THE CLASS OF 1964 POLICY RESEARCH SHOP

EXPANDING UNIVERSAL SCHOOL MEALS FOR THE FUTURE OF VERMONT CHILDREN

PRESENTED TO THE VERMONT HOUSE COMMITTEE ON EDUCATION

Representative Peter Conlon, Chair

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EXECUTIVE SUMMARY

During the COVID-19 pandemic, the federal government funded Universal School Meals (USMs) nationwide. After seeing robust benefits for students and teachers, Vermont policymakers decided to continue this program at the state level for the 2022-23 school year. However, sustaining USMs comes at a cost. This report identifies the impacts and feasibility of extending USMs in Vermont and gives the Vermont House Committee on Education recommendations based on three state comparisons, three Vermont middle school focus groups, and a thorough cost analysis. The state comparisons are based on elite interviews with state nutritional directors and prominent non-profit organizations in Nevada, Maine, and Vermont. The focus groups consist of teachers and staff members from three geographically and socioeconomically diverse middle schools in the state. Finally, the cost analysis builds on the original methods of the Joint Fiscal Office (JFO), but uses newly available data. After completing these three research components and taking into account recent federal rule changes, this report concludes there are feasible paths for the continuation of funding for USMs in Vermont.

1 INTRODUCTION

Along with the emergence of Zoom classrooms, the COVID-19 pandemic brought USMs to every state in the country. Equipped with USMs, schools provided breakfast and lunch to all students, entirely free of charge. USMs works in conjunction with the National School Lunch Program (NSLP) and School Breakfast Program (SBP). Both of these are federally-funded programs that provide free or reduced-price meals for students whose families' incomes are below 185 percent of the federal poverty level.[1]

While USMs were federally funded from 2020 to 2022, funding was no longer available for the 2022-23 school year. In response, five states chose to extend USMs, using state funds to make up the difference between NSLP and SBP funding and the amount needed to cover USMs. Vermont has extended USMs for one year with bipartisan support and virtually no opposition regarding the program's efficacy and benefits.[2] However, cost cannot be overlooked. Despite its uncontestable benefits, the Vermont House of Representatives must consider the cost of extending USMs in the future and whether the benefits outweigh the costs.

2 PROBLEM STATEMENT

USMs have achieved concrete benefits for students, including improving student achievement, reducing school meal stigma, increasing school meal participation, and bolstering student health and well-being.[3] To maintain these benefits, Vermont passed the Universal School Meals Act in May 2022 to continue the program for K-12 public schools for the 2022-23 school year.[4]

However, providing USMs comes at a cost. Vermont's bill appropriated $29 million from the Education Fund to the Agency of Education to support the program for the 2022-23 school year alone, which equates to approximately five percent of the entire budget for the Vermont Agency of Education for fiscal year 2023.[5] If USMs have clear benefits for students and their families, how can Vermont maximize the benefits of such provisions while also minimizing the associated costs? What strategies can be used when implementing USMs that can minimize costs to the state while maximizing benefits for students?

3 METHODOLOGY

Our methodology includes a comparative case study consisting of three states, focus groups conducted at Vermont middle schools, and a cost analysis of USMs. After conducting a preliminary analysis of the structure of federal and state programs, we selected two states, in addition to Vermont, which have expanded school meal access for our case study. This includes Maine, a neighboring state which has permanently extended USMs and has been vigilant in encouraging increased form signups to maximize federal funding. We also investigated Nevada, a state which has expanded USMs only for the 2022-2023 school year with the use of federal funds. Nevada has a robust online application to certify students and is a participant in the USDA Medicaid Direct Certification Pilot Program. Specifically, we conducted elite interviews with state nutritional directors and nonprofits which played key roles in the passage and implementation of USMs legislation in each state. Our comparisons focus on cost and certification.

To better understand the impacts of USMs on meal-related stigma among students, we conducted focus groups with teachers and counselors at three Vermont middle schools. We stratified Vermont schools by geographic area and the percentage of students directly certified for free or reduced meals (Identified Student Percentage, or ISP). We then randomly chose schools which differed from each other in these categories. Focus groups provided teachers with the opportunity to share their unique perspectives on school meals, including how stigma and shame may manifest in the cafeteria, classroom, and general school culture.

Finally, we conducted a cost analysis for Vermont's Universal School Meals Act and the possible extension of this legislation. Using the model developed by Vermont's Joint Fiscal Office (JFO), updated school meal participation rates from the Vermont Agency of Education (AOE), and other relevant data, we analyzed the cost to Vermont of providing USMs in the 2022-23 school year, the 2024-25 school year, and in the long term.

4 BACKGROUND

This section explains the current federal and Vermont state legislation in place to expand access to meals. Additionally, this section examines the benefits of USMs identified in social science research.

4.1 FEDERAL POLICY LANDSCAPE

The two federal programs which provide free and reduced-price meals to students across the U.S. are the National School Lunch Program (NSLP) and the School Breakfast Program (SBP).[6] These programs include two key provisions that maximize federal funding: Provision II and the Community Eligibility Provision (CEP). These programs remain in place in states which have implemented USMs, providing federal funding for students who meet federal eligibility requirements.

NSLP was established in 1946 under the Richard B. Russell National School Lunch Act. The purpose of the program is to provide free or reduced-price lunches to children. Participating schools report certification data from their students, and must agree to meet up-to-date nutritional requirements to receive federal reimbursements. There are two ways for students to be certified into this program: direct certification and an application-based system. Each state has different requirements for students who are directly certified for the program, including direct certification for children in foster care, those with Veterans in their family, and those enrolled in social welfare programs. Application-based enrollment is determined by household income and family size. Children from families with incomes at or below 130 percent of the Federal Poverty Level are eligible for free meals while those between 130 and 185 percent of the Federal Poverty Level are eligible for reduced-price meals. Families that fall into either of these groups but have not already been directly certified must complete an application to be certified for NSLP.[7]

NSLP includes Provision II, which reduces application burdens and simplifies meal counting by limiting federal reporting to once every four years.[8] During the first year, schools take meal counts and report the percentage of meals served in the free, reduced-price, and paid categories. During the following three years, the school does not need to make new eligibility determinations and only counts the total number of free or reduced-price meals served each day. While schools must annually collect applications, this provision decreases the intensity of data reported each year (within the four-year period). In addition to simplifying meal counts, this provision may result in higher federal reimbursements for schools who have higher certification rates in the base year than in future years.

Additionally, NSLP includes the Community Eligibility Provision (CEP), a more robust program for schools and districts in low-income areas. Schools that are eligible for CEP are able to offer breakfast and lunch to all enrolled students for no cost and without applications (a program essentially equivalent to USMs). To be eligible for CEP, a school must have more than 40 percent of students who are directly certified for free or reduced-price meals under NSLP.[9] With CEP, schools multiply the percentage of directly certified students by 1.6 in order to determine the percentage of meals served to certified students. This determines the percentage of school meals that are fully reimbursed by the federal government because reduced meals and paid meals are reimbursed at lower rates. For some schools which are eligible for CEP, it may be more financially viable to participate in Provision II instead. This is dependent on the breakdown of certified students into the directly-certified and application-certified categories.

The second federal program is the School Breakfast Program (SBP), which was piloted in 1966 and permanently enacted by Congress in 1975.[10] The SBP operates exactly the same as NSLP and is amended by Provisions I through III and CEP. The only differences are that the SBP provides breakfast rather than lunch, the cost per breakfast is lower than the cost per lunch, and that the SBP offers alternative models such as Breakfast in the Classroom—where students eat during instruction time—and Grab and Go Breakfast—where students take breakfast to go.

4.2 VERMONT POLICY LANDSCAPE

Prior to the COVID-19 pandemic, Vermont's school meal policies were typical for a New England state. All K-12 schools were required to provide free or reduced-price meals through NSLP and SBP.[11] Vermont also chose to eliminate the reduced-price fee for both breakfast and lunch.[12] Relative to other states, Vermont had more comprehensive state-level support for school districts.

Hunger Free Vermont—the state's leading anti-hunger advocacy organization—began working in 2014 to assist Vermont schools in implementing USMs through CEP.[13] The organization has helped over 90 Vermont schools with higher percentages of low-income students apply for CEP.[14] This work has been accompanied by a 2018 University of Vermont (UVM) study examining the effects of USMs. The study found several wide-ranging benefits, which include improved health and well-being and higher academic performance among all students.[15]

4.2.1 THE UNIVERSAL SCHOOL MEALS ACT

In an effort to maintain the benefits of USMs once federal funding stopped after the COVID-19 pandemic, Vermont passed the Universal School Meals Act in May of 2022.[16] The act extended USMs for the 2022-23 school year and appropriated $29 million from the General Education Fund to cover the cost of the program.[17] The JFO estimated in May 2022 that the true cost of one year of USMs falls between $25 million and $42 million.[18] In January 2023, the AOE delivered a report to the House and Senate Committees on Education, the House and Senate Committees on Appropriations, the House Committee on Ways and Means, and the Senate Committee on Finance with data from the first three months of the 2022-23 school year measuring student participation rates on an individual school level, the relationship of federal rules to the program, and strategies to minimize the use of state funds.[19] In February 2023, the JFO submitted a report examining possible revenue sources to fund this program, including raising the sales tax and enacting an excise tax on sugar sweetened beverages.[20] We utilized both reports to inform our cost analysis.

4.2.2 ELIGIBILITY AND CERTIFICATION RATES

The pressing issue facing the Vermont State Legislature is securing funding to continue this program in subsequent years. The number of students certified for free or reduced-price meals plays an important role in this discussion. Certified students are those eligible for free or reduced-price meals and are either directly enrolled or have completed an application. Students who are directly enrolled in Vermont are limited to those receiving services under the McKinney-Vento Homelessness

Assistance Act, the Runaway and Homeless Youth Act, the Migrant Education Program, and the federal HeadStart Program, as well as students in foster care or living in a household where any member receives Reach Up (TANF) or 3SquaresVT (SNAP). In addition, Vermont was recently approved to participate in the USDA Medicaid Direct Certification Pilot Program, which will increase direct certification levels significantly (see later sections for more details on this program).

Families who are not eligible for direct certification are less likely to complete an application under USMs, since this application is unnecessary for receiving free meals. However, the more students who become certified, the more federal funding will become available to Vermont, decreasing the cost of USMs. Understanding the gap between eligibility and certification is essential because promoting certification can help close the gap and in turn reduce costs for Vermont.

4.3 BENEFITS OF UNIVERSAL SCHOOL MEALS

USMs have numerous benefits for students and school environments. Mainly, they increase meal participation, reduce stigma, correlate with higher academic performance, and improve student physical and mental well-being.

Regarding meal participation, providing universal school breakfast led to a 35 percent and 20 percent increase in meal participation among full and reduced-price students in New York City, respectively.[21] The program also led to a five percent increase in meal participation among students eligible for free meals.[22] In contrast, research has found that even if free lunch eligibility rises within a high school by ten percent, it is correlated with a less than two percent increase in school meal program participation.[23] This suggests that the universal model increases meal participation more than merely expanding free or reduced meal eligibility. Additionally, USMs reduce meal stigma. According to the USDA, "stigma" is the perception that school meals only serve low-income students; in particular, stigma emerges from the negative social pressure that many students feel about being a "free meal kid."[24] School meal stigma is most acute in schools with a smaller percentage of free meal-eligible students because it may be easier to identify those students who are eating free meals.[25]

USMs are also consistently correlated with higher academic scores, such as increased math and reading scores by as much as 10 to 15 percent of standard deviation on average.[26] When students regularly have access to a healthy breakfast, they are more likely to score higher in terms of memory and attention throughout the day than those who do not.[27] Finally, USMs improve student health and well-being. Higher rates of student participation in school meals are correlated with reduced rates of obesity and poor health, and USMs help mitigate nutrient deficiencies that are associated with mental, behavioral, and physical health problems.

5 IMPLEMENTING UNIVERSAL SCHOOL MEALS

The following section outlines the findings and conclusions of a state-level case study of the implementation of Universal School Meals.

5.1 CASE STUDIES OF SIMILARLY POSITIONED STATES

To best understand the policy options available to Vermont, we started by examining what comparable states have done to expand school meal access since the onset of the COVID-19 pandemic. After engaging in preliminary research, we conducted elite interviews with state nutritional directors and key non-profit members to address two factors: cost and certification. The states we selected in addition to Vermont are Maine and Nevada. Below, we have included a brief rationale for each state's inclusion.

Maine has a demographic makeup and geographic location most similar to Vermont. A vastly white, rural state with an aging population, Maine holds a similar political climate and faces similar funding challenges. Maine has permanently extended USMs, but has higher levels of federal funding available to them to cover these costs.[28] In addition to expanding school meal access, Maine has been vigilant in encouraging increased form signups to maximize federal funds, including flyers, online applications, and media releases.[29]

Nevada has also expanded USMs for the 2022-23 school year, and only elected to continue USMs for the 2023-2024 school year after the interview was conducted.[30] The state has made no final decisions on school meal policies in future years. Nevada is especially important for comparison because of its robust online application program as well as participation in the Medicaid direct certification pilot program that Vermont has just joined.[31]

To conduct the elite interviews, we identified state nutritional directors or staff members in comparable roles (contact information can be found in Appendix A): Rosie Krueger (Vermont), Jane McLucas (Maine), and Brittany Mally (Nevada). We also identified staff members at two nonprofits, Full Plate Full Potential (Maine), and Hunger Free Vermont, which each played a key role in passing and implementing USMs in their respective state. The specific questions we directed at the state nutritional directors as well as the nonprofit organizations can be found in Appendix B.

5.1.1 MAINE

To gain further insight about Maine's permanent extension of USMs, we conducted an elite interview with State Director of Child Nutrition, Jane McLucas. McLucas answered questions regarding certification rates and federal programming. Concerning certification, McLucas touted the importance of the state-wide online application that allows any family to fill out the free and reduced meal application online. However, the creation of this application, while legislative driven, was more costly to implement than originally anticipated. And even with the online applications, the number of applicants has decreased since USMs went into effect, likely because families no longer have to complete the application in order for their student to receive a free meal. This has led to a concern at the local level regarding federal funding allocation. More specifically, McLucas discussed the issues with federal funding being determined by the number of free and reduced meal applications. In response, Maine is looking into changing the way poverty is measured at the state level to increase direct certification and maintain the maximum amount of federal funding.

5.1.2 FULL PLATES FULL POTENTIAL MAINE

To supplement the interview with Jane McLucas, we spoke with Anna Korsen, the program director of Full Plates Full Potential, a non-profit organization with the goal of ending childhood hunger in Maine. Full Plates Full Potential was the driving force behind the legislative efforts that secured the future of USMs in Maine. Korsen shared detailed information regarding certification efforts and federal programming that Maine must take advantage of to minimize state costs. Full Plate Full Potential launched a campaign and toolkit to increase accessibility and maintain the number of free and reduced meal applications despite USMs. This outreach program, costing around $25,000, included informational flyers, explanatory memos, and the online application portal. However despite these efforts, the number of families completing the application still dropped significantly, from 43 percent in 2019/2022 to 35 percent in 2022-23. Additionally, the online portal which costs over $200,000 per year, was only utilized by about 5,000 families since it became available in October 2022.

With a decrease in applications, Korsen emphasized the importance of maximizing federal funds. Currently, when schools participate in CEP or Provision II they bear the financial risk of paying for meals that go beyond the expected meal counts, as calculated using the 1.6 multiplier.[32] USMs eliminate this risk, allowing schools to maximize federal funding. However, the state remains concerned that a decrease in school meal applications will not only impact meal funding, but also the amount allocated to Title I schools, affecting education funding as well. The upcoming decrease in CEP eligibility percentage will help Maine resolve these issues, however their lack of participation in the Medicaid Direct Certification pilot program is a huge financial loss, according to Korsen.

5.1.3 NEVADA

We also spoke with Nevada's School Nutrition Supervisor Brittany Mally. Nevada has extended USMs for the 2022-23 and 2023-24 school years through the use of American Rescue Plan funds. Mally articulated three key points. First, CEP has enabled the state to afford Universal School Meals. In particular, Clark County — the fifth largest school district in the U.S. — is registered for district-wide CEP, which has significantly maximized federal reimbursements for the state.[33] Before the COVID-19 pandemic, many schools in Nevada were "in the red," endangering school nutrition programs. As a result of CEP, schools experience higher participation rates and receive higher federal reimbursements. This has provided many school districts with excess funds to spend on better quality food, equipment, and other investments into their programs; as a result the majority of school districts are "in the black." Additionally, through USMs, schools do not have to take the financial risk of covering meals that are not fully reimbursed by the federal government, increasing motivation to enroll in CEP and Provision II.

Second, maintaining direct certification under USMs will require sustained coordination between school districts and Nevada's Department of Agriculture, Department of Education, and Department of Health and Human Services. Specifically, Nevada proactively updates its direct certification list

twice a month, rather than the required three times a year, in order to increase its direct certification rate and maximize federal funding.

Third, Nevada has faced some communication challenges with families who are directly certified via the Medicaid pilot program. When schools sent Medicaid-eligible families a direct certification notification letter, some parents called to remove their children from direct certification because they believed they were "taking away" meals from other students. Thus, it is imperative to communicate to families that direct certification does not take meals away from other students, and instead increases federal funding, which makes it possible for more students to receive free meals in the first place. Assistance from a nonprofit in communicating changes to school nutrition programs would be crucial to keeping the public informed and encouraging participation in school meals.

5.1.4 VERMONT

We spoke with State Director of Child Nutrition Programs Rosie Krueger, who provided insight on the future of meal certification in the state. Director Kreuger expressed five main points. First, the language of the Universal School Meals Act states that schools must participate in whichever option provides the most federal funding in order to receive state funding for USMs. It is precisely this language of conditional funding that gives the State of Vermont the authority to require CEP or Provision II participation. As a result, the State of Vermont is well positioned to maximize its federal funding to subsidize the cost of USMs.

Second, Director Kreuger reported that AOE staff members worked with schools during Summer 2022 to enroll them in CEP or Provision II and audit the process in order to ensure accuracy. AOE staff also worked to develop groupings on a School Food Authority (SFA) level to enroll as many schools as possible in CEP or Provision II. As of Fall 2022, over 20 additional schools are enrolled in CEP, with a total of 92 schools participating in the program.[34] The remaining public schools, as well as some independent schools, are participating in Provision II, which also increases federal reimbursement rates. As of now, 221 schools are starting new base years of Provision II.[35] Four schools are continuing previous Provision II cycles.[36] Director Kreuger stated that there was minimal difficulty in completing this work, but that it required dedicated time and effort. Specifically, CEP requires less administrative work than Provision II to implement because the former only requires schools to count the number of free or reduced meals served, while the latter requires data on the specific participation rates for free and reduced meals. Auditing Provision II schools also took longer than expected, and regrouping schools also caused an excess amount of work. Director Kreuger said that in future years, there will likely be an increase in work due to the Medicaid pilot program, as schools may choose to restart base years in both CEP and Provision II to increase federal reimbursements. Regardless of whether USMs are extended, Director Kreuger expects to see an increase in work because many schools will not want to rely on local funds to continue expanding meal access. As a result, AOE will likely require additional personnel to complete this work, which may be accomplished through temporary staffing.

Third, Director Kreuger reported that it is unlikely that meal applications will be facilitated via a state-wide online system in the future. Many schools in Vermont currently have their own online systems that are provided by their respective SFA, and Director Kreuger feels that it would be unnecessary to overhaul this system when she has anecdotally heard that return rates are fairly high with online applications managed by private vendors. Additionally, although Vermont has considered creating an electronic version of the Universal Income Form, Director Kreuger said that it would not make sense to invest resources into digitalization because the Medicaid pilot program will collect similar information and replace the need for this form.

Fourth, the Medicaid pilot program will increase the number of directly certified students in Vermont by at least 4,000 students.[37] Data will come from the Department of Vermont Health Access (DVHA) to the AOE, and it will be processed in the same way as SNAP/3SquaresVT data. A list of directly certifiable students will then be uploaded into the state system, and each school will receive a list of those students who are enrolled at their school. Although the USDA requires this process to be conducted three times a year, Director Kreuger expects it to occur on a monthly basis in order to maximize direct certification numbers.

Fifth, Director Kreuger expects the CEP threshold to lower from 40 percent to 25 percent based on previous federal legislation that has proposed this decrease in threshold, such as Build Back Better. Director Kreuger said that this decrease would result in a significant increase in CEP-eligible schools. The effects of this change on the cost of USMs is discussed in further detail in the cost analysis section of this report.

5.1.5 HUNGER FREE VERMONT

We also spoke with Teddy Waszazak, Hunger Free Vermont's Universal School Meals Campaign Manager. Through its work with the Vermont Agency of Education on the "Fill out the Form" campaign, Hunger Free Vermont encouraged families to complete meal application forms, resulting in an increase of 20 schools participating in CEP. The campaign included letters, posters, social media posts, and newsletters to families. Due to the language of Vermont's Universal School Meals Act requiring the "maximization" of federal funding, Waszazak emphasized that helping schools apply for CEP and Provision II is the best option because it significantly reduces Vermont's cost by increasing federal reimbursements. However, if Vermont elects to not extend USMs, individual school districts will bear the financial burden of covering meals beyond those fully covered by federal reimbursements, which might endanger their ability to participate in these programs. As a result, schools might withdraw from those federal programs altogether, decreasing student access to school meals.

Additionally, Waszazak reported that prior to USMs, the application rate for free and reduced meals was 38 percent; during the 2022-23 school year, the application rate was approximately 36 percent.[38] Since sustaining students' application rate is necessary in order to further maximize federal reimbursements, this minor reduction demonstrates the success of the "Fill The Form" campaign, and how extending USMs will not necessarily result in a major decrease in free and reduced meal

applications. Moreover, ensuring that families fill out free and reduced meal applications will help schools reach the CEP eligibility threshold by subsidizing more students who are not directly certified for free meals.

5.2 CASE STUDY CONCLUSIONS

Our case study analysis reveals five main takeaways. Two takeaways are related to cost, while the other three regard certification. Beginning with cost, our first main finding is that Vermont's ability to afford USMs is enabled by the specific language of its Universal School Meals Act. The Act requires schools to maximize federal funds in order to receive state funding, a requirement that is unique to Vermont and has resulted in higher participation in Provision II and CEP among eligible schools in Vermont, relative to other states. Second, USMs are the best way to maximize federal funding because school districts do not have to bear the financial risk of participation in Provision II or CEP. If Vermont were to elect to not extend USMs, individual school districts might struggle to cover meals beyond those fully covered by federal reimbursements, which would endanger their ability to participate in these programs, decreasing student access to school meals.

Regarding certification, the first key takeaway is that it may be expensive and ineffective for Vermont to move forward with developing a universal online system for free and reduced-meal applications. Second, other states have observed that free and reduced-meal applications decrease over time due to USMs, which means that direct certification will play a key role in minimizing this issue. With the Medicaid pilot program and the subsequent increase in directly-certified students in Vermont, careful coordination between the relevant agencies will be essential to streamline information. Specifically, agencies will need to more frequently update lists of directly-certified students and provide them to schools in order to maximize federal funding. When schools provide direct certification notification letters to families, they should include information about what direct certification means and explain that direct certification increases federal funding, making it possible for more students to receive free meals. Third, in order to continue maximizing federal funding, the State of Vermont will need to effectively communicate to families the importance of continuing to fill out free and reduced-meal applications despite USMs. The State could partner with Hunger Free Vermont to continue the work of the "Fill out the Form" campaign to maintain application rates.

6 UNIVERSAL SCHOOL MEALS: SCHOOL STAFF PERSPECTIVES

This section outlines findings from focus groups conducted with three Vermont middle schools to gain the perspective of teachers and other staff members. Staff members had the opportunity to share the changes they have witnessed as a result of USMs, as well as their general knowledge of meal stigma and how it presents itself in the classroom.

6.1 FOCUS GROUPS AT VERMONT MIDDLE SCHOOLS

We conducted three focus groups with Vermont middle school teachers and staff members to gain insight on meal-related stigma. We took two factors into consideration when selecting schools to participate in our focus groups: geographic location and school ISP. We randomly selected schools from three different geographic areas in the states as well as from three different ISP brackets. Regarding the ISP brackets, we selected one school with a 20 percent or lower ISP, one with between 35 and 40 percent ISP, and one with above a 40 percent ISP. As a result, our sample includes one school with only a small percentage of students receiving free or reduced meals, one school which just misses the threshold for CEP certification, and a school which was able to receive universal free meals through CEP prior to the COVID-19 pandemic. We assigned the middle of the state to the 20 percent and below ISP, the northern end of the state to the 35 to 40 percent ISP, and the southern part of the state to the 40 percent and above ISP. Aftering reaching out to principals at three randomly selected schools in each of these groups, we were able to schedule three focus groups meeting our criteria.

The principals were asked to select a group of at least five staff members to take part in the focus group. The groups ended up consisting of teachers, counselors, and behavioral specialists. Taking place in 30 to 45 minutes on Zoom, we used these focus groups to ask open ended questions regarding the impact of USMs since their implementation during the COVID-19 pandemic, as well as the effect they have had on student stigma levels. The focus groups were conversational with the participants moving naturally through the discussion. We spoke only to ask general questions in order to move the conversation forward and to confirm conclusions made by the group at large.

6.1.1 MIDDLE SCHOOL A

We spoke with nine staff members from Middle School A, which is located in the southern part of the state. The school has an ISP above 40 percent, which makes it eligible for CEP. Focus group members spoke about the impact of USMs on meal participation and stigma.

Regarding meal participation, teachers unanimously agreed that USMs have increased student meal participation. Prior to the COVID-19 pandemic, students who fell just above the threshold for free and reduced meals would sometimes skip meals. According to one teacher, USMs now means that "Nobody is sitting at their table with nothing to eat and that feels good." Since USMs eliminate logistical barriers at lunch — such as providing one's student ID number to validate their meal status — teachers also commented on how the line moves much quicker, creating more time for all students to eat during the meal period. Teachers noted that prior to the COVID-19 pandemic, they would often spend time teaching free and reduced-meal students how to go through the line, provide their number, and ensure that they were spending the right amount of money. This process was stressful for both teachers and students. With USMs, more students can not only eat meals, but more students can also enjoy their meal time before classes resume.

In regards to meal stigma, teachers agreed that prior to USMs, it was evident which students were receiving free or reduced meals. This was primarily because free and reduced-meal students were required to go through a different line and process in order to provide their number and validate their status. One teacher said that "there were more kids not getting lunch before because there was a stigma." It is important to note that focus group members spoke extensively about stigma in the context of families filling out forms. They said that both before and after the implementation of USMs, there has been shame surrounding paperwork and it has been difficult to convince parents to fill out the required forms because the process is intimidating and can feel intrusive.

6.1.2 MIDDLE SCHOOL B

We conducted a focus group with five teachers and one school counselor from Middle School B. This school is located in northern Vermont and currently has between 35 and 40 percent of its students eligible for free or reduced meals, falling just short of eligibility for CEP. The participants shared that for middle school students, breakfast is offered for students to bring back and eat during a morning advisory period. Lunch occurs in the cafeteria with two grades eating in each 25-minute lunch period. Even after the institution of USMs, students must swipe a lunch card after getting a school meal for data tracking purposes. This focus group illuminated the impact of USMs on meal participation rates and stigma.

Concerning meal participation, the participants spoke of the large number of families who failed to fill out free and reduced meal applications, despite being eligible. One teacher explained that some of her middle schoolers told her that their families would not fill out the form even if they asked them to do so. She blamed the sense of pride families have that prevent them from finding out whether or not they qualify. One student in particular was choosing not to eat lunch because she knew her parents would refuse to fill out the paperwork. This problem has been eliminated with USMs since student meal access no longer depends on completing an application.

Stigma was the largest topic discussed during the focus group. Another teacher cited USMs as a "big equalizer" since there was no way of students identifying their peers as those receiving free or reduced meals. Prior to USMs, students who brought their own lunch would sit down immediately in the lunchroom, while those receiving free or reduced lunch would often keep their heads down as they waited in line. This led to a physical division between the two as friend groups were often dictated by where students sat in the cafeteria. Additionally, prior to USMs there was a stressful process for students who did not pay their lunch bills. Another teacher shared that students would rack up a large bill for lunch which families would be unable to pay, leading to tension between school and home, which burdened the students the most.

The school counselor agreed, stating that there has been a "visible difference" pre- and post-USMs implementation, citing that she notices the number of students who are not on free or reduced lunch getting meals has increased substantially. She gave an example of a student who brought a meal from home only to spill it on the cafeteria floor. Prior to USMs, that student would have gone hungry but

instead was able to supplement her food with something from the cafeteria. Overall, the group concluded that USMs have "made a big difference in a very positive way" and have eliminated the sense of "haves" and "have nots" from the lunch room.

6.1.3 MIDDLE SCHOOL C

We conducted a focus group with six individuals from Middle School C. The middle school is located in western Vermont, and currently less than 20 percent of its students are eligible for free or reduced school meals, making it our most affluent middle school. Given its low eligibility rate, this school is particularly important to the study as any impacts on stigma dispel the concern that giving free meals to an already affluent student body is not uniquely beneficial and instead a waste of funds. The participants discussed both breakfast and lunch meal times, with breakfast being served to-go style and eaten either in the cafeteria or during a morning advisory period and lunch being served in the cafeteria with each grade level having about 30 minutes to eat. This focus group illuminated the impact of USMs on stigma as well as meal participation rates.

Speaking to meal participation more generally, the participants emphasized the impact this has had on student hunger. One participant shared that prior to the COVID-19 pandemic she noticed that students were consistently going to adults looking for food throughout the day, but "since the pandemic this extreme hunger doesn't seem to exist." Another participant spoke to the concern of food insecurity and said that it was an issue USMs was able to resolve at least during the school day. Another participant mentioned that without the financial burden of school lunches, families were able to have extra money in their pockets, giving them "the most ultimate form of justice" which this participant defined as choice.

Regarding stigma, teachers discussed the experiences of students prior to USM implementation during the COVID-19 pandemic. Before the pandemic, one teacher said that "the haves brought lunch from home and have-nots got lunch from school." Essentially, it was socially unacceptable for students to get a school meal prior to the pandemic. However, USMs "has eradicated that" as many students eat the school lunches and they are no longer an indication of status. For example, at the town's high school, only around 10 percent of students would get a school meal each day prior to USMs, but afterwards there has been a huge increase, showing a decline in the stigma associated with receiving a school meal. The increase in meal participation and decrease in stigma shows the unique benefits of USMs even in a middle school where the super majority of students are not already receiving free or reduced meals. Ultimately, the participants concluded that implementing USMs was a "no brainer," eliminating the barrier of stigma while increasing access to food for their students.

6.2 FOCUS GROUP CONCLUSIONS

We draw two main conclusions from our three focus groups: USMs led to a decrease in stigma and an increase in meal participation. Regardless of ISP, each middle school reported a visible decrease in the separation of students receiving free/reduced meals and those bringing their meals from home.

This separation was replaced with all students feeling comfortable accessing school meals and this has had a positive impact on school culture. Additionally, all three schools mentioned a decline in student hunger and food insecurity with the implementation of USMs. Seeing a large increase in meal participation, the schools said students are less likely to go hungry and more apt to get a meal from school under USMs. When asked what could be done to further decrease meal-related stigma, at least one participant from each school said extending USMs was the simple solution. Ultimately, there was unanimous support for USMs, with benefits mentioned for both staff members and students.

7 COST ANALYSIS

An important aspect of providing universal free meals to students in Vermont is calculating the annual cost of the program to the State. The purpose of this section is to outline the expected cost of providing Universal School Meals. The first section describes the methods used by the Vermont Joint Fiscal Office in May 2022 to produce the $29 million estimate for the 2022-23 school year, and subsequent improvements they have made to their model.[39] The second section uses updated data to improve upon the initial cost estimate. The third section uses updated data and considers two significant changes at the federal level to produce a cost estimate for the 2024-25 school year, if Universal School Meals were to be extended to future years. The final section includes a discussion of long-term trends which may affect the overall cost of providing such a program. The cost estimates in this section are not meant to predict the actual cost of providing USMs, but to try to communicate the relative cost of USMs and how this cost may change in future years.

7.1 JOINT FISCAL OFFICE (JFO) 2022-23 SCHOOL YEAR COST ESTIMATE

In May 2022, the Vermont Joint Fiscal Office (JFO) released a fiscal note for S.100 (Act 151: "Universal School Meals Act") estimating a cost of $29 million.[40] This estimate was based on the best data available in early 2022, and used school enrollment data, free-reduced percentage data, and USDA federal reimbursement data from the 2021-22 school year to make predictions about the cost of USMs during the 2022-23 school year. After using this data to predict the number of students participating in school meal programs whose meals would be paid for by the state of Vermont and the cost to the state of each breakfast and lunch, JFO used average daily participation rates in school meals to estimate the cost. Participation rates were the most difficult to predict and resulted in high fluctuations in expected cost; for this reason the original JFO model provided a table of possible outcomes based on differing participation rates. In early 2023, JFO used updated reimbursement rates and the participation rates reported in the Agency of Education's January 16th report – 39 percent for breakfast and 61 percent for lunch – to update the cost estimate.[41] The JFO also refined its estimate to better match the universal model by looking at the state-level percentage of free or reduced certified students and state-level school enrollment to determine the number of students participating in school meal programs whose meals would be paid for by the state of Vermont ("paid student percentage").[42] The final model for the cost of the bill, calculated separately for breakfast and lunch, is:

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The daily cost is then multiplied by 175, the standard number of days with mealtimes in the school year, to determine total annual cost. JFO originally predicted a cost of $29 million, with the actual cost ranging between $25 and $42 million depending on participation rates and the number of students certified in the free or reduced lunch program. With updated data, JFO now predicts that the cost of extending USMs for the 2022-23 school year will be approximately $26 million.

The updated cost estimate makes several improvements to the original estimate. First, the data is updated to reflect the 2022-23 school year. New participation rate data in particular has improved the precision of the cost estimate. In addition, looking at state-level free or reduced certified and enrollment data simplifies the estimate while more accurately reflecting the universal model. However, this estimate does not account for the 1.6 multiplier used to calculate federal reimbursements for schools participating in the Community Eligibility Provision (CEP). In addition to simplifying meal counts, this multiplier may increase federal reimbursements for schools whose free or reduced percentage is lower than 1.6 times the Identified Student Percentage (ISP).[43] The two cost estimates below build off of the new model used by the JFO, but account for this multiplier to consider how CEP participation may reduce costs to the state of Vermont.

7.2 COST ESTIMATE: 2022-23 SCHOOL YEAR

The JFO generously agreed to share its Universal School Meals model with the Dartmouth Policy Research Shop Universal School Meals Project Team in order to ensure consistency between this report and JFO's continual work regarding school meals. Our estimate for the 2022-23 school year employs the same model as the JFO, but accounts for the 1.6 multiplier used in meal counts for CEP schools. Since the passage of the USMA, the Agency of Education (AOE) maximized federal funding by enrolling over 20 new schools into the CEP. To incorporate these savings into the cost estimate, we drew from the AOE 21-22 Free and Reduced Eligibility Report and "Appendix A – FRL Percentage Data Fall 2022" from AOE's January 16th report: "Impact and Implementation of the Universal School Meals Act."[44] We compared school enrollment data from the first report with the updated Free and Reduced percentage data and CEP participation data from the second report to recalculate the statewide free and reduced certified percentage. For schools enrolled in CEP, we multiplied the Identified Student Percentage (ISP) by 1.6 to calculate the percentage of meals reimbursed at the free rate. We re-estimated the statewide free meal percentage to be 40 percent of meals rather than 38 percent. If average daily participation rates remain at 39 percent and 61 percent respectively for breakfast and lunch for the rest of the school year, we estimate the cost in the 2022-23 school year to be roughly $25 million. If participation rates rise to 60 and 75 percent respectively, the percentages used by the JFO in 2022 to produce a mid-range estimate, this cost will rise to $33 million.

This estimate does not differ greatly from the JFO estimate of $26 million, or the Agency of Education's recent estimate of $27 million included in their January 16th report. When considered together, these three estimates suggest that the cost of USMs will not go beyond the $29 million appropriated by the Universal School Meals Act. While this is an improved cost estimate, it still has its weaknesses. First, the paid student percentage is calculated by cross-referencing 2021-22 and 2022-23 school year data, which may reduce the accuracy of estimates. This variable is also made less precise by the exclusion of schools with data points below 11 students which are censored to protect student privacy. In addition, by treating the ISP as equal to the free or reduced percentage at non-CEP schools, we overestimated the statewide paid student percentage, thus overestimating the cost of the bill. However, we can still draw some conclusions from this estimate. The total cost of the bill will fall on the low end of the wide range established by JFO's initial estimate, and will likely not exceed the $29 million appropriated by the Universal School Meals Act.

7.3 COST ESTIMATE: 2024-25 SCHOOL YEAR

This cost estimate for the 2024-25 school year is made using the same model as the previous estimates, but considers two significant changes at the federal level which will go into effect starting in the 2024-25 school year. First, The USDA has approved the state of Vermont to participate in the Medicaid Direct Certification Pilot Program.[45] The Department of Vermont Health Access (DVHA) estimates that 33,000-37,000 students will be directly certified through Medicaid.[46] Assuming that every currently certified student would be directly certified, this pilot program will increase certification by roughly 4,000 students (this is an underestimate because it assumes perfect overlap between certified students and students participating in Medicaid). Second, the USDA recently announced its intention to release a proposed rule in July 2023 which would lower the 40 percent threshold for participation in CEP.[47] This rule change was originally proposed in the Build Back Better Agenda, where lawmakers proposed a 25 percent eligibility threshold.[48] In addition, several nonprofits call for a 25 percent threshold in their advocacy efforts.[49] According to the Urban Institute, this would increase the number of Vermont schools eligible for CEP by roughly 30 percent.[50] For the purposes of the cost estimate, we assume that the threshold will be lowered to 25 percent. We first pro-rata allocated the number of newly certified students to each school. This means that we calculated what percentage of all free and reduced-price certified students in Vermont are at each school, then assigned that same percentage of the 4,000 additional certified students to that school. We then recalculated each school's Identified Student Percentage (ISP) and assumed a 25 percent eligibility threshold (rather than the current 40 percent threshold) to designate schools as participating in CEP or not participating in CEP. From there, we were able to recalculate the paid student percentage, again considering the savings produced by the 1.6 multiplier for CEP schools. Using the same enrollment data as previous estimates, and updating federal reimbursement data based on inflation trends reported to us by JFO, we predict a cost of $22 million. If participation rates rise to 60 percent for breakfast and 75 percent for lunch, the cost would rise to roughly $30 million.

This estimate is significantly less precise than the previous estimates. First, school enrollment data, USDA federal reimbursement data, and participation rate data are all specific to the 2021-22 and 2022-

23 years, and are all subject to significant changes in the next few years. In addition, we should expect high variation on the individual-school level in the number of students directly certified through the Medicaid pilot program. Several schools close to the 25 percent ISP threshold may end up falling on the other side of the CEP-eligibility threshold than the estimate assumes. The CEP threshold may also be lowered to a number different from 25 percent. Finally, by treating the ISP as equal to the free or reduced certified percentage at non-CEP schools, this represents an overestimate of the true cost. Overall, this estimate is accurate but not precise. It is not meant to predict the actual cost of providing USMs, but rather to communicate how the cost will change in the 2024-25 school year relative to previous years. The main finding from this cost estimate is that the cost to the state of Vermont of providing USMs will decrease significantly when the two federal rule changes take effect, but that this depends on the long-term trend of participation rates.

7.4 ANALYSIS OF LONG-TERM TRENDS

The purpose of this section is to identify and describe the long-term trends which may affect the overall cost to the state of Vermont of providing USMs. This section of the report draws heavily from AOE's January 16th report, and we recommend reading this report in its entirety to learn more about AOE's implementation of the Universal School Meals Act and its expectations regarding the cost of USMs. The following factors are the most important for policymakers to consider moving forward:

- **Participation rates under USMs would likely increase over time.** If USMs were to be extended to future years, students would become more accustomed to the universal meals model and school meal stigma would likely decrease.[51] This would result in higher participation rates in school meals. Higher participation rates would increase the cost at all schools, regardless of participation in CEP or Provision II.
- **Federal policies are subject to change.** The school meal reimbursements offered for each fee category are updated each July, and may change significantly from year to year. Lower meal reimbursements in the 2022-23 school year significantly increased costs for Vermont. Meal reimbursements may increase or decrease over the years, depending on factors such as inflation and the priorities of both the USDA and the U.S. federal government at large. Specific programs such as Provision II and CEP will also evolve. For example, the Build Back Better legislation that proposed lowering the threshold for CEP to 25 percent also included a measure that increased CEP's 1.6 multiplier to 1.9 for middle and high schools and 2.5 for elementary schools.[52] While the USDA does not have the authority to change the 1.6 multiplier, new legislation on the federal level could implement this or similar measures, altering the amount of federal funding available to school food authorities.
- **Demographics are changing in the state of Vermont.** The JFO expects the percentage of students eligible for free and reduced-price meals to decrease over time, and specifically forecasts a decline from 37 percent enrollment to 35 percent enrollment.[53] This trend would increase costs for the state of Vermont. Overall student enrollment also affects the cost of school meals. While the U.S. Census Bureau reports that Vermont's population grew by 2.8 percent over the past decade, the population of children aged 17 and under declined by 9

percent.[54,55] If this trend continues, the overall cost of school meals may decline slightly, but school food authorities may face higher per-pupil expenditures.

- **Direct and indirect certification rates are subject to change.** Under the universal model, it is likely that less families will fill out free or reduced meal applications. However, Vermont's participation in the USDA Medicaid Direct Certification pilot program will significantly alleviate this concern. Nonetheless, lawmakers should expect a reduction in Medicaid direct certification in the 2028-29 school year.[56] This is because when the Medicaid redetermination process restarts after years of COVID-19 related flexibilities, the eligible population will likely fall according to the DVHA. The effect of this will not be felt until schools are re-starting their CEP cycles in the 2028-29 school year.

The factors listed above are not a complete list of those affecting cost, as unexpected factors may arise. In addition, it is too early to determine if all of these changes considered together will lead to lower or higher overall costs. Rather, this discussion is meant to indicate which factors should be considered when considering the costs associated with USMs, and what trends need to be closely monitored over future years to be prepared for every situation.

8 CONCLUSION

The purpose of this report is to advise the Vermont Committee on Education about the cost benefit analysis of further implementing USMs. After conducting elite interviews, holding focus groups, and doing an in-depth cost analysis, the report finds that USMs are the most cost effective option to seeing a tangible increase in meal participation and decrease in stigma. This is supported by the elite interviews, which concluded that USMs were a way to maximize federal funding while maintaining the benefits experienced throughout the COVID-19 pandemic. The same consensus was reached in all three focus groups, with participants showing their unwavering support for USMs and the clear impact it has had on their students. Finally, the cost analysis shows that with the new federal rules in place, USMs are a feasible choice for Vermont, especially considering the benefits they provide to all students, no matter their socioeconomic status.

APPENDIX A: CONTACTS FOR ELITE INTERVIEWS

STATE NUTRITIONAL DIRECTORS:

1. Jane McLucas (Maine):
    a. (207) 624-6880
    b. Jane.mclucas@maine.gov
2. Brittany Mally (Nevada):
    a. (775) 353-3751
    b. Bmally@agri.nv.gov
3. Rosie Krueger (Vermont):
    a. (802) 828-1589
    b. Mary.krueger@vermont.gov

GOVERNMENT AGENCIES AND OFFICES:

1. Vermont Legislature Joint Fiscal Office
    a. Julia Richter: Fiscal Analyst
        i. (802) 828-6419
        ii. Jrichter@leg.state.vt.us

APPENDIX B: ELITE INTERVIEW QUESTIONS

All Three States Nutritional Director/Supervisor Questions::

1. Certification:
    a. How have you been able to maintain/encourage certification while promoting USMs?
    b. What does the free/reduced meals application process look like?
        i. How have you altered this process to increase ease of use / accessibility? Do you know how much this cost?
    c. What students are eligible for direct certification?
    d. What have been the challenges? How time consuming or expensive has the process been?
2. Federal Funds (CEP):
    a. What has the state done to encourage participation in social welfare programs such as SNAP?
        i. How about free/reduced meal programs specifically?
        ii. Are they aware of the Community Eligibility Program (CEP)? And if so, what actions have they taken to maximize federal funds through CEP?
    b. Is there anything else you would like to add? / That we should be aware of?

Nevada School Nutrition Supervisor Specific Questions :

1. Certification:
    a. Tell me more about the online application created to certify students for free/reduced meals
    b. What was the process of developing this application and spreading it to families?
    c. Has the online application helped to increase certification?

Vermont Nutritional Director Specific Questions:

1. General:
    a. We are planning on conducting focus groups to gain more information on stigma at three middle schools in Vermont. These are the schools we are considering, do you have any recommendations regarding which schools we should reach out to?

Hunger Free Vermont Questions (Vermont Nonprofit):

1. What was the role you played in introducing USMs for 2022-23 year?
2. What was the biggest challenge in your advocacy work and getting the State Legislature to pass USMs?
3. Administrative work required for this school year – encouraging student certification and getting schools to participate in CEP (got 20 more schools to participate in the past year). What was this process like? What were the hurdles? How would the amount / nature of this administrative work change over time (if USMs were to be extended)?
4. Are you aware of the possible USDA rule change? What do you expect the threshold to be? What work will be required to take full advantage of the rule change?
5. How will the USDA Direct Medicaid Certification pilot program change the school meals process? How will it help with providing school meals? What new challenges will it present? (Both with or without USMs)
6. Is there anything else you would like to add? / That we should be aware of?

Maine Nutritional Director Specific Questions:

1. General:
    a. Why did you decide to permanently extend USMs?
2. Certification:
    a. We appreciate the online toolkit provided to increase certification. What was the process of creating these resources / how much did it cost?

Full Plates Full Potential Questions (Maine Nonprofit):

1. What was the role you played in introducing USMs for 2022-23 year?
2. What was the biggest challenge in your advocacy work and getting the State Legislature to pass USMs?
3. Encouraging student certification and getting schools to participate in CEP. What was this process like? What were the hurdles?

4. Online form/applications - how did this process work of getting one unified system?
5. Is there anything else you would like to add? / That we should be aware of?

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