IMPLEMENTATION STRATEGIES FOR NUTRITION SUPPORT TO CHILDREN IN EARLY LEARNING PROGRAMMES

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Executive summary

Early childhood is a foundational phase of life, and the government has committed to ensuring universal access to quality early childhood development (ECD) for all young children in South Africa by 2030. Quality ECD includes access to adequate, safe nutrition.

Yet, currently, there is no national programme in South Africa that ensures meals are provided to children aged 0–5 attending early learning programmes (ELPs). Instead, the government provides an ECD subsidy of just R17 per child per day to eligible children attending registered or conditionally registered ELPs (hereinafter, registered includes conditionally registered), with 40% of that going towards daily nutrition. Further, eligibility to receive the subsidy is contingent on the ELP being registered, which requires meeting onerous regulatory requirements, excluding the majority of poor children in ELPs. Not all children in registered ELPs receive the subsidy and the value of the nutritional component of the subsidy (R6.80) is not sufficient to meet the ideal menu cost of R12.09 (at wholesale prices) when taking into account the full cost of provision. This paper discusses how the government could provide nutrition support to children attending ELPs, irrespective of whether those programmes are registered, leveraging, where possible, the experience, infrastructure, and resources of the Department of Basic Education's (DBE) existing National School Nutrition Programme (NSNP).

The paper explores three implementation models for nutrition support provision to children at ELPs: provincial procurement and provision, direct transfers, and a digital voucher system. After exploring each model in turn, including its potential advantages and disadvantages, the paper compares the three models on a number of metrics, including the complexity of the implementation mechanism, level of choice and diversity in the foods that can be offered, cost-efficiency, opportunity to support local food economies, and risk of fraud. Ultimately, it proposes that the direct transfers and provincial procurement models should be used as part of a dual approach. Registered programmes serving eligible children should receive nutrition support as part of the subsidy (direct transfers). In the case of unregistered programmes in provinces using the centralised NSNP model, the contracted service providers in each province should be leveraged to provide groceries to eligible unregistered ELPs that have the means to prepare food. In provinces using the decentralised NSNP model, provincial education departments could enter into service level agreements with new service providers or

strategic implementing partners to purchase food on behalf of eligible unregistered ELPs with kitchens. This paper does not, however, make provision for programmes without kitchens, and the DBE needs to consider what its approach might be for such programmes in the medium term.

The concluding section of the paper summarises the policy recommendations and presents additional recommendations relating to the roll-out of the DBE's pilot programme for nutrition for young children. As direct transfers are already made to registered ELPs receiving the ECD subsidy, it is recommended that the focus of the pilot should be on testing the two modalities proposed in this paper for reaching unregistered ELPs.

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List of abbreviations

DBE	Department of Basic Education
DoH	Department of Health
DSD	Department of Social Development
GDP	gross domestic product
ECD	early childhood development
ELP	early learning programme
JAM	Joint Aid Management (now ForAfrika)
MRR	monitoring, reporting, and responding (processes or system)
NGO	non-governmental organisation
NIECDP	National Integrated Early Childhood Development Policy
NPO	non-profit organisation
NSNP	National School Nutrition Programme
PED	provincial education department
RR4ECD	Real Reform for Early Childhood Development
SAMRC	South African Medical Research Council
SASSA	South African Social Security Agency
SIP	strategic implementing partner
SLA	service level agreement
Stats SA	Statistics South Africa
TREE	Training and Resources in Early Education
WFP	World Food Programme

Implementation Strategies for Nutrition Support to Children in Early Learning Programmes

Introduction

Access to adequate nutrition is important over the course of our lives, but it is an essential component of early childhood development (ECD). As Müller, Ronaasen, and Besada show, poor nutrition has significant negative consequences for children in South Africa, with one in four South African children affected by stunting.[1] While children attending quintile 1–3 public schools (including Grade R) receive meals under the National School Nutrition Programme (NSNP), there is no public programme to ensure meals are provided to children who are not yet in school but attending early learning programmes (ELPs). The government provides a subsidy of R17 per child per day, of which 40% is intended for nutrition, to ELPs, but as Kazim notes, the proportion of children attending ELPs who benefit from the subsidy is fairly low, with just 33% of programmes reported to be receiving it in the 2021 ECD Census.[2] Based on the available data, only about 15% of children living in the poorest households benefit from the subsidy.[3]

In April 2022, the Department of Basic Education (DBE) took over responsibility from the Department of Social Development (DSD) for ensuring universal access to quality ECD for all young children in South Africa. This migration of responsibility presents an opportunity to explore ways of providing nutrition

[1] Müller, A-M, Ronaasen, J, and Besada, D (2023), "Adequate nutrition: A pillar of early childhood development", *Real Reform for ECD Right to Nutrition Series,* https://www.ecdreform.org.za/#downloads. *See* National Department of Health (DoH), Statistics South Africa (Stats SA), South African Medical Research Council (SAMRC), and ICF (2019), *South Africa Demographic and Health Survey 2016*, Pretoria and Rockville, MD: National DoH, Stats SA, SAMRC, and ICF, https://dhsprogram.com/pubs/pdf/FR337/FR337.pdf

[2] Kazim, T (2023), "Early childhood development and the state's duty to provide basic nutrition to young children in South Africa", *Real Reform for ECD Right to Nutrition Series,* https://www.ecdreform.org.za/#downloads. *See* Department of Basic Education (2022), *ECD Census 2021: Report*, Pretoria: Department of Basic Education, https://datadrive2030.co.za/wp-content/uploads/2022/09/ecdc-2021-report.pdf

[3] Calculations based on data from Children Count, http://www.childrencount.uct.ac.za/index.php and Dulvy, EN, Devercelli, AE, Van Der Berg, S, Gustafsson, M, Pettersson Gelander, G, Kika-Mistry, J, and Beaton-Day, FM (2023), *South Africa Public Expenditure and Institutional Review for Early Childhood Development (ECD PEIR) (English)*, Washington, DC: World Bank Group, 57, https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099192001242341964/p1756791e5e59bde1ad6714d311b6261dd284d0e6d65

support to young children at attendance-based ELPs. Müller, Ronaasen, and Besada highlight the importance of adequate nutrition for early childhood development and learning, as well as for education, health, and productivity outcomes in later life.[4] In addition to improved nutrition, development, and learning, wider provision of meals in ECD programmes can promote demand for and attendance at these programmes. Bearing in mind the 2021 ECD Census finding that enrolment and attendance rates at ELPs are low (see Kazim in the Real Reform for ECD Right to Nutrition Series),[5] this may be an important point worth considering: Improved meal provision at ELPs could help ensure vulnerable young children receive adequate nutrition, while potentially increasing parents' demand for ELPs, and the regularity with which children attend them (especially in food-insecure areas),[6] with consequent benefits for early learning. It can also impact parents' willingness to pay fees, further supporting the viability of ELPs and potentially the quality of their offering, with the latter being in broad alignment with the goal of the 2015 National Integrated Early Childhood Development Policy (NIECDP) to realise universal access to quality ECD services.[7]

This paper forms part of the Real Reform for ECD Right to Nutrition Series. Building on the work of Kazim, from the perspective of law, and Müller, Ronaasen, and Besada, from the vantage point of health, it focuses on the potential modalities of expanding and improving nutrition support for eligible

[4] Müller, Ronaasen, and Besada (2023), "Adequate nutrition".

[5] Department of Basic Education (2022), *ECD Census 2021*, 39–42, 60.

[6] There is limited research on the impact of feeding programmes on enrolment and attendance in pre-primary schools, or early childhood care and education programmes. More studies have been done on school feeding programmes, and there is evidence there to suggest that meal provision can facilitate an increase in enrolment and attendance rates, especially in the context of food insecurity. *See* Drake, L, Woolnough, A, Burbano, C, and Bundy, D (eds.) (2016), *Global School Feeding Sourcebook: Lessons from 14 Countries*, London: Imperial College Press, https://openknowledge.worldbank.org/entities/publication/939dafbb-48a2-5e9c-a467-ab7f67795463; International Initiative for Impact Evaluation (2020), "What is the impact of school feeding programs on students' results?", *Rapid Response Brief*, https://www.3ieimpact.org/evidence-hub/publications/other-briefs/what-impact-school-feeding-programs-students-results; World Food Programme (2017), *How School Meals Contribute to the Sustainable Development Goals: A Collection of Evidence*, https://docs.wfp.org/api/documents/b91da1b2fa2344f6b9f4bad1cfbca40a/download/; Wall, C, Tolar-Peterson, T, Reeder, N, Roberts, M, Reynolds, A, and Rico Mendez, G (2022), "The impact of school meal programs on educational outcomes in African schoolchildren: A systematic review", *International Journal of Environmental Research and Public Health* 19(6), https://doi.org/10.3390/ijerph19063666

[7] *See* South Africa (2015), *National Integrated Early Childhood Development Policy*, Pretoria: Government Printers.

children at ELPs.[8] The paper is divided into four parts. Part A sheds light on the ELP landscape, how ELPs currently finance feeding, and what infrastructure is available that could support an ECD nutrition programme. Bearing in mind the ECD landscape, Part B explores and compares the merits of three implementation models: provincial procurement and delivery; direct transfers; and a digital voucher system. Ultimately, in Part C, the paper proposes a dual and phased approach that takes into account the particular and varied context of the ECD sector, while being mindful of the multiple demands on the fiscus. It then outlines the cost implications of providing adequate nutrition to all eligible children attending ELPs through the proposed dual approach. Part D concludes with recommendations, with several intended for the DBE's planned ECD nutrition pilot.

[8] The discussion is based primarily on desktop research, mainly web sources, but also an evaluation report of the National School Nutrition Programme (NSNP) as well as implementation reports of Ilifa Labantwana's Covid-19 Response Project, with additional modelling having been done to estimate the costs of delivering nutrition support to early learning programmes (ELPs) with access to kitchen facilities.

Part A. Early learning programme landscape

Before exploring possible implementation models for an ECD nutrition programme, it is important to paint a picture of the early learning programme landscape. ELPs differ significantly from schools in several ways, as evidenced by data from the 2021 ECD Census. There are at least 42,420 ELPs across the country, compared to 24,871 schools.[9] While the majority (91%) of schools are public schools,[10] ELPs are almost exclusively run by non-government entities, including non-profit organisations (NPOs), micro-social enterprises, and sole proprietors.[11] In addition to being more numerous, ELPs are considerably smaller, with an average of 39 children per ELP, compared to the average of 539 learners per school.[12] Lastly, it is worth noting that ELPs are located in a wide variety of settings, including densely populated urban and informal settlements, far-flung rural areas, and farms. All of these factors may have implications for implementation models that require the physical delivery of food.

Müller, Ronaasen, and Besada provide a detailed overview of the status of meal/nutrition provision at ELPs, drawing on the 2021 ECD Census and Thrive by Five data.[13] In brief, as they detail in their paper, the majority of ECD sites provide at least one meal a day to children, though few provide all the recommended meals and food quality varies. Many ELPs also rely on parents to provide some meals.[14] Further, the Thrive by Five data shows a large proportion of sites providing food that does not adhere

[9] Department of Basic Education (2022), *School Realities 2022,* https://www.education.gov.za/Portals/0/EMIS/School%20Realities%20December%202022.pdf?ver=2022-12-12-112304-000

[10] Department of Basic Education (2022), *School Realities 2022*.

[11] Bridge, Ilifa Labantwana, National ECD Alliance, Nelson Mandela Foundation, SmartStart, and South African Congress for ECD (2020), "The plight of the ECD Workforce", https://www.bridge.org.za/wp-content/uploads/2020/04/Final-report-The-plight-of-the-ECD-workforce-1.pdf

[12] Department of Basic Education (2022), *School Realities 2022*.

[13] Müller, Ronaasen, and Besada (2023), "Adequate nutrition". *See* Department of Basic Education (2022), *ECD Census 2021*. *See also* Giese, S, Dawes, A, Tredoux, C, Mattes, F, Bridgman, G, Van Der Berg, S, Schenk, J, and Kotzé, J (2022), *Thrive by Five Index Report Revised August 2022*, Innovation Edge: Cape Town, https://thrivebyfive.co.za/wp-content/uploads/2023/05/Index-report-w-addendum_singles-May-2023.pdf

[14] Department of Basic Education (2022), *ECD Census 2021*, 7.

to the menu guidance provided, as well as a lack of guidance for parents on what optimal foods should be given to children.[15]

Moreover, the 2021 ECD Census and Thrive by Five data indicate a significant relationship between the primary funding source of ECD programmes and meal provision. Based on calculations using the ECD Census data,[16] sites were 78% more likely to provide breakfast, 195% more likely to provide lunch, and 41% more likely to provide snacks—if subsidies were identified as the primary funding source when compared with sites whose main source of income was fees. ECD subsidies may thus be a critical mechanism for ensuring food provision at ELPs; this is particularly important for children from poor households, which are more likely to be food insecure. This suggests that the extension of nutrition support to ELPs that currently do not receive the ECD subsidy would sharply increase children's access to meals at those ELPs.

The next section adds more detail to this ECD landscape, focusing on the existing infrastructure (mainly meal preparation and storage facilities) for nutrition support provision at ELPs and their access to banking and funding. The discussion in the section is primarily based on data, as well as calculations based on the data, from the 2021 ECD Census[17] and Thrive by Five.[18]

Meal preparation facilities

Analysis of the Thrive by Five dataset[19] suggests that the great majority (85%) of ECD programmes have an area for cooking and preparing meals that is separate from where the children engage in daily

[15] Department of Basic Education (2022), *Baseline Assessment: Technical Report*, 32–33, https://thrivebyfive.co.za/wp-content/uploads/2022/11/Baseline-Assessment-Report.-2022-1.pdf

[16] Department of Basic Education (2022), *ECD Census 2021*.

[17] Department of Basic Education (2022), *ECD Census 2021*.

[18] Data available from DataFirst, University of Cape Town, https://datadrive2030.co.za/resources/the-thrive-by-five-index/

[19] Results of analysis of the Thrive by Five data should be interpreted cautiously. The Thrive by Five survey data was randomly sampled using a sampling frame based around school quintiles, which are an imperfect measure of poverty. Furthermore, only known ELPs could be sampled in the survey. Therefore, unknown ELPs, which house the most vulnerable children, may have been excluded from the sample. Finally, missing data values have been excluded from proportional analysis, and missing values may be non-randomly distributed.

activities.[20] A further 7% do not have a *separate* space for meal preparation, and the remaining 7% do not have any designated food preparation area or do not provide meals. Approximately equal proportions of facilities (41%) use gas or electricity for cooking, whilst approximately 7.5% reported using coal or wood. About 10% of sites reported lacking any source of power and energy for cooking, which is slightly higher than the proportion of facilities that reported a lack of dedicated kitchen space for meal preparation, indicating that some food preparation takes place at sites without a designated kitchen area, although this is relatively infrequent. Further, 84% of sites indicated they had access to refrigeration facilities on-site.

Based on calculations using the 2021 ECD Census data,[21] sites were 14 times more likely to provide breakfast, 6 times more likely to provide lunch, and nearly 3 times more likely to provide snacks in between meals—if they reported having access to a kitchen or meal preparation area. This highlights the significance of a kitchen or meal preparation area in the provision of meals to children, as well as the ability of the majority of ECD programmes to prepare meals for children. Sites reporting access to a kitchen were less likely to receive food support directly from parents and more likely to receive food directly from ECD programme funding or government support. Conversely, sites were more likely to indicate that food support came from parents when they lacked a kitchen or meal preparation area, relative to sites that had kitchen facilities.

The Thrive by Five dataset suggests nearly all facilities have access to water, with just over half of the facilities (55%) reporting having access to tap water in the building, 18.5% reporting having access to a tap somewhere on-site or outside of the building, 11% reporting using rainwater, and 7% reporting using a public or communal tap off-site. Less than 1% of facilities reported having no access to water at all, less than 1% identified rivers as their source of water, and another 3% reported other sources of fresh water as their supply. All sites were more likely to indicate availability of a designated cooking area if they had on-site access to water (including tap water in the building or on-site, or bore-hole or

[20] *See also* Department of Basic Education (2022), *Baseline Assessment*, 33, table 26.

[21] Department of Basic Education (2022), ECD *Census 2021.*

rainwater tank on-site). This reflects the ability of the majority of sites to prepare food on-site and comply with food and safety standards.

Access to bank accounts

Access to bank accounts would be required for ECD programmes to receive direct transfers. In the 2021 ECD Census, 75% of ECD programmes reported having a bank account in the programme's name.[22] This percentage was higher, at 94.6%, in the Thrive by Five survey, in which 3.7% indicated using their principal's account, while the rest did not use a bank account; though as the baseline assessment report notes, this may have to do with the high proportion of formalised ELPs included in the sample.[23] Analysis of the Thrive by Five dataset also indicates that 76.9% of sites use cash for managing ECD services and 30.3% use mobile banking (e.g. MTN, MoMo, or e-wallets through banks), with 6% using retail banking (e.g. money transfers via Pick 'n' Pay, Shoprite, or PEP stores). In other words, a majority of ELPs have access to bank accounts that would allow them to receive funding directly from the government, and they employ a range of procurement modalities that could also be explored in the development of any ECD nutrition programme.

Altogether, what can be concluded from this 2021 ECD Census and Thrive by Five data is that (1) the ECD subsidy is a crucial measure for ensuring nutrition provision at ELPs; (2) most have sufficient infrastructure to be able to prepare meals on-site (though capacities may vary); and (3) most have access to bank accounts in order to be able to receive funds transfers. This, in turn, suggests that it is possible for the Department of Basic Education to roll out an ECD nutrition programme that includes, inter alia, direct transfers and/or the procurement and delivery of groceries for on-site meal preparation as modalities. Where the challenge may lie is in a lack of data about adequate and/or secure storage facilities at ELPs (the Thrive by Five data does not include this information). In respect of procurement and delivery as a modality, the lack or inadequacy of such facilities may necessitate, for instance, smaller and more frequent deliveries of food, with attendant implications for cost. While

[22] Department of Basic Education (2022), *ECD Census 2021*, 44.

[23] Department of Basic Education (2022), *Baseline Assessment*, 29–30.

the DBE may have a longer-term vision of formalising the sector, any ECD nutrition programme will need to operate within the current realities of informality for some time.

Non-governmental sector support for ELPs

The non-governmental sector has been at the forefront of supporting early learning programmes in South Africa, and unregistered ELPs in particular. The potential role of non-governmental organisations (NGOs) and/or private sector actors already working in the ECD sector in helping fill a service-provider role for ELPs is large, and already being implemented in parts of the country. Especially given the diverse and complex landscape of ELPs described in the previous section, NGOs could therefore be important strategic implementing partners (SIPs) in supporting a national nutrition support programme in the sector. Likewise, there are corporate foundations that could play a major role, such as the Tiger Brands Foundation, for example, is already doing for the National School Nutrition Programme. (See Müller, Ronaasen, and Besada in this research series, for more on existing private feeding schemes, including Tiger Brands' scheme, in the ECD sector.)

Through partnerships between the government and the non-governmental sector, it is more feasible to imagine the government providing support that reaches the large numbers of ELPs across the country, maintaining up-to-date information, and providing sound monitoring and support. Those already supporting large networks of ELPs are particularly well placed to participate in a national ECD nutrition support programme that can reach the unregistered and most isolated ELPs. Working with ECD-focused non-governmental actors in the delivery of goods and services to ELPs would allow the government to amplify its reach and consolidate the flow of information through trusted partners.

Such SIPs could play various roles in this regard, and indeed in any of the models explored later in this paper. They could, for example,

- identify and verify beneficiaries that meet required eligibility criteria;
- collect and maintain data to support planning and implementation;
- provide training and support to ELPs to follow guidelines or good practices;
- receive goods and/or funds on behalf of eligible ELPs;
- procure goods on behalf of ELPs;
- deliver goods to ELPs;

- facilitate a flow of information and trust between ELPs and the government;
- monitor compliance and the impact of support; and/or
- report to the government or support/coordinate reporting by ELPs.

It is important to note that these roles require capacity and resources, and it is likely that in the case of partnerships with SIPs, reasonable funds would need to be provided to them to carry out these roles. Also, not all unregistered ELPs are connected to existing NGO networks. Therefore, this approach would need to form part of a larger plan to partner with civil society and private sector actors, expanding their existing reach, and, where necessary, stimulating the emergence of new partnerships that could provide support where there is no coverage. This model is in line with the DBE's vision for the service delivery model in the ECD sector, which highlights the important future role of partnering with NGOs, including through the commissioning of services to ensure children have access to ECD programmes.[24]

Further, ECD forums and parents, too, are important partners in supporting ELPs to provide nutrition and to monitor its implementation. Any ECD nutrition support programme should include these stakeholders as well, in all phases of planning and implementation.

[24] A presentation of the Department of Basic Education's (DBE) envisaged service delivery model for the ECD sector was made to the ECD Inter-sectoral Forum on 30 August 2023.

Part B. Implementation models

Bearing in mind the sectoral landscape just detailed in Part A, this second part of the paper explores various implementation modalities for an ECD nutrition programme. Specifically, it considers the strengths and weaknesses of three potential models: provincial procurement and provision, direct transfers, and a digital voucher system.

Provincial procurement and provision

This section looks at the first potential model: provincial procurement and provision. It begins by describing and exploring the National School Nutrition Programme, as a relevant example of a nutrition support programme that uses provincial procurement and provision. Using the NSNP as a case study, the merits of centralisation are interrogated. It then goes on to discuss how a provincial procurement and provision model could be applied to the case of nutrition support in the ECD sector.

Case study: National School Nutrition Programme

The National School Nutrition Programme is grounded in sections 28 and 29 of the South African Constitution.[25] Section 28(1)(c) I states that every child has the right "to basic nutrition, shelter, basic health care services and social services", and section 28(2) emphasises the paramount importance of a child's best interests in every matter concerning the child. The NSNP, as a programme "concerning the child", clearly gives effect to this basic right. Meanwhile, section 29(1)(a) states that everyone has the right "to a basic education". This includes elements such as infrastructure, transport, and nutrition, which are necessary to make education meaningful and effective. It goes without saying that education enables learners, particularly from disadvantaged backgrounds, to gain access to opportunities and break the chains of poverty; and facilitates the achievement of equality. The provision of nutrition through the NSNP is therefore a critical component of the right to receive basic education under section 29. Kazim similarly grounds the case for an ECD nutrition programme in sections 28 and 29 of

[25] Other pertinent sections include section 10 on human dignity and section 27 on healthcare, food, water, and social security.

the Constitution, strengthening the case for expanding nutrition support to ensure all eligible children—whether in schools or in early learning programmes—get adequate nutrition.[26]

The NSNP was initially introduced, in 1994, as the Primary School Nutrition Programme, with the intention of providing meals to primary school learners. Soon thereafter the programme was expanded to its current form, which provides meals to all learners in quintile 1–3 primary and secondary schools—in some provinces also select quintile 4 and 5 schools—and identified special needs schools. The Department of Basic Education has consistently emphasised the impact and necessity of the NSNP, stating that "the relevance of the NSNP is unquestionable; given the high levels of child poverty and hunger in South Africa".[27] In the DBE's strategic plan for 2020–2024, the NSNP is identified as a major spending area that was protected from budget cuts in real terms due to it being a key lever for achieving the aims of the National Development Plan.[28]

The strategic goal of the NSNP is to "enhance learning capacity and improve access to education",[29] and towards that strategic end, its objectives are to "[p]rovide daily nutritious meals to enhance learning capacity; promote healthy lifestyles through nutrition education; and support the development of food gardens in schools".[30] The programme is implemented in terms of the NSNP conditional grant framework, which stipulates the conditions to which provincial education departments (PEDs) must adhere, including in terms of which schools qualify for the NSNP and the average expenditure per learner (currently R3.50 per learner per day for primary schools and R4.25 for secondary schools).

[26] Kazim (2023), "Early childhood development".

[27] JET Education Services (2016), "Report on the implementation evaluation of the National School Nutrition Programme", Department of Planning, Monitoring, and Evaluation and Department of Basic Education, 174, https://evaluations.dpme.gov.za/evaluations/528/documents/0b6b849a-a849-46ee-9252-83a4e3bf980e

[28] Department of Basic Education (2020), Department of Basic Education Strategic Plan 2020–2024, 16.

[29] National Treasury (2022), Division of Revenue Bill B6—2022, 144, https://www.treasury.gov.za/legislation/bills/2022/[B6%20-%202022]%20(DoRB).pdf

[30] Department of Basic Education (2015), *NSNP Annual Report 2013/2014*, 10, https://www.education.gov.za/Programmes/NationalSchoolNutritionProgramme.aspx

How the NSNP is funded

The NSNP is funded by a purpose-specific conditional grant that is transferred to the provinces in terms of the annual Division of Revenue Acts (see Kazim in this research series). Though managed by the Department of Basic Education, the responsibility for the overall performance of the grant is shared by the DBE and PEDs. The NSNP conditional grant framework sets out the various responsibilities of the national and provincial education departments. The DBE must transfer the funds to the provinces; manage, monitor, and support the implementation of the NSNP; and ensure compliance with the NSNP guidelines. Meanwhile, PEDs are responsible for spending the actual funds, and they must manage and implement the programme.

The NSNP has not been incorporated in the equitable share,[31] which ensures the ring-fencing of the funds to, in turn, ensure the uncompromised implementation of all NSNP activities in schools. The NSNP conditional grant and thus the NSNP itself are currently envisaged to continue until at least 2033.[32] Under the grant conditions, national and provincial business plans must be drawn up, and all spending must be in line with these plans. Provinces may follow one of two models for spending NSNP funds and contracting with NSNP suppliers: Some provinces transfer funds directly to all schools, who in turn contract with service providers, while other provinces procure service providers directly.

Approximately R9.3 billion was allocated to the NSNP in 2023/2024.[33] The NSNP conditional grant framework is comprehensive in terms of detailing the conditions for these budget allocations. Weightings for spending direct that a minimum of 97% of the grant be spent on school feeding; a minimum of 0.3% and a maximum of R10 million on kitchen facilities, equipment, and utensils; and a maximum of 0.2% on nutrition education. The conditions further detail minimum feeding

[31] Provincial equitable share is a direct charge on the National Revenue Fund that is administered directly by provincial departments. This is in contrast to conditional grants, which are administered by national departments and are used to support compliance with national norms and standards and to ensure that national priorities are adequately provided for.

[32] National Treasury (2023), Division of Revenue Bill B2—2023, 152, https://www.treasury.gov.za/legislation/bills/2023/[B2-2023]%20(Division%20of%20Revenue).pdf

[33] Division of Revenue Act 5 of 2022 in GN 1086 *GG* 46549 of 15 June 2022, https://www.parliament.gov.za/storage/app/media/Acts/2022/Act_5_of_2022_Division_of_Revenue_Act.pdf; Division of Revenue Act 5 of 2023 in GN 3295 *GG* 48792 of 15 June 2023, https://www.parliament.gov.za/storage/app/media/Acts/2023/Act_No_5_of_2023_Division_of_Revenue_Act.pdf

requirements, the payment of instalments, and the consequences of non-compliance with the grant conditions.[34]

How the NSNP is implemented

The Department of Basic Education's approach to the implementation of the National School Nutrition Programme has been to give the provinces some leeway to decide the most effective and efficient way to implement the NSNP. There are in essence two models.

- In the centralised model, provincial education departments are responsible for ensuring procurement: PEDs are responsible for appointing and contracting with service providers to procure and deliver food to schools, in addition to transferring funds to schools for the payment of volunteer food handler stipends and the procurement of fuel. This model is implemented across Gauteng, KwaZulu-Natal, Limpopo, Mpumalanga, and the Western Cape.
- In the decentralised model, PEDs transfer money directly to schools, which are then responsible for entering into service level agreements (SLAs) with service providers directly. This model is implemented in the Eastern Cape, Free State, North West, and Northern Cape.

The discussion that now follows compares the centralised and decentralised models from both theoretical and empirical perspectives, with a view to drawing out lessons for an ECD nutrition support programme.

Comparing the centralised and decentralised NSNP procurement models

Centralised provincial procurement centralises decision-making within PEDs, which has various pros and cons. (On centralised national procurement, see Box 1.) Generally speaking, centralisation advocates argue that it is a system that significantly reduces operational costs and is ultimately better value for money. In other words, centralisation produces economies of scale: i.e. cost advantages experienced as a result of efficiency. The government benefits "from potential economies of scale by means of volume purchasing or bulk purchasing, enabling the supplier to provide goods and services

[34] National Treasury (2023), Division of Revenue Bill B2—2023, 151–153.

at a lower cost".[35] However, an analysis of provinces' meal costs suggests that these economies of scale are not necessarily present in the centralised model of the NSNP (see the discussion on cost-efficiency later in this section).[36] It follows that centralisation is also unlikely to achieve economies of scale in the ECD sector. In particular, ELPs are significantly smaller and more numerous than schools, as noted in Part A earlier.

Centralisation also has some inherent downsides. It can have a negative effect on the external market by centralising the pool of potential suppliers.[37] Furthermore, the fairness and equitableness of a centralised system is sometimes questioned by small to medium-sized organisations, which may struggle to compete to become suppliers.[38] A centralised system may promote short-term savings, but it can also create longer-term risks and may not sustain competitive pricing.[39] In the ECD sector, centralisation may further result in ELPs having less flexibility in terms of menu and cultural preferences while having higher rates of wastage, and having less ability to hold service providers accountable. Moreover, it pools risk by creating a single point of failure, unlike decentralised procurement.

While a centralised system clearly focuses on efficient procurement, advocates for decentralisation argue that it serves as effective procurement with a focus on fulfilling the needs of the end user.[40] The procurement of goods with a focus on the end user "results in refined SLAs that reflect these needs through specific outputs and outcomes to be achieved by the supplier. Refined SLAs reduce the scope for mistakes usually encountered by bulk purchasing".[41]

[35] Brooks, M (2016), "The legality of centralised public procurement in South Africa", *African Public Procurement Law Journal* 3(1), 44.

[36] *See also* JET Education Services (2016), "Report on the implementation evaluation", 156–159.

[37] Brooks (2016), "The legality of centralised public procurement", 50.

[38] Brooks (2016), "The legality of centralised public procurement", 57.

[39] Brooks (2016), "The legality of centralised public procurement", 50, 51.

[40] Brooks (2016), "The legality of centralised public procurement", 46.

[41] Brooks (2016), "The legality of centralised public procurement", 46.

Box 1. Nationally centralised procurement and provision

In terms of section 93 of the Children's Act (38 of 2005), the responsibility for funding and supporting early childhood development (ECD) programmes is a provincial function. As Kazim argues, in her paper in this Real Reform for ECD Right to Nutrition Series, this could be interpreted to include the provision and funding of nutrition for children in ECD programmes. A proposal to nationally centralise procurement and provision of nutrition support to early learning programmes is therefore not in keeping with the legislative provisions of the Children's Act. This paper thus does not explore the option explicitly. However, many of the potential advantages and disadvantages of a provincially centralised procurement and provision model, described in the paper, would likely apply to a nationally centralised model too, and possibly at greater extremes.

Beyond theory, what does the experience of the NSNP show?

Administrative efficiency

The 2016 Implementation Evaluation of the National School Nutrition Programme found that provinces using the decentralised model were implementing business processes more efficiently, though the administrative burden on schools was higher.[42] This is important to bear in mind when considering the potential challenges of using a decentralised model for unregistered ELPs, many of which currently operate informally and are under-capacitated.

Delays in delivery

The implementation evaluation report further cited the late delivery of food as the main reason for schools not always following the proposed menu and for them being unable to serve meals on some school days.[43] The delays arose from late disbursements, but also other factors such as lack of delivery schedules and limited monitoring.[44] Late delivery seems to have been more of a concern in centralised provinces, suggesting that schools are better able to hold service providers accountable when they pay

[42] JET Education Services (2016), "Report on the implementation evaluation", IV–V.

[43] JET Education Services (2016), "Report on the implementation evaluation", 19.

[44] JET Education Services (2016), "Report on the implementation evaluation", 149, 114–124.

them directly.[45] A downside of centralisation therefore appears to be a lesser ability to hold service providers accountable, resulting in more delivery delays. In terms of the preparation and serving of meals, according to the implementation evaluation report, in the provinces using the decentralised model, 26.5% of schools noted that there were days when feeding had not taken place, in comparison to 48.2% of schools in the provinces using the centralised model.[46]

Agency and choice

While the centralised NSNP model may be easier for the DBE to control, the decentralised model gives schools more flexibility over food choices and, with limited support, can serve to build their capacity.[47] In contrast, a centralised model is arguably paternalistic. This means that in isolation of other support, it would not develop the capabilities of ELPs to procure food themselves.

Storage facilities

Infrastructure challenges—including inadequate space for food storage and preparation, limited access to water, poor cleanliness, and unsafe storage of gas—exist across a large proportion of schools, hampering the schools' ability to undertake safe and efficient preparation of meals.[48] Of additional concern is the lack of security in food storage areas, with 22.6% of schools noting a lack of lockable storage areas in the 2016 NSNP implementation evaluation.[49] While there is insufficient data available on storage facilities and security at ELPs, it is likely that this situation will be even more concerning at ELPs. Deliveries would therefore need to be small and frequent enough to meet these constraints.

[45] JET Education Services (2016), "Report on the implementation evaluation", 19.

[46] JET Education Services (2016), "Report on the implementation evaluation", 82.

[47] Hartnack, H (2022), "Options for delivering nutrition to young children in ECD programmes in South Africa: Lessons from South African and international case studies", Ilifa Labantwana, 35.

[48] JET Education Services (2016), "Report on the implementation evaluation", 83–88.

[49] JET Education Services (2016), "Report on the implementation evaluation", 85.

Monitoring and support

Monitoring of deliveries was noted as a key area for improvement in both models in the implementation evaluation.[50] It seems that decentralised contracting enables schools to hold service providers more accountable, as mentioned earlier, given that in provinces using the centralised model, service providers are accountable to PEDs rather than schools directly.

Cost-efficiency

Using provincial key performance indicator data for January–March 2022, obtained from the DBE, it has been possible to compare the reported meal cost per child per day for provinces implementing the centralised and decentralised NSNP models. For primary school meals, provinces using the centralised model incurred an average meal cost per child per day (excluding honorarium and gas) of R3.14, compared to R2.78 in provinces using the decentralised model—i.e. the average meal was 13% more expensive in centralised provinces. For secondary school meals, the average meal cost per child per day (excluding honorarium and gas) was R3.64 in provinces using the centralised model, compared to R3.40 in provinces using the decentralised model—i.e. it was 7% higher in centralised provinces. This indicates that provinces using the decentralised model achieve lower unit costs than those using the centralised model.

To explore the impact of the degree of centralisation on costs more deeply, the charts in Figure 1 present these average costs against the number of service providers used in each province for primary and secondary school meals respectively. There is no clear relationship between meal costs and the number of service providers, either within the two NSNP models or across them. This suggests that consolidating contracts among a smaller number of service providers does not yield the ability to achieve lower costs.

[50] JET Education Services (2016), "Report on the implementation evaluation", 169.

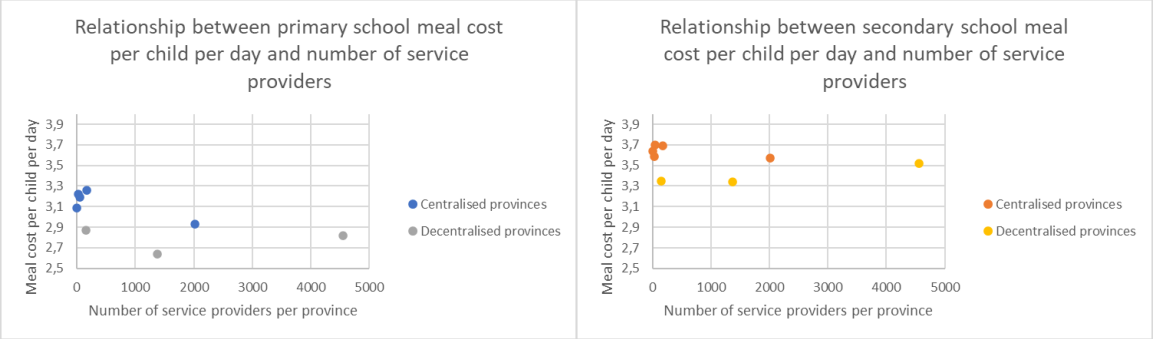


Figure 1. Relationship between meal cost and number of service providers

How the model could be implemented in the ECD sector

Centralised provincial procurement model

In terms of section 93 of the Children's Act (38 of 2005), the responsibility for funding and supporting ECD programmes is a provincial function. As Kazim argues, in her paper in this research series, this could be interpreted to include the provision and funding of nutrition for children in ECD programmes. Provincial education departments would therefore be empowered to contract with service providers to procure and provide food to early learning programmes on their behalf, with the ELPs then preparing the food to serve meals to the children in their care. The model would, in general, be better suited for ELPs with fewer resources and capacity. Implementation in this manner would be comparable to the centralised NSNP model, and it could be funded through a conditional grant. An ECD nutrition programme using this model would further need to be implemented in line with procurement and other applicable legislation.

In provinces implementing the centralised NSNP model, there would be a choice of either leveraging existing NSNP service providers to deliver food to ELPs as well or entering into contracts with new service providers to deliver food to ELPs only. In the latter case, a further choice would exist: between using commercial service providers (as in the case of the NSNP) or entering into contracts with strategic implementing partners in the non-governmental sector (in line with the potential of leveraging such SIPs in the ECD sector discussed earlier in Part A).

Decentralised provincial procurement model

In the decentralised NSNP model, the payments made by schools to service providers are classified as "goods and services" in terms of their economic classification.[51] In line with this, and as state entities, schools are required to adhere to the government's procurement provisions in the selection and appointment of service providers to deliver food to them.[52] But ELPs are not public entities. So, in the case of ELPs, transfers would be provided to them using the same economic classification as that used for the ECD subsidy, namely "transfers and subsidies".[53] This classification would not trigger government procurement requirements, such as obtaining three quotes for all purchases.[54] Instead, transfers classified as "transfers and subsidies" would be governed by requirements articulated in a service level agreement between the PED and the ELP, allowing for flexible reporting requirements in accordance with the provisions of the Public Finance Management Act (1 of 1999).

This approach would therefore be more closely comparable to the direct transfers model that is discussed next. As noted in that discussion, direct transfers would be much more appropriate in the ECD sector, where transfers would be small due to smaller child numbers. However, they might not be suitable for unregistered ELPs, which would typically lack the capacity to procure food and adequately account for the appropriate use of funds.

Direct transfers

The second model is the direct transfer of funds to early learning programmes for the purchase and preparation of nutritious food for children at the ELPs. (See Box 2 for the example of Kenya, which uses a direct transfers model to feed children in schools and ELPs.) Direct transfers are already used to

[51] Department of Basic Education (n.d.), *National School Nutrition Programme Financial Management Guideline for Schools*, Department of Basic Education, 12.

[52] Department of Basic Education (2022), *National School Nutrition Programme Quarter 2 Report*, Department of Basic Education, 11.

[53]National Treasury (2018), Classification circular—Classification of transfers and subsidies versus goods and services, 4, https://oag.treasury.gov.za/Publications/13.%20SCOA/03.%20Circulars/Classification%20circular%2021%20-%20Transfers%20and%20Subsidies%20vs%20Goods%20and%20Services%20or%20Capital%20Assets_28%20May%202018.pdf

[54] National Treasury (2018), Classification circular—Classification of transfers and subsidies versus goods and services, 4.

provide at least 627,000 children in registered and subsidised ELPs with nutrition as part of the ECD subsidy.[55] In contrast with centralised procurement and provision, and as noted in the previous section, this model would be better suited to ELPs with high capacity for managing the administrative requirements of procurement and reporting.

Box 2. Kenya's Home Grown School Meals Programme[56]

In the 1980s, the Kenyan Ministry of Education and the World Food Programme initiated a successful school meals programme targeting all primary schools in arid and semi-arid areas, as well as in informal settlements. The programme also targeted pre-primary schools or early learning programmes (ELPs). In 2009, the Kenyan government committed to taking over responsibility for this programme and starting the first Home Grown School Meals Programme in Africa, initially serving 540,000 children. The takeover was gradual, but by 2017, a national school feeding strategy had been adopted, and by 2018, the government was in control of the programme, supporting 1.6 million children and tripling its budget to $24 million.

Under the programme, funds are transferred directly to participating schools in marginal agricultural districts with access to markets, for the local purchase of cereals, pulses, and oils, on a biannual basis. Meals are then cooked for the children at the schools. The schools procure the foodstuffs, through a competitive process, from registered/licensed local farmers or suppliers on a termly basis, depending on the storage capacity at the school. The Ministry of Finance guides procurement procedures through circulars. (See also Kazim on the laws and policies regulating the delivery of the programme.) Improving the income of smallholder farmers through structuring market demand from the programme is one of the objectives of the school-feeding programme.

The ECD sector was specifically included in Kenya because demand for ECD programmes is low in many parts of the country, with the idea being that the provision of food would increase participation in programmes. An evaluation of the feeding programme identified that it improved both enrolment and participation in ECD programmes.[57]

[55] Dulvy et al. (2023), *South Africa Public Expenditure and Institutional Review*, ix.

[56] *See* World Food Programme (2020), "A chance for every schoolchild: Partnering to scale up school health and nutrition for human capital: WFP school feeding strategy 2020–2030", https://www.wfp.org/publications/chance-every-schoolchild-wfp-school-feeding-strategy-2020-2030; Elmi, TD and Elmi, MD (2018), "Assessment of feeding program in ECD enrolment in Eldas Sub-County, Wair County, Kenya", *International Journal of Research and Innovation in Social Science* II(VII).

[57] Karaba, MW, Gitumu, M, and Mwaruvie, J (2019), "Effect of school feeding programme on ECDE pupils' class participation in Kenya", *Pedagogical Research* 4(1), em0029, https://doi.org/10.29333/pr/5744

How it could be implemented

Direct transfers should flow to registered programmes serving eligible children as per the current ECD subsidy system. In this system, PEDs enter into service level agreements with ELPs and then make monthly or quarterly transfers directly to them. ELPs then use a portion of these funds to purchase food, which they prepare and serve to children attending the programmes. ELPs are required to report to PEDs on the use of these funds and are also subject to regular monitoring.

To use this model to support unregistered ELPs, PEDs could engage the services of strategic implementing partners to identify and verify the eligibility of individual ELPs and to centralise database management, monitoring, and reporting on ELPs behalf, or in partnership with PEDs and district officials. Transfers could either be made to SIPs in bulk and then onward to unregistered ELPs from them or be made directly to ELPs, but on the instruction of SIPs, by PEDs. In the case of some ELPs and in areas with low coverage of potential SIPs, it may be necessary that district offices play this role. Because of the small size and large number of ELPs, which needs to grow further to reach the goal of universal access to ECD programmes, this may in fact be an approach that should eventually be considered for subsidy payment and reporting in general, and not just for unregistered ELPs.

In this approach, eligible ELPs would sign agreements with SIPs, stating that they will use the funds for the provision of nutritious meals to children enrolled in the programme and outlining their responsibilities as well as those of the government. ELPs' banking details would need to be validated, ensuring they are connected with the relevant ELP. Transfers could be made monthly or quarterly from the PED, either directly into the SIP's bank account (and then on to ELPs) or directly into the ELP's bank account (on the basis of information and assurance provided by the SIP), in amounts appropriate for the number of children enrolled in the programme. Periodic monitoring would be conducted to ensure that nutritious food is being provided to enrolled children and the terms of the agreement are being adhered to.

Implementation advantages and challenges

This approach can make use of existing payment and monitoring systems in the ECD sector, though it would certainly require additional capacity to implement at scale. The full allocation per child would

be transferred into the ELP's bank account, without additional costs for procurement, storage, transport, etc. on the part of the state. It is worth noting that these costs would be borne by the ELP in this model. However, it is likely that many ELPs are already incurring costs such as for travel to shops, preparation of food, cooking fuel, etc.

Transferring funds to ELPs allows them the choice of what foods to provide. This has several benefits. ELPs can provide foods that are locally available and culturally relevant, increasing the likelihood of buy-in from caregivers and children. It also means they can purchase fresh foods and purchase foods as and when they are needed, reducing pressure on potentially limited storage space and the associated risk of theft of stored goods from ELP premises. Since the nutrition support would target programmes serving poor children, the funds would, in turn, also support local food providers, stimulating local economies, in poor areas.

The inability of ELPs to procure food in bulk can reduce the purchasing power of funds provided for meals in this direct transfers model, especially if ELPs are not conservative with their expenditures. However, if ELPs receive in-kind donations of food products, have discount agreements with retailers, or produce their own fresh produce, the provision of transferred funds allows them to make purchases that are relevant to their outstanding needs.

This model might produce concern about ELPs' ability to make sound food purchase choices. To ensure that funds are used to provide nutritious foods, ELPs would need to be provided with training and guidance on good nutrition and healthy meal preparation for young children (see also Müller, Ronaasen, and Besada). The risk that guidance might not be followed would be further mitigated by sound monitoring and reporting requirements—the NSNP monitoring and reporting system can be leveraged here.

Digital voucher system

The third potential model involves the use of digital vouchers. What would it look like if the DBE were to adopt a digital voucher system to support nutrition in early learning programmes at scale? This section considers the question based on lessons learnt from the recent Ilifa Labantwana Covid-19

Response Project,[58] which is the only scaled voucher distribution programme to support nutrition at ELPs that has been piloted in South Africa. Learnings from this programme thus have implications for voucher distribution within the ECD sector. (See Box 3 and Box 4 for examples of other voucher programmes implemented at scale.)

Box 3. Department of Social Development/SASSA voucher programme

The Department of Social Development (DSD), through the South African Social Security Agency (SASSA), provides food vouchers for social relief of distress. The DSD gives vouchers in order to empower people to make their own choices and decisions and to reduce the logistical issues around food parcels such as procurement, storage, distribution, and security. According to Williams and Selvaggio,[59] these vouchers are given either in actual monetary form, as "gift cards" for supermarkets, or as debit cards loaded with a total of R3,400 for three months' worth of food. The card is given with an ID and PIN, and in order to limit abuse of the vouchers, the DSD has a list of accessible grocery stores where the food vouchers can be used and has developed a guide on nutritious and sustaining foods for purchase.

Box 4. ForAfrika (formerly Joint Aid Management or JAM) voucher distribution

ForAfrika piloted a system in which vouchers were redeemed at spaza shops, similar to the Ilifa Labantwana Covid-19 Response Project. The ForAfrika voucher was for a pre-packed Pick 'n' Pay hamper worth R400, with local spaza shop owners only playing a distribution role. The voucher targeted households with children, and not early childhood development programmes, since the project was launched when these programmes were closed during the Covid-19 lockdown. The identified beneficiaries would receive an SMS with a voucher number, which they could then go and redeem at a local spaza shop, with each spaza owner provided with a smartphone app to scan the digital voucher and allow its redemption via ForAfrika's digital information platform.

[58] Ilifa Labantwana (2021), "ECD COVID Response Project: Final narrative report", Ilifa Labantwana, https://ilifalabantwana.co.za/wp-content/uploads/2021/11/COVID-response-Final-Report_for-website.pdf

[59] Manzini, B, Salvaggio, MP, and Berhane, E (2013), "Eastern Cape study: Diagnostic/implementation evaluation of nutrition interventions for children from conception to age 5", Department of Performance Monitoring and Evaluation, https://evaluations.dpme.gov.za/evaluations/441/documents/2451d670-746c-4cdc-bfe6-154836cb27cb

Between September 2020 and April 2021, Ilifa Labantwana, in collaboration with civil society and private sector partners, ran and administered a Covid-19 relief scheme for unregistered ELPs and (indirectly) the children in their care.[60] Its purpose was to safeguard unregistered ECD programmes during Covid-19 closures, offering income relief to their staff and supporting them to meet stringent reopening protocols. At the same time, the relief fund offered nutritional support to children that would otherwise be attending these ECD programmes and were now facing escalating child hunger and the risk of malnourishment. Digital vouchers were issued to ECD programmes, and these could be redeemed at local spaza shops, further stimulating local informal economies, which had been similarly hard-hit by the Covid-19 lockdown. In the process of offering immediate relief, Ilifa was also able to test systems for supporting unregistered ELPs to become nutrition hubs for young children using a digital voucher system.

The total value of the Ilifa Covid-19 Response Project was R36 million. Beneficiaries included 1,700 ELPs, 6,201 ECD staff, and more than 30,000 children across every province in South Africa. ELPs were supported through fortnightly food vouchers, Covid-19 compliance packs, and additional compliance support, such as water access and water storage. Sites could either cook for children attending their reopened programme, operate as a feeding scheme, or compile and provide food hampers to children. Staff of these sites also received monthly food vouchers as a form of income relief.

How it could be implemented

Eligible ELPs would need to enter into service level agreements with PEDs, agreeing to use the digital vouchers to purchase nutritious food for the young children in attendance. They would need to provide a mobile phone number, which would be designated to receive the vouchers on the ELP's behalf. Accurate information on the number of children attending the programme would also need to be captured and maintained.

The Ilifa Covid-19 Response Project made use of intermediary network organisations to identify and work with eligible ECD programmes, collecting relevant information for onboarding, monitoring, and

[60] Ilifa Labantwana (2021), "ECD COVID Response Project".

troubleshooting. It is likely that PEDs would also need to work with intermediary partners or networks in this way, in order to manage a voucher programme at scale and mitigate risks.

Vouchers could be delivered to verified beneficiaries—more on this below—using a voucher system with a participating voucher partner. There are multiple potential voucher partners, including large corporate partners, as well as organisations that work with more informal traders. However, such voucher systems are not interoperable, which has implications for the reach of a single potential voucher system; i.e. it would limit redemption to select participating suppliers.

Electronic vouchers could be sent to beneficiaries via SMS. The SMSs would notify recipients that they had received a voucher and indicate the amount, expiry date, and voucher PIN. Variable voucher values could be used for ELPs, and they could be delivered with differing frequencies if needed. Vouchers could be redeemed at relevant vendors using a digital payments machine (point of sale machine). Beneficiaries could redeem the whole amount, or a portion, in which case the system would automatically send a fresh PIN for the balance of the voucher.

Once vouchers are redeemed, they would be recorded as credit for a vendor. To effect payment from the fund, the voucher partner could send the fund manager (potentially the PED or an intermediary organisation) an invoice based on the number and value of vouchers redeemed against the list of beneficiaries. These would then be paid directly to the voucher partner.

To verify payment, the voucher partner could compile a regular redemption report, which would be used for financial reconciliation. Following each voucher run, implementing partners would need to use this redemption report to compile lists of identified beneficiaries who had either not received or not been able to redeem their voucher. Problems would then have to be resolved by field teams in collaboration with vendors.

Potential implementation advantages and challenges

The strength of a voucher distribution system is that it can deliver credit at speed and at scale, including to unbanked beneficiaries. As the Ilifa project showed, a digital voucher system can operate well as a mechanism for delivering nutrition support to ELPs. However, the Ilifa project's implementation

experience also highlighted important potential risks and challenges with voucher distribution for nutrition in South Africa.

Verifying beneficiaries and beneficiary information

Arguably, the biggest obstacle to the efficiency and security of a voucher system relates to verifying and maintaining beneficiary details, including the numbers of children attending each ELP. Further, recording a unique, stable, and accurate mobile phone number for each beneficiary presents added complications for finalising and maintaining beneficiary lists. Challenges can arise as a consequence of human error and a manual capturing system, or they may be related to the everyday utilisation of mobile phones and SIM cards. Beneficiaries without their own phones might choose to share a mobile number with someone else, producing duplicate mobile phone numbers and interrupting the process of verifying beneficiary information. The same can happen when phones are lost or stolen, or when individuals regularly change phone numbers in order to benefit from data plans related to different mobile networks.

Constraints with voucher systems

Given the complexity of capturing accurate beneficiary lists and the reality that staff and mobile phone numbers may change over time, each voucher run demands that some beneficiary data be edited in order to correct emerging problems. However, existing voucher systems are not always designed for making regular, easy, and efficient changes to beneficiary data. Furthermore, the ability to make changes to beneficiary lists may be centralised with the voucher partner and there may be challenges in knowing if changes have been implemented. There is a potential risk of vouchers getting sent to the wrong beneficiary if changes are not implemented timeously. Because the financial reconciliation is typically not conducted in real time but relies instead on a redemption report every day, voucher systems can also be slow to pick up such errors.

Requires support on the ground

Digital vouchers can be successful in particular geographical and ELP contexts, while they can be challenging to receive and redeem in isolated rural areas, especially without support from an implementing partner. Implementing partners and their field teams are essential to ensuring that a

voucher system runs smoothly. While many beneficiaries are able to easily redeem their vouchers, some may experience problems because of poor connectivity, lost or stolen phones, vouchers being accidentally deleted, or inaccurate capturing of phone numbers. Support needs to exist to address these challenges.

Limiting redemption to a provider network

The choice of voucher partner determines where vouchers can be redeemed. In some ways, this is a beneficial feature of vouchers: limiting misuse. However, to our knowledge, there is currently no voucher system that allows for redemption across a range of retailers and so using a voucher system would require the government to give preference to a particular group of stores. The voucher partners may include large retailers or partners who work with informal traders. Voucher partners who work with informal traders can help ensure that nutrition funds support local economies; however, working with informal traders may limit ELPs' freedom to choose where to purchase goods at the best prices. In addition, the government cannot make procurement decisions that provide competitive advantages to specific private sector actors. Therefore, the most ideal solution would be to gain agreement from retailers for an entirely interoperable voucher system. It is not unimaginable that this could be achieved for a national ECD nutrition support programme; however, this would require planning and investment over time.

Reduced burden of compliance

An advantage of a voucher system is that the expenditure is traceable, and due to the upfront work of linking beneficiary information to mobile data, a clear link can be established between individuals and the goods they eventually receive. While ideally vouchers could be limited to redemption of a subset of goods (i.e. food), current voucher systems are primarily limited to specific providers (with alternative forms of credit, such as airtime, being a notable exception). Voucher systems shift the burden of compliance reporting away from the intended beneficiary to other stakeholders, which could ease compliance burdens on informal ELPs that may otherwise struggle to gather and report comprehensive receipts for expenditure.

Comparing the potential implementation models

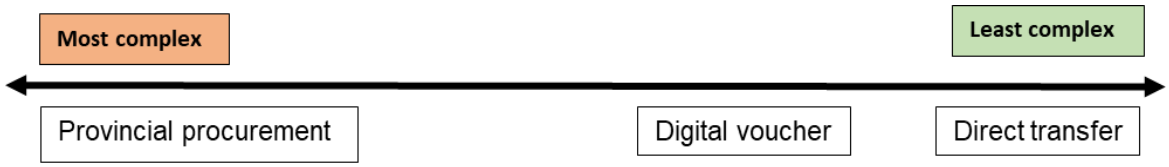
This section compares the three potential implementation models discussed in the previous section—provincial procurement and provision, direct transfers, and a digital voucher system—on five attributes: complexity of implementation mechanism, level of choice and diversity of food that can be offered, cost-efficiency, opportunity to support local food economies, and risk of fraud.

Complexity of implementation mechanism

The provincial procurement and provision model is complicated by the procurement, logistics, and storage requirements inherent to it. Regular deliveries of smaller quantities of goods would be necessitated by the limited storage space typically available at ECD programmes. Physically delivering parcels regularly to tens of thousands of ECD programmes, many of them in areas that are difficult to reach, is likely to be a complex exercise.

While the initial set-up of a digital voucher system would be complex, its routine operation would be relatively straightforward. The most complex aspects would be maintaining up-to-date mobile phone numbers to which vouchers are sent and ensuring ECD programmes have access to support when facing challenges with redemption.

The least complex of the three models is direct transfers. In this model, support would be provided directly to ECD programmes in a form that is most liquid and universal and requires only an initial verification of bank accounts at set-up.



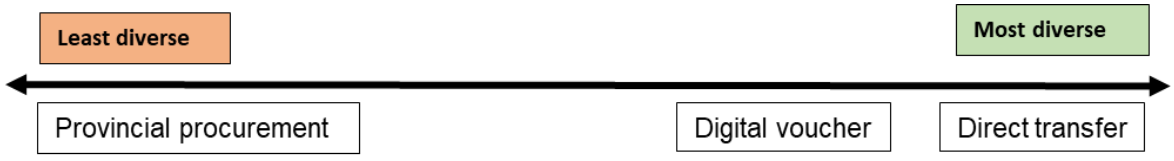
Level of choice and diversity of foods that can be offered

To what extent would the different models enable ECD programme choice in the types of foods that can be provided to children? What is the extent to which food diversity would be supported through each model?

The least diverse model in this regard is provincial procurement and provision. This model is not well suited for the provision of perishable goods, and it would need to be supplemented by the purchase of fresh foods at the programme level. The provision of a predetermined set of goods would also deny ECD programmes the freedom to choose foods that may be culturally or individually preferred.

A digital voucher system would allow for the inclusion of more diverse foods, allowing ECD programmes freedom to choose the goods they wish to purchase, but confining them to shopping at specified stores. While this should not significantly affect the range of foods from which they can choose, it would prevent them from being able to truly optimise their purchasing power. That said, international evidence is that food vouchers are preferable to food distribution in that they lead to a significantly larger nutrient intake per unit cost and larger increases in dietary diversity.[61]

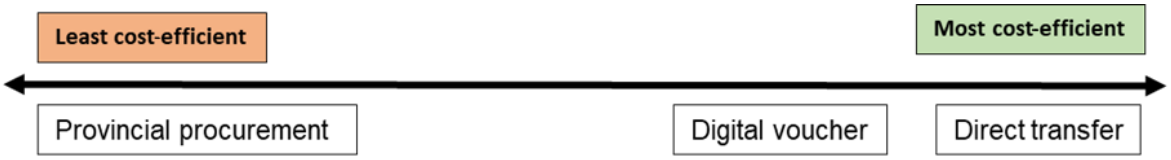
The model offering the most diversity of choice is direct transfers. This would enable ECD programmes to choose what foods they purchase and where, allowing them to respond to individual and cultural preferences and exercise their full choice as consumers.



[61] Hidrobo M, Hoddinott J, Peterman A, Margolies A, and Moreira, V (2014), "Cash, food or vouchers? Evidence from a randomized experiment in Northern Ecuador", *Journal of Development Economics* 107, 144–156.

Cost-efficiency

Cost-efficiency is understood here to be the proportion of funds that is ultimately likely to reach the child directly. A provincial procurement system is expected to be the least cost-efficient model. This is due to the high costs that would be required to store and transport goods to large numbers of small ECD programmes at frequent intervals; in many cases, in areas that are difficult to reach. Once established, a digital voucher system would be fairly efficient, with the main peripheral expenses including the cost of delivering SMSs and providing ongoing support to ECD programmes when redemption issues arise. Direct transfers would be the most efficient, with peripheral expenses mainly including bank transfer fees.



Opportunity to support local food economies

A nutrition support programme for children attending ECD programmes also has the potential to support local food economies and, in turn, contribute to improving food diversity and economic development in local communities. The model that is least supportive of local food economies is centralised procurement and provision, which is likely to favour large food producers based in economically strong areas. Direct transfers are likely to be spent locally, both in larger retail stores and possibly also at independently owned spaza shops and food vendors. The choice of digital voucher system would either target local spaza shops or specific retail groups.

Risk of fraud

There is risk of fraud in all models of implementation. As Corruption Watch has noted, for example, there is a continuing risk of corruption within the NSNP.[62] However, in a provincial procurement system, the risk of fraud is elevated due to the scale of the funding available in the contracts. With direct transfers to ELPs, funds would be distributed more widely, which would increase the opportunity for mismanagement of funds but decrease its impact and hence decrease the overall risk from any single instance of fraud.

A digital voucher system is also not immune to the risk of fraud. There is the possibility for fraud at implementing partners, as well as the possibility of vouchers reaching the wrong people as phones and phone numbers associated with beneficiaries are not as secure as bank accounts and can be shared or stolen, and phone numbers can change. While these risks are not insignificant, voucher information can be monitored for inconsistencies to identify fraud that has occurred.

It is important to contrast the risk of fraud in each of these implementation models with the risk of non-delivery of nutrition. More restrictive models may limit the risk of fraud while increasing the risk of non-provision, and the more restrictive delivery is, the greater the likelihood that vulnerable children will not receive nutrition.

Whether a provincial procurement and provision model, digital voucher system, or direct transfers model is used, a robust system to support whistle-blowing and to support investigations of alleged corruption is needed to mitigate against fraud.

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[62] Banjathwa, M (2023), "Looting, food safety remain a concern in school feeding programme", Corruption Watch, https://www.corruptionwatch.org.za/looting-food-safety-remain-a-concern-in-school-feeding-programme/

The discussion in this section points to the comparative advantage presented by direct transfers. This model is the least complex, offers the best opportunities for diverse and culturally relevant food choices, is the most cost-efficient, and has the lowest risk of large-scale fraud. It is also a mechanism that can serve to support local food economies, though not as strongly as a digital voucher system might. As with all other models, it would require sound support and monitoring systems to be in place. This mechanism is the most difficult for ELPs that are unregistered, and which may not have access to institutional bank accounts. Therefore, this mechanism is recommended for providing nutritional support to registered ELPs.

A digital voucher system also compares well on these criteria. In particular, it offers the strongest mechanism for supporting local food economies, while ranking second on each of the other metrics. However, a digital voucher system does not add benefits that direct transfers also cannot. In addition, since it requires a new and complex payment system, whereas direct transfers rely on existing systems, it in fact has a disadvantage. Finally, there is currently no way to limit voucher use solely to food, which means it would not allow the DBE to ensure the funds are used for their intended purpose any more than cash would. Therefore, the paper does not recommend this mechanism.

A provincial procurement and provisioning model has the least favourable attributes, but it may offer the best solution for unregistered and the least equipped of ELPs. Provincial procurement may allow the lowest meal costs, though these may be undermined by increased transport and storage costs. Even so, the model may be particularly suited to supporting unregistered ELPs, which may have limited ability to administer and report on their nutrition expenditure. This may thus make provincial procurement a necessary model in order to reach the most vulnerable children with nutrition support.

Part C. A dual implementation approach

Due to the diversity of settings, capacities, and facilities present at early learning programmes, as well as the discussion in Part B comparing the three potential implementation models, this paper suggests a dual implementation approach to delivering nutrition support for all eligible children at ELPs, regardless of their registration status, in South Africa. This aligns with a major, emerging lesson from a recent series of case studies,[63] conducted for Ilifa Labantwana, that nutrition support for children attending ELPs must meet the latter's needs in ways that are relevant to their context and situation. A one-size-fits-all approach is highly likely to become exclusionary for many ELPs. The fact that the National School Nutrition Programme already uses a range of models depending on the province suggests that this kind of flexibility could also work in the ECD sector. (See also Box 5 for an example from Lesotho.)

Box 5. Lesotho's school feeding programme[64]

Lesotho's school feeding programme is an example which demonstrates that a varied approach is possible at scale. The country uses three models—the "World Food Programme (WFP) model", which is more of a traditional food aid-style approach; the "government model", in which caterers offer a greater variety of locally procured foods; and the "National Management Agency model", which involves outsourcing procurement and delivery to agents.

So what is this dual implementation approach? It involves two main elements. First, for eligible children at registered ELPs, this approach calls for a direct transfer of the subsidy amount. In other words, all eligible children at registered ELPs should receive the subsidy, which includes a R6.80 contribution to nutrition provision. Second, for eligible children at unregistered ELPs, who are the most vulnerable children, an equitable amount of R6.80 should be allocated per child per day. This should be distributed

[63] Hartnack, H (2022), "Options for delivering nutrition".

[64] Devereux, S, Hochfeld, T, Karriem, A, Mensah, C, Morahanye, M, Msimango, T, Mukubonda, A, Naicker, S, Nkomo G, Sanders, D, and Sanousi, M (2018), "School feeding in South Africa: What we know, what we don't know, what we need to know, what we need to do", *Food Security SA Working Paper Series* no. 004, DST–NRF Centre of Excellence in Food Security, South Africa.

through a provincial procurement and delivery model, by either leveraging existing NSNP service providers or contracting with new ones to assist with food procurement and delivery to unregistered ELPs. New service providers could include strategic implementing partners in the non-governmental sector, which have numerous strengths to offer in this role, as discussed earlier in Part A of this paper (see also Müller, Ronaasen, and Besada).

In particular, ECD-focused NGOs could be contracted as strategic implementing partners to reach the ELPs in their networks, although the arrangement between them and the government would have to be different to the tendering process used currently in the NSNP with "service providers". This is because if commercial service providers were to be contracted on a competitive basis (through the normal tender process) in the same context, they would not have the same existing relationship with ECD sites, nor be able to support them in the range of ways these sites need to offer good nutritional support. There are large intermediary NGOs working in the ECD space that have proposed the idea that the government partner with them as a delivery platform for ECD services. Such intermediaries would have a large network of ECD sites and could provide them with support in recruitment, curriculum delivery, training, and quality assurance, as well as in meeting other needs including nutrition provision. Such intermediary NGOs would also build relationships with other NGOs and entities more focussed on nutrition provision, ensuring that they can reach a wide number of sites, and their activities are effective.

Across both models comprising the proposed dual implementation approach, there would be a need for regular support, monitoring, and reporting to ensure that funds are used for their intended purpose and that support ultimately benefits poor young children. Irrespective of the model used, this would involve a combination of self-reporting and risk-based monitoring to confirm the accuracy of information reported.

The NSNP monitoring system should be leveraged as far as possible. There are currently 500 individuals employed at district and provincial level by the DBE whose sole job it is to support monitoring, reporting, and responding (MRR) processes and hold schools accountable on all areas relating to the NSNP. Each of these monitoring personnel works with 40 schools to ensure that they can implement the MRR system, which helps the schools to hold themselves accountable. There may be an opportunity to leverage these MRR processes and personnel for monitoring and supporting ELPs as well.

Estimated costs of a national ECD nutrition programme

An important factor in considering the expansion of nutrition support to ELPs is that the unit costs would be different from those in the National School Nutrition Programme. As mentioned earlier, the NSNP currently budgets R3.50 per learner per day for primary school learners and R4.25 for secondary school learners. This allocation covers the cost of meals, cooking fuel, and stipends paid to meal preparers at the schools.[65] Unlike schools, full-time ECD programmes care for children for the whole day, and they typically provide breakfast and lunch and, according to the Department of Health's Nutrition Guidelines for Early Childhood Development Programmes (hereinafter Nutrition Guidelines), should also provide two nutritious snacks. (For more on the Nutrition Guidelines, see Müller, Ronaasen, and Besada). Though meal sizes for young children are smaller than for older children, the nutritional density required to support healthy development increases the cost of provision. In addition, the average size of an ECD programme—39 children, according to the 2021 ECD Census[66]—is much smaller than that of a school and therefore it is unable to achieve the same economies of scale, particularly when transport costs are considered.

So how much would it cost to provide adequate nutrition to all eligible children at all early learning programmes? First, a word on eligibility. Eligible children are those eligible to receive the ECD subsidy, which is means tested based on parental income.[67] While some provinces are not yet aligned, the means test for the ECD subsidy should be aligned with that for the Child Support Grant.[68]

Then, not all eligible children in registered ELPs currently receive the ECD subsidy. It is estimated that an additional 200,000 children are eligible to receive the subsidy at registered facilities that currently

[65] Fuel, What We Do, https://www.fuel.org.za/what-we-do/index.html accessed 20 September 2022.

[66] Department of Basic Education (2022), *ECD Census 2021*, 29.

[67] Giese, S and Budlender, D (2011), "Government funding for early childhood development", *Ilifa Labantwana Learning Brief* no. 1, Ilifa Labantwana, https://ilifalabantwana.co.za/wp-content/uploads/2017/06/Government-funding-for-ECD-in-South-Africa-summary.pdf

[68] This threshold is detailed in the 2023 ECD conditional grant framework and further reiterated in Department of Basic Education (2023), Media Release, 26 January 2023, https://www.fedsas.org.za/FileHandler/fc73da51-21cf-40d0-87fe-4a6230162d83#:~:text=The%20DBE%20recognises%20that%20a,not%2Dfor%2Dprofit%20registration

do not have access to it.[69] Expanding the R17 per child per day subsidy to an additional 200,000 eligible children would cost the fiscus an additional R897.6 million, with R359 million (40%) of this intended for nutrition expenditure, as per the current subsidy guidelines. Registered ELPs would receive these funds as direct transfers.

Further, it is estimated that there are 695,292 eligible children aged 0–5 in unregistered ECD programmes that have facilities for meal preparation.[70] In line with the principle of equity, there is arguably a strong justification for supporting eligible children at unregistered facilities at the same cost as eligible children at registered facilities. If nutrition support is costed at R6.80 per child per day, as per the 40% subsidy allocation in the current guidelines, then the cost of expanding nutrition support to these children amounts to R1.25 billion.

The estimated total additional cost of providing nutrition support for (a) all eligible children at registered ELPs that do not currently benefit from the ECD subsidy and (b) all eligible children at unregistered ELPs is therefore R1.6 billion, or R1.65 billion including an estimated 3% administration fee. This estimation is based on the current R6.80 per child per day allocation for nutrition in the subsidy; and it captures only the cost of expanded nutrition provision (i.e. the subsidy's nutrition component), and not the full subsidy, to those not receiving it.

That said, it is also important to acknowledge that R6.80 is likely insufficient to enable ELPs to comply with the Nutrition Guidelines. A costing exercise was completed in 2022 for an ideal menu (i.e. a menu aligned to the Nutrition Guidelines), taking into account food costs, gas costs, and overheads for service providers (not including transport costs). The total cost of this ideal menu came to R10.70 per child per day (at wholesale food prices) in 2022; taking inflation into account, this amounts to R12.09 in 2023 terms. Providing a menu aligned with the Nutrition Guidelines to all eligible children currently attending ELPs—including those registered and subsidised, registered but unsubsidised, and unregistered—at a per child cost of R12.09, would cost an estimated R4.8 billion (in 2023 terms) in total. This cost is just over half the current NSNP budget of R9.3 billion (as noted earlier).

[69] Calculation based on 2021 ECD Census data and figures contained in Dulvy et al. (2023), *South Africa Public Expenditure and Institutional Review*, 150.

[70] Calculation based on 2021 ECD Census data.

Also pointing to the inadequacy of the R6.80 for supporting nutrition, the World Bank notes that the current R17 ECD subsidy has not been adequately adjusted for inflation since 2015, and, as a result, the real value of the subsidy has decreased over time and is insufficient to cover the nutritional and additional needs of children attending ELPs.[71] An increase in the subsidy to R21 would essentially return it to its real value in 2015, with the World Bank recommending that the ECD subsidy be increased to R31 to cover the minimum costs of operating a programme.[72] Applying the current 40% allocation for nutrition to this recommended subsidy increase would translate to an increase in the nutrition allocation from R6.80 to R12.40 per child per day; this figure being comparable to the costing of the ideal menu detailed above.

However, in a climate of job/wage freezes and budget cuts, there is an unavoidable need for prioritisation and taking a phased approach, from a cost perspective. The priority, as this paper advocates, ought to be to reach all eligible children—regardless of whether they are attending registered or unregistered ELPs—and so, the recommendations that follow in the next part of the paper are based on expanding access to nutrition support using the R6.80-per-child-per-day funding framework, rather than on increasing its per-child-per-day value, at the estimated total additional cost of R1.65 billion. This will prioritise funding to the most vulnerable children with the most to gain from a nutrition support programme, i.e. those from means-tested poor households whose nutritional needs it is more likely are not being met. While the additional cost may still be a sizable demand on a strained fiscus, it should be considered in light of the considerable hidden costs resulting from premature childhood mortality, poor educational attainment, and reduced earning power across the lifespan (see Müller, Ronaasen, and Besada). For example, a 2017 study estimated that stunting costs South Africa 1.3% of gross domestic product (GDP), or R62 billion per annum;[73] with a more recent

[71] Dulvy et al. (2023), *South Africa Public Expenditure and Institutional Review*, 150.

[72] Dulvy et al. (2023), *South Africa Public Expenditure and Institutional Review*, 56.

[73] Jamieson, L and Richter, L (2017), "Striving for the Sustainable Development Goals:
What do children need to thrive?", in *Child Gauge 2017*, Children's Institute, University of Cape Town, 33–42,
https://ci.uct.ac.za/sites/default/files/content_migration/health_uct_ac_za/533/files/Child_Gauge_2017_lowres.pdf

study in the Lancet suggesting that investing in effective direct nutrition interventions also yields a substantial return on investment.[74]

Funding framework

To reach unregistered programmes, funds could be channelled through the ECD conditional grant, under a third, separate component alongside the subsidy and infrastructure components. This option would allow the DBE and National Treasury to determine and monitor the amounts allocated to each province and performance against set targets. It would require a revision of the grant framework to include this third component and articulation of the eligibility criteria for ELPs to receive the funds. The advantage of this is that all ECD funding and reporting would be centralised within a single funding and reporting framework.

A second option would be to house the funds in the NSNP conditional grant. This grant is also managed by the DBE, which then makes payments to provincial education departments according to implementation plans. This would require amendments to the conditional grant framework to include an ECD component with its own criteria and implementation guidelines. The advantage of this is that it would centralise management of all nutrition support within a single funding and reporting framework. (See also Kazim, for recommendations on policy developments alongside this.)

[74] Akseer, N, Tasic, H, Onah, MN, Wigle, J, Rajakumar, R, Sanchez-Hernandez, D, Akuoku, J, Black, RE, Horta, BL, Nwuneli, N, Shine, R, Wazny, K, Japra, N, Shekar, M, and Hoddinott, J (2022), "Economic costs of childhood stunting to the private sector in low- and middle-income countries", *The Lancet* 45, https://doi.org/10.1016/j.eclinm.2022.101320

Part D. Policy recommendations

This paper rests on the premise that nutrition support is necessary and possible regardless of the registration status of an early learning programme. Any national ECD nutrition programme should therefore include strategies that allow both registered and unregistered ELPs to feed young children attending these programmes.

The paper has explored three models for how the Department of Basic Education might approach providing nutrition support to ELPs, comparing their advantages and disadvantages in turn and then against each other on key metrics. The most favourable of the models reviewed is direct transfers. While this model is most appropriate for registered ELPs, it may not be as appropriate for unregistered programmes. Rather, in the case of unregistered ELPs, service providers or strategic implementing partners could be leveraged to procure and deliver food to them. Specifically, this could be achieved through a provincial procurement and provisioning model for unregistered ELPs with meal preparation facilities. This paper has not dealt with implementation models for unregistered ELPs without such facilities, and this will need to be explored further elsewhere. Due to the diversity of settings, capacities, and facilities present at ELPs in South Africa, the paper has thus proposed a dual implementation approach, which is captured in the following recommendations, a sub-set of which are directed at the DBE's planned ECD nutrition pilot.

Key recommendations

- **Registered early learning programmes** serving eligible children should receive nutrition support as part of the ECD subsidy, which is administered as a direct transfer. This should remain the strategy for providing nutrition support to these programmes as it reduces the requirement for the state to pay for transport and storage of food, allows greater choice in what to buy, builds the agency of ELPs, supports local economies, and reduces the potential scale of fraud. Given this, it is important that the existing 40% of the R17 per child per day ECD subsidy continue to be provided directly to registered ELPs, and not be managed directly by the DBE. Rather, the subsidy should be expanded as a matter of urgency to all eligible children at registered ELPs (approximately 200,000 additional children).

- In the case of **unregistered programmes**:
    - In provinces using the centralised NSNP model, the existing service providers in each province should be leveraged, where possible, to provide groceries to eligible unregistered ELPs that have the means to prepare food. Meal value per child should equal the R6.80 currently provided by the subsidy, and this should increase as the subsidy increases.
    - In provinces using the decentralised NSNP model, provincial education departments should enter new service level agreements, either with commercial service providers or with strategic implementing partners, to purchase food on behalf of eligible unregistered ELPs with kitchens. Meal value per child should equal the R6.80 currently provided by the subsidy, and this should increase as the subsidy increases.
- Given that this dual implementation approach does not make provision for ELPs without kitchens, but which equally need support to ensure that the children attending them get adequately nutritious meals, the DBE needs to consider ways of reaching these programmes in the medium term.
- The NSNP's monitoring, responding, and reporting processes should be leveraged to support an ECD nutrition programme as far as possible. Strategic implementing partners could also be contracted to support a range of processes, including beneficiary verification, monitoring, and support.
- Regardless of the model used for implementation, fraud mitigation should include risk-based monitoring and support for whistle-blowing and investigations of alleged corruption or mismanagement.

Key recommendations for the ECD nutrition pilot

The DBE has additional funds available in 2024/2025 (R297 million) and 2025/2026 (R396 million) to pilot a nutrition support programme and a results-based service delivery model.[75] While the amount that will be allocated to the pilot nutrition support programme is not known, this paper sets out recommendations for the design of the pilot. These recommend, inter alia, piloting the dual

[75] National Treasury (2023), Division of Revenue Bill B2—2023, 86 and 318.

implementation approach put forward in the paper and drawing out lessons to inform the design of a nutrition support programme for roll-out at scale.

- Since direct transfers are already made to subsidised ELPs, the focus should be on testing the two modalities for reaching the most vulnerable children situated in unregistered ELPs.
    - In one or more provinces that deliver the NSNP using the centralised model, the pilot should test whether a sample of existing service providers contracted by PEDs can effectively deliver food to a sample of unregistered ELPs located near the schools they service. The pilot should monitor the delivery of food by the service provider to the ELPs, and its provision to children in the form of healthy meals that adhere to the proposed menu.
    - In one or more provinces that deliver the NSNP using the decentralised model, a number of strategic implementing partners or commercial service providers should be contracted to procure and deliver food to a sample of unregistered ELPs located reasonably near to them. In these provinces, the pilot should monitor the delivery of food by the service provider to the ELPs, and its provision to children in the form of healthy meals that adhere to the proposed menu.
- As part of the pilot, all beneficiary ELPs should be trained on the Nutrition Guidelines and their implementation. To assess impact, the pilot's design should further include (a) anthropometrics monitoring to determine whether feeding has an impact on children's nutritional status (including stunting) and (b) attendance monitoring to determine the extent to which feeding improves child attendance.
- A portion of pilot funds should thus be set aside to enable implementation support, and monitoring and evaluation of the pilot. For the purposes of monitoring and evaluation, in particular, it would be further useful to include a sample of ELPs that are already receiving the ECD subsidy. This would allow the pilot to make observations about delivery across all the proposed models. The pilot should, inter alia, assess
    - the extent to which the NSNP monitoring system can be leveraged for an ECD nutrition support programme;
    - whether strategic implementing partners can support beneficiary verification, monitoring, and support processes;

- whether there are significant benefits or costs of using existing NSNP service providers or working with new strategic implementing partners; and
- whether there are barriers to ELPs being able to adequately prepare meals for children in accordance with the proposed menus.

- The pilot programme is also a critical opportunity to collect data and information and to fill gaps in our existing knowledge about the ECD landscape, which can altogether help to further develop/refine the most appropriate model for providing nutrition support to unregistered ELPs in particular. This includes collecting baseline data on water, kitchen, and storage facilities, as well as energy use, for planning purposes; and identifying non-food costs (such as for transport, cooking fuel, and monitoring and evaluation) in respect of the provincial procurement and delivery model for reaching unregistered ELPs.

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