

Improving Access to Free School Meals: Addressing Intersections Between Universal Free School Meal Approaches and Educational Funding

Healthy Eating
Research

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Key Findings

- Universal free school meals have the potential to improve student nutrition, behavior, and academic performance, and strengthen school finances.
- Schools offering universal free meals are no longer required to collect free and reduced-price meal applications, an important source of data on household income that has traditionally been used to allocate funding to schools.
- To pave the way for more schools to adopt universal free school meal provisions while preserving critical education funding, efforts to disentangle free and reduced-price meal application data from education funding are needed.
- Recommendations to address these intersections include researching and developing alternative measures of poverty and economic well-being to allocate education funding and addressing misconceptions about the impacts of universal free meals on education funding through clear and strong messaging campaigns.



Introduction

The prevalence of poverty and food insecurity (i.e., lack of reliable access to healthy food) among United States (U.S.) households with children has increased dramatically since the beginning of the COVID-19 pandemic—disproportionately impacting communities of color and communities characterized by high poverty levels—and is expected to remain high for the foreseeable future.^{1,2} As the nation grapples with the COVID-19 pandemic and associated economic ramifications, the U.S. Department of Agriculture (USDA) school meal programs continue to play a critically important role in feeding children and adolescents. Prior to the COVID-19 pandemic, school meal programs served 15 million breakfasts and 30 million lunches daily in nearly 100,000 U.S. schools through the USDA National School Lunch Program (NSLP) and School Breakfast Program (SBP).^{3,4} Of these meals, 12.5 million breakfasts (83%) and 22 million lunches (73%) were provided at low or no cost to students due to family need.⁴ Meals served in schools have been shown to be of higher nutritional quality than those brought from home. They have also been shown to decrease food insecurity, improve academic outcomes, and substantially reduce obesity trends among children living in poverty.⁵⁻¹³

Traditionally, student eligibility for free or reduced-price meals (FRPM) is determined annually for each student based on: 1) an application from each student's parent(s)/guardian(s) documenting household income and size; or 2) direct certification, a data matching process through which students are identified as eligible for free meals based on household participation in other federal means-tested programs such as the USDA Supplemental Nutrition Assistance Program (SNAP) or U.S. Department of Health and Human Services Temporary Assistance for Needy Families (TANF). Students are eligible for free meals if their household income is below 130 percent of the federal poverty level and for reduced-price meals if their household income is between 130 percent and 185 percent of the federal poverty level¹² (Table 1). Notably, the data gathered through school meal applications are used for more than just determining eligibility for FRPM; they are also used to determine allocations of several critical federal and state education funding initiatives, such as Title I funding, which are targeted toward students with low household incomes.

In response to pandemic-related school, food systems, and economic disruptions, the USDA was granted Congressional authority to issue nationwide waivers allowing schools to serve universal free meals to all students through June 30, 2022.^{14*} Schools operating under this waiver are not required to collect applications to determine individual students' household eligibility for FRPM. Not collecting FRPM applications is also a feature of the Community Eligibility Provision (CEP), a meal service option that became available nationwide starting in school year (SY) 2014-15 and which allows schools located in high-poverty areas to serve universal free breakfast and lunch.¹⁵

While universal free school meals have been shown to benefit both students and schools, the loss of FRPM application data—commonly used to allocate billions of dollars annually in education funding—has been cited as a key barrier to CEP adoption by school and district administrators.^{16,17} This year, because many schools operating under the COVID-19 waiver to serve universal free meals are similarly not collecting FRPM applications for the first time, confusion about how to allocate education funding to schools without these data has become more widespread. In light of this confusion, this research brief aims to:

1. Provide an overview of universal free school meal approaches.
2. Summarize the intersections between universal free school meal approaches and educational funding.
3. Identify recommendations for policy and practice to address the intersections between school meals and educational funding in order to improve access to school meals.

This research brief is also intended to inform ongoing Child Nutrition Reauthorization (CNR) policy discussions, where CEP expansion and universal school meals will likely be considered.^{18,19}

About Child Nutrition Reauthorization (CNR)

CNR provides Congress with a regular opportunity to examine and reauthorize the operation and effectiveness of the following school-based child nutrition programs, among others, and make changes to each program's statutory structure:^{18,19}

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Summer Food Service Program (SFSP)
- Seamless Summer Option (SSO)
- Child and Adult Care Food Program (CACFP)

Table 1.

Federal school meal reimbursement rates to schools for meals served, School Year 2020-2021

	Federal Reimbursement Rate (i.e., what the government pays)	Student Meal Charge (i.e., what the student pays)
USDA National School Lunch Program (NSLP)^{a, b}		
Free	\$3.51	\$0.00
Reduced-Price	\$3.11	\$0.40
Paid	\$0.33	Varies based on school grade level and locality. In SY 2016-17, on average, \$2.48–2.74
USDA School Breakfast Program (SBP)^c		
Free	\$1.89	\$0.00
Reduced-Price	\$1.59	\$0.30
Paid	\$0.32	Varies based on school grade level and locality. In SY 2016-17, on average, \$1.46–1.55

Sources: Federal reimbursement rates: National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates, 85 FR 44270 (<https://www.fns.usda.gov/cn/fr-072220a>). Student paid meal charges: 2016-2017 survey from the School Nutrition Association (<https://schoolnutrition.org/aboutschoolmeals/schoolmealtrendsstats/>)

a Schools certified as meeting the new nutrition standards receive an additional \$.07 per lunch.

b An additional \$.02 per lunch is provided to schools in which 60 percent or more of the second preceding school year lunches were served free or reduced-price.

c An additional \$0.37 is provided for each free or reduced-price breakfast served in “severe need” schools, where at least 40 percent of the lunches served during the second preceding school year were served free or reduced price.

The most recent CNR is the Healthy, Hunger-Free Kids Act of 2010 (HHFKA, P.L. 111-296).¹⁸ Since HHFKA expired on September 30, 2015, the majority of program operations have been continued with funding provided by appropriations acts. In 2019, Congress announced plans to work on CNR in the 116th Congress (2019-2020), but due to the COVID-19 pandemic, CNR has been delayed until 2021, at the earliest. Passing a CNR is viewed as a potential early milestone for the 117th Congress (2021-2022) and the new Biden Administration.

* The COVID-19 pandemic waiver allows schools to serve universal free meals by operating as open, area-eligible sites through the Seamless Summer Option of the National School Lunch Program or the Summer Food Service Program.

Universal Free School Meals

Since 2014, CEP has been the most common mechanism through which schools have offered universal free meals (other, less frequently used universal free meal provisions and initiatives are described in Appendix A). Schools participating in CEP provide free breakfast and lunch to all students regardless of each individual student’s household income. As **Table 2** illustrates, CEP is an alternative to the traditional USDA reimbursement model that eliminates the need to collect household school meal applications.¹¹ Rather, if 40 percent or more of the students in a school (or group of schools) are directly certified as eligible for free school meals based on existing administrative data, the entire school can opt into

CEP and provide all students free meals. Schools adopting CEP are reimbursed using a formula based on the “identified student percentage” or ISP—the percentage of students directly certified as eligible for free meals.

Authorized as part of HHFKA, CEP was rolled out over three years across 10 states and the District of Columbia before becoming available nationwide to eligible schools in July 2014.²⁰ By SY2019-2020, 30,667 schools had adopted CEP, representing 69 percent of eligible schools²¹ (**Figure 1**). The number of qualifying schools is expected to have increased considerably in SY2020-2021 due to the economic downturn from the COVID-19 pandemic.²²

Table 2.

Comparison of the Community Eligibility Provision and the traditional USDA meal eligibility and reimbursement model

	Traditional USDA Reimbursement Model ^a	Community Eligibility Provision Reimbursement Model
Meal eligibility	<p>Student-level eligibility</p> <p>Based on annual household application^b OR direct certification using existing administrative data^c</p>	<p>School-level eligibility</p> <p>Based on percentage of students “identified” as eligible for free meals through direct certification using existing administrative data^c</p> <p>Identified student percentage (i.e., percentage of students identified as eligible for free meals through direct certification; ISP) must be ≥ 40 percent</p>
Meal pricing	<p>Students offered free, reduced-price or free meals depending on household income</p> <ul style="list-style-type: none"> ■ Free meal eligibility; household income < 130 percent federal poverty level ■ Reduced-price meal eligibility; household income 130-185 percent federal poverty level ■ Paid meal eligibility; household income > 185 percent federal poverty level 	<p>All students offered free meals</p>
School meal reimbursement	<p>Schools are reimbursed by the USDA based on the number of meals served to each category of student (free, reduced-price, paid), with rates differing by geographical location of the school (contiguous versus noncontiguous U.S. states and territories)</p>	<p>Schools are reimbursed by the USDA based on the number of meals served and the ISP</p> <p>ISP x 1.6 = percent of meals served reimbursed at the highest “free meal” rate. The remaining percent of meals served are reimbursed at the lower “paid meal” rate</p> <p>Example: ISP of 50 percent</p> <ul style="list-style-type: none"> ■ 50 percent x 1.6 = 80 percent meals reimbursed at “free” rate ■ Remaining 20 percent reimbursed at “paid” rate <p>Schools with ISPs ≥ 62.5 percent, 100 percent of meals served are reimbursed at the “free” rate</p>

a In response to the COVID-19 pandemic, the USDA has approved state plans to serve universal free meals to students through the Seamless Summer Option or the Summer Food Service Program without collecting free or reduced-price meal applications.

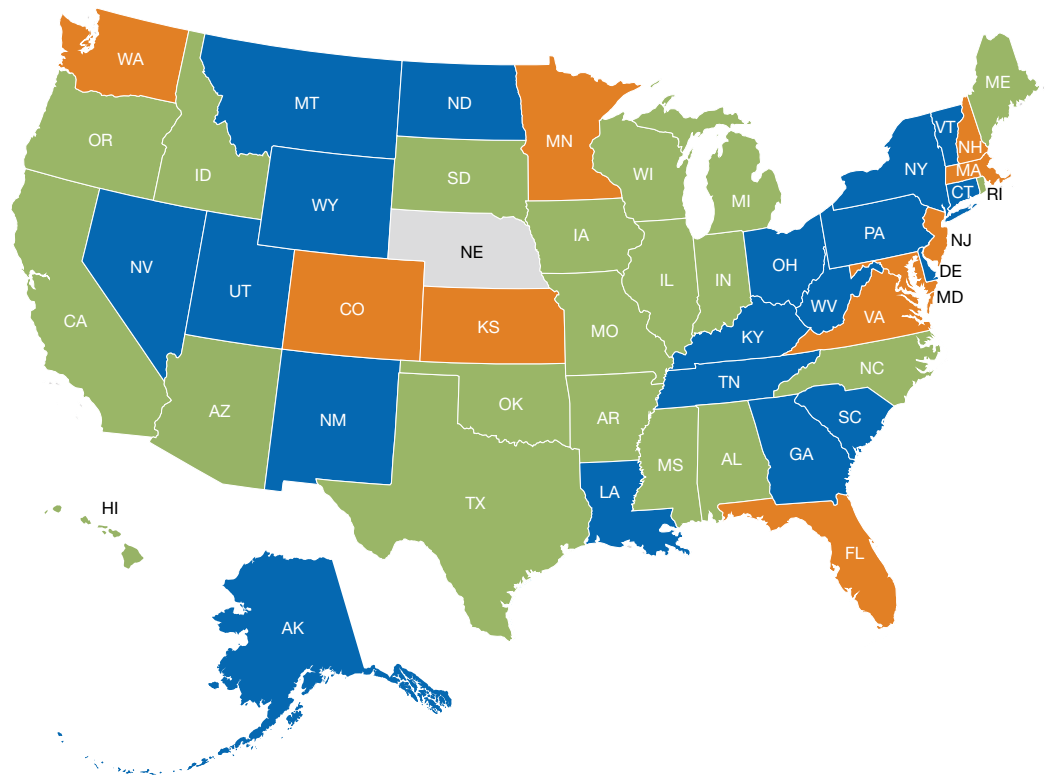
b Free and reduced-price meal household applications include information on household income and size.

c States use an electronic data matching process to directly certify students as eligible for free meals based on household participation in other means-tested assistance programs: Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, Food Distribution Program on Indian Reservations, Medicaid, Head Start. Students are also directly certified as eligible for free meals if they are experiencing homelessness, in the foster care system, or are migrants. The administrative data sources used to directly certify students for free meals differ by state. Nineteen states currently participate in the Medicaid direct certification demonstration program through which they are authorized to use Medicaid data to certify students.

Figure 1.
Percentage of eligible schools
adopting the Community Eligibility
Provision in School Year 2019–2020.

- 0–24%
- 25–49%
- 50–74%
- 75–100%

Source: Food Research & Action Center. Community Eligibility: The Key to Hunger-Free Schools School Year 2019–2020. May 2020. <https://frac.org/wp-content/uploads/CEP-Report-2020.pdf>



Universal Free Meal Provision During COVID-19

As noted earlier, due to the COVID-19 pandemic, USDA has authorized schools to provide universal free meals through June 30, 2022.¹⁴ Sites operating under this waiver may provide free meals to all students regardless of household income and are not required to collect FRPM applications. Additionally, Congress authorized the USDA to approve state plans to administer Pandemic Electronic Benefits Transfer (P-EBT), which provides monetary benefits to households with students who have lost access to free or reduced-price school meals due to COVID-19. Students at schools participating in CEP were automatically identified as eligible to receive P-EBT.²³

Impact and Implementation of Universal Free Meals

Emerging evidence suggests that universal free meals may lead to positive outcomes related to student nutrition, behavior, and academic performance. Two recent reviews of universal free meal programs found:^{16,24}

- Strong evidence of increased meal participation rates.
- Mixed evidence of impacts on test scores and attendance.
- Limited but promising evidence of improvements in weight outcomes, on-time grade promotion rates, disciplinary referrals, and food security.

Food service staff at CEP schools in Maryland also shared how they believe the program helps:¹⁷

- Reduce student stigma.
- Decrease financial stress among parents.
- Improve morale among school food service staff.

Universal free meal programs may also strengthen school food service finances by improving economies of scale and reducing administrative burden for schools, eliminating the need to process meal applications and meal charges. For example, districts participating in CEP in New York reduced their school food program deficits by \$14 per student each year through increased federal reimbursement and reduced per meal production expenditures.²⁵ A recent national analysis found that schools participating in universal free meal programs reduced their per-meal costs while maintaining the nutritional quality of meals served.²⁶

Despite evidence of potential benefits of CEP, nearly one-third of eligible schools were not participating in SY2019–2020.²¹ A 2014 USDA report explored barriers to adoption among schools in states participating in the initial three year CEP phase-in period.²⁷ One of the leading barriers to implementation among eligible schools was concern about potential financial implications of CEP for meal reimbursement and for education funding traditionally allocated based on FRPM data.

While the USDA and anti-hunger advocates have since worked to provide guidance to eligible schools about the potential financial impacts of CEP,^{28,29} a recent study of food service staff in Maryland found that concerns regarding potential loss of education funding remained a key barrier to adoption.¹⁷

Intersection of Universal Free Meal Programs and Education Funding

In the years since CEP became available, a growing number of schools have ceased collecting FRPM applications. This is because schools operating under CEP—approximately 30,000, or a quarter of all U.S. public schools—are not required to collect FRPM applications. Now, due to the COVID-19 pandemic waiver that allows all schools to serve universal

free meals through June 30, 2022, even fewer schools are collecting these applications.¹⁴ Policymakers and district and school administrators have raised concerns regarding the loss of household income data previously collected through FRPM applications—data that have traditionally been used to allocate funding to schools, as well as to identify students and teachers eligible for grant programs and discounted services. Examples of federal, state, tribal, and grant funding programs that have historically used FRPM data as the basis for allocation of funding are listed in **Table 3**. FRPM data are also used by states and districts to meet accountability and reporting requirements under the federal Every Student Succeeds Act (P.L. 114-95). For example, districts use individual student-level data to report academic achievement by school and grade level separately by economic disadvantage.

Table 3.

Examples of school funding programs that have traditionally allocated funds based on school and household-level poverty data collected through FRPM applications

Funding Source	Description
Title I of the Elementary and Secondary Education Act of 1965 (Title I)	The largest federal program supporting public elementary and secondary schools, Title I provides funds to schools with a high proportion of students from households with low incomes. Funds can be used to support a wide range of activities, including promoting effective instruction for at-risk students, encouraging parental participation, or coordinating with health and social services agencies. More than half of U.S. public schools receive Title I funding. ³³ In 2019, funding nationwide totaled \$15.9 billion. ³⁴
State foundation and compensatory education funding	Formulas for funding K-12 education vary by state. In many states, the formulas to allocate foundation (or base) funding to schools weigh, as one factor, the proportion of students who are FRPM eligible. ^{35,36} Some states also earmark compensatory education funding for schools that serve a high proportion of students in economically disadvantaged families. For example, in Maryland, in 2019, compensatory education funding for high-poverty schools totaled \$1.3 billion. ³⁷
District resource allocation	Some districts use weighted student funding (also known as student-based budgeting or fair student funding) to assign more funds to schools serving a higher proportion of economically disadvantaged students. ³⁸ Additionally, some districts set staffing ratios and class size limits based on school-level economic disadvantage, ensuring that higher-poverty schools have greater levels of staffing. ³⁹
Teacher loan forgiveness and cancellation programs	Federal- and state-sponsored teacher loan forgiveness and cancellation programs are available for teachers working at high poverty schools (defined as a school that receives Title I or where 30 percent or more of students qualify for services under Title I). ⁴⁰ For example, the federal Teacher Loan Forgiveness Program forgives up to \$17,500 per teacher after completion of five consecutive years of teaching at a high-poverty school.
Registration fees for student standardized tests (e.g., SAT, ACT, AP)	Students who are FRPM eligible may receive waivers for most standardized testing fees (typically between \$50 and \$100 per test ⁴¹).
Household wireless internet discounts*	Many internet service providers offer free or discounted services to households with students who are FRPM eligible.

* The Universal Service Program for Schools and Libraries (E-Rate) also provides high-poverty schools and libraries discounts for telecommunications, internet access, internal connections, basic maintenance of internal connections, and managed internal broadband services. In 2014, the Federal Communications Commission issued guidance specifying how districts with CEP schools should calculate their discount rates.

Critically, while concern among school and district administrators about potential changes in education funding have been cited as a key barrier to universal free meal adoption, most of these concerns are due to unclear messaging and do not reflect the current reality. Take, for example, Title I. Title I funds are allocated to states and school districts based on county-level U.S. Census data. Therefore, FRPM data do not impact the amount of funding a state or district receives. However, FRPM data are often used within a school district to allocate Title I funds to individual schools.²⁸ As such, allocation of Title I funds to states and districts is not affected by CEP adoption, but Title I allocation *within* districts can be affected by CEP adoption. Anecdotal reports suggest that CEP adoption has led to changes in Title I allocation to schools within some districts.³⁰ Districts, however, under federal law, may use alternative measures of poverty to allocate Title I funds, such as ISP, federal social assistance participation (e.g., Medicaid or TANF), or U.S. Census data.²⁸

Additionally, in response to the growing number of schools adopting CEP, many states have modified their policies for allocating education funding. For example, Maryland passed the Hunger-Free Schools Act of 2015 (HB 965), which guaranteed a minimum state compensatory education funding rate for CEP schools.³¹ Similarly, private organizations such as the College Board, which administers the SAT and previously required proof of FRPM eligibility to provide free or discounted benefits to students from families with low incomes, have revised their student-level eligibility requirements. The College Board now grants benefits to students who can demonstrate eligibility based on direct certification status or application documenting household income.³² Many internet providers also now offer discounted wireless services to any student enrolled in a CEP school.

To maintain current family income data, some schools operating under the universal free meal COVID-19 pandemic waiver have attempted to collect FRPM applications but have faced logistical challenges collecting complete or reliable information.⁴² There are several reasons schools may face difficulty collecting these applications, including the challenges of remote learning, which constrains traditional reminder methods, and because guardians of FRPM-eligible students may have less incentive to complete the applications or provide accurate information because completion of the application does not directly affect their child's ability to receive school meals. As such, non-CEP districts currently operating under the COVID-19 pandemic waiver may experience similar issues allocating educational funds as CEP schools have in recent years. For example, districts will have to decide how to equitably distribute Title I funding to schools within their districts without FRPM data.

In recognition of this challenge, in January 2021, the U.S. Department of Education issued guidance to districts regarding the allocation of Title I and related federal education funds in the absence of FRPM data.⁴³ The guidance recommended that districts allocate funds based on:

1. Poverty data other than FRPM data (e.g., Medicaid or TANF participation, or a composite measure).
2. The best available FRPM data, which might be from SY2019-2020.
3. FRPM-related data from SY2020-2021 that may be accessible (e.g., ISP).
4. Data from a poverty survey conducted by the district that replicate FRPM, Medicaid, or TANF data (i.e., alternative income forms).

Under this guidance, schools are also required to conduct direct certification matching using SNAP data for SY2020-2021. While these options provide districts the flexibility to make decisions using the best data they have, it is unlikely that any of these data sources will completely reflect recent shifts in poverty and need due to the pandemic and economic recession.

Recommendations for Addressing Intersections Between Universal Free School Meal Approaches and Educational Funding

Given that the nation is likely to be grappling with social and economic ramifications of the COVID-19 pandemic long beyond the end of the current school year (SY2020-2021), and emerging evidence of the benefits of universal free meals for student health, academic performance, and behavior, there is a growing push for free meals to become universally available. One strategy would be through the creation of a national universal free school meal program that provides free meals to all students regardless of household income.⁴⁴ Another strategy, although less comprehensive, is through more widespread adoption of CEP. If the more than 44,000 schools eligible for CEP in SY2019-2020 adopted CEP, this would represent 44 percent of the country's 100,000 public schools.²¹ To pave the way for both of these strategies while preserving critical education funding, efforts to disentangle FRPM data from education funding are needed. Swift implementation of the following recommendations may also benefit non-CEP schools currently serving universal free meals under the universal free meal COVID-19 pandemic waiver.

Employ alternative measures of poverty to allocate education funding. While the recent shift toward universal free meals has cast a spotlight on the need for alternative approaches to measuring poverty, researchers, advocates, administrators, and policymakers have for many years raised

To pave the way for both of these strategies while preserving critical education funding, efforts to disentangle FRPM data from education funding are needed.

concerns that the traditional model of certifying students for school meals through FRPM applications is flawed.^{45,46} This is, in part, because some eligible students do not complete school meal applications due to stigma, limited language proficiency or literacy, and concerns about immigration documentation status.^{47,48} Further, many students living in food-insecure households have household incomes above 185 percent the federal poverty level and therefore are not eligible for school meal assistance. In fact, 10-15 percent of food insecure students do not qualify for FRPM based on household income.⁴⁹ Additionally, FRPM applications may not capture families who move in and out of poverty. Government agencies and other funders should establish alternate measures of poverty to use in place of FRPM application data.

One of the lowest-cost and most commonly employed alternatives is ISP (i.e., proportion of students in a school who are directly certified as eligible for free meals). Using ISP alone as a proxy for poverty, however, raises equity concerns. ISP is calculated based on the percentage of students in a school participating in federal public benefit programs—programs that immigrant families are less likely to qualify or apply for—and, as such, ISP may underestimate need in schools with a high proportion of immigrant families. Two strategies to alleviate equity concerns are to:

- **Improve state direct certification processes.** In SY2016-17, states failed to directly certify, on average, 8 percent of students directly eligible for free meals. Direct certification systems could be improved with increased state and federal funding, including through resumption of the federal Direct Certification Improvement Grant program, which, between 2009 and 2018, provided funds to states to improve their direct certification systems; the program was suspended in 2018 due to lack of funding.⁵⁰
- **Include additional measures of poverty in direct certification.** To better identify students eligible for free meals, states should also directly certify students from households that receive benefits through other means-tested programs such as Supplemental Security Income, Guardianship Assistance, Adoption Assistance, and the Low Income Home Energy Assistance Program. Additionally, 19 states have been granted waivers to use income data available in Medicaid administrative records for direct certification; this authority should be extended to all states. In states that were authorized to use Medicaid data as part of the Direct Certification with Medicaid for Free and Reduced-Price Meals Demonstration Program, direct certification rates increased significantly;

in the four states new to the program in 2016, students directly certified for free meals increased between 2.5 and 8.0 percentage points in the first year.⁵¹ Because Medicaid eligibility requirements are less restrictive than SNAP for non-citizens, more immigrant families participate in Medicaid and would be counted in the ISP measure if Medicaid data were used for direct certification nationwide.

- **Provide flexibility for states and districts to develop a composite measure of poverty that better reflects poverty based on the local context.** States and districts could be permitted to create a composite measure that weights ISP along with other existing measures correlated with poverty (e.g., Medicaid participation, proportion of students who are migrants or English-language learners). For example, Baltimore City Public Schools, which opted into CEP districtwide in 2015, created a composite metric that includes ISP and the percent of students who are English-language learners.⁵² Texas allocates school funding based on a composite measure that includes median household income, average parental educational attainment, percentage of single-parent households, and home ownership rate.⁵³

Strengthen and clarify messaging about CEP’s potential impact on education funding. Misinformation about how CEP or a national universal free meal program may impact school and district finances—especially concerns about negative effects on Title I and compensatory education funding—is common. In previous qualitative work, district administrators identified representatives of state education agencies and administrators from neighboring districts as trusted messengers about school meal funding.¹⁷ To facilitate CEP adoption, these local messengers can serve a crucial role in disseminating information from the USDA, anti-hunger advocates, and others to educate CEP-eligible schools about the financial implications of adoption in their state.

Support research on alternative measures of poverty and economic well-being. More research is needed to investigate alternative measures of poverty and student economic well-being that are valid and pose minimal administrative burden on states and districts. To support this work, a joint task force could be established with representatives from the U.S. Department of Education, USDA, state-level agencies that administer child nutrition programs (i.e., education, health, and agriculture), and other external stakeholders. Congressional hearings and an investigation led by the Government Accountability Office may also provide valuable insight into potential strategies to address this complex issue.

Conclusion

Throughout the COVID-19 pandemic, school meal programs have played a vital role in meeting the nutritional needs of students and families and addressing the food insecurity crisis. Considering that the economic ramifications of the COVID-19 pandemic are likely to be felt for many years to come, widespread adoption of universal free meals, either through increased school-level uptake of CEP, or through a new national universal free meal policy, will be critical to ensure that students continue to have reliable access to nutritious school meals. Currently, widespread use of FRPM application data to establish education funding is a key barrier to uptake of universal free meals. Disentangling FRPM application data from education funding will not only benefit schools considering adoption of CEP and pave the way for a national universal free meal policy but may also protect the financial health and stability of schools currently operating under the universal free meal waiver during the COVID-19 pandemic. Changes to current policy and practice related to allocation of education funding are essential to meet the nutritional needs of millions of students while maintaining vital educational funding. By doing so, real or perceived tradeoffs will not need to be made between addressing child hunger and promoting educational attainment.

Glossary

CACFP	USDA Child and Adult Care Food Program
CNR	Child Nutrition Reauthorization; congressional reauthorization of the federal child nutrition programs
CEP	Community Eligibility Provision; a provision of the USDA National School Lunch and School Breakfast Programs that allows high-poverty schools to serve universal free meals
FRPM	Free and reduced-price meals; students qualify based on household income and size
ISP	Identified student percentage; percentage of students in a school who are directly certified as eligible for free meals using existing administrative data
NSLP	USDA National School Lunch Program
P-EBT	USDA Pandemic Electronic Benefits Transfer; monetary benefits to households with students who have lost access to free or reduced-price school meals due to COVID-19
SBP	USDA School Breakfast Program
SFSP	USDA Summer Food Service Program
SNAP	USDA Supplemental Nutrition Assistance Program
SSO	USDA Seamless Summer Option of the National School Lunch Program
SY	School year
TANF	U.S. Department of Health and Human Services Temporary Assistance for Needy Families
Title I	Title I of the Elementary and Secondary Education Act of 1965; federal funding to schools with high proportion of children from families with low incomes
USDA	United States Department of Agriculture

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The views expressed in this paper by Drs. Hecht, Dunn, Fleischhacker and Bleich, who have all recently transitioned to federal service, are solely the personal views of those authors.

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Appendix A: Other Universal Free Meal Provisions and Initiatives

Provisions 1, 2 and 3

There are three other school meal options that provide an alternative to the traditional reimbursement model and—like the Community Eligibility Provision (CEP)—aim to reduce the need for schools to collect school meal applications annually. Provisions 1 and 2 became available in 1980 and Provision 3 became available in 1995.⁵⁴ Provision 1 allows schools to certify students for free meals for two years rather than one; however, Provision 1 schools do not serve universal free meals. For a school to participate in Provision 1, at least 80 percent of enrolled students must be eligible for FRPM. While schools are not required to meet a minimum threshold of FRPM-eligible students to participate in Provisions 2 or 3, advocates suggest that in order to break even financially, schools may need a high proportion—around 75 percent—of FRPM-eligible students.⁵⁵ Under Provisions 2 and 3, schools collect school meal applications every four years and serve universal free meals for the next four years. Meal reimbursement is established in the base year based on claiming percentages (Provision 2) or level of federal cash and commodity assistance, adjusted to reflect changes in enrollment and inflation (Provision 3). While Provision 2 is the most commonly used among these three provisions, overall uptake was low prior to CEP, and many schools have since switched to CEP.

Additional smaller-scale universal free meal initiatives have been implemented in US cities and states. For example, West Virginia implemented a statewide pilot during SY2011-2012.⁵⁶

Summer Meal Program Sites

The USDA Summer Meals Programs, which includes the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO), provides funding to sponsors, such as schools, nonprofit organizations (e.g., faith-based organizations, summer camps), and local government agencies, to serve meals during summer or other extended school vacations at sites that provide educational or enrichment activities.⁵⁷ On a typical day in July 2019, 2.8 million children received a meal through the USDA Summer Meals Program.⁵⁸ Summer meal sites may be closed (or “enrolled”) sites or open (or “area”) sites. At closed sites, meals are provided only to children who are enrolled in a program at the site and at least half of children enrolled in the program must be certified as eligible for FRPM based on a household application. Open sites provide free meals to any child, without requiring registration or program enrollment. Open sites must be located in an area that draws attendance from a school in which at least half of children are FRPM eligible or where U.S. Census data shows that at least 50 percent of children in the area have a household income at or below 185 percent of the federal poverty level.

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About Healthy Eating Research

Healthy Eating Research (HER) is a national program of the Robert Wood Johnson Foundation. Technical assistance and direction are provided by Duke University under the direction of Mary Story PhD, RD, program director, and Megan Lott, MPH, RDN, deputy director. HER supports research to identify, analyze, and evaluate environmental and policy strategies that can promote healthy eating among children and prevent childhood obesity. Special emphasis is given to research projects that benefit children and adolescents and their families, especially among lower-income and racial and ethnic minority population groups that are at highest risk for poor health and well-being and nutrition related health disparities. For more information, visit www.healthyeatingresearch.org or follow HER on Twitter at [@HERResearch](https://twitter.com/HERResearch).

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