

Listening to Schools: Insights to Inform the Development of a Toolkit for Implementing the
20-Minute Lunch Duration Rule in Washington State Elementary Schools

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I. Introduction

School meals are a consistent part of students' days, supporting more than just nutrition. Lunchtime gives children the chance to eat, socialize, and practice executive functioning skills that support them throughout the rest of the school day. Elementary school students often have inadequate time to eat due to travel time to the cafeteria, time spent waiting in line, and cafeteria crowding.¹ When students have less time to eat, they consume fewer nutrients and waste more food.² Longer lunch periods are associated with a higher intake of vitamin A, iron, and calcium-rich foods, which are important nutrients for growth and development.³ Moreover, school lunch provides important opportunities for kids to interact socially and contributes to the development of social skills and positive feelings about school.⁴ These findings highlight that implementing a longer lunch period supports increased consumption of nutritious foods and provides students with more opportunities to practice social and self-regulation skills that contribute to their overall development.

In Washington State, a new 20-minute lunch duration rule for grades K-5 (WAC 392-157-125) will take effect in the 2029–2030 school year, ensuring that all elementary school students have enough time to eat. While most parents and administrators agreed that longer lunches are beneficial during the public comment period, Washington school districts vary widely in their operations and constraints, and implementing this rule will require support and adjustment. To prepare for the transition, the Washington Office of Superintendent of Public Instruction (OSPI) collected statewide survey data during the 2025 School Meals Annual Training. The survey showed just how much lunch period lengths vary across districts, with some having average lunch periods over 25 minutes and others having lunch periods of less than 14 minutes. Respondents included food service directors, managers, supervisors, chefs, and registered dietitians. They pointed out the benefits of longer lunches but also raised concerns about potential implementation barriers, including scheduling complications, staffing issues, budgetary constraints, facility limitations, and competing instructional demands.

Building upon the survey findings, the Capstone Team conducted in-depth interviews with representatives of School Food Authorities (SFAs) across Washington to obtain insights on potential barriers and facilitators for the implementation of the 20-minute lunch rule. School districts were chosen to reflect diversity in urbanity, school size, and the current average length of lunch periods. Speaking with respondents working in these varied environments allowed for a better understanding of where challenges show up, what is already working well, and what kinds of support districts need. The insights gained from the interviews informed the Capstone Team's recommendations to OSPI and will help in the development of a practical toolkit to support schools for the upcoming statewide implementation.

II. Literature Review

Policy Context

Currently, there is no national mandate for school lunch period length. In many U.S. public schools, this has left students with insufficient time to eat and refuel for the remainder of the school day. Numerous researchers and institutions like the Centers for Disease Control have recommended that schools provide “at least 20 minutes of seat time for students to have their meal and socialize.”⁵ With this understanding of best practice regarding lunch duration, many schools have opted to offer longer lunch durations, averaging at least 30 minutes to meet recommendations, regardless of required mandates.⁶ However, schools are more likely to implement these recommendations when there are strong state-level policies in place. A study analyzing how the presence of state laws influence school lunch durations found that the prevalence of schools that provided students with at least 30 minutes of lunch was 43% in states with laws that addressed this issue versus 27.1% in states without such policies.⁶ These findings highlight the need for stronger, clearer state policies to ensure that all students receive adequate time to eat.

Lack of a mandate around school lunch period lengths has resulted in considerable variability in the amount of time students have to eat their meals relative to the length of the lunch period. For example, a 2016 study using data from six elementary and middle schools in an urban, low-income school district in Massachusetts showed significant differences in the amount of time students had to eat their meals, ranging from 10 to 33 minutes (mean 23.9 minutes).¹ In schools where students had a 30-minute lunch period (n=561), approximately 61% of students had less than 25 minutes to eat after receiving their meals, while 9% had less than 20 minutes.¹ Similarly, a 2023 study at a K-5 school in Lynchburg, Virginia, investigated seated times for students across 5 observation days, for students first in line and students last in line.⁷ They found that students who were first in the lunch line had an average seated lunch time that ranged from 14:48 minutes among 5th graders to 17:48 among 1st graders.⁷ Students who went through the line last had an average seated lunch time ranging from 12:24 among 5th graders to 17:00 minutes for kindergartners.⁷ Finally, students who brought packed lunches had a seated lunch time of 12 to 25 minutes, with an average of 18:21.⁷

Effects on Food Group Consumption, Nutrient Consumption, and Waste

Research suggests that when elementary and middle school students have more time to eat, they consume more food groups and nutrients.⁸ For example, one study found that elementary and middle school students in Massachusetts (n=1001) were more likely to select a fruit and consumed more of their entrées, vegetables, and milk if they had at least 20 minutes of seated lunch time.¹ Similarly, in another study, researchers randomly assigned 38 elementary and middle school-aged children at a summer camp in Illinois to a 10-minute or 20-minute seated lunch condition for a period of 20 days.² The results showed that children with 10 minutes of

seated lunch time consumed significantly less fruit and vegetables compared to students with 20 minutes of seated lunch time.²

When students consume less fruits and vegetables, they miss out on important micronutrients that are essential to their growth and development. Fruits and vegetables are important sources of vitamins A, K, and C, as well as folate, magnesium, potassium, and dietary fiber—all of which children need in order to thrive.⁹ In 2004, a group of researchers compared nutrient intake at two comparable elementary schools over a 10-day time period.³ One of the schools had a lunch period of 30 minutes, while the other had a lunch period of 20 minutes. The researchers found that students with a 30-minute lunch period consumed more vitamin A, iron, and calcium-rich foods compared to those with a 20-minute lunch period.³ Additionally, there were significant differences in the amounts of carbohydrates, protein, and fat consumed by students at each school.³

Furthermore, research indicates that when students have more time to eat, they waste less food. A 2024 study using data from 134 schools in 24 states found that elementary school students with 30 minutes of lunch time generated 17% less plate and beverage waste compared to students with less than 30 minutes of lunch time.¹⁰ Younger students wasted more food, as well as students with lunch periods earlier in the day (before 11 am).¹⁰

Barriers and Facilitators of Supporting Whole-Child Education

What happens in the cafeteria can also support whole-child education. Lunchtime, along with recess, is one of the few periods in the school day when students are able to freely connect with one another. In a 2021 mixed-methods study conducted in the Anchorage School District, 6 teacher-based focus groups (n=39) were assembled to determine the holistic effects of a wellness initiative, which included a 20-minute lunch period, a 10-minute breakfast period, and 54 minutes of active time.¹¹ The study found that longer lunch periods, when paired with recess and “other movement opportunities,” increased students’ self-reported happiness in the cafeteria.¹¹ Analysis of interviews and focus groups conducted with parents and school staff found “reductions in disciplinary issues,” improvements in social and emotional learning, and greater “overall student happiness and well-being.”¹¹ Additionally, teachers felt that longer lunches provided English as a Second Language (ESL) students with more opportunities for language development through conversations with their peers.¹¹

Teachers who had fewer responsibilities as a result of the wellness initiative, such as needing to assist in a 5- to 10-minute lunch transition period or alternating lunch period supervision, reported more positive interactions with students and felt that they were able to get to know the students better.¹¹ On the other hand, teachers who were assigned greater responsibilities—such as supervising the entire lunch period—reported that the added duties were exhausting and reduced the time they had for professional development and collaboration.¹¹ They were also less willing to volunteer for other student activities, both during and after school.¹¹

A number of states—including Maine, Rhode Island, and Vermont—are considering legislation to establish a minimum duration for school lunch periods.¹² While several states require that schools provide students with “adequate time to eat,” the phrase is often undefined and inconsistently applied.¹³ Washington, Nevada, South Carolina, and West Virginia have adopted or are adopting rules that guarantee students at least 20 minutes to eat once they receive their meals.^{14–16} This policy is expected to benefit students by giving them more time to consume nutrients that support learning and growth, reduce food waste, and develop social and emotional skills.

III. Methodology

Semi-structured interviews were conducted among representatives of school food authorities across various Washington school districts. The goal of these interviews was to identify barriers and facilitators for the implementation of the 20-minute lunch duration rule in K-5 schools, in order to inform the development of a toolkit to support such implementation.

Interview Guide Development

A semi-structured interview guide was designed to gather stakeholder perspectives, identify barriers and facilitators, and ground recommendations for the development of the toolkit.

As a first step for the interview guide development, a qualitative content review was conducted on [OSPI’s Concise Explanatory Statement for Chapter 392-400 WAC](#). This document summarizes the public comments OSPI received related to the rule, as well as OSPI’s response to each comment. The document included comments from a range of stakeholders, including parents, teachers, administrators, food service directors, and superintendents, which OSPI categorized as either supporting or opposing the proposed rule. Comments were then further organized into subcategories by the Capstone Team to capture key topics raised across responses. Identified categories included general support or opposition, nutritional and social benefits, budgetary and staffing concerns, scheduling and transportation challenges, local control, equity and behavioral considerations, facility limitations, and conflicts with recess or instructional time. The frequency and distribution of comments across these categories were recorded to identify the principal areas of stakeholder concern.

To further understand the implementation of elementary school lunches in Washington state schools, the Capstone Team visited two Seattle schools to observe the lunch period for K-5 students. During this observation, the Capstone Team recorded how long it took for students to obtain their lunches from the service line, and the amount of time students had to eat (measured from the time when the last student received their lunch to the end of the lunch period). These visits allowed the Capstone Team to witness the speed at which lunch is served and consumed, as well as the challenges experienced by school staff in the cafeteria. Insights gained from the observations further informed the development of the interview guide.

The first draft of the interview guide, designed for school districts in which all elementary schools already have a lunch duration of at least 20 minutes, included an introduction section, providing background information about the project as well as language regarding anonymity and confidentiality, followed by 11 questions. The first two questions were designed to elicit information about the interviewee’s context, including how long the interviewee had been in their position and their responsibilities, as well as how K-5 schools in their district typically operate lunch periods. Probes regarding lunch period operations were developed based on concerns identified during the review of public comments. The rest of the questions focused on the interviewee’s perceptions of the 20-minute lunch duration rule, and barriers and facilitators they experienced implementing a longer lunch duration. Probes for these questions drew on common concerns found in the review of public comments, such as budget limitations, staffing needs, and scheduling concerns. Adaptations to this version were made to make the script appropriate for respondents in school districts where some elementary schools had a lunch duration of at least 20 minutes and for those where none of the schools had lunch durations of at least 20 minutes, resulting in three distinct interview guides.

The first interview guide draft was reviewed by the Capstone Faculty Advisor. Edits were integrated, and a question was added in the final section to learn about respondents’ beliefs about policymakers’ and school administrators’ knowledge/experience gaps regarding the implementation of this rule. The revised draft was then reviewed by OSPI. Based on their feedback, edits were made to the wording of questions and their order to improve clarity. A final draft of the interview guide was produced for respondents representing school districts where all elementary schools had a lunch duration of at least 20 minutes, as displayed in **Table 1**.

<i>Table 1. Interview Guide for Respondents in School Districts where <u>all</u> schools have a lunch duration of at least 20 minutes</i>
<p>Context and Current Practices</p> <ol style="list-style-type: none"> 1. To start, how long have you been at [school/school district] and in your current role? 2. Tell me about how schools in your school district operate the lunch period for grades K-5. <ol style="list-style-type: none"> a. <i>Probe:</i> Ask about how long lunch takes, what kind of staff is needed, recess timing, how kids pay for lunch b. <i>Probe:</i> Ask about flow (ie: entering/exiting, tray return, cleanup)?
<p>Perceptions about the 20-Min Rule</p> <ol style="list-style-type: none"> 1. What do you believe to be the purpose and/or goal(s) of the Lunch Duration for Grades K-5 rule? 2. From your perspective, how does having less than 20 minutes to eat affect students? <ol style="list-style-type: none"> a. <i>Probe:</i> What about specific groups of students? (ie: the youngest group or those with food allergies)
<p>Barriers & Facilitators/Support**</p> <ol style="list-style-type: none"> 1. You mentioned in an August interview to OSPI that your school lunch period lasts longer than 20 minutes. What about your school district makes it possible to have lunch periods of at least 20 minutes?

2. What are the benefits and challenges with a longer lunch period? What changes were made, if any, to facilitate lunch periods of at least 20 minutes?
 - a. Probes:
 - i. Physical / equipment /technology or layout changes?
 - ii. Menu or food preparation changes made?
 - iii. Scheduling / staffing changes?
 - iv. Logistical shortcuts?
3. What were the most helpful supports and resources schools used to create a longer lunch period?
 - a. Follow-up: Who did you need to talk to in your LEA (Local Education Agency) / School districts? How did you start these conversations?
4. We know that implementing any kind of new change or school policy can be tricky. What challenges did you or are you currently working through with a lunch longer than 20 minutes?
 - a. Probe: timing (instruction, recess, transition), budgeting, staffing, facilities, supervision
 - b. Follow-up: How did you handle these challenges?
5. What do you think school administrators might not fully understand about implementing a longer lunch period?
 - a. Follow-up: what about policymakers?
6. What advice would you give to other school administrators wanting to implement a longer lunch period?

Closing:

1. Is there anything else you would like to add before we conclude the interview?

*** indicates that questions in this section were adapted and re-worded to be appropriate for school districts where some, or none of the schools had implemented the 20-minute lunch duration rule.*

Interviews with Respondents

Prior to working with the Capstone Team, OSPI distributed a statewide survey data during the 2025 School Meals Annual Training to collect information related to lunch duration at schools. In this survey, OSPI also asked if respondents would be open to participating in the capstone qualitative interviews. A list of the school districts in which there was at least one individual who agreed to be interviewed was shared with the capstone group, along with key data about each school district.

From this list, a primary and secondary outreach list was created and sent to OSPI. Each list was created to attempt a balanced representation of school districts based on living environments (urban, suburban, rural, mixed), total school district enrollment, average duration of elementary school lunch periods, and the number of schools within the school district which already have a lunch duration of at least 20 minutes (all, some, none). The primary list contained a total of 17 school districts. The secondary list provided 14 additional school districts.

OSPI contacted the individuals from each of the selected school districts to confirm their willingness to participate and to gather information about their general availability. Contact information and availability of 14 confirmed individuals were shared with the Capstone Team and used to schedule interviews during business days from Tuesday, October 28th, to Friday, November 14th, 2025. Interviews took place over Zoom, with each interview having one

interviewer and one note taker. Permission to record and transcribe interviews was requested during the scheduling of interviews via e-mail exchange and was verbally confirmed at the beginning of each interview. Each interview lasted approximately an hour. If permission was given to record, a transcription was produced using Zoom or Microsoft Word.

A total of 13 virtual interviews were conducted, with 11 being individuals from the list of 14 shared with the Capstone Team. Two of the 13 total interviews were scheduled and conducted outside of the contact list shared by OSPI due to expressed interest in the project after hearing about it from a colleague. Two respondents declined to have their interview recorded; for these two interviews, the interviewers made efforts to take more detailed notes to record their responses and insights.

Data Management and Analysis

A codebook was developed for data analysis using an inductive approach. After the first several interviews had been conducted, transcripts were reviewed to identify commonalities in topics and perspectives to add to the codebook. Codes with commonalities were categorized together with a parent code, and larger concept codes were refined with more specific child codes. Each code was accompanied by a written description to ensure consistent application across coders. To establish a shared understanding, the Capstone Team jointly coded a sample transcript and discussed any discrepancies in interpretation. Feedback from this exercise was used to clarify code definitions and ensure reliability before proceeding with full data analysis.

The finalized codebook was uploaded into Dedoose, a qualitative research software, for data organization, coding, and visualization of relationships and code co-occurrences. A qualitative descriptive analysis approach was used to analyze the interview data. This analytic method was selected because it aligned with the primary aim of the study: to identify potential barriers and facilitators to implementing the 20-minute lunchtime rule in order to inform the development of an implementation toolkit. Qualitative description is well-suited for applied health and education research in which the objective is to generate straightforward, low-inference summaries of stakeholder experiences, needs, and challenges.¹⁷ Unlike more interpretive approaches such as thematic analysis, qualitative description prioritizes staying close to participants' language and producing findings that reflect how stakeholders actually describe their environments, decision-making processes, and constraints.

After all interviews were conducted and coded, the data was analyzed to find frequent codes, reflecting recurring patterns across interviews. Five overarching findings were identified to be most relevant in terms of barriers and facilitators to implementing the lunch duration rule. Representative quotes were then selected to explain and illustrate each finding in the results narrative.

IV. Results

The qualitative interviews conducted by the Capstone Team revealed a range of experiences and perspectives related to implementing the 20-minute lunch duration rule across school districts in Washington State. Stakeholders from 13 school districts participated in the interview process; of those, two districts had lunch periods longer than 20 minutes in all their elementary schools, seven had some schools with a lunch period longer than 20 minutes and three had none. The sample included a balanced mix of rural and urban districts (6 urban, 3 suburban, 2 rural, 3 mixed) and district sizes ranging from <1,000 to over 29,000 students (1 under 1,000, 3 schools with 2,000 to 5,000, 4 schools with 5,000 to 10,000, 3 schools with 10,000 to 15,000 students, 1 from 20,000-25,000 students, and 1 from 25,000 to 30,000 students). Although the participating districts varied in size, geographic location, facilities, staffing structures, and lunch practices, five descriptive topics consistently emerged that reflected both current and anticipated barriers as well as potential facilitators for the implementation of the 20-minute lunch duration rule.

Funding and budgeting emerged as a major challenge, as union considerations, increases in staff hours, and potential facility upgrades all place pressure on already limited budgets.

Facilities and equipment were also frequently discussed, highlighting the constraints posed by multipurpose spaces and the creative workarounds districts use to manage space limitations.

Staff availability – both for food service and lunch supervision – was a widespread concern, with many districts navigating contractual limits while trying to meet increased supervisory needs.

Scheduling and time management were also brought up repeatedly, with many respondents noting limitations related to instructional requirements, long lunch lines, and transition periods that cut into students' actual lunch time. Finally, respondents reported that strong **communication and collaboration** brought stakeholders together early, allowing districts to test changes, share perspectives, and lean on individuals' strengths in relation to implementing longer school lunches. Buy-in from administrators, teachers, staff, and families shaped how adaptable schools were in adjusting lunch routines and considering new approaches. Table 2 below displays additional sample quotes for each of the cited qualitative descriptors, grouped as facilitators or barriers.

The sections that follow take a closer look at each topic, drawing on interview insights to illustrate the specific challenges and facilitators districts described in these areas.

Funding and Budgeting

Funding and budgeting was the most consistently mentioned topic, with all respondents but two from a large-sized urban and small-sized suburban school district mentioning it during their interviews. As one respondent from a large-sized urban district stated: "It is unfortunate, with these finances, that we have to make these tough decisions. More funding makes more opportunities, but they are very hard to come by at this time." Similarly, a respondent from a small-sized suburban district said, "I don't know how that can happen, but if there is additional

funding potentially tied to it, that would be incredibly helpful, and I think that is the biggest thing that I've heard, is that if it was a funded mandate that it would be possible, but having it be unfunded is going to be the challenge.”

Furthermore, funding and budgeting were frequently discussed in conjunction with three other topics: equipment, scheduling and time management, and staff availability. Much concern was shared around adjusting the lunch service, especially in larger sized schools, to accommodate a large volume of students efficiently by either having multiple access points for the meals, adding a second lunch line, or having enough support staff to manage one lunch line and supervise the meal time accordingly. In terms of time management, a respondent from a large-sized urban district asserted, “I'm saying that's if you have to feed them in the lunch room. Or you're decreasing the PE time or...the recess time... you know, to make it all work... there may be a cost involved in implementing this that they're not funding,” alluding to the hesitation that many schools have in allowing lunch to be eaten inside the classroom, as an alternative to extending the school day. Moreover, another respondent from a large-sized urban school district said, “to make that happen, it could mean having more kids during the lunch period, but... I think we're pretty at capacity right now with how that looks, so I don't envision that being able to change much unless kids were able to go back and eat in a classroom, but then that impacts the teacher's lunchtime as well. So... yeah, I think the biggest thing would be how do we add more time, and how do we pay for it?” Relatedly, a respondent from another large-sized urban district expressed that “additional supports in the cafeteria also play a role, so the longer the lunch time is, you know, the more staff time you're going to have for those campus safety staff or custodial staff, potentially. They're operating on limited budgets.” This quote alludes to the additional resources required to fund personnel time needed to have longer lunch periods. Finally, a respondent from a large-sized urban school district emphasized that schools are doing their best to keep students safe with limited resources, saying “I think that's our biggest problem right now, is finding those resources, human resources, those capital resources, to make sure that kids are safe.”

Funding-related topics were primarily identified as barriers as opposed to facilitators, with the majority of the concerns coming from respondents from large-sized urban school districts. However, excerpts like the following quote show a willingness to adapt and leverage mutual understanding: “I honestly think primarily it's a time and budgetary challenge for us. I think people are bought into the idea that kids need more time to eat, but it's just how to do that with the constraints of the day. And so, I would think... It would just have to be discussions with our Executive Director of Business and Finance. He would be the one that would be ultimately in charge of checking the budget to see how that's feasible and then allocating that time to each school.” Other respondents provided possible avenues to explore to work around budgetary constraints. One respondent referred to the success of the “breakfast-after-the-bell” program and possibly applying the lessons learned from that program to this rule, saying “as far as funds go, like I, I really think about breakfast in the classroom and all of the money and I don't know if the infrastructure, but it's the money and the resources that have been put behind breakfast in the

classroom. I think it needs that level of support to make this go effectively, right? And like, there's annual right now, at least what I've seen is that there's annual grant opportunities out there...there needs to be opportunities that districts can apply for those funds because most food service operations don't have it. And the onus is going to go back on the food service operation.” Another respondent talked about community resources they were able to garner for other initiatives and stated “Yeah, so we've used United Way of [name] County. They've actually been helping, even though we're in [name] County, we still use them as a resource. It wasn't necessarily for a 20-minute bell time...or seat time, but it was for, we did a breakfast after the bell program that they helped us with, but I do know that they would be totally willing to help us if needed.”

Facilities and Equipment

The respondents frequently identified equipment and facility constraints as major barriers. Facility-related challenges were mentioned in 10 of the 13 interviews, on repeated occasions throughout those 10 interviews. Equipment limitations were also noted in 7 of the 13 interviews, often interwoven with broader space and layout concerns.

Many respondents described the school facilities – particularly the multipurpose rooms used for dining, gym, assemblies, and other functions – as not suitable for a longer lunch duration. This is because the spaces must constantly be rearranged, making it difficult to maintain a consistent lunch setup and minimize transition times. One respondent from a small rural school district with all of their schools currently having a ≥ 20 -minute lunch explained, “[The multipurpose room] is a dysfunctional space because it tries to be everything, but it’s not good at any of it... We’re always balancing the needs of the gym classes before [lunch] and the gym classes after [lunch], and the stage [for performance arts].” Another respondent from a very large, urban school district with a majority of their schools having a ≥ 20 -minute lunch said, “You have breakfast, then you’re pulling all that down so you can set up for PE... then you’re turning around and setting it all up again so you can feed them lunch.” This continuous shifting of space use creates logistical bottlenecks that reduce time available for lunch. Several respondents emphasized that these space constraints alone could prevent the successful implementation of the rule.

The physical layout of the buildings, especially campuses where cafeterias are detached or where students enter from multiple external doors, can further complicate transition periods. One respondent from a large, urban school district with a majority of their schools having a ≥ 20 -minute lunch described the movement through their facility as “kids are coming from outside... there are entrances and exits all over the place... they enter in, they flow in, they’re being led usually by a para[professional], and they wrap around into the lunch line.” This quote demonstrates that the facility layout can increase transition time and cut into their lunch time. Furthermore, the students may need to wash their hands, take off jackets, etc., which may also increase the time to get to their lunch and have a full twenty minutes to eat.

Equipment-related constraints were often mentioned in conjunction with the facility constraints. Several respondents emphasized that seating time depends heavily on how quickly students can get through the service line, and that existing equipment was insufficient to meet this need. One food service director from a small rural school district with all of their schools having a ≥ 20 -minute lunch described the pressure to speed up service without the physical infrastructure required to do so as “It comes down to pressure on us to make sure those kids get through the line fast enough. Increasing our service line capacity is huge. We’re looking at creating a whole other service line...but we have an old cafeteria. There's not a lot of space.” They also echoed that outdated or inadequate equipment forced them to “piecemeal” solutions rather than implement improvements. For example, the same respondent stated, “with the right equipment, we could have a really streamlined service line...but I’m piecemealing it with what we have and equipment that really isn’t designed for that.” These statements identify that the equipment-related limitations ultimately slow down meal distribution, leaving students with less time to eat, even when staff are working as efficiently as possible. As several respondents emphasized, without the equipment needed to increase lunch line efficiency, schools may be unable to meet the 20-minute lunch after the last student receives their meal rule, regardless of scheduling adjustments or staff effort.

Equipment constraints as a barrier to implementing this rule also connect to the funding and budgeting constraints. Purchasing new equipment, such as mobile service lines, additional salad bars, or extra checkout stations, was described as cost-prohibitive, particularly because longer lunches do not generate additional revenue. This respondent from a very large, urban school district with a few of their schools having a ≥ 20 -minute lunch stated that “There are no funds or facilities to add a second lunch line. There is a lot of equipment and space that is needed... It's not like more kids are going to be eating the school lunch to help fund it.”

Both equipment and facility constraints were identified in the majority of the interviews. Multi-purpose rooms, cramped or outdated cafeterias, and limited service line capacity all restricted the ability to provide 20 minutes of eating time after the students receive their meals. For most respondents, the physical and material environment represented a foundational constraint that requires more than creative and flexible thinking, but rather more substantial investment or redesign to fully support implementation of the rule.

Staff Availability

Respondents consistently identified staff availability as a major barrier to implementing the 20-minute lunch duration rule. Twelve of the 13 respondents emphasized that the rule places additional strain on existing school staff and would require either hiring or designating dedicated lunch supervisory staff to meet needs. The respondent who did not describe additional need for lunch supervisory staff explained that their urban school has dedicated paraprofessionals to support lunch so teachers receive their full 30-minute lunch breaks. Currently, many schools rely on the generosity of teachers and administrative staff to provide lunchtime supervision,

sometimes cutting into their own 30-minute lunch breaks. Both rural and urban school districts described utilizing custodial staff to increase lunchtime supervision and have requested the help of “lunchroom playground helpers” and paraprofessionals, who normally facilitate transition times between recess and lunch. Respondents indicated that managing students during lunchtime is a tremendous challenge without dedicated supervisory staff, even when other staff make themselves available for relief support because “those staff are busy doing their own jobs” and cannot fully supervise the lunchroom. As described by a respondent from an urban school district, “it’s really hard to supervise [the students] when I got a ladle in my hand.” Additional support staff have been requested to administrators at districts that struggle with getting students through the lunch line to assist them with selecting food items, locating cutlery, paying for meals, opening milk cartons and plastic bags, etc. In one urban school, younger students are instructed to “raise their hand and ask someone to come help them,” which curtails students’ eating time if they are kept waiting for limited staff to come to their aid. Overall, the vast majority of respondents described a need for dedicated lunch supervisory staff, making implementation of this rule challenging.

From a food service perspective, limited staff availability was repeatedly mentioned as an additional stressor impeding schools from extending their lunch periods. Schools that have back-to-back lunch periods usually have no prep-time in-between lunches and must begin setting up the next lunch “from the time you’re done serving [each lunch period].” To accommodate this lunch schedule, one urban school district needed to divert a regional food service employee to their elementary school to increase their food service capacity. A respondent from an urban school described that they have one food service lead and two prep workers to make between 400-500 lunches a day across 3 lunch periods and that “it would be super helpful to have 3 food service workers instead of 2...having an additional hand to smooth everything out.” One respondent highlighted that food service staff “can memorize every kid [and]...get kids through the line really fast, but as soon as they’re out [of the lunch line],” support “comes to a screeching halt.” Increasing food service capacity alone does not address the need for more lunch supervisory staff because “it’s not [food service workers’ responsibility] to supervise kids.” Many schools’ lunch line flows rely on the expertise of only one or two staff members, an unsustainable model if lunch periods are to be lengthened and minutes spent supporting and supervising students are to be increased.

Scheduling and Time Management

Respondents frequently spoke about scheduling and time management as a challenge to work through for implementing the 20-minute lunch rule. Scheduling and time management were mentioned in some capacity in every interview, with instruction time, recess time, and transition time being the most common concerns throughout interviews.

Many respondents described the challenge as a balancing act between lunch, recess, and instructional time. It was often mentioned that there is limited time in the school day and “adding

more time to lunch would impact the amount of time that kids are able to be in the class, and meet those other requirements.” Additionally, many administrators from districts with a few of their schools having a ≥ 20 -minute lunch mentioned that there is a “concern that we may need to lengthen the school day. Because they still need to get in the required instructional time during the week.” Another challenge that was mentioned by some respondents was the use of transition periods to get children in and out of the lunchroom. One administrator said that, “to make that rule of 20 minutes, we have to really consider what the transitions are going to be like, and we have to get really, really clear, concise, and tight with our schedule. Uhm, and so, it's— that's gonna be the challenge, right?” This illustrates how the current schedules are tightly packed and leave little room for adjustment without significant structural changes.

In contrast, while scheduling constraints have posed some challenges, strategic scheduling and creative time management can be used as a facilitator to implementing the 20-minute lunch rule. One administrator who manages a school that has recess scheduled after lunch explained, “the way they've worked it is they've just basically let kids drift out to recess when they want. And so, if you do have a slower eater, they can almost use the lunchtime and part of recess to eat their food... they at least have the opportunity to sit there and finish their food, or socialize a little bit in the cafeteria.” Although not common, this approach can accommodate students who need extra time to finish their meals. Another creative solution suggested by an administrator from a district with few of their schools having a ≥ 20 -minute lunch was a program they piloted that allowed children to eat their lunch in the classroom after recess, stating “they would sit, and the teacher might do something like a read aloud. So instruction was going to be happening during this time... but they were also going to have a full 20 minutes to eat their meal.”

Additionally, respondents found that shortening transition times or staggering lunch start times has helped them extend the time their students have to eat without compromising instructional time requirements. One respondent noted, “longer lunches come from shortened transition times... 27-minute lunch times are the average for primary schools in this district.” Similarly, staggering recess and lunch start times reduces congestion and maximizes efficiency. One respondent from a large, urban school district stated that “flow is good because the lunches are staggered... a staggered system is very helpful in getting students to have 20 minutes for eating.” Additionally, this school district uses the recess before lunch model, citing “we mostly have recess before lunch for elementary students,” implying that children who get to go to recess first are more likely to sit and finish their lunch after. These examples illustrate that with intentional planning and flexible scheduling, schools can achieve the 20-minute lunch duration rule without significantly disrupting the academic day.

Communication and Collaboration

Communication, particularly its absence, emerged as a major topic in the data. Respondents in 10 out of 13 interviews discussed communication among school staff, followed by communication

between school staff and policymakers (7 of 13), and, less often, communication between school staff and parents (3 of 13).

Respondents described a lack of open communication among school staff as a barrier to implementing the 20-minute lunch rule. They explained that food service directors are often excluded from administrators' discussions about school lunch scheduling. According to one respondent from a small, suburban district, lunch schedules are determined by principals and food service directors "don't have any say in them" and are "forced to work with what they've come up with." Another respondent from a small, suburban district noted that administrators are "making suggestions or implementing things without directly communicating with the food service director, and those implementations may not work best for that school because they aren't aware of the details that make programs run smoothly."

Greater collaboration among administrators and staff was identified as a potential facilitator in 9 of the 13 interviews. According to one respondent from a medium-sized, urban district, "Don't just listen to administrators only. You've got to listen to the teachers. You've got to listen to the custodians and the paraprofessionals and the food service people to be able to make it work."

In addition to communication challenges among school staff, respondents also noted gaps in administrators' understanding of daily lunch operations. One respondent from a small, suburban district noted that "food production is mysterious to them [administrators]" and "they might not understand the staffing, cost, production time, kids' desires and wants that change depending on the region and school." Respondents emphasized the importance of first-hand experience and knowledge in 7 of the 13 interviews. One respondent from a medium-sized, urban district said that administrators should "come to the cafeteria to see what they [food service and supervisory staff] deal with. Try to manage the kids in the line." Another respondent from a small, suburban district described how "walk-throughs with the students through the lunch line would be beneficial to see what it actually feels like and how long it takes."

Communication gaps were also reported between schools and policymakers. Respondents expressed concerns that policymakers may be disconnected from the realities of school lunch operations, with one respondent from a medium-sized, suburban district observing, "I think some policymakers haven't eaten school lunch in a really long time." Respondents noted that policymakers may not fully grasp what it takes to implement a longer lunch period and emphasized the importance of a hands-on, boots-on-the-ground approach to understand the daily challenges schools face. Respondents further explained that a lack of resources from policymakers reduce administrators' willingness to buy into the 20-minute lunch rule. One respondent from a medium-sized, suburban district stated that some administrators are aware of the benefits for students and "would be supportive if they were given the resources that they need." A frequently mentioned resource was a set of implementation guidelines that could be tailored to the individual needs of different schools. One respondent from a large, urban district

mentioned that districts share “common things, no matter what the size of your district is” but the “way in which you accomplish [the 20-minute lunch rule] is much different.” With schools differing widely in student population size, a respondent from a medium-sized, suburban district noted that many schools that have been able to successfully implement the 20-minute rule have been “smaller schools that might serve like 200 students.”

All respondents identified administrator philosophy as either a facilitator or a barrier to implementation. Many described a lack of understanding of the rationale for the policy as a barrier to implementing the 20-minute lunch rule. They highlighted that administrators do not understand the benefits for students, mentioned in 3 out of 13 interviews, with one respondent from a medium-sized, suburban district stating “people who have a lot of opposition to this are not always thinking about what is best for the children,” and “people [don’t] realize how important it is to sit down, eat, chew your food, enjoy your food, and not rush.” One respondent felt that hurried lunch periods taught students to eat as much and as quickly as possible and that their need to eat can be time-consuming. Many respondents felt that if administrators could understand how the 20-minute lunch rule supports whole-child education, they would be more willing to work it into their master schedules. For example, respondents across districts of different sizes emphasized that a longer lunch period would foster children’s social development, allowing for “socialization and [to get] all their nutrition” and warned that “losing [...] social opportunities may detract from their other assignments if they don’t have the time” to interact with their peers during lunch. Respondents further explained that lunch provides an opportunity for skill-building, such as practicing “proper manners,” learning how to “have one-on-one conversations, how to sit at a table,” and developing the ability to “say please and thank you and [wait] your turn.”

Finally, respondents pointed to confusion about the policy itself as an additional barrier. Administrators were sometimes unclear about what the rule actually required, highlighting the need for further clarification from policymakers. For example, one respondent from a medium-sized, suburban district explained that administrators at their schools believe that “because lunch is scheduled for 20 minutes, we’re meeting that regulation. Kids get out of the classroom, go through the lunch line, get their meal, and then sit down. And then go to recess, that’s 20 minutes. What they don’t realize is that it’s supposed to be 20 minutes of eating.”

Table 2. Barriers and Facilitators to Implementing the 20-Minute Duration Rule

Qualitative Descriptors	Facilitators	Barriers
Funding & Budgeting	<p>“We’ve used United Way of {name} County. They’ve actually been helping, even though we’re in {name} County, we still use them as a resource. It wasn’t necessarily for a 20-minute bell time, but it was, or seat time, but it was for, we did a breakfast after the bell program that they helped us with, but I do know that they would be totally willing to help us if needed.” - Respondent from a large urban school district</p>	<p>“I think that’s our biggest problem right now, is finding those resources, human resources, those capital resources, to make sure that kids are safe.” – Respondent from a large urban school district</p>
	<p>“We did a breakfast after the bell program that [outside funding] helped us with, but I do know that they would be totally willing to help us if needed” – Respondent from a large urban school district</p>	<p>“Equipment and staffing costs make this difficult to implement.” - Respondent from a small, rural school district</p>
Facilities & Equipment	<p>We had “portable equipment and moved it out into the cafeteria. So we would serve like 4th, 5th and 6th the same time we served 1st, 2nd and 3rd. And so we had two lunch lines going.” - Respondent from large, urban school district</p>	<p>“[The multi-purpose room] is a dysfunctional space... balancing gym classes before and after lunch.” – Respondent from a small rural school district</p>
		<p>Well, you have breakfast. Then you’re pulling all that down so you can set up for PE, and then you’re turning around and setting it all up again so you have– can feed them lunch, and you gotta turn around and pull it down again real quick so they can have P.E. again... - Respondent from large urban school district</p>
		<p>“Kids are coming from outside...there are entrances and exits all over the place... they enter in, they flow in, they’re being led usually by a para[professional], and they wrap around into the lunch line.” - Respondent from a large urban school district</p>
		<p>“[With outdated equipment and facilities,] I’m piecemealing it with what we have and equipment that really isn’t designed for that.” - Respondent from a small rural school district</p>
Staff Availability	<p>Many districts have requested the help of “lunchroom playground helpers” and paraprofessionals, who normally facilitate transition times between recess and lunch. - Respondents from a rural and urban school districts</p>	<p>“Teachers do not need to help because of their union contract. Lunch staff are busy with their own tasks rather than able to help with students. There is a shortage of dedicated staff for lunch supervision; other staff are legally allowed to take breaks, etc., and not supervise lunch. Schools are relying on teacher compassion to provide necessary dedicated lunch supervision.” – Respondent from a small suburban school district</p>
		<p>“Additional supports in the cafeteria also play a role, so the longer the lunch time is, you know, the more staff time you’re going to have for those campus safety staff or custodial staff, potentially. They’re operating on limited budgets.” - Respondent from a large urban district</p>
		<p>“It would be super helpful to have 3 food service workers instead of 2...having an additional hand to smooth everything out.” - Respondent, large urban school district</p>

		<p>“The only problem is when lunch is moved up, and staff need to prep lunch, that may impact the time food service staff need to come into work, which has union and legal impacts. Need to consider how lunch food service workers need to prep lunch in the mornings, which may impact what they can serve if lunch periods are moved up/elongated.” – Respondent from a small suburban school district</p>
<p>Scheduling & Time Management</p>	<p>“Staggered lunch times improve flow and allow full eating time.” - Respondent from a large, urban school district</p>	<p>“Adding more time to lunch would impact the amount of time that kids are able to be in the class, and meet those other requirements.” – Respondent from a small suburban school district</p>
	<p>“They've...let kids drift out to recess when they want...if you do have a slower eater, they can almost use the lunchtime and part of recess to eat their food... they at least have the opportunity to sit there and finish their food, or socialize a little bit in the cafeteria.” - Respondent from a small rural school district</p>	<p>“To make that rule of 20 minutes, we have to really consider what the transitions are going to be, and we have to get really, really clear, concise, and tight with our schedule.” -Respondent from a large urban school district</p>
	<p>“They would sit, and the teacher might do something like a read-aloud. So instruction was going to be happening during this time... but they were also going to have a full 20 minutes to eat their meal.” - Respondent from a large urban school district</p>	
<p>Communication & Collaboration</p>	<p>“Listen to teachers, custodians, paraprofessionals, and food service — all voices matter.” – Respondent from a large urban school district</p>	<p>“[Food service directors] don't have any say in [menus]...they are forced to work with what they've come up with.” – Respondent from a small suburban district</p>
	<p>“A work group with scheduling, finance, and nutrition staff helps align constraints.” – Respondent from a large suburban school district</p>	<p>“Some of the people who have a lot of opposition to this are not always thinking about what's best for the student.” - Respondent, small suburban school district</p>
	<p>“Working with other districts to similar sizes...to find out what their ideas may be is important.” - Respondent, large urban school district speaking of a mentorship program</p>	

V. Discussion & Recommendations

Insufficient funding was a prominent identified upstream barrier schools face to successfully implementing the 20-minute lunch duration rule. Additional funding was identified in relation to multiple domains, specifically for expanding food service capacity, hiring more staff to support lunch supervision needs, and upgrading lunchroom facilities and serving equipment. Purchasing additional food service equipment, such as salad bars and point-of-service (POS) operating systems, may expedite lunch service and improve schools' ability to implement the 20-minute lunch duration rule. Furthermore, extra funding may allow schools to hire more food service workers and dedicated lunch supervisory staff to support student management, which relieves other staff, such as teachers and administrative staff, from offering their own lunch breaks to provide support. Many respondents shared their awareness of equipment and staffing constraints and that lack of funding is one of the biggest obstacles preventing them from addressing these constraints. The Capstone Team appreciates that increasing school funding is a challenging undertaking that requires upstream support from local, state, and federal governments.

Any changes made to how lunch time is executed in schools will impact many school staff members. For changes to be successful, respondents shared that input from a variety of stakeholders is needed, as many staff and employees are impacted by how lunch is run, including school nutrition staff, custodial teams, school lunch supervisory staff, teachers, and paraprofessionals. This brings up a major limitation of this report. The vast majority of respondents included in this analysis worked in nutrition and food service; we were unable to interview any principals and were only able to speak with two executive directors. Therefore, the findings and recommendations shared may not adequately reflect the perspectives of school administrators and the constraints they are working within. Future efforts should prioritize engaging administrative and other stakeholders (*e.g.*, teachers, custodial staff, paraprofessionals, etc.) in discussions pertaining to the implementation of this rule and to school lunch at large.

Based on the findings of this report, the following recommendations have been developed for OSPI in support of the creation of a toolkit as schools transition towards implementation of the 20-minute lunch rule:

1) Facilitate open communication and strong collaboration between school districts and schools.

OSPI's toolkit for school districts should emphasize the advantages of cooperation between administrators and food service directors for the successful implementation of the 20-minute lunch duration rule. Schools should be advised to include different school community stakeholders (teachers, food service and nutrition staff, custodial staff, paraprofessionals, administrative staff) in decisions related to lunch service adaptations, as all these stakeholders have a role to play. OSPI could facilitate a Community of Learning that matches schools of

similar sizes and geographic location across the state, to encourage knowledge and resource sharing.

2) Encourage schools to be flexible about their lunch service practices.

OSPI's toolkit for school districts should encourage schools to find creative ways to reduce unstructured and transition time (e.g. waiting in line, traveling from the classroom to the lunchroom). Schools should consider staggering lunch periods to improve the flow of the lunchroom, and allow students to finish their lunch in the classroom if they need more time to eat.

3) Provide clarifications of expectations.

OSPI should ensure stakeholders (e.g. food service directors, paraprofessionals, custodial staff) understand the intention behind and the meaning of the rule (i.e., that the 20 minutes start counting once the last child in the lunch line receives their food). OSPI should encourage administrators to participate in walk-throughs and lunch observations to gather first-hand experience on the lunch period.

4) Encourage schools to pilot the 20-minute rule ahead of the 2029-2030 deadline.

OSPI should create adaptable implementation frameworks to align with the various needs of the schools, based on student population size and staffing availability. OSPI should disseminate implementation frameworks, strategies, and expectations early. This will allow schools the time to practice, adapt, and express concerns with the mandate before it is required. Additionally, to streamline pilot-testing implementation, OSPI should provide support for the pilot-testing period by helping to identify grant opportunities that are available to finance pilot programs, as well as provide technical assistance in applying for these opportunities.

VI. Conclusion

In conclusion, multiple barriers must be overcome for schools to successfully implement the 20-minute lunch rule by the 2029-2030 school year. Funding is a prominent upstream barrier that impacts important considerations like staffing, equipment, and scheduling. Moving forward, efforts that engage diverse stakeholders, connect schools in communities of learning, and support piloting programs are recommended to support the successful implementation of this rule. Importantly, each school has unique needs and access to different resources, underscoring the need for adaptable implementation frameworks. The Capstone Team acknowledges the tremendous work school staff are doing to provide an exemplary education for their students and are deeply grateful for respondents' participation in this project.

VII. References

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