



SCHOOL MEAL PROGRAMS

Additional Data and Outreach Could Help Charter School Participation

Report to Congressional Requesters

November 2024
GAO-25-106846
United States Government Accountability Office

Accessible Version

GAO Highlights

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Highlights of [GAO-25-106846](#), a report to congressional requesters

November 2024

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Why GAO Did This Study

The school meal programs provide nutritious meals to millions of students each day. In fiscal year 2023, federal spending for these programs was \$21 billion. It is unclear how many charter schools participate in these programs or what factors can affect their participation.

GAO was asked to review charter school participation in school meal programs. This report examines (1) available data on charter school participation in the National School Lunch Program over the past 5 years and factors affecting participation, (2) challenges that charter schools in selected states faced in school meal program participation, and (3) assistance from selected states and FNS that could help address identified challenges. GAO analyzed Education data on charter school participation in the National School Lunch Program for school years 2018-19 and 2022-23. GAO reviewed information from four states and 16 charter schools selected for geographic diversity, program participation, and other criteria; and interviewed state and school officials, visiting schools in two states. GAO also reviewed relevant federal laws and regulations, FNS documents, and interviewed FNS officials.

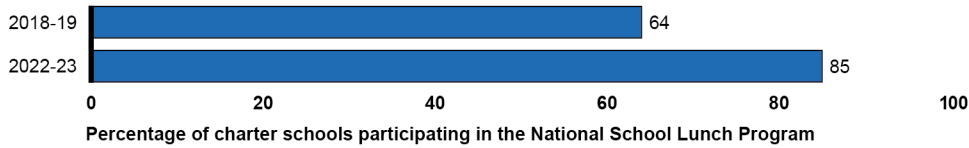
What GAO Recommends

GAO is making two recommendations to USDA to assess whether there are cost-effective ways to study factors that affect charter school participation in school meal programs and to conduct additional outreach to charter schools on school meals that could help address identified challenges. USDA concurred with both recommendations.

What GAO Found

Eighty-five percent of charter schools nationwide participated in the National School Lunch Program in school year 2022-23, increasing from 64 percent in school year 2018-19, according to Department of Education data. Charter school participation rates varied by states. For instance, 13 states and Puerto Rico had 100 percent participation in school year 2022-23 and five states had less than 50 percent participation. In 2018, the Food and Nutrition Service (FNS) in the U.S. Department of Agriculture (USDA) collected information for its annual child nutrition operations study to better understand charter school participation in the National School Lunch and School Breakfast Programs (school meal programs) that could inform potential reasons for state variation. However, due to study challenges, FNS was not able to use the information and has not tried to explore these issues since. FNS officials said that it would be resource intensive to include enough charter schools in a study to obtain statistically valid findings, but the agency has not recently assessed the feasibility or cost of doing so. Collecting information on charter schools in cost effective ways, such as by leveraging prior efforts, could help FNS better support states and schools.

Charter School Participation Rates in the National School Lunch Program, School Years 2018-19 and 2022-23



Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Accessible Data for Charter School Participation Rates in the National School Lunch Program, School Years 2018-19 and 2022-23

Percentage of charter schools participating in the National School Lunch Program

Year	Percentage
2018-19	64
2022-23	85

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Officials from the 14 charter schools in GAO's review that participate in the National School Lunch Program reported facility, vendor, and staffing challenges in operating school meal programs. For example, most school officials said that limited kitchen or eating space makes it difficult to prepare or serve food, as a number operated in non-traditional spaces. Many of those schools contracted with vendors for prepared meals, but also reported challenges with using vendors, such as canceled contracts.

Selected states—which oversee local school meal program operations—and FNS provided assistance that could help charter schools address challenges. Examples of assistance from states included training, funds for facility improvements, and informational resources. Similarly, FNS has provided assistance, such as program guidance in 2018 specifically on charter schools. However, school officials GAO interviewed said they were unaware of some existing resources and would benefit from additional outreach. Specifically, 12 of 14 schools that participated in school meal programs did not know of FNS's 2018 guidance for charter schools, which links to resources and answers questions pertinent to charter schools, although it is available on FNS's website. As more charter schools are participating in school meal programs, taking steps to ensure they receive relevant information through additional outreach could help them address challenges and promote greater access to school meals.

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Abbreviations

- CCD: Common Core of Data
- CMO: charter management organization
- FNS: Food and Nutrition Service
- National School Lunch Act: Richard B. Russell National School Lunch Act, as amended
- NSLP: National School Lunch Program
- SBP: School Breakfast Program
- SFA: school food authority
- USDA: U.S. Department of Agriculture



November 12, 2024

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
House of Representatives

The Honorable Russ Fulcher
House of Representatives

The U.S. Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) administers the National School Lunch Program (NSLP) and the School Breakfast Program (SBP), which are the nation’s largest child nutrition programs and are intended to provide students with nutritious meals each school day.¹ In fiscal year 2023, NSLP and SBP provided meals to 29 million and 15 million students, respectively, according to FNS data. Spending that year totaled \$16 billion for NSLP and \$5 billion for SBP.

Like traditional public schools, charter schools—which are governed by a contract (or charter) and authorized under state law—can participate in these programs and receive federal reimbursement for meals served. In school year 2022-23, over 3.3 million students nationwide were enrolled in over 7,600 non-virtual charter schools, according to Department of Education data.² However, it is unclear how many of these schools participate in school meal programs or what factors affect their participation.

You asked us to review charter school participation in school meal programs. This report examines (1) what available data show regarding charter schools’ participation in NSLP from school years 2018-19 through 2022-23 and factors affecting participation, (2) challenges that charter schools in selected states faced in participating in school meal programs, and (3) assistance that selected states and FNS have provided that could help address challenges charter schools face.

To examine what available data show about charter schools’ participation in NSLP, we analyzed data from Education’s Common Core of Data (CCD) for school years 2018-19 and 2022-23 (the most recent data available at the time of our review).³ Our analysis included NSLP participation rates for charter and traditional schools and characteristics of participating and non-participating charter schools, such as student demographics, school location, and the use of special eligibility provisions to participate in NSLP. We examined this information at the national and state level.⁴ However, we were not able to examine charter

¹For the purposes of this report, we refer to these two programs collectively as school meal programs.

²For this report, we focused on charter schools where most of the instruction is conducted in person, and excluded schools that were primarily or entirely virtual. Virtual charter schools are public charter schools that operate entirely or mostly online. Schools must be in a building to participate in the National School Lunch Program or School Breakfast Program.

³CCD is an annual survey administered by Education’s National Center for Education Statistics to collect data from state educational agencies on all public schools in the U.S. and associated territories.

⁴The data included all 50 states, the District of Columbia, and U.S. territories. See appendix I for additional data by state. For the purposes of this report, we refer to the District of Columbia as a state, unless noted otherwise. Not all states or territories have charter schools, which are reflected in the data and described in more detail later in the report. Traditional schools include magnet schools.

schools' participation in the School Breakfast Program as CCD does not collect this information, and we did not identify other national data sources describing charter school participation in this program.

We assessed the reliability of these data by (1) reviewing related documentation such as information state agencies provided to Education about data anomalies and data that were not reported for each year studied, (2) performing manual testing on the data, and (3) obtaining responses to data questions from knowledgeable agency officials. We did not analyze data from school years 2019-20 through 2021-22 due to high percentages of missing data on NSLP participation. We determined the data for school years 2018-19 and 2022-23 were sufficiently reliable for the purpose of describing the total number of traditional and charter schools, participation in NSLP, the use of special eligibility provisions, and characteristics of students and schools.

To describe potential factors affecting participation, we reviewed FNS annual child nutrition operations studies and spoke with officials from FNS and selected states and schools described in more detail below. For the child nutrition operations studies, we reviewed published studies for school years 2015-16 through 2017-18, which surveyed state agencies on school meal program participation in their states, including charter schools. For school year 2018-19, we reviewed relevant survey questions to state agencies and preliminary results, as FNS did not publish that year's study. In addition, we examined FNS' Research and Evaluation Plan for fiscal year 2024 to identify whether FNS planned to examine charter schools in future research studies.

To describe challenges charter schools faced in participating in school meal programs, we interviewed officials and reviewed information from schools and state agencies in four states (California, Florida, New Mexico, and Ohio). These selected states had 20 or more charter schools and at least 20,000 charter school students, at least one charter school participating in NSLP, and at least one not participating.⁵ The states also provided geographic diversity and had policies on the provision of school meals that applied to charter schools. For each state, we selected schools from a randomly sorted list of charter schools to represent a range of school location and NSLP participation. In total we interviewed officials from 16 charter schools: 14 that participated in NSLP (including one on tribal land) and two that did not participate.⁶ (See appendix II for profiles of each state.) We discussed the benefits and challenges schools faced with respect to school meal programs and any strategies used to address those challenges. We also reviewed related documents and information, including charter school participation in the School Breakfast Program in school year 2023-24. We conducted a mix of virtual and in-person interviews with state and charter school officials in the four selected states. We toured some schools and conducted some interviews in person in California and New Mexico. Because we used a non-generalizable sample, our findings cannot be used to describe the experiences of all charter schools or all states but are used to provide illustrative examples.

To describe relevant assistance from selected states and FNS, we spoke with state and FNS officials and reviewed related documents and other information. Specifically, we spoke with officials who oversee school meal programs in the four selected states about assistance to schools (such as guidance, training, or grants) and whether any assistance was specifically for charter schools. We discussed similar topics in interviews with officials from FNS's national office and the four regional offices associated with the four selected states. We also spoke with officials at the 14 selected charter schools that participate in school meal programs about the assistance they received from state agencies and FNS. Additionally, we reviewed relevant federal laws and

⁵To select states and charter schools, we used school year 2021-22 CCD data, which were the most recent data available at the time of our selection.

⁶The charter school on tribal land was not affiliated with the Tribal government.

regulations, policies, and guidance documents, such as a 2018 FNS memorandum with information for charter schools on school meal programs. We reviewed relevant laws of selected states, which we identified through Education’s National Charter School Resource Center, the National Alliance for Public Charter Schools, and interviews with state officials. We also reviewed state agency documentation, such as guidance for state funding and training resources on school meal program operations.

We assessed FNS’s efforts to understand school meal operations and provide assistance using USDA’s Strategic Plan and FNS’s Equity Action Plan.⁷ We also reviewed relevant provisions of the Richard B. Russell National School Lunch Act, as amended, (National School Lunch Act).⁸

Additionally, to inform our work on all three questions, we interviewed representatives from national stakeholder groups. Specifically, we interviewed representatives from the Food Research and Action Center, National Association of Charter School Authorizers, the National Alliance for Public Charter Schools, and the School Nutrition Association.

We conducted this performance audit from May 2023 to November 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Administration of School Meal Programs

Community Eligibility Provision

This provision is authorized under the Healthy, Hunger-Free Kids Act of 2010 and:

- **Provides** reimbursement for schools, groups of schools, or school districts in high-poverty areas to offer no-cost meals to all enrolled students for up to 4 years;
- **Requires** that schools, groups of schools, or school districts participating in the Community Eligibility Provision have an identified student percentage of 25 percent or higher, which refers to students approved for free meals based on the family’s participation in certain federal means-tested programs or the student’s status as homeless, in foster care, or other specified groups;
- **Requires** that schools participate in both the National School Lunch Program and the School Breakfast Program;
- **Uses a formula** to determine the percent of meals that will be reimbursed at the free rate and the full-price rate;
- **Requires** school(s) to verify the percent of enrolled students who automatically qualify for free meals every 4 years;
- **Reduces paperwork** for school staff because they do not need to collect or verify household applications each year.

Source: USDA Food and Nutrition Service documents. | GAO-25-106846

⁷U.S. Department of Agriculture, *Strategic Plan: Fiscal Years 2022-2026* (Mar. 2022); Food and Nutrition Service, *Food, Nutrition, and Consumer Services: Equity Action Plan* (July 2023).

⁸Pub. L. No. 79-396, 60 Stat. 230 (1946) (codified as amended at 42 U.S.C. §§ 1751-1769j).

FNS, states, and school food authorities (SFA) are responsible for administering and operating school meal programs, which are intended to promote the health and well-being of students through nutritious food.

FNS develops guidance, provides training and technical assistance to state agencies, and oversees states' administration of the programs. A state—typically the state's department of education—distributes per-meal reimbursement funds to participating SFAs, provides training and technical assistance, oversees SFA compliance with program requirements, and facilitates communication between FNS and SFAs.

An SFA—which typically corresponds to a school district—operates school meal programs locally under an agreement with its state agency and is responsible for meeting program requirements. For example, to receive federal reimbursement funds, an SFA must ensure that each meal served meets meal pattern requirements (required minimum amounts of foods, such as milk, grains, and fruit per meal) and must count the number of reimbursable meals served each day. In addition, SFAs may be responsible for determining and verifying student eligibility for free or reduced-price lunch each year.⁹ A student's eligibility is determined by having families submit an application with income information or through a process known as direct certification that eliminates the need for applications.¹⁰

SFAs participating in school meal programs can use one of four special eligibility provisions, which are intended to reduce paperwork for schools and families. These provisions—known as Provision 1, 2, and 3 and the Community Eligibility Provision (see side bar)—streamline administration by allowing students in participating schools to be certified or schools to receive a consistent reimbursement amount, for multiple years when certain requirements are met. For example, using Provision 2 allows schools to determine student eligibility once every 4 years instead of yearly using household applications. The Community Eligibility Provision, which was introduced after the other provisions, is now the most commonly used.

Charter School Trends

What are charter schools?

Charter schools are publicly funded schools granted increased flexibility in school management in exchange for committing to obtain specific educational objectives, such as improved student outcomes. A charter school:

- Operates under state law and adheres to many of the same regulations as other public schools;
- Is authorized by a school district, state agency, or other entity that also provides oversight;
- Must renew its charter periodically through its authorizer;
- May either be independent or part of a charter management organization, which is a nonprofit organization that operates or manages a network of schools linked by centralized support, operations, and oversight;
- Serves students in pre-kindergarten through grade 12, and can offer specialized curricula, such as science and technology or performing arts.

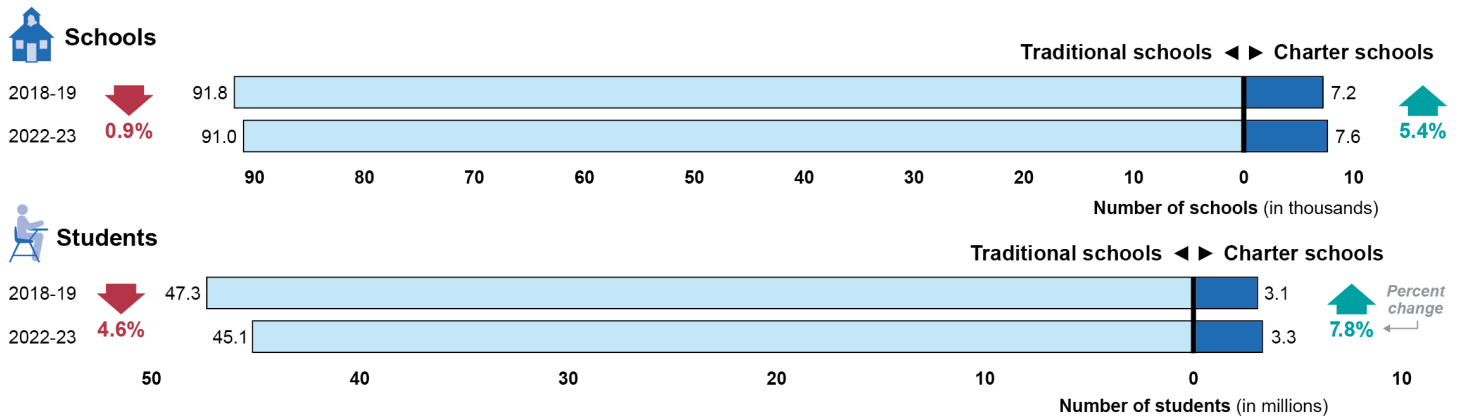
Sources: National Charter School Resource Center, National Association of Charter School Authorizers documents, GAO and Congressional Research Service reports, selected charter school interviews. | GAO-25-106846

⁹While federal regulations note that local educational agencies are responsible for determining and verifying student eligibility, FNS guidance notes that SFAs may assume these responsibilities because of variations at the local level.

¹⁰Direct certification is based on families' participation in certain other federal means-tested programs, such as the Supplemental Nutrition Assistance Program.

Charter schools make up a relatively small, but growing portion of all schools nationwide. According to CCD data, between school years 2018-19 and 2022-23, the number of charter schools and their enrolled students increased. In contrast, both the number of traditional schools and their enrolled students decreased over the same period (see fig. 1).

Figure 1: Number of Schools and Students, Traditional and Charter, School Years 2018-19 and 2022-23



Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Accessible Data for Figure 1: Number of Schools and Students, Traditional and Charter, School Years 2018-19 and 2022-23

Schools

Year	Number of Traditional schools	Traditional schools change from 2018-19 to 2022-23	Number of charter schools	Charter schools change from 2018-19 to 2022-23
2018-19	91844	Down 0.9%	7218	Up 5.4%
2022-23	91012	Down 0.9%	7609	Up 5.4%

Students

Year	Number at Traditional schools	Traditional schools change from 2018-19 to 2022-23	Number at charter schools	Charter schools change from 2018-19 to 2022-23
2018-19	47.34 million	Down 4.6%	3.07 million	Up 7.8%
2022-23	45.14 million	Down 4.6%	3.31 million	Up 7.8%

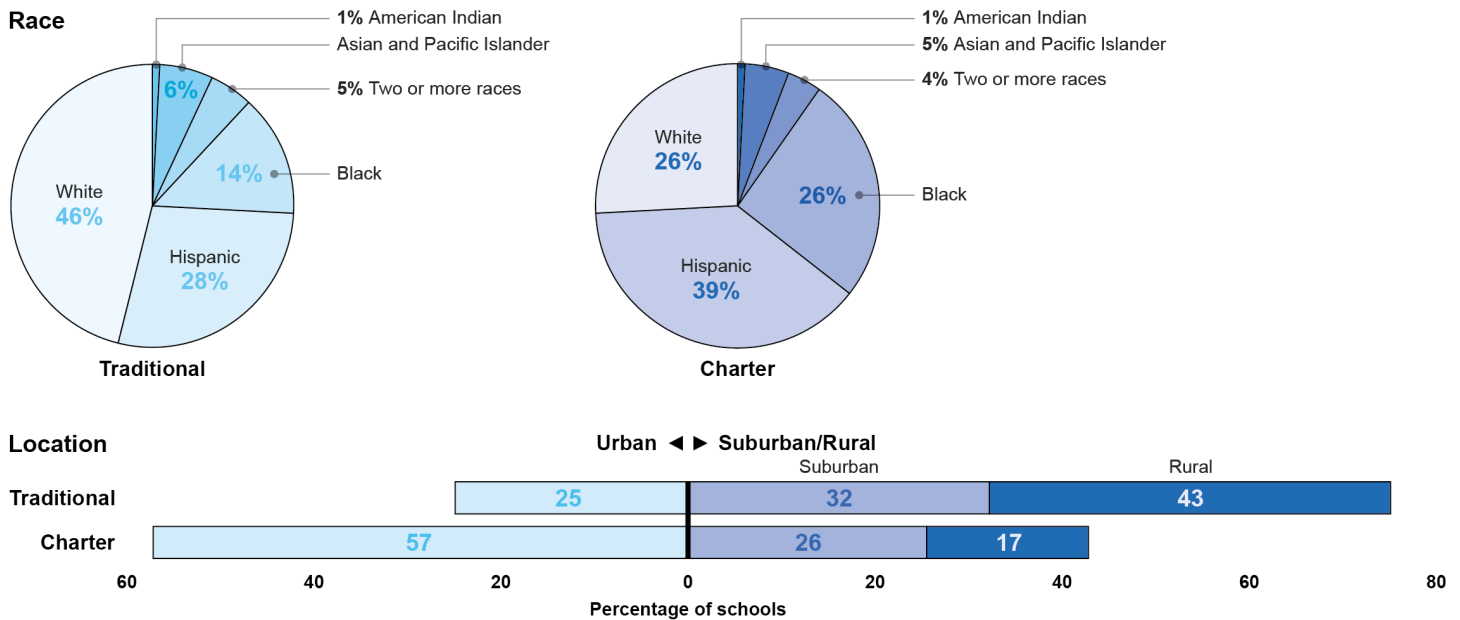
Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

However, the growth or decline of the charter school sector varied widely across states. Nineteen states and two territories had at least a 10 percent increase in the number of charter schools between school years 2018-19 and 2022-23.¹¹ Twelve of those states had a decrease in the number of traditional schools in the same period. In contrast, four states—California, Kansas, Oklahoma, and Virginia—had at least a 10 percent decrease in the number of charter schools in the same period; three of those states also had a decrease in the number of traditional schools.

¹¹The 19 states were Alabama, Alaska, Arkansas, District of Columbia, Florida, Georgia, Idaho, Indiana, Iowa, Maine, Minnesota, Mississippi, Missouri, Nevada, New Hampshire, New York, Rhode Island, Texas, and Washington. The two territories were Guam and Puerto Rico.

In school year 2022-23, charter schools had a higher percentage of students eligible for free or reduced-price lunch (55 percent) than traditional schools (51 percent). They also served a higher percentage of Black and Hispanic students than traditional schools. More than half of charter schools in school year 2022-23 were in urban areas (see fi

Figure 2: Key Characteristics of Traditional Schools and Charter Schools, School Year 2022-23



Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Accessible Data for Figure 2: Key Characteristics of Traditional Schools and Charter Schools, School Year 2022-23

	Traditional	Charter
American Indian	1	1
Asian and Pacific Islander	6	5
Two or more races	5	4
Black	14	26
Hispanic	28	39
White	46	26

	Urban	Suburban	Rural
Traditional	24.9	32.2	42.9
Charter	57.2	25.5	17.3

Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Note: Percentages in the pie charts may not sum to 100 due to rounding. The category “American Indian” includes students of American Indian and Alaska Native heritage. The category “Asian and Pacific Islander” includes students of Asian, Pacific Islander, and Native Hawaiian heritage.

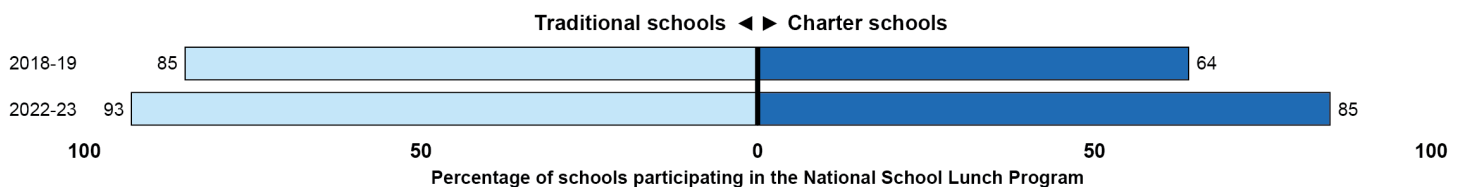
Charter School Participation in the National School Lunch Program Has Increased over the Past 5 Years, but Little Is Known about Factors Affecting Participation

Eighty-five Percent of Charter Schools Participated in the National School Lunch Program, with Variation among States and Schools

Overall Trends

Between school years 2018-19 and 2022-23, the percentage of charter schools nationwide that participated in NSLP increased from 64 percent to 85 percent, according to our analysis of CCD data. This represented a net increase of 1,824 schools and about 926,000 students. Charter schools' growth in NSLP participation exceeded growth at traditional schools during the same period (21 percentage points compared to 8 percentage points). However, as of school year 2022-23, charter school participation remained lower than participation among traditional schools—85 percent compared to 93 percent (see fig. 3).

Figure 3: Traditional School and Charter School Participation Rates in the National School Lunch Program, School Years 2018-19 and 2022-23



Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Accessible Data for Figure 3: Traditional School and Charter School Participation Rates in the National School Lunch Program, School Years 2018-19 and 2022-23

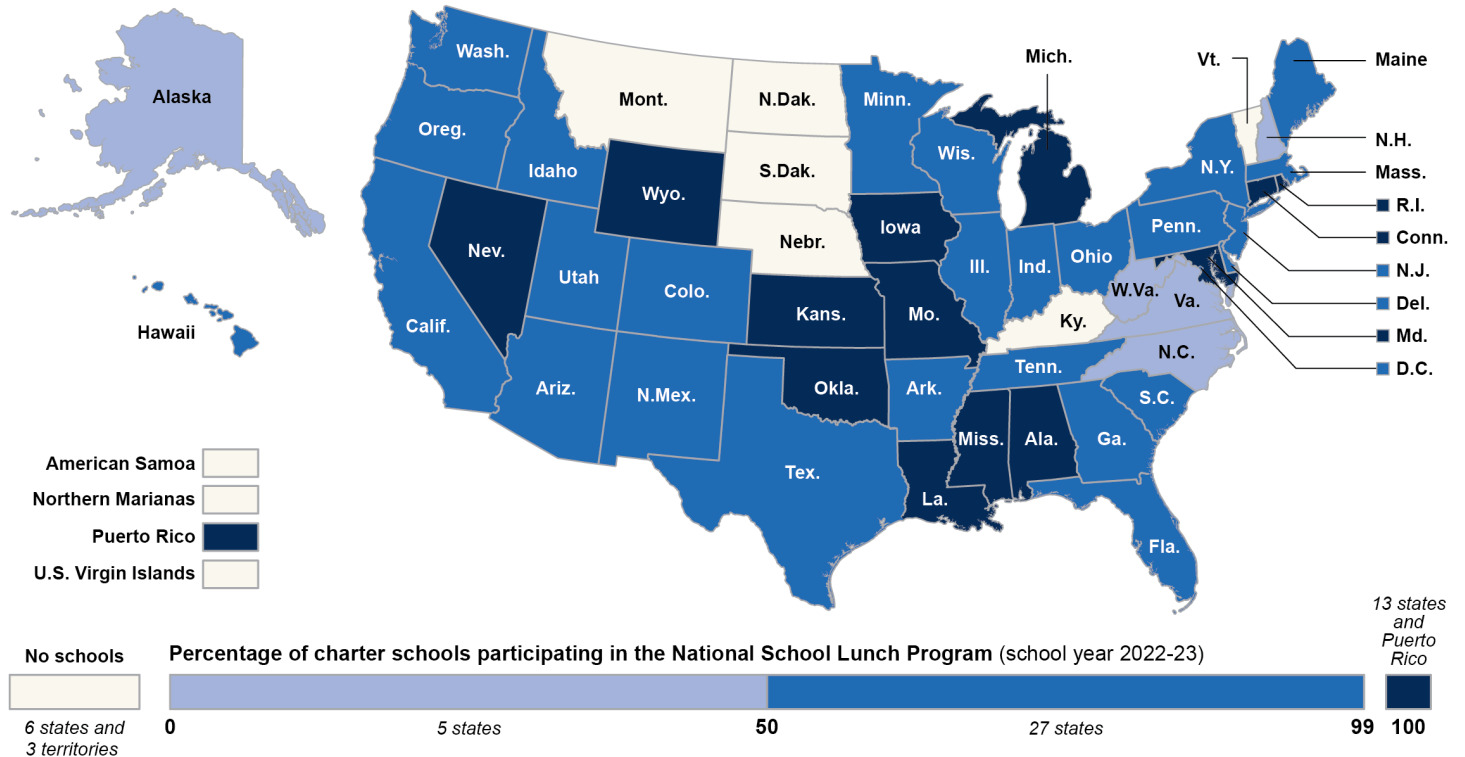
Percentage of charter schools participating in the National School Lunch Program

Year	Traditional schools	Charter schools
2018-19	85	64
2022-23	93	85

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

In school year 2022-23, participation rates for charter schools varied among states. For example, 100 percent of charter schools in 13 states and Puerto Rico participated in NSLP. In five states, fewer than 50 percent of charter schools participated (see fig. 4).

Figure 4: Charter School Participation Rates in the National School Lunch Program, School Year 2022-23



Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

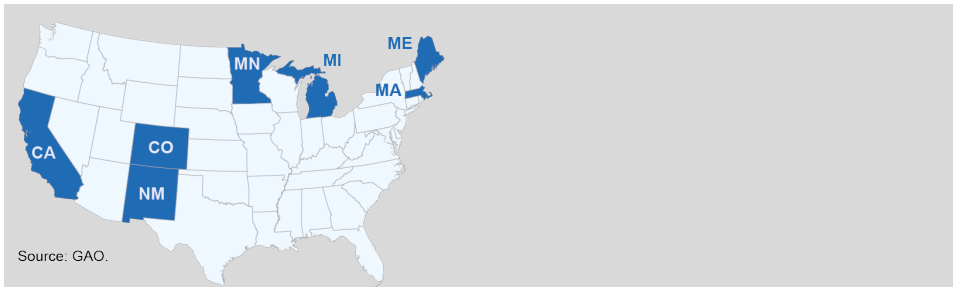
Accessible Data for Figure 4: Charter School Participation Rates in the National School Lunch Program, School Year 2022-23

Percentage of charter schools participating in the National School Lunch Program (school year 2022-23)

No schools	Less than 50%	Between 50% and 99%	100%
<ul style="list-style-type: none"> • Kentucky • Montana • Nebraska • N. Dakota • S. Dakota • Vermont • American Samoa • Northern Marianas • U.S. Virgin Islands 	<ul style="list-style-type: none"> • Alaska • New Hampshire • N. Carolina • Virginia • W. Virginia 	<ul style="list-style-type: none"> • Arizona • Arkansas • California • Colorado • Delaware • District of Columbia • Florida • Georgia • Hawaii • Idaho • Illinois • Indiana • Maine • Massachusetts • Minnesota • New Jersey • New Mexico • New York • Oregon • Ohio • Pennsylvania • S. Carolina • Texas • Tennessee • Utah • Washington • Wisconsin 	<ul style="list-style-type: none"> • Alabama • Connecticut • Iowa • Kansas • Louisiana • Maryland • Michigan • Mississippi • Missouri • Nevada • Oklahoma • Rhode Island • Wyoming • Puerto Rico

Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Note: Guam did not report National School Lunch Program participation for its four charter schools in school year 2022-23 and is not shown in the figure. The District of Columbia has been counted as a state in this figure.



Source: GAO.

Universal School Meals

Seven states with charter schools have enacted laws to make school meals available to students free of charge, according to the Food Research and Action Center. According to state documents, the policies in California, Colorado, Maine, Massachusetts, Michigan, Minnesota, and New Mexico provide for supplemental funding from the state to cover the costs of providing meals. Although commonly known as “universal school meal” policies, states vary in their implementation of these policies.

Approaches Can Vary across States

- **California’s** policy applies to all schools, according to state documents. Schools must offer breakfast and lunch free of charge to all students. Schools are required to participate in school meal programs to qualify for state supplemental funding.
- **New Mexico’s** policy applies to certain schools that already participate in school meal programs. Those schools, which include charter schools, must provide breakfast and lunch free of charge to all students who request a meal. The policy also includes state supplemental funding to improve meal quality.

Source: GAO summary of Food Research and Action Center and selected state documents, and 2023 N.M. Laws, ch. 30, §§ 1-6. | GAO-25-106846

Variation in charter school participation in NSLP among states may be affected by state policies, according to our data analysis and review of policies from selected states. For example, in California, the charter school participation rate increased from 6 percent in school year 2018-19 to 99 percent in school year 2022-23. In that time, California made some changes to state policies. In 2018, the state required charter schools to provide one free or reduced-price meal to eligible students and the state provided supplemental funding if schools participated in school meal programs. Subsequently, California implemented a universal school meal policy, starting in school year 2022-23, that expanded the state’s requirements to make available both a nutritionally adequate breakfast and lunch free of charge to all students.

Characteristics of Participating and Non-Participating Charter Schools

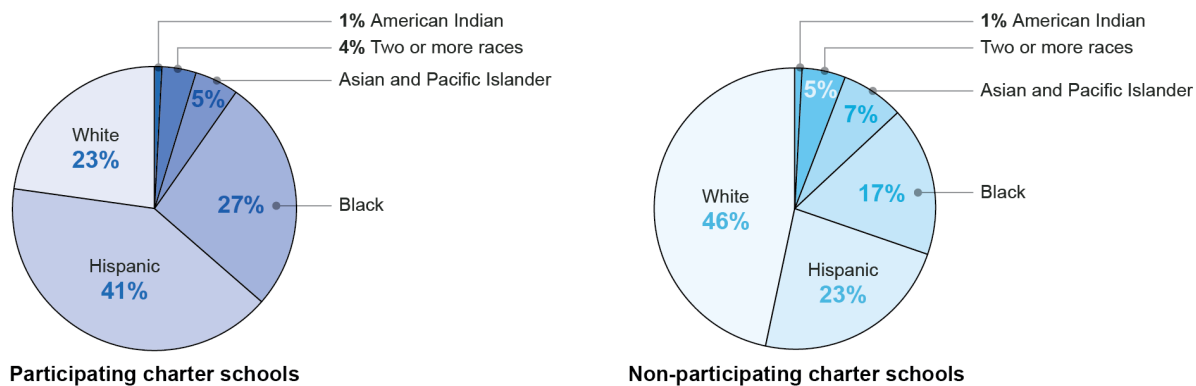
Charter schools that participate in NSLP have slightly different characteristics than charter schools that do not, with respect to the percent of students eligible for free or reduced-price lunch, students’ race and ethnicity, and school location.

Free or reduced-price lunch eligibility. Nationally, participating charter schools had a much higher percent of students who are eligible for free or reduced-price lunch (62 percent) compared to non-participating charter schools (7 percent) in school year 2022-23, according to our analysis of CCD data. The percentage of students eligible for free or reduced-price lunch enrolled at non-participating schools—which represents about 28,000 students—has substantially decreased compared to school year 2018-19. In school year 2018-19, 45 percent of students (or approximately 480,000) enrolled at non-participating charter schools were eligible for free or reduced-price lunch.

While the nationwide percentage of students eligible for free or reduced-price lunch enrolled at non-participating charter schools was relatively low for school year 2022-23, this percentage varied among states. For example, 19 states had students eligible for free or reduced-price lunch enrolled in non-participating charter schools. In nine of those states, more than 30 percent of students enrolled at non-participating charter schools were eligible for free or reduced-price lunch. In contrast, four of those states had 5 percent or less of students eligible for free or reduced-price lunch enrolled in non-participating charter schools.

Race and ethnicity. While the data vary by state, overall, participating charter schools had a higher percentage of Black and Hispanic students (68 percent combined) compared to non-participating charter schools (40 percent combined). See fig. 5.

Figure 5: Student Race and Ethnicity in Charter Schools that Did or Did Not Participate in the National School Lunch Program, School Year 2022-23



Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Accessible Data for Figure 5: Student Race and Ethnicity in Charter Schools that Did or Did Not Participate in the National School Lunch Program, School Year 2022-23

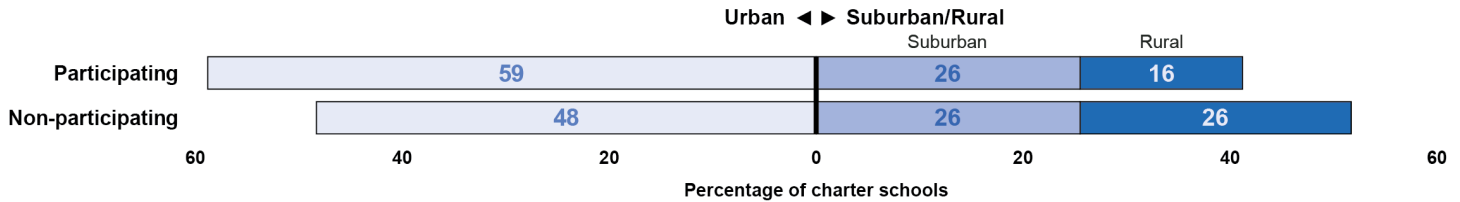
	Participating charter schools	Non-participating charter schools
American Indian	1	1
Two or more races	4	5
Asian and Pacific Islander	5	7
Black	27	17
Hispanic	41	23
White	23	46

Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Note: Percentages may not sum to 100 due to rounding. The category “American Indian” includes students of American Indian and Alaska Native heritage. The category “Asian and Pacific Islander” includes students of Asian, Pacific Islander, and Native Hawaiian heritage.

School location. More charter schools that participated in NSLP were in urban areas than rural areas based on the most recent year of data. In contrast, a higher percentage of non-participating charter schools were in rural areas compared to participating charter schools (see fig. 6). These percentages also varied by state. For example, in school year 2022-2023, three of Virginia’s seven charter schools participated in NSLP and were in urban areas. All of Iowa’s four charter schools participated in NSLP and were in rural areas.

Figure 6: Location of Charter Schools that Did or Did Not Participate in the National School Lunch Program, School Year 2022-23



Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Accessible Data for Figure 6: Location of Charter Schools that Did or Did Not Participate in the National School Lunch Program, School Year 2022-23

Percentage of charter schools

	Urban	Suburban	Rural
Traditional	58.8	25.5	15.7
Charter	48.3	25.5	26.2

Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

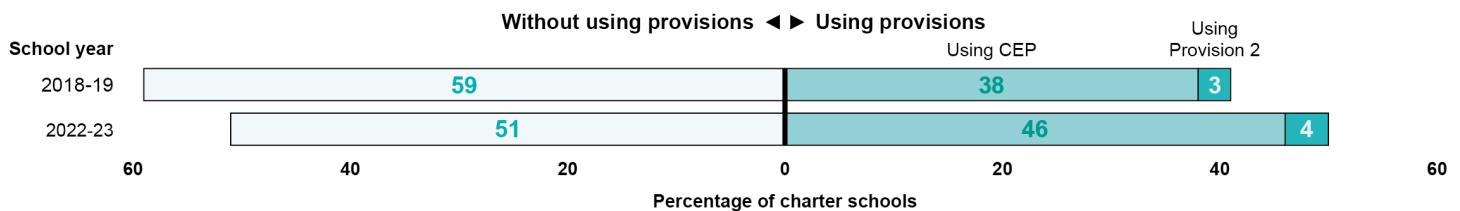
Note: Percentages may not sum to 100 due to rounding.

Non-participating schools may use alternatives to NSLP for meals. Officials from the two non-participating schools we interviewed said that their students generally brought their lunch from home. Both schools have non-traditional school schedules, with students in the building for a limited time, which can make it difficult to offer meals. According to one school’s written policy, when the students are in the building, parents must ensure the student has food, either by packing a lunch or providing money for the student to purchase food. Officials said food can be purchased from the school’s vending machine or student-run clubs that occasionally sell food to fundraise. Officials said that the school staff also keep shelf-stable food on hand, such as ramen noodle packets, in case students forget lunch and do not have money. Officials said that the school does not provide meals, in part because parents expressed that school-provided meals were not a priority for them.

Use of Special Eligibility Provisions

Among charter schools that participated in NSLP in school year 2022-23, about half did so without using a special eligibility provision. However, an increasing number of schools used provisions—particularly the Community Eligibility Provision—between school years 2018-19 and 2022-23 (see fig. 7).

Figure 7: Charter School Use of Special Eligibility Provisions, School Years 2018-19 and 2022-23



Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Accessible Data for Figure 7: Charter School Use of Special Eligibility Provisions, School Years 2018-19 and 2022-23

Percentage of charter schools

Year	Without using provisions	Using CEP provision	Using provision 2
2018-19	59	38	3
2022-23	51	46	4

Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Note: Special eligibility provisions can be used by schools to reduce some administrative requirements by allowing students to be certified, or schools to have a set percentage of students claimed at the free, reduced price, or paid lunch rates, for multiple years, when certain requirements are met. Both the Community Eligibility Provision (CEP) and Provision 2 reduce administrative work for schools and expand access to school meals. CEP allows schools, groups of schools, or school districts in high-poverty areas to offer no-cost meals to all enrolled students. Provision 2 allows schools to determine student eligibility once every 4 years instead of yearly using household applications. Percentages in the figure may not sum to 100 due to rounding.

Officials we spoke with from four of the six charter schools that use the Community Eligibility Provision said they do so because it reduces the amount of administrative work for school staff, such as collecting and verifying household applications for free or reduced-price lunch. Officials from two of the six schools said that their state agencies encouraged them to participate using the Community Eligibility Provision to maximize federal reimbursement funds.

Officials we interviewed from two schools said that because of their school’s student population they prefer Provision 2, which relies on household applications for eligibility determinations, but allows the school to offer meals at no cost to all students for a 4-year period.¹² Specifically, their schools have potentially eligible families who may not participate in programs used for direct certification, such as the Supplemental Nutrition Assistance Program. Officials from one school said that collecting applications allows them to more accurately count students who are eligible for free or reduced-price lunch.

FNS Has Collected Limited Information on Factors Affecting Charter School Participation

School Breakfast Program Participation in Selected States

The Food and Nutrition Service has not collected data on charter school participation in the School Breakfast Program in the last 5 years. However, the four selected states have. According to state-provided data, the School Breakfast Program participation rates among charter schools during school year 2023-24 were:

- California, 87 percent
- Florida, 95 percent
- New Mexico, 74 percent
- Ohio, 88 percent.

We asked knowledgeable agency officials about these data, and determined the participation rates were sufficiently reliable for our purposes.

Source: Data and other information from state agency officials and the Food and Nutrition Service. | GAO-25-106846

¹²Under Provision 2, schools determine the number of students eligible at the federal free, reduced-price, and paid rates based on household applications and direct certification in a base year (i.e., year 1). These rates then apply for a 4-year period, and schools do not need to redetermine eligibility each year within that time. At the end of this period, schools can apply to the state agency for a 4-year extension.

FNS currently does not have information on factors that would explain variation among states or charter schools in NSLP participation rates. CCD data can be used to quantify the number of charter schools that participate in NSLP and their characteristics. However, the data do not provide information to explain reasons for variation among states and schools or considerations affecting participation. For example, officials from 10 of the 14 schools said that the cost of operating school meal programs—which is not captured in CCD—was an initial or ongoing consideration to participating in NSLP. Specifically, officials from several of these schools said they used the school’s general funds to either initially sustain or continually maintain their programs because federal reimbursement funding for meals served did not cover the full cost of operating the programs. As noted earlier, CCD also does not have information on the School Breakfast Program.¹³

In the last 5 years, FNS has not reported on charter school participation in school meal programs, but it provided limited information in earlier years through its annual child nutrition operations studies.¹⁴ Specifically, its published studies in school years 2015-16, 2016-17, and 2017-18 found that a majority of charter schools participated in both NSLP and the School Breakfast Program in the states that completed their surveys.¹⁵ For the 2018-19 study, FNS tried to collect information to better understand factors that affect charter schools’ participation in school meal programs. The study’s questions included whether charter schools participate as their own school food authority (SFA), challenges that states think charter schools face with school meal program participation, and how states reach out to non-participating charter schools about school meal programs. FNS officials said the agency wanted to explore these issues because charter school participation was an understudied area. However, FNS did not publish the data due to performance concerns with the contractor that administered the study, which affected data quality, according to FNS officials, and FNS has not explored these issues since.

FNS officials said the agency does not have plans to examine charter schools in more depth for several reasons. First, the agency does not see a need to specifically study charter schools because all schools participating in school meal programs are held to the same standards by FNS. Also, the agency’s focus has shifted in recent years to other topics of study, such as general supply chain issues. Moreover, officials said including a sufficient number of charter schools in its sampling frame to obtain statistically valid findings to be able to report on charter schools separately would be resource intensive—given that the total number of charter schools is relatively small compared to traditional schools.¹⁶ This understanding was based on the number of charter schools operating in 2017, and the number of charter schools nationwide has increased since that time, as described earlier. Although the agency would still likely need to oversample charter schools, it has not recently assessed the cost or feasibility of including charter schools in a future child nutrition operations study in order to report on them separately or studying charter schools in other ways.

¹³In March 2024, during the course of our review, officials from the National Center for Education Statistics, which administers CCD, said that they will be submitting a request in fall 2024 to seek public input to collect data on the School Breakfast Program.

¹⁴FNS’s administrative program data on school meals do not include information that could identify charter schools.

¹⁵U.S. Department of Agriculture, Food and Nutrition Service, *Child Nutrition Program Operations Study (CN-OPS-II): SY 2015-16* (Alexandria, Va.: Dec. 2019); U.S. Department of Agriculture, Food and Nutrition Service, *Child Nutrition Program Operations Study (CN-OPS-II): SY 2016-17* (Alexandria, Va.: June 2021); U.S. Department of Agriculture, Food and Nutrition Service, *Child Nutrition Program Operations Study (CN-OPS-II): SY 2017-18* (Alexandria, Va.: Nov. 2022)

¹⁶FNS officials said the agency has included charter schools in sampling frames for many studies, such as the child nutrition operations studies, but does not always report the results for charter schools separately.

The National School Lunch Act authorizes FNS to conduct child nutrition operations studies, which provide information to FNS on state and SFA policies, practices, and needs regarding school meal operations.¹⁷ Three of the four FNS regional offices we spoke with said that knowing more about challenges charter schools face in participating in school meal programs would help the offices know what additional support they could provide. Additionally, a purpose of the agency's child nutrition program evaluations is to help achieve its strategic goal to ensure all Americans have access to healthy, affordable food.¹⁸

The topics that FNS tried to explore in the 2018-19 study—such as challenges charter schools face participating in school meals and the ways that states reach out to non-participating schools—could shed light on reasons for varied participation in school meal programs among states and schools. FNS could leverage lessons learned from the school year 2018-19 child nutrition operations study to assess whether it could obtain reliable information on charter schools' participation. It could also use more recent data on the number of charter schools to assess the cost of including a sufficient number of charter schools in its sampling for future child nutrition operation studies to obtain statistically valid findings for those schools. By evaluating the feasibility of collecting such information on charter school participation in school meal programs, FNS can help charter schools operate these programs more effectively and broaden students' access to nutritious meals.

Charter Schools in Selected States Identified Facility, Vendor, and Staffing Challenges When Participating in School Meal Programs

Officials from the 14 participating charter schools identified three key challenges—related to facilities, vendors, and staffing—and some ways in which they have mitigated those challenges.

Freestanding Structure for Food Service



A California charter school that leases space and receives prepared meals from the local district to serve to its students had to find a different area for meal service when its leased space was reduced. Officials learned from another school about a company that provides repurposed shipping containers that could be used to hold equipment to heat and serve meals. Officials said the structure's small physical footprint fit into the school's limited space.

Source: Interview with school officials; charter school (photo). | GAO-25-106846

Facilities challenges. Officials from nine participating charter schools reported that they had limited kitchen or cafeteria facilities, which can make it difficult to prepare or serve food to students. Two of these charter schools

¹⁷The National School Lunch Act authorizes USDA to perform annual national performance assessments of NSLP and the School Breakfast Program. See 42 U.S.C. § 1769i(a). The assessments reviewing school year 2020-21 through school year 2022-23 are called the School Meals Operations Study. The prior assessments were called the Child Nutrition Program Operations Study.

¹⁸U.S. Department of Agriculture, *Strategic Plan Fiscal Years 2022-2026*.

operated in non-traditional buildings—such as strip malls or museums—with limited facilities for meals. This affected how staff prepared and served food to students. For example, officials from one Florida charter school, located in a museum, said they set up a makeshift serving area in the hallway. The food warming ovens and serving areas are on two different floors, so the staff walk up and down stairs multiple times carrying hot food and serve food in the hallway. Students then eat either in the museum’s outdoor seating area or in the classroom.

Officials from four of these nine charter schools said they do not own their facilities, which can make it difficult to add to or upgrade their facilities. Two California charter schools we spoke with are located in traditional school buildings, which the school district owns.¹⁹ Officials from one of those schools said their school district has not supported major improvements, such as kitchen upgrades, because of the cost. We previously reported that charter schools have had challenges securing building space, due to limited access to government or private funding, and inconsistent support from local governments and school districts.²⁰

Additionally, officials from three of the nine charter schools said that there was limited storage space for the volume of food or products they need or the number of students they serve (see fig. 8). One charter school official said because they lack storage equipment, they repeatedly move pre-packaged food into and out of storage, which is challenging due to the volume of food.

¹⁹California state law requires that school districts provide charter school students with “reasonably equivalent” facilities to those of traditional schools. Cal. Educ. Code § 47614(b).

²⁰GAO, *K-12 Education: Challenges Locating and Securing Charter School Facilities and Government Assistance*, [GAO-21-104446](#) (Washington, D.C.: Sept. 27, 2021).

Figure 8: Examples of Limited Storage Spaces

Extra office furniture kept inside dry food pantry.



Large refrigerator stored in gym/cafeteria.



Staff jackets stored in dry food pantry.



Small work desk in the corner of a dry food pantry.



Source: GAO and charter school. | GAO-25-106846

Accessible Text for Figure 8: Examples of Limited Storage Spaces

Collage of photos shows conditions at various charter schools:

- Extra office furniture kept inside dry food pantry.
- Staff jackets stored in dry food pantry.
- Large refrigerator stored in gym/cafeteria.
- Small work desk in the corner of a dry food pantry.

Source: GAO and charter school. | GAO-25-106846

To address challenges related to facilities, charter school officials reported modifying existing space, increasing storage, and using vendors.

- **Modifying existing space.** Officials from five of the nine charter schools said they modified existing space to create additional food service areas because of limited cafeteria space (see fig. 9). For example, two schools in states with mild weather set up areas for students to sit and eat outside, such as tents and tables. Other schools offered classrooms or used the gym as eating areas.

Figure 9: Examples of Charter Schools Modifying Existing Space



Some charter schools use outdoor seating for eating areas, which may not always be available due to inclement weather.



Large multipurpose room serves as gym and cafeteria.



Temporary meal service area in hallway.

Source: GAO and charter schools. | GAO-25-106846

Accessible Text for Figure 9: Examples of Charter Schools Modifying Existing Space

Collage of photos shows conditions at various charter schools:

- Pair of photos shows charter schools that use outdoor seating to serve meals, which may not always be available due to inclement weather.
- Large multipurpose room serves as gym and cafeteria.
- Temporary meal service area in hallway.

Source: GAO and charter school. | GAO-25-106846

- **Increasing storage.** Two of the nine charter schools reported using strategies to increase storage space, such as buying more equipment or using local resources. For example, to purchase and store food in bulk, one charter school bought more freezers. It also coordinated with a local grocery store and the public health department to store some food at the grocery store, as needed.

- *Using vendors.* Seven of the nine charter schools that reported facilities-related challenges contracted with vendors that provide prepared meals.²¹ These schools had prepared meals delivered daily, limiting the need for food storage and food preparation equipment. Instead, schools used equipment that required less kitchen space, such as warming ovens. Information from the four selected states showed that a large portion of charter schools in these states used vendors during school year 2023-24. Specifically, in New Mexico and Ohio more than 80 percent of charter schools used vendors, in California more than 50 percent used vendors, and in Florida more than 40 percent used vendors, based on information provided by state officials.

Vendor challenges. Officials from 11 charter schools that participate in school meal programs reported that using vendors comes with its own challenges. For example, officials from four of the 11 charter schools said that a limited number of vendors were willing to work with school meal programs or with charter schools. For instance, officials from one Florida school said that fewer vendors have bid on requests for proposal in recent years. Some charter school and state officials we spoke with said that vendors may sometimes find working with charter schools less appealing financially, as they tend to be smaller and do not order as much food as traditional schools. Officials from one Ohio school said that the limited number of vendors has meant that existing vendors can charge higher prices, which affects the overall affordability of operating school meal programs.

In addition, charter schools can end up in challenging situations when vendors cancel contracts or pause operations. Officials from three charter schools we interviewed across three selected states said they had vendors cancel contracts or pause operations in the middle of the school year, which forced these schools to quickly find other avenues for meals. One official said that the sudden contract cancellation affected school meal operations at 30 of the 70 charter schools in its network statewide. Another charter school received a 48-hour notice from its vendor that it was pausing operations and would not be able to provide food for 2 days.

²¹For the purposes of this report, we use the term vendor to include companies that produce prepared or pre-packaged meals (e.g., caterers) and food service management companies that may provide both meals and staff to serve the meals.

Healthy and Locally Sourced Meal Options in New Mexico



New Mexico's Healthy Universal School Meals program stipulates that the Public Education Department issue meal quality improvement requirements, which may include the following elements:

- cooking meals from scratch
- using locally sourced food
- creating culturally relevant menus
- incorporating parental feedback on meals.

Officials from two New Mexico charter schools said that they serve locally sourced food with menus that are culturally relevant for their students, such as enchiladas, chicos (fried corn crushed with beans), and blue corn patties.

Source: 2023 N.M. Laws, Ch. 30, §§ 1-6 and interviews with charter school officials; GAO (photo). | GAO-25-106846

To mitigate some of the challenges associated with using vendors, some charter schools we interviewed have been able to use multiple vendors, enter into cooperative agreements for bulk food purchases, or incorporate some scratch cooking.

- *Using multiple vendors.* To address canceled vendor contracts or stoppages, some charter schools have established relationships with multiple vendors or the local school district. Officials from three charter schools said that using multiple vendors, when possible, rather than relying on one could mitigate the risk of being unable to provide food due to vendor closures or canceled contracts.
- *Entering into cooperative agreements.* Officials from two charter schools said they saved on food and other products by entering into cooperative purchasing agreements for bulk food purchases with other traditional and charter schools. One charter school official said this arrangement helped their school negotiate bids with vendors and purchase products in bulk.
- *Incorporating scratch cooking.* Officials from seven charter schools—including some that reported receiving prepared meals—said they have incorporated scratch cooking into their school meal programs. School officials said scratch cooking offered benefits, such as an increased variety in the food schools can offer and higher food quality. For example, one school upon improving its kitchen facilities, was able to increase the types of food the school can offer.

Staffing challenges. Officials from 10 participating charter schools reported a shortage of staff or having inexperienced staff, which can make it difficult to operate school meal programs.

Officials from six schools reported that staff shortages can result in officials serving in multiple roles. For instance, one official said he spends one-third of his time operating the school meal program for over 950 students, in addition to being the school's executive director, chief business official, and compliance officer.

Officials from two charter schools reported having inexperienced staff, which can make it difficult to meet the numerous school meal program requirements. For example, officials from a New Mexico charter school said they did not have a full understanding of the school meal program requirements when they first started participating in the program. They told us that they had to learn as they went, and having the state conduct an administrative review helped them better understand program requirements and resources available to help meet the requirements.²²

To mitigate staffing challenges, some schools we interviewed tried to hire staff, with mixed results, or participate as part of a district's SFA.

- *Hiring.* Charter schools reported mixed results with hiring staff to address staffing challenges. For example, some officials said that hiring any staff—including experienced staff—was difficult because charter schools must compete with larger traditional schools, which can have more resources. On the other hand, two charter schools were able to manage staffing challenges by hiring experienced staff who had previously operated meal programs at other public schools. One Ohio charter school official, who was establishing the program at a new school, had worked for many years in a school district's food services department. Because of this prior experience, the official said they were able to operate the school meal program smoothly in compliance with program requirements.
- *Participating in a district SFA.* Officials from two charter schools said that they participated in school meal programs through their local district's SFA due to limited staff. The local district manages all aspects of operating the program, including providing meals, verifying student eligibility for free or reduced-price lunch, and counting the number of reimbursable meals served daily. These school officials said that they did lose some autonomy by receiving meals through their district, such as following the district's menu or needing to align their school calendar with the district's calendar to ensure they could get meals. Overall, however, these were acceptable trade-offs. Officials from one charter school said they would have preferred to participate in their district's SFA, but it was not an option for various reasons, including the district not having the capacity to provide additional meals.

²²FNS requires state agencies to conduct administrative reviews on a 5-year cycle to ensure SFAs are complying with program requirements. Each SFA in a state should have received one administrative review at least once every 6 years. 7 C.F.R. § 210.18.

Selected States and FNS Offer Training, Informational Resources, and Funding that Could Mitigate Some Challenges

Assistance Available to All School Food Authorities Could Help Charter Schools

Florida's Process to Onboard Schools New to Operating School Meal Programs

Florida's Department of Agriculture and Consumer Services, which oversees school meal programs in the state, has a process for schools that want to operate a school meal program.

- **Initial conference call:** Officials talk to an interested school and follow up with resources—such as what a school should consider before applying to operate a school meal program.
- **Site visit:** Officials visit a school after it applies, to determine if it can successfully operate the program.
- **Training:** The school's food service staff must complete specific training sessions while the application is under review. Topics include federal program requirements and reviews.
- **First reimbursement claim:** Officials review a newly-participating school's claim to determine if it has been completed correctly.
- **Follow up contact:** The state contacts the school in 6 months if its first claim is correct; if not, the state will contact the school in 3 months.

Officials from one charter management organization that has more than 15 schools in Florida said the state's training helped them determine that it was not viable to participate in school meal programs on their own because of administration and training requirements. Instead, their organization was able to offer meals at some of its schools through the local school district's program.

Source: Florida state documents and interviews with state and charter school officials. | GAO-25-106846

The four selected states and FNS provide general assistance—including training, informational resources, and funding opportunities—that could mitigate some of the challenges charter schools face.²³ With a few exceptions, this assistance is available to all SFAs, and is not targeted to charter schools.

Training. The four selected states and FNS provide trainings to all SFAs to promote understanding of program requirements. For example, Florida and Ohio officials said they have processes that new SFAs must complete prior to operating school meal programs to ensure they meet requirements. FNS provides webinars on topics, such as procurement requirements.

In addition, we identified charter-school specific trainings in three states. For example, in 2023, New Mexico held training sessions for charter schools that had to begin operating their own school meal programs after leaving the district's SFA. Additionally, FNS officials presented an overview of school meal programs at a 2016 training session provided by Education for charter schools.

Informational resources. The four selected states provided informational resources to help mitigate several challenges in operating school meal programs. For example, Florida provides SFAs with a list of vendors—and the counties they serve—that provide meals that meet program nutritional requirements. Officials at one New

²³Other states can provide assistance that could help charter schools address challenges, but we focused on assistance provided by the four selected states—California, Florida, New Mexico, and Ohio.

Mexico school with inexperienced staff said that a state official provided a template to schools to simplify and more accurately verify meal counts, which helped reduce administrative work.

The four selected states provide informational resources through direct points of contact, state websites, or collaboration with the state agencies overseeing charter schools. For example, within the Ohio Department of Education, the two offices overseeing nutrition and charter schools collaborate to ensure state nutrition officials are aware of new charter schools and that charter schools are aware of opportunities related to school meals, according to state nutrition officials.

California Kitchen Infrastructure and Training Funds

In 2021 and 2022, California appropriated a combined total of \$750 million from the state general fund to support school kitchen infrastructure upgrades and food service staff training, according to state agency documents. These non-competitive funds were made available to schools participating in school meal programs. The funds were intended to increase access to nutritious foods, and help schools implement the state's Universal Meals Program. California officials said they provided these funds in 2023 as well.

Charter Schools' Experiences

Officials from three charter schools we spoke with had used these funds. One school used the funds to buy a new refrigerator and freezer and had plans to replace another refrigerator for milk, in addition to funding staff training. One school used the funds to buy serving trays and umbrellas for their eating area, which is outdoors. Another school used the funds to purchase additional freezers and a dishwasher. That school's official said they had to use funds to purchase mobile equipment since they operated in leased space.

Source: California Department of Education documents and interviews with state and charter school officials. | GAO-25-106846

FNS provides informational resources to all SFAs by posting information on the agency's website, sponsoring the Institute of Child Nutrition as its national resource center, disseminating information through state agencies, and presenting at national conferences on school meals and related programs.²⁴ In 2018, FNS issued a policy memorandum specific to charter schools that discussed eligibility requirements to participate in the school meal programs, SFA responsibilities, links to resources, and the roles and responsibilities of charter management organizations.²⁵ The memorandum, which is available by searching FNS's website, was also initially disseminated to SFAs through state agencies.

Funding and supplemental programs. Three selected states provide grants or other opportunities that could help address charter schools' challenges related to vendors, facilities, and staffing. Specifically, as of 2023, California, Florida, and New Mexico provide state grants for schools to renovate kitchens or purchase equipment.²⁶ Officials from four charter schools in these states said they have used the funds to purchase equipment or design kitchen space.

Charter schools also used supplemental programs and grants administered by FNS, which may mitigate some challenges reported by charter schools (see table 1). These programs and grants support SFAs already participating in school meal programs. For example, Ohio officials said that charter schools in the state have

²⁴The Institute of Child Nutrition was established under the Richard B. Russell National School Lunch Act. 42 U.S.C. § 1769b-1(a)(2).

²⁵FNS first issued the memorandum in 2008, and then updated it in 2018. USDA Food and Nutrition Service, *National School Lunch Program and School Breakfast Program: Questions and Answers for Charter Schools (SP 03-2019)*.

²⁶In September 2024, New Mexico officials said that they are not sure if there will be funding for these grants in school year 2024-25.

tended to use Equipment Assistance Grants to purchase equipment useful for meals provided by vendors, such as warming ovens and milk coolers.

Table 1: Selected Supplemental Programs and Federal Funding Available to Support School Meal Programs and Number of Selected Schools Participating, as of January 2024

Program or funding source	Description (<i>Number of selected schools that reported participating</i>)
Equipment Assistance Grants	Schools can use these grants, which have been provided since fiscal year 2009, to purchase equipment needed to serve healthier meals, among other things. In fiscal year 2024, FNS made available \$10 million to state agencies to distribute on a competitive basis to school food authorities or individual schools participating in the National School Lunch Program (NSLP). (4 schools)
Fresh Fruit and Vegetable Program	Elementary schools participating in NSLP can receive a grant to purchase fresh fruits and vegetables to serve during the school day. The program prioritizes schools with a high percentage of students eligible for free or reduced-price lunch. (5 schools)
Supply Chain Assistance funds ^a	School food authorities can use these funds to purchase unprocessed or minimally processed domestic foods. These funds have been provided annually since school year 2021-22 in response to supply chain disruptions that began during the COVID-19 pandemic. State agencies distribute funds to all school food authorities participating in NSLP or the School Breakfast Program that apply. (10 schools)
USDA Foods in Schools	School food authorities that participate in NSLP can get domestic foods, such as produce and meat, which USDA purchases in bulk and at lower prices on behalf of the schools. (7 schools)

Source: U.S. Department of Agriculture Food and Nutrition Service (FNS) documents and interviews with charter school officials. | GAO-25-106846

Note: We interviewed 14 charter schools that participated in NSLP. Some charter schools used more than one program or grant.

^aSupply Chain Assistance funds are administered by FNS, but provided through USDA’s Commodity Credit Corporation.

At the same time, officials from some schools we spoke with said that it could be challenging to participate in these programs or grants due to the amount of paperwork required to administer the program or grant. Others said that some of these opportunities had limited use for charter schools given charter schools’ use of vendors and challenges with limited facilities. For example, officials from one charter management organization said that none of the more than 30 schools in its SFA participate in the USDA Foods in Schools program due to a lack of storage.²⁷

Some Charter Schools Reported that They Would Benefit from Additional Outreach and Information

Officials from eight of the 14 participating charter schools we spoke with said they would benefit from additional outreach or information, either from their state agencies or FNS. For example, officials from four of the eight charter schools said additional assistance would be helpful, including information or extended training for schools new to operating school meal programs. Officials from two charter schools said that direct outreach

²⁷We recently reported on SFAs’ experiences, including challenges, with the USDA Foods in Schools program. GAO, *School Meals: USDA Should Address Challenges in its “Foods in Schools” Program*, [GAO-23-105697](#) (Washington, D.C.: June 14, 2023).

from FNS regarding available resources would be helpful. Officials from another school said that it would be helpful to have opportunities to connect with other charter schools or small schools that may face similar issues.

Most charter school officials we spoke with were unaware of some existing FNS resources that could help address some of their challenges. For example, officials from 12 of the 14 participating schools we spoke with were unfamiliar with FNS's 2018 memorandum for charter schools, which is an existing resource available on the agency's website. Additionally, although officials from 12 schools we interviewed had used training resources through the Institute of Child Nutrition, they were unfamiliar with the institute's Child Nutrition Sharing Site. This centralized site for state-developed resources is intended to facilitate knowledge sharing between states and schools. Moreover, while FNS shares program updates and other information on school meals at national conferences, officials from eight schools told us they do not attend these.

FNS has not conducted additional outreach to charter schools to share resources that could be useful for them. FNS officials said the agency has not done so because all schools participating in school meal programs must meet the same program requirements and can face similar challenges in operating the programs. Yet, FNS officials also said they know that smaller schools may struggle to operate school meal programs because of the program's many requirements. Additionally, the agency has provided targeted assistance to some groups in the past—such as training on the Farm to School grant for producers, rural communities, and tribal partners.

FNS's Equity Action Plan goals include ensuring that eligible populations have equitable access and opportunity to participate in FNS nutrition assistance programs, and that underserved communities are reached by partnering with others to address nutrition security equity issues.²⁸ Further, the National School Lunch Act calls for FNS to assist states with their school meal programs, including by developing and distributing training and technical assistance materials that are representative of best practices.²⁹ Charter schools tend to open and close more frequently than traditional schools. From school years 2018-19 to 2022-23, 15 percent of charter schools opened compared to 3 percent of traditional schools, based on our analysis of CCD data. Similarly, 11 percent of charter schools closed during that time frame, compared to 5 percent of traditional schools. Accordingly, taking additional steps to promote outreach and information dissemination to charter schools could help FNS reach its goal to expand access to school meal programs and help the schools ensure that students have access to healthy, nutritious food.

Conclusions

Nationwide, an increasing number of students are enrolled at charter schools, and an increasing number of charter schools are participating in school meal programs. However, charter schools may face different or greater challenges in operating these programs compared to traditional schools. These include operating in constrained facilities or without the infrastructure and support of a larger district. While FNS tried to collect information on factors affecting charter school participation in its school year 2018-19 child nutrition operations study, officials said this information was not usable. Since then, FNS has not explored these issues because other topics have been higher priority and, according to officials, additional research on charter schools was not needed and would be costly. However, FNS has not recently assessed whether it is cost-effective to obtain

²⁸Food and Nutrition Service, *Food, Nutrition, and Consumer Services: Equity Action Plan* (Washington, D.C.: July 2023).

²⁹42 U.S.C. § 1769b-1(f).

reliable information on charter schools' participation in school meal programs, such as by leveraging its efforts from the school year 2018-19 study or using more recent data on the number of charter schools to determine the cost of including those schools in future studies. As a result, FNS may be missing opportunities to better understand how to help charter schools and ensure that all students have access to healthy, affordable food.

Also, FNS provides a number of resources to help schools operate school meal programs and forums exist to share practices across states and schools. However, small schools or schools new to operating these programs—such as charter schools—may not always be aware of relevant resources and would benefit from additional outreach. By taking additional steps to promote information dissemination to charter schools, FNS can help achieve its goals to ensure equitable access to its programs.

Recommendations for Executive Action

We are making the following two recommendations to USDA:

The Secretary of Agriculture should ensure that the Administrator of FNS conducts an assessment to determine whether there are cost-effective ways to obtain reliable information on state-level variation in participation and factors that affect charter schools' ability to participate in school meal programs. (Recommendation 1)

The Secretary of Agriculture should ensure that the Administrator of FNS conducts additional outreach to share relevant information on school meal programs with charter schools. Such outreach could include encouraging state agencies to share reminders of existing resources with charter schools, such as FNS's memorandum on charter schools or the Child Nutrition Sharing Site. (Recommendation 2)

Agency Comments

We provided a draft of this report to USDA for review and comment. The agency concurred with both of our recommendations and also provided technical comments, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Secretary of Agriculture, and other interested parties. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or larink@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



Letter

Kathryn Larin, Director
Education, Workforce, and Income Security Issues

Appendix I: Additional Data by State on Charter Schools and Participation in the National School Lunch Program, School Year 2022-23

Tables 2 through 4 below are based on our analysis of the Department of Education’s Common Core of Data for school year 2022-23, the most recent data available at the time of our analysis. These tables provide state-level data on charter school participation in the National School Lunch Program, participating schools’ use of special eligibility provisions, and the number and percentage of students eligible for free or reduced-price lunch. States and territories without charter schools are not shown in tables 2 through 4. Additional information on how we analyzed these data is described at the beginning of the report.

Table 2: Charter School Participation in the National School Lunch Program, School Year 2022-23

State/Territory	Total number of charter schools	Participates in the National School Lunch Program: Number	Participates in the National School Lunch Program: Percent	Does not participate in the National School Lunch Program: Number	Does not participate in the National School Lunch Program: Percent
Alabama	17	17	100	.	.
Alaska	32	13	41	19	59
Arizona	533	304	57	229	43
Arkansas	95	93	98	2	2
California	1,183	1,172	99	1	0
Colorado	260	210	81	50	19
Connecticut	21	21	100	.	.
Delaware	23	22	96	1	4
District of Columbia	125	115	92	10	8
Florida	729	617	85	112	15
Georgia	94	89	95	5	5
Guam	4
Hawaii	37	20	54	17	46
Idaho	64	33	52	31	48
Illinois	134	116	87	18	13
Indiana	115	84	73	31	27
Iowa	4	4	100	.	.
Kansas	5	5	100	.	.
Louisiana	147	147	100	.	.
Maine	11	6	55	.	.
Maryland	48	48	100	.	.
Massachusetts	76	72	95	4	5
Michigan	354	354	100	.	.

Appendix I: Additional Data by State on Charter Schools and Participation in the National School Lunch Program, School Year 2022-23

State/Territory	Total number of charter schools	Participates in the National School Lunch Program: Number	Participates in the National School Lunch Program: Percent	Does not participate in the National School Lunch Program: Number	Does not participate in the National School Lunch Program: Percent
Minnesota	278	228	82	50	18
Mississippi	8	8	100	.	.
Missouri	82	82	100	.	.
Nevada	100	100	100	.	.
New Hampshire	38	7	18	31	82
New Jersey	85	62	73	23	27
New Mexico	99	82	83	17	17
New York	342	300	88	42	12
North Carolina	200	80	40	120	60
Ohio	318	272	86	46	15
Oklahoma	48	48	100	.	.
Oregon	112	78	70	34	30
Pennsylvania	164	114	70	50	31
Puerto Rico	10	10	100	.	.
Rhode Island	40	40	100	.	.
South Carolina	80	75	94	.	.
Tennessee	114	112	98	2	2
Texas	1,032	924	90	106	10
Utah	134	99	74	35	26
Virginia	7	3	43	4	57
Washington	16	15	94	1	6
West Virginia	4	.	.	4	100
Wisconsin	182	165	91	17	9
Wyoming	5	5	100	.	.
All	7,609	6,471	85	1,112	15

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Note: Six states (Kentucky, Montana, Nebraska, North Dakota, South Dakota, and Vermont) and three territories (American Samoa, the Northern Mariana Islands, and the U.S. Virgin Islands) had no charter schools as of school year 2022-23. Guam did not report data on National School Lunch Program participation for school year 2022-23.

Table 3: Use of Special Eligibility Provisions by Charter Schools Participating in the National School Lunch Program, School Year 2022-23

State/Territory	Total number of charter schools participating	Charter schools using the Community Eligibility Provision: Number	Charter schools using the Community Eligibility Provision: Percent	Charter schools using Provision 2: Number	Charter schools using Provision 2: Percent	Charter schools participating without a provision: Number	Charter schools participating without a provision: Percent
Alabama	17	10	59	.	.	7	41
Alaska	13	4	31	.	.	9	69
Arizona	304	95	31	11	4	198	65
Arkansas	93	27	29	.	.	66	71
California	1,172	386	33	139	12	647	55
Colorado	210	8	4	.	.	202	96
Connecticut	21	21	100
Delaware	22	10	46	.	.	12	55
District of Columbia	115	92	80	.	.	23	20
Florida	617	181	29	.	.	436	71
Georgia	89	26	29	1	1	62	70
Hawaii	20	14	70	.	.	6	30
Idaho	33	3	9	.	.	30	91
Illinois	116	112	97	.	.	4	3
Indiana	84	75	89	.	.	9	11
Iowa	4	4	100
Kansas	5	1	20	.	.	4	80
Louisiana	147	103	70	.	.	44	30
Maine	6	.	.	3	50	3	50
Maryland	48	31	65	.	.	17	35
Massachusetts	72	38	53	1	1	33	46
Michigan	354	243	69	.	.	111	31
Minnesota	228	85	37	.	.	143	63
Mississippi	8	8	100
Missouri	82	10	12	.	.	72	88
Nevada	100	26	26	.	.	74	74
New Hampshire	7	7	100
New Jersey	62	14	23	.	.	48	77
New Mexico	82	45	55	.	.	37	45
New York	300	228	76	30	10	42	14
North Carolina	80	80	100
Ohio	272	226	83	5	2	41	15
Oklahoma	48	2	4	7	15	39	81

Appendix I: Additional Data by State on Charter Schools and Participation in the National School Lunch Program, School Year 2022-23

State/Territory	Total number of charter schools participating	Charter schools using the Community Eligibility Provision: Number	Charter schools using the Community Eligibility Provision: Percent	Charter schools using Provision 2: Number	Charter schools using Provision 2: Percent	Charter schools participating without a provision: Number	Charter schools participating without a provision: Percent
Oregon	78	33	42	5	6	40	51
Pennsylvania	114	90	79	.	.	24	21
Puerto Rico	10	10	100
Rhode Island	40	7	18	.	.	33	83
South Carolina	75	15	20	.	.	60	80
Tennessee	112	97	87	2	2	13	12
Texas	924	532	58	22	2	370	40
Utah	99	4	4	3	3	92	93
Virginia	3	2	67	.	.	1	33
Washington	15	5	33	.	.	10	67
Wisconsin	165	59	36	.	.	106	64
Wyoming	5	1	20	.	.	4	80
All	6,471	2,948	46	229	4	3,294	51

Source: GAO analysis of the Department of Education’s Common Core of Data. | GAO-25-106846

Note: Both the Community Eligibility Provision (CEP) and Provision 2 reduce administrative work for schools and expand access to school meals. CEP allows schools, groups of schools, or school districts in high-poverty areas to offer no-cost meals to all enrolled students. Provision 2 allows schools to determine student eligibility once every 4 years instead of yearly using household applications. Six states (Kentucky, Montana, Nebraska, North Dakota, South Dakota, and Vermont) and three territories (American Samoa, the Northern Mariana Islands, and the U.S. Virgin Islands) had no charter schools as of school year 2022-23. In school year 2022-23, West Virginia had no charter schools that participated in the National School Lunch Program. Guam did not report data on National School Lunch Program participation for school year 2022-23.

Appendix I: Additional Data by State on Charter Schools and Participation in the National School Lunch Program, School Year 2022-23

Table 4: Free or Reduced-Price Lunch (FRPL) Eligibility for Students Attending Charter Schools that Did or Did Not Participate in the National School Lunch Program, School Year 2022-23

State/Territory	Total number of students	Percent of students eligible for FRPL	Participating schools: Total students	Participating schools: Students eligible for FRPL	Participating schools: Percent	Non-participating schools: Total students	Non-participating schools: Students eligible for FRPL	Non-participating schools: Percent
Alabama	5,748	73	5,748	4,216	73	.	.	.
Alaska	8,370	12	2,014	914	45	6,356	57	1
Arizona	204,559	31	115,715	62,972	54	88,844	.	.
Arkansas	34,381	61	34,278	20,980	61	103	.	.
California	553,110	64	551,322	353,711	64	195	85	44
Colorado	126,434	32	100,936	40,790	40	25,498	.	.
Connecticut	10,897	68	10,897	7,378	68	.	.	.
Delaware	18,222	23	17,638	4,066	23	584	45	8
District of Columbia	40,740	54	38,310	20,986	55	2,430	1,195	49
Florida	373,152	47	340,772	170,017	50	32,380	5,299	16
Georgia	54,231	53	51,794	28,917	56	2,437	15	1
Guam
Hawaii	12,128	45	6,587	3,713	56	5,541	1,683	30
Idaho	23,311	20	13,791	4,626	34	9,520	.	.
Illinois	60,125	.	53,042	.	.	7,083	.	.
Indiana	42,652	72	34,070	26,956	79	8,582	3,841	45
Iowa	257	28	257	72	28	.	.	.
Kansas	399	63	399	252	63	.	.	.
Louisiana	88,441	70	88,441	61,808	70	.	.	.
Maine	1,822	34	834	405	49	.	.	.
Maryland	23,974	59	23,974	14,140	59	.	.	.
Massachusetts	48,115	57	45,814	27,627	60	2,301	.	.
Michigan	128,272	79	128,272	101,483	79	.	.	.
Minnesota	61,994	62	56,242	35,920	64	5,752	2,257	39
Mississippi	3,245	100	3,245	3,245	100	.	.	.
Missouri	25,304	81	25,304	20,441	81	.	.	.
Nevada	68,693	46	68,693	31,685	46	.	.	.
New Hampshire	4,917	18	964	245	25	3,953	660	17
New Jersey	58,566	69	46,408	31,836	69	12,158	8,395	69
New Mexico	28,296	63	23,363	16,411	70	4,933	1,318	27
New York	175,743	72	154,925	126,049	81	20,818	.	.
North Carolina	131,609	25	51,211	32,854	64	80,398	.	.
Ohio	81,868	53	73,133	43,016	59	8,735	138	2

Appendix I: Additional Data by State on Charter Schools and Participation in the National School Lunch Program, School Year 2022-23

State/Territory	Total number of students	Percent of students eligible for FRPL	Participating schools: Total students	Participating schools: Students eligible for FRPL	Participating schools: Percent	Non-participating schools: Total students	Non-participating schools: Students eligible for FRPL	Non-participating schools: Percent
Oklahoma	16,095	28	16,095	4,456	28	.	.	.
Oregon	25,866	35	18,716	9,133	49	7,150	.	.
Pennsylvania	104,265	60	75,931	62,300	82	28,334	.	.
Puerto Rico	2,849	91	2,849	2,593	91	.	.	.
Rhode Island	11,902	68	11,902	8,130	68	.	.	.
South Carolina	34,173	45	31,049	15,166	49	.	.	.
Tennessee	44,401	52	43,831	22,868	52	570	204	36
Texas	455,990	72	434,541	329,209	76	21,449	.	.
Utah	73,797	28	60,144	18,996	32	13,653	1,582	12
Virginia	1,252	47	871	586	67	381	3	1
Washington	4,778	59	4,709	2,761	59	69	33	48
West Virginia	1,242	38	.	.	.	1,242	474	38
Wisconsin	36,594	56	34,831	20,286	58	1,763	328	19
Wyoming	676	35	676	239	35	.	.	.
All	3,313,455	55	2,904,538	1,794,454	62	403,212	27,612	7

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Note: Six states (Kentucky, Montana, Nebraska, North Dakota, South Dakota, and Vermont) and three territories (American Samoa, the Northern Mariana Islands, and the U.S. Virgin Islands) had no charter schools as of school year 2022-23. Three states (California, Maine, and South Carolina) had students whose free or reduced-price lunch eligibility was missing or not reported.

Appendix II: Selected State Profiles

This appendix provides additional information on the four selected states, and some observations by the selected charter schools in each state (see table 5).¹ The profiles on the following pages are based on information from state agencies, the Food Research and Action Center, and the National Association of Charter School Authorizers; state policies; Department of Education information and Common Core of Data; and interviews with charter school officials. We shared relevant portions of the profiles with state and charter school officials to verify the information.

Table 5: Summary of Selected States and Charter Schools Interviewed

State	Total number of charter schools interviewed	School type (number)	Participate in school meal programs (number)	Do not participate in school meal programs (number)
California	4	<ul style="list-style-type: none"> • 3 independent • 1 CMO 	4	0
Florida	4	<ul style="list-style-type: none"> • 1 independent • 3 CMO 	3	1
New Mexico	5	<ul style="list-style-type: none"> • 5 independent • 0 CMO 	4	1
Ohio	3	<ul style="list-style-type: none"> • 0 independent • 3 CMO 	3	0

Source: GAO summary of charter school information, interviews with charter school officials, and Department of Education's Common Core of Data. | GAO-25-106846

Note: CMO refers to a charter management organization, which is a nonprofit organization that operates or manages a network of schools linked by centralized support, operations, and oversight.

¹Charter school refers to non-virtual charter schools—public schools governed by a contract (or charter) and authorized under state law—where most instruction is conducted in person. Virtual charter schools are public charter schools that operate entirely or mostly online.



Appendix II

California

Charter schools at a glance

Since school year 2018-19, both the number of charter schools and the number of students have declined.

Year of charter school law: 1992

Charter school authorizers:
local school districts

In school year 2022-23:

- **Number of schools** - 1,183
- **Percentage of all schools in the state** - 12%
- **School location** - 55% urban; 30% suburban; 16% rural*
- **Student enrollment** - 553,110
- **Percentage eligible for free or reduced-price lunch** - 64%

*Does not sum to 100% due to rounding

State school meal policies

In 2018, California required charter schools to offer eligible students one nutritionally adequate meal, but did not require schools participate in school meal programs.

This policy was replaced in school year 2022-23 by a **universal school meals program, which requires charter schools, among others, to provide breakfast and lunch at no cost to all students and to maximize federal funds.** Schools must participate in school meal programs to receive state supplemental funds.

One benefit of the Universal Meals Program is that it supports equity.
– Charter school official

The Universal Meals Program is the primary reason our school's food service program is no longer running at a deficit. – Charter school official

Overview of charter school meal program participation

The California Department of Education oversees school meal programs.

Charter School Participation in the National School Lunch Program (school year 2022-23)

	Number of charter schools	Percentage of schools
Reported participating	1172	99%
Reported not participating	1	0%
Not reported	10	1%
Total	1183	100%

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Observations from selected charter schools

We spoke with officials from four charter schools who discussed their experiences with facilities and changing student populations.

- **Locating in district buildings.** Two charter schools are in traditional school district buildings.

Our two sites are co-located with the local district's schools under two different agreements. One building was available due to low district school enrollment, and the second building is leased under a state policy; however, we do not share kitchen or storage facilities at either location. – Charter school official

- **Outdoor space.** All four schools use outdoor space as an eating area; two of the schools only have outdoor eating space.



Source: GAO.

Bees can be an issue because students eat outside, so our students helped set up a bee friendly garden. – Charter school official

- **Ordering meals.** All four schools had difficulty determining how many meals to order for several reasons, including increased student participation.

The difficulty with ordering meals has led to food waste and increased costs to the school. – Charter school official

Sources: GAO interviews with California Department of Education and select charter school officials, analysis of state documents, National Association of Charter School Authorizers, the Department of Education information and Common Core of Data. | GAO-25-106846



Appendix II

Florida

Charter schools at a glance

Since school year 2018-19, both the number of charter schools and the number of students has increased.

Year of charter school law: 1996

Charter school authorizers: local school districts, a college or university

In school year 2022-23:

- **Number of schools** - 729
- **Percentage of all schools in the state** - 18%
- **School location** - 32% urban; 53% suburban; 15% rural
- **Student enrollment** - 373,152
- **Percentage eligible for free or reduced-price lunch** - 47%

State school meal policies

As of 2023, Florida does not have any school meal policies specifically for charter schools.

Florida requires public schools serving kindergarten to grade 5 to participate in the School Breakfast Program using state funding to supplement the costs for schools. Also each public elementary, middle, or high school with 80 percent or more students eligible for free or reduced-price lunch must offer all enrolled students breakfast at no cost. State officials said this policy applies only to charter schools that are part of a school district's school food authority.

All schools in our network provide universal free breakfast because it's financially viable to do so.
 – Charter school official

Overview of charter school meal program participation

The Florida Department of Agriculture and Consumer Services oversees school meal programs.

Charter School Participation in the National School Lunch Program (school year 2022-23)

	Number of charter schools	Percentage of schools
Reported participating	617	85%
Reported not participating	112	15%
Not reported	0	0%
Total	729	100%

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Observations from selected charter schools

We spoke with officials from four schools— one independently run, and three that are part of a charter management organization (CMO). One school did not participate in school meal programs.

- **Benefit of school meals.** One school official said their CMO has developed a culture around the importance of school meals.
Our organization's first cafeteria manager helped create a culture that emphasized the importance of food services, especially to the principals. She is now in her 80s, and in an advisory role, but she continues to meet with each new staff and principal. – CMO official
- **Funding.** All three schools participating in school meal programs noted issues with either the funding structure or funding amounts.
- **Relationship with local school district.** All four schools mentioned mixed relationships with the local district, with some districts providing food services to charter schools.
We cannot provide meals to students without participating in an existing program operated by a local school district that uses the Community Eligibility Provision or by operating the program ourselves.
 – Official at a charter school that does not participate in school meal programs
- **Use of commercial vendors.** Three schools previously tried to provide meals using commercial vendors, such as local restaurants.
Initially we used a restaurant located nearby but had challenges with the restaurant being able to meet all of the program requirements. – Charter school official

Sources: GAO interviews with Florida Department of Agriculture and Consumer Services and select charter school officials, Fla. Stat. § 595.405, Food Research and Action Center and National Association of Charter School Authorizers documents, and the Department of Education information and Common Core of Data. | GAO-25-106846



Appendix II

New Mexico

Charter schools at a glance

Since school year 2018-19, both the number of charter schools and the number of students has increased.

Year of charter school law: 1993

Charter school authorizers: the state or local school districts

In school year 2022-23:

- Number of schools - 99
- Percentage of all schools in the state - 11%
- School location - 56% urban; 12% suburban; 32% rural
- Student enrollment - 28,296
- Percentage eligible for free or reduced-price lunch - 63%

State school meal policies

As of 2023, New Mexico does not have any school meal policies specifically for charter schools.

In March 2023, New Mexico enacted a law, which requires schools to provide access to free and healthy school meals to all students. The law states that the requirement applies to certain schools, including charter schools, that already participate in school meal programs.

The universal school meals program helps more students get fed, it supports farmers, and students get healthier foods.
– Charter school official

State funds provided under universal school meals offset our decline in revenue, preventing our meal program from operating at a loss. – Charter school official

Overview of charter school meal program participation

The New Mexico Public Education Department oversees school meal programs.

Charter School Participation in the National School Lunch Program (school year 2022-23)

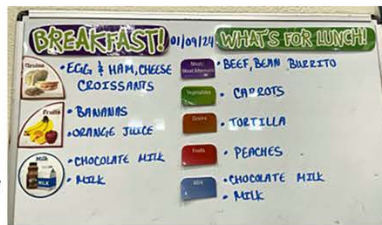
	Number of charter schools	Percentage of schools
Reported participating	82	83%
Reported not participating	17	17%
Not reported	0	0%
Total	99	100%

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846

Observations from selected charter schools

We spoke with officials from four participating charter schools who discussed their experiences incorporating different foods in their menus and with vendors.

- **Culturally relevant foods.** The state's universal school meals program encourages schools to provide culturally relevant foods.



Source: GAO.

- **Indigenous foods.** As of school year 2023-24, New Mexico had 17 charter schools (serving about 1,500 students) that are historically defined as "Indian impacted school districts." To be considered such, these districts and schools must meet criteria set by the state.

When I worked for the Navajo Nation, the students were very excited when they were able to eat atole, a corn porridge, at lunch. – Charter school official

- **Vendor options.** Two schools previously used commercial vendors, such as food banks and restaurants, to serve meals.

Before participating in school meal programs, we contracted with a local restaurant, including a food truck parked on our campus, which sold food a la carte and reduced-price lunches to students who qualified. – Charter school official

Sources: GAO interviews with New Mexico Public Education Department and select charter school officials, analysis of state documents, Food Research and Action Center and National Association of Charter School Authorizers documents, 2023 N.M. Laws, ch. 30, §§ 1-6, and the Department of Education information and Common Core of Data. | GAO-25-106846



Appendix II

Ohio

Charter schools at a glance

Since school year 2018-19, both the number of charter schools and the number of students has increased.

Year of charter school law: 1997

Charter school authorizers: the state, local school districts, nonprofits, a college or university

In school year 2022-23:

- Number of schools - 318
- Percentage of all schools in the state - 9%
- School location - 76% urban; 18% suburban; 6% rural
- Student enrollment - 81,868
- Percentage eligible for free or reduced-price lunch - 53%

State school meal policies

- Ohio requires that charter schools with at least 20 percent of students eligible for free breakfast to operate the School Breakfast Program and with at least 20 percent of students eligible for free lunch to operate the National School Lunch Program, if financially possible.
- Beginning in school year 2023-24, traditional and charter schools participating in school meal programs are required to provide no-cost meals to students eligible for reduced-price meals. The state provides supplemental reimbursement to these schools.
- According to state officials, charter schools must either be their own school food authority or participate with a local school district.

Overview of charter school meal program participation

The Ohio Department of Education and Workforce oversees school meal programs.

Charter School Participation in the National School Lunch Program (school year 2022-23)

	Number of charter schools	Percentage of schools
Reported participating	272	86%
Reported not participating	46	15%
Not reported	0	0%
Total	318	101%

Source: GAO analysis of the Department of Education's Common Core of Data. | GAO-25-106846
 Note: Percentage does not sum to 100 due to rounding.

Observations from selected charter schools

We spoke with officials from three charter schools—each are part of charter management organizations. They discussed their experiences with post pandemic operations and providing food for students.

- **Post-pandemic operations.** Officials from three schools said that it has taken time to adjust to operating school meal programs without pandemic-related waivers.

The pandemic-era waivers reduced our administrative burden, particularly not having to ensure that all meals met meal pattern requirements. Further, more students ate school meals when there were waivers for providing free meals to all students. Since the waivers ended, fewer students are eating school meals because their families cannot afford them. – Charter school official

- **Providing meals.** One school uses vendors, and one prepares meals from scratch. The third school prepares meals from scratch and serves as a vendor for other charter schools.

Our previous vendor abruptly stopped participating in school meal programs, which was particularly hard for some of our larger schools in Columbus. – Charter school official

The funds from vending meals to other charter schools help support other services we offer, such as a community produce market. – Charter school official

- **Supplemental food offerings.** In addition to school meal programs, one school operated a community produce market and food pantry.

Sometimes, the food pantry and the community market are drivers for students to enroll at our school. There are a lot of students who come to school to get food. – Charter school official

Sources: GAO interviews with Ohio Department of Education and Workforce and select charter school officials, Ohio Rev. Code Ann. § 3314.18, analysis of state documents, National Association of Charter School Authorizers, and the Department of Education information and Common Core of Data. | GAO-25-106846

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Kathryn Larin, (202) 512-7215 or larink@gao.gov

Staff Acknowledgments

In addition to the contact named above, Theresa Lo (Assistant Director), Swati Deo (Analyst in Charge), Emma O'Shea and Ryan Rudolph made key contributions to this report. James Bennett, Katherine McElroy, Jean McSween, John Mingus, Jessica Orr, Vernetta G. Shaw, and William Stupski also contributed to this report.

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