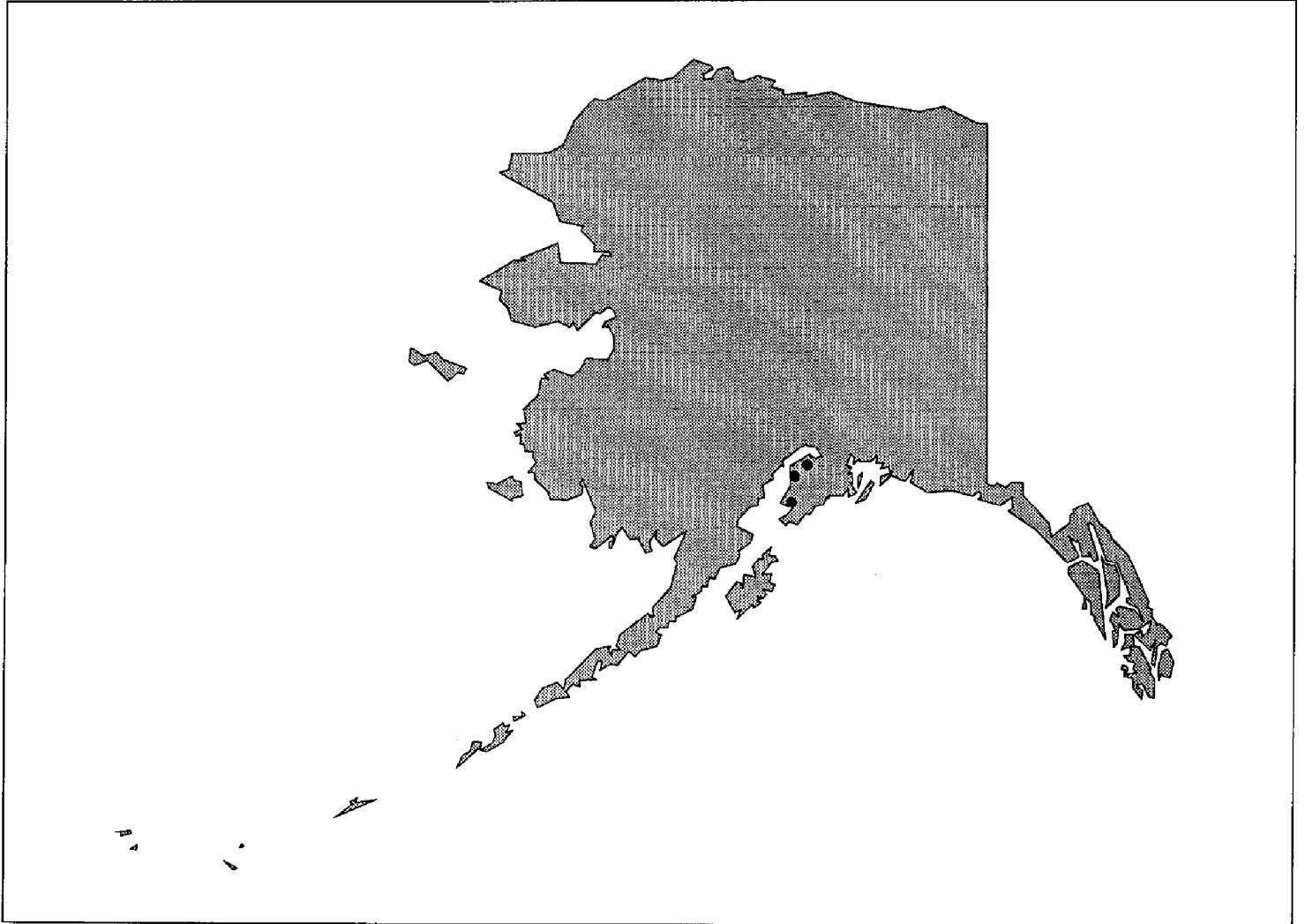
Appendix II
Locations of Dropout Schools, by Region

Figure II.4: Public Schools in the Western Region (Mainland)



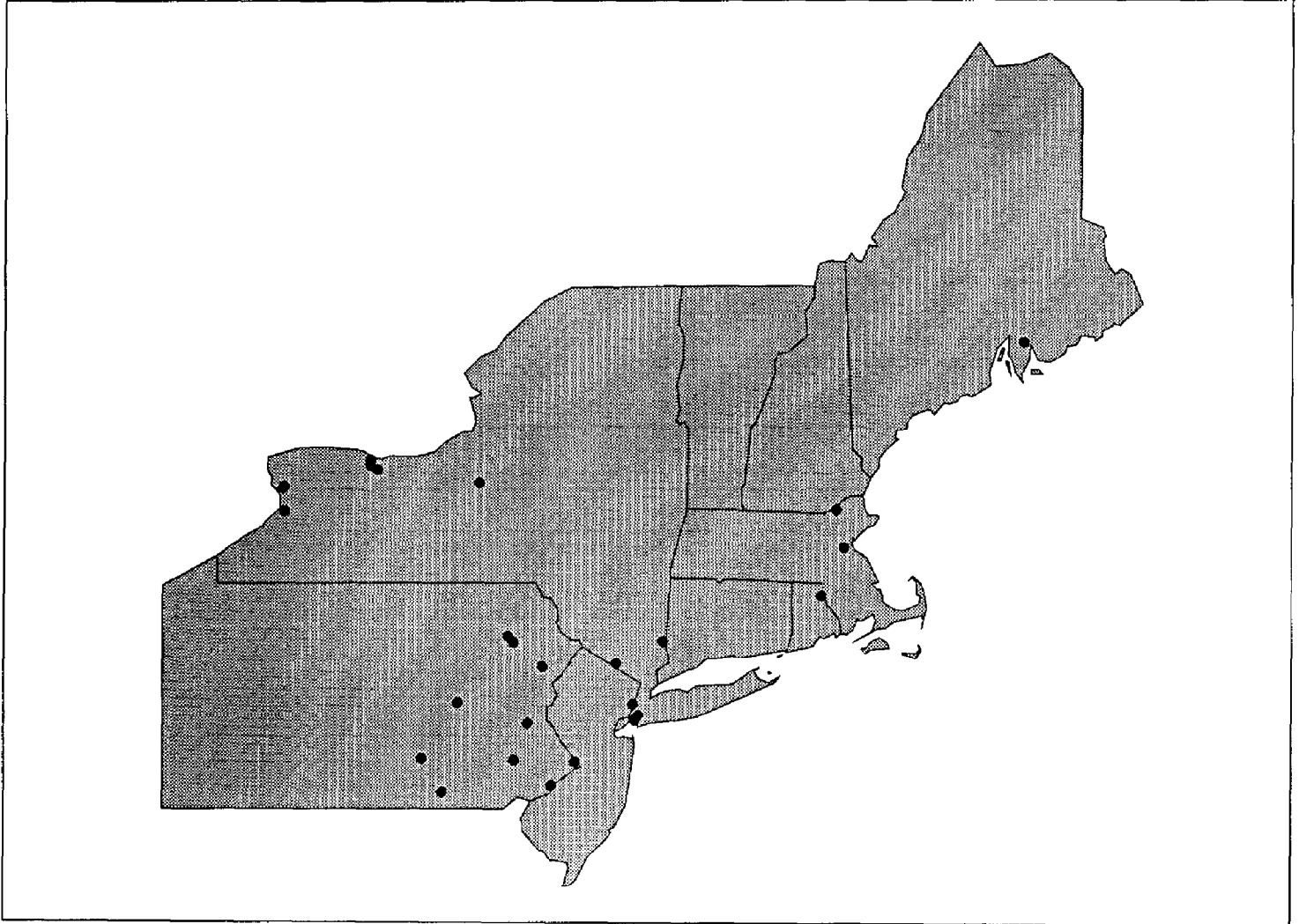
Appendix II
Locations of Dropout Schools, by Region

Figure II.5: Public Schools in the Western Region (Alaska)



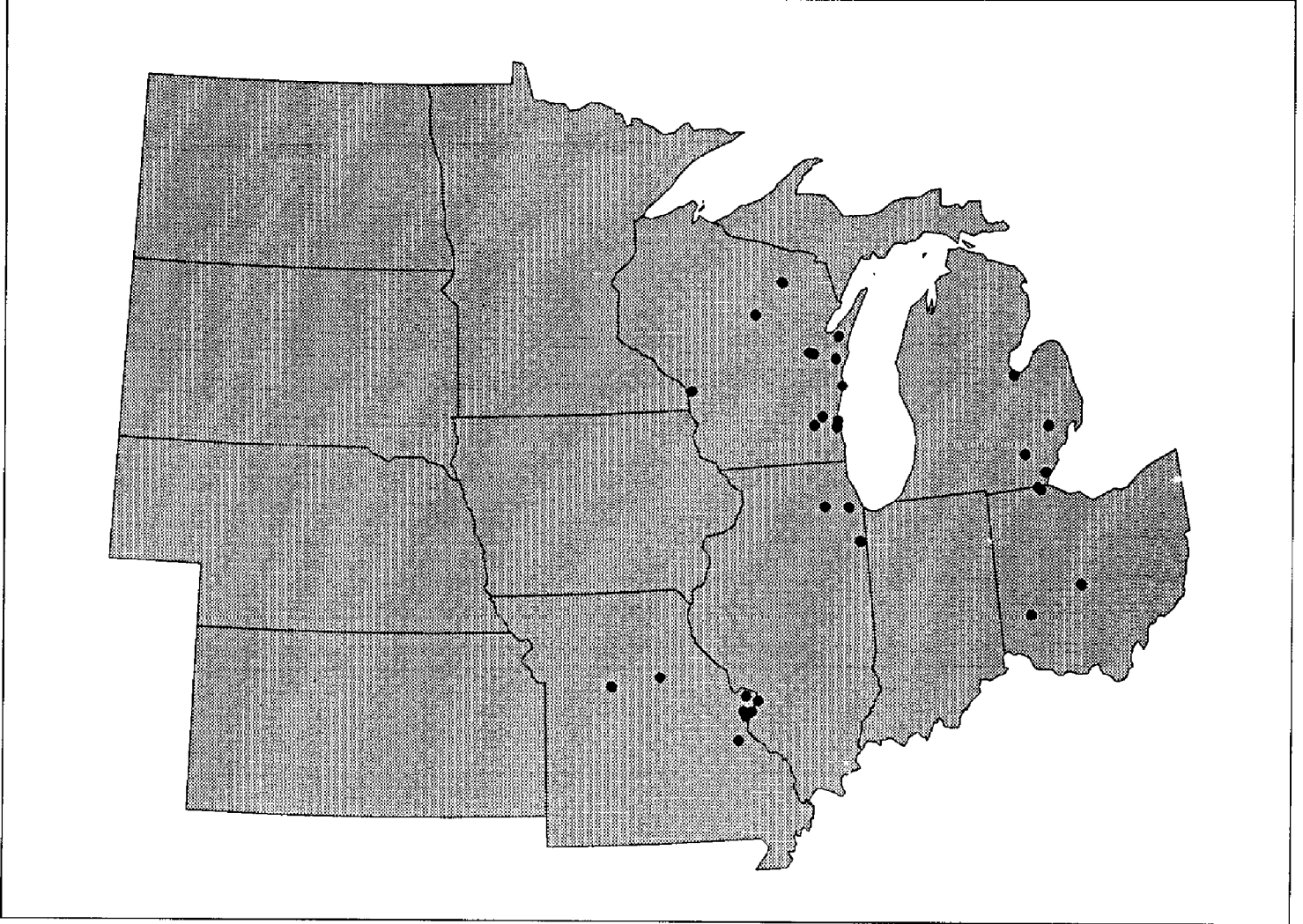
Appendix II
Locations of Dropout Schools, by Region

Figure II.6: Private Schools in the Northeastern Region



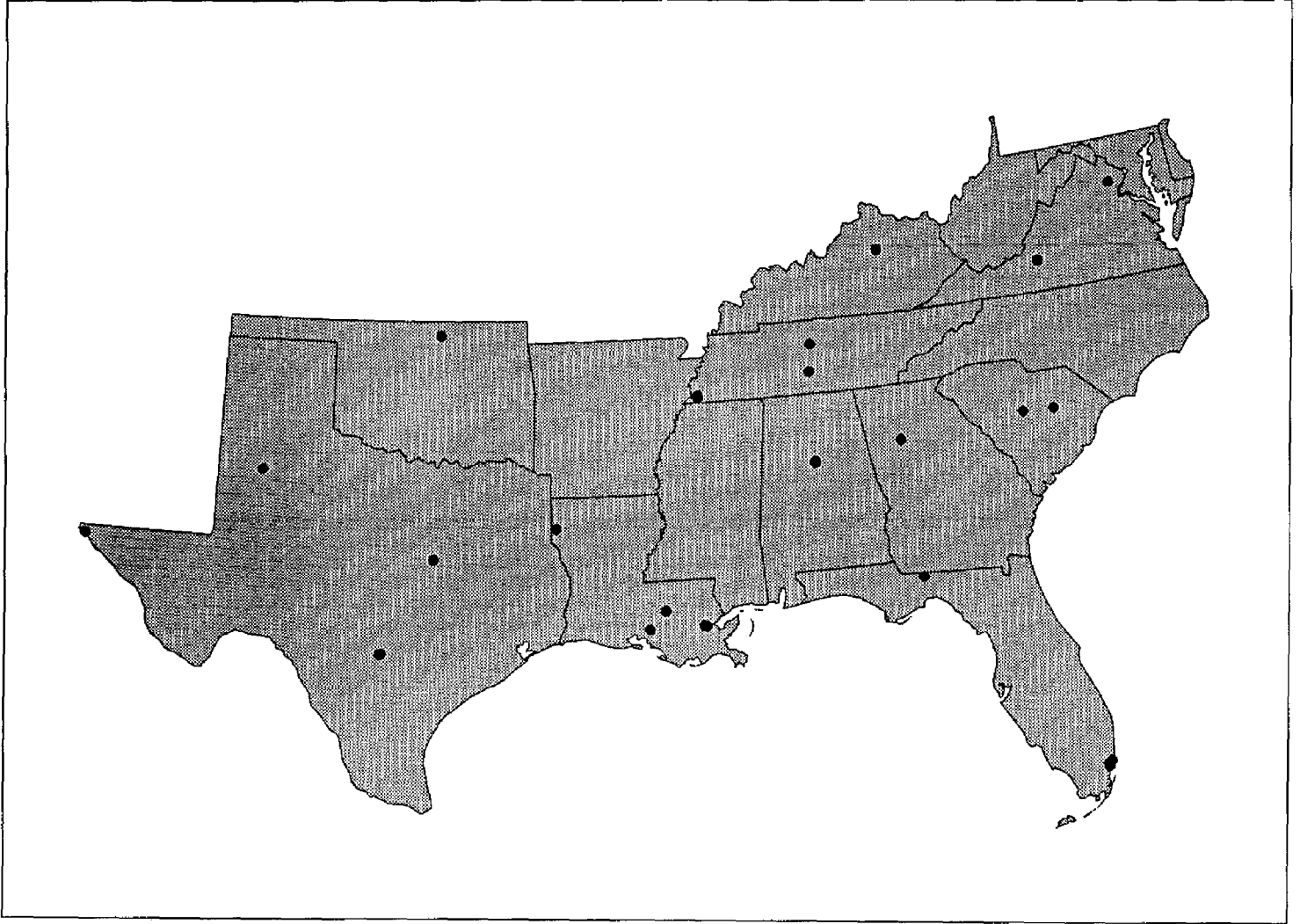
Appendix II
Locations of Dropout Schools, by Region

Figure II.7: Private Schools in the Midwestern Region



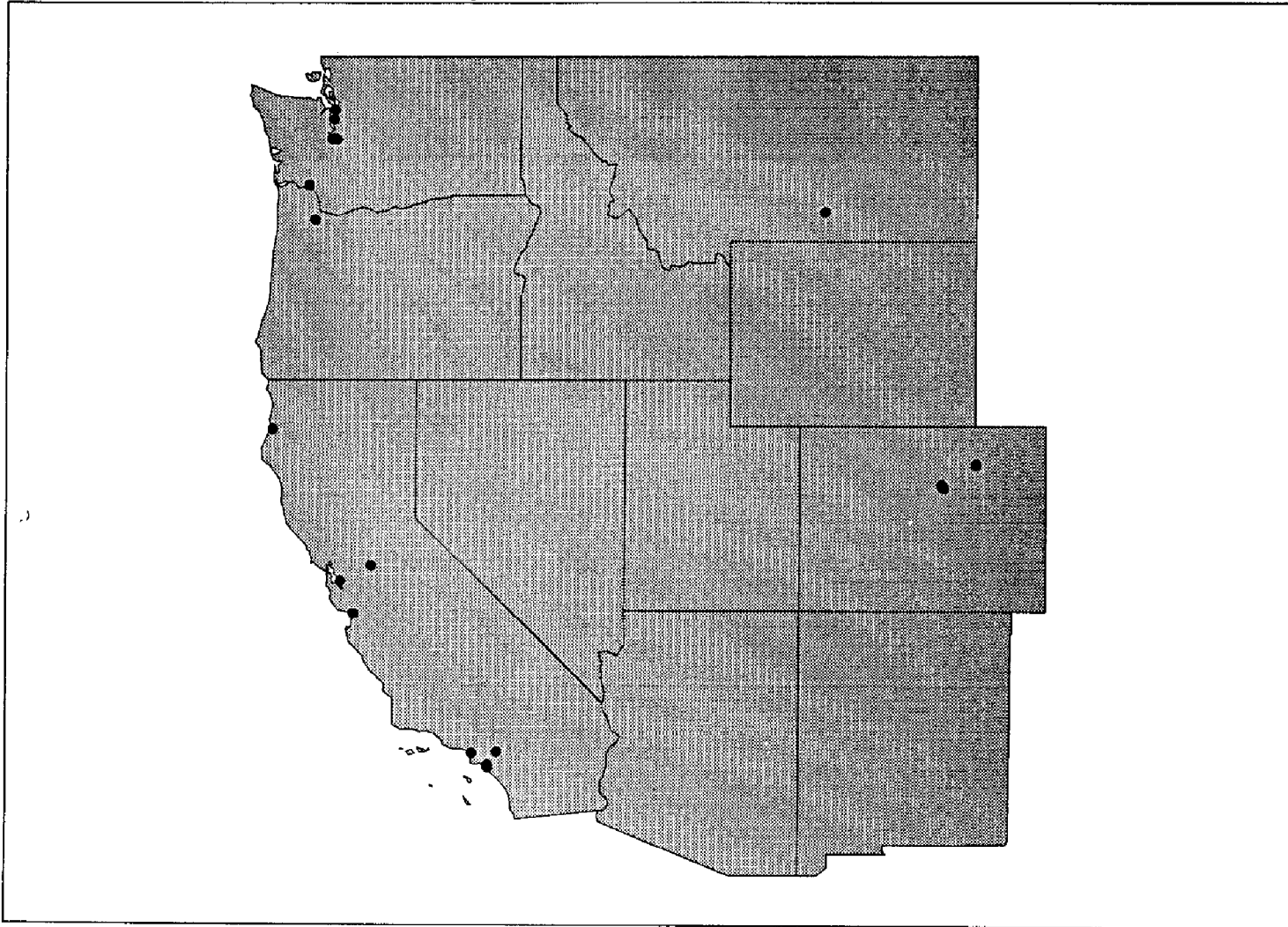
Appendix II
Locations of Dropout Schools, by Region

Figure II.8: Private Schools in the Southern Region



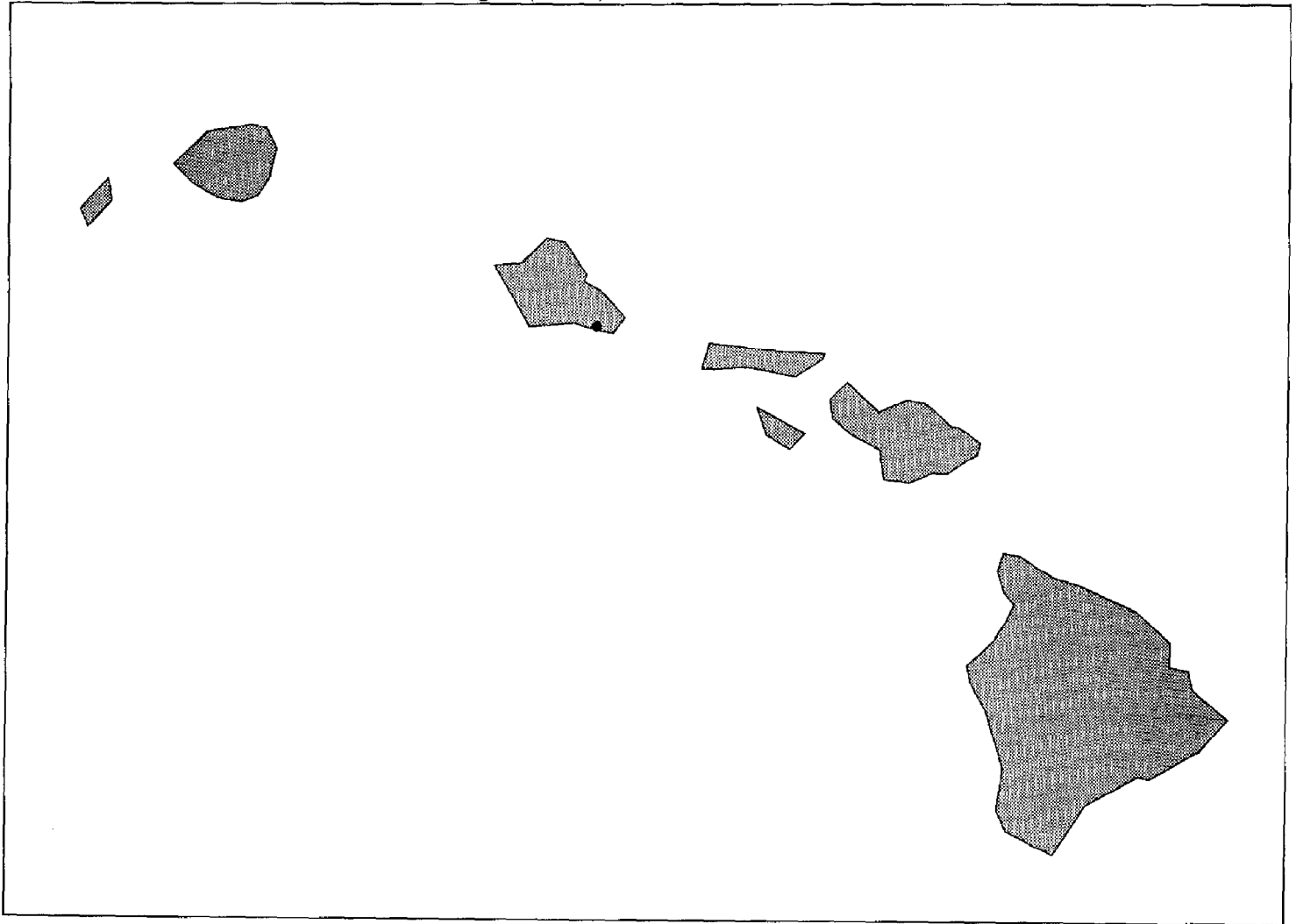
Appendix II
Locations of Dropout Schools, by Region

Figure II.9: Private Schools in the Western Region (Mainland)



Appendix II
Locations of Dropout Schools, by Region

Figure II.10: Private Schools in the Western Region (Hawaii)



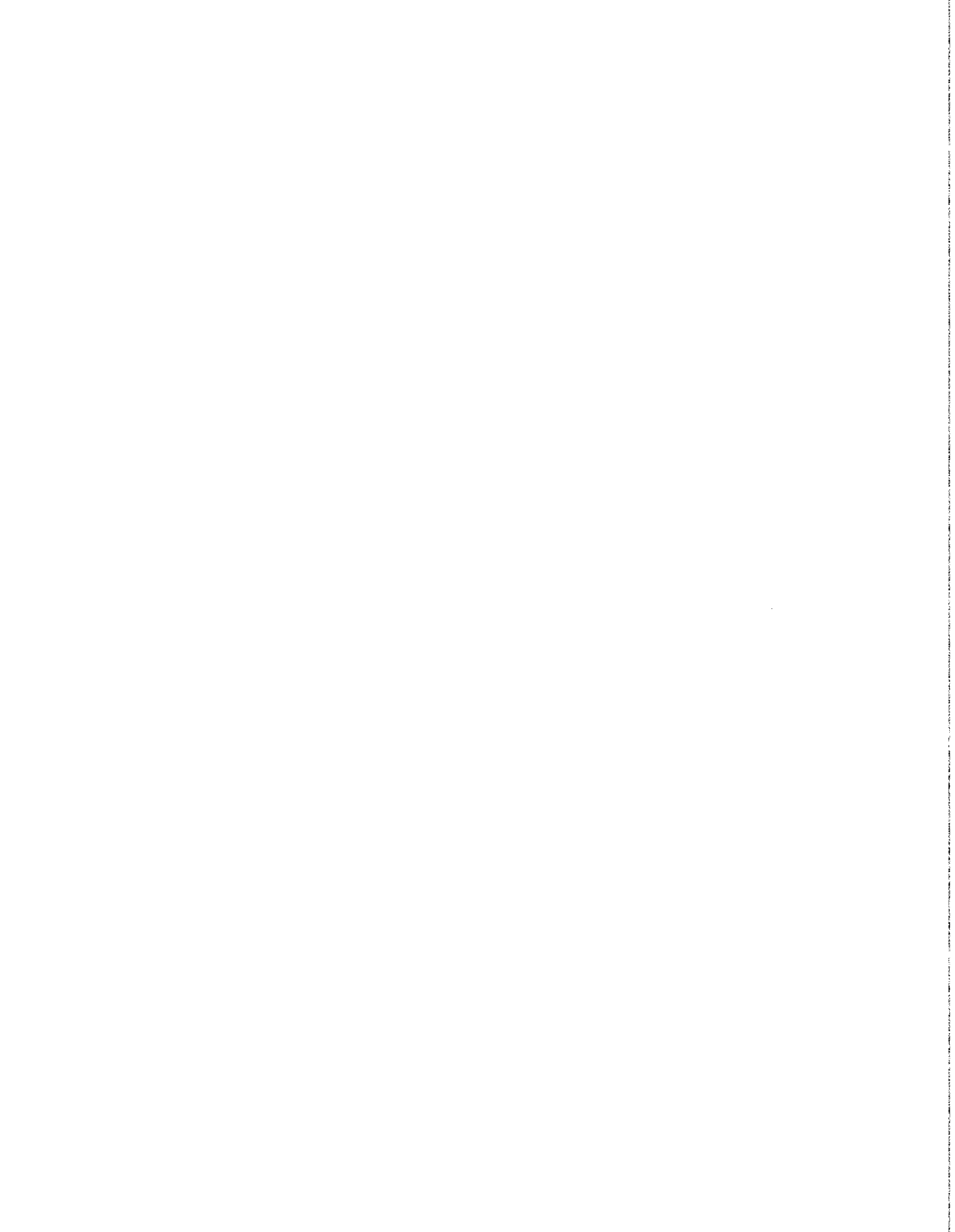
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