

# **Establishing a Healthy School Meals for All Program in Rhode Island: Exploring Policy Gaps and Recommendations**

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## **Background**

The early wave of the COVID-19 pandemic resulted in urgent school shut-downs across the country, disrupting the breakfast and lunch food services offered to millions of children<sup>1</sup>. In response to the crisis, the federal government issued waivers for all schools to provide meals free of charge to students between March 2020 and June 2022<sup>2</sup>. For the first time in its history, the United States had a national “Healthy School Meals for All” (HSMFA) program.

U.S. school meal programs are a key driver to improve food insecurity for children<sup>3</sup>. Breakfasts and lunches served at school are more nutritious than meals obtained elsewhere and are critical intervention points to combat the childhood obesity epidemic<sup>4</sup>. This is especially true for children from low-income households. Access to quality meals improves kids’ concentration in the classroom and contributes to better academic performance<sup>5</sup>. Unsurprisingly, data from the pandemic-era universal meals waivers reveal similar benefits<sup>6</sup>. And when support to provide kids free, healthy school meals is cut, students, particularly from Black, Latino, and Native American families, suffer<sup>7</sup>.

### **Why does Rhode Island (RI) need HSMFA legislation now?**

Although 85% of breakfasts and about 70% of school lunches are served for free or at a reduced-price, RI’s school meals program does not reach every child who faces food insufficiency<sup>8</sup>. Some vulnerable children are ineligible for school food assistance because their family does not meet federal income thresholds. For example, a two-parent, two-child household in 2022 that earned above the \$51,338 eligibility threshold and below the “standard of need” budget would still struggle to afford basic expenses for housing, transportation, healthcare, childcare, and food<sup>8</sup>.

Even when students are technically eligible to receive free or reduce priced school meals they might still miss out. Households with children who are eligible and registered to receive benefits from the federal Supplemental Nutrition Assistance Program (SNAP) automatically receive free school meals in RI. But not every eligible household is registered for SNAP, and therefore that child is not automatically flagged to receive free school meals. The latest United States Department of Agriculture (USDA) report on SNAP participation rates indicate that there were nearly 400,000 children in the U.S. who were eligible, but not registered in pre-pandemic 2020<sup>9</sup>. Although during that same period all 43,660 RI children who were eligible for SNAP received benefits, RI has since experienced a 5% increase in the number of children participating in SNAP<sup>10,11,12</sup>. It’s crucial the USDA determine post-pandemic participation rates in the state to ensure no eligible child is being missed.

Additionally, 81,000 households in RI had their benefits reduced to just \$6 per person, per day after Congress ended pandemic SNAP Emergency Allotments in March 2023<sup>13</sup>. These cuts were particularly damaging to households on the precipice

of the SNAP income qualifying limit. Despite being on the edge of what's known as the "benefits cliff," (on the cusp of not qualifying based on income) some parents with children are forced to seek additional income to make up for lost SNAP dollars. If that extra paycheck pushes them over the SNAP qualifying limit, children in that household can lose access to free or reduced-priced school meals.

And in the not-too-distant past, some RI districts subjected children to "lunch shaming." School program administrators in RI came under national fire in 2019 after Warwick Public Schools announced that students with lunch debt would be denied a hot meal, and instead served a sunflower butter and jelly sandwich<sup>14</sup>.

An unplanned experiment on free breakfast and lunch for students during the COVID-19 crisis reignited calls for a permanent system in schools. RI was one of 33 states that introduced HSMFA bills between 2021 and 2023 but efforts were unsuccessful. Governor McKee did not include the necessary funding in his 2025 budget proposal. Instead, he allotted about \$800,000 to extend free breakfast and lunch to 6,500 students who already qualified for reduced meals.

To enact legislation in RI, it's important to understand the following:

- i. Without a HSMFA policy, how do U.S. children become eligible to receive free or reduced-price meals and what are the challenges with this structure?
- i. To what extent are RI schools taking advantage of the current systems to provide students with free and reduced-price meals?
- i. What strategies did states successful in passing HSMFA legislation employ and how can RI use those approaches to implement their own policy?

Answers to these questions will support HSMFA community advocates and help legislators secure the estimated \$40 million funding that's needed to provide healthy school meals for all students.

### **How did RI children access free or reduced-price school meals in 2023?**

#### *i. School Meal Waivers*

Traditional USDA qualifications require parents submit an application to the school. All schools in RI accept paper applications that are available for download in English and Spanish on the Rhode Island Department of Education (RIDE) website. Most families can opt to submit online applications, but 10 districts – Barrington, Central Falls Public, Chariho, Foster, Jamestown, Johnston, Little Compton, Middletown, Newport and Warwick Public Schools – only accept paper applications. Families only need to fill out one application per household if the children are attending school in the same district, but they do need to reapply each year. Approved

applications are only valid for that school year and the first 30 days of the subsequent year.

Eligibility for free or reduced-price breakfast and lunch is based on federal poverty guidelines. The federal poverty level (FPL) is the official measure used to establish eligibility for many federal assistance programs. But the definition has not changed since its creation in the 1960s. It is based on three times the cost of the minimum food diet from 1963, adjusted for inflation. In 2023, the U.S. Department of Health and Human Services calculated the FPL income threshold to be \$30,000 for a family of four. This standard considers neither the cost of other living expenses like housing or transportation, nor the regional differences between those costs. It also does not reflect the fact that average American family spends less of their budget on food – about one-sixth– compared to one-third when the poverty line was established<sup>15,16</sup>. Therefore, the current FPL is inaccurate and lower than it would be if it reflected the cost basic living expenses for American families today.

Rhode Island students receive meals at no cost if their gross household income is at or below 130% of the FPL, or at a reduced price for \$0.30 for breakfast and \$0.40 for lunch if the gross income is between 130%-185% of the FPL<sup>9</sup>. The latter income limit amounts to no greater than \$55,500 for a family of four.

#### *ii. Direct Certification*

Schools can offer free meals through direct certification. Children in households that participate in SNAP or are enrolled in the RI Works Program are automatically eligible, and receive free school meals without the need to submit additional paperwork<sup>17</sup>. Students who are under the legal responsibility of a foster care agency, are participating in Head Start, or meet the definition of homeless, runaway, or migrant also qualify but require an application that can be submitted by a social worker or homeless liaison. The RI Department of Human Services (RI DHS) notifies families that fall under this category (and their respective schools) of direct certification eligibility, covering those who have not already applied traditionally. While RI DHS does their best to reach all eligible families, any SNAP or RI Works-eligible family that has not received their notification will need to use the traditional meal application and indicate their program ID.

The USDA introduced direct certification in 1986 to increase access to school meals. Despite the streamlined process, nearly half of the local education boards around the country were still not directly certifying children participating in SNAP nearly 20 years later. In a 2010 attempt to increase certifications, The Healthy Hunger-Free Kids Act mandated that states must directly certify 95% of all students receiving SNAP, approving them for free meals. At that time, RI schools were reported to be directly certifying 72% of students receiving SNAP<sup>18</sup>. It took the state nearly ten years to directly certify 100% of school-age SNAP participants to receive free school meals<sup>19</sup>.

### *iii. The Community Eligibility Provision*

The most common way schools can qualify to provide their students meals at no cost is by participating in the Community Eligibility Provision (CEP). Students in CEP-participating schools receive school meals free of charge regardless of household income, making CEP the most equitable option.

CEP is funded through a combination of federal and state dollars. The amount of federal reimbursement a school receives is based on the percentage of eligible students in a school, or the identified student percentage (ISP). The way the calculation is set up, schools with ISPs of at least 62.5% receive a federal reimbursement that covers the entire cost of all meals served. Schools with ISPs less than 62.5% do not receive full federal reimbursement and must make up the difference themselves. The lower a school's ISP, the less likely it is they will have the funds to cover their share of meal costs. Therefore, even when schools are technically eligible for CEP, they may not be able to offer all of their students free school meals.

Schools and districts can opt into CEP if 25% or more of their students are identified to be "categorically eligible" – the same criteria as direct certification (listed above). The USDA lowered the eligibility threshold from 40% to 25% in October 2023 for the first time since the program's inception<sup>20</sup>. Lowering the threshold opens the door for more schools to participate, but it doesn't provide schools with more funding to cover the associated costs. States with schools that don't receive the full federal reimbursement, at ISPs below 62.5%, may not have funding in their budget to pay for the school's share of the meals. In the 2022-2023 school year, RI's percentage of schools using CEP was below the national average. Only 77.3% of eligible schools had adopted CEP compared to 82% nationwide<sup>21</sup>.

School district administrators can maximize federal reimbursement dollars by strategizing the way they participate in CEP. If a school has an ISP at or near the full reimbursement rate of 62.5%, there is no financial reason not to participate in CEP. Schools within the same district that have different ISPs can choose to group together. This way, lower ISP schools left footing a hefty bill can opt-in with the group's average ISP and receive a greater reimbursement than they would operating alone.

As of the 2023-2024 school year, Providence, West Warwick and Woonsocket are the only public-school districts providing free meals to all their students through CEP. Central Falls provides free meal through another USDA high-poverty program called Provision 2. Seven out of sixteen Pawtucket schools, and one out of eight schools in North Kingstown provide free meals to students through CEP<sup>22</sup>. Woonsocket schools were eligible for CEP during the 2022-2023 school year, but did not participate, along with two in the Cranston Public School district (ISPs of 41.5% and 45.7%), two in Newport (ISPs of 42.1% and 43.9%) and one in West Warwick (ISP of 40.5%).

## **Strategies from states with HSMFA programs**

Rhode island was one of 33 states that used momentum from the federal government's universal meals waivers during the pandemic to introduce HSMFA legislation<sup>23</sup>. As of October 2023, only California, Colorado, Michigan, Minnesota, Maine, Massachusetts, New Mexico, and Vermont have been successful in passing and funding their policies. Apart from Maine, each state used the CEP as a jumping off point and requires eligible schools to maximize federal meal reimbursements. Maine policymakers were wary of overstepping communities' autonomy and decided only to recommend maximizing CEP dollars. Furthermore, Colorado's entire program is optional, and schools must opt in to participate.

States use different strategies to fund their policies. Massachusetts, Vermont, and Colorado increased tax revenue by imposing a four percent surtax on the portion of an individual's income that exceeds \$1 million, increasing property tax rates by \$0.03, and capping state income tax deductions for taxpayers with federal adjusted gross incomes of greater than \$300,000<sup>24</sup>.

California's universal meal plan passed as part of the state's budget bill in companion legislation called an omnibus budget trailer education bill<sup>24</sup>. These trailer bills include provisions related to funding, policies, and implementation for education spending that are not fully covered in the main budget legislation. They use simple majority votes and take effect immediately on being signed by the governor. The bill also provided \$150 million in one-time to upgrade kitchen infrastructure and train foodservice staff the year prior to implementation. The following year, California included \$600 million for additional school kitchen upgrades.

Maine's legislation requires the state government to cover the remaining meal costs after federal reimbursement to schools. During the state's first year of implementation, Maine anti-hunger advocacy group Full Plates Full Potential was awarded \$10 million from the USDA Healthy Meals Incentives Initiative<sup>25</sup>. The program accepts applications from any organization that can manage and distribute sub-grants to small and rural school meal programs.

The way in which legislators passed their bills also differed. Colorado initially proposed funding their Healthy Meals for All program through the state's general fund, but the measure failed due to budget concerns and constitutional limitations<sup>24</sup>. It was then referred to a public ballot where it passed with 56.75% of the votes. Vermont's bipartisan House Committee on Agriculture Food Resiliency and Forestry passed their policy without their governor's signature who claimed it was unfair to raise taxes to purchase meals for the children of wealthy families<sup>26</sup>.

Effective commonalities across the eight states' policies include funding to expand kitchen infrastructure, support staff training, and policy language to encourage or fund local food purchasing.

## **Rhode Island's previous attempts to pass HSMFA legislation**

Rhode Island legislators introduced five separate bills to enact a HSMFA program in the 2022-2023 legislative session: SB68 sponsored by Senate Committee on Education Chairwoman Sandra Cano (D-Dist. 8, Pawtucket), SB71 by Sen. Jonathon Acosta (D-Dist 16 Pawtucket), HB5141 and HB5639 by Deputy Majority Leader Justine Caldwell, and H6007 by Rep. Tanzi (D-Dist. 34, South Kingstown, Narragansett).

The two most robust bills, by Reps. Caldwell, introduced on February 15, and Tanzi, introduced on March 1, 2023, are nearly identical. Both bills require schools to: 1) maximize federal CEP reimbursements, 2) make breakfast available at the start of the school day and serve breakfast meals that can be eaten in the classroom to accommodate children who do not arrive early to school, 3) extend lunch periods to no less than 30 minutes, 4) prioritize local food purchasing, 5) offer scratch-prepared foods, provide culturally relevant meals, and 6) solicit menu feedback from students and families.

Rep. Caldwell reintroduced HB5639 as H7400 on January 31, 2024.

Rep. Tanzi's bill includes two additional subsections: A mandate that public schools failing to follow the above requirements be reimbursed for meals only at federal reimbursement rate for paid meals (\$0.42 in 2023) rather than the difference between the federal free rate (\$3.85 in 2023) and the paid rate. Additionally, Rep. Tanzi's bill allows families and students to pay for meals if they choose to offset the state's cost of the meals for all programs. Both bills were recommended to be held for further study by the House Finance Committee.

Sens. Cano and Acosta were successful in passing their respective bills, which included smaller changes, through the Senate. Both bills modified existing language in the RI General Laws to ensure schools would be required to provide free breakfast and lunch to all students regardless of income. Nevertheless, House Speaker Joseph Shekarchi reported that the program's estimated \$40 million cost was not going to be covered in the governor's 2024 budget proposal 2023<sup>27</sup>.

## **Future Directions**

President Biden's 2024 budget included meaningful expansions to school food funding as part of the administration's National Strategy on Hunger, Nutrition, and Health<sup>28</sup>. The USDA will provide over \$15 billion in the next 10 years to increase state and school participation in CEP. An additional 9 million school children are estimated to benefit from free school meals during that time.

Still, more work is needed. Legislators at both the federal and state level must champion specific changes, including increasing permanent federal reimbursement

rates and investing in local food systems, to establish a budget that provides healthy school meals to all students in RI and lasts beyond the current presidency.

*i. Changes at the federal level*

The number one way to swiftly improve access to free school meals is to increase the federal meal reimbursements received by schools and establish a statewide CEP, rather than many smaller school or district-level programs. Both policy changes appeared in the Healthy Meals, Healthy Kids Act, introduced by House Education and Labor Chairman Bobby Scott (D-VA) and the initial 2022 “Build Back Better” bill introduced by Rep. John Yarmuth (D-KY), but neither were implemented. The former bill died in the Education and Labor committee. The House passed the latter with language related to increased access to CEP and free school meals, but the Senate stripped the bill of those improvements before it was approved.

Although the USDA lowered the CEP eligibility threshold from 40% to 25% Congressional action is needed to provide more federal dollars to schools. Legislation like the School Meals Expansion Act introduced by Rep. Morgan McGarvey (D-KY) specifically aims to improve CEP participation by increasing federal reimbursements. As part of the calculation to determine reimbursement amounts, a school’s ISP is multiplied by a factor of 1.6 to determine the percentage of meals reimbursed at the federal free rate. Rep. McGarvey’s bill would increase the multiplier to 2.5, increasing federal reimbursements, and making CEP more financially viable for schools with lower ISPs. In RI, less than half of CEP-eligible schools with ISPs between 40-50% participated in CEP, while every eligible school with an ISP of 60% or greater participated<sup>22</sup>.

*ii. Changes at the state level*

Barring the passage of a national, HSMFA program, the most financially viable option for RI to provide free breakfast and lunch to all students is to 1) maximize federal reimbursements through participation in CEP and 2) establish a permanent budget to cover meal costs for lower-ISP schools that do not receive the full federal reimbursement. RI can learn from states with HSMFA programs to inform its policy.

California more than tripled the per-meal reimbursement rate that the state pays to schools, from \$0.245 to \$0.89 to make it more financially viable for schools to participate in CEP<sup>29</sup>. The state’s department of education also recommends schools sell foods outside of traditional breakfast and lunch to increase nutrition program revenue. These so-called nonprogram foods can be sold in vending machine, as a la carte options, or for adult meals. In RI, schools could use revenue from a RIDE initiative called Menu for Success<sup>30</sup>. At the beginning of SY 2023-2024, the state invested \$1.625 million to provide food trucks to 13 districts, over half of which are eligible to participate in CEP. The program aims to provide job opportunities for students and raise funds for school programs.



Rhode Island has options to increase the meals budget for schools in the state. RIDE can submit a waiver request to allow schools to spend their own food service dollars on CEP costs<sup>31</sup>. This would make participating in CEP more financially viable for schools that don't receive full federal meal reimbursements. The state's General Assembly should also consider updating the public education funding formula to represent all students in poverty. The current formula used to determine the amount of state aid distributed to each public school district only includes students living in poverty (defined by school meal program participation) from pre-kindergarten through sixth grade<sup>32</sup>. Students in grades seven through 12 who are living in poverty are not counted in the funding distribution formula. This methodology should be updated to include all students living in poverty and ensure schools are receiving sufficient state funds to provide meals to all of students.

It's also time for RI to invest a greater share of school meal dollars into scratch cooking and local food purchasing. Like Vermont and Maine, two states with existing HSMFA programs, RI has a robust food system<sup>33, 34</sup>. Yet more than one-in-ten school districts are not serving local foods, and less than half serve local vegetables at least once a week<sup>35</sup>. Students are more likely to eat meals from farm-to-school programs, and enjoy greater access to fresh, nutrient-dense foods, while schools generate increased revenue and decrease meal programming costs<sup>36, 37, 38</sup>. Free resources and grants from organizations like the Chef Ann Foundation can help RI schools increase farm-to-school participation by mitigating implementation barriers across kitchen facility infrastructure, budgets for staff training, and menu planning.

Making school meals free to all students is a logical and long-overdue strategy. When President Harry Truman established the National School Lunch Program in 1946, he affirmed that "safeguarding the health of the well-being of the Nation's children," by supporting states' efforts to offer healthy meals was a measure of national security. Passing Healthy School Meals for All legislation will establish a much-needed, permanent funding system and guarantee equitable food access to children in Rhode Island.

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