

The Case for Healthy School Meals for All

INTRODUCTION

The School Nutrition Programs are vital tools

for combating childhood hunger, improving children's health, and supporting academic achievement. The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are the two largest child nutrition programs, feeding nearly 30 million¹ and 15 million students² on an average day in fiscal year 2019, respectively. Many students who participate in these programs come from families earning low incomes (22 million and 12.6 million, respectively)³ and receive their meals for free or at a reduced price. The COVID-19 pandemic has highlighted the critical role of school meals in alleviating childhood food insecurity while also demonstrating the value of offering school meals at no charge to all students.



Healthy School Meals for All — offering school breakfast and lunch to all students at no charge — helps ensure that all children have the nutrition they need to grow and thrive, and helps overcome the numerous barriers that limit participation. Implementing Healthy School Meals for All accomplishes the following goals:

- ▶ ensures access to nutritious meals to all students as a key educational and health support;
- ▶ eliminates the tiered eligibility system that limits participation for too many children whose families are struggling to make ends meet;
- ▶ reduces the stigma associated with participating in school meals;
- ▶ eliminates school meals debt; and
- ▶ significantly reduces the administrative work required to operate the School Nutrition Programs and improves school nutrition finances.

Prior to the pandemic, 1 in 3 schools participating in the School Nutrition Programs was offering Healthy School Meals for All through the Community Eligibility Provision,⁴ allowing their students, families, and school nutrition departments to experience its many benefits (for more information on the federal options that are available to offer school meals to all students at no charge, see page 3). From March 2020 through the 2021–2022 school year, all schools have been given the opportunity to implement Healthy School Meals for All through the child nutrition waivers. These waivers have supported access to school meals, as well as school meal operations, throughout the challenging and difficult circumstances created by the pandemic. In order to overcome the educational, health, and economic impacts of the pandemic on children and families, and the financial challenges created by the pandemic for school nutrition departments, Healthy School Meals for All should remain the new normal for all schools across the country.

1 U.S. Department of Agriculture. (2021). National Level Annual Summary Tables: FY 1969–2020 (preliminary data for Fiscal Year 2019). National School Lunch Program: Participation and Lunches Served. Available at: <https://fns-prod.azureedge.net/sites/default/files/resource-files/slsummar-6.pdf>. Accessed on June 13, 2021.

2 U.S. Department of Agriculture. (2021). National Level Annual Summary Tables: FY 1969–2020 (preliminary data for Fiscal Year 2019). School Breakfast Program Participation and Meals Served. Available at: <https://fns-prod.azureedge.net/sites/default/files/resource-files/sbsummar-6.pdf>. Accessed on June 13, 2021.

3 Food Research & Action Center. (2021). *School Breakfast Scorecard School Year 2019–2020*. Available at: https://frac.org/wp-content/uploads/FRAC_BreakfastScorecard_2021.pdf. Accessed on June 13, 2021.

4 Food Research & Action Center. (2020) *Community Eligibility: The Key to Hunger Free Schools School Year 2019–2020*. Available at: <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf>. Accessed on June 13, 2021.

School Meals: A Key Educational and Health Support

School meals are just as important to students' academic success as textbooks or transportation.

All children need a nutritious breakfast to start the school day ready to learn, and a nutritious lunch to continue learning through the afternoon until the school bell rings. School breakfast and lunch offer an important opportunity to make sure that every child has the nutrition they need in order to excel in school. Students who are sitting in class hungry, because they were unable to participate in school lunch or breakfast, are missing out on the chance to learn. These meals are just as important to students' academic success as textbooks or transportation.

Extensive research has linked participation in school meals to a number of benefits:

- ▶ improving academic achievement, standardized test scores, and cognitive function;^{5,6,7}
- ▶ improving attendance, which is positively linked to academic achievement;^{8,9}
- ▶ reducing food insecurity, which is linked to poor academic outcomes;¹⁰
- ▶ improving nutrition, such as by increasing the consumption of fruit, vegetables, and milk;¹¹

HOW THE SCHOOL NUTRITION PROGRAMS CURRENTLY WORK

WHO OPERATES THE SCHOOL NUTRITION PROGRAMS?

Any public school, nonprofit private school, or residential child care institution can participate in the School Breakfast Program (SBP) and/or the National School Lunch Program (NSLP) and receive federal funds for each meal served. The program is administered at the federal level by the U.S. Department of Agriculture and in each state, typically through the state department of education or agriculture.

WHO CAN PARTICIPATE IN THE SCHOOL NUTRITION PROGRAMS?

Any student attending a school that offers SBP or NSLP may participate. What the federal government covers, and what a student pays, depends on family income.

- ▶ Children from families with **incomes at or below 130 percent** of the Federal Poverty Level (FPL) are eligible for free school meals.
- ▶ Children from families with **incomes between 130 to 185 percent** of the FPL qualify for reduced-price meals.
- ▶ Children from families with **incomes above 185 percent** of the FPL pay charges (referred to as “paid meals”), which are set by the school.

Other federal and, in some cases, state rules, however, make it possible to offer free meals to all children, or to all children in households with incomes under 185 percent of the FPL, especially in schools with high proportions of low-income children.

HOW ARE CHILDREN CERTIFIED FOR FREE OR REDUCED-PRICE MEALS?

Most children are certified for free or reduced-price school meals via applications collected by the school district at the beginning of the school year or during the year. However, children in households participating

in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), the Food Distribution Program on Indian Reservations (FDPIR), and Medicaid (in some states), as well as foster youth, migrant, homeless, or runaway youth, and Head Start participants are “categorically eligible” (automatically eligible) for free school meals and can be certified without submitting a school meal application.

School districts are required to “directly certify” children in households participating in SNAP for free school meals through data-matching of SNAP records with school enrollment lists. School districts have the option of directly certifying other categorically eligible children as well. Some states also use income information from Medicaid to directly certify students as eligible for free and reduced-price school meals.

Schools also should use data from the state to certify categorically eligible students. Schools can coordinate with other personnel, such as the school district’s homeless and migrant education liaisons, to obtain documentation to certify children for free school meals. Some categorically eligible children may be missed in this process, requiring the household to submit a school meal application. However, these households are not required to complete the income information section of the application.

HOW ARE SCHOOL DISTRICTS REIMBURSED?

The federal reimbursement rate that schools receive for each meal served depends on whether a student is receiving free, reduced-price, or paid meals. The rate is adjusted annually on July 1 based on inflation. For the most up-to-date reimbursement rates, refer to the *Reimbursement Rates and Income Guidelines for the Federal Child Nutrition Programs*.

5 Vaisman, N., Voet, H., Aklivis, A., & Vakili, E. (1996). *Effects of Breakfast Timing on Cognitive Functions of Elementary School Students*. Available at: <https://pubmed.ncbi.nlm.nih.gov/8859144/>. Accessed on June 15, 2021.

6 Ptomey, L. T., Steger, F. L., Schubert, M. M., Lee, J., Willis, E. A., Sullivan, D. K., Szabo-Reed, A. N., Washburn, R. A., & Donnelly, J. E. (2016). *Breakfast intake and composition is associated with superior academic achievement in elementary schoolchildren*. Available at: <https://pubmed.ncbi.nlm.nih.gov/26697955/>. Accessed on June 15, 2021.

7 Frisvold, D. E. (2015). *Nutrition and cognitive achievement: an evaluation of the School Breakfast Program*. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0047272714002497>. Accessed on June 15, 2021.

8 Murphy, J. M. (2007). *Breakfast and learning: an updated review*. Available at: https://www.researchgate.net/publication/228638584_Breakfast_and_Learning_An_Updated_Review. Accessed on June 15, 2021.

9 Basch, C. E. (2011). *Breakfast and the achievement gap among urban minority youth*. Available at: <https://pubmed.ncbi.nlm.nih.gov/21923876/>. Accessed on June 15, 2021.

10 Huang, J., & Barnidge, E. (2016). *Low-income children's participation in the National School Lunch Program and household food insufficiency*. Available at: <https://pubmed.ncbi.nlm.nih.gov/26722983/>. Accessed on June 14, 2021.

11 Clark, M. A., & Fox, M. K. (2009). *Nutritional quality of the diets of U.S. public school children and the role of the school meal programs*. Available at: <https://pubmed.ncbi.nlm.nih.gov/19166672/>. Accessed on June 14, 2021.

- ▶ reducing poor health outcomes and obesity rates;¹²
- ▶ improving student behavior, including one study that found drops in suspension rates in middle and elementary school students after their schools implemented the Community Eligibility Provision;^{13,14} and
- ▶ improving mental health and reducing anxiety and depression.¹⁵

Healthy School Meals for All increases participation in school meals, allowing more students to reap these benefits. The educational and health impacts can be long lasting, supporting better outcomes for children that extend into adulthood. For more information on the positive impacts of the School Nutrition Programs, read the Food Research & Action Center’s *School Meals are Essential for Student Health and Learning; Breakfast for Learning; Breakfast for Health; and The Connections Between Food Insecurity, the Federal Nutrition Programs, and Student Behavior*.

Offering Free Meals to Some Children Leaves Many Behind

As vital as the School Nutrition Programs are to ensuring children’s access to healthy, nutritious meals, too many children in need are left out due to the current program structure. Children are certified to receive free school meals if their household’s income is at or below 130 percent of the Federal Poverty Level. This translates into an annual income of less than \$35,000 for a family of four for the 2021–2022 school year.¹⁶ The livable salary for a family of four¹⁷ in the U.S. back in 2019 was nearly \$69,000.¹⁸ That does not take into account regional differences in the cost of living. This discrepancy between eligibility and the living wage means that many families who are struggling to make ends meet do not qualify for free (or even reduced-price) school meals.

CURRENT WAYS TO OFFER SCHOOL MEALS FREE TO ALL

There are federal options that allow schools to offer free meals for all students, with federal reimbursements based on the proportions of low-income children in the school.

- ▶ **The Community Eligibility Provision** allows high-poverty schools to offer free breakfast and lunch to all students. They do not collect, process, or verify school meal applications, or keep track of meals by fee category, resulting in significant administrative savings and increased participation. School districts, a group of schools within a district, or a single school can participate if at least 40 percent of the students are categorically eligible for free school meals and are certified to receive them outside of the school meal application process such as through direct certification. This is called the Identified Student Percentage (ISP). To account for the additional students who would be eligible for free or reduced-price meals, the ISP is multiplied by 1.6.
- ▶ **Provision 2** (referring to a provision of the National School Lunch Act) schools do not need to collect, process, or verify school meal applications or keep track of meals by fee category for at least three out of every four years. Schools collect school meal applications and count and claim meals by fee category during year one of the multi-year cycle, called the “base year.” Those data then determine the federal reimbursement and are used for future years in the cycle. Provision 2 schools have the option to serve only breakfast or lunch, or both breakfast and lunch, to all students at no charge, and use economies of scale from increased participation and significant administrative savings to offset the cost of offering free meals to all students.
- ▶ **Provision 3** allows schools to offer free meals to all students for a four-year cycle while receiving the same level of federal reimbursements with adjustments due to changes in enrollment, inflation, or operating days. Like Provision 2, the level of reimbursement is determined in a base year, but, unlike Provision 2, the base year is not part of the four-year cycle of offering free meals, and schools can charge for meals served to students who are not eligible for free school meals in the base year.
- ▶ **Under Provisions 2 and 3**, there is no federal requirement that schools have a certain percentage of students certified to receive free or reduced-price school meals. But the school must cover the costs of providing free meals to all students that are not covered through the federal school meal reimbursements with non-federal dollars.

12 Gundersen, C., Kreider, B., & Pepper, J. (2012). *The impact of the National School Lunch Program on child health: a nonparametric bounds analysis*. Available at: <https://www.sciencedirect.com/science/article/abs/pii/S0304407611001205>. Accessed on June 14, 2021.

13 The Community Eligibility Provision (CEP) is a provision that allows schools to serve free meals to all students depending on the levels of poverty within the school. For more information, see the text box on page 3.

14 Gordon, N. E., & Ruffini, K. J. (2018). *School Nutrition and Student Discipline: Effects of Schoolwide Free Meals*. Available at: <https://www.nber.org/papers/w24986>. Accessed on June 13, 2021.

15 Kleinman, R. E., Hall, S., Green, H., Korzec-Ramirez, D., Patton, K., Pagano, M. E., & Murphy, J. M. (2002). *Diet, breakfast, and academic performance in children*. Available at: <https://pubmed.ncbi.nlm.nih.gov/12428078/>. Accessed on June 13, 2021.

16 U.S. Department of Agriculture Food and Nutrition Service. (2021). *Child Nutrition Programs: Income Eligibility Guidelines*. Available at: <https://www.govinfo.gov/content/pkg/FR-2021-03-04/pdf/2021-04452.pdf>. Accessed on June 13, 2021.

17 The measure assumes two working parents and two children in the household.

18 Massachusetts Institute of Technology. (2020). *Living Wage Calculator*. Available at: <https://livingwage.mit.edu/articles/61-new-living-wage-data-for-now-available-on-the-tool>. Accessed on June 11, 2021.

A family of four qualifies for school meals at a reduced price if they earn about \$49,000 or less annually, which is still significantly lower than the livable salary. The \$0.30 copay for breakfast and the \$0.40 copay for lunch that schools can charge a student who is certified to receive reduced-price school meals can create a significant barrier to participation. Prior to the start of the pandemic, there were over 2.6 million children certified for reduced-price school meals,¹⁹ but only 741,000 participated in school breakfast,²⁰ and 1.7 million participated in school lunch.²¹

It is also important to note that the certification process for free and reduced-price school meals is not a perfect system, with some eligible children not being certified. This can be due to school meal application barriers, including literacy and language barriers. Eligible children also lose access during the verification process. School districts are required to verify a certain percentage of approved school meal applications. The standard method requires the lesser of 3 percent or 3,000 approved applications. Families who do not respond are automatically removed from the program. An analysis by the U.S. Department of Agriculture (USDA) found that nearly 1 in 3 families did not respond to the verification requests.²² When this happens, children may lose the benefits provided by free or reduced-price school meals even though they may be eligible to receive them.²³

The link to free school meals for children who are categorically eligible for free school meals has become much stronger and reduced the number of children who are certified through the school meal application process, primarily because Congress required all states to directly certify children whose households participate in the Supplemental Nutrition Assistance Program (SNAP) for free school meals through the Child Nutrition and WIC Reauthorization Act of 2004, and then set a benchmark for states to directly certify at least 95 percent by 2013 through the Healthy Hunger-Free Kids Act of 2010. These congressional actions and technical assistance on direct certification from USDA have significantly strengthened direct certification. The recently released direct certification report on the 2018–2019 school year shows that nationally 98 percent were directly certified, an increase from 92 percent in the 2016–2017 school year. Still, 12 states have not reached the national benchmark, with nine certifying fewer than 90 percent or missing at least 1 in 10 who should have been automatically linked to free school meals.²⁴

Stigma Keeps Children Who Need School Meals From Participating

School districts spend a significant amount of time certifying students for free or reduced-price school meals each year. In October 2019, over 27 million children were certified for free school meals and more than 2.6 million were certified for reduced-price school meals.²⁵ Yet millions of children — in some states, estimates are as high as 1 in 3 eligible students²⁶ — who could receive a free school breakfast or lunch are choosing not to participate. The stigma felt by students that the program is “for poor kids” drives many children away.²⁷ This is especially true in schools with a high diversity of income levels, where free and reduced-price eligible students can be labeled “poor” by their classmates, thus discouraging participation not only for paying students but also for the low-income students who stand to benefit most from school meals.²⁸ This stigma can also be felt by parents, as research identifies stigma as a primary reason for parents not submitting school meal applications for their eligible children.²⁹ Offering school meals free of charge to all students regardless of income helps reduce the stigma associated with participating in school meals, bringing the educational and health benefits of school meals to more students.

19 Certification data reported to the U.S. Department of Agriculture by state child nutrition agencies. Data include all 50 states and the District of Columbia.

20 Food Research & Action Center. (2021). *School Breakfast Scorecard School Year 2019–2020*. February 2021. Available at: https://frac.org/wp-content/uploads/FRAC_BreakfastScorecard_2021.pdf. Accessed on June 13, 2021.

21 U.S. Department of Agriculture. (2021). National Level Annual Summary Tables: FY 1969–2020 (preliminary data for Fiscal Year 2019). National School Lunch Program: Participation and Lunches Served. Available at: <https://fns-prod.azureedge.net/sites/default/files/resource-files/slsu2020.pdf>. Accessed on June 13, 2021.

22 U.S. Department of Agriculture Food and Nutrition Service. (2011). Analysis of Verification Summary Data School Year 2008-2009, Executive Summary. Available at: https://fns-prod.azureedge.net/sites/default/files/VerificationSummaryReport_ExecSum.pdf. Accessed on June 13, 2021.

23 U.S. Department of Agriculture Food and Nutrition Service. (2003). *NSLP Certification Accuracy Research Summary of Preliminary Findings*. Available at: <https://fns-prod.azureedge.net/sites/default/files/NSLPCertResearchPolicy.pdf>. Accessed on June 17, 2021.

24 U.S. Department of Agriculture Food and Nutrition Service. (2021). *Direct Certification in the National School Lunch Program State Implementation Progress Report to Congress SY 2017–2018 and SY 2018–2019*. Available at: <https://www.fns.usda.gov/cn/direct-certification-national-school-lunch-program-state-implementation-progress-report>. Accessed on June 23, 2021.

25 Certification data reported to the U.S. Department of Agriculture by state child nutrition agencies. Data include all 50 states and the District of Columbia.

26 Brown, A., & Bilski, J. (2017). *Fighting the stigma of free lunch: Why universal free school lunch is good for students, schools, and families*. Available at: <https://www.fordfoundation.org/just-matters/just-matters/posts/fighting-the-stigma-of-free-lunch-why-universal-free-school-lunch-is-good-for-students-schools-and-families/>. Accessed on June 14, 2021.

27 Poppendieck J. (2010). *Free for All: Fixing School Food in America*. Available at: <https://www.ucpress.edu/book/9780520269880/free-for-all>. Accessed on June 14, 2021.

28 Leos-Urbel, J., Schwartz, A. E., Weinstein, M., & Corcoran, S. (2013). *Not just for poor kids: The impact of universal free school breakfast on meal participation and student outcomes*. Available at: <https://doi.org/10.1016/j.econedurev.2013.06.007>. Accessed on June 14, 2021.

29 Glantz, F., Berg, R., Porcari, D., Sackoff, E., & Pazer, S. (2013). *School Lunch Eligible Non-Participants: Final Report. Food and Nutrition Service*. Submitted to U.S. Department of Agriculture. As cited in Leos-Urbel, et al. *Not just for poor kids: The impact of universal free breakfast on meal participation and student outcomes*. Available at: <https://doi.org/10.1016/j.econedurev.2013.06.007>. Accessed on June 14, 2021.

School Meals Debt Hurts Students, Families, and Schools

School meals debt can occur when students who are not certified to receive free school meals arrive in the cafeteria without cash in hand or in their school meals account to pay for their meals or for the “reduced-price” copayment. USDA requires all school districts that participate in NSLP to have, and to clearly communicate, an unpaid school meals fees policy. Each school district’s policy is meant to guide the district’s response when a child arrives in the cafeteria without cash in their school meals account or without cash in hand. USDA’s guidance does not establish any national standards for what needs to be included in a school district’s policy, nor does it provide any baseline for protecting children and families; instead, it only requires that there be a policy.

Prior to the pandemic, 3 out of 4 school districts reported struggling with school meals debt. Numerous news stories that covered the issue highlighted school districts’ practices of providing partial meals with weak nutritional value, and identifying and embarrassing students who owe school meals debt, all of which reflected the financial struggle for school districts as they contended with school meals debt and the impact it had on their school budgets.

During the pandemic, schools have been able to offer meals at no charge to all students, and the news stories of school meals shaming have disappeared. Healthy School Meals for All eliminates the concerning practices that schools implement in response to unpaid school meals fees and the financial burden upon schools and families. It is the only way to completely eliminate school meals debt, while still ensuring that children are well nourished and in class ready to learn.

Reduce the Administrative Burden and Improve School Nutrition Finances

The current structure of the School Nutrition Programs requires schools to spend a significant amount of time and resources collecting and processing school meals applications, completing other paperwork required for tracking student participation by their eligibility for free or reduced-price school meals, and collecting school meals fees. When healthy school meals are made available to all students free of charge, school nutrition departments can instead focus those resources on serving nutritious and appealing meals.

Healthy School Meals for All also increases participation in school breakfast and lunch, which allows school nutrition finances to benefit from economies of scale. The average cost to schools for producing breakfast and lunch has been shown to decrease with higher participation, with the impact being more significant for school breakfast.³⁰

CONCLUSION

The pandemic has highlighted the critical role that school meals play in supporting education and health, particularly for children whose households earn low incomes. They will be an important support as the nation recovers from the educational, health, and economic impacts of the pandemic. Offering meals to all students at no charge would ensure that every child in the U.S. has access to the nutritious school breakfast and lunch that can help improve outcomes in food security, academics, and health. Offering meals at no charge also would be a tremendous support to school nutrition programs across the country, reducing administrative work and eliminating the need to focus on collecting unpaid school meals fees. Instead, they would be able to focus on preparing and serving healthy meals to children. Investing in Healthy School Meals for All will help ensure that all children — regardless of income — are ready to learn and thrive.

This brief was prepared by FRAC’s Allyson Pérez, Child Nutrition Policy Analyst, and Crystal FitzSimons, Director of School and Out-of-School Time Programs.

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30 Ollinger, M., & Guthrie, J. (2015). *Economies of Scale, the Lunch-Breakfast Ratio, and the Cost of USDA School Breakfasts and Lunches*. Available at: https://www.ers.usda.gov/webdocs/publications/45438/54356_err-196_summary.pdf?v=6815. Accessed on June 12, 2021.