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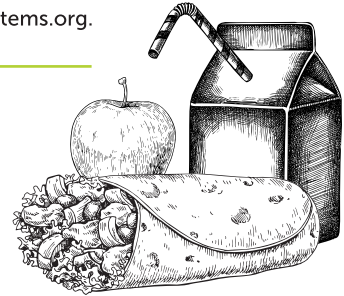
THE VALUE OF UNIVERSAL SCHOOL MEALS

FOR COLORADO K12 STUDENTS & SCHOOLS

This issue brief and full report are available at www.cofoodsystems.org.

PURPOSE

The traditional funding model for school meals creates significant barriers for many students to access healthy meals and too often propagates harmful impacts from stigma¹ and lunch shaming². The traditional funding model also fails to provide: (1) adequate funding for school nutrition departments and (2) support for deeply integrating high-quality, locally grown products and culturally relevant foods into school menus. The USDA’s Community Eligibility Provision (CEP) is a slightly more preferable model for school meal provision, but is not currently available for all schools and, where available, still falls short of fully addressing the school meal funding and quality limitations inherent in the traditional funding model. By way of example, CEP currently only reaches about 19% of schools for lunch and 29% for breakfast³. A more robust funding structure for universal school meal provision is therefore needed to address the inadequacies of both traditional and CEP funding models for school meals. This Issue Brief highlights the value proposition of universal school meals for Colorado K12 students and schools as informed by a literature review and series of interviews about Colorado schools’ experiences during COVID-19.



The USDA defines “stigma” as the perception that school meals only serve low-income children.

The USDA defines “lunch shaming” as any practice that embarrasses children who are unable to pay for a meal”



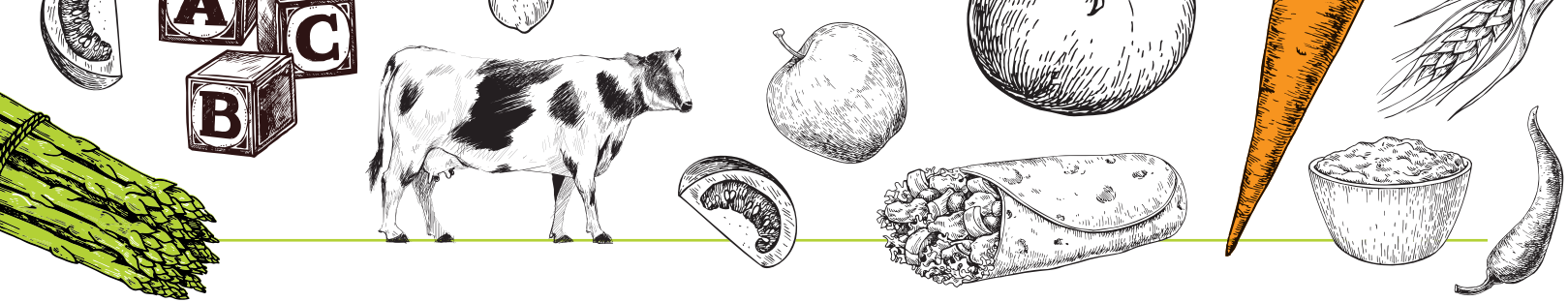
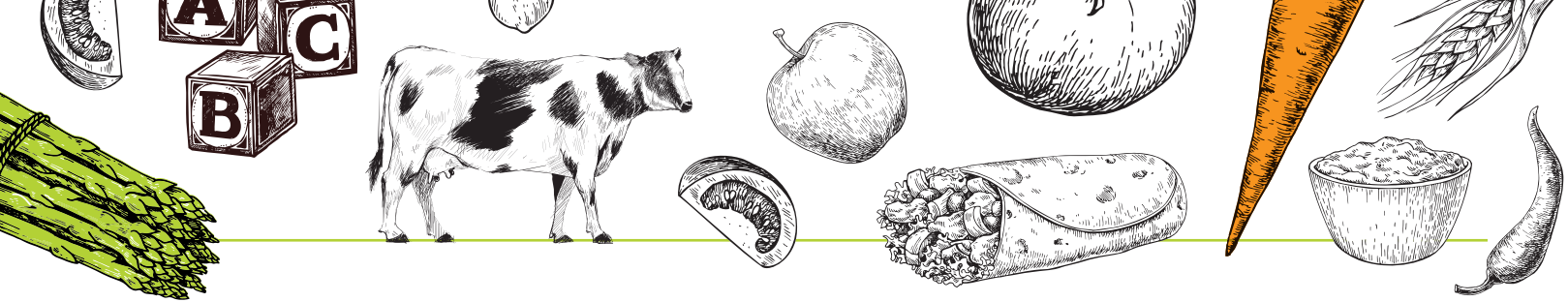


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DEFINING UNIVERSAL SCHOOL MEALS

For the purpose of this issue brief, universal school meals includes breakfasts and lunches at K12 schools offered in-person and during school hours. Compared to the current National School Lunch Program (NSLP) and School Breakfast Program (SBP), universal school meals would offer free breakfast and lunch to all students. Universal school meals would eliminate student meal debt, end lunch shaming, and help to reduce stigma associated with school meals.

While other important issues warrant further exploration, for the purposes of this Issue Brief we have excluded: a detailed examination of summer and other school feeding programs including dinners; weekend meals and afterschool snacks supported by the Child and Adult Care Food Program (CACFP); an assessment of meal options for students under 5 and post-K12 students, including college students; and a deep exploration of farm to school programs. We also recognize that many Colorado school districts are only operating with 4-day school weeks and some are fully online (or hybrid), which can lead to unique operating challenges that are beyond the scope of this Issue Brief. It is also important to note that federal debates are ongoing regarding possible changes to student meal programs via legislation to help with COVID-19 recovery (e.g., The American Families Plan⁴) and/or Child Nutrition Reauthorization Act⁵, which may provide pathways to universal school meals by expanding CEP or creating an alternate universal school meal model.

UNIVERSAL SCHOOL MEALS UNDER COVID

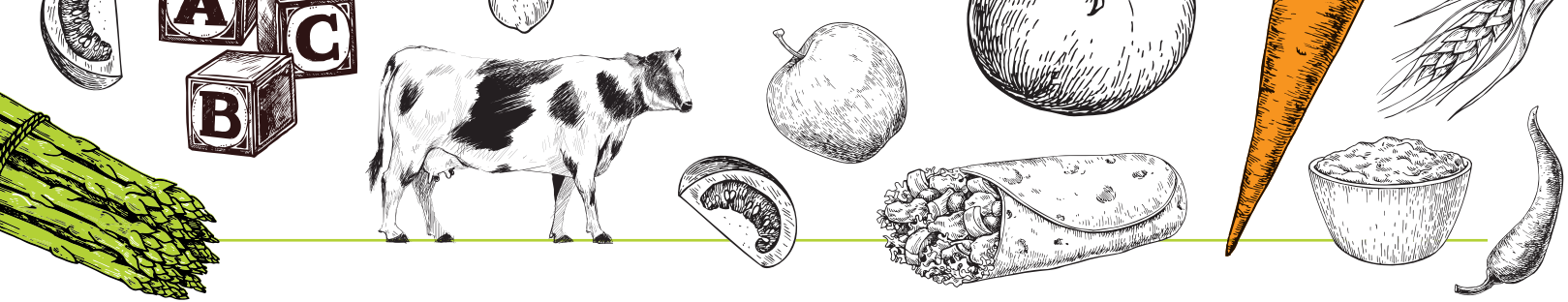
This issue brief is particularly timely given the impacts of COVID-19 on schools and school meal service during the 2019-20 and 2020-21 school years. Preliminary data from the Kids Count in Colorado report⁶ reveals that on average, 10 percent of Colorado's households with children during

the months of the pandemic reported not having enough food to eat in their homes in the past week, an increase from an average of 7 percent who reported they sometimes or often did not have enough food prior to the pandemic. Nationally, 14 percent of households with children reported past week food insecurity, up from 12 percent who indicated they were already experiencing food insecurity before the pandemic.⁷

Overall the importance of school meals as a source of nutritional security for students and their families has never been clearer. In response to COVID-19, the federal government recognized the importance of school meals and issued a wide range of waivers to relax the traditional administrative and operational rules for school meal programs. The waivers administered during the COVID-19 pandemic also increased reimbursement rates up to a maximum of \$2.3750 for each breakfast served and \$4.1525 for each lunch served in schools where meals are prepared where they are served and in rural sites.⁸ These reimbursement rates were 5.1% and 15.3% higher than the previous free meal rate in severe need schools for breakfast (\$2.26) and lunch (\$3.60), respectively (schools that served over 40% or more free and reduced-price lunches during the prior school year are qualified for higher, severe need reimbursement rates)⁹.

All in all, these waivers effectively created a natural experiment for universal school meals, particularly for schools that remained in-person, and recent decisions by the USDA will further extend this opportunity through the 2021-22 school year.¹⁰ To supplement the literature review on the possible impacts of universal school meals, we include quotes from a series of interviews about Colorado schools' experiences during COVID-19.





THE IMPACTS OF UNIVERSAL SCHOOL MEALS ON K12 STUDENTS

Evidence from the literature review and Colorado case studies suggest that universal school meals would likely benefit K12 students by:

- increasing participation in school meal programs
- reducing school meal stigma;
- improving student achievement;
- bolstering student health and wellbeing;
- improving racial equity and justice;
- eliminating school lunch shaming;
- and strengthening nutritional security for students and their families.

INCREASE PARTICIPATION IN SCHOOL MEAL PROGRAMS

Nationwide, 30 million students receive school lunch each day under the NSLP and 15 million students receive breakfast under the SBP¹¹. In the school year 2019-2020, Colorado was home to about 913,233 students of which about 40% or 371,804 were eligible for free or reduced cost lunch (FRL),

"We are serving a lot more breakfast now because it's free. Participation doubled during COVID" - CO school nutrition director

across 1,927 schools¹². Research consistently shows that universal school meals would help maximize the potential reach of meal programs by increasing participation^{13,14}. In Colorado, universal school meals would help reach all 913,233 students, an increase of 541,419 from current FRL programs¹⁵. The USDA meal waivers have made this apparent - a Colorado school nutrition director noted, "We are serving a lot more breakfast now because it's

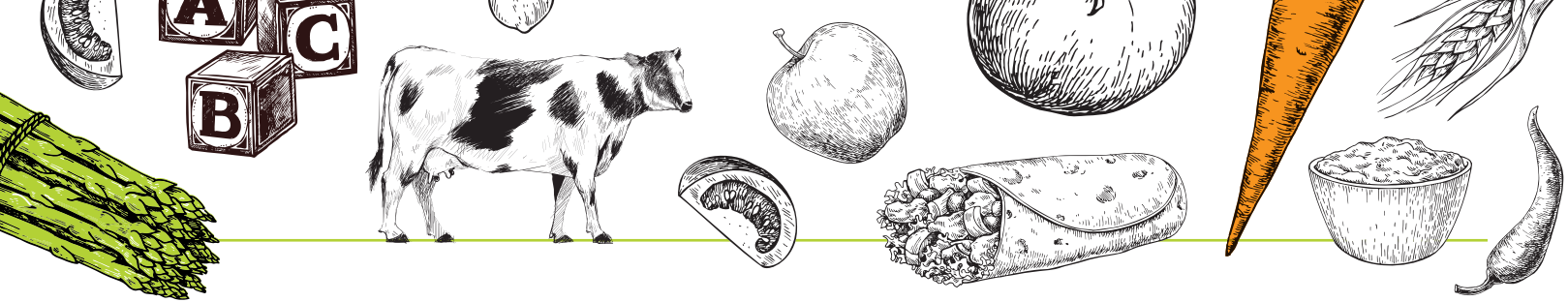
free. Participation doubled during COVID." CEP also provides strong evidence that student participation increases when meals are provided at no cost^{16,17} and that gains are largest among students who previously did not qualify for free or reduced-price meals^{18,19}. In New York City, for example, a switch to universally provided school breakfast led to a 35% and 20% increase in meal participation among full- and reduced-price student groups, respectively, along with a 5% increase in participation among free-meal eligible students.²⁰ Similarly, in Maryland and Pennsylvania, researchers found school CEP participation correlated with increased total and paid school lunch participation, compared to lunch participation rates in CEP-eligible but non-participating schools.²¹ Conversely, increased school meal prices are correlated with decreased meal participation²².

The logistics of school meal program execution are also influential in participation rates. Universal meal program participation is highest when meal provision, especially breakfast, is integrated into the school day^{23,24,25,26}. For example, Maryland school districts found that student participation in their free breakfast program rose significantly when meals were served in the classroom rather than in the cafeteria. These higher participation rates were realized as food provision was integrated with the students' schedule, normalizing participation and reducing related stigma.²⁷ Strategies like breakfast in the classroom are significantly more feasible in a CEP/Universal meal setting due to reduced administrative burden for both teachers and nutrition staff.

REDUCE SCHOOL MEAL STIGMA

Stigma around school meals comes from a misperception that school meals are only for low-income students.²⁸ Stigma primarily arises from the ways that students treat each other and the negative social pressure some students feel about being a free meal kid. While school meal stigma is present in schools with very high numbers of free-meal-eligible students, it appears even more





acutely in schools with a smaller percentage of free meal-eligible students.²⁹ Research reveals that even if free lunch eligibility rises within a high school by 10%, it is correlated with only a 1.8% increase in school meal program participation.³⁰ Additionally, the availability of fast-food restaurants, grocery stores and convenience stores has a dampening effect on high school student participation in school meal programs,³¹ revealing that stigma has a very real, negative impact on school meal participation rates. Other research documents that as much as 18.5% of high schoolers choose not to eat school meals simply because their friends do not either.³² Similarly, parents of students who are eligible for free or reduced-price meals cite stigma as the reason they choose not to apply for the

"We are feeding all kids-- this is a big deal. It's just one less stress for parents and kids, and there's no stigma related to a 'government handout' because everyone was eating the same meal. There wasn't stigma - just everybody eats free." - CO school nutrition director

program^{33,34}. Additionally, evidence suggests that school meal stigma grows as students age, with higher prevalence among middle and high school students.³⁵ Universal school meals are the most effective approach to comprehensively reducing or eliminating school meal stigma, as meals would no longer reflect household income or ability to pay. A Colorado school nutrition director noted that, with the waivers, "We are feeding all kids - it's a big deal. It's just one less stress for parents and kids, and there's no stigma related to a 'government handout' because everyone was eating the same meal. There wasn't stigma - just, everybody eats free."

IMPROVE STUDENT ACHIEVEMENT

Universal school meal programs are consistently correlated with higher academic scores, particularly

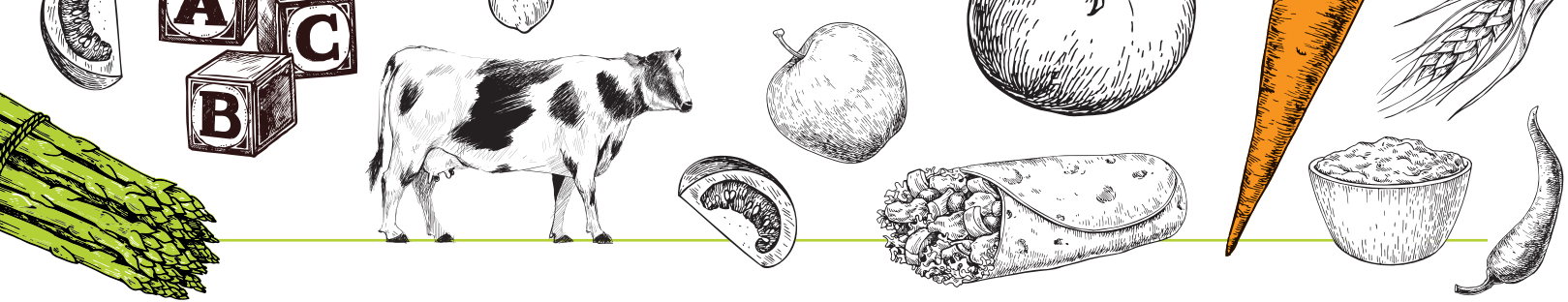
in mathematics.^{36,37} The regular consumption of a healthy breakfast stands out as essential for improved academic achievement.^{38,39,40,41,42} Students who eat breakfast score higher in terms of memory and attention throughout the day, than their peers who do not eat breakfast.⁴³ Students who regularly eat breakfast also demonstrate improved concentration in the classroom and higher average test scores.^{44,45,46,47,48} Predictable breakfast accessibility is also strongly tied with racial equity and justice concerns, as urban youth of color have disproportionately higher rates of going without breakfast, frequently due to limited economic resources related to neighborhood food insecurity.⁴⁹ Conversely, deficits in food and nutrition access are linked to learning gaps,⁵⁰ lower grades, and increased rates of repeating a grade.⁵¹ Overall, universal school meal programs appear likely to advance a student's success across a range of important indicators, such as increased math and reading scores by as much as 10-15% of standard deviation on average.^{52,53,54}

BOLSTER STUDENT HEALTH AND WELLBEING

Poor diet and nutrient deficiencies are linked to a range of mental, behavioral, and physical health problems for students.^{55,56,57} Student participation in school meals is linked with reduced rates of obesity and poor health by 21% and 33% respectively.⁵⁸ Additionally, school meal participation is correlated with lower student BMI,⁵⁹ and studies have found that universal school meal programs either have a neutral or beneficial effect on student BMI.⁶⁰ Participation in school breakfast meal programs is particularly associated with lower BMI, a healthy weight trajectory and a lower probability of being overweight or obese.^{61,62}

While more research is needed to track longitudinal health outcomes across socioeconomic status, universal school meals appears strongly associated with improved physical and mental health, as well as reduced occurrences of behavioral and/or developmental difficulties and diet-related chronic diseases.





IMPROVE EQUITY FOR BIPOC (BLACK, INDIGENOUS, AND PEOPLE OF COLOR) STUDENTS

Universal school meals would also promote equity by addressing the barriers students and families of color and lower economic means face when seeking food. Overcoming systemic inequities in school meal accessibility is a vitally important step towards ensuring all students can obtain the food and nutrition they need to thrive. Racial inequity has been a constant predictor of food insecurity in the US, even when controlling for wealth. Specifically, Hispanic and Black households have been twice as likely to experience food insecurity than White households. Other studies have shown that, between 2000 and 2010, one in four American Indian/Alaska Native (AI/AN) families were consistently food insecure and at a rate twice as high as their white counterparts.⁶³

Systemic racial and ethnic discrimination permeate across all layers of society to create racial disparities in food insecurity.⁶⁴ Large disparities in wages and household wealth exist along racial divides, even when controlling for education level.⁶⁵ A 2018 study by Drexel University found that the median family wealth for Latinx families was \$20,700 and \$17,600 for Black families, compared to \$171,000 for White families.⁶⁶ People of color are more likely to have difficulty getting a housing loan, or, if they can obtain a housing loan, are much more likely to be victims of subprime loans.⁶⁷ Additionally, as students, Blacks and people of color have much higher rates of disciplinary action by school administrators, and as adults, they comprise over 50% of the prison population, while constituting just 32% of the U.S. population.⁶⁸ Blacks are imprisoned at 6 times the rate of Whites for similar offences.⁶⁹ As incarceration of a parent is correlated with increased risk of food insecurity among children, non-White children are more often at risk of food insecurity due to racial disparities in U.S. incarceration rates.⁷⁰ Additionally, a record of imprisonment creates barriers to employment and stable, safe housing.⁷¹ Thus, economic hardship and food insecurity is incredibly

common for previously incarcerated individuals and their families, who are much more likely to be non-White.⁷²

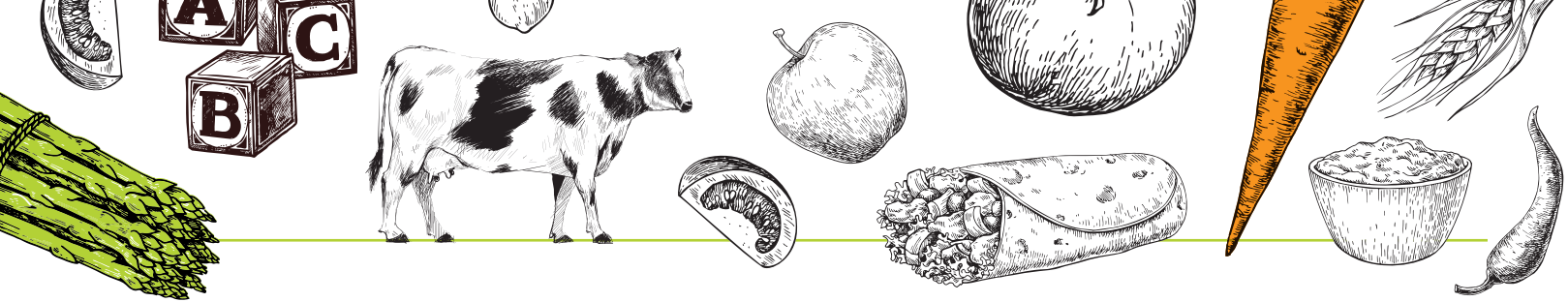
Additionally, the COVID-19 pandemic has exacerbated the prevalence of food insecurity as a whole and disproportionately for non-white families. In 2019, more than 35 million people, including 11 million children, were food insecure in the US. Within this figure, just 8.1% of White children lived in a food insecure household, compared to 15.8% of Latino, 19.3% Black, and 23.5% of Native American children. In 2020, the percentage of Black families experiencing food insecurity rose to 21.6%, compared to a slight increase of food insecurity of white families to 12.3%. The speed of economic recovery from COVID-19 is also anticipated to differ by race. For example, the food insecurity rate for people who are Black is projected to remain unchanged in 2021, while that for people who are White is projected to decline to 11.1%.⁷³ Early evidence in Colorado suggests a similar trend in the rate of food insecurity - increasing from about 10%⁷⁴ to an estimated 38%⁷⁵ (a 267% increase) with 52% of Non-White/Latinx Coloradans reporting food insecurity versus 30% for White/Non-Latinx Coloradans.⁷⁶

Universal school meals are essential to addressing racial inequities in food security, as all students would have greater access to the nutritional resources needed for success in and out of the classroom.

IMPROVE EQUITY AND ACCESS FOR IMMIGRANT POPULATIONS

Universal school meals would also increase food accessibility for the immigrant student population. While no longer active, a 2019 Public Charge Rule made it so immigrants could be denied lawful permanent residency (green cards) or visas in the United States if they utilized certain public benefits for low income families. While the school meal programs were never one of the





government benefits used to determine Public Charge, many immigrant families feared--and still fear--participating in any sort of government benefit due to interagency information sharing.⁷⁷ Overall, the 2019 Public Charge rule resulted in many eligible immigrant families forgoing public benefits, including the Free and Reduced-Price meal program and SNAP even if they were eligible.⁷⁸ The Public Charge Rule has created lasting ripple effects with many immigrant families facing an unclear and intimidating climate for immigration enforcement. In light of this uncertainty, families have reportedly avoided or dropped SNAP, thus compromising their students' meal status and accessibility.⁷⁹ In 2020, 20% of immigrant families with children and 28.8% of low-income immigrant families with children avoided at least one public benefit due to anxiety about green card status.⁸⁰ Immigrant families are also more likely to live in food deserts than their U.S. citizen counterparts, so universal school meal programs will be key to addressing this nutritional disparity.⁸¹

Immigrant student populations also experience barriers to accessing meals due to concerns about sharing identifying data. Immigrant families are much more likely to forgo school meals for their children, even at free or reduced prices, as they are concerned their eligibility information could be shared with the U.S. Immigration and Customs Enforcement (ICE) or others and lead to actions, like deportation, that negatively impact family members.⁸² Survey data of immigrant community members and immigrant-serving organizations in Colorado has highlighted this fear as a significant barrier for immigrant students accessing school meals in Colorado.⁸³

Under the 2020 USDA meal waivers, for example, Boulder Valley School District (BVSD) was able to provide students with free meals without requiring that families share sensitive information. However, when BVSD's waivers lapsed for a brief two-week period and BVSD had to implement an eligibility verification requirement, the demand for student meals dropped by 80-85% from prior weeks.⁸⁴

During this time, many students' families expressed concern about how eligibility information would be used.

Universal meals, on the other hand, would give immigrant parents and guardians the confidence that their children can eat food at school without jeopardizing the residency status of any family member.

IMPROVE STUDENT ATTENDANCE AND BEHAVIOR

Research consistently reveals the potential of universal school meals to improve student attendance rates, as well. A study examining 1,000 schools in Wisconsin found that, among low-income students, universal school meal participation was correlated with both a 0.24% increase of days attended in overall attendance rates and a 3.5% decrease in the percentage of students with low attendance.⁸⁵ Such correlation between SBP participation and improved

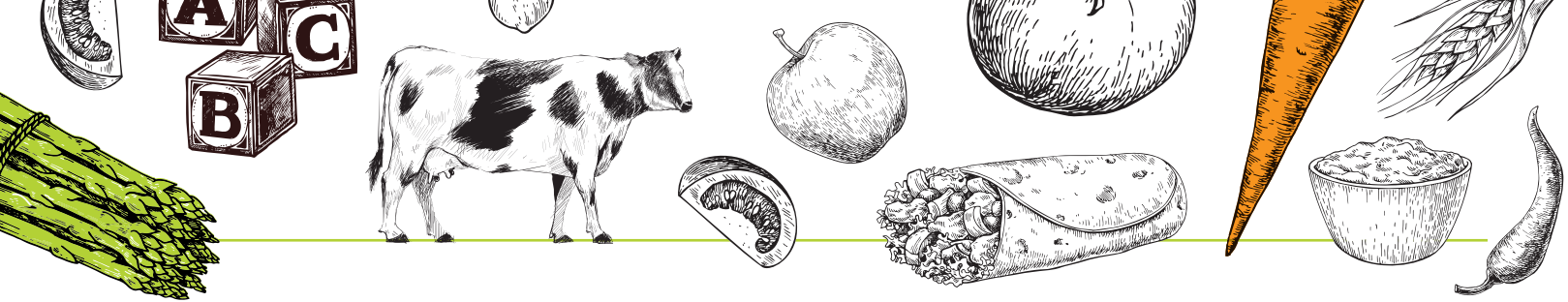
"Students are definitely doing better. Student behavior is much better, especially in the mornings, since they are predictably eating. They are sitting better and learning better because they don't have empty bellies. They are much more focused." - CO school nutrition director

attendance has also been found in Boston⁸⁶ and New York City.⁸⁷ CEP participation has also been linked with comprehensively higher student attendance rates.⁸⁸ Consistent access to breakfast alone boosts attendance rates by as much as 3.5%.⁸⁹

Additionally, studies show an association between universal school meal program participation and reductions in out-of-school suspensions, as well as improved interpersonal behaviors.^{90, 91, 92, 93, 94}

Interviews in Colorado during COVID reiterated this message, with one school





food director explaining, "I think we've seen a big difference in attendance, especially with our older kids. They don't need to run to the store to get food to get pizza or chips - they can just stay here to eat." Another nutrition director articulated that "Students are definitely doing better. Student behavior is much better, especially in the mornings, since they are predictably eating. They are sitting better and learning better because they don't have empty bellies. They are much more focused."

While the range of causative mechanisms is not completely clear, universal school meals has a well-documented track record of improving student attendance and behavior.

IMPROVE DIET QUALITY THROUGH HIGHER NUTRITIONAL VALUE IN SCHOOL MEALS

As student participation in school meals is linked with a higher quality daily diet,⁹⁵ universal school meals is an effective tool in helping students improve their diets and achieve higher overall nutritional intakes.

Universal school meals would expand student access to meals that seek to improve child health. The Healthy, Hunger-Free Kids Act of 2010 (HHFKA) updated school nutrition standards for the first time in 15 years. As a result, school meals now contain more fruit, vegetables and whole grains and also limit sodium, calories and unhealthy fat.⁹⁶ Thanks to the updated nutrition standards, school foods provide better nutrition quality than grocery stores, restaurants, and worksites.⁹⁷ As a result, students who eat school meals regularly have healthier diets than those who don't.^{98,99,100}

Universal school meals will widen this nutritional advantage to all students. After HHFKA was implemented, increased participation in school meal programs has been strongly associated with improved student dietary intakes during the school day, especially as regards to vegetables, whole grains, and fruit.¹⁰¹ A Colorado school nutrition director noted that "We are doing a lot of fresh fruit, fresh vegetables, and I have been noticing they [the

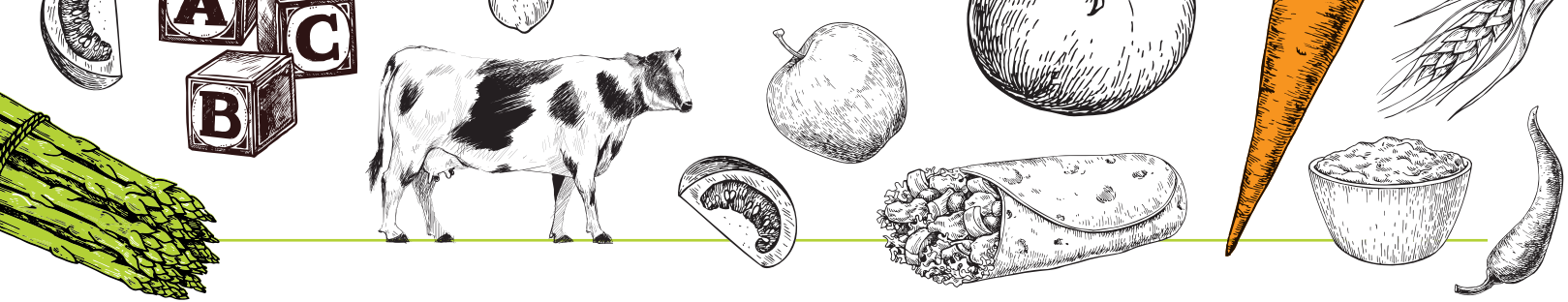
"What we do see is--we are doing a lot of fresh fruit, fresh vegetables--and I have recently been noticing that they are eating their fruits and vegetables first, before their entree."- CO school nutrition director

students] are eating their fruits and vegetables first, before their entree." Additionally, students who eat school meals also have statistically significantly higher intakes of whole grains.¹⁰² School meal participants are also less likely than nonparticipants to eat desserts and snacks, and have smaller overall caloric intake per meal.¹⁰³ School meal participants, on average, consume a higher percentage of calories from protein sources and fewer calories from total fat and saturated fat.¹⁰⁴ Comprehensively, meals consumed by school meal participants are much more consistent with the Dietary Guidelines for Americans than lunches consumed by nonparticipants.¹⁰⁵ Such nutritional superiority of school meals has been found as early in the classroom as pre-kindergarten and kindergarten.¹⁰⁶

By providing predictable, stable, sufficient access to nutritious food, as ensured by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), universal school meals would facilitate widespread nutritional accessibility.

"We have a lot of hungry families in our community. I'm seeing a lot of increase in SNAP benefits from the years past. So, there is a lot of job loss...I have gotten personal emails and thank yous from the families that have definitely benefited from [universal school meals]... That's the one thing they don't need to worry about right now" - CO school nutrition director





ELIMINATE SCHOOL LUNCH SHAMING

By definition, universal school meals would ensure that all students have access to the same food and that no student is negatively singled-out for their family's (in)ability to pay. Currently in Colorado and across the US, there are no systemic protections that prevent shaming low-income students for not having the resources to buy lunch. Colorado school nutrition directors are all too familiar with this phenomenon that leaves kids hungry. One director said, "In previous years, I used to field phone calls all the time from parents saying 'Do not let my kid eat, we can't afford to pay for those meals.' We don't get those phone calls anymore."

Nationwide, 75% of school districts have accumulated unpaid meal debt; the amount of this debt has grown substantially in recent years, despite widespread efforts to support families and prevent or minimize student meal charges¹⁰⁷. In 2017,¹⁰⁸ the USDA's FNS required all school food authorities (SFAs) operating the NSLP and/or SBP to have a written unpaid meal charge policy. This requirement, however, created significant leeway in terms of what unpaid meal charge policies could require, ranging from: (1) charging all available reimbursable meals to the student's account; (2) charging a limited number or type of meals to the student's account; (3) giving

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the student an alternate meal; or (4) neither charging a meal to the student's account nor give the student an alternate meal. The lack of a standardized meal charge policy facilitated structural opportunities to shame lower-income students and their families for their inability to pay by creating disparate treatment or meal debt for the family.¹⁰⁹

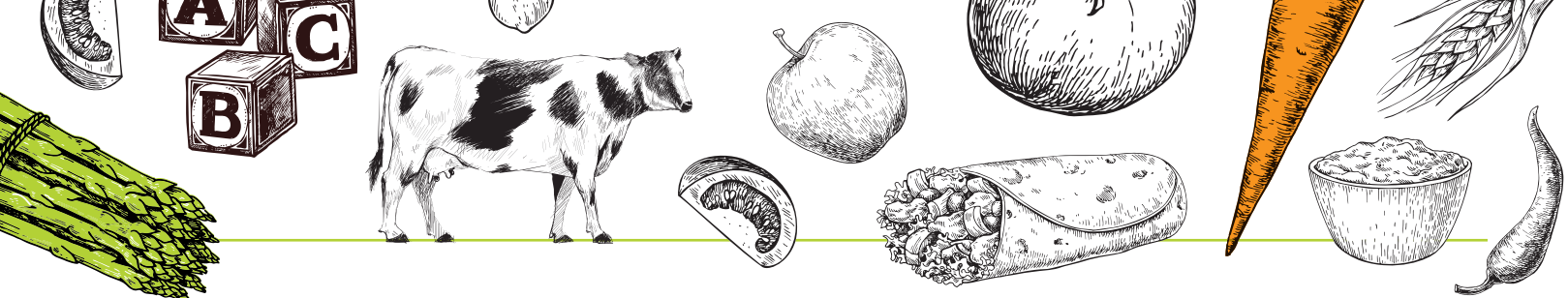
Overall, state and federal efforts have created a patchwork approach to supporting student households unable to consistently afford school meals. For example, Oregon¹¹⁰ and California¹¹¹ enacted legislation to ban any public identification and unequal treatment of students for the inability

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to pay and to ensure students are served meals regardless of their ability to pay their lunch debt balance. Comparatively, newly enacted legislation in Texas¹¹² and Hawaii¹¹³ merely creates grace periods for student meal debt collection and provides local authorities with time to determine how to handle the debt, while also allowing the student to continue to eat meals for a predetermined length of time. Proposed federal legislation¹¹⁴, while not yet codified, would both prohibit public schools from shaming students for meal debt or inability to pay and authorize federal reimbursement for meals for up to 90 days.

By automatically providing school breakfast and lunch to each student, universal school meals would ensure that low-income students are not penalized socially and nutritionally for their inability to pay. Under the waivers, Colorado school nutrition directors know what this means for students across the state - "Kids don't have to worry about parents telling them, 'you can't eat breakfast' or 'you can't eat lunch,' and getting angry at them for putting charges on their meal account. It removes the fear of being charged for that meal." Another Colorado school nutrition director articulated that "We have a lot of hungry families in our





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community... I've gotten a lot of personal emails and thank you's from the families that have definitely benefited from [universal school meals]. That's the one thing they don't need to worry about right now." Another Colorado nutrition director noted that "With the waivers, the stress is not on our kids of getting phone calls every night and not hearing me tell them every day 'Have you let your mom know you need lunch money?' It puts the kids in the middle of a lot of stress. And I'm sure my parents are thrilled too."

STRENGTHEN NUTRITIONAL SECURITY FOR STUDENTS AND THEIR FAMILIES

Universal school meals expands access to school meals, which has been proven to reduce childhood food insecurity.^{115, 116, 117} Childhood food insecurity damages cognitive function and academic performance, with potentially harmful, life-long implications for psychosocial and physical well-being.^{118, 119, 120, 121} Students in food-insecure households are more likely to develop chronic conditions (e.g., diabetes), be hospitalized and miss developmental milestones.^{122, 123, 124} Universal school meals programs, however, have been shown to reduce food insecurity in students' homes¹²⁵ and to mitigate some of the negative health and developmental impacts of household food insecurity.¹²⁶

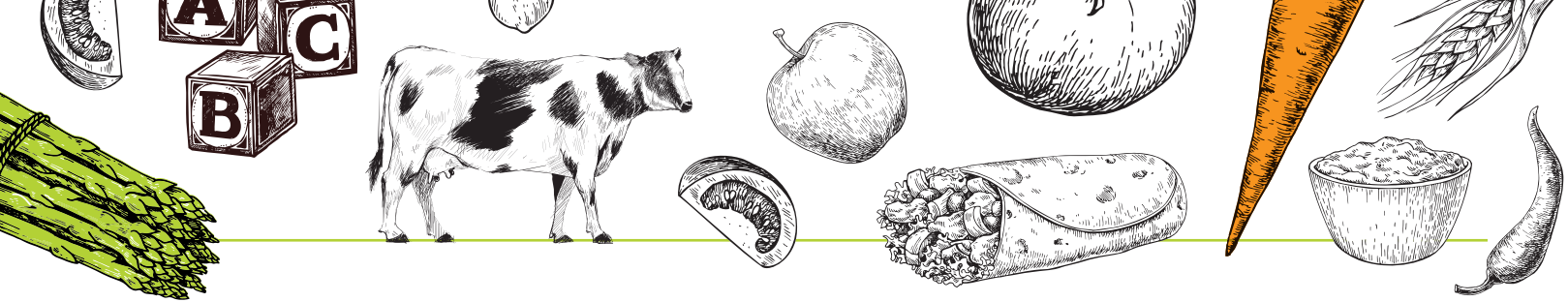
Universal school meals would also ensure meal accessibility for students regardless of fluctuations in their household incomes.¹²⁷ Families with low to moderate incomes (e.g. 130%-240% of the federal poverty level) experience income fluctuations

that cross between income eligibility thresholds approximately five times per year.¹²⁸ In other words, low- to median-income students may qualify for full-priced meals at one point in the year, but may soon become eligible for free- or reduced-price meals; However, the Free and Reduced-Price Meal Program application cycle is not responsive to these changes in need, especially as it is not widely advertised that families may technically re-apply if they've had a change in status.^{129, 130}

Additionally, when schools provide students with free meals, families can use their own funds to purchase food their child can eat at home.¹³¹ CEP increases the food-purchasing power of food-insecure families and is linked to improved household food security.¹³² Families in CEP-participating schools are 2.8 times less likely to report experiencing food security than families living in CEP-eligible, but not participating schools.¹³³ Also, students attending CEP-participating schools are half as likely to reside in food-insecure homes¹³⁴ than their counterparts attending non-CEP schools, even when controlling for family race/ethnicity and parent/guardian education level.¹³⁵ Similarly, research has shown that universal free breakfast programs are associated with lower rates of student hunger.¹³⁶ Universal school meals are thus key to addressing both student and household food insecurity.¹³⁷

Nationally, 1 in 7 children lives in a food insecure household (e.g., a household with limited or unpredictable access to food).¹³⁸ Colorado has also struggled with food insecurity before, throughout, and after the pandemic. In 2018, 10.35% of Coloradans experienced food insecurity and 16% of children were food insecure.^{139, 140} The COVID-19 pandemic has only made this situation worse. At one point during the pandemic, 38% of Coloradans were food insecure, more than twice the rate of food insecurity during the Great Recession.¹⁴¹ Racial disparities abound in Colorado's hunger rates - 52% Latinx and non-White Coloradans struggle to put food on the table, compared





to just 30% of White Coloradans.¹⁴² Additionally, children are greatly impacted by food insecurity across Colorado. 52% of Coloradan households with children are unable to predictably provide food for their families.¹⁴³ 25% of adults in Colorado cut back or skip meals due to lack of funds, and this percentage rises to 36% and 37% for Latinx and non-White households with children.¹⁴⁴ Overall, 25% of Colorado children are undernourished due to insufficient household resources.¹⁴⁵

"I honestly fear that if we had to add back in [paid meals], if we go from two years of not paying for those meals and those families relying on that income in other areas in their households, like rent, then if we have to put it back in, our unpaid meal debt is going to go through the roof. It already did before." - CO school nutrition director

Importantly, universal school meals would also relieve families from the administrative burden of submitting yearly eligibility applications for Free and Reduced-Price meals¹⁴⁶ and may help to mitigate some of the chronic stress often found in low- and moderate-income households.¹⁴⁷

By guaranteeing breakfast and lunches to each child every day at school, universal meal programs must be a pivotal component of any comprehensive effort to address Colorado's widespread food insecurity.

THE IMPACTS OF UNIVERSAL SCHOOL MEALS ON K12 SCHOOLS

Evidence from the literature review and Colorado interviews suggest that universal school meals would likely have impacts for K12 schools by: reducing administrative costs per meal; increasing the solvency and flexibility of school food service budgets; enabling critical investments in food sourcing, preparation, and the school kitchen

workforce; and potentially freeing up state general fund resources for alternative uses.

REDUCE ADMINISTRATIVE COSTS PER MEAL

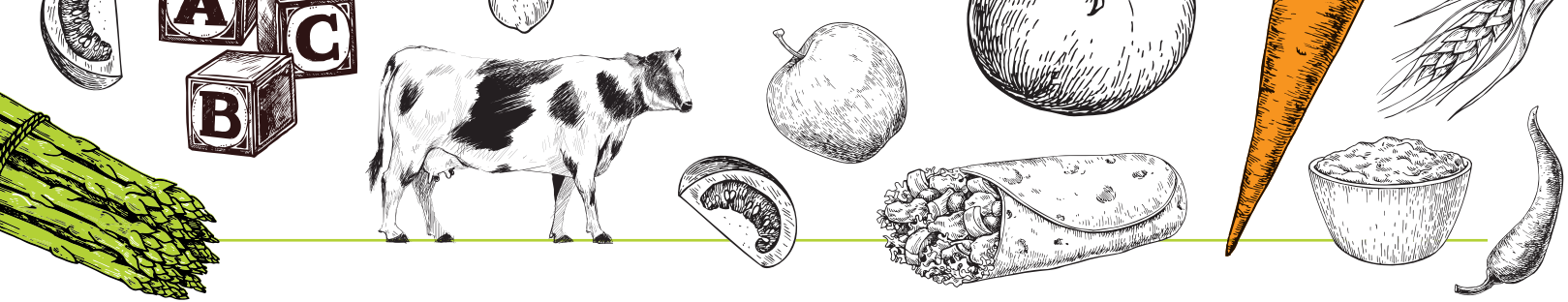
Research¹⁴⁸ has shown that universal school meals and Community Eligibility Provision (CEP) participation are correlated with lower per-student meal costs for medium and large schools, particularly for breakfast. The economies of scale¹⁴⁹ facilitated by universal school meals reduces the overall administrative costs per meal and the added administrative costs of obtaining lunch payments, collecting meal debts¹⁵⁰, and validating Free and Reduced-Price meal program applications each year.¹⁵¹

In the day-to-day execution of meal provision, universal meal programs eliminate the need in many districts for staff and time-intensive meal service protocols (like requiring each student to enter their student number at the register and taking cash payments) which will (1) facilitate smoother school meal times, allowing food service managers to focus on preparing and serving meals and (2) give students more time to eat (which would in turn reduce plate waste) and return to the classroom in a timely manner¹⁵².

INCREASE SOLVENCY AND FLEXIBILITY OF SCHOOL FOOD SERVICE BUDGETS

School food service budgets are strongly dependent on federal and state reimbursement rates for school meals. Schools currently operate at a deficit, as federal meal reimbursement rates¹⁵³ do not adequately match the cost of serving meals.¹⁵⁴ While schools spend an average of \$3.81 per lunch meal and \$2.72 per breakfast, they are only reimbursed for \$3.32 and \$1.88 for each lunch and breakfast served, respectively. These inadequate reimbursement rates, combined with meal debts, often need to be back-filled by limited state budgets. Some schools try to compensate for such low operating costs by selling snacks, a la carte options, and full-





priced meals. Within the current program, schools must also finance staff time each year to apply for these inadequate federal reimbursements. Optimally, universal school meals would maximize schools' financial efficiency and budget resources by adjusting food reimbursement rates to reflect the current pricing in the Consumer Price Index for food away from home.^{155, 156} This would help reverse and eventually eliminate negative balances in food service funds impacting school general funds across the state.

During the COVID-19 pandemic, schools incurred significant financial damage while feeding students. During the first 12 months of the COVID-19 pandemic (March 2020-February 2021), schools nationwide served 2.2 billion, or 30%, fewer meals compared to the preceding year (March 2019-February 2020), incurring a \$2.3 billion loss in federal revenue for school meal programs.¹⁵⁷ Another study revealed that 54% of school districts reported financial losses in the 2019-20 school year and 32% of schools did not have the funds to cover these debts. While losses averaged \$150,000 per school, individual schools lost anywhere between \$9,000 to \$8.4 million with the largest and poorest districts hit hardest¹⁵⁸. 62% of surveyed schools predicted additional financial deficits in the 2020-21 school year. Taken together these financial burdens may significantly undermine efforts to provide students with healthy food for years to come.¹⁵⁹ To note, comparable Colorado specific data are not currently available.

For many schools across the country, budget losses were largely due to school meal accessibility barriers for remote learners that significantly curtailed the number of meals for which districts could get reimbursement. Schools that were able to remain open and in-person largely did not experience these losses, as the waivers made available during the pandemic provided significantly higher meal reimbursement rates and garnered higher student meal participation (due to the elimination of all student- and family-facing costs). However, despite the savings made possible by these waivers, school

districts that operated in-person incurred significantly higher food packaging costs than in normal years, as grab-&-go food and disposable packaging were needed to meet COVID-19 public safety guidelines. For some well-resourced schools, revenue garnered by the waivers was enough to recoup pandemic-related packaging costs, but this did not hold true across the country. When health and safety guidelines allow schools to dispense with additional packaging requirements, there is significant potential for schools to retain higher revenues from universal meals and have more flexibility in deciding how to reinvest that money for student benefit.

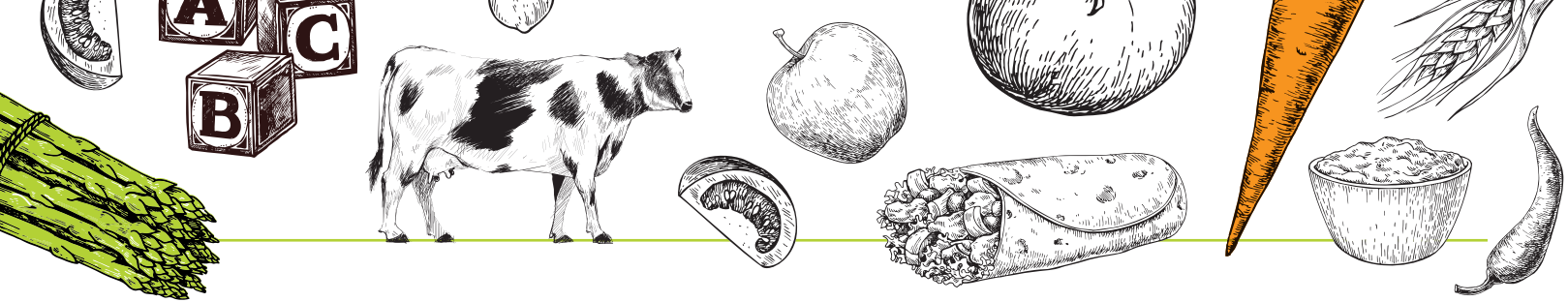
ENABLE CRITICAL INVESTMENTS IN FOOD SOURCING, PREPARATION, AND THE SCHOOL KITCHEN WORKFORCE

With higher reimbursement rates and lowered administrative costs per meal, universal school meals would unlock more dollars for other critical priorities like facilitating high quality scratch-cooked school meals and investing in school kitchen professionals.

The economies of scale created by universal school meals would improve the financial ability of SFAs to invest in local food sourcing and procurement.¹⁶⁰ For example, Austin Independent School District (AISD) food services director found that the school district has more buying power when they serve more students. They calculated that if every student not currently eating school lunch chose to do so once a week, the district could start serving all grass-fed beef. If every student not eating school lunch chose to do so twice a week, AISD could serve entirely organic produce; and if every student not eating school lunch chose to do so three times a week, AISD could serve organic milk at every meal. ¹⁶¹ Yet many SFAs struggle with the added direct and indirect costs and complexity of purchasing local foods and report that additional resources would be needed to scale farm to school programs¹⁶².

During the COVID-19 pandemic, many local food programs were also scaled back, exacerbating the pandemic's strain





on local economies. As noted by one school food director in Colorado, “once things start to go back to normal again, that extra reimbursement will help us put money back into our local economy by being able to utilize those funds to procure food locally.”

“In the pandemic our scratch cooking and our home-cooked meals are giving the kids that one sense of normalcy. That has driven us to create more of our scratch cooked meals and go more away from that processed food. The waivers have let us try even harder to do that.”
- CO school nutrition director

Universal school meals could also help improve job security and ensure sufficient pay for members of the school kitchen workforce. Efforts to maximize food accessibility for students and families during the COVID-19 pandemic deepened school nutrition program deficits and revealed the financial precariousness of school food workers under the current structure of school meal programs.¹⁶³ As labor costs account for an average of 43.9% and 44.5% of total costs for SBP breakfast and NSLP lunch, respectively¹⁶⁴, 49.3% of schools reassigned nutrition staff, 27.5% reduced worker hours, and 7.9% laid off workers in response to widening food program deficits.¹⁶⁵ Universal school meals on the other hand would help districts avoid staff layoffs and maintain, or even potentially boost wages for food workers in elementary and secondary schools who earn an average annual wage of \$29,880 and \$31,070, respectively^{166,167}.

Universal school meals along with locally sourced foods and a high quality workforce could also help expand schools’ scratch cooking programs--which already operate in Colorado schools of all types (e.g. urban, rural, small, large, etc).¹⁶⁸ Scratch cooking has been shown to improve student eating behaviors and introduce students to new, healthful foods.¹⁶⁹

Scratch-cooking also improves student nutrition by reducing or eliminating foods high in added sugars, saturated fat, and sodium from student meals and increasing the proportion of fresh vegetables and fruits that students consume.^{170, 171, 172, 173, 174, 175, 176, 177, 178, 179} Scratch cooking also allows schools to operate on equivalent or reduced production costs and can reduce food waste.^{180, 181, 182, 183, 184} As scratch cooking encourages confidence in the nutritional content of school food, it is associated with a 3-19% increase in school meal program participation and, consequently, increased meal program revenue.^{185, 186, 187, 188} These gains would be even higher with universal school meals.

Successfully expanding scratch-cooked, nutritious meals for students also requires investments in higher quality food, trained labor, and scale/facility appropriate equipment.^{189, 190}

POTENTIALLY FREE UP STATE GENERAL FUND RESOURCES FOR ALTERNATIVE USES

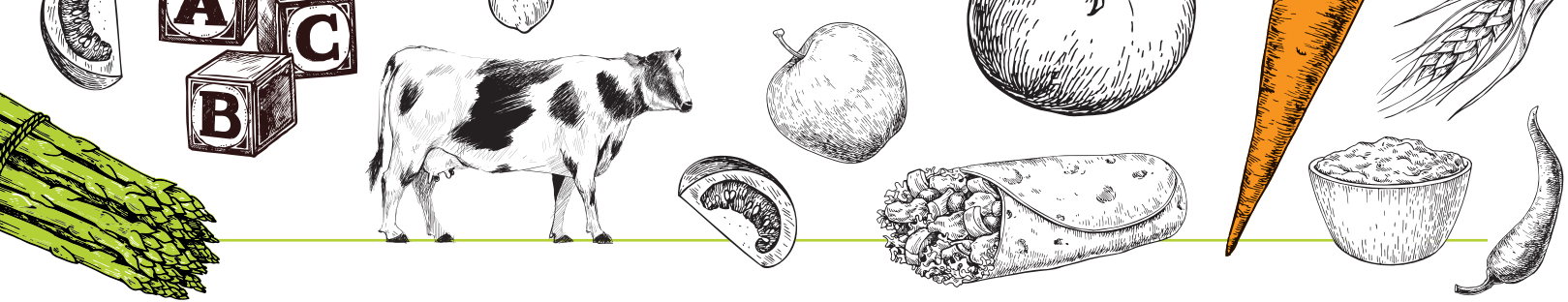
Lastly, universal school meals could potentially free up \$2.5 million per year in state general fund resources. Colorado offers a reduced price meal copay of \$0.40 cents per lunch¹⁹¹ and \$0.30 for breakfast¹⁹² to reimburse SFAs for the added costs of reduced price lunches¹⁹³, which helps improve access to meals across Colorado. Between 2015 and 2019, Colorado spent an average of \$2,527,572 from the general fund on those programs (ranging from \$2,355,664 to \$2,939,122).¹⁹⁴ Depending on the federal government’s role in universal school meals and the reimbursement rate, this annual expenditure could be redeployed for an alternative use.

RECOMMENDED NEXT STEPS FOR COLORADO

UNIVERSAL SCHOOL MEALS SUPPORTS COLORADO’S K12 STUDENTS

In summary, evidence appears sufficient that universal school meals in Colorado would likely impact K12 students by:





reducing school meal stigma; improving racial equity and justice; increasing participation in school meal programs; improving student achievement; bolstering student health and wellbeing; and strengthening nutritional security for students and their families.

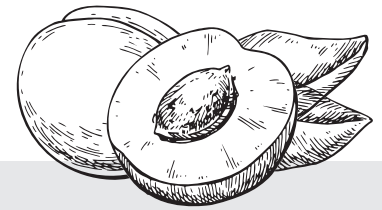
As one Colorado school food director summarized “I have been a huge proponent of [universal school meals]. For our little community, if we have to go back to paying for meals, I really fear what will happen with a lot of these kids. Especially, because the kids don’t get it. The kids don’t understand the difference between mom & dad paying for a meal or the state paying for the meal - they just want to eat. And when they show up hungry to school and we say “um, you can’t, you’re not able to eat”, that’s what they understand. That is where it will really impact our communities, and those hungry bellies of those little, little guys that need to eat.”

UNIVERSAL SCHOOL MEALS SUPPORTS COLORADO’S K12 SCHOOLS

Universal school meals in Colorado would likely impact K12 schools by: improving meal quality and the nutritional value of school meals; reducing administrative costs per meal; increasing the solvency and flexibility of school food service budgets; enabling critical investments in food sourcing, preparation, and the school kitchen workforce; and potentially freeing up state general fund resources for alternative uses.

Colorado should lead in the research, development, and implementation of policy options at the federal and state level to provide access to universal school meals for all Colorado students. Additional research is specifically needed to understand the lifelong impacts of universal school meal programs on participating students, as well as the net impacts of universal school meal programs on state general funds and school district general funds (which are strongly dependent on specific policies). Subsequent Issue Briefs should be developed to assess the potential impacts of specific proposed

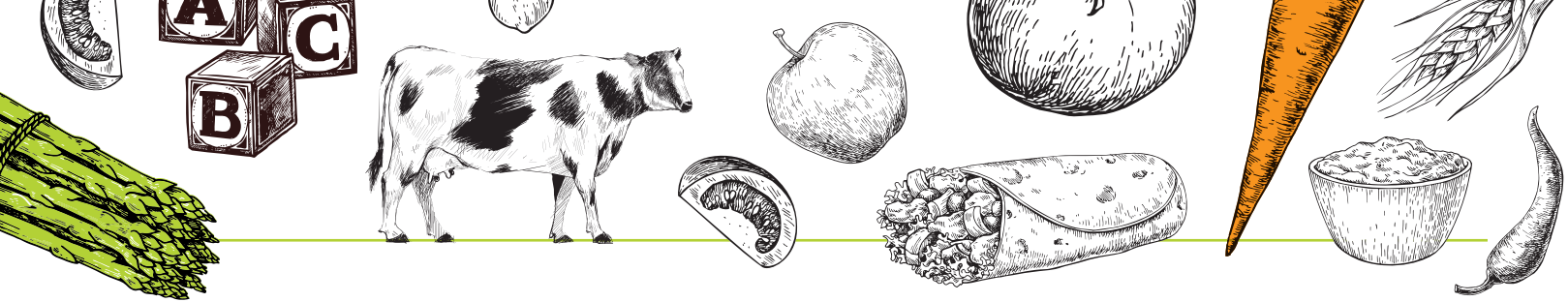
(for example, CSPI model state bill language¹⁹⁵), adopted legislation particularly based on federal legislative changes as part of Child Nutrition Reauthorization (CNR), or elements of President Biden’s American Families Plan if enacted.



THE AMERICAN FAMILIES PLAN

President Biden’s American Families Plan (AFP) proposes over \$40 billion for child nutrition. In terms of school meals, the AFP invests \$17 billion in expanding free meals for students in school districts, school groupings, or schools with at least 40% of its students enrolled in SNAP. This expansion will be facilitated by higher meal reimbursement rates through CEP. Additionally, the AFP will lower the CEP participation threshold for elementary schools to just 25% of student participation in SNAP. Biden’s proposal will also provide free meals to an additional 9.3 million students, approximately 70% of whom are in elementary schools, by expanding direct certification to automatically enroll students into Free-and Reduced-Meal programs based upon Medicaid and Supplemental Security Income data, in addition to SNAP. While not directly related to this brief, the American Families Plan will also address student nutrition by: (1) launching a \$1 billion healthy foods incentive program to provide enhanced meal reimbursement rates to schools already expanding healthy food options for students; and (2) investing \$25 billion to make the Summer Pandemic-EBT program permanent and available to all 29 million students receiving Free and Reduced-Price meals.^{196, 197}





UNDERSTANDING THE COMMUNITY ELIGIBILITY PROVISION (CEP)

The Community Eligibility Provision (CEP) provides an excellent glance into the potential financial relief schools can secure via universal school meals. CEP is a current federal reimbursement model that allows eligible school districts and schools to offer free meals to all students. CEP is available to schools, groups of schools, or school districts depending on their percentage of low-income students, or Identified Student Percentages (ISPs), who are receiving benefits from means-tested assistance programs (e.g., Supplemental Nutrition Assistance Program (SNAP)). Eligibility for CEP is achieved at 40% ISP or higher. Schools participating in the CEP program must also participate in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) and track the number of breakfasts and lunches served daily. CEP-participating schools are also required to use non-Federal funds to cover any costs of providing free meals that exceed the Federal reimbursements.¹⁹⁸

Under CEP, the Federal reimbursement for school meals is based on the ISP of the participating entity (district, school, or group of schools). A multiplier is applied to the ISP to determine the share of meals reimbursed at the free rate. All remaining meals are reimbursed at the paid rate. The multiplier accounts for the share of students eligible for Free and Reduced-Price (FRP) meals that is not captured through direct certification. The U.S. Secretary of Agriculture, under authorities granted by the National School Lunch Act has set the multiplier at 1.6 (its statutory maximum)¹⁹⁹. For example, a

group of schools with a total ISP of 50% will have 80% of their served meals reimbursed at the free meal reimbursement rate ($1.6 \times 50\% = 80\%$), and the remaining 20% of meals served will be reimbursed at federal paid rate.²⁰⁰ Due to the current multiplier rate, only districts with ISP rates above 62.5% will get fully reimbursed at the free rate for all meals, which can further reduce participation. As a point of reference, the free rate for lunch was \$3.58 in the 2020-21 school year compared to the paid rate of \$0.40. For breakfast the rates were \$1.89 and \$0.32 respectively²⁰¹.

A USDA evaluation of CEP found that school districts participating in CEP received more federal funding than non-participating districts via higher federal reimbursements; with CEP such federal reimbursements were 5.6% and 1.9% higher for NSLP and SBP respectively. Additionally, as CEP circumvents the need for staff to obtain and review applications for Free and Reduced-Price meals, the federal evaluation showed that CEP allows schools to reduce labor costs by approximately \$30/student/year.²⁰² Overall the USDA evaluation revealed CEP participation allows schools to accrue 13.5% more in federal funding via reimbursements each year, equating to \$5.33 more per student.²⁰³

In Colorado, some schools have expressed concerns about potential impacts on school finances through Title 1 funding if Family Economic Data Survey (FEDS)/ Free and Reduced Lunch (FRL) eligibility forms are not collected; however, multiple other states offer potential models to address this concern.

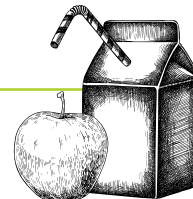
RECOMMENDED CITATION

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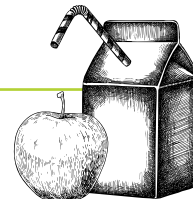




ENDNOTES

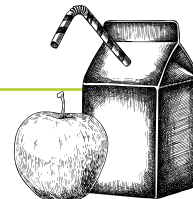
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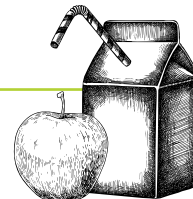
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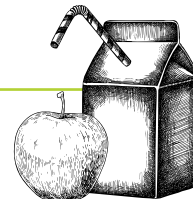
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