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Global Food for Education Initiative Faces Challenges for Successful Implementation

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Abbreviations

CCC	Commodity Credit Corporation
CSSD	Consultative Sub-Committee on Surplus Disposal
FAO	Food and Agriculture Organization of the United Nations
FAPC	Food Assistance Policy Council
FAS	Foreign Agricultural Service
FNS	Food and Nutrition Service
GFEI	Global Food for Education Initiative
IFPRI	International Food Policy Research Institute
IQ	Intelligence quotient
ITSH	internal transportation, storage, and handling
LDC	least developed country
MCH	Maternal and child health
NA	not available
NFDM	nonfat dry milk
PSP	parent school partnership
PTA	parent-teacher association
PVO	private voluntary organization
SFP	school feeding program
UMR	Usual Marketing Requirements
U.N.	United Nations
UNICEF	United Nations Children's Fund
UNESCO	United Nations Educational, Scientific, and Cultural Organization
USAID	U.S. Agency for International Development
USDA	U.S. Department of Agriculture
VAM	vulnerability analysis and mapping unit
WFP	World Food Program
WHO	World Health Organization

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

February 28, 2002

The Honorable Tom Harkin
Chairman
The Honorable Richard G. Lugar
Ranking Minority Member
Committee on Agriculture, Nutrition and Forestry
United States Senate

The Honorable Richard J. Durbin
The Honorable Patrick Leahy
United States Senate

The Honorable Larry Combest
Chairman
The Honorable Charles W. Stenholm
Ranking Minority Member
Committee on Agriculture
House of Representatives

At the July 2000 Group of Eight industrialized countries' summit in Okinawa, Japan, President Clinton proposed a Global Food for Education Initiative (GFEI) whereby developed countries would provide school breakfasts or lunches to needy children in poor countries. The overall goal of the initiative is to contribute to universal education for all by using school meals to attract children to school, keep them attending once they enroll, and improve learning. An estimated 300 million children in developing countries are chronically undernourished, and many of them are among an estimated 120 million who do not now attend school. At the same time, the president announced a 1-year, $300-million pilot food for education program to be administered by the U.S. Department of Agriculture (USDA)[1] to jump-start the proposed global effort. The pilot's objectives are to use school meals to improve student enrollment, attendance, and performance. Under the program, the United States is using the authority of section 416(b) of the Agricultural Act of 1949 to donate surplus agricultural commodities from the Commodity Credit

[1]USDA's Foreign Agricultural Service has overall responsibility for managing the pilot program.

Corporation's (CCC)[2] inventory for use in existing as well as new and expanded school feeding and preschool nutrition projects in developing countries. Congress is currently considering whether to provide additional funding for the pilot program and/or establish a permanent program.[3]

As you requested, we examined (1) lessons that can be drawn from existing research and expert views on the effectiveness and cost of school feeding programs in promoting increased school enrollment, attendance, and performance; (2) the extent to which the U.S. pilot program has built upon these lessons to date; (3) whether the U.S. pilot program is being operated and managed so as to reasonably ensure that the food aid and monetized proceeds are effectively and efficiently used; and (4) the views of other major donors regarding support for a comprehensive, long-term global food for education[4] initiative.

As you also requested, we are providing our analysis in advance of the pilot program's completion. The first meals of the pilot were not delivered until fall 2001, and USDA expects the program to carry over into 2003. As a result, our observations on the pilot program concern its design and implementation through December 2001 and do not assess the in-country phase of the program. To address the issues outlined above we met with and reviewed information from U.S. government officials at the Departments of Agriculture and State, as well as the U.S. Agency for International Development (USAID), the Office of Management and Budget, and the White House. We also gathered information from and met with officials of the U.N. World Food Program (WFP), some private

[2]CCC, a funding mechanism for U.S. farm income support and disaster assistance programs, has no staff. Its activities, including acquisition, storage, and disposition of surplus commodities, are carried out primarily by personnel of USDA's Farm Service Agency.

[3]H.R. 1700, McGovern-Dole International Food for Education and Child Nutrition Act of 2001, was introduced in the House of Representatives on May 3, 2001. S. 1036, which has the same title, was introduced in the U.S. Senate on June 13, 2001. The House and the Senate are currently considering whether to incorporate versions of the proposed legislation in the new multi-year farm bill.

[4]The term "food for education" refers to a school feeding program that includes the specific objectives of improving school enrollment, attendance, and/or performance or learning. The term "school feeding" may refer to a program in which the only objective is to provide food to children or to a program that also seeks improvements in school enrollment, attendance, and/or performance.

voluntary organizations, foreign donor governments, the European Commission, the World Bank, and private research institutions. Appendix I provides detailed information on our scope and methodology.

Results in Brief

Research and expert views on the effectiveness of school feeding programs indicate that the programs are more likely to have positive results when they are carefully targeted and integrated with other educational, health, and nutritional interventions. To be effective, programs need to be targeted at relatively poor areas where enrollment and attendance rates are low and where the value of the food is a sufficient incentive to attract children to school. However, actual learning requires a facilitative environment that includes enough adequately trained teachers, good texts and other learning materials, and adequate physical facilities. Other important factors that contribute to the effectiveness of school feeding programs include interventions that focus on micronutrient[5] deficiencies and clean water and sanitation facilities. At the same time, school feeding programs are costly in terms of both the dollars required to fund them and the human resources needed to operate them. As a result, school feeding programs may not be cost effective when compared with alternative interventions such as providing quality teaching and offering nutritional and health packages directed at pregnant women and at mothers with their preschool children.

In designing and setting up the pilot program, USDA did not build on some important lessons from previous school feeding programs. For example, when USDA solicited proposals for the program, it did not require information on several important factors linked to effective food for education projects—although in some cases the sponsors supplied some of this information anyway. USDA asked private voluntary organizations—but not WFP—for specific information on whether their proposed projects targeted the right communities or populations, but only to a limited extent. Information on many other key contributors to success, such as whether schools had good learning environments and safe and adequate on-site water and sanitation facilities, was not required of either the Private Voluntary Organizations (PVO) or WFP, in part because of the program's quick start-up and short duration, as well as concerns that costly information requirements might discourage potential sponsors from

[5]A micronutrient is an organic compound (such as a vitamin or mineral) essential in minute amounts to human growth and welfare.

applying. Further, the written criteria for evaluating proposals did not focus on many of these factors. In addition, USDA provided little funding for these and other nonmeal components of school feeding programs, which are essential elements in effective food for education projects.

While USDA expects more than 8 million children to benefit from the pilot program, we found that the pilot's structure, planning, and management thus far do not reasonably ensure that the program's objectives of increasing enrollment, attendance, and learning will be attained. The administration's decision to use surplus commodities to fund the program was an expedient way to get it started quickly but may not be sustainable. The selection of USDA to manage the program raises concerns because USDA does not have the experience and resources for managing food for education development programs. USDA officials told us they were under pressure to get the program up and running, had little time for planning and consideration of the human capital necessary to run the pilot successfully, and had insufficient resources to fully address the educational components of school feeding. In addition, USDA initiated the pilot without a fully developed strategy for monitoring and evaluating performance; and, because of the pilot's short duration, USDA says it will not be able to monitor and evaluate one of the program's three objectives—improvements in learning. WFP only recently completed collection of relevant baseline data on enrollment and attendance, and USDA is still in the process of collecting such information. Other weaknesses in project performance data and financial accountability may make it difficult to draw clear conclusions about the pilot's effectiveness when the program is completed.

Representatives of most other donor countries that we interviewed[6] indicated their governments were either noncommittal about—or unwilling to provide—substantial support for a comprehensive, long-term food for education program. This lack of support is problematic because the United States envisioned a multilateral program with other donors funding about three-quarters of the program's total cost. The European Commission and several other nations are generally opposed to using food aid for development, saying sustainable development assistance requires

[6]We interviewed representatives of the European Union, Australia, Canada, Denmark, Finland, France, Germany, Japan, the Netherlands, Sweden, and the United Kingdom.

programs that are integrated across a variety of sectors. Several donor country representatives said the pilot program seems principally designed to dispose of surplus commodities and questioned the sustainability of a program that depends on agricultural surpluses. Overall, GFEI seems unlikely to attract much support from other donors unless the United States adopts a permanent program that is not dependent on surplus agricultural commodities and/or unless the pilot program demonstrates strong, positive results.

In this report, we provide matters that the Congress may wish to consider as it contemplates legislation on a food for education program.

USDA, in commenting on a draft of this report, said it believes we took an overly critical view of how it administered the pilot program given time and resource constraints. The Office of Management and Budget, the Department of State, and USAID indicated the report's findings are essentially accurate. USAID endorsed our matters for congressional consideration. We also received technical comments on portions of the report from the WFP, six PVOs,[7] and the World Bank and incorporated changes as appropriate.

Background

At Jomtien, Thailand, in March 1990, representatives of the global education community held the "World Conference on Education for All" and adopted a declaration on universal access to education as a fundamental right of all people. In April 2000, the "World Education Forum"[8] met in Dakar, Senegal. Delegates from 181 nations adopted a framework for action committing their governments to achieve quality basic education for all—including ensuring that by 2015, all children—especially girls, children in difficult circumstances, and those from ethnic minorities—have access to completely free primary education of good quality.

[7]All 13 PVOs participating in the program were invited to comment. Comments were received from ACDI/VOCA, Catholic Relief Services (CRS), International Partnership for Human Development (IPHD), Land O'Lakes (LOL), Mercy Corps International (MCI), and Mery USA (MUSA). Project Concern advised us that it had no comments.

[8]The forum is an interagency body established in 1990 by the U.N. Development Program, the U.N. Educational, Scientific, and Cultural Organization, the U.N. Population Fund, the U.N. Children's Fund, and the World Bank.

Also in early 2000, the U.S. ambassador to the U.N. Food Agencies in Rome proposed that the United States, within the U.N. framework, take the lead in organizing a worldwide school lunch program.[9] The purpose would be to provide a meal every day for every needy child in the world. Doing so, the ambassador said, would attract children to school and keep them there under conditions in which they are able to learn and grow. The United States would pay 25 percent of the cost, and other donor nations would pay the rest. The United States would benefit, since Americans produce more food than they can eat or profitably sell and since most of the U.S. contribution would be in the form of agricultural commodities and thus would strengthen the market for cereal grain, dairy products, and livestock. According to the ambassador, other farm surplus countries such as France, Canada, and Australia would benefit as well.

In late May 2000, President Clinton met with the ambassador to discuss the idea and asked senior advisers to prepare an analysis of how the United States might participate. In early July 2000, the advisers reported that all relevant agencies recommended that the president announce a U.S. pilot program to support the international community's goal of achieving universal access to basic education by 2015 and the U.N.'s 10-year "Girls' Education Initiative" to help poor countries eliminate gender disparities in educational access. The advisers recommended spending approximately $300 million in the first year on the pilot program, with levels in subsequent years dependent upon factors such as the extent of international participation and the continued availability of CCC funding. At the Okinawa Summit on July 23, 2000, the president announced the Global Food for Education Initiative and the pilot program.

According to the White House press release, which was issued the day the program was announced, the purpose of the pilot program is to improve student enrollment, attendance, and performance in poor countries. These objectives were reaffirmed in USDA's September 2000 request for proposals from cooperating sponsors and, more recently, in a December 2001 paper describing the goals, scope, and framework for action for monitoring and evaluating the pilot program.

[9]George McGovern, "Too Many Children Are Hungry. Time for Lunch," the *Washington Post*, Feb. 27, 2000.

For the pilot, USDA sought proposals from various potential implementing partners, and approved 53 projects[10] in 38 countries covering an estimated 8.3 million children. Partners include WFP[11] and various cooperating sponsors.[12] Among the latter are 13 PVOs and 1 foreign government (Dominican Republic). As of mid-December 2001, USDA had finalized agreements for 21 of 25 PVO projects, 26 of 27 WFP projects,[13] and 1 project with the Dominican Republic. The recent total estimated cost for all of the pilot projects was $227.7 million, allocated as follows: WFP projects, $92.5 million; PVO projects, $121.1 million; and the government of the Dominican Republic, $14.1 million. The total cost is $72.3 million less than the originally planned $300 million initiative.[14] According to USDA officials, the balance will be used in fiscal year 2002 to expand existing projects that show the most potential, based on performance. Appendix II provides more detailed program and cost information.

[10]An interagency committee, chaired by USDA, evaluated the proposals and selected the winners.

[11]WFP has been doing school feeding projects for nearly 40 years. Since 1995, WFP has tried to focus the objectives of its school feeding projects on attaining educational objectives, including increased enrollment and attendance (especially for girls) and improved cognitive functions. (See app. III for additional background information on WFP.)

[12]Under USDA's 416(b) program, a cooperating sponsor may be either (1) a foreign government; (2) an entity registered with USAID in accordance with its regulations; or (3) an entity that demonstrates to CCC's satisfaction that it has the organizational experience and resources to implement and manage the type of program proposed, has experience working in the targeted country, and has experienced and knowledgeable personnel who will be responsible for implementing and managing the program. WFP is not a cooperating sponsor. CCC has a separate umbrella agreement with WFP that governs U.S. Section 416(b) donations to WFP.

[13]Some of the WFP projects involve multiple agreements.

[14]In early January 2001 initial cost estimates for the projects totaled about $289 million. According to USDA officials, implementing partners tended to overestimate project costs. According to WFP (1) commodity prices fell between the time proposals were submitted and when the agreements were negotiated and signed; (2) not all requested commodities were available and substitutions were made at lower cost; and (3) because of long delays between when proposals were submitted and projects approved and commodities shipped, many projects had to alter and/or reduce the originally requested tonnage.

Lessons Learned from School Feeding Programs Define Conditions for Likely Success

Research and expert views on school feeding programs indicate that these programs are more likely to have positive results when they are carefully targeted and integrated with other educational, health, and nutritional interventions. There is considerable evidence that school feeding programs can increase enrollment and attendance if the programs are targeted at the right communities or populations. Evidence of the effectiveness of school feeding programs in improving learning is somewhat more mixed, possibly because of difficulties isolating factors associated with increased learning, the quality of studies assessing such relationships, or the quality and settings of such programs. Programs are more likely to have a positive result on enrollment, attendance, and learning when they are integrated with a facilitative learning environment and appropriate health and nutritional interventions. Community participation and parental involvement also promote these objectives. Taking steps to ensure that programs will be sustainable when donor assistance is no longer available is important for ensuring long-term effectiveness. At the same time, school feeding programs are costly and may not be cost effective, relative to other possible interventions. (Apps. IV and V provide results from selected studies on these issues.)

Targeting the Right Population Can Improve Enrollment and Attendance

Evidence indicates that school feeding programs can improve school enrollment and attendance if they target the right population. In general, studies and experts point to the importance of targeting programs on low-income communities that lack a secure supply of food and have relatively low rates of school enrollment and attendance. When school feeding programs do improve enrollment and attendance, their contribution is primarily through a transfer of income (the food) to families.[15] School feeding programs may not have much of an impact if children are staying away because the distance to school is too far to walk, parents perceive the quality of the education to be low, or children are disabled.[16] Providing

[15]The value of the food needs to offset the cost to the family of sending their children to school. Where poverty and the need for child labor are particularly high, the financial value of the school meals needs to be very significant to offset the opportunity costs of schooling. See World Food Program, *Implementation of Operational Guidelines for WFP Assistance to Education* (Rome, Italy: 1995).

[16]According to WFP, the decision to enroll a child at school and, thereafter, for the child to attend regularly is influenced by many factors, such as the direct and indirect costs of schooling, education level of parents, perceived value of education, availability of employment opportunities, and availability and quality of school facilities.

national coverage to all children is usually not cost effective. Targeting high-risk communities is preferable to targeting individual children within schools, which could lead to competition among students and parents, dilution of nutritional impact through food sharing, and insufficient community support. (See app. IV for results from selected studies on the use of targeting to improve the effectiveness of school feeding programs.)

According to several experts and practitioners, school feeding programs can also help reduce the educational gender gap—where the proportion of school-age boys attending school significantly exceeds that for school-age girls. Many studies have shown that the inability of households to cover direct and indirect costs of education results in fewer girls attending school. This inequity exists partly because parents perceive less value in educating girls, there is greater demand for girls' labor at home, and girls are more affected by issues of school location and security. Yet some of the highest returns to education and other development investments derive from girls' education. For example, according to studies cited by WFP:

- Illiterate girls have an average of six children each while girls who go to school average 2.9 children;
- Infants born to mothers with no formal education are twice as likely to die before their first birthday than are babies born to mothers with a post-primary school education;
- Between 1970 and 1995, 44 percent of the decrease in child malnutrition was attributable to improvements in female education; and
- Educated mothers are more likely to send their own daughters to school.[17]

To increase educational opportunities for girls, a "package" of strategies is often tailored to meet a country's special needs. These packages typically contain some combination of interventions to (1) reduce the opportunity costs of sending girls to school; (2) improve the quality and relevance of education; (3) increase access to close, safe schools equipped with basic infrastructure; (4) educate parents and communities about the benefits of girls' education; and (5) establish supportive national policies.

[17]WFP, *School Feeding Works for Girls' Education* (Rome, Italy, 2001).

Facilitative Environment Needed for Effective Learning

A group of experts and practitioners who convened at USAID headquarters in October 2000[18] concluded that little learning is likely to occur without a facilitative learning environment, where teachers engage children in stimulating learning tasks, provide frequent feedback and encouragement, and are equipped with motivational textbooks and other learning materials.[19] A facilitative learning environment also requires a suitable physical environment and minimal school supplies. Unfortunately, most schooling in the developing world is far from this kind of environment.[20] Teaching is frequently of poor quality and is poorly supported; and the curriculum often has little relevance to rural life, making formal schooling unconnected with the needs of rural communities. Thus, most developing countries require investments in teacher training; basic supplies (books, blackboards, desks, and chairs); a suitable physical environment; and other learning materials. Furthermore, many school systems in developing countries are dysfunctional, characterized by dispersed or displaced populations (as a result of conflict or natural calamities), limited basic infrastructure, and endemic child malnutrition.[21] Many experts and practitioners also conclude that food for education programs must take place within the context of broad, national education reform programs that focus on essential inputs to education and learning, such as teacher development, curriculum reform, and student assessment.[22] (See app. IV for results from selected studies on the impacts that school feeding programs have on learning.)

[18]School Feeding/Food for Education Stakeholders' Meeting, Oct. 3, 2000.

[19]Several reviewers have noted uncertainties about the impact of school feeding on learning; yet they have concluded there is evidence that school feeding can positively affect learning by offsetting the effects of short-term hunger. For example, WFP, the United Nations Educational, Scientific, and Cultural Organization (UNESCO), and the World Health Organization (WHO) find that the existing literature on school feeding programs' effects on learning is not fully conclusive, but they attribute this to weaknesses in the design of studies, difficulty in obtaining certain types of information, and other factors. See WFP, UNESCO, and WHO, *School Feeding Handbook*, (Rome, Italy: 1999).

[20]Statement of Beryl Levinger before the Committee on Agriculture, Nutrition, and Forestry, U.S. Senate, July 27, 2000.

[21]One consequence of these factors is that children often attend school irregularly because the demand for labor from school-age children, their poor health, the difficulties associated with getting to school, and the limited benefits accrued from being at school conspire to reduce demand for schooling. See World Bank, *Effective Schooling in Rural Africa*, *Project Reports* (Basic Education Cluster, World Bank, 2000).

[22]School Feeding/Food for Education Stakeholders' Meeting, Oct. 3, 2000.

Nutritional and Health Measures Are Needed for Effective Programs

According to various studies,[23] poor nutrition and health among schoolchildren contribute to diminished cognitive abilities that lead to reduced school performance. According to experts, school feeding programs can be effective in reducing short-term hunger[24]—which in turn can improve learning capacity—by providing an inexpensive breakfast or small snack, shortly after students arrive at school. Meanwhile, using enriched foods or complementing commodities in school feeding programs with locally available vitamin and mineral-rich foods is an effective route to alleviating the complex micronutrient deficiencies that schoolchildren in developing countries often suffer. At the same time, school feeding programs designed to capture both nutritional and educational gains need to invest in adequate water and sanitation at schools, since poor water and sanitation give rise to infectious diseases, including parasites, which adversely affect schoolchildren's enrollment, attendance, and learning. These programs also benefit from inclusion of deworming treatments and health and nutrition education. (See app. IV for results from selected studies on nutrition and health measures that can be used in combination with school feeding programs to improve school performance.)

Community and Parental Involvement Also Can Contribute to Enrollment, Attendance, and Learning

Community and parental involvement are also important to successful school feeding programs. Community involvement in implementing school feeding programs[25] can increase contact, and hence communication, between parents and teachers, officials, and others; provide parents an opportunity to become more aware of what goes on at schools; help raise the value of education and the school for parents and the whole community; and motivate parents to enroll their children in school and ensure regular attendance. Parent-teacher associations (PTA) or other

[23]See Joy Miller Del Rosso, Partnership for Child Development, *School Feeding Programs: Improving Effectiveness and Increasing the Benefit to Education: A Guide for Program Managers* (Human Development Network and the World Bank: August 1999).

[24]There are several reasons why school feeding alone is unlikely to overcome chronic undernourishment or protein-energy malnutrition: (1) parents may provide less food at home, with the school meal simply replacing a home meal; (2) the school meal may not address the complex nutritional deficiencies in the children's diets; and (3) meals may be too irregular (at best, the programs are in place only during days within the school year).

[25]Community and parental involvement can include planning school feeding programs and/or preparation and distribution of meals.

outreach efforts can be used to educate parents and other community groups on issues such as the negative effects of temporary hunger on learning or the social and health benefits of educating girls.

Strong Government Commitment Boosts Effectiveness of School Feeding

According to WFP, another important ingredient in successful school feeding programs is national government commitment to the goal of "education for all." This commitment should be put into practice through policies, programs, and financial commitments within a country's means that support basic education.

Governments also need to commit to school feeding programs within the context of broad, national school reform programs, according to practitioners and experts who met at USAID in October 2000. These reforms should target essential inputs to education and learning, including teacher development, curriculum reform, and student assessment.

Cost of School Feeding Programs Affects Sustainability

While the benefits of school feeding programs are recognized, the programs are expensive both financially and in terms of the human resources required to operate them. In addition to the price of the food, costs associated with food logistics, management, and control can represent a significant financial burden for recipient country governments.[26] These costs may be difficult for national governments to absorb and thus adversely affect long-term program sustainability.

Estimates of the average cost of school feeding programs vary considerably (see app. V).[27] According to WFP, the average cost per student of its development school feeding projects in 2000 was 19 cents per day, or $34 for a 180-day school year (see app. V). Programs costing $34 per pupil per school year are substantial when compared with what many developing countries spend on education. For example, in 1997 public expenditures of 19 least-developed countries for both pre-primary and primary education

[26]The value of the food donated for consumption in a school feeding program may be less than half of the cost of the program. For example, in 1998-99, commodity donations to WFP and WFP commodity purchases accounted for 47 percent of total WFP budgetary expenditures. Nonfood costs--such as ocean freight; inland transportation, storage, and handling; direct support costs; and indirect support costs--accounted for the rest.

[27]See appendix V. A variety of factors affect costs, including differing program objectives, type of food served, and transportation costs.

averaged only $20 per pupil, according to UNESCO. Average public expenditures of five southern Asian countries were reported at $40 per pupil.

According to many experts,[28] national ministries of education in developing countries should not be encouraged to take on school feeding at the expense of other educational inputs. Few national governments are committed to school feeding programs over the long term, they said.[29] In addition, many governments and education ministries already are struggling to maintain barely functioning education systems; may not be equipped, financially or technically, to assume the additional burden of food distribution; and do not have the financial resources to sustain feeding programs after donor support is withdrawn.[30] These experts say that getting local communities involved from the beginning and giving them ownership of school feeding programs greatly increase the chances for long-term program sustainability. According to WFP, its guidelines for school feeding programs require both national governments and local communities to provide a significant amount of resources and infrastructure.

There are potential detrimental impacts if school feeding programs are not effectively implemented. For example, where adequate infrastructure is not available, increased attendance may lead to overcrowding and actually reduce educational achievement for existing students, while providing minimal benefit to new students. In some developing country circumstances, the school day is only a few hours. In such cases, time taken to prepare a meal may further limit an already inadequate period of

[28]School Feeding/Food for Education Stakeholders' Meeting, Oct. 3, 2000.

[29]The group also noted that once a school feeding program begins, it may be politically difficult to discontinue it. A World Bank official said she has seen situations where countries have taken over school feeding programs and, because of the cost, ignored more important priorities.

[30]Available data indicate it is not easy to achieve long-run, sustainable school feeding programs. For example, WFP, which has been funding school feeding programs for several decades, estimated that it has phased or closed out of programs in only 10 to 15 countries. (In 1999, WFP had school feeding projects in 55 countries.) Moreover, most of these were not clear-cut cases where a country was ready and able to take full responsibility for its program. In some cases, officials said, WFP has closed down a program only to reopen or reconsider it, based on changing circumstances.

instruction. In addition, if volunteers are not available to provide labor, teachers may be required to undertake this task at the expense of instructional time. Since school feeding is a highly visible income transfer, it may also be used for political purposes by actors in the recipient country. If school feeding programs are relatively ineffective, they may result in resources being taken away from better performing programs.

According to several experts, in particular situations, school feeding programs may not be as cost effective in promoting learning as other possible approaches, such as establishing maternal child health and early childhood development programs or providing alternative nutritional and educational interventions (see app. V).

Pilot Program Did Not Adequately Incorporate Lessons Learned

The pilot program has not provided reasonable assurance that lessons from previous school feeding and food for education programs have been integrated into approved pilot projects. Under pressure to get the pilot up and running quickly, USDA gave interested applicants little time to prepare proposals, and it did not require them to provide basic information on and analysis of various factors important to successful food for education programs. Written criteria for evaluating proposals similarly did not focus on many of these factors. Many of the proposals approved did not address key elements of successful school feeding programs. Moreover, USDA provided little funding for important nonmeal components of the food for education projects, and only a few of the approved PVO proposals indicated they had obtained other donors' support for nonmeal components.

USDA Did Not Have Sufficient Information for Its Evaluation

According to USDA officials with whom we spoke, the agency was under pressure to start a new and complex food for education program quickly and with far less funds—$300 million—than what is needed to fully address the educational components of school feeding. As a result, USDA did not solicit basic information on various factors linked to effective school feeding and food for education programs. Table 1 lists a set of questions, based on lessons learned, that USDA could have used to guide the type of information and analysis requested from implementing partners (i.e., cooperating sponsors and WFP) and, subsequently, for evaluating proposal quality. As shown in table 1, many important factors that experts cited were not addressed specifically by USDA in its formal request for proposals, and other items were only partly addressed in its request.[31] The request was made to cooperating sponsors but not to WFP. (Less information was sought from WFP because, as a USDA official told us, many projects in the WFP proposals had previously been reviewed and approved by the U.S. government as part of the process by which the WFP Executive Board approves its projects.[32]) We derived the questions from our review of lessons described in various studies and other documents on school feeding and food for education programs (see app. IV, especially tables 4 to 10. Also see app. VI for a more complete discussion of the interagency process used to evaluate, and approve proposals.)

[31]The request was made in a *Federal Register* notice on September 6, 2000.

[32]See appendix VI for additional discussion of this matter.

Table 1: Presence or Absence of Key Factors in USDA's Request for Proposals and in Written Criteria for Evaluating Proposals

Overall area of focus	Questions related to lessons learned from experience and/or study of previous school feeding and food for education programs	Did USDA request that item be addressed in proposal submissions?[a]	Was item included in written criteria for evaluating proposals?
Targeting	Is program targeted on areas/communities with relatively low school enrollment and attendance rates?	Yes[b, c]	Partly
	Is program targeted on areas/communities with relatively low rates of literacy?	Yes[b]	Partly
	Is program targeted on low-income areas?	Yes[c]	No
	Is program targeted on areas where enrollment and attendance are considerably lower for girls than boys?	Yes[b]	Partly
Learning environment	Does proposal address whether there are adequate numbers of teachers currently available and provisions to increase the number of teachers needed in response to expected rise in student enrollment and attendance?	No	No[d]
	Does proposal address whether teacher training is adequate and whether actions will be taken to provide additional training?	No[e]	No[f]
	Does proposal address whether there are adequate supplies of good textbooks and other learning materials?	No	No[f]
	Does proposal address whether classroom space, desks and chairs, lighting, and heating/cooling are adequate and, if not, actions that will be taken to improve the situation?	No	No[f]
Health and nutrition issues	Does proposal address whether intestinal parasitic infections are a problem and, if so, how to address them?	No	No
	Does proposal address whether clean water and adequate sanitation facilities are present and, if not, what will be done to address them?	No	No
	Does proposal address whether student population has serious micronutrient deficiencies and, if so, what will be done to address them?	No	No
	Does proposal address need for health and nutrition education and, if appropriate, offer to provide it?	No	No
	Does proposal specifically discuss the nutrient content of the meal that will be provided and identify how it addresses nutritional needs of the student population?	No[c]	Yes
Community and parental involvement	Does proposal address actions to involve the local community in the program?	Yes[e]	Partly
	Does proposal address actions to involve parents in the program?	Yes[e]	Partly
Government commitment	Does proposal discuss whether the national government subscribed to "education for all" goal?	Yes[c]	Partly[f]

(Continued From Previous Page)

Overall area of focus	Questions related to lessons learned from experience and/or study of previous school feeding and food for education programs	Did USDA request that item be addressed in proposal submissions?[a]	Was item included in written criteria for evaluating proposals?
	Does proposal discuss whether the national government has initiated broad, national school reform programs that focus on essential inputs to education and learning?	No	Partly[f]
Sustainability	Does proposal explain what resources, if any, national government is committing?	No[e]	No
	Does proposal explain what resources, if any, local communities are committing?	No[e]	No
	Does proposing sponsor explain why it believes program can become self-sustaining for the community and over what period of time?	No	Partly

Note: Also see discussion in appendix VI on the interagency process used to evaluate and approve proposals.

[a]USDA's requests for specific information were made only to cooperating sponsors and not to WFP.

[b]Sponsors were asked to provide, to the extent possible, information on literacy rates for the target population, and percentage of school-age children attending school (with special emphasis on school-age girls attending school).

[c]USDA said priority consideration would be given to projects in countries that have a commitment to universal free education but need assistance in the short run, and where the projects would promote significant improvements in nutrition, school enrollment, and attendance levels. USDA also said it wanted to target poor countries.

[d]USAID's written criteria asked for a review of the educational components of the proposal and their adequacy.

[e]Sponsors were asked to provide information on the impact of their proposed projects on areas such as teacher training, community infrastructure (PTAs and community groups), health and nutrition, and other potential donors.

[f]USAID's written criteria asked for a review of whether proposals addressed the host country educational policies and commitment to basic education.

Source: GAO analysis.

As table 1 indicates, USDA sought some information on how the projects would be targeted. For example, USDA indicated that it wanted to target poor countries and that it favored programs that would significantly improve enrollment and attendance. However, USDA did not require that proposals address how programs would be designed to improve educational performance, nor did it seek any information on factors that are key to whether learning could occur, such as adequate numbers of well-trained teachers and reasonable supplies of good learning materials. Similarly, USDA asked requesters how their programs would affect health and nutrition but did not specifically ask whether the schools had safe water and adequate sanitation facilities and whether intestinal parasitic infections in the student population were likely to be a problem. A USDA

official told us there were limits on how much information the agency could require, given the short amount of time sponsors had to prepare proposals and the 1-year duration of the pilot. Further, the agency did not want to make the information requirements so costly for sponsors that it would get few or no proposals, the official said.

Regarding the criteria used to evaluate the programs, table 1 also shows that U.S. agencies' written criteria did not specifically address most of the key factors we derived, based on our review of lessons from previous school feeding and food for education programs. Of the 20 questions in table 1 on key factors in effective school feeding and food for education programs, 1 question was addressed specifically in the agencies' written criteria and 8 were partly addressed. None of the agencies' criteria specifically addressed the four learning environment questions shown in table 1. See appendix VI for a discussion of the written criteria used by agencies in evaluating the proposals.

Some PVO and WFP Proposals Included Additional Information on Key Factors

We also reviewed the approved PVO and WFP proposals and found that many included information related to the key factors we identified as important to successful food for education programs, although fewer than a third of the approved PVO and WFP proposals discussed most of the items. In general, the response rate was highest for those factors where USDA had solicited information.

Table 2 shows the number of approved PVO and WFP proposals that provided information related to the key factors irrespective of whether USDA requested this information. For example, a considerable number of the PVO and WFP proposals included information on certain health and nutrition issues that were not specifically requested by USDA. To a lesser extent, proposals also included information on factors associated with the learning environment. Overall, the highest response rates were mostly for factors for which USDA had sought information (i.e., school enrollment and attendance levels, literacy rates, target area based on low economic status, and programs that involve the community and parents.) (See app. VI for additional discussion about the information that was included in WFP proposals.)

Table 2: Number of Approved PVO and WFP Proposals that Addressed Various Key Factors

Overall area of focus	Questions related to key factors	Number of PVO proposals addressing question (total approved proposals = 25)	Number of WFP proposalsa addressing question (total approved proposals = 26[b])
Targeting	Is school feeding program (SFP) need in the target area based on low school enrollment or attendance levels?	19	24
	What are the country's literacy rates?	10	9
	What are the target population's literacy rates?	4	6
	Is SFP need in the target area based on low economic status?	22	25
	Figures on percent of girls attending schools in the country or in the target population	7	11[c]
Learning environment	Is current educational experience adequate regarding qualified teachers?	3	10
	Is current educational experience adequate regarding student-to-teacher ratio?	4	4
	Is current educational experience adequate regarding teacher training?	5	8
	Is current educational experience adequate regarding textbooks and other learning materials?	8	9
	Are classroom space, desks, and chairs adequate?	4	5
Health and nutrition issues	Do schools have safe water?	10	9
	Do schools have adequate sanitation facilities?	10	9
	Is target population likely affected by short-term hunger, chronic malnutrition, or protein/energy malnutrition?	14	18
	Is target population likely affected by micronutrient deficiencies?	6	9
Community/parental involvement	Will program involve the community or community groups?	17	16
	Will program involve parents?	16	15
Government commitment	Is national government committed to universal free education?[d]	7	6
	Is national government committed to educational reform?	7	14
Sustainability	Is national government or local community committed to eventually assuming responsibility for operating the program?	2	5

[a]WFP submitted very brief proposals to USDA that at best addressed only a few of the items. However, additional documentation was available, to U.S. officials who evaluated the proposals, at WFP's Web site for those proposals involving projects that had already been approved by WFP's Executive Board. We reviewed that documentation, as well as WFP proposals, for the purpose of this table. In its proposal submission to USDA, WFP said its selection criteria for the proposals included mainly lower-income countries with some economies in transition; countries committed to universal free education, with a special emphasis on ensuring girls' education; and countries committed to sustainable school feeding. In addition, WFP said that projects would be implemented in countries

where national governments and local authorities aim to attract children to schools in areas where enrollment rates are lowest and school meals are most likely to make a difference. (See app. VI for further discussion about WFP information provided to USDA as part of the proposal process.)

[b]USDA approved 34 WFP proposals; however, eight were for project expansions that had not yet been approved by WFP's Executive Board. Documentation on these eight proposals was not available on WFP's Web site. According to WFP officials, expansion projects closely parallel the original projects. Therefore, our analysis focused on the other 26 projects.

[c]WFP proposals for Bolivia, the Dominican Republic, El Salvador, Gambia, Kenya, and Peru give the percentage of participants in the program who are girls.

[d]When the pilot program was announced, the director of the U.S. National Economic Council said that a prerequisite for countries being selected was a commitment to universal, free education. A USDA official told us that for all the approved proposals, USDA independently verified that the national government was committed to universal free education. WFP proposals indicated the following countries were committed to universal education but did not specify whether that included a free education: Bhutan, Bolivia, Cameroon, Cote d'Ivoire, El Salvador, Ethiopia, Gambia, Honduras, Kenya, Nepal, and Tanzania.

Source: GAO analysis of proposal documentation for USDA approved proposals.

USDA Provided Little Funding for Components Identified as Important to Successful Programs

USDA provided little funding for nonmeal components—such as basic classroom materials, nutritional education, and treatment of parasitic infections—that are essential elements of an integrated approach to food for education programs. Altogether, USDA approved 60 proposals, including 34 for WFP,[33] 25 for PVOs, and 1 for the government of the Dominican Republic. For WFP projects, USDA largely funded only school meals and related costs, including storage, transportation, and handling of the food.[34] For the PVO projects, USDA was willing to consider proposals that included nonfood components to be funded by monetizing some of the surplus commodities or by the PVOs themselves.[35] We found that 17 of the 25 approved PVO proposals included nonmeal components; but of the 17 proposals, only 10 included in their proposed budget a dollar value for resources that would be allocated to some or all of these activities.[36] (See app. VII, table 14, for additional information on the extent to which PVO proposals included nonmeal components and budgeting for these activities.)

[33]The 34 proposals covered 27 projects in 23 countries (see app. II).

[34]According to WFP officials, WFP projects often include funding for nonmeal components that is obtained through donor countries, partnership arrangements with other international donors, or by recipient country governments. Table 15 in appendix VII provides information on such planned funding for the pilot program approved WFP projects that was available at WFP's Web site.

[35]According to USDA, under the section 416(b) program, WFP may also sell some of the commodities within the recipient country to provide local currency resources for in-country expenses, including, but not limited to, administrative, storage, transportation, and handling expenses, as well as direct costs of their humanitarian and developmental projects. However, WFP's general policy is not to monetize food commodities and WFP has said it does not propose to monetize food commodities to fund related educational support activities.

[36]According to ACDI/VOCA, USDA was not responsive to funding complementary activities necessary for the overall improvement of education. Such complementary activities should be funded by GFEI in the future, it said.

Weaknesses in Structure, Planning, and Management Reduce Chances for Pilot Program Success

While the U.S. pilot program expects to provide food to more than 8 million schoolchildren in developing countries, its structure, planning, and management to date do not reasonably ensure a program that will produce substantial gains in enrollment, attendance, and especially learning.[37] The administration's decision to fund the program through surplus commodities may be appropriate for a 1-year pilot but is not sustainable for a longer-term program. USDA, which was selected to manage the pilot, lacked the expertise and resources of USAID--the agency traditionally responsible for foreign development aid such as food for education programs. The pressure on USDA to get the pilot program up and running quickly did not allow time to adequately plan the program and hire additional staff to manage it. USDA launched the pilot before fully developing a strategy for monitoring and evaluating performance; and, because of the pilot's short time frame, USDA officials told us they would not be able to evaluate improvements in learning—one of the program's three objectives. This weakness, as well as others related to ensuring financial accountability for some parts of the projects, could make determining the pilot's effectiveness difficult.

Surplus Commodities Not Reliable Funding Mechanism

The administration's decision to use surplus agricultural commodities to fund the pilot was an expedient way to get the program quickly under way. However, surplus commodities are not a good vehicle for funding a medium- or long-term development program, since surpluses cannot be ensured on a regular basis.[38] (For example, between fiscal years 1996 and 1998, there was no section 416(b) program.) Although the pilot was expected to run for just over 1 year, the administration contemplated a multiyear food for education program, possibly lasting as long as a decade. Under this scenario, when surpluses were not available, the administration

[37]Although this section focuses considerably on USDA as manager of the pilot, the overall design and structure of the program was the result of an interagency process that involved staff from the Office of the White House, the National Security Council, the National Economic Council, the Office of Management and Budget, USDA, USAID, and the Department of State.

[38]USDA's September 6, 2000 *Federal Register* notice requesting proposals said CCC would consider multiyear proposals subject to an annual review of commodity availability and program performance. Several PVOs complained about confusion about the time frame of the pilot (1 year versus 3 years), based on statements made by USDA officials, and said the ambiguity adversely affected their ability to develop proposals and negotiate project agreements.

would have to end the program or sustain it through the foreign aid budget, which is expected to have many competing priorities in the foreseeable future.

USDA Lacked Expertise on School Feeding Programs

USAID—traditionally the U.S. agency for providing foreign development assistance, including school feeding and food for education programs—would normally have been the logical choice to establish and run the pilot. However, in light of constraints on foreign aid funding generally and other high priority development needs, the administration wanted CCC[39] to manage the pilot, and to do so using available surplus agricultural commodity funding authority (i.e., section 416(b) of the Agricultural Act of 1949).

The administration's decision to assign management responsibility for the pilot to USDA rather than USAID follows a recent trend of giving USDA a larger role in U.S. food aid programs, primarily because of increased section 416(b) program activity. However, USDA lacked USAID's resources (such as USAID's overseas development missions) and USAID's school feeding/food for education development expertise.[40] The principal mission of USDA's Foreign Agricultural Service (FAS) is to help ensure open markets for U.S. agricultural exports; it generally has had little experience

[39]CCC is a wholly owned government corporation, which has the legal authority to borrow up to $30 billion at any one time from the U.S. Treasury. CCC must eventually repay the funds it borrows from the Treasury. But because CCC spends more than it earns, its losses must be replenished periodically through a congressional appropriation so that its borrowing authority is not depleted. The Congress generally provides this infusion through the regular annual USDA appropriation law. However, in recent years CCC has received a "current indefinite appropriation," which in effect allows CCC to receive such sums as are necessary during the fiscal year for previous years' losses and current year's losses. See Congressional Research Service, *RL31001: Appropriations for FY2002: U.S. Department of Agriculture and Related Agencies* (Washington, D.C.: August 3, 2001).

[40]Although CCC is part of USDA, the administration's decision to use the Commodity Credit Corporation's surplus disposal program to fund the pilot program did not necessitate that USDA manage the food for education projects that were funded by the program. For example, under an interagency agreement, USDA used USAID to administer its overseas section 416(b) activities until 1992. USAID noted that, like USDA, it did not have the financial and human resources to undertake the pilot program. Thus, if a new interagency agreement had been signed, USAID would have required additional resources to design and implement a successful pilot.

in managing school feeding development assistance programs.[41] USDA has previously used section 416(b) authority to provide some commodities for international school feeding programs, but we were told the amounts were relatively small[42] and not for integrated food for education programs. In contrast, USAID has been engaged in school feeding programs since the 1950s and administers economic and humanitarian assistance programs in more than 80 countries.[43] Beginning in the mid-1990s, USAID began reducing its support for traditional school feeding programs that provided only meals, citing mounting evidence that school feeding, in and of itself, contributed little to improving child learning ability or child nutrition on a sustainable basis. According to USAID officials, its school feeding assistance has evolved into programs designed to improve education (i.e., enrollment, attendance, and graduation rates, especially for girls) by focusing on national education policy reform, curriculum development, and teacher training programs. In 2000, USAID spent $33 million on PVO-operated food for education programs in eight countries that benefited 1.3 million children.

Pilot Program Was Launched Quickly and Has Been Understaffed

President Clinton announced GFEI on July 23, 2000. USDA began to implement the pilot program almost immediately, leaving little time for planning and relying on existing staff from within the Foreign Agricultural Service to work on the assignment. USDA issued its request for proposals on September 6, 2000, with a closing date for all submissions at the end of

[41]A comparison of USAID and USDA programming requirements shows that USAID ties program planning to agency strategic objectives in a much more integrated way than does USDA. For example, USAID requires sponsors to submit more detailed project proposals and reporting on project results, conducts more open and interactive project planning with sponsors, and has a broader and more formal decisionmaking and review process. USAID project proposal requirements that are not required by USDA include discussions of key assumptions and risks, relationship to existing programs, performance indicators, sustainability, and lessons learned. In addition, USAID requires that annual results be linked to the agency's strategic objectives.

[42]USDA officials told us they have not kept track of how much money the department has spent on previous school feeding programs.

[43]Two PVOs said they preferred USDA's management of food aid. IPHD said USDA was less bureaucratic, more responsive to field needs, and allowed more innovation by PVOs. Land O' Lakes said GFEI programs can involve significant private sector involvement, and USDA's substantial authority for procurement and shipping of U.S. food aid provides for greater continuity.

September. (See app. IX for key events from the time the concept of an international school lunch program was suggested until approval of the GFEI pilot program proposals.)

According to USDA officials, USDA was understaffed when the GFEI pilot was launched and a year later still lacked sufficient staff for handling food aid matters. For example, in a July 2000 meeting with PVOs to discuss the pilot program, the Secretary of Agriculture said the lack of staffing in U.S. agencies for running food aid programs was acute. At the same time, he said the president wanted to see some benefits from the pilot program before leaving office. In November 2000, a USDA official told us that USDA was generally understaffed for monitoring food aid programs. At a July 2001 meeting with PVOs, other USDA officials apologized to PVO representatives for having too few staff available to negotiate agreements and address other food aid program issues in a timely manner.[44, 45]

According to OMB, in March 2001, the administration authorized USDA to use $2.5 million of the $300 million in CCC funds for administrative salaries and expenses. According to a USDA official, the funds are being used to facilitate monitoring and evaluation of the pilot program's impact. As of September 2001, a year after the pilot was launched, USDA was still in the planning stage regarding hiring regional coordinators and local national staff in PVO recipient countries to help monitor pilot program projects.[46]

[44]USDA's Foreign Agricultural Service has managed the pilot with existing Program Development Division staff resources, which were already stretched thin because of a recent section 416(b) program expansion, personnel turnover, and slow hiring of replacements. During our review, a significant portion (ranging from between 25 percent to 33 percent) of the division's permanent staff positions were vacant.

[45]WFP and IPHD noted that many of the recipient countries were well into their academic year before USDA commodities were procured, shipped, and available for distribution.

[46]To provide a perspective on the pilot's staffing and resources, before the pilot program was announced, USAID estimated its Food for Peace Office would require a minimum of 6 months and more likely a year to establish a food for education pilot program that would operate in only 8 to10 countries. USAID projected a need for 16 additional headquarters staff, 4 additional regional field officers, and 16 to 20 Foreign Service nationals to support the regional officers. Additional staff and related costs were estimated at $5.5 million.

USDA Policy Change on Funding PVO Projects Delayed Implementation

USDA's September 2000 Federal Register notice indicated that CCC funds might be available to cover some of the cooperating sponsors' expenses related to implementing the school feeding projects. As a result, many PVOs submitted proposals based on the assumption that they would receive CCC funds to cover part of their expenses. However, in January 2001 USDA reversed its position, announcing that funding would not be available.[47] This meant that PVOs' expenses in recipient countries would have to be covered by selling (monetizing) commodities in the recipient countries and using the resulting local currency proceeds to cover in-country costs. The policy change further meant that PVO direct administrative headquarters' costs could not be covered, since the section 416(b) program does not allow monetization of commodities for that purpose.

USDA's policy shift resulted in several of the proposals having to be restructured, causing discontent within the PVO community and leading to delays in concluding a number of agreements. In fact, about one-third of the approved PVO agreements were not signed by the end of September 2001. In addition, the change presented problems for some PVOs because it required them to monetize increased quantities of commodities within recipient countries to recover some of their costs, and there were limits on the commodity tonnage that could be monetized effectively. Some PVOs were also upset because all of WFP's operating expenses, including headquarters' costs, were funded by CCC cash payments. Legislative relief in the form of limited CCC funding was provided to PVOs in late July 2001; at that time, only 4 PVO agreements had been signed.[48] (App. IX discusses the funding sources used for pilot program sponsors in more detail.)

[47]According to an executive branch official, the actual decision was made by November 2000.

[48]According to Mercy Corps International, many developing countries have strict laws about the conversion of local currency; as a result, it said, many of the approved proposals could not be implemented until after limited CCC funding was permitted. The alternative, according to CRS, was to decrease the scope of their programs.

Weaknesses in Program Management and Short Duration of Pilot Will Affect Monitoring and Evaluation

To know whether programs are effective, program objectives should clearly describe the intended end results and accompanying indicators so that changes and progress toward achieving the objectives can be tracked over time. However, USDA initiated its requests for proposals in September 2000 without having a comprehensive plan for how it would monitor and evaluate project performance and has spent much of the time since then establishing such a plan. USDA and WFP will collect baseline data on school enrollment and attendance for the time before the projects began and monitor and assess change in these variables over the course of the projects. However, USDA has not set specific targets or desired performance levels for enrollment and attendance in its agreements with most of its implementing partners. In addition, although improved learning is one of the three principal objectives of the pilot program, USDA said it will not monitor and evaluate performance on this variable, unless improved learning is an element within an agreement, because of the program's short duration.[49]

Officials from USDA's Foreign Agricultural Service told us USDA is responsible for evaluating the performance of WFP, PVOs, and the Government of the Dominican Republic in implementing GFEI projects. According to these officials, FAS' mandate is to monitor and review the 25 PVO and 1 country government projects in 20 countries from October 2001 through March 2003, and at appropriate intervals report to the Congress on the projects' status. They added that FAS headquarters staff is also responsible for evaluating WFP's GFEI project implementation. They stated that the agency intends to complete an interim status report on the pilot for the Congress by July 2002 that will address several performance-related issues.[50]

[49]According to a U.S. government official, as the pilot program evolved, the original emphasis on education appeared to shift toward feeding in a school setting, as evidenced by views expressed by USDA staff. According to CRS, the primary and secondary objectives of GFEI have never been clarified. (CRS said this was similar to other school feeding and food for education programs supported by other donors.)

[50]These include attendance and enrollment changes, gender equity, best practices, and other donors and their activities. The report will cull information from WFP, PVOs, the government of the Dominican Republic, monitors, regional coordinators, and FAS staff.

In its September 6, 2000, *Federal Register* notice, USDA said that cooperating sponsors would be required to report periodically the number of meals served, enrollment levels, and attendance levels, including female attendance levels. In addition, USDA said that reports should include information on infrastructure relevant to sustaining the feeding program, such as establishment of PTAs and community groups. However, the notice did not indicate whether sponsors would be required to collect baseline data on these variables, which would permit comparisons of conditions before a project got under way and when it was completed. It did not indicate whether or how success would be measured—for example, what percent improvement in attendance would represent achievement of the program's objectives. In addition, the notice did not discuss whether sponsors would be required to report on educational performance, one of the program's three principal objectives.[51]

In February 2001, USDA began negotiating final agreements with cooperating sponsors and WFP for approved proposals. As of December 2001, USDA had completed agreements for 21 of 26 approved cooperating sponsor project proposals. All 21 proposals contained provisions that required reporting on the number of meals served, enrollment and attendance levels (including female attendance), and establishment of infrastructure relevant to sustaining the feeding program, such as PTAs and community groups. However, less than half of these agreements indicated a requirement for baseline data; and a majority of the agreements did not specify performance targets for enrollment, attendance, and female attendance. None of the agreements included reporting requirements for educational performance. (According to USDA officials, PVOs opposed such reporting, arguing that the pilot was too short in duration to permit a meaningful analysis of impacts on learning.) By September 2001, 33 of 34 agreements for WFP projects were concluded, with 1 deferred until fiscal year 2002. None of these agreements specified requirements for measuring project performance; in fact, they did not even say that WFP would report the types of data USDA had required from cooperating sponsors, such as enrollment and attendance data.

[51]This objective was cited on the day the president announced the program at the G-8 summit; in USDA's *Federal Register* notice inviting project proposals; and in a fact sheet accompanying the announcement of approved proposals.

Nonetheless, WFP developed a detailed survey instrument for collecting baseline information on its GFEI-funded projects. The survey was pilot-tested in August 2001, approximately 1 year after USDA received proposals from WFP and cooperating sponsors. According to USDA and WFP officials, WFP conducted the surveys in a sample of schools[52] for all of its projects before the end of 2001 and before the food aid was distributed. In addition to collecting basic information on the feeding program,[53] the survey sought

- detailed baseline and subsequent performance data on school enrollment and attendance (broken down by boys and girls and grade level);
- the number of certified and uncertified teachers in the school;
- the number of classrooms;[54]
- certain baseline information on community and parental involvement[55] and health and nutrition issues; [56] and

[52]According to USDA, WFP planned on sampling a total of 3,700 schools in 23 countries, or roughly 161 sample schools per country. Actual country sample sizes were to range from 60 to 388 schools.

[53]Basic information included (among other items) whether the program is in a preschool, primary, or boarding school; whether it includes a breakfast, snack, dinner, or take-home ration; number of feeding days during the year; and whether the school has a kitchen.

[54]For enrollment, attendance, certified teachers, and classroom numbers, data were to be collected for the current year and the 3 preceding years if appropriate (most of the GFEI-funded WFP projects existed before the pilot, some for many years).

[55]Whether the school has a PTA; the number of men and women on a PTA executive; how many men and women (further differentiated by whether school teachers) are involved in managing the feeding program and distributing the ration; and whether parents contribute to the school financially or in kind.

[56]Type of water source for the school and used by children; sanitation and type of toilet facilities used by the children; and whether health and nutrition are part of the school program.

- whether the school had other ongoing programs related to effective school feeding programs and if so, the name of the donor providing the program.[57]

The survey also called for the use of focus groups[58] to collect views on the likely reasons why eligible children did not enroll and enrolled boys and girls did not attend school during a year.

The survey instrument indicates WFP's interest in upgrading monitoring and evaluation of its feeding programs, since previous efforts revealed some weaknesses.[59] However, the survey included only two questions focused on the possible impact of the programs on improved learning.[60] WFP is sharing its survey results with USDA. (See app. III for additional information on WFP activities to improve monitoring and evaluation of school feeding programs.)

During the summer of 2001, USDA was still debating how to monitor and evaluate performance for the cooperating sponsors' projects. In August 2001, it convened a working group of USDA officials and USAID consultants with expertise in monitoring and evaluation methodologies to discuss the issue. The group recommended use of local school or government records for collecting data on enrollment and attendance, but it was against collecting quantitative data on indicators for measuring

[57]Teacher training; books; classrooms; curriculum development; nutrition; worm eradication; water supply; sanitation; HIV/AIDs education; and reproductive health issues.

[58]Of school teachers and, for the latter indicator, a separate focus group of pupils as well.

[59]Standard and up-to-date data had not been collected across its many projects. Our review of several WFP evaluations of country programs that included school feeding projects that were completed in 2000 indicated problems in monitoring of project activities and objectives. For example, an evaluation of a project in Peru concluded the project did not have a good monitoring and evaluation system, lacked baseline surveys, and lacked impact indicators to measure improvements. An evaluation of a school feeding project in Yemen found that monitoring by the Ministry of Education and the WFP country office "is weak, irregular, and altogether severely deficient." WFP officials said actions are being taken to correct these weaknesses and noted that transparent and self-critical evaluations are an integral part of their management system.

[60]One question seeks data on the number of boys and girls who had completed primary school the previous year and had gone on to higher education. The second question, to be addressed by separate focus groups (teachers and pupils), seeks views on the significance of the school feeding in relieving short-term hunger and helping maintain attention in school.

educational progress (such as reduced dropout rates, retention and/or completion, and promotion to the next grade) and level of community participation and infrastructure development. For the latter variables, it recommended information be collected through a combination of focus groups and structured interviews with school staff and parent and community groups.

In fall 2001, USDA decided to use the WFP survey instrument for the cooperating sponsors' projects and, like WFP, apply the survey in a sample of the schools in each project. According to USDA officials, doing so would allow collection of comparable data, provided USDA's sampling strategy was properly designed. USDA also decided to contract with about 20 local national monitors (approximately 1 per country) to collect the data and 5 regional coordinators to manage the monitors. In late December 2001, USDA officials told us they planned to add a few more questions to the survey to address concerns about whether some of the projects were well targeted.[61] They also said the surveys would be conducted in early 2002.[62]

USDA officials told us that they ultimately decided not to measure change in school learning. They said that from the beginning of the pilot, USDA, WFP, and PVOs were concerned about the ability to effectively evaluate and judge an increase in student performance under a 1-year pilot program. Research that tries to demonstrate improvements in academic achievement is lengthy and requires a long-term approach, they said. USAID officials with whom we spoke were also critical of the short time allowed for running the pilot program. They said USAID pilot programs usually take 4 to 5 years, with an evaluation done in the third year to see if the program is on track, and an assessment of the impact conducted in the fourth year.

[61]For example, one national monitor questioned a project to provide only cow's milk to 96 schools in Vietnam. According to the monitor, most of the children had never tasted milk, and a number of health professionals were concerned that there would be an initial problem with tolerance. In addition, school officials told him that 97 percent of the school-age children in the areas were enrolled and attendance was not a problem. In another case, involving Honduras, USAID said that teachers reported to work during less than half of the school year, raising concern that attendance might be adversely affected.

[62]According to USDA officials, a number of management issues delayed finalizing a monitoring and evaluation method, such as the time needed to conclude agreements with implementing partners, assess options for how USDA could monitor and evaluate the projects (including developing baseline data), establish external monitors and regional coordinators, and secure financing for the additional personnel.

Processes to Prevent Disincentive Effects of Food Aid Raise Some Concerns

An effective global food for education program needs to ensure that food aid does not interfere with commercial markets and inhibit food production in developing countries.[63] USDA uses an international consultative process—the Consultative Sub-Committee on Surplus Disposal (CSSD)—to keep the pilot program's food aid from interfering with commercial exports. The process involves notification of various categories of food aid donations, prior consultation with other exporters, and establishment of Usual Marketing Requirements (UMR) to ensure that food aid recipients maintain a normal intake of commercial imports in addition to the food aid they receive. According to the CSSD, in recent years several factors reduced the effectiveness of the UMR approach, including (1) lack of uniformity in the compliance period (fiscal year, crop year, and calendar year); (2) fewer food aid operations covered by the UMR because many transactions are exempt; (3) a rise in UMR waivers[64] for countries facing difficult economic situations; and (4) delays in collecting trade data, which make establishment of 5-year average commercial imports as a benchmark for current import levels unrealistic. USDA officials acknowledged that some countries have expressed concerns that GFEI might adversely affect commercial exports but said they have not received any specific complaints about the U.S. pilot's food exports.

To address disincentive effects of food aid on local production, the United States requires all proposed food aid projects to submit an analysis showing the recipient has adequate storage facilities and that food aid will not disrupt domestic production and marketing. (Technically the analysis is known as a Bellmon determination.)

[63]The sale of U.S. commodities in a recipient country can have food security benefits for the recipient country, depending on how the sale is handled, due to increased food availability in local markets.

[64]The UMR can be waived or reduced in unusual situations, such as severe drought, floods, balance of payment difficulties, or the absence of reliable import data.

We reviewed the analyses by cooperating sponsors whose projects were approved for the pilot and found the analyses were not adequate for determining disincentives to production of local commodities. All cooperating sponsors concluded that the amount of food for their projects was so small it was unlikely to significantly affect local production. But their analysis of data on local market conditions was generally based on production of identical commodities. For example, if wheat was not grown in the recipient country, sponsors concluded there was no disincentive to importing and monetizing wheat—without considering whether the amount of imported wheat would affect price or demand for locally produced substitute commodities. Cooperating sponsors did not adequately verify that the commodities were in demand and would not compete with local markets, other commercial export programs, and other donor imports.[65]

[65]According to CRS, the extremely short time frame from the announcement of the GFEI proposal due date might have been a factor in the depth of the cooperating sponsors' Bellmon analyses. In addition, it said, such analyses can be quite costly if done right, and sponsors have to take into consideration the return on investment. It is more likely that sponsors would undertake detailed analyses after projects are approved or contingently approved, when they could be assured of project support. Land O' Lakes, Inc., said Bellmon analyses would be more useful if they were made after or at the time agreements were awarded rather than early in the proposal process.

USDA officials told us that cooperating sponsors are responsible for analyzing the potential disincentive effects of their projects. They said USAID no longer has agricultural officers stationed overseas and now USDA has to rely on PVOs—which have on-the-ground, in-country staff—to determine whether the food aid will adversely affect recipient country markets. (USAID advised us that while the number of agricultural officers overseas has been reduced in recent years, it still has such officers in a number of posts.[66]) Although USDA and/or USAID attaches may review such analyses, USDA does not independently verify the results.[67] USDA officials also noted that the lack of good data could affect sponsors' ability to prepare more robust analyses. USDA does not require WFP to conduct or submit similar analyses of WFP projects that are partly funded by the U.S. pilot program. However, WFP told us a review is required of all WFP proposed projects for their potential impact on production and markets, and food aid donors (including the United States) participate.[68]

[66]According to ACDI/VOCA, its Bellmon analysis for Uganda was prepared by the USAID Mission in Kampala, and addresses the levels and types of commodities that could be used for direct distribution without creating a disincentive.

[67]According to USAID, it requires the USAID Mission Director or, in the absence of a USAID mission, the principal officer at post certify that there will be no disincentive to local agricultural production or marketing prior to a cooperating sponsor in that country receiving P.L. 480 Title II food aid commodities. USAID/Washington has provided temporary duty assistance to posts to assist them in performing the necessary analyses.

[68]According to USAID, a recently issued report, by the Royal Danish Ministry of Foreign Affairs, looked at WFP programs in Bangladesh, Bolivia, Nicaragua, Vietnam, and Zambia, and found no examples of market disruption associated with the programs.

Key Weaknesses in Financial Accounting Could Have Negative Impact on Pilot Program

We identified several weaknesses in how USDA has maintained financial accountability over WFP and PVO projects that could adversely affect the pilot program. Although USDA advances funds (in the case of WFP) or food (in the case of cooperating sponsors) on the basis of their estimated needs and requires them to provide regular though different forms of financial and project status reporting, WFP in particular has not adequately accounted for past Section 416(b) program donations. The PVOs provide more detailed financial reporting, in part, because a large portion of the commodities they receive are to be monetized in country to cover food[69] and other expenses. USDA requires that PVOs monetize commodities at market prices, but it has not systematically tracked whether the PVOs received prices for the monetized commodities that were commensurate with their cost or whether the funds were spent in accordance with approved program plans.

WFP Reporting Has Been Inadequate

Under a section 416(b) umbrella agreement, WFP is required to account for the costs it incurs and charges USDA on food aid donations. WFP is supposed to submit annual standardized project reports that provide implementation and actual expenditure data for ongoing activities similar to what is required of PVOs. We found that WFP had not met its obligation to provide USDA with an accounting for past Section 416(b) program donations by providing detailed actual cost data. As a result, USDA is not in position to know whether its advances to WFP, on the basis of initial cost estimates, are consistent with actual project costs and to what extent the project objectives are being achieved within the approved budget estimates. A similar situation exists with USAID-funded donations to WFP. According to a USAID official, WFP has not provided actual cost data for direct and indirect project costs at the level of project activities and by donors. Such data is needed, the official said, to know whether the United States is meeting and not exceeding its fair share of a project's total cost, as well as the costs of specific project activities.

In April 2001, U.S. officials reiterated to WFP officials the need for disaggregated actual cost data. During the meeting, WFP officials noted that WFP was in transition, using a new financial information system for

[69]If a donated surplus commodity does not match cultural food preferences or needs of the recipient community, the commodity may be sold in the recipient country or neighboring countries and the proceeds used to buy local foods.

new business while still using the earlier system for old business. According to a USAID review conducted in June 2001, WFP's new system appeared to have the capacity to accurately monitor and report on full cost recovery in the aggregate. However, the system was not yet fully operational and thus the adequacy of the complete system could not yet be determined. In September 2001, WFP told USDA it would not be able to provide finalized reports for fiscal year 1999 obligations that were due by the end of that month. According to USAID, pursuant to bilateral consultations between an interagency U.S. government delegation and WFP management, the United States agreed to a 6-month extension for WFP to report actual cost data for all U.S. government contributions to WFP.

Oversight of PVO Monetized Commodities Is Limited

As previously indicated, a substantial portion of the commodities provided to PVOs are to be monetized, with the proceeds used to pay for other foods and/or other expenses, such as administrative expenses and inland transportation, storage, and handling costs. For the first 17 completed PVO agreements, more than 80 percent of the commodities are to be monetized. At issue is whether USDA is sufficiently tracking the proceeds that PVOs receive from the commodities they monetize.[70] Also, if a PVO sells a

[70]A recent USDA study of its food aid monetization programs cited difficulty evaluating the programs' impacts because of limited personnel resources, high staff turnover, and increasing demands to implement large food aid programs. In addition, the limited presence of overseas agricultural attaches has adversely affected USDA's ability to oversee some of its sponsors' monetization projects, the study said. USDA's Inspector General has also expressed concern about this matter.

commodity for less than the market value, the commodity could undercut other commercial sales, including imports or domestically produced commodities, and fewer proceeds would be available for financing the school meals or related activities.[71]

USDA regulations require that PVO commodity sales meet local market conditions and that PVO and government sponsors provide a report showing deposits into and disbursements out of special accounts established for commodity sales proceeds. In past Section 416(b) programs, USDA did not determine to what extent proceeds compared with what sponsors expected to receive as stipulated in the project agreements, nor whether the commodities were sold at real market prices. However, in September 2001, USDA officials told us they plan to conduct such an analysis for the pilot program projects.[72]

[71]All other things being equal, monetization of commodities to pay for other program costs is less efficient than direct funding because of the added costs involved in transporting, storing, and handling the commodities, as well as additional costs to monetize them. However, the purchase of additional commodities to pay for other program costs has some benefits for U.S. farmers, if the purchase does not undercut farmers' commercial sales in the food aid recipient countries, and for U.S. commodity processors, domestic transporters, and U.S. shippers. According to a U.S. government official, any benefits are likely to be negligible given that the volume of commodities involved is small relative to U.S. and world agricultural output. According to Land O' Lakes, Inc., in the case of nonfat dry milk (NFDM) donations, any inefficiencies would be offset, since the U.S. government purchases NFDM though domestic milk support programs and has to pay storage and carrying costs for the commodity. In addition, Land O' Lakes said, monetization has supported the introduction and expansion of the use of American commodities in international markets.

[72]USAID's approach for its sponsors who monetize food aid requires that PVOs sell the commodity at a value equal to at least 80 percent of the commodity, insurance, and freight cost or at 100 percent of the free alongside ship value of the commodity. In addition, USAID reevaluates market conditions after the food aid has been monetized to assess whether this condition has been met. USAID's policy is said to concern some sponsors and commodity groups since it may limit the countries and type of commodities available for monetization. Because it is difficult for a PVO to know the local market price for a commodity in a country where the activity is insufficient to constitute a market, commodities may be sold at prices that are below the world market price.

Most Other Donors Currently Uncommitted or Opposed to Major Support of GFEI

The success of a comprehensive, long-term GFEI strongly depends on other donor support, but most other donors are either opposed or not committed to supporting GFEI at this time. A few donors have indicated support for the food for education initiative but have offered little in terms of specific additional contributions. While WFP officials are confident of eventual support, most donor countries seem unlikely to provide substantial support unless the United States adopts a permanent program that is not dependent on surplus commodities and/or unless the pilot program demonstrates strong, positive results. Some donors are opposed to GFEI on the grounds that developmental food aid assistance is ineffective in promoting sustainable development. Others are noncommittal for a variety of reasons, including possible adverse impacts on commercial agricultural exports to and domestic agricultural production in recipient countries.

Long-Term Program Will Need Substantial Support from Other Donors

The U.S.-proposed GFEI challenged other donor countries and organizations to join the United States in helping achieve the goal of education for all children in developing countries by 2015. Indeed, the United States said that its willingness to extend the pilot program beyond its first year would depend in part on other donors' response.[73] Since the initiative was first proposed, U.S. officials have indicated they would like to see other donors contribute, in aggregate, anywhere from two-thirds to three-quarters of the total cost of a global food for education program.

The Clinton administration estimated that at least 300 million children in developing countries need school meals. Assuming an annual average cost of $34 per student for a 180-day school year, the annual meal cost alone for 300 million children would be approximately $10.2 billion.[74] To put this estimate in perspective, in 1999, $10.2 billion represented about 96 percent

[73]Under the pilot, which had been scheduled to start in late 2000, the initiative was to be assessed in 2001 and a determination made on whether to proceed with a truly global program.

[74]As discussed earlier, costs can vary significantly, depending on the type of food used and other factors. In July 2001, WFP reported the average cost of its school feeding development projects in 2000 as 19 cents per day ($34 for 180 days). (See app. V.) The $10.2 billion estimate is higher than that cited by President Clinton in December 2000, who said it would cost about $6 billion to $7 billion annually to provide a meal to 300 million children every single day for a year.

of the Organization for Economic Cooperation/Development Assistance Committee countries' official development assistance[75] to least developed countries, or about 18 percent of development assistance directed to all developing countries. In addition, net official development assistance has declined during the past decade, from $56.7 billion in 1991 to $53.7 billion in 2000.

We estimate the food tonnage required to provide a school meal for 300 million children (for a 180-day school year) to be in excess of 16 million metric tons, which would exceed average annual global food aid deliveries between 1990 and 2000 by about 40 percent.[76] (Global food aid deliveries averaged approximately 12 million metric tons per year from 1990 through 2000.) Moreover, food aid for development programs, only a part of which is for school feeding, averaged about 3 million metric tons per year. Thus GFEI would represent more than a fivefold increase for these types of programs.

Donors Have Been Generally Noncommittal to GFEI

According to a State Department cable, when the United States proposed GFEI at the July 2000 G-8 Summit, the proposal received a cool reception. Subsequently, in November 2000, the State Department headquarters asked U.S. diplomats in 23 countries to explain the U.S. pilot program to foreign governments and encourage their support. In addition, the previous U.S. Ambassador to the U.N. Food Agencies in Rome sought other countries' support for GFEI through his participation in the WFP Executive Board and in official visits to food aid donor countries, such as Denmark and Finland. These efforts notwithstanding, most donor countries have yet to respond in a strongly positive or substantial way.

[75]Official development assistance includes grants or loans to developing countries at concessional financial terms (if a loan, having a grant element of at least 25 percent) to promote economic development and welfare. Technical cooperation is included in aid. Grants, loans, and credits for military purposes are excluded.

[76]According to WFP, the recommended daily school feeding ration for full-time primary school students can range between 600 to 2,000 calories, depending on whether schools are half day, full day, or boarding. For day schools, the recommended acceptable range is between 1,200 to 1,500 calories. Our food tonnage estimate was based on meals comprised of corn and vegetable oil and providing 1,200 calories. The average weight of a single meal was estimated at 300 grams of corn and 12 grams of vegetable oil. Thus, for 300 million children in school 180 days a year, the combined tonnage is 16.8 million metric tons.

Of the top 13 food aid donating countries for the period 1995 through 1999, the United States supplied more than half of all deliveries, with the other donors providing slightly more than 41 percent (see app. X). Table 3 summarizes general views of all but one of these other donor countries as well as Finland[77] and their plans or actions to contribute to GFEI or the WFP's school feeding initiative. As table 3 shows, representatives of 4 of the 12 donors (Japan, France, Italy, and Finland) indicated general support for the food for education initiative. The European Commission, the second largest provider of food aid in the world, has said it is against a "one-program-fits-all" approach, citing a preference for strategic planning that identifies all of a country's development needs and then analyzes alternative ways to achieve them.[78] According to the Commission, education forms an integral part of the European Union's development policy, and it is crucial that all shortcomings in providing education are tackled at the same time. If analysis indicated that a food for education program would have a positive impact, the Commission would still want to assess the relative cost effectiveness and efficiency of the alternatives. Representatives of Germany, the United Kingdom, the Netherlands, and Sweden also expressed reservations about GFEI not being an integrated approach to development assistance and/or about the ability of recipient countries to sustain the programs over the long run. Representatives of Australia, Canada, Sweden, and the United Kingdom indicated they would like to see whether the U.S. pilot program or WFP program demonstrates successful results. Representatives of the European Commission, Canada, Germany, the Netherlands, and Sweden expressed concerns about or said

[77]Table 3 does not include China, which ranked ninth in the world, based largely on its large cereals deliveries to North Korea between 1996 and 1999. We included Finland, which ranked twentieth, because it was cited by U.S. officials as a country strongly supportive of the pilot program.

[78]Individual member states of the European Union can take a different position on GFEI from that of the Commission.

they thought the U.S. program was being used to dispose of surplus commodities.[79]

Table 3: Other Donors' Overall Views on the Food for Education Initiatives

Donors[a]	General views on GFEI and/or WFP School Feeding Initiative	Plans or actions to contribute to GFEI or WFP School Feeding Initiative
European Commission	It is unlikely the Commission will join GFEI; the Commission has no plans to do so. Will not encourage or participate in a one-program-fits-all approach. The Commission creates regional or country strategic plans identifying all development needs and analyzes the best ways to meet those needs on a case-by-case basis. U.S. program's use of surplus commodities and desire to aid U.S. farm incomes introduce inefficiencies and confuse objectives, leading the Commission to question the program's legitimacy.	If the U.S. program did not use surplus commodities, the Commission probably would not oppose GFEI, but it does not foresee supporting the program. It will continue to include educational and nutritional provisions in its own development programs, and in cases where food aid, through school feeding programs is appropriate, it would be ready to support SFPs for a limited period of time.
Japan	Basically supports GFEI but is not strongly positive. Japan wants to support development but not particularly by the use of food aid. There is uncertainty about whether GFEI will continue.	Has no plans to make supplemental contributions to the initiative.
Canada	Thinks there may be better ways to promote food security for development. Has some concern about whether GFEI is being used to dispose of surplus commodities. Says recent U.S. food aid has not always been used in a nontrade distorting way. Believes it would be premature to go forward with a global program before WFP and U.S. demonstrate results for their SFPs.	Has no planning under way for a direct contribution to GFEI. Will await results of WFP and U.S. initiatives.
Australia	Has made no formal public statements supporting GFEI. Is adopting a wait-and-see position. The U.S. pilot program has to demonstrate positive results.	If the program is sustainable, minimally distorting, and helps feed and educate children, Australia would consider it an option.

[79]At a January 29, 2002 symposium, Dan Glickman, former U.S. Secretary of Agriculture when the pilot program was initiated, said while 70 percent of food aid worldwide had been supplied by the United States in recent years, it was the result of domestic political pressures to raise commodity prices for the benefit of American farmers, not out of any long-term plan to improve diets in poor countries. He also said that efforts to make development policy a higher priority during the Clinton administration were eclipsed by budget constraints imposed by Congress. At the same meeting, John Podesta, President Clinton's former chief of staff, said establishing a coherent and sustainable development policy was a daunting task partly because it would be hard to sustain current levels of public interest, also because of interagency turf wars and lack of overall leadership and accountability. See: "Making Development Policy in the New Era: Priorities, Politics, and Structures of U.S. Policymaking on Global Poverty and Hunger," *Resources for the Future News Release* (Washington, D.C.: January 29, 2002).

(Continued From Previous Page)

Donors[a]	General views on GFEI and/or WFP School Feeding Initiative	Plans or actions to contribute to GFEI or WFP School Feeding Initiative
Germany	Prefers a multisectoral approach to development that includes health assistance and is supported by other donors and international organizations. Believes the trigger for the U.S. program was surplus commodities. Wonders whether U.S. program will be long lasting; Congress enacting a permanent program would address this concern.	Does not specifically support WFP's SFPs, but contributes to WFP development programs in specific countries and does not exclude from consideration WFP programs with an SFP component. Does not plan to provide separate support because of Germany's overall budget situation.
France	Has generally good impressions of the U.S. program, but program could be dangerous if it donates only surpluses. GFEI could be important to developing countries, but their local agricultural production must be respected. Wants donors' actions to be transparent.	May undertake initiatives similar to the U.S., working through WFP or through French or European NGOs. However, France wants to maintain the current level of WFP development activities, not expand it. France's contribution could be cash, food, and or technical aid.
United Kingdom	Supports the "education for all" goal but does not think GFEI will help. Sees chronic undernutrition as a long-term development issue that must be dealt with by alleviating poverty. WFP's SFPs have not worked well due to lack of sustainability in the developing countries. Over the long run, recipients must be able to pay for teachers, books, etc.	Is not going to provide early funding for the initiative. Will wait for results of U.S. program. Would only support program if it were sustainable and backed by local governments with resources to support it. Believes that developing countries are not very enthusiastic about these programs because they have not previously asked for them.
Italy	Strongly supports the WFP school feeding initiative.	Contributed approximately $952,000 to the WFP initiative in 2001 for three countries in the Horn of Africa region.
The Netherlands	SFPs are among the best ways to boost enrollment and attendance but does not think the programs are sustainable once donors leave. WFP initiative seems driven by the U.S. and is probably a result of surplus U.S. commodities. If U.S. did a cash only program, the Netherlands would be more receptive.	Will not contribute to WFP initiative because of concerns about sustainability. In its bilateral programs, which are cash funded, the Netherlands would consider a program only if the recipient country asked for it and the Netherlands believed the education sector would benefit.
Denmark	Has not done much about GFEI. Has a sectoral approach to development. Would look at SFPs in terms of a wider effort focusing on food security and development—including the education sector (e.g., teachers, books) because it is not adequate to feed a child if education is not improved.	Told the U.S. that it would evaluate GFEI for possible additional funding. (But U.S. officials in Rome said it would be hard to get Denmark to increase its funding, since it already gives 1 percent of its GNP to foreign aid.) Might reallocate some of its existing WFP donation to the SFP initiative.
Sweden	Welcomes GFEI but concerned that such a huge program could disturb markets. Conducts its development policy through integrated rather than separate programs such as school feeding. Sees U.S. initiative as a way to get rid of surpluses.	Will track GFEI's progress and may contribute to it if the program is deemed excellent. But may decide to provide more money to education or give additional cash to WFP and let WFP decide how to spend it.
Finland	Concept of universal school feeding and WFP's program strongly endorsed by Finnish President and Minister of Agriculture. Cautioned that food aid should not be used to dump excess agricultural product without taking into account its effect on other countries.	Supports initiative through nondirected contribution that WFP can use for whatever development purpose and countries it decides upon. But has not indicated it will direct WFP to assign the contribution to the school feeding initiative or that it will increase its donation.

Note: Most of the information presented in the table is based on our interviews in February and April 2001 with representatives of the countries, supplemented in a few cases by information contained in U.S. government documents. European Commission views are based primarily on a written statement provided to us in July 2001. A few donor country representatives said that their governments had not formulated an official view on GFEI but agreed to comment on the issues.

[a]Donors are presented in descending order, based on the total amount (annual average) of all their global food aid deliveries during 1995-99 (see app. X).

Source: GAO analysis.

In addition, some donors indicated they favor using food aid for emergency (rather than development) purposes, expressed reservations about providing assistance for school feeding programs in the form of food or surplus commodities, or indicated they lack convincing information on the effectiveness of WFP school feeding activities. (See app. VIII for additional information on donor views on food aid.)

Regarding actual support for GFEI, Italy has contributed nearly $1 million to the WFP initiative in three African countries. A French representative said France might provide some support, either on its own or through WFP, but added that France wanted to maintain its current level of WFP development activities, which would limit France's ability to greatly increase funding for WFP's school feeding initiative. Representatives of Japan and Finland, the two other supporters, indicated their countries would not increase their current level of donations to support the initiatives. Meanwhile, representatives of Canada, Australia, the United Kingdom, and Sweden all indicated that they would track the progress of the food for education initiatives for the results. The German representatives said their country's budget situation does not permit providing additional support.

In mid-April 2001, the U.S. Ambassador to the U.N. Food Agencies in Rome acknowledged that there had been very little movement by other donor countries toward supporting GFEI but said that they were coming around to the idea. They want to see an American commitment, which will begin with the pilot program's implementation, he said. The Ambassador said he thought Denmark, Finland, Norway, and Sweden would be on board within the next few months and that France and Germany would soon join in. At the same time, WFP officials told us that most or all governments, donors and recipients alike, support a global school feeding effort and that they were optimistic that additional contributions would be forthcoming by the end of 2001.

At the beginning of August 2001, WFP officials told us the Swiss government was contributing 194 metric tons of food, and France intended to contribute a total of 5,280 metric tons of rice, beans, oil, and corn/soy blend to a Honduran program. In addition, they said, Cargill, Inc.,[80] had provided a $50,000 donation to assist WFP's school feeding operation in Honduras (to be matched by the local Cargill affiliate in Honduras). Apart from food donations, the Canadian government approved the use of a $250,000 grant facility for WFP for a deworming effort in conjunction with WFP school feeding efforts in Africa, WFP officials said.[81] In addition, an international fund offered to consider providing upwards of $300,000 to fund nonmeal items (such as construction of schools, teacher training, training materials, school books, and cooking utensils) in least-developed countries. And, the officials said, WFP was negotiating new partnerships for school feeding, including the health, sanitation, and educational aspects of primary schools, with a variety of U.S. government and international agencies.[82]

At the end of December, 2001, the U.S. Mission to the U.N. Food Agencies in Rome told us that Italy, France, and Switzerland were still the only countries that had agreed to supplement the U.S. government contribution to the WFP school feeding program.

[80]Cargill is an international marketer, processor, and distributor of agricultural, food, financial, and industrial products and services with 90,000 employees in 57 countries.

[81]WFP is using the grant in part to work with WHO and the World Bank to quickly and comprehensively expand deworming activities to a much larger number of countries and students. In early August, WFP told us the grant was used to fund workshops involving seven Anglophone African countries, WFP, WHO, and the World Bank. The Canadian grant was used to fund the workshop costs for up to $50,000 per country for deworming treatments in WFP-assisted schools. In addition, WFP said, World Bank education loans are being used to fund deworming programs in the countries. WFP also said that World Bank education loans with a school health/FRESH component would be the source of the bulk of funds necessary to expand the program, and the Canadian government also may provide additional funding. (FRESH is a partnership developed by the World Bank, WHO, UNICEF, and UNESCO, to improve the health and nutritional status of school-age children.)

[82]The July 2001 G-8 Summit established an Education Task Force to provide advice to G-8 leaders in cooperation with developing countries, relevant international organizations, and other stakeholders on how the G-8 can best support the achievement of the education for all goals. WFP was invited to and agreed to participate in the task force's February 18, 2002, meeting.

Conclusions

In our review of the current GFEI pilot, we found a number of weaknesses that make it difficult to evaluate the program's effectiveness. For example, our research of past school feeding programs indicated that the programs are more likely to improve enrollment, attendance, and learning if they are carefully integrated with other educational, health, and nutritional interventions—such as ensuring adequate numbers of well-trained teachers and providing treatments for parasitic infections and micronutrient deficiencies. However, USDA began the GFEI pilot quickly and did not require potential implementing partners to provide important information on the linkages to these other interventions. Since most of the pilot's funding is targeted for the school meals, it is unclear whether these other important factors that contribute to effective programs are adequately addressed. In addition, USDA has not effectively managed the pilot in part because of its lack of expertise and resources for food for education development programs. It has not set specific targets or desired performance levels for enrollment and attendance in its agreements with most of its implementing partners. WFP has recently collected baseline data on enrollment and attendance, and USDA is in the process of doing so. USDA will not try to measure the projects' impacts on learning, as it believes the 1-year time frame is too short for such an assessment.[83] Because of these weaknesses, we do not believe the pilot program will yield adequate information on whether its projects have succeeded or failed in improving enrollment, attendance, and learning—and why. Furthermore, a number of other donor countries will not contribute to GFEI until they see if the pilot is successful. These are important concerns as the Congress considers what actions to take regarding legislation on GFEI.

Matters for Congressional Consideration

As the Congress decides whether to further fund GFEI, it may wish to consider:

- extending the pilot program to permit an assessment of its effects on learning, as well as a more meaningful review of its impact's on enrollment and attendance;

[83]Unless improved learning is an element within an agreement.

- deciding whether additional funding for pilot project related activities, such as teacher training and textbooks, may be needed for effective projects;
- assuring that the administering agency has sufficient expertise and staff resources to effectively manage the program; and
- requiring the administering agency to establish measurable performance indicators to monitor progress and evaluate project results.

Agency Comments and Our Evaluation

We received written comments on a draft of this report from USDA, USAID, and the Office of Management and Budget (OMB) that are reprinted in appendixes XII, XIII, and XIV. These agencies also provided technical comments, which we incorporated in this report as appropriate. The Department of State's liaison for GAO told us that State believes the report findings are essentially factual and correct and opted not to comment further. We also obtained technical comments on parts of the report from the World Bank, WFP, and six PVOs and have incorporated them as appropriate.

In its comments, USDA reiterated a number of key points and findings that were in the draft report and provided some additional information about certain aspects of the pilot program. Beyond that, USDA said it believes we have taken an overly critical view of how it has administered the pilot program, given time and resource constraints. Our draft report cited time and resource limitations as key factors affecting the management and possible effectiveness of the program. USDA also said it believes the report fails to recognize that the president directed a school feeding program, not an entire educational program. We disagree with this statement. We clearly said— as the White House did on the day the program was announced and as USDA itself did in its comments—that the pilot is a school feeding program with the three purposes of improving student enrollment, attendance, and learning.

USAID said our draft report accurately and fairly depicted the complex and formidable challenges confronting the GFEI, fully endorsed our matters for congressional consideration, and said the findings and matters should be of great use to the Congress as it debates the structure of U.S. food assistance. USAID observed that the pilot placed priority on getting the program up and running, with program designers believing that improvements could

then be made that would address issues of cost, sustainability, and the need for complementary programs.

OMB commented that the draft report was balanced and generally accurate and would serve the Congress and the public in future deliberations about school feeding programs. OMB also said that the principal criticisms of the pilot program problems may be attributable to th

Scope and Methodology

We obtained information on the Global Food for Education Initiative (GFEI) and pilot program from U.S. government officials at the Departments of Agriculture (USDA) and State, as well as officials from the Agency for International Development (USAID), the Office of Management and Budget (OMB), and the White House. We also obtained information from officials of the World Food Program (WFP), foreign donor governments, and representatives of private voluntary organizations. In addition, we met with representatives of the European Commission and the World Bank, and experts from private research institutions. We conducted our review in Washington, D.C.; Rome, Italy; and Brussels, Belgium.

Our review addressed lessons learned from past international school feeding programs, the application of lessons learned to the pilot program, an assessment of the design and implementation phase of the pilot project, the impact of the GFEI on recipient country agricultural markets, and the commitment of other donor countries to the initiative. Our review did not address the in-country phase of the pilot program because projects were not operational during most of the time of our review. Our contact with PVOs was limited because most of their agreements were not finalized until we had completed most of our field work.

To examine the lessons learned about the effectiveness and cost of school feeding programs in promoting increased school enrollment, attendance, and performance, we reviewed studies completed by the U.S. government, international organizations, private voluntary organizations, and private research institutions. We also met with selected experts in international school feeding. We reviewed the studies in terms of past programs' impact on enrollment, attendance, and learning. In reviewing studies and meeting with experts, we also identified key factors common to effective school feeding programs. Through our analysis of information from World Bank and WFP, we also compared estimated costs of various school feeding programs.

To examine the extent to which the U.S. pilot program has been built upon the lessons learned from previous school feeding programs, we met with senior officials of the USDA and State, USAID, the White House, and OMB, as well as representatives of private voluntary organizations, research institutions, and international organizations. We also reviewed program decisionmaking documents. We compared information obtained from these sources to key conclusions of past international school feeding studies and the views of various experts.

To determine whether the U.S. pilot program was designed and implemented to reasonably ensure that the food aid and monetized proceeds were used effectively and efficiently, we gathered information and met with officials from the USDA, USAID, the White House, and OMB. We also obtained information from private voluntary organizations and WFP. We reviewed pilot program guidance, proposals, and relevant laws and regulations governing the development and administration of the pilot project. We also gathered and analyzed a variety of key pilot project information to provide estimates of tonnage, project costs, and number of beneficiaries by cooperating sponsor. We assessed selected information in proposals for approved pilot projects and nonmeal program components of these projects, including the amount budgeted and number of project beneficiaries. We applied our governmentwide internal control standards in evaluating the pilot project's management and financial controls.

To determine the views of other major food aid donors regarding support for a comprehensive, long-term global food for education initiative, we gathered information and met with officials from donor countries including Australia, Canada, Denmark, Finland, France, Germany, Italy, Japan, the Netherlands, Sweden, and the European Commission. We developed an analytical framework to summarize their individual and collective views on how food aid should be provided in terms of emergencies, development, cash, or food-in-kind.

We conducted our review from November 2000 through December 2001 in accordance with generally accepted government auditing standards.

Pilot Program Projects' Implementing Partners, Countries, Agreement Status, Tonnage, Cost, and Beneficiaries

Implementing partners	Recipient country	Date of agreement	Estimated tonnage for project[a]	Estimated project cost[a]	Number of beneficiaries
Government of the Dominican Republic	Dominican Republic	6/25/01	62,200	$14,147,783	1,000,000
PVO sponsors:					
ACDI/VOCA	Uganda	Not signed	8,710	$2,776,030	40,000
Adventist Development & Relief Agency (ADRA)	Bolivia	Not signed	6,270	$2,806,697	88,000
ADRA	Madagascar	8/16/01	4,900	$1,818,554	50,000
ADRA	Yemen	Not signed	5,000	$2,115,510	66,000
Cooperative Assistance for Relief Everywhere (CARE)	Albania	8/13/01	18,500	$4,724,901	16,000
Catholic Relief Services (CRS)	Albania	7/27/01	740	$1,279,139	4,000
CRS	Benin	8/23/01	3,350	$1,788,931	10,000
CRS	Bosnia/Herzegovina	6/20/01	24,630	$4,804,912	30,000
CRS	Guatemala	11/5/01	27,630	$5,078,170	27,000
CRS	Honduras	11/30/01	15,100	$3,957,800	10,000
Counterpart International (CPI)	Georgia	Not signed	26,600	$6,138,719	50,000
CPI	Senegal	8/20/01	7,550	$3,311,178	54,000
International Partnership for Human Development (IPHD)	Republic of Congo	7/3/01	18,300	$7,146,715	100,000
IPHD	Moldova	7/06/01	28,400	$11,796,455	300,000
International Orthodox Christian Charities (IOCC)	Georgia	4/20/01	10,800	$2,324,592	14,000
IOCC	Lebanon	6/26/01	27,000	$4,906,330	19,400
Land O'Lakes (LOL)	Bangladesh	11/15/01	34,950	$11,254,050	500,000
LOL	Vietnam	8/3/01	43,300	$10,781,997	400,000
Mercy Corps International (MCI)	Eritrea	8/14/01	17,430	$8,841,361	35,000
MCI	Kyrgyzstan	8/03/01	5,440[b]	$5,169,168	20,000
Mercy USA (MUSA)	Albania	12/10/01	10,000	$4,584,836	60,000
Project Concern International (PCI)	Bolivia	8/23/01	8,950	$7,107,677	120,000
PCI	Nicaragua	3/16/01	3,960	$2,059,722	19,200
Save the Children (STC)	Uganda	8/24/01	640	$849,135	5,000
World Share (WS)	Guatemala	8/06/01	20,980	$3,661,139	90,000
Total PVOs (25)			**379,130**	**$121,083,718**	**2,154,000**

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Implementing partners	Recipient country	Date of agreement	Estimated tonnage for project[a]	Estimated project cost[a]	Number of beneficiaries
World Food Program:					
WFP projects approved by WFP's executive board[b]	Bhutan	4/18/01	1,750	$880,902	17,500
	Bolivia	5/02/01	7,880	$1,917,890	102,000
	Cambodia	3/16/01	1,660	$818,448	100,000
	Cameroon	5/02/01	1,058	$410,588	49,000
	Chad	4/28/01	1,170	$1,342,682	43,600
	Colombia	3/16/01	3,655	$758,298	30,000
	Cote d'Ivoire	3/21/01	700	$313,185	200,000
	Dominican Republic	4/18/01	310	$137,300	115,000
	El Salvador	5/23/01	9,040	$2,707,376	175,800
	Ethiopia	4/26/01	3,990	$2,504,174	130,000
	Gambia	3/27/01	900	$444,557	37,500
	Ghana	3/27/01	1,065	$544,488	12,900
	Guinea	3/23/01	150	$101,200	82,000
	Honduras	5/18/01	9,450	$3,348,209	164,000
	Kenya	4/19/01	68,500	$29,684,445	1,362,000
	Kenya	6/18/01	2,400	$638,544	47,400
	Mozambique	4/12/01	2,300	$1,337,831	56,800
	Nepal	4/26/01	200	$139,495	250,000
	Nicaragua	3/16/01	970	$474,432	80,000
	Nicaragua	5/17/01	14,960	$9,156,468	351,000
	Peru	5/15/01	10,000	$2,589,400	137,600
	Tajikistan	3/23/01	380	$193,467	16,100
	Tanzania	5/23/01	2,050	$956,362	61,300
	Uganda	3/16/01	6,060	$3,621,898	66,000
Total[c] approved (25[d])			151,818	$65,980,230	3,638,000
Expansion proposals subject to executive board approval[b]	Bhutan	7/03/01	1,070	$583,561	28,500
	Chad	8/03/01	3,170	$2,053,200	87,400
	Ethiopia	7/03/01	6.940	$5,130,872	233,700
	Gambia	7/13/01	2,570	$1,923,249	112,500
	Mozambique	6/28/01	6,500	$3,952,469	170,300
	Nepal	7/03/01	5,962	$4,726,256	537,000
	Pakistan	8/03/01	5,860	$5,785,880	175,800
	Tajikistan	8/09/01	4,080	$2,341,519	172,700

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Implementing partners	Recipient country	Date of agreement	Estimated tonnage for project[a]	Estimated project cost[a]	Number of beneficiaries
Total expansion (8[d])			36,152	$26,497,006	1,517,900
Total WFP (33[d])			**187,970**	**$92,477,236**	**5,155,900**
Grand total			**629,300**	**$227,708,737**	**8,309,900**

[a]USDA estimates as of February 21, 2002, for WFP projects and December 11, 2001, for other projects.

[b]At the time when WFP submitted its proposals to USDA.

[c]Does not include a late fiscal year 2002 shipment of 2,350 metric tons.

[d]Some projects involve multiple commitments. The United States approved 34 WFP proposals covering 27 WFP projects in 23 countries. Of the 34 proposals, 8 were for expansions of already existing school feeding projects. The United States approved two different projects each for Guinea, Kenya, Nicaragua, and Uganda. As of February 21, 2002, USDA and WFP were still negotiating the terms of the second project for Guinea, and no figures for this project are shown in the table.

The World Food Program's Role in School Feeding and Food for Education

The World Food Program (WFP), set up in 1963, is a major U.N. agency in the fight against global hunger. In 2000, WFP fed 83 million people in 83 countries, including most of the world's refugees and internally displaced people. It shipped 3.5 million tons of food; received $1.75 billion in donations; and had operational expenditures of $1.49 billion (provisional figures).[84]

WFP provides three basic kinds of food aid: (1) emergency assistance to cope with the adverse food effects of natural disasters, civil conflict, and war; (2) protracted relief or rehabilitation aid to help people rebuild their lives and communities once the causes of emergencies recede; and (3) development assistance that aims to make communities food secure so they can devote time, attention, and work to escaping the poverty trap. When WFP was founded, its food assistance primarily focused on development, and for years development projects accounted for more than two-thirds of its expenditures. However, during the past 15 years, WFP has become increasingly involved in responding to humanitarian emergencies. According to WFP officials, WFP devoted 28 percent of its resources to development in 1997, 18 percent in 1999, and only 13 percent in 2000.

WFP relies entirely on voluntary contributions to finance its projects. Governments are the principal source of funding, but corporations, foundations, and individuals also contribute. Donations are made either as cash, food (such as grains, beans, oil, salt, and sugar), or the basic items necessary to grow, cook, and store food—kitchen utensils, agricultural tools, and warehouses. Since it has no independent source of funds, WFP's Executive Board has mandated that all food donations, whether in cash or in-kind, must be accompanied by the cash needed to move, manage, and monitor the food aid.

WFP has been running school feeding programs for nearly 40 years. In 1999, it operated 76 school feeding projects in 48 developing countries. These included 33 emergency or protracted relief projects that had 5.28 million beneficiaries and 43 development projects that had 5.85 million beneficiaries. Thus, total beneficiaries were 11.13 million. In 2000, WFP operated 68 projects in 54 countries, with a total of 12.27 million beneficiaries. According to WFP, the total expenditure for its school

[84]Donation and expenditure data as reported in WFP *Annual Report of the Executive Director: 2000*, Apr. 18, 2001.

feeding operations in 2000 was approximately $421 million. About $239 million was for development projects focused on school feeding, and the remainder was for school feeding components of emergency or protracted relief and recovery operations.

WFP welcomed President Clinton's July 23, 2000, announcement of the $300 million pilot program to launch a universal school feeding program, noted that it had been working closely with the U.S. ambassador to the U.N. Food Agencies in Rome to assist in the creation of such a program, and expressed the hope that the initiative would become a permanent feature of the global community of nations. A few days later, WFP's executive director, in testimony before a U.S. Senate committee, said a global program needs to be managed by a global organization and WFP, as the food aid arm of the U.N., was uniquely qualified to manage the initiative.[85]

Regarding its role in implementing a global program, WFP has said that much could be done to strengthen the education system in many developing countries.[86] According to WFP, this a highly complex task, one for which food aid is not the most effective resource.[87] WFP's approach will be to use food aid where the food is needed. WFP does not propose to monetize food commodities to fund related educational support activities. WFP will monetize only to effect an exchange between donated commodities and locally grown foods when this is cost effective and does not have an adverse effect on local markets. At the same time, WFP recognizes that while school feeding can bring children to school and help them learn while they are there, school feeding does not ensure qualified teachers, books and supplies, or a suitable curriculum. According to WFP, this is the role of national governments, often supported by international organizations or Private Voluntary Organizations (PVO); and the relationship between improvements in an education system and a national system of school feeding is one that must be managed by governments.

[85]Statement of Catherine Bertini before the Committee on Agriculture, Nutrition and Forestry, U.S. Senate, July 27, 2000. WFP has characterized its involvement in GFEI as the "World School Feeding Initiative."

[86]WFP, "The World School Feeding Initiative: WFP's Framework for Action," August 2000.

[87]According to WFP, monetization is an inefficient use of food resources. Until school children's hunger is alleviated, monetization of foodstuffs is not the answer. In addition, WFP told us that WFP's general policy not to monetize commodities is out of concern about disrupting commercial trade either internationally or in developing countries with relatively fragile agricultural sectors.

However, within the broad framework of government cooperation, WFP said, it is eager to work with other operational partners and experienced in doing so.

Underfunding of Projects

WFP told us that many of its school feeding projects have shortfalls.[88] Funding for all components of approved projects, including current school feeding programs, depends on the level of contributions received. When and where possible, WFP will allocate unearmarked donations to underfunded projects, taking into consideration the urgency of the need and a need to comply with the executive board's approved allocation formula.

According to WFP, it usually is not technically feasible to identify how many children were not fed due to under-resourcing. An unstable resourcing situation often compels project managers to temporarily adjust the on-site ration size or the number of food distribution days, rather than reducing the number of beneficiaries, it said. When under-resourcing is of a more permanent nature, the project plan is revised and a formal change in the beneficiaries occurs.

WFP'S Approach to Certain Key Factors Associated with Effective School Feeding Programs

WFP has developed several documents that describe its policies for establishing school feeding programs and which guide the project development and approval process for all WFP school feeding activities.[89] The following is a brief summary of some of the points presented in these documents, or provided directly to us by WFP in response to questions that we provided to the agency, regarding certain key factors associated with their school feeding programs.

- Targeting—The focus of WFP's world school feeding initiative is on feeding preschool and primary school age children. On an exceptional basis, food aid activities designed to encourage girls to continue their

[88]Although WFPs' development and protracted relief and recovery projects are reviewed and approved by its executive board, the approval for a project does not mean that all requested resources will be contributed by donors. According to a WFP official, on average, WFP programs are funded at about 70 percent of their requirements.

[89]Two key examples are the following. World Food Program, UNESCO, & World Health Organization, *School Feeding Handbook* (Rome, Italy: 1999). WFP, "The World School Feeding Initiative: WFP's Framework for Action."

education beyond primary school will be considered. Some fundamental issues to be examined in determining the problems to be addressed are (1) enrollment and dropout rates in primary education broken down by gender, region and sociocultural groups, to the extent possible, and factors explaining these rates; (2) extent of, and factors contributing to, short-term hunger; (3) average distances walked by the students, who will be covered in the school feeding activity, between their homes and their school; and (4) cultural practices affecting enrollment/attendance, especially of girls.

As a general rule, targeting within school feeding projects will be conducted at the level of geographic areas, with no selection of individual pupils within schools. The only exception for this may be when the effectiveness of an incentive for a particular category (e.g., girls) can be demonstrated. According to WFP, it requires at least 50 percent of its resources in education to be targeted for girls, and WFP has been very successful in achieving this requirement.

WFP has a vulnerability analysis and mapping unit (VAM) to identify people most vulnerable to hunger and to target their needs. According to WFP, VAM uses state of the art satellite imagery of rainfall and crop conditions, as well as monitoring of food prices in local markets. WFP has VAM sub-units in more than 50 developing countries. According to WFP, this system is also used in targeting its school feeding programs.

- Facilitative learning environment—WFP told us that it does not require a facilitative learning environment to be in place or provided as part of its programs, but such an environment is highly desired and encouraged. According to WFP, the presence of school feeding in schools helps bring attention to other school conditions (e.g., classrooms, materials, sanitary facilities, teachers, curricula, and health conditions) and, in turn, helps WFP and its partners to bring attention to problems and attract other needed resources.

- Safe water and sanitation—WFP guidelines say basic water supply and sanitation standards must be met if food is to be safely stored and prepared for school feeding, and safe water supply should be available on the school premises at all times. WFP provides detailed information on optimal and minimal standards for a safe water supply and sanitation at schools. However, WFP told us it does not require safe water and sanitation facilities to be in place in order to implement school feeding in a given school and, as a rule, does not provide water and sanitation

facilities. However, WFP said, it does work with the national and local governments and with other U.N. agencies, donors, and nongovernmental organizations who have the appropriate skills and resources to "trigger" action where the lack of such facilities is a problem.

- Deworming treatments—According to WFP guidelines, WFP will generally support deworming in a school feeding program when more than 50 percent of the children have intestinal parasites. Treatment is with a single dose of the proper medicine, up to three times a year, and should be combined with improved sanitation and safe water supply, as well as health education on prevention. In April 2001, WFP told us that it did not yet have complete information regarding which of its school feeding programs had already initiated deworming activities (due to decentralized decision-making and no prior requirements for reporting such information). However, WFP said it did know that most or all of its school feeding operations in Latin America and the Caribbean and two or more in Asia had at least implemented limited deworming activities. WFP estimated that by the end of 2001, it would have initiated deworming in its school feeding programs in 15 or more countries, in partnership with WHO and the World Bank, and assisted, in part, by a Canadian grant. WFP said that it hopes to achieve deworming activities in most or all GFEI, as well other WFP school feeding operations. WFP also noted that national, regional, or local governments may require deworming to be in place.

- Micronutrient supplementation—WFP guidelines note that school feeding can be a vehicle for micronutrients in countries where school children are affected by and/or at high risk of developing micronutrient deficiencies. WFP provides information on micronutrient deficiencies that have been shown to affect school attendance and performance, recommended levels of intake of these micronutrients for 3- to 12-year old children, and guidance on how to use them in school meals. WFP told us that micronutrient supplementation is most often handled as an additive to the commodities that are distributed. In cases where the commodities that arrive are not fortified, WFP most often works locally to fortify the food or seeks other remedies. WFP collaborates with groups that have expertise and resources to bring to bear, especially UNICEF, WHO, a Canadian micronutrient initiative, and certain NGOs. WFP noted that national, regional, or local governments may require micronutrient supplementation to be in place.

- Health and nutrition education—WFP told us that this is not strictly required in all WFP school feeding operations. However, such activities are highly encouraged, are frequently planned and implemented, and will be further strengthened through collaboration with appropriate partners and coworkers on the ground. WFP noted that national, regional, or local governments may require health and nutrition education to be in place.

- Community and parental participation—WFP told us that community and parental participation are not strictly required in all WFP school feeding operations. However, WFP said, such activities are highly encouraged,[90] are frequently planned and implemented, and are and will be further strengthened through collaboration with appropriate partners and coworkers on the ground. WFP noted that its data indicates that as girls' enrollment and attendance increases, so does parental participation. WFP also noted that national, regional, or local governments may require parental involvement to be in place.

- Education for All—WFP expects recipient governments to have demonstrated a commitment to Education for All.

- Sustainability—WFP requires that plans be in place for eventual take-over of a feeding program by recipient countries. WFP generally insists that programs be supported by national governments and local communities and that resources and infrastructure be provided as counterpart contributions. However, WFP will consider providing school feeding activities in some emergency and protracted relief situations where full government support is not possible. In addition, for low income countries, it is probably necessary to provide most or all of the food commodities, technical assistance, and equipment.

  According to a WFP official, sustainability depends on the economic status of the recipient country. There are countries where the national government has been able to take over a program. However, in the poorest, least developed countries, he said, sustainability is only possible where there is substantial community involvement. In many

[90]According to WFP, as a general rule, the essential services required for operating a school feeding program—cooks, kitchen helpers, guards—should be covered by the community, either by providing such services itself or by contributing cash to compensate those engaged to perform the services. Beyond that, broader community participation will be built into projects wherever feasible.

least developed countries, government expenditure on the education sector often represents up to 30 percent of the national budget; it is difficult enough for such countries to maintain the physical infrastructure and teachers. For least developed countries, sustainability is a long-term process. A realistic estimate is 10 to 15 years, he said.

Monitoring and Evaluation

WFP officials told us that there had been some problems in the past, but WFP is working hard to overcome them for both the U.S. pilot program and its other school feeding activities. As an example of problems, collection of baseline date had varied, depending on the country, the specific goals of the school feeding activity, and the resources available. Principal performance indicators that WFP tended to use were increased enrollment and attendance, reduced dropout rates, and improved performance (such as number of students who had completed primary school the previous year and gone on to higher education). WFP had looked at these indicators, especially as they relate to girls' education, and had been able to report some notable successes. However, WFP had only done that in isolated cases/countries. Therefore, WFP intends under GFEI to standardize the indicators and upgrade its monitoring and evaluation systems so as to be able to regularly collect and report comparable and up-to-date data for its school feeding operations. WFP also said that data collection and analysis in developing countries is challenging and requires additional resources and capacity building of national counterpart staff.

WFP's guidelines for its new World School Feeding Initiative require a baseline monitoring study to establish the situation prior to the onset of the initiative, followed by periodic updates as a program is implemented.[91] To this end, WFP developed a detailed survey instrument for collecting baseline information on its GFEI-funded projects. The survey was pilot-tested in August 2001, and WFP conducted the surveys in a sample of

[91]In addition, WFP's guidelines require in-depth reviews of activities in a sampling of countries and on specifically identified issues of interest to WFP, the beneficiary countries, and/or donors.

schools[92] for all of the U.S. pilot program projects before the end of 2001 (details of the survey instrument are discussed in the letter).

In addition, according to WFP, during 2001, it developed and successfully pilot-tested a new system of collecting key monitoring data on a timely basis directly from the schools involved in its feeding programs. The system involves school staff entering key data directly into devices, installed at the schools, that transmit the data via satellite to a data collection center in France, using the ARGOS satellite system (that is jointly managed by the governments of France and the United States). Country data is then reported from the data collection center to the country's relevant ministry of education and to WFP. WFP is seeking donors to fund implementation of the system.

WFP also conducted a major, global survey of national school feeding programs (not specific projects) between May and December 2001. The survey collected information on countries' school feeding programs and related information on their demography; education system; nongovernmental program assistance; health-related education services at school; and evaluations, studies, and surveys about school feeding and related topics. According to WFP, the survey provides a focal point for school feeding information, which WFP will use to promote dialogue with governments and nongovernmental organizations concerning the use of food aid for education and related issues. WFP will also use the data to produce special reports and identify country specific needs and coordinate partnerships between countries with experience in school feeding and those in need. WFP is posting country-specific results on its Web site. WFP is seeking donors to fund installation of the system in its schools.

Regarding evaluations, WFP's central evaluation office generally does not conduct separate evaluations of the school feeding projects that WFP assists. (Occasionally separate evaluations of school feeding projects are undertaken if specifically requested by the executive board.) WFP mandates that evaluations of its country programs[93] be conducted about

[92]According to USDA, WFP planned on sampling a total of 3,700 schools in 23 countries, or roughly 161 sample schools per country. Actual country sample sizes were to range from 60 to 388 schools.

[93]A country program includes the different projects that WFP sponsors within a country. For example, a country program might include a school feeding program, a maternal/child health and nutrition program, and a food-for-work program.

every 4 years, on average. The evaluations are submitted to WFP's Executive Board for review. If a country has a school feeding project, the project's role, relevance, and performance as an activity is to be included in the review.

Results from Review of Experts' Findings and Views on School Feeding Programs

This appendix provides additional information on our review of experts' findings and views concerning (1) the effect of school feeding programs on enrollment and attendance, (2) the effect of school feeding programs on educational performance or learning, and (3) key factors contributing to effective school feeding programs (see tables 4 and 5). It also provides further information on key factors associated with effective school feeding programs (see tables 6 through 10). (See also app. V, which discusses the costs and cost effectiveness of school feeding programs.)

Our review relied considerably on the views of two experts who have reviewed the results of many school feeding program studies;[94] WFP, which has conducted school feeding programs for 4 decades and also reviewed the results of other studies;[95] and the summary views of a meeting of experts and practitioners held at USAID in October 2000.[96] We also conducted literature searches, reviewed the results of individual studies on school feeding programs, and spoke with experts and practitioners.

Table 4 summarizes the results of studies and expert views on the relationship between school feeding and school enrollment and attendance.

[94]See, for example, statement of Beryl Levinger before the Committee on Agriculture, Nutrition and Forestry, U.S. Senate, July 27, 2000. Joy Miller Del Rosso, *School Feeding Programs: Improving Effectiveness and Increasing the Benefit to Education: A Guide for Program Managers*, (World Bank: August 1999).

[95]World Food Program, *Operational Guidelines for WFP Assistance to Education*.

[96]School Feeding/Food for Education Stakeholders' Meeting, Oct. 3, 2000.

Table 4: Results From Selected Studies and Experts on the Impacts of School Feeding Programs on Enrollment and Attendance

Country	Finding	Source[a]
Bangladesh	Student enrollment in schools with a food for education program increased by 35 percent immediately after the program was introduced, while enrollment in other schools increased by about 7 percent. The overall rate of school attendance was 71 percent in schools with the program and 58 percent in other schools.	IFPRI, 2001
Developing countries (generally)	Properly designed and effectively implemented school feeding programs (SFP) can motivate parents to enroll their children in school and have them attend regularly.	Del Rosso, 1999
Developing countries (generally)	Review of literature prior to 1986--SFPs seemed to make a difference in enrollment and attendance when there was a good fit between the design of the program and the environment in which it operates.	Levinger, 1986
Developing countries (generally)	Cites several studies of programs that have increased enrollment or lowered absenteeism and dropout rates.	Whitman et al, 2000
Developing countries (generally)	SFPs have the advantage of bringing children into school in a way that other interventions (e.g., safe water and sanitation and health packages) do not. Under the right circumstances, favors feeding to get and keep children enrolled in school.	Levinger, 2001
Developing countries (generally)	The evidence strongly suggests that SFPs can increase attendance rates, especially for girls, and that school feeding or take-home rations serve as incentives for enrolling children in school and encouraging daily attendance.	Stakeholders, 2000
Developing countries (generally)	SFPs can be effective in increasing attendance and enrollment. However, they may not overcome other factors that lead parents to keep their children at home, such as poverty, a lack of roads to the school, or perceptions of low school quality.	World Bank, 2001
Developing countries (generally)	Most research, despite limitations in design and validity of findings, supports a positive effect of school feeding programs on school attendance and enrollment.	World Food Program, 1999
Dominican Republic	Up to 25 percent of children—especially children from rural areas and girls—dropped out of school during a period without a school feeding program.	King, 1990
Jamaica	SFP had no discernible effect on school attendance.	Chambers, 1991
Kenya	The hypothesis that children in a school with a lunch program would have better nutritional status and school attendance compared with a school without a lunch program was not confirmed.	Meme et al, 1998
Malawi	Small pilot school feeding program over a 3-month period led to a 5 percent increase in enrollment and up to 35 percent improvement in attendance.	WFP, 1996
Pakistan	Providing one or two tins of oil to families whose girls attended school for 20 days per month improved enrollment by 76 percent in participating schools, compared with 14 percent in the province overall. Attendance increased from 73 percent to 95 percent among participants.	WFP, 1995 (b)
Cape Verde, Gambia, Mauritania, Niger	Impact of school canteens on enrollment was difficult if not impossible to determine. However, impact on attendance was easily and statistically ascertainable.	WFP, 1995 (c)
India	Results suggest that the program did not positively affect aggregate enrollment but had a positive impact on attendance and drop-out rates.	Rajan & Jayakumar, 1992

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of the literature.

Table 5 summarizes the results of several studies and expert views on the relationship between school feeding and school performance.

Table 5: Results From Selected Studies and Experts on the Impacts of School Feeding Programs on Learning

Country	Finding	Source[a]
Benin	Children in schools with food services scored significantly higher on second-grade tests than did children in schools without food services.	Jarousse & Mingat, 1991
Burkina Faso	In 22 of 30 provinces, the success rate on a national exam for sixth grade pupils was higher for schools that had school feeding. The eight exceptions were for schools in moderate or better-off provinces.	Moore, 1994
Chile	Studied 279 children, from low socioeconomic background—and categorized as normal, wasted, or stunted—on the effects of breakfast omission on cognitive performance. No consistent association was found between study condition and performance in short-term visual memory, problem solving, and attention tasks in any of the three nutritional groups. Results suggested that given a motivating short-term task and maintaining routine conditions, missing breakfast does not affect the cognitive performance of children.	Lopez et al, 1993
Chile, Jamaica, Great Britain, Peru, United States	Selective review of the literature on the effects of breakfast on cognition and school performance after 1978 and before 1995. In at-risk subjects (defined by clinical history and anthropometry), a morning and overnight fast had adverse effects on cognition. Contradictions in the data from different studies prevent definitive conclusions on whether well-nourished children experience functional deficits. Well-conducted evaluations suggest the availability of feeding programs in public schools throughout the academic year increases the probability that children will eat breakfast and improve their educational status.	Pollitt, 1995
Developing countries (generally)	The impact of SFPs on meeting educational objectives is uncertain, since little work evaluating them has been done. However, experience shows that properly designed and effectively implemented SFPs can alleviate short-term hunger in malnourished or otherwise well-nourished schoolchildren. This effect helps to increase students' attention and concentration, producing gains in cognitive functioning and learning.	Del Rosso, 1999
Developing countries (generally)	The level of a student's cognitive performance is, in part, a function of the adequacy of his diet. However, meaningful cognitive development will occur only when a facilitative learning environment is present to complement the food a child receives.	Levinger, 2000
Developing countries (generally)	Evidence for the positive effect of preschool nutrition programs on educational performance, particularly when the programs reach very young children, is quite strong and there is strong evidence for an impact on school performance of nutrition interventions targeting short term hunger, especially breakfast or mid-morning snack programs. At the same time, schools need adequately trained teachers, motivational textbooks, and other learning materials for adequate learning to take place.	World Bank, 2001
Developing countries (generally)	The existing literature on the effects of school feeding on education is not fully conclusive. Although studies based on an appropriate experimental design usually succeed in capturing the positive effects of school feeding, most of the ordinary field evaluations of SFPs seem to be too crude to yield significant results. Sufficient evidence does exist to suggest that school feeding can enhance children's cognitive function by offsetting the effects of short-term hunger, especially among already undernourished children.	World Food Program, 1999
Developing countries (generally)	Only when hunger is addressed and the child is in school can other factors--such as the quality of the teaching--become relevant. For a child who attends school but is hungry, it does not matter whether the schools are stimulating settings that encourage development and learning.	World Food Program, 2000

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Country	Finding	Source[a]
India	Problems of malnutrition and health could not be overcome by a school meal program, which provided less than 15 percent of the recommended daily allowance for calories. However, the program did improve school attendance and academic performance, as well as reduce the dropout rate.	Agarwal et al, 1987
Jamaica	Study examined the effects of omitting breakfast on the cognitive functions of three groups of children: stunted, nonstunted controls, and previously severely malnourished. Results indicated that cognitive functions are more vulnerable to missing breakfast in poorly nourished children.	Simeon & Grantham-McGregor, 1989
United States and other countries	Though not definitive, existing research suggests that omitting breakfast affects performance of specific cognitive tasks, particularly those involving memory. Effects appear more pronounced after a period of fasting and in more vulnerable subgroups of children, such as those nutritionally at risk. Long-term assessments of breakfast omission and cognitive function have not been conducted. Studies on the U.S. school breakfast program could not definitively conclude that participation in this program caused improvements in either long- or short-term cognition and school performance. The inconclusive findings reflected limitations in the studies themselves.	Briefel et al, 1999; Ponza et al, 1999

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of the literature.

Table 6 provides results and views on how targeting factors can affect school feeding program effectiveness. Ways to target programs include focusing on areas/communities that are (1) low-income and food insecure, (2) have relatively low levels of school enrollment and attendance, and (3) where girls' enrollment and attendance are considerably lower than boys'.

Table 6: Targeting Factors and School Feeding Program Effectiveness

Targeting factors	Source[a]
Target programs on areas/communities with relatively low school enrollment and attendance rates	
• A food ration provided to only poor households who sent their children to food-for-education primary schools, in Bangladesh. Enrollment rates increased by 20 percent; attendance rates increased from 63 to 78 percent; dropout rates fell from 19 percent to 11 percent. Results were statistically significant when compared to non-food-for-education schools.	Ahmed & Billah, 1994
• Best practices for SFPs include targeting countries or regions with lowest enrollment/attendance statistics.	Nazaire, 2000
• The target for SFPs is where the proportion of children enrolled is low or the percent that leave school early is high.	Levinger, 2001
• Targeting the most underserved, food insecure areas, with relatively low rates of school attendance and where reasons for lack of attendance relate to lack of income and not lack of a facility, seems to make the most sense.	Stakeholders, 2000
• Experience indicates SFPs have generally been successful in providing an incentive for families to send children to school, but it is unclear whether SFPs alone have helped to increase enrollment overall. Studies show that unless SFPs are targeted properly, enrollment will increase at schools that provide SFPs, yet decrease in surrounding, non-SFP schools.	Janke, 1996
Target programs on low-income areas	
• Targeting SFPs to poorest and most insecure families has proved problematic. Past research has indicated that children attending primary school are more likely to come from less vulnerable backgrounds, suggesting that SFPs may even discriminate against the neediest. To be successful, targeting systems must use truly needs-based criteria.	Pillai, 2000
• Best practices for SFPs include targeting low-income, food-deficit countries and regions where the principal reason children do not enroll in or attend school regularly is economic; or where primary school children arrive at school hungry.	Nazaire, 2000
• Targeting is essential if SFPs are to reach families and communities that lack the resources to adequately provide for their school-age children or that need to be motivated to enroll their children in school and have them attend more regularly. Pressure to maintain almost universal coverage in Gambia has resulted in a less effective WFP SFP.	Del Rosso, 1999
• It may be possible to alleviate hunger in schoolchildren without an SFP. Encouraging and educating parents to feed their children before sending them to school or to provide a bag lunch or money for them to purchase food at school may be an appropriate objective.	Del Rosso, 1999
Target programs on areas where girls' enrollment and attendance are considerably lower than boys'	
• Best practices for SFPs include giving priority to countries/regions where girls and minority groups have traditionally been marginalized from access to primary education.	Nazaire, 2000
• School-based food distribution has been used successfully to improve enrollment and attendance among school-aged children, particularly girls.	Del Rosso, 1999
• In India, an SFP attracted more girls to school and improved the attendance of those already in school.	Devadas, 1983
• A study of four long-term WFP projects in West Africa found that school feeding alone could not be viewed as a motive for sending girls to school if, because of sociological prejudices, their parents were not convinced of the usefulness of giving them an education. Sensitization programs on the importance of education for girls were recommended to be used in association with the programs.	WFP, 1995 (c)

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of literature.

Table 7 provides results and views on how learning environment factors can affect school feeding program effectiveness, including ensuring adequate numbers of teachers, teacher training, supplies of textbooks and other learning materials, and school infrastructure.

Table 7: Learning Environment Factors and School Feeding Program Effectiveness

Learning environment factors	Source[a]
Ensure adequate numbers of teachers, including for responding to expected increase in student enrollment and attendance	
• Best practices for SFPs include targeting primary schools where quality teaching is taking place and the learning environment is positive or interventions are being implemented to ensure this becomes the case.	Nazaire, 2000
• In the face of deteriorating education infrastructures and the shortage of qualified teachers and materials, food aid agencies are increasingly compelled to examine, not only their effectiveness at getting children to school, but also their effectiveness in helping children maximize their time there.	Janke, 1996
• Evidence strongly suggests that SFPs can increase attendance rates, especially for girls, but this is likely a short-term solution; if there is no change in the quality of schooling, attendance will likely drop once the food incentive is removed.	Stakeholders, 2000
• In Bangladesh, the quality of education was lower in schools with a feeding program than in nonfeeding schools largely because enrollment was greater in the former. Student achievement test scores were slightly lower in schools that received the food aid.	IFPRI, 2001
Provide adequate teacher training	
• Poorly trained teachers provide a strong disincentive to students and their families.	Janke, 1996
• Improvements in child learning only come when a facilitative learning environment is present to complement the food a child receives. A facilitative learning environment is one in which teachers are trained to engage children as active learning partners in stimulating learning tasks.	Levinger, 2000
• The drive for Education for All highlights the need for quality, in terms of relevance and academic performance, and for providing a school environment which encourages children to learn how to improve their lives.	UNESCO, 2001
Ensure adequate supplies of textbooks and other learning materials	
• Inappropriate curricular materials are a strong disincentive to students and their families.	Janke, 1996
• A facilitative learning environment requires minimal supplies, including blackboards, desks, and chairs. Without these components, programs may increase enrollment in what in reality will be poorly administered day care centers.	Levinger, 2000
• Educational achievement is believed to be strongly determined by factors such as the availability and quality of textbooks and other learning materials.	UNESCO, 2001
• Access to books and other learning materials is the most cost-effective means of raising the level of educational achievement. Textbooks are a rare commodity in most developing countries.	UNESCO, 2001
Ensure adequate classroom space, desks and chairs, lighting, and heating/cooling	

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Learning environment factors	Source[a]
• Dilapidated school buildings provide a strong disincentive to students and their families. Among best practices is school infrastructure improvement initiatives.	Janke, 1996
• A facilitative learning environment requires a suitable physical environment, including blackboards, desks, and chairs. Many schools have no blackboards, chairs, or desks and frequently no classrooms.	Levinger, 2000; Stakeholders, 2000
• In Yemen, especially in areas where girls' enrollment is low, communities are constructing new classrooms, contributing financially, and providing labor for the building.	UNICEF, 2001

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of literature.

Table 8 provides results and views on how health and nutrition factors can affect school feeding program effectiveness, including through treating intestinal parasitic infections, ensuring clean water and adequate sanitation facilities, addressing micronutrient deficiencies, and ensuring health and nutrition education.

Table 8: Health and Nutrition Factors and School Feeding Program Effectiveness

Health and nutrition factors	Source[a]
Treat intestinal parasitic infections	
• In 1989, an examination of the global distribution of parasitic worm infections revealed that large parasitic burdens were associated with impaired cognitive function as well as absenteeism, underenrollment, and attrition.	Bundy & Guyatt, 1989
• In the West Indies, a single chemotherapy treatment for whipworm infection, given to children at school without nutritional supplements or improvements in education, improved the children's learning capacity to the point that their test scores matched those of children who were uninfected.	Bundy & Guyatt, 1989
• In Jamaica, a double-blind placebo trial was conducted to determine the effect of moderate to high loads of whipworm infection on the cognitive functions of 159 school children. Results suggest that whipworm infection has an adverse effect, which is reversible by therapy.	Nokes et al, 1994
• Mass treatment of parasitic infections given to children in their schools is considered a powerful tool for improving health.	UNDP, 1992
• To maximize benefits, SFPs should be integrated, when relevant, with intestinal worms control programs. Conclusive evidence exists on the nutritional and educational benefits of relatively inexpensive deworming interventions.	WFP, 1995 (a)
Ensure clean water and adequate sanitation facilities are present	
• Education about water/sanitation/hygiene in schools can encourage the construction of facilities and their subsequent use in school and in the community.	Hubley, 1998
• Without clean water and adequate sanitation facilities, schools may be a major disease vector, and hygiene education is meaningless. By providing clean water and sanitation, schools can act as an example to both students and the wider community.	Levinger, 2000

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Health and nutrition factors	Source[a]
• Inadequate sanitation and water in schools jeopardize not only students' health but also their attendance. Girls in particular are likely to be kept out of school if there are no sanitation facilities.	Khan, 1997
• Safe water supply should be available on the school premises at all times.	WFP, 1999
Address micronutrient deficiencies	
• In Ghana, iron supplements for 6 weeks led to a significant improvement in school performance, compared with a placebo group.	Berg, 1999
• In China, iodine supplementation brought the average hearing capacity of iodine-deficient schoolchildren close to that of non-iodine-deficient children.	Berkley & Jamison, 1991
• SFP integrated a 6-month dose of an anti-parasite, vitamin A, and daily iron supplements. Results included substantial reduction in parasitic infection, decline in vitamin A deficiency, and improvement in children's growth.	Gopaldas & Gujaral, 1996
• Nutritional interventions such as micronutrient supplementation and treatment of intestinal worms helped increase student's attention, cognitive problem solving, and test scores.	Whitman et al, 2000
• School aptitudes among three- to six-year-old children are affected by iron-deficiency anaemia. These effects continue into the school period if the nutritional deficit is not corrected. There are no data to support the contention that cognitive deficits observed among pre-schoolers will persist after appropriate treatment. Chronic iron-deficiency anaemia during the pre-school period will have cumulative adverse effects on learning variables that interfere with school performance.	Pollitt, 1990
• In India, study of the impacts of iron supplementation on 163 anemic girls; significant improvements in cognitive function scores after 8 months.	Seshadri & Gopaldas, 1989
• In Malawi, when the diets of primary school children were supplemented with iron as well as iodine, the gain in IQ scores was greater than with iodine supplementation alone.	Shrestha, 1994
Ensure adequate health and nutrition education	
• Clinical trials show a critical link between learning and schoolchildren's health and nutrition. Education that addresses specific nutrition and health practices is a critical element of SFPs and helps to complement and sustain the benefits of deworming and micronutrient supplementation, which will in turn increase the benefits of SFPs.	Del Rosso, 1999
• Schools can, with community participation, provide the necessary learning experiences to encourage children to practice good hygiene in school, in their community, and later in life.	Hubley, 1998
• Experience in a number of countries has shown that unless collaborating education institutions include nutrition and hygiene information in the curriculum and provide teachers with adequate training in these areas, the additional hygiene and nutrition education focus of SFPs has little impact.	Janke, 1996
• Nutritional deficiencies (e.g., vitamin A and iodine deficiency) and health problems, such as parasitic infections and malaria, affect school participation and learning. Most of these issues can be addressed effectively through health, hygiene, and nutrition policies and programs for students and staff.	Whitman et al, 2000
• To enhance the impact of SFPs on children's learning, the programs should be part of a larger school health and nutrition intervention. Possibilities include, among others, offering health/nutrition education.	WFP, 1995 (a)
Ensure nutrient content of meals addresses nutritional needs of the student population	
• The nutritonal quality and quantity of a ration should always be assessed as well as the effects of the timing of the delivery. Other factors such as local food habits, logistical considerations, food availability, and food cost will also affect the ration selection.	Del Rosso, 1999
• Best practices include meals of a sufficient size and composition to override potential losses from the meal substitution effect; and identifying the particular nutritional needs of the targeted population and providing meals that directly correspond to local need.	Janke, 1996

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of literature.

Table 9 provides results and views on how community and parental involvement can impact the effectiveness of school feeding programs.

Table 9: Community and Parental Factors and School Feeding Program Effectiveness

Community and parental factors	Source[a]
Involve the local community	
• SFPs can improve educational quality and efficiency by increasing community involvement in schools. Schools with community support are more effective.	Del Rosso, 1999
• Best practices include community participation in education through parent teacher associations (PTA), school infrastructure projects, and integrated income generation projects.	Janke, 1996
• Getting the community involved from the beginning and giving it ownership of SFPs greatly increase the chances for program success and sustainability. Parents see the need for feeding their children and want to help. Communities can assist in planning the program as well as preparing and distributing meals.	Stakeholders, 2000
• Promoting a positive interaction between the school and community is fundamental to the success and sustainability of any school improvement process. Community partnerships engender a sense of collaboration, commitment, and communal ownership. Such partnerships also build public awareness and demand.	UNICEF, 2000
• International and national education initiatives have focused on integrated school health and education interventions, including mobilization of parents and communities.	WFP, 1995 (a)
Involve parents	
• Africa has a wealth of community associations, including PTAs, that can be a channel for community participation and responsibility. Early involvement of such organizations in program development maximizes the community's commitment and sustainability.	Del Rosso & Marek, 1996
• Parental support and cooperation allow education about health to be shared and reinforced at home.	UNICEF, 2000
• SFPs probably do make a difference in enrollment and attendance if their design takes into account the environment in which they operate, including the importance of parent education and involvement.	Levinger, 1986

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of literature.

Table 10 provides results and views on the effect of government commitment and sustainability on the effectiveness of school feeding programs. Among the factors addressed are national government commitment to broad, national school reform programs, resource commitments by national governments and local communities, and plans for program sustainability.

Table 10: Government Commitment and Sustainability and School Feeding Program Effectiveness

Government commitment and sustainability factors	Source[a]
National government commitment to broad, national school reform programs	
• School feeding must take place within the context of broad, national school reform programs. These reforms should focus on other essential inputs to education and learning, such as teacher development, curriculum reform, and student assessment.	Stakeholders, 2000
• For WFP assistance, governments must demonstrate—through promulgation of policies, programs, and financial commitments within their means—that high priority is accorded to human resource development through basic education, as reflected in the World Declaration on Education for All.	WFP, 1999
Resources committed by national government and local communities	
• Aside from the costs of the food, SFPs have high costs associated with transportation, warehouses and distribution, and storage facilities. These costs are often borne by recipient governments. Human resources may be as much of a constraint as cash and physical facilities. Parent-teacher or other community associations can play a significant role and ultimately assume some of the costs.	Del Rosso, 1999
• For WFP assistance, programs must be supported by national governments and local communities, with a significant amount of resources and infrastructure provided as counterpart contributions.	WFP, 2000
• SFPs are expensive. On-site feeding is costly because it requires daily preparation and delivery of food; but it is also a model that can invite or require community participation.	Del Rosso, 1999
• Most parents, even in the poorest communities, are willing to provide whatever resources they can spare to support programs for their children, especially when those programs meet a need they recognize and value.	Young, 1995
Plan for achieving a self-sustaining program	
• It is unlikely that host governments would continue funding for most programs at the same level, if at all, were aid to be withdrawn.	Pillai, 2000
• The cost of school feeding is a major issue for both governments and donors. Feeding programs of any kind are expensive. Financing may include international assistance; but in all cases, available public resources, or the potential to draw on them, are required.	Del Rosso, 1999
• Even if project objectives are successfully achieved, their long-term sustainability will still be in doubt because of the high proportion of recurrent costs.	Pillai, 2000
• Little evidence exists to support the notion that participation of the community, beneficiaries, and government in programs will successfully transfer the responsibilities for funding and operating SFPs.	Select Committee on Hunger, 1987
• The choice of commodities for SFPs should be determined primarily by (1) the acceptability of the food to beneficiaries and (2) their cost, with a view toward ensuring takeover by governments and/or communities after the phasing out of assistance.	WFP, 1999
• From the beginning, host governments will be expected to contribute, within their means, and to put forward a realistic plan to gradually increase their contribution and eventually assume full responsibility (an "exit strategy").	WFP, 2000
• Maintenance and continuity of program activities, after outside assistance is phased out, are more likely when the participants have played an active role in designing and implementing the program. If they feel that the program is important and they share responsibility for making it work, they will ensure that the activities are continued.	Young, 1995

[a]See references at the end of this appendix for complete citations for the tables in this appendix.

Source: GAO review of literature.

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Costs of School Feeding Programs

This appendix discusses actual costs of school feeding programs as determined by two World Bank studies, as well as World Food Program (WFP) cost estimates of its programs and our own estimates of school feeding programs based on WFP guidelines and cost factors and other data. It also provides information on situations where school feeding programs may not be as cost-effective in promoting learning as certain other approaches.

Table 11 provides figures on the actual costs of more than 30 school feeding programs in 21 countries that were reported in two World Bank studies. Table 11 shows the annual cost of providing 1,000 calories per student on a daily basis for a 180-day school year; dollar values have been expressed in 2000 dollars. As the table shows, costs vary significantly, ranging from a low of $4.29 for one program to a high of $180.31 for another. All but four of the programs cost more than $23 per pupil, and the average cost for all programs was $58.66 per student. Cost differences can be due to a variety of factors, such as differing program objectives, type of food served, and costs in transporting the food to the country and, once there, to its final destination.

Table 11: Actual Costs of Various School Feeding Programs (Year 2000 Dollars)

Country	Per-pupil cost for a 180-day program, 1,000 calories per day	Country	Per-pupil cost for a 180-day program, 1,000 calories per day
Bolivia (food only)	$47.22	Honduras-two programs	$14.34
Bolivia-WFP	74.51	Jamaica	169.58
Bolivia-four programs	31.48	Madras-mid-day meal	77.91
Chile	126.65	Morocco-WFP	56.99
Colombia	51.52	Nepal (MCH and SFP)	33.23
Costa Rica	75.13	Panama	4.29
Dominican Republic	51.52	Paraguay	180.31
Ecuador- government	45.08	Paraguay	122.50
Ecuador- WFP	27.91	Peru-WFP	6.44
Ecuador- collection	35.93	Tamil Nadu-mid-day meal	39.41
El Salvador	77.28	Tunisia-WFP	61.57
Gambia	47.91	Uruguay	88.01
Guatemala	25.76	Venezuela-1(lunch)	25.76

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Country	Per-pupil cost for a 180-day program, 1,000 calories per day	Country	Per-pupil cost for a 180-day program, 1,000 calories per day
Guatemala	11.32	Venezuela-2 (snack)	23.61
Honduras	55.81	Venezuela-3 (milk)	70.84
Average cost of all programs			**$58.66**

Source: World Bank. "Feeding Latin America's Children: An Analytical Survey of Food Programs," Report No. 9526—LAC. Human Resources Division, 1991; and Horton, S. (1992) "Unit Costs, Cost-Effectiveness, and Financing of Nutrition Interventions," PHN Working Paper 952. World Bank, Human Development Department, Washington, D.C.

In April 2001, WFP officials told us they estimated the current average cost of WFP school feeding programs ranged between about $22 to $27 per student, for a 180-day school year. They said WFP did not have precise figures available on the average costs of its school feeding programs because it has not required data to be reported in the specific category of school feeding. Many large projects have a school feeding component, they noted, but are not entirely devoted to school feeding. Subsequently, in July 2001, WFP issued a paper that reported the average cost of its school feeding development projects in 2000 at 19 cents a day (or $34.20 for a 180 day program).[97]

We prepared a separate estimate of the cost of school feeding programs using some WFP guidelines and cost factors and other data. According to WFP, the recommended daily school feeding ration for full-time primary school students can range between 600 to 2,000 calories, depending on whether schools are half day, full day, or boarding. For day school, the recommended acceptable range is between 1,200 to 1,500 calories (i.e., 60 to 75 percent of the daily energy requirements of school-age children). The guidelines also indicate that a minimum of 10 percent of calories should be obtained from consumption of edible fats. In addition, the guidelines for day schools recommend that school feeding programs provide 28 to 36

[97]According to WFP, these costs are all inclusive, ranging from the values of all food aid commodities purchased by WFP, costs of transportation and monitoring, to internationally and locally recruited personnel. In February 2002, WFP officials told us that figures on its costs are still estimates, as WFP record keeping has not differentiated school feeding within larger categories of development, emergency, and protracted relief and recovery operations.

grams of protein; 13 to 17 grams of fat; and no more than 300 grams of cereals, 30 grams of pulses, and 15 grams of vegetable oil.

We analyzed the nutritional value of typical food aid commodities and determined that the least costly mix of commodities—consisting of corn and vegetable oil--that met the above requirements for primary day schools would cost 3.72 cents per child per day (based on USDA valuations of the commodities for 2001).[98] If this diet were supplied for 180 days, the food alone would cost approximately $6.69 per child. On the basis of overall WFP costs for its various food aid programs in 1998 to 1999, we estimated that administrative, storage, and transportation costs would result in an additional cost per child (for a 180-day school meal program) of $7.70. The total average cost of this diet would be $14.39 per student. When factoring in the nutritional requirements of school-age children to include other essential elements, such as vitamins, micronutrients, and minerals, we found the lowest-cost, most nutritionally-complete recipe would cost $29.67 per child ($13.80 for the food and $15.87 for administrative and transportation costs.)[99]

Situations Where Other Approaches May Be More Cost Effective

According to a number of experts, school feeding programs may be less cost effective than other possible approaches, such as establishing

[98]This diet would provide 1,200 calories and meet or exceed the required daily amounts of proteins, fat, magnesium, selenium, niacin, and vitamin B6. The diet also would provide iron (60 percent), phosphorus (53 percent), zinc (43 percent), thiamin (98 percent), riboflavin (43 percent), folate (38 percent), vitamin A (71 percent), and vitamin E (51 percent). The diet would provide less than 2 percent of the required daily allowance of calcium, vitamin C, vitamin B12, vitamin D, and iodine.

[99]This diet--consisting of corn-soy blend, corn, wheat, vegetable oil, and beans--would provide 1,200 calories of energy and meet or exceed the required daily amounts of protein, lipids, calcium, iron, magnesium, selenium, vitamin C, thiamin, niacin, vitamin B6, folate, vitamin A, vitamin E, vitamin D, and iodine. The diet also would supply significant portions of phosphorus (69 percent), zinc (97 percent), riboflavin (80), vitamin B-12 (92 percent), and iodine (69 percent).

maternal child health and early childhood development programs and providing alternative nutritional or educational interventions.[100]

According to USAID and World Bank officials, maternal and early child feeding programs cost about the same as school feeding programs but have far greater impacts on both child and life-long learning capabilities than school feeding programs.[101, 102] Health- and nutrition-related programs directed at maternal care and early child development are positively associated with physical growth, basic cognitive abilities, school readiness, and positive classroom behavior. Such programs can help prevent malnutrition before it occurs or address it in its early stages[103] and thus

[100]According to Joy Miller Del Rosso, the cost of school feeding programs is a major issue for both governments and donors, since feeding programs of any kind are expensive. Cost alone can indicate little about the value of a school feeding program, she said; but unfortunately cost-effectiveness analyses that assess costs of school feeding programs relative to their impact on nutrition and education outcomes are for the most part unavailable. See *School Feeding Programs: Improving Effectiveness and Increasing the Benefit to Education: A Guide for Program Managers*, (Washington, D.C.: World Bank, August 1999).

[101]According to a USAID official, if nutrition is the problem, maternal child health and preschool feeding programs are more cost effective than school feeding programs. If education is a major weakness, investments in educational reform, teacher training, and learning facilities are more cost effective.

[102]In 2001, a USAID contracted evaluation of its school feeding program in Haiti, covering the period 1996 to 2000, was completed. (The program was primarily a school feeding only operation; however, some resources were devoted to food for education activities.) The report concluded there is no causal connection between school feeding and improved educational performance. Other factors such as school quality and parental variables, have a more direct influence on educational outcomes, it said. The report found the food for education approach to be very promising, provided that food is used as leverage to improve school quality. The report recommended USAID consider devoting all of the school feeding resources to food for education activities. However, USAID decided to phase out school feeding activities over a 3-year period. According to a USAID official, Haiti was loosing too many kids before they ever got to school. As a result, USAID concluded it would be more cost effective to employ the resources in a maternal and child health program.

[103]Early malnutrition coupled with inadequate intellectual stimulation and care are likely to result in severe and possibly irreversible damage to physical and emotional capacities fundamental to further learning. Consequently, programs in elementary schools and even kindergarten may be too late to develop these capacities in children.

increase the likelihood that children will be healthy when they reach school age.[104]

Table 12 provides an estimate of the cost effectiveness of nutrition-related interventions for a typical developing country, in terms of the return on each program dollar spent, as reported by the World Bank. (Impact is estimated in terms of wages rather than learning per se.) As shown in table 12, school feeding has one of the lowest return ($2.80) of the 11 interventions. Interventions with the highest returns on each program dollar spent are iron fortification of flour ($84.10), vitamin A supplementation for all children under age 5 ($50), nutrition education ($32.30), and iodized salt ($28).

Table 12: Estimated Returns on Alternative Nutrition Interventions

Nutrition intervention	Return to program dollar (In wages, discounted to the present[a])
Iron fortification of flour	$84.10
Vitamin A supplementation for all children under age 5	50.00
Nutrition education	32.30
Iodized salt	28.00
Supplementation of pregnant women with iron pills	24.70
Vitamin A fortification of sugar	16.00
Iodine supplementation for women of reproductive age	13.80
School feeding	**2.80**
Nutrition as part of primary health care	2.60
Food supplements	1.40
Food subsidies	0.90

Note: The methodology and assumptions used in making the estimates were not described in the article.

[a]The discounted present value of wages represents the current value of future wages.

Source: Judith S. McGuire, "The Payoff from Improving Nutrition" (updated January 1996), as reported in The World Bank Group, "Nutrition as a Sound Investment," *To Nourish a Nation* (The World Bank Group Web site, March 30, 2001).

[104]In commenting on a draft of this report, WFP indicated it agreed with the views expressed in this paragraph. WFP noted that it has implemented a large number of maternal and child health programs.

In a study of the cost effectiveness of 40 educational interventions in Latin America, the authors surveyed a panel of 10 world experts on educational research and practical attempts at educational reform in the region, as well as 30 Latin American planner/practitioners working primarily in education ministries. Of the 40 interventions, 4 were variations on school feeding programs.[105] None of the school feeding options were identified as being among the top 10 interventions for increasing learning, taking account of the estimated likelihood of adequate implementation (see table 13). The school feeding options were ranked between 23 and 34 in terms of increasing learning and between 34 and 40 when cost effectiveness was also considered.[106]

Table 13: Expert Views on Top 10 Educational Interventions for Latin America

Top interventions for increasing achievement, based on the estimated likelihood of adequate implementation
1. Provide standard textbooks and train teachers in usage
2. Pay teachers in rural schools salary increment of 50 percent
3. Provide multiple interventions: learning packages, school-based management, training, testing
4. Provide learning materials for individualized instruction
5. Assign best teachers to first grade
6. Extend daily schedule by 1 hour
7. Decentralize schools with supervision
8. Provide developmentally oriented preschooling (100 percent unit cost of primary school)
9. Provide classrooms with standard textbooks
10. Raise teachers' salaries by 20 percent

Source: Ernesto Schiefelbein, Laurence Wolff, and Paula Schiefelbein , *Cost Effectiveness of Education Policies in Latin America* (Washington, D.C.: Inter-American Development Bank, Dec. 1998).

According to Beryl Levinger, an expert on school feeding and food for education programs, there are children in developing countries that can

[105]The options were 50 percent of students receive a free snack; 100 percent of students receive a free snack; 50 percent of students receive a free lunch; and 100 percent of students receive a free lunch.

[106]The 30 planner/practitioners' rankings closely paralleled those of the experts.

effectively and efficiently benefit from school feeding programs. Short-term hunger is a genuine problem, and school feeding is one way to get and keep children enrolled in school, she said. At the same time, success in improving school enrollment, attendance, and learning is context driven, and many external factors can affect and interfere with these outcomes, she said. Therefore, according to Levinger, one needs to assess the total picture and identify the most important needs and best solutions for addressing them. For example, if the quality of education in a particular community is low and resources are limited, it is possible that resources could be better spent on improving education than addressing short-term hunger. As learning tasks become more interesting, she noted, learning goes up. Levinger estimated that providing motivational textbooks and other learning materials and training teachers in active learning methods would cost roughly about $5 per pupil per year. For an additional $2, she said, one could also provide some micronutrient supplementation and deworming treatments.

Multiple studies of treatments for intestinal parasite infections, through iron supplementation and regular deworming, have shown benefits of lower absenteeism and higher scores on tests of cognition or school achievement at a cost of about $1 per child per year.[107] This is considerably less costly than school feeding programs that average $34 per child per year. However, we are not aware of any studies that assess and compare the relative impacts of programs that only treat for parasite infections to programs that provide a school meal.

In April 2000, the World Health Organization, the U.N. Educational, Scientific, and Cultural Organization, the U.N. Children's Fund, and the World Bank proposed a strategy for Focusing Resources on Effective School Health (FRESH) to give a fresh start to improving the quality and equity of education and promoting the Education for All goal. They noted that poor health and malnutrition are important underlying factors for low school enrollment, absenteeism, poor classroom performance, and early school dropout. The agencies identified a core group of activities that they said captured the best practices from their programming experiences, were highly cost-effective, and a starting point to which other interventions might be added as appropriate. The agencies recommended that the

[107]World Bank, "School Health" (Washington, D.C., March 2001).

following basic components of a school health program be made available together, in all schools: (1) health related school policies;[108] provision of safe water and sanitation;[109] (3) skills based health, hygiene, and nutrition education;[110] and (4) school based health and nutrition services.

Regarding the latter component, the agencies said schools can effectively deliver some health and nutritional services provided that the services are simple, safe, and familiar and address problems that are prevalent and recognized as important within the community. For example, they said, micronutrient deficiencies and worm infections may be effectively dealt with by infrequent (6-monthly or annual) oral treatment. As another example, they said changing the timing of meals, or providing a snack to address short-term hunger during school—an important constraint on learning—can contribute to school performance.[111]

In commenting on a draft of portions of this report, WFP officials said there has been no more cost-effective approach identified than school feeding for the combined objectives of increasing enrollment, attendance, and performance in developing countries--especially in areas of food insecurity. Further, when the key resource available is food, the case for school feeding to accomplish these objectives is indisputable, they said.

[108]Some examples that have been cited include school policies to increase the number of schools with adequate water and sanitation facilities; increase family life education and access to family planning services; reduce school dropouts because of pregnancy; and reduce discrimination against people with HIV/AIDS and their families.

[109]Described as the essential first steps toward a healthy physical, learning environment.

[110]In 2001, WFP was included in the FRESH initiative.

[111]In 2001, WFP was included in the FRESH initiative.

Process to Solicit, Evaluate, and Approve Proposals for the Pilot Program

USDA used a considerably different process to solicit, evaluate, and approve program proposals from interested cooperating sponsors and WFP. Cooperating sponsors, including Private Voluntary Organizations (PVO) and the government of the Dominican Republic, underwent an expedited two-stage qualification and proposal review process that either did not apply to or generally was different from that applied to WFP. Proposal formats and criteria applied to them by reviewers varied considerably. An interagency Food Assistance Policy Council (FAPC) made the final selection of project awards.

Proposal Process and Information Required

On September 6, 2000, USDA published a notice in the Federal Register requesting proposals from interested cooperating sponsors to carry out activities under GFEI. (See app. XI for key events under GFEI.) USDA said it would use section 416(b) of the Agricultural Act of 1949 to provide surplus agricultural commodities in support of an international school feeding program to improve student enrollment, attendance, and performance in poor countries. Proposals would be reviewed on an expedited basis. Given time constraints and the considerable effort and time involved in preparing and evaluating proposals, USDA invited interested sponsors to present an initial submission that contained only information intended to demonstrate, based on experience, the organizations' administrative capabilities for implementing and managing school feeding or monetization of commodities for school feeding. USDA identified nine types of information that should or could be provided. The deadline for initial submissions was September 15, 2000.

USDA said that sponsors found to be most capable of successfully implementing school feeding activities under step one would then be invited to provide a supplemental submission addressing their specific proposed activities. The deadline for the step-two submission was September 29, 2000. USDA said the submissions should provide information that supported the goal of establishing a preschool or school feeding program to draw children into the school environment and improve access to basic education, especially for females. Priority consideration would be given to

- countries that had a commitment to universal free education but needed assistance in the short run;

- places where preschool or school feeding programs would promote significant improvements in nutrition, school enrollment, and attendance levels;

- projects involving existing food for education programs; and

- projects where the likelihood of support from other donors was high.

USDA requested that sponsors provide, to the extent possible, information on (1) literacy rates for the target population; (2) percentage of children attending schools, with special emphasis on school-age girls; (3) public expenditure on primary education; (4) whether the country currently operated a school feeding initiative (either through USAID, with assistance from the World Bank, or through internal resources); (5) program impact on areas such as teacher training, community infrastructure (e.g., PTAs and community groups), health, and nutrition; and (6) other potential donors. USDA also referred interested parties to the Code of Federal Regulations, which describes the requirements for the standard 416(b) program. These regulations provide additional guidance on factors to address in preparing a proposal.

Twenty-nine PVOs submitted part one of the proposal application within the required time frame. On September 22, 2000, USDA announced that 20 PVOs had qualified for further consideration and invited them to submit the second part of the application on the specific projects they were proposing. In addition, USDA announced that the government of the Dominican Republic had submitted an application, which had been approved for further consideration, and that WFP was eligible to participate in the pilot program.

The September 6, 2000 *Federal Register* notice stated that the pilot program was also open to WFP. USDA did not require WFP to provide either the initial or supplemental submission. WFP had already submitted a set of proposals to USDA in August 2000, following consultations with USDA officials.[112] These proposals (1) were abbreviated; (2) concerned already existing or approved WFP school feeding projects that had not been fully funded, as well as planned expansions of these or other projects;[113] (3) and, in general, did not address many points that USDA had asked cooperating sponsors to address in the second-stage submission. The proposals typically contained a brief half-page description of the project, accompanied by a summary budget for the commodities requested. Some, but not all, U.S. agency officials charged with reviewing the proposals were told they could obtain additional information describing the projects on WFP's Web site. However, some projects had been approved by WFP's Executive Board in prior years. Information posted on the Web site was sometimes incomplete and/or out of date.[114]

USDA officials noted that the United States is a member of the WFP Executive Board and as such has a vote on which WFP proposed projects should be approved. They also noted that a vote by a donor country to approve a project does not mean that the country intends to donate to that project. In addition, they noted that approved WFP projects submitted to the pilot program in August 2000 would have been approved by the executive board prior to the U.S. announcement of the pilot program and GFEI.

[112]WFP has an umbrella agreement with USDA's Commodity Credit Corporation under which the corporation can donate 416(b) agricultural commodities to WFP to carry out activities in specific countries in accord with projects approved by the U.S. government through the WFP Executive Board approval process and for which the U.S. government has agreed to provide commodities. This agreement provided a basis by which USDA could make pilot program commodities available to WFP, since WFP only requested funding for projects that had already been approved by the executive board or, in the case of proposed expansion projects, agreements that would require the board's approval before they could become operational.

[113]Altogether WFP submitted 80 proposals covering 48 countries. Of the 80 proposals, 30 were for WFP approved projects that had unmet food aid needs and 50 were for expansion or new projects that still required approval by WFP's Executive Board.

[114]According to WFP, any budget information that was not available on WFP's Web site was made available to USDA upon request.

According to WFP officials, WFP is strongly committed to addressing the key factors associated with effective food for education programs discussed in this report. The U.S. government is well aware of this commitment, and as a result WFP did not deem it necessary to make repeated reference to this commitment in the country-specific information included in its proposals. WFP officials noted that proposals submitted to USDA for projects that had already been approved by WFP's Executive Board had gone through a long vetting process, adding that approval of a WFP project requires unanimous consensus from all executive board members, including the United States. The officials also noted that written documentation on its projects had been provided to U.S. government representatives during previous WFP Executive Board sessions when the projects had been reviewed and approved, as well as in sessions to review projects that had been operational. As a result, WFP officials said, the U.S. government had plenty of documentation for evaluating WFP proposed projects apart from documentation available at WFP's Web site.

However, USAID told us that when the United States concurs in an executive board decision to approve a project, the United States frequently states its concerns or reservations about the feasibility or sustainability of program activities and has done so in the case of school feeding programs. Therefore, the fact that a particular project had been approved by WFP's Executive Board did not necessarily mean the project was a good candidate for the U.S. food for education pilot program. In addition, according to a USAID official, though in principle U.S. government personnel responsible for evaluating WFP proposals could have gone to WFP's Web site to look up additional documentation, there was little time to do this because of the push to get the pilot program up and running so quickly. He added that he knew of no one who used the Web for this purpose. He also said the evaluation task force members did not receive hard copies of documentation beyond the abbreviated set of proposals provided by WFP to USDA.

Proposal Evaluation Process And Agencies' Criteria

USDA/Foreign Agricultural Service (FAS) staff evaluated the initial PVO submissions on the basis of criteria in USDA's September 6, 2000, Federal Register notice. USDA/FAS assigned different weights to the criteria. PVOs that scored above a certain level were invited to submit the second part of the requested proposals. Of 20 PVOs invited to make a second submission, 19 responded and 1 declined, citing a lack of adequate time to prepare the type of careful proposal the organization wanted to submit.

The 19 PVOs submitted a total of 62 project proposals. The government of the Dominican Republic also responded with a proposal.

For the second part of the proposal process, which covered the actual programs sponsors proposed to implement in various developing countries, USDA/FAS employed a more elaborate review procedure. The Food Assistance Policy Council (FAPC)[115] was designated to make the final project selections. An FAPC working group was established to evaluate the PVO, government of the Dominican Republic, and WFP proposals and make recommendations on which ones to approve. The working group consisted of staff from FAS and its Food and Nutrition Service (FNS), the Department of State, USAID, OMB, and the White House.

USDA/FAS provided the other members of the working group with copies of all of the second-stage as well as WFP set of proposals. USDA/FNS assigned a nutritionist to review all of the proposals from a nutrition perspective. The Department of State assigned two staff to review the proposals. Four offices within USAID were involved in evaluating the proposals: a country backstop officer, the appropriate regional bureau, a nutritionist analyst from the Bureau of Humanitarian Response, and an education specialist from USAID's Global Bureau, Field Support and Research. USAID's Food for Peace Office within the Bureau of Humanitarian Response coordinated the process within USAID. The Food for Peace Office is responsible for USAID's food aid programs, including any programs that have funded school feeding or food for education programs. Each member of the working group conducted an evaluation of the proposals separately during October 2000 and met in early November to discuss their results and reach consensus on which proposals to submit to the FAPC for final approval.

USDA/FAS did not score but recommended approval of WFP proposals for all 27 countries in which WFP had established, but unmet, food aid requirements. However, USDA scored and divided the non-WFP proposals into three distinct categories (i.e., strongly recommended, recommend approval, or not recommended). In conducting its second-stage evaluation of the non-WFP proposals, USDA/FAS employed a considerable number of written criteria, nearly all of which were taken from its standard approach

[115]The FAPC membership included USDA, USAID, the Department of State, the National Security Council, the Office of the President, the Council of Economic Advisors, the Office of Management and Budget, and the Office of the White House.

to evaluating 416(b) programs. The standard criteria do not focus on school feeding or food for education programs. Apart from the standard criteria, USDA's evaluation included some criteria that related to school feeding/food for education. (All of USDA's second-stage criteria were weighted.) USDA considered whether:

- Objectives supporting the goal of establishing preschool or school feeding programs to draw children into the school environment and improve basic education for females were clearly stated.
- The proposal targeted a country with existing food for education programs in the host country's development plan.
- The method for choosing beneficiaries (whether for preschool or school feeding) activities was clear and justifiable; emphasis on females.
- The cooperating sponsor provided indicators to measure program impact, including baselines and expected outcomes. Potential indicators might include literacy rates for target populations, percentage of school-age children attending school (emphasis on females), and public expenditure on primary education.
- The cooperating sponsor included specific performance targets as part of its proposal, such as magnitude of change in number of meals served; enrollment levels, specifically female enrollment; attendance levels; capacity building in areas necessary to sustain the feeding program, such as development of PTAs and other community groups; or infrastructure development for delivery of service.

Agriculture officials told us they did not have time and adequate staff to study lessons learned from past school feeding/food for education programs given the short lead time they had to get the program up and running. Instead, they said, USDA relied considerably upon USAID for this aspect of the evaluation, since USAID had extensive experience with school feeding programs.

Most of USAID's written criteria did not focus specifically on food for education. Evaluators in the Regional Bureaus were asked to review how the proposals fit with the bureau priorities for the country and how a proposed project might affect (positively and/or negatively) USAID programs in the country. The bureaus were also responsible for providing each country proposal to the respective cognizant field mission and for incorporating mission responses and concerns into their review. Field missions were also responsible for providing input regarding the Bellmon analysis.[116] Country backstop officers were asked to review each country proposal regarding commodities, monetization, and logistics and how these issues might affect (positively and/or negatively) USAID's Title II food aid programs in country. The USAID nutritionist was asked to review the nutritional components of the proposal and their adequacy. USAID's Global Bureau was asked to review the educational components of the proposals and their adequacy, as well as host country policies and commitment to basic education. All of the USAID evaluators were instructed to indicate briefly whether they approved or disapproved of a proposal and, if they approved, to indicate the priority they thought the proposed program should have (low, medium, high, very high).

In USAID's weighting scheme, the Global Bureau's assessment of the educational component could have accounted for about 25 percent of a proposal's total score. However, for several reasons, its analysis did not contribute to USAID's evaluation of which proposals were the best. The USAID staff person assigned to rate this dimension of the proposals told us that although he had expertise in the education area, he was not an expert on school feeding programs. In addition, he said that nearly all of the proposals did not provide adequate information to judge the quality of the educational component. He told us it might have been possible to obtain this information if discussions could have been held with the sponsors. However, the evaluation process did not provide for such interaction. As a result, he assigned the same score to all but one of the proposals. Since virtually all proposals were scored exactly the same, education was not a discriminating factor in the Global Bureau's overall ranking of the proposals.

No formal record was kept of the interagency working group's deliberations, but a summary of its consensus recommendations was forwarded to the FAPC for action. This summary contained a brief

[116]See letter for a discussion of the Bellmon analysis.

description of the proposed food aid to be delivered to each country, its cost and rationale, economic assessments, and prior aid. In the end, the FAPC approved 34 WFP proposals covering 23 countries. Of the 34, 26 were for approved WFP projects with unmet food aid needs and 8 were for expansion projects. FAPC approved 25 PVO projects and the only proposal submitted by a government entity (the Dominican Republic). FAPC allocated almost equal program value to WFP (about $138 million) and the other sponsors (about $150 million), with instructions that the remainder be first offered in support of additional WFP proposals. However, cost estimates that FAPC used in its award determinations were too high and have since been reduced by USDA in implementing agreements. The total cost of WFP agreements was recently estimated by USDA at about $92.5 million; cooperating sponsors' agreements were estimated at about $135 million.

Selected Information Contained in Proposals for Approved School Feeding Programs

This appendix discusses selected information in school feeding program proposals approved by USDA, including proposed nonmeal components of the program, proposed funding of nonmeal components, and comments on other donor assistance.

In its request for proposals, USDA indicated that PVOs could monetize some of the food to cover certain other elements important to food for education programs. Table 14 provides information on the PVOs that proposed funding for nonmeal components, including the specific components and the overall proposed funding amount for these components. As the table shows, for 17 of the 25 approved proposals, PVOs proposed to include a variety of nonmeal components. Examples include repairs to school buildings, investments in teacher training and school supplies, treatments for parasite infections, and health and nutrition education. Ten of the 17 proposals included a budget amount for some or all of these components.

Table 14: Budgeted Amounts for Nonmeal Program Components Included in PVO Proposals Approved by USDA

PVO and country	Proposed nonmeal components of the project	Proposed budget amount
Counterpart International (CPI) Senegal	Small grants program, including a scholarship fund for girls of low-income families who would otherwise not attend school, improvement of school and school feeding infrastructure, teacher enrichment training, and provision of agricultural inputs for other income-generating activities.	$270,000
	Nutritional and sustainable agricultural technical assistance and community training. Teach improved sustainable dry land agricultural techniques in rural areas. Provide deworming medicine to children.	$143,500
	Provide information campaign on the importance of education and nutrition.	$85,000
Save the Children (STC) Uganda	None.	N/A
Mercy Corps International (MCI) Eritrea	Parent school committee capacity building. Provide training to at least 100 parent school committees, including training on how to write proposals and budgets for rehabilitation of their schools.	$180,000
	Facility repair. Provide grants to 90 parent school committees that will be used to repair primary schools and distribution warehouse facilities.	$270,000
Land O'Lakes (LOL) Bangladesh	Education program. Deliver nutritional education curriculum (approved by the government) to participating schools to be integrated into classroom discussions.	Not specified

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PVO and country	Proposed nonmeal components of the project	Proposed budget amount
LOL Vietnam	Education program. A nutritional education curriculum (approved by the government) to participating schools to be integrated into classroom discussions.	Not specified
International Partnership for Human Development (IPHD) Moldova	None.	N/A
ACDI/VOCA Uganda	Mobilize and provide organizational and leadership training to PTAs. Assist in developing sound organizational structures, school and community engagement strategies, and action plans.	$17,500
	Provide seeds, tools, and technical assistance to establish and maintain school gardens. Potential uses include on-site breakfasts for students, sale of the produce to purchase school supplies and materials, or supplemental take-home commodities for most needy families in the community.	$64,000
	Feeder road linkage to schools. Link current PL480-supported community feeder road rehabilitation program in Gulu with the program implemented by CRS. Feeding effort is intended to increase attendance, and the feeder road activity will complement this by increasing access to the selected schools.	Not specified
	Organize and deliver teacher/administrator training. Develop training modules for teachers and administrators, together with national and district education officials and other relevant organizations. Pedagogy experts from the Ministry of Education and Sports will conduct training modules through this program.	$136,200
IPHD Republic of Congo	None.	N/A
International Orthodox Christian Charities (IOCC) Georgia	None.	N/A
IOCC Lebanon	None.	N/A
Catholic Relief Services (CRS) Albania	Tie school feeding program to a longer-term CRS initiative, a Parent School Partnership (PSP) program, which aims to increase community involvement in the education process. The program includes training for parents and teachers on writing project proposals, fund raising techniques, and long-term strategic planning; grants given to Parent Councils (maximum of $1,500 per grant) for small projects in their kindergartens. Mini-projects might include new school materials, seminars and publications on nutrition for young children, new playground equipment, of child-sized furniture in classrooms.	Not specified
CRS Bosnia/ Herzegovina	Within the framework of PSP program, promote community involvement, diversity, aid to the poor, sustainable structures, and quality education, by working to empower local citizens, partnering with local communities to reconstruct and repair school buildings damaged by the war, working with mixed communities where stakeholders are actively engaged with each other to focus on the education of their children, providing education in conflict transformation and peace-building strategies, and promoting gender inclusiveness.	$256,000

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PVO and country	Proposed nonmeal components of the project	Proposed budget amount
CRS Benin	Within PSP focus on training and strengthening PTAs and teachers to improve the educational system of the targeted area. The program will include the completion of up to 30 small grant projects. The types of needs targeted are basic school infrastructure, and school materials such as textbooks and chalk boards.	$433,307
CRS Guatemala	Infrastructure improvements. Examine, and when feasible, make repairs to basic school infrastructure. Community education committees will provide labor for these repairs and GFFEI-Guatemala will provide basic materials. Seek to provide a girl-friendly environment in schools by considering factors such as latrine privacy and security.	$40,000
	Community education committee. Form a committee that gives parents and community leaders a role in program activities such as infrastructure improvements to the schools and food distribution.	Not specified
	Teacher training. Provide quarterly training sessions to enhance teachers' awareness of different learning styles and pedagogical options, creating an environment that will respond to the needs of the children.	$22,368
	Educational materials. Reference materials, such as dictionaries and encyclopedia sets, will be provided for schools participating in the GFFEI program.	$170,000
	Health and nutrition in the classroom. Train teachers in health and nutrition. Integrate improved health and nutrition practices into daily classroom activities.	$7,000
CRS Honduras	Deworming/vitamin A. Provide deworming treatment and vitamin A supplementation to all children.	Not specified
	Promotion of girls' education. Develop tools for understanding the economic and cultural factors that hinder girls' access to education in the region. On the basis of findings, introduce consciousness-raising about the cultural and attitudinal factors regarding girls' participation in formal education into teacher training.	Not specified
	Establish an improved educational services committee in each school (consisting of school, personnel, parents, and municipal authorities to enhance a health, hygiene, and nutrition program, organize broad-based support for school improvement activities, and develop strategies for sustaining the benefits of the project). In addition, promote establishment of community libraries and identification of teacher training opportunities.	Not specified
	Enhancement of learning environment. Ensure that participating schools have access to clean water and appropriate sanitation facilities. Program resources will be made available for the construction of latrines for students, with separate facilities available for boys and girls. Particular emphasis will be placed on creating an environment attentive to the sanitary needs of girls. The project will also facilitate repair of school infrastructure. In addition, it will provide a computer and basic complementary hardware/software for each school during its first year in the program as well as school supplies and key educational materials.	Not specified
	Training of community and school personnel. Provide health, hygiene, and nutrition training to committees enabling them to carry out research and supervision tasks. Instruct classroom teachers on information delivery for children.	Not specified
Project Concern International (PCI) Bolivia	Establishment of greenhouses, school gardens, etc. Provide greenhouses, gardens, and demonstration plots, with the aim of ensuring program sustainability. PCI has experience in these activities with the USAID Title II program. Due to limited financing, only a small number of these projects will be implemented. For example, in the area of Uncia, Potosi, in which 359 schools will participate in the program, 25 greenhouses, 80 school gardens, and 25 demonstration plots, will be built in coordination with municipalities and school districts. Only schools that show interest and have the capacity to manage this infrastructure will be selected.	Not given

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PVO and country	Proposed nonmeal components of the project	Proposed budget amount
	Training of teachers. Carry out periodic workshops for municipal officials and Ministry of Education specialists of each district. Participants will be trained in the goals of the program. Additional training will cover improved educational methodologies, improved educational environments for girls, program supervision. Immediately after these workshops, PCI and the Ministry of Education specialists will train teachers in each participating school about educational reform, curriculum development, educational methodologies, and classroom supervision.	$100,000
	Specific support for girls' attendance. Special recognition will be given to schools that achieve the goals of increased inscription and attendance of girls in a public ceremony given by the Ministry of Education and municipalities in coordination with Project Concern International.	Not specified
	Complementary health activities. Nurses from the nearest health post will make at least two visits per year to participating schools to perform vision and hearing exams, provide deparasitization medication, and provide health education. Constant monitoring of health and nutrition activities will be made by permanent PCI staff as well as education and training in nutrition and proper food preparation.	Not specified
PCI Nicaragua	Training component. Purchase educational materials to improve the learning environment in participating primary schools. PCI has 9 years of experience in Nicaragua with participative methodologies that are useful and attractive to teachers and their students. Training in health, environment, and food security will also be given to the beneficiaries. During the baseline study, teachers will identify special needs related to methodologies and food security. PCI staff will then design workshops that will be carried out periodically (five during the school year, including a final workshop to evaluate the program) with the authorization of the Ministry of Education. Teachers will receive training in the organization and operation of the school feeding program, and the importance of encouraging enrollment of new students and attendance of current students. An average of two teachers from each school will be trained. Schoolchildren will be trained in hygiene, nutrition, food security and school gardens.	Not specified
Cooperative Assistance for Relief Everywhere (CARE) Albania	Improved access, quality and relevance of basic education. Focus on providing educational opportunities for girls and participation of girls. Support improved access, relevance and quality of basic education for all children through the restoration of basic school infrastructure facilities; development of curriculum content that includes life skills development (such as preventive health, nutrition, sanitation, personal and family care and development) and addresses student well–being, including psycho-social trauma healing, conflict resolution, and gender equity; child-centered learning methods, child-to-child and child-to-family learning approaches; and a learning environment with high emphasis on gender awareness and equity.	$340,000
	Support formation of PTAs in communities and establish community-based accountability for basic education through improved communication between community members (parents, in particular mothers of school-aged children) and teachers, as well as other school and government authorities.	$45,000
	Provide teacher training to 300 primary school teachers to strengthen the quality of child-centered learning approaches in basic education.	$67,000
CPI Georgia	Public information campaign. Organize a mass media campaign (television and radio) on improving nutrition, cooking methods, and sanitation. Program expected to reach 400,000 viewers or approximately one-third of the adult female Georgian population (who prepare the majority of meals). Training films for local farmers will be produced and shown locally in targeted villages and/or on television. Films will cover nutrition, health, and improved agricultural techniques, such as increasing plot yields and creating school gardens. Local print media campaigns, including newspaper articles, advertisements, and brochures, also will be developed to reach population in mass media-inaccessible regions.	$129,992

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PVO and country	Proposed nonmeal components of the project	Proposed budget amount
	Income generation. Assist development of small-scale local industries (production and sale of clothing, shoes, and food) by purchasing these local commodities for distribution to families with school-age children.	$30,000
	Improved school infrastructure and supplies: Oversee basic school infrastructure repair and maintenance activities including fixing broken windows, doors, flooring, roofs, and minor wall damage. Provide necessary sources for heat, as well as manage improvements to the school cafeteria/kitchen and basic sanitation infrastructure. Provide assistance to low-income families in the form of locally manufactured items such as clothing and uniforms, shoes, books, a school supplies.	$1,930,000
Adventist Development & Relief Agency (ADRA) Bolivia	Training. ADRA will provide support and training for schools and school directors on the organization of school boards, program management and administration, and food preparation. Training will be provided to volunteer community education promoters in promoting the enrollment and regular attendance of students with priority given to females. Parents will be trained in themes that support and encourage the education of their children. Parents, municipalities, and education authorities will receive training on environmental consciousness, especially focusing on mitigation of the widespread use of firewood in the preparation of food.	Not specified
ADRA Madagascar	Promote increased commercial poultry production. Also promote, through the monetization of corn, increased commercial production of chickens and eggs in the region, and stimulate market demand by introducing these high protein foods into the school feeding program on a periodic basis. Project will reduce land pressure, improve economic conditions of producers, increase the dietary protein intake, and promote program sustainability.	Not specified
ADRA Yemen	None.	N/A
	Food for work. Encourage active participation of local communities and parent groups in the upgrading of school infrastructure and facilities for their children. Food for work labor will be used to complete the school repair, sanitation and water, and equipment projects for the schools.	Not specified
	Food security grants. Work closely with kindergartens and boarding schools to implement a sustainable, self-help program designed to ensure institutional food security through income generation and food production activities. Award small grants to schools demonstrating their commitment and capacity to develop and maintain a self-sustaining school feeding program.	$50,000
	Infrastructure repair. Assist schools that are in danger of closure due to poor or nonfunctioning heating systems with infrastructure repairs.	$250,000
	Sanitation/water. Improve overall sanitation at schools by installing safe, functioning toilet and water facilities.	$35,000
	School equipment and supplies. Replace missing, broken, and/or obsolete classroom equipment and supplies in schools suffering from insufficient funding for these materials.	$150,000
World Share (WS) Guatemala	Continued education activities. Engage adolescents (aged 12-18) who are no longer enrolled in school in weekly informal educational programs (cultural, sports, sex education, and skills training). Develop a curriculum for these interventions, and train and compensate participating teachers. Offer literacy programs to adolescents and young adults.	Not specified
	Food scholarships. Provide a "food" scholarship to families and secondary schools to enable increased enrollment. Families of students in the target areas who demonstrate 75 percent attendance in secondary school will receive a monthly food ration. Food will also be contributed to help fund the costs of secondary boarding school. 1,000 partial scholarships will be available for fiscal year 2002 and fiscal year 2003.	Not specified

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PVO and country	Proposed nonmeal components of the project	Proposed budget amount
	Food for work. Provide food for work rations for each day worked on construction of 35 school classrooms. Provide construction materials (just under $2,000 worth of materials in addition to skilled labor) that are not locally available. Communities will provide locally available materials and unskilled labor.	Not specified
	School supplies. Provide preschool and primary school students with basic school supplies. Preschool students will receive educational games and other materials that can be shared. Materials will be targeted toward the most needy communities.	Not specified
Mercy USA (MUSA) Albania	None.	N/A

Note 1: N/A represents not applicable.

Note 2: The table provides information based on information included in sponsors' proposals to USDA. It does not include information based on final agreements negotiated between sponsors and USDA.

Source: GAO analysis of approved PVO proposals.

According to information from USDA, it provided little funding for nonmeal components of WFP projects. WFP requested funding for the underfunded school meals of already existing projects or for meals for expansion of existing projects or start-up of new projects. These requests included funding for the commodities and related costs, including ocean freight and overland transportation costs to the recipient countries; internal transportation, storage and handling costs for the commodities within the recipient countries; direct support costs; and administrative costs.

According to WFP, its projects often include funding for nonmeal components, which can be obtained through donor countries, partnership arrangements with other international donors, or by recipient country governments. WFP officials told us they are working to develop more partnerships with other donor agencies to address nonmeal aspects of their food for education projects. Table 15 provides information on planned funding of nonmeal components for the pilot program approved WFP projects, based on WFP documentation that was available at WFP's Web site. Nonfood components typically involve training, construction or rehabilitation of school facilities, or health related activities (such as deworming).

Table 15: WFP Projects' Funding for Nonmeal Program Components

Country	Proposed nonmeal components of the project	Amount budgeted
Bhutan	Boarding facilities. The project also provides support for the maintenance and construction of boarding facilities, which are crucial to bringing education within reach of children from remote areas.	$1,100,000 (Gov't of Bhutan)
	Headmaster/teacher training. The project will provide gender training for primary school personnel, including headmasters of assisted primary schools and primary teachers who are teaching in the nonformal education program	Not specified
	Increasing the capacity/standards of hostels. Basic equipment for girls' hostels at junior high and high schools will be supplied. Girls often cannot enroll, simply because there are not enough beds or because existing equipment is inadequate for the needs of girls.	Not specified
Bolivia	Training. Project activities will be implemented in centers for up to 30 children with 2 educators and 1 cook. Food aid will be given to the educators, cooks, and children. A new phase of the project envisages more appropriate training and materials for the rural facilitators/educators, including functional literacy and food preparation and storage. NGOs will be the major implementing partners, and several U.N. agencies will provide material support and participate with training activities.	Not specified
Cambodia[a]	None.	N/A
Cameroon	Community grain storage. In collaboration with CARE, WFP will provide assistance of an initial stock of 10 tons of cereals to grain storehouses and train 1,600 persons to manage both storehouses and village grain stores. The objective is to reduce food insecurity in the north and far northern provinces, reduce grain losses, and stabilize prices.	Not specified
Chad	None.	N/A
Colombia	None.	N/A
Cote d'Ivoire	None.	N/A
Dominican Republic	Government programs for deworming, safe water and sanitary facilities, and health/nutrition education will be integrated in the school feeding project.	Not specified
	Provision of gas stoves to schools initiated within the current project has resulted in an estimated 80 percent reduction of community wood consumption with benefits for the environment and natural resources. Many households have now acquired gas stoves for their own use. To the extent possible, the project will continue to provide gas stoves to schools to reduce the use of charcoal and firewood.	Not specified
El Salvador	None.	N/A
Ethiopia	None.	N/A
Gambia	In coordination with the government, PTAs, the World Bank, UNICEF, and NGOs, school infrastructure will be rehabilitated and/or expanded; the school environment for girls will be improved; more female teachers will be trained; the curriculum will be revised; and community-based organizations will be supported.	Not specified
	PTA training. Several NGOs will be tasked with campaigns and training sessions for PTAs to ensure that the community, and particularly women, are actively involved in the management of school canteens and are generally aware of educational problems and their solutions.	Not specified
Ghana	None.	N/A
Guinea	None.	N/A

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Country	Proposed nonmeal components of the project	Amount budgeted
Honduras	Through the school feeding, WFP is also supporting the national deworming program.	Not specified
Kenya	None.[b]	N/A
Mozambique	Training. WFP will finance provincial training seminars for appropriate school personnel, staff members, and coordinators (30 people per session of 1 week with 3 trainers) on topics such as school management, food purchase, food storage and handling, nutrition and monitoring, access and infrastructure, gender, etc. Local capacity to prepare and manage schools budgets will be strengthened through appropriate training.	$160,000[c]
Nepal	Treatment for parasitic infections. This deworming component will be carried out with the World Health Organization, which will also be responsible for training health staff. This component will cost an estimated $200,000 and be funded by the Canadian International Development Agency.	Not specified
	Basic Primary Education Project. Objectives include school construction and repair, curriculum reform, teacher training, provision of textbooks, strengthening of girl's education, etc. Project will be implemented in close coordination with the Basic Primary Education Project (BPEP), which is supported by a consortium of donors including the World Bank, the Asian Development Bank, the Danish International Development Agency, UNICEF, the European Union, and others.	Not specified
Nicaragua[a]	None.	N/A
Peru	Student instruction. This project will also include nutrition, health, and hygiene instruction with manuals and demonstrations at schools.	Not specified
Tajikistan	None.	N/A
Tanzania	Training courses for school committees will be organized and cover the importance of women's participation; their role in promoting education in the community, particularly education of girls; the role of the school committee in project implementation; and general aspects of project management at school level (food handling, hygiene, recordkeeping, etc.).	Not specified
	WFP will attempt to supply non-food items such as cooking pots, buckets, water storage tanks, drinking cups, and cutlery for schools to complement the few items provided by local project authorities and communities.	$41,600
	The school feeding project will have direct links with WFP-assisted food for work project. It will support food security and rural infrastructure in drought-prone areas through self-help schemes, which in turn will support the construction and rehabilitation of school infrastructure such as classrooms, hostels (particularly for girls), pit latrines, and storage rooms.	Not specified
Uganda	Informal education for pastoral families. WFP will collaborate with a voluntary organization to support a nonformal program designed to impart and encourage the families to acquire functional and basic life skills that are relevant to their lifestyles, such as animal husbandry, water and rangeland management, literacy, and numeric know-how.	Not specified
	School gardens/farms. WFP will support 10 schools annually to nurture school gardens/farms and establish a tree nursery. Each benefiting pupil and adult will be responsible for planting and maintaining one tree per year. WFP will provide funds for seeds, watering cans, water hoses, hoes, shovels, hand spades, plastic tubing for seedlings, wire and material to protect saplings/seedlings, etc.	Not specified
	WFP will provide fuel-saving cooking pans and stoves to schools with more than 400 students. One cup and plate per pupil and cooking pans will be provided for those schools that do not have adequate cooking facilities.	Not specified

Note 1: Projects include only those approved for USDA's pilot program. Nearly all of the funding information in the table was not included in the proposals provided to USDA. However, some members

of the interagency task force that evaluated the pilot program proposals were told that additional information on the WFP proposals could be found at WFP's Web site. (See app. VI for additional information on this issue.) We obtained the information for this table from WFP's Web site. Information for some of the projects may not be complete because of outdated and/or insufficient documentation at the site.

Note 2: N/A represents not applicable.

[a]Some of the available documentation was for larger assistance efforts providing food aid that may or may not include school feeding programs.

[b] No nonmeal component could be determined for Kenya from the available paperwork.

[c]Amount budgeted is for 2 or more years.

Source: GAO analysis of WFP information.

Although USDA said that priority would be given to proposals where the likelihood of other donor support was high, neither USDA nor USAID included this factor in written criteria for evaluating the proposals. We reviewed the PVO proposals to assess whether sponsors in fact provided such information in their proposals. As table 16 shows, only five of the approved proposals indicated that other donors might support the project. Of the five, two proposals said other donors would support the project and identified the expected amount of support.

Table 16: Number of Approved PVO Proposals With Information on Other Donors

Item	PVOs (total approved proposals = 25)
Proposal indicated whether other donors may support the program	5
Proposal stated that the likelihood of other donors supporting the program is high	1
Proposal stated that other donors will support the program	2
Proposal identified the dollar amount of support expected from other donors	2

Source: GAO analysis of approved PVO proposals.

Donor Views on Uses of Food Aid And How It Is Provided

This appendix discusses the views of food aid donating countries other than the United States regarding the use of food aid and how it is provided.

Table 17 lists donor countries' views on whether food aid should be used for emergencies, development, or both and whether food aid should be provided as cash or food-in-kind.

Table 17: Donor Views on Uses of Food Aid and How It Is Provided

Donors[a]	Views on whether food aid should be used for emergencies or development	Views on whether food aid should be provided as cash or food-in-kind
European Commission	Prefers to limit food aid to emergencies and rehabilitation situations where there is a nutritional crisis so as to get a country back on the development track. Prefers not to provide food aid for development per se.	Does not exclude the use of food-in-kind from donor countries in appropriate circumstances, where this is the best source. However, food aid should not be used as a systematic mechanism for surplus disposal.[b]
Japan	Believes food aid for development is effective but prefers to give aid for emergencies.	Says food-in-kind raises questions about possible adverse effects on recipients' markets. Supports use of cash to purchase food locally and regionally.
Canada	Makes core contribution to WFP for development projects and supports WFP's enabling development policy, but needs to see program results. Food aid may not be the most effective way to reach the poorest and most vulnerable.	Supports food-in-kind contributions when they are delivered effectively and in a nontrade-distorting way. Has some concern that U.S. use of surplus commodities may not always meet these criteria.
Australia	Strongly supports WFP development programs.	Has reservations about food-in-kind's capacity to adversely affect commercial markets. Is concerned about donor sustainability if program depends on surplus disposal of commodities.
Germany	Believes WFP should primarily provide food for emergencies and then contribute to food security for vulnerable groups like children, lactating mothers, and the elderly. However, Germany does provide a regular donation to WFP development programs and is one of the biggest contributors to such programs.	Prefers cash contributions so as to encourage local or regional purchases of the food aid. Provides only cash, which is not tied to the purchase of German commodities. Food-in-kind donations sometimes change local taste preferences and attitudes toward foods, which can deprive local farmers of their traditional markets.
France	Believes it is useful for WFP to provide both emergency and development assistance. Development is not the first task of WFP but should be part of its activity.	Provides both food-in-kind and cash.
United Kingdom	Is very skeptical of food aid for development and generally does not believe in it.	Generally does not approve of providing food commodities for assistance. Commodities are cumbersome, inefficient, and not a viable development tool. Cash is flexible and efficient and does not have a negative impact on the local community. Food-in-kind lacks positives,other than helping the farmers in the donor country.

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Donors[a]	Views on whether food aid should be used for emergencies or development	Views on whether food aid should be provided as cash or food-in-kind
The Netherlands	Does not see food aid as an important tool for development. Does not provide any contribution for WFP development projects.	Feels that food-in-kind has a negative impact on local agricultural production in the recipient countries but has not studied the matter sufficiently to prove it.
Denmark	Feels that food aid can be used for either emergency aid or development assistance.	Provides both cash and food to WFP. However, if Denmark sponsored an SFP, it would probably buy the food locally or regionally since it would be cheaper, contribute to local agricultural production (if available) and in turn sustainability, and would address cultural food preferences.
Sweden	Believes that all of WFP's assistance should go for emergencies but is not against other countries contributing to development projects. Sees WFP as a U.N. organization that should concentrate on emergencies.	Gives only cash to WFP.
Finland	Provides assistance to WFP for both emergencies and development projects.	Provides both food and cash to WFP. Has cautioned that food aid should not be used to dump excess agricultural product without taking into account its effect on recipient countries.

Note: Most of the information presented in the table is based on our interviews in February and April 2001 with representatives of the countries. European Commission views are based on a written statement provided to us in July 2001. We did not obtain Italian government views on the issues in this table.

[a]Donors are presented in descending order based on the total amount of their global food aid deliveries during 1995-99 (see app. X).

[b]In a May 4, 2001, demarche to the Department of State, the Commission said it had been concerned for several years by the U.S. tendency to use food aid to dispose of domestic surplus agricultural production to countries not experiencing any food emergency. Among other things, it said, such donations destabilize local markets and undermine agricultural production in some extremely fragile regions of the world where farming is of far greater importance to economic and social stability than in the United States.

Source: GAO.

Sources USDA Uses to Finance Its Implementing Partners' GFEI Project Costs

USDA uses three funding sources to pay for implementing partners' (PVO/government cooperating sponsors and WFP) operating costs under the GFEI pilot program. These costs cover the distribution of surplus commodities acquired under Commodity Credit Corporation Charter Act (CCC) authority and donated under Section 416(b) authority to friendly and developing countries. The funding sources are (1) local currency proceeds derived from monetization (sale) of the commodities, (2) direct cash payments made by CCC under commodity surplus removal (CCC Charter Act 5(d)) authority, and (3) direct cash payments made by CCC pursuant to specific limited appropriations authority granted to sponsors in July 2001.

Section 416(b) of the Agricultural Act of 1949, as amended, is the authority that CCC uses to pay for most of the cost of removing and disposing of donated surplus commodities in connection with the GFEI pilot program. This authority allows CCC to directly pay freight forwarders selected by implementing partners for the cost of ocean transportation and reasonably related expenses of moving the commodities to a designated discharge port or point within the country's border where the food aid is to be distributed. This cost is the largest except for the commodities themselves and is estimated to be roughly one-third of the overall pilot program. In the case of urgent and extraordinary relief requirements, CCC may also pay the partners for internal transportation, storage, and handling (ITSH) expenses but not for nonemergency development assistance, which is the principal type of aid provided by the pilot. In addition, under section 416(b) authority, CCC funds cannot be used to pay partners' direct administrative headquarters costs of running the program.

In lieu of getting CCC funding to recover their ITSH expenses for nonemergency programs and administrative costs, partners are permitted to monetize (i.e., sell) all or a portion of the commodities in the country or region. Local currency proceeds generated from the sale of section 416(b) commodities can be used to finance most of the sponsors' operating costs—as long as they are specifically approved by USDA in program agreements. Monetization is generally how the PVOs and government sponsors recover their operating costs. Furthermore, these sponsors' budgets and provisions for financial statement and monetization reporting as well as limitations on budget adjustments without prior USDA approval are incorporated into the program agreements.

USDA's treatment of WFP on these matters differs from that of PVOs and a government sponsor. USDA pays cash to WFP for all of these costs, including headquarters' administrative expenses. In doing so, it relies on section 5(d) of the CCC Act. This section provides authority for CCC to expend funds in connection with disposal of surplus commodities if such expenditure is required to aid in removing the surplus. WFP's general policy, as approved by its executive board, is not to monetize commodities. Thus WFP requires cash to cover its expenses. In addition, WFP operates under a "full cost recovery" policy, which requires that the country making a donation cover its full cost. According to USDA's Office of General Counsel, if USDA wants to dispose of surplus commodities through WFP, it may pay associated costs using section 5(d) authority.

Specifically, USDA costs incurred in connection with providing commodities to WFP under the GFEI program are governed by an agreement between CCC and WFP that covers matters related to donation of commodities furnished under section 416(b) during calendar years 2001 and 2002. Under this agreement, CCC agreed to pay WFP not only ocean transportation but other authorized expenses incurred by WFP in connection with distribution of commodities donated to it. Collectively, these other authorized expenses include internal transportation, storage and handling,[117] direct support costs, other direct operational costs, and indirect support costs, up to the maximum amount approved by CCC.[118] For the GFEI program, these costs amounted to about $35 million.

When USDA requested sponsor proposals for the GFEI pilot program in September 2000, it said CCC cash funds might also be available to cover expenses related to implementing activities supported with commodities acquired under section 5(d) of the CCC Charter Act. USDA delivered the same message in a meeting with PVOs to discuss the planned pilot program. As a result, most PVOs submitted proposals that were based on receiving cash to cover some of their expenses. However, in January 2001, USDA informed PVOs with approved proposals that cash would not be available to them.[119] Although USDA said it was prepared to adjust

[117]According to OMB, USDA uses CCC Charter Act funds to pay WFP for internal transportation, storage, and handling costs.

[118]According to WFP, this agreement reflects a commitment made by the U.S. government in WFP's Executive Board to fully cover the costs of delivering its food aid donations.

[119]According to an executive branch official, the decision had been made by November 2000.

approved sponsors' proposals to permit greater monetization of commodities to cover costs, the USDA reversal posed a few problems. First, monetized commodities cannot be used to cover the sponsors' direct U.S. headquarters' administrative expenses.[120] Second, depending on the situation in a recipient country, additional monetization of commodities might risk disrupting commercial sales. Representatives of one PVO told us the organization had submitted proposals for two countries where it was not possible to monetize commodities; therefore, without cash to cover its expenses, the PVO could not go forward. Several PVOs were also upset because they felt that USDA was providing preferential treatment to WFP.

USDA noted that its long-standing policy for section 416(b) projects was not to provide cash to PVOs unless the country is deemed urgent and extraordinary. It further said that PVOs and WFP were treated differently because they were fundamentally different in nature and in how they acquired their funding. USDA said that whereas PVOs are operated privately and have access to other funding sources, WFP is governed and funded only by its donor nations and thus not subject to or constrained by the limitations of the section 416(b) regulations. These reasons notwithstanding, USDA did not explain why it had earlier indicated an intention to provide cash to the sponsors.

USDA's policy reversal led to delays in USDA's negotiating agreements for implementing approved proposals for a number of PVO projects. Some PVOs were not satisfied with the policy change and made their views known to members of Congress. Subsequently, in July 2001, the Congress approved legislation (P. L. 107-20) that included a provision authorizing USDA to approve use of CCC funds up to about $22.9 million for financial assistance to sponsors participating in the pilot program. Funds could be used for internal transportation, storage, and handling of commodities, as well administrative expenses deemed appropriate by the secretary of agriculture. As a result of the congressional action, USDA agreed to consider renegotiating agreements that it had already concluded with some of the PVOs if they so desired.

[120]According to USDA, direct administrative headquarters' costs could not be covered. USDA allows for indirect headquarters costs to be covered through provision of Indirect Cost Recovery principles.

Top Food Aid Donating Countries

This appendix provides details on the top food aid donating countries in recent years. Table 18 lists the top 20 food aid donors based on shipments for the period 1995 through 1999. Apart from the United States, which supplied more than half of all deliveries, the other 19 donors provided about 43 percent of the food assistance during this period.

Table 18: Top Food Aid Donors Based on Shipments, 1995-1999

Donor County/Organization	Average Annual Metric Tons (1,000)	Percent	Cumulative percent
United States	4,936	53.9	53.9
European Union	1,483	16.2	70.1
Japan	553	6.0	76.2
Canada	416	4.5	80.7
Australia	239	2.6	83.3
Germany	237	2.6	85.9
France	175	1.9	87.8
United Kingdom	129	1.4	89.2
China	128	1.4	90.6
Italy	119	1.3	91.9
Netherlands	113	1.2	93.2
Denmark	91	1.0	94.1
Sweden	82	0.9	95.0
Norway	52	0.6	95.6
Switzerland	48	0.5	96.1
Belgium	41	0.4	96.6
Spain	18	0.2	96.8
Greece	15	0.2	96.9
WFP[a]	14	0.2	97.1
Finland	12	0.1	97.2
All other	254	2.8	100[b]
Total	**9,155**	**100[b]**	

[a]Includes only WFP quantities purchased from its own funds.

[b]Numbers may not add to 100 due to rounding.

Source: GAO analysis of the U.N. Food and Agriculture Organization data on food aid shipments.

Key GFEI Events from Announcement of Concept to Notification of Project Approvals

This appendix outlines key events related to the GFEI pilot from the time the program was announced until early January 2001, when USDA notified proposal winners.

As table 19 shows, USDA's expedited schedule allowed interested cooperating sponsors at most 8 business days to prepare and submit the first part of the proposal. Sponsors who began preparing for the second part of the proposal at the earliest possible time (i.e., without waiting to learn whether they qualified to do so), had a maximum of 18 business days to complete and submit it to USDA.

Table 19: Key GFEI Events from Announcement of Concept to Project Approvals

Date	Event
Feb. 27, 2000	Ambassador George McGovern proposes that the United States take the lead in organizing a worldwide school lunch program and a supplementary feeding program for pregnant and nursing women and their children under the age of 5 (article in the *Washington Post*).
May 26, 2000	President Clinton decides to go forward in principle with the proposal for a universal school lunch program.
July 11, 2000	Decision memorandum prepared for the president on international school feeding proposal.
July 23, 2000	President Clinton announces, at G-8 Summit, USDA GFEI pilot program to improve student enrollment, attendance, and performance in developing countries; challenges other donor countries to support a global program.
August 17, 2000	USDA met with interested PVOs and provided an advance draft notice of the *Federal Register* notice.
Sept. 6, 2000	USDA notice in the *Federal Register* invites proposals from cooperating sponsors to carry out GFEI activities.
Sept.15, 2000	Deadline for cooperating sponsors to present an initial submission that contained only information intended to demonstrate the organizations' administrative capabilities.
Sept. 22, 2000	USDA announces the cooperating sponsors selected to present detailed proposals for specific GFEI projects.
Sept. 29, 2000	Deadline for invited sponsors to present second submission to USDA.
Oct. 12, 2000	Deadline for USAID internal review and scoring of GFEI second-stage proposals.
Oct. 27, 2000	Initial Foreign Assistance Policy Committee (FAPC) Working Group meeting discusses which proposals to recommend for approval by the committee.
Nov. 2-3, 2000	FAPC Working Group meeting reaches consensus on which proposals to recommend for approval.
Nov. 9, 2000	FAPC decides which proposals will be approved.
Dec. 28, 2000	USDA announces approved PVO proposals and number of approved WFP proposals.
Jan. 5, 2001	USDA sends letters to individual PVOs advising them of results of the evaluation process.

Source: GAO analysis.

Comments from the U.S. Department of Agriculture

Note: GAO comments supplementing those in the report text appear at the end of this appendix.

United States Department of Agriculture

Farm and Foreign Agricultural Services

Foreign Agricultural Service

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Stop 1034
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20250-1034

Mr. Loren Yager
Director, International Affairs and Trade
U.S. General Accounting Office
441 G Street, NW, Room 4932
Washington, D.C. 20548

FEB 8 2002

Dear Mr. Yager:

Thank you for the opportunity to respond to the General Accounting Office's (GAO) draft report to Congress on the Global Food for Education Initiative (GFEI). The U.S. Department of Agriculture (USDA) welcomes the opportunity to review the lessons learned from the pilot phase of the GFEI program. However, we believe that the GAO has taken an overly critical view of how USDA administered the GFEI given the time and resource constraints. Also we believe the report fails to recognize that the President directed a school feeding program, not an entire educational program. Our comments on a number of issues raised in the report are outlined below. We are also developing a list of technical corrections, which will be forwarded to you separately.

Short Time Frame for Program Implementation

USDA's Foreign Agricultural Service (FAS) assumed responsibility for administering a pilot Global Food for Education Initiative in response to the Presidential Directive announced on July 23, 2000. At that time, FAS was also administering an exceptionally high level of food assistance under the Section 416(b) program. Nevertheless, FAS moved quickly to implement the GFEI without requesting additional staff resources. Within three months of the President's announcement, FAS developed program criteria and issued a *Federal Register* notice detailing procedures for selecting proposals under the GFEI. By December 2001, FAS had evaluated the institutional capacity of 33 private voluntary organizations (PVOs) and subsequently, with an inter-agency working group, reviewed and ranked about 60 proposals. Of those, 49 programs in 38 countries were selected and commodity shipments began in the summer of 2001.

Food for Education Versus School Feeding

See comment 1.

The GFEI has three purposes -- to improve student enrollment, attendance, and performance. Given the time and funding limits, USDA believed that the only feasible goal for the one-year pilot was a school feeding program to increase school attendance and enhance students' ability to learn. The report, however, emphasized the educational component of the program and has evaluated FAS against an unrealistic standard regarding that performance element rather than the other two objectives. A much longer time frame (at least three to five years) would be required to address all of the educational factors mentioned in the report including teacher training, infrastructure, learning materials, health and nutrition programs, and community involvement.

USDA is an Equal Opportunity Employer

Measurements to Evaluate the Pilot

Within the context of a one-year program, USDA included realistic measurements to evaluate proposals and program impact. Measurement criteria as outlined in Table 1 of the report were not required due to the time limitation and the uncertainty of the future of a school feeding program. Upon request, USDA received feedback from the PVOs concerning the inability to adequately measure learning progress within a one-year pilot effort. USDA implemented a school feeding program to increase the attendance and enrollment of school children in the targeted communities. Being a pilot program, participating organizations were given the flexibility to address specific needs and constraints within their countries of expertise. Each agreement will be evaluated independently once agreement objectives have been met. These program evaluations will then be incorporated into the broader GFEI program review.

Partnerships and Staffing

USDA views private voluntary and international organizations as valuable partners in implementing USDA food aid assistance throughout the world. USDA is only able to implement large programs by relying on the resources of their partner organizations and their in-country experience. Program controls are maintained by completing enforceable agreements and monitoring and evaluating programs. This private-public partnership was essential in initiating the $300 million pilot GFEI initiative within a year's time. GAO notes that FAS experienced staffing issues and received no additional staffing resources during the implementation. The staff shortages and the need to maintain quality slowed the negotiation of agreements.

Donor Support

While additional donor support is important for a large, global effort, local government support is critical for program implementation and sustainability. The GFEI program for Honduras provides an example of this local support. The Honduran Minister of Education will be asking USDA for technical assistance and support in the development of a permanent countrywide school feeding policy to be fully implemented in four years. The country's request is based on the positive progress of the Honduras GFEI program's operation and the regional coordinator's facilitating role. USDA hopes to work with the government of Honduras to support their school feeding goals. As our regional coordinators continue to visit with the governments involved in the GFEI program, USDA hopes to see more donor support and local support including school feeding policies.

3

FAS Management Capabilities of Development & Food Assistance Programs

See comment 2.

The GAO report incorrectly states that USDA lacked expertise in managing development and humanitarian assistance such as food aid. In fact, USDA has substantial expertise and long experience in managing international development and assistance programs including Public Law 480 (since 1954), Food for Progress and Section 416(b) (since the mid-1980s). The Foreign Agricultural Service's International Cooperation and Development area also has considerable expertise in international development programs including education, scientific research and technical exchange. The Food and Nutrition Service of USDA administers the nation's successful school lunch program. (See Attachment 2 for further description of expertise provided by USDA agencies.) FAS has also reached out to agencies outside USDA for assistance in the educational component of implementing the GFEI. These include the Agency for International Development and the Department of Education. Additionally, FAS drew upon the technical expertise of organizations such as the World Food Program and international PVOs with a history of operating overseas school feeding and educational programs.

All of the agencies noted above provided input on developing realistic and measurable criteria that could be addressed within the limited time frame. Additionally, these agencies, as well as our embassy teams overseas, took part in the proposal review process and had the opportunity to provide input on the educational, nutritional, and developmental factors involved.

Proposal Phase Versus Agreement Phase

See comment 3.

The GAO report focused on the inadequacies of the proposals submitted to USDA. It is important to note that the proposal is the beginning text of a negotiated contractual process. Once this negotiation has been completed, the signed agreement fully explains the activities to be implemented and meets all regulatory requirements.

The Federal Register notice provided guidance on the minimal content of proposals. Very little time was provided to the organizations that responded to this solicitation. Yet, many PVO proposals that were approved exceeded the minimal information required. In fact, the information outlined in Table 1 of the report captures the key elements that GAO would have recommended as proposal review criteria. While FAS did not require this information, Table 2 of the report shows that many of the proposals did in fact contain information not required by FAS but suggested by GAO.

The PVOs and USDA added other requirements and ensured that performance targets were included in the final agreements. USDA believes that GAO's comparisons between proposals and the recommended program elements understate the quality of the GFEI programs. Comparisons between the final agreements and recommended program elements are more accurate.

Differences between Private Voluntary Organizations and the World Food Program

See comment 4.

There is an inherent difference in operating with PVOs and a United Nations organization such as the World Food Program (WFP). The United States sits on the WFP Executive Board, which approves all projects, including budgetary requirements, but the U.S. is not part of any PVO boards. Additionally, it is through this WFP Executive Board that operating procedures and practices governing the WFP are established. Monitoring and evaluation procedures are integral to this process. Based on GAO's draft report, USDA is confident that the information submitted by WFP contains the required information listed in the Federal Register notice or the regulations governing USDA food assistance programs.

Processes to Prevent Disincentive Effects of Food Aid

See comment 5.

The GAO report provided suggestions for improving the analysis of disincentive effects of food aid such as reviewing the impact of donations on alternative food sources. While this can certainly be a goal for future projects, FAS stands by the analysis that significant market disruptions do not result from the GFEI pilot. On the contrary, in places such as Georgia, the pilot program has expanded flour consumption by local bakeries and also increased employment in these bakeries.

See comment 6.

Also, the statement that PVOs would be biased in their analysis because they would like to provide the food aid is correct, but in the opposite direction suggested by GAO. The PVOs have to implement their program within a community. Program success depends upon community support which is not going to occur if markets are disrupted. PVOs are therefore going to more rigorously analyze the food needs of an area and the potential market impact of a program to assure the acceptability of the commodity and the project's success.

We appreciate this chance to review and evaluate the critical components of an effective school feeding program and of a food for education initiative. A better understanding of these components should be useful to members of Congress as they consider the future of this pilot program.

Sincerely,

Mary T. Chambliss

Mary T. Chambliss
Acting Administrator

Attachment

The following are GAO's comments on the letter from the Department of Agriculture dated February 8, 2002

GAO Comments

1. USDA noted that GFEI has three purposes – to improve student enrollment, attendance, and performance, but indicated it is not possible to improve learning in a 1-year pilot program. According to USDA, GAO evaluated USDA against an unrealistic standard—performance—rather than the objectives of enrollment and attendance. In addition, USDA said, a much longer time frame would be required to address all of the factors mentioned in the report (examples cited include teacher training, infrastructure, learning materials, health and nutrition programs, and community involvement). We disagree with USDA's statements for two reasons. First, our conclusion is that school feeding programs are more likely to improve enrollment and attendance, as well as learning, if they are carefully integrated with other key factors and interventions. Second, we conclude that the pilot program could have been improved by determining in advance which proposals were for communities where key factors were already in place or would be addressed during the projects themselves.

2. USDA disagreed with our statement that USDA lacked expertise in managing development and humanitarian assistance such as food aid. We have revised that statement to specify expertise in food for education development programs. At the same time we note that a recent USDA study of its food aid monetization programs cited difficulty evaluating the programs' impacts because of limited personnel resources, high staff turnover, and increasing demands to implement large food aid programs. In addition, the limited presence of overseas agricultural attaches has adversely affected USDA's ability to oversee some of its sponsors' monetization projects, the study said. USDA's Inspector General has also expressed concern about this matter.

3. USDA said it believes that GAO's comparisons between the proposals and the recommended program elements understate the quality of the GFEI programs, since the proposal is only the beginning text of a negotiated contractual process. We focused on the proposal process to determine to what extent USDA secured information for judging and selecting proposals that offered greater promise of improving school enrollment, attendance, and learning.

4. Regarding differences in the treatment of PVOs and WFP, USDA reiterated (as discussed in our draft report) that the United States sits on the WFP Executive Board, which approves all projects. However, executive board approval does not mean that the United States may not have concerns about a particular project. As USAID advised, even when the United States concurs with an executive board decision to approve a project, the United States frequently states its concerns or reservations about the feasibility or sustainability of program activities and, according to USAID, has done so in the case of school feeding projects. USDA also said it is confident that the information submitted by WFP contains the required information listed in the Federal Register notice or the regulations governing USDA food assistance programs. However, WFP did not have to address requirements of the Federal Register notice; the notice did not require as much information as we believe would have been useful for evaluating proposals; and USDA's 416(b) regulations did not include specific information requirements for assessing food for education programs.

5. USDA indicated agreement with our finding that analysis of the disincentive effects of food aid projects should include the impact of commodity donations on alternative food commodities. USDA said doing so could improve analyses and be a goal for future projects. At the same time, USDA said it stands by the pilot project assessments that significant market disruptions will not occur—even though such analysis was not conducted.

Our report notes that cooperating sponsors are responsible for analyzing the potential disincentive effects of their projects and that USDA does not independently verify the results of such analyses. In addition, we noted that USDA officials acknowledged that because PVOs want to provide the food aid, these organizations may not be completely unbiased in preparing analyses of disincentive effects. In its letter, USDA said the latter statement is correct but in the opposite direction suggested by GAO. According to USDA, PVOs are going to more rigorously analyze the food needs of an area, because program success depends upon community support, which is not going to occur if markets are disrupted. We agree that the latter is one possible interpretation of the statement and therefore removed the statement from the letter.

Comments from the U.S. Agency for International Development

U.S. AGENCY FOR
INTERNATIONAL
DEVELOPMENT

FEB 11 2002

Mr. Loren Yager
Director
International Affairs and Trade
U.S. General Accounting Office
Washington, DC 20548

Dear Mr. Yager:

I am pleased to provide the U.S. Agency for International Development's (USAID's) formal response on the draft GAO report entitled "FOREIGN ASSISTANCE: Global Food for Education Initiative Faces Challenges for Successful Implementation" (January 2002).

The report accurately and fairly depicts the complex and formidable challenges confronting the Global Food for Education Initiative (GFEI). USAID fully endorses GAO's recommendations on matters for congressional consideration (p.44). The findings and recommendations of this report should be of great use to the Congress as it debates the structure of U.S. food assistance.

As the report acknowledges, USAID has extensive experience in school feeding and food for education activities. USAID shared its experience, including results on current USAID food for education programs, with USDA as the pilot was designed. USAID's comments, much of which dealt with the cost and the need for complementary programs, were well received. Nevertheless, priority was given to getting a program up and running. The designers believed improvements could then be made that would deal with the issues of cost, sustainability and the need for complementary programs.

While endorsing the basic analyses and findings of the report, we have some points of clarification that we are enclosing in this letter.

1300 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20523

Thank you for the opportunity to respond to this GAO draft report and for the courtesies extended by your staff in the conduct of this review.

Sincerely,

John Marshall
Assistant Administrator
Bureau for Management

Enclosure: a/s

Comments from the Office of Management and Budget

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

February 8, 2002

Mr. Loren Yager
Director
International Affairs and Trade
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Yager:

Thank you for providing the Office of Management and Budget the opportunity to comment on the GAO's draft report, *Global Food for Education Initiative Faces Challenges for Successful Implementation*.

The report is balanced and generally accurate, and will serve the Congress and the public in future deliberations about school feeding programs. The report criticizes the GFEI pilot program undertaken by the Department of Agriculture (USDA) for 1) failing to adequately incorporate lessons learned from previous school feeding programs; 2) exhibiting weaknesses in structure, planning and management; and 3) failing to generate support from other nations. While the report presents evidence for these conclusions, it is worth emphasizing that these problems may be attributable to the urgency with which the pilot program was generated. It is also worth noting that greater emphasis was placed on the nutrition goals of the pilot—as distinct from education objectives. One could expect that some of these problems could be addressed by a more deliberate approach to performance and evaluation.

The report's description of international reluctance to support the pilot program is troubling. It appears that the short-term funding mechanism, using USDA authority, may limit the program's effectiveness in several ways. This includes discouraging foreign donations that are vital to a broad-based, sustainable program. In addition, there appear to be problems with USDA's legal authority to make certain payments to the World Food Program (WFP). These problems are mentioned in a USDA letter to the WFP on January 16, 2001, and the subject of US negotiations with the WFP.

The Administration cares about feeding and educating vulnerable children, and therefore, we intend to undertake a careful evaluation of the pilot. It is important to learn from this and other school feeding efforts. The GAO report is a valuable step toward making sure we get the results we intend from this program and making humanitarian aid more effective for those in need.

Detailed technical comments are being provided separately.

Sincerely,

Marcus Peacock

Marcus Peacock, P.E.
Associate Director
Natural Resource Programs

GAO Contacts and Staff Acknowledgments

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Acknowledgments

In addition to those named above, Gezahegne Bekele, Janey Cohen, Stacy Edwards, Mary Moutsos, and Rolf Nilsson made key contributions to this report.

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