



**LEGISLATIVE REPORT**

# **IMPACT AND IMPLEMENTATION OF THE UNIVERSAL SCHOOL MEALS ACT**

**Report to the House and Senate Committees on Education and on  
Appropriations, the House Committee on Ways and Means, and the Senate  
Committee on Finance**

**January 16, 2022**

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**LEADERSHIP**

**SUPPORT**

**OVERSIGHT**

**Executive Summary**

In [Act 151, Section 6](#), the General Assembly tasked the Agency of Education with assessing the impact and status of the Universal School Meals Act. Specifically, they requested that The Agency provide data on student participation rates in the universal meals program on an individual school level and, if possible, on a grade level; the relationship of federal rules to the State-funded program; and strategies for minimizing the use of State funds to identify the amount of and sources of potential long-term funding for universal school meals in Vermont.

During the first few months of School Year 2022-23, overall participation in the meal programs increased, although not by as much as the initial cost estimates expected. The AOE has identified some factors that may be temporarily suppressing participation. The number of households qualifying for free and reduced meals through applications has decreased, but some households have continued to return applications. Return of Household Income Forms has been similarly impacted. Vermont has recently been approved to participate in USDA's Medicaid Direct Certification pilot, and USDA has announced its intention to lower the threshold for participation in CEP. Together, these two factors could result in a reduced potential cost for universal meals in future years.

## Legislation

This report is submitted pursuant to [Act 151, Section 6](#), which requires that the Agency of Education (AOE) assess the status and impact of the Universal School Meals Act on or before January 15, 2023.

## Background

Please see [Legislative Report: Recommendations of the Universal Meals Task Force](#) for background on how the federal school meals programs work in Vermont, and an explanation of the Community Eligibility Provision (CEP) and Provision 2, the two federal universal meals options being used by Vermont Schools under Act 151.

## Program Implementation Summary

AOE Child Nutrition Staff and Vermont school meals program operators began work immediately after the passage of Act 151 to implement the new law. In early July 2022, the AOE issued [Memo: Implementation of Act 151](#) providing initial guidance to schools on how AOE would be interpreting and implementing Act 151. Over the summer months, AOE staff worked with the vendor for the state child nutrition claiming system to make changes to the system to allow the state to pay claims for the universal meals supplement, at a cost of \$18,670. In August, AOE provided universal meals implementation training for school food service program administrators, and provided additional trainings specific to implementing CEP and Provision 2. Over the summer months, AOE Child Nutrition Staff worked with school food authorities to determine which schools were eligible for CEP, gather required forms and paperwork, and conduct USDA-required audits of each school's direct certification numbers. Staff worked to ensure that every school that could potentially be made eligible for CEP by averaging them with higher poverty schools in their SFA was made eligible, maximizing draw down of federal funds. The remaining public schools, and some independent schools, are using Provision 2 to offer universal meals.

Over the summer and fall, AOE staff also worked to provide support to local officials to begin offering meals at Marion Cross School (Norwich) and Windham Elementary. These were the two schools that had previously used the exemption language in 16 V.S.A. § 1265 to not offer school meals through the federal programs.

The result of this work is that 92 schools are participating in CEP, 221 schools are starting new base years of Provision 2, and four schools are continuing on with prior Provision 2 cycles. Six independent schools have continued to operate pricing programs, and several other independent schools are operating non-pricing programs but did not participate in CEP or Provision 2.

USDA-required work to audit and validate the free and reduced-price meal eligibility data collected by Provision 2 schools is ongoing. This work started in Fall 2022 and has been extremely time consuming for schools and AOE staff, impacting our ability to complete USDA-required administrative reviews. AOE has requested and received a

waiver from USDA to allow more time to complete these reviews, and we have pushed some of them to next school year. This was expected to be one-time work, but with the potential for much more favorable eligibility data in School Year 23-24 due to the Medicaid direct certification pilot (discussed below), it is likely that many schools will re-do their Provision 2 base years in School Year 23-24, requiring these audits to be conducted a second time next year.

AOE also conducted a state-wide “Fill the Form” campaign in Fall 2022. This was supported by additional efforts from Hunger Free Vermont. This campaign directed households to fill out whichever form their schools provided to them. For schools in their base year of Provision 2, this was the free and reduced meal application. For all others, this was the Household Income Form (discussed later). As part of the campaign, AOE provided schools with template letters, customizable posters and social media images, and template language for newsletters and other communications. Schools had varying degrees of success with the engaging families in completing the forms, as evidenced by the application and household income form return numbers. Some schools reported being very successful in getting higher income households to return the forms, but less successful in getting low income households to return the forms.

**Data**

This section outlines participation rate, cost data, and return rates for the Free and Reduced Lunch (FRL) application and Household Income Form (HIF).

**Participation rates**

Schools have 60 days from the month end to submit their monthly meal counts to the Agency of Education. Therefore, full information is currently only available for July – October 2022.

In October 2022, average daily participation (ADP) was 50,864 for lunch and 32,452 for breakfast. This was an increase from September, when ADP was 49,456 for lunch and 29,759 for breakfast. In percentage terms, Lunch ADP for October 2022 was 60.55%, and breakfast ADP was 38.63% which are lower than the “average participation” scenario evaluated by the Joint Fiscal Office in the [fiscal note for S. 100](#) published in March 2021. These participation rates do represent an increase over Oct 2019, when ADP was 50.47% for lunch and 28.56% for breakfast.

Average Daily Participation	Oct 2019	September 2022	Oct 2022
Breakfast	28.56%	35.42%	38.63%
Lunch	50.47%	58.89%	60.55%

Once November and December information is submitted to the AOE (in February and March), we will have a better sense of whether the increase in participation from

September to October represented an ongoing increase in participation, or whether the October rates remain constant. If some of the issues suppressing participation discussed later in the report are addressed, participation rates may increase later this year, and could be expected to increase further in future years.

We do not yet have complete information on participation rates among the different categories of students (free, reduced, and paid). USDA rules allow schools to carry over prior-year free and reduced-price eligibility status for the first 30 operating days of the school year, which generally falls in Mid-October. This means that the preliminary data from the first few months of the school year do not yet show the full impact of the decline in households qualifying via application discussed in the next section. However, as would be expected, the early data do show substantial increases in the number of “paid” meals served. The data also show a decrease in the number of reduced-price and free meals served. This is most likely as a result of low-income households not returning meal applications, and moving from the free/reduced categories to the paid categories.

### **Return of Free and Reduced Lunch Applications**

One of the major variables in question this year was how many households would continue to return free and -price meal applications when meals were free. Data collected as of the last operating day of October 2022 show a drop in households qualifying via application, but that some households did continue to submit and qualify via application. Among schools who needed to collect applications this year, there was wide variation in response rates and number of households who qualified compared to 2019.

Statewide, 34.85% of students qualified for free and reduced-price price meals in October 2022, compared to 38.23% in Fall 2019. This average includes schools operating CEP. CEP schools do not collect applications, and rely on their direct certification rate multiplied by 1.6 to arrive at a free and reduced-price percentage. As of October 1, at schools operating Provision 2 in their base year, approximately 3,450 households qualified for free or reduced-price meals based on applications submitted this school year.

Some Provision 2 schools reported difficulty in getting households to return applications. For example, Albert Lawton School in Essex Westford saw their percentage of students qualifying for free and reduced price meals decrease from 23.8% in 2019 to 16.72% in 2022 - and the rest of that district saw similar drops. But nearby Colchester School District saw much smaller drops at some of their schools – virtually no change at Colchester Middle School, while Colchester High School dropped from 24.88% to 22.65%, and the elementary schools in that district had larger drops.

Data in [Appendix A](#) show individual school percentages in 2022 compared to 2019.

Some Provision 2 schools reported that many households responded to the “fill the form” campaign and submitted applications, but that the applications showed few of the

households qualified for free and reduced-price meals. Other states have reported experiencing a similar decrease in free and reduced-price eligible students.

### Return of Household Income Forms

Schools participating in CEP, or those in later years of Provision 2, are not allowed to collect free and reduced-price meal applications from households, as this data is not needed for the school meals program. However, these schools still need to report individual household information as a metric of individual student poverty, so they collect a “Household Income Form.” Direct certification information, meals application and household income information, and any carryover free and reduced-price meal eligibility information as of October 1 are combined for this metric and reported by schools to the AOE through the October census.

These numbers have fallen during the pandemic years as schools have struggled to gather this information from households. Fall 2022 shows another decline. Because Fall 2022 includes carryover eligibility going back to 2019 for those students still enrolled, it does not yet reflect the full potential impact of offering universal meals on collecting this metric of individual student poverty. These numbers reflect the challenges that CEP schools have in gathering individual student income information. On a school-wide level, this can be accounted for by the CEP multiplier, but on a student-level, the information is not available if households do not submit the Household Income Form.

Year	October 1 Low Income Data
2018-2019	36.3285%
2019-2020	35.0978%
2020-2021	34.3868%
2021-2022	34.256%
2022-2023	31.0145%

### Impact on Non-Child Nutrition Programs

Free and reduced-price meal eligibility data currently is used for a host of education program eligibilities including school and program-level eligibilities (e.g., 21<sup>st</sup> Century Learning Center program eligibility, within-district Title IA school eligibility, E-rate, etc.) and individual student eligibilities (e.g., eligibility for SAT waivers and VSAC dual enrollment and early college waivers). These data also are used to enable The Agency to comply with required education accountability reporting such as determinations of disparities between non-low-income and low-income students on student assessment measures (i.e., equity determinations). For these reasons, decreases in return rates on school meals applications and Household Income Forms impact educational programming as well, since along with direct certification through SNAP and TANF participation, these constitute the currently available metric for determining student poverty. The addition of Medicaid to the direct certification options (see below) will be

important for non-CN programs as well as CN programs, which are the focus of this report.

## Cost data

For School Year 22-23, the legislature appropriated \$29 million to fund universal meals. This was based on the mid-range of the scenarios presented by the Joint Fiscal Office estimate. As of January 2023, AOE does not expect the School Year 22-23 costs to exceed this appropriation, although we will continue to monitor this very carefully.

One way to estimate costs this year is to take October 2022 ADP and multiply it by the state-wide “paid” percentage of 65.15%. If free, reduced, and paid eligible children eat in equal proportion to their status, and participation does not increase beyond October 2022 ADP, the state will pay out \$27,156,850 for Universal Meals in School Year 22-23. If participation increases substantially after October, or paid status students eat at significantly higher percentages than free and reduced-price eligible students, then these costs would grow and additional funds could be needed. It does not seem likely that “paid” eligible students will participate at higher rates and free than reduced-price eligible students. However, it is certainly possible that participation will increase beyond October ADP.

Three factors influence the amount of state funding needed for universal meals. The first is participation. The second is the number of households who qualify for free and reduced-price meals by submitting applications at Provision 2 schools. Both of these factors have already been discussed earlier in the report. The third factor impacting cost is the difference between the federal paid and free reimbursement rates, which are updated annually in July. Act 151 ties state funding for universal meals to the difference in these rates. Potential changes to these rates were not accounted for in prior cost estimates, and should be considered going forward.

Act 151 sets the state reimbursement rate for “paid” status meals served at schools participating in universal meals (which AOE is calling the “Universal Meals Supplement”) to the difference between the federal paid and federal free reimbursement rates. This ensures that schools have the same amount of funding to produce every meal served, and follows federal requirements that the federal free reimbursement cannot be used to subsidize the cost of “paid” status meals.

Earlier estimates of the cost of universal meals used the current school year’s free and paid reimbursement rates to calculate the amount of the Universal Meals Supplement. For School Year 2021-22, the difference was \$1.57 for breakfast and \$3.18 for lunch, and those amounts were used in calculating the potential cost of Act 151. However, the federal free reimbursement rate increased substantially in July 2022, meaning that the actual per-meal universal meals supplement for School Year 2022-23 is \$1.76 for breakfast and \$3.56 for lunch.

## Implementation Status

This section outlines factors influencing participation in the Universal Meals Programs, its impact on other aspects of school nutrition programs, on PreKindergarten programs and independent schools. Vermont's participation in the Medicaid Direct Certification pilot and a potential rule change by USDA are also discussed.

## Factors Suppressing Participation

Anecdotally, SFAs have reported several issues that are having suppressing impact on meal participation in Fall 2022. These are likely short-term issues, and when they are resolved, the AOE expects to see participation increase further.

## Extra Time/Staff needed for Provision 2 Base Year meal counts

Under the COVID-19 waivers, all meals were reimbursed at the same reimbursement rate, so SFAs needed only to count the number of students taking reimbursable meals. There was no need to record the names of students taking meals. However, in School Year 2022-23, 221 schools are in their base year of Provision 2. When operating in the base year, schools do need to record the names of students who eat, so they can correctly claim the meals based on the status of those students. This means either having students enter PIN numbers or swipe IDs, or having the point of sale staff record the name of the student as they pass by. This either slows down the line or requires additional staff to keep lines shorter. This is exacerbated by the fact that participation is up overall due to universal meals, meaning more students in the line.

Slowing down the line means that students have even less time to eat as they spend more time in line. A typical lunch period in Vermont is 20-25 minutes (although there is no state required minimum time). Students eating meals at school spend part of that time in line. If the line is frequently very long, students who have the option may choose to bring meals from home so that they can use the entire lunch period to eat and socialize.

Some schools have chosen to speed up the line by moving staff from serving/kitchen duties to point of sale duties. This has meant reducing the number of food options available to students. A number of Vermont schools have reported needing to eliminate labor-intensive customizable sandwich bars or reduce the number of hot entrée options available because of a lack of staff to operate these options. Some schools have also reported having to eliminate some labor-intensive scratch made items and instead rely more on processed and pre-packaged items. This reduction in options and meal quality has likely depressed student participation, especially among students who have other options.

In Years 2-4 of Provision 2, schools can return to only recording the number of children who eat. Many schools may choose to re-do their Provision 2 base year in School Year 23-24 due to newly available Medicaid direct certification data. However, after that, we



expect to see a reduction in the time/staff required to move students through the point of sale, which could result in a further increase in student participation.

### **Meal Quality**

Staffing shortages have resulted in a reduction in meal quality in some schools during Fall 2022. School meals programs are subject to the same labor shortages among lower paid workers as the rest of the economy. Data collected by the AOE in Fall 2022 shows the median pay for the lowest price school meals program workers in Vermont in School Year 2021-22 was \$15/hour, and school meals programs have reported significant difficulties in hiring and retaining staff. Many food service directors have reported having to substitute for kitchen staff, leaving them less time for menu planning, local foods purchasing, staff training, and recipe development. In addition, as discussed above, some of the existing staff have had to be re-assigned to manage the point of sale, rather than cook or serve. School meals programs also continue to report supply chain shortages, resulting in last minute substitutions that may be of lesser quality than the planned items, or result in odd menu combinations. As a result of these challenges, AOE staff believe meal quality and variety of offerings may be somewhat lower this year. Anecdotally, the AOE and schools are hearing more concerns from students and households about the variety and quality of meals served.

### **Attendance**

As COVID-19 and other respiratory diseases continue to circulate in the state, schools may be seeing lower overall attendance rates as students stay home sick. AOE does not yet have attendance data for Fall 2022, but based on anecdotal reports, it seems likely that overall reduced attendance due to illness could be having an impact in average daily participation.

### **Other Impacts of Universal School Meals**

#### **A la carte sales**

Several school meals programs have reported that universal meals has allowed them to reduce or completely eliminate “a la carte” offerings in the cafeteria, which they previously needed to sell to support their program operations. The nutritional quality of a la carte items is subject to some federal regulation, but is generally lower than the full reimbursable meal. In addition, sales of a la carte items had been identified by schools and students as leading to unintentional identification and stigma of lower income students who couldn’t afford these offerings and could only take a reimbursable school meal. The AOE does not have full data on how many schools have reduced or eliminated a la carte sales as a result of Act 151, but at least two SFAs have reported eliminating these sales.

## P-EBT

The Federal Pandemic EBT (P-EBT) program is continuing until the end of the Public Health Emergency, and during the Summer 2023. Vermont has just received approval of our School Year 2022-23 plan. All students attending CEP and Provision 2 schools are eligible for P-EBT on days when they miss school for a COVID-19-related reason, and all of these households are eligible for Summer P-EBT. As a result, many more Vermont households will be eligible for this benefit this year. The benefit amounts to \$8.18 per day that the student misses for a COVID-19-related reason, and \$80 per student for Summer 2023.

Congress has recently created a permanent Summer EBT program starting in Summer 2024. However, unlike P-EBT, this program is not broadly available to all students at Provision 2 and CEP schools. It is instead based on individual student eligibility, so it will not be impacted by any decision to continue universal meals.

## Impact on other Child Nutrition Programs

The Summer Food Service Program (SFSP) and the Child and Adult Care Food Program (CACFP) rely on free and reduced eligibility data to establish the eligibility of sites to offer free meals to all children through open meal sites in the SFSP, and At-Risk after school suppers in the CACFP. These programs require that sites have a 50% or more free and reduced percentage to be eligible. In 2019, 91 schools met that requirement. In Fall 2022, 89 schools met that requirement. Almost all of the schools meeting this requirement now are participating in CEP, meaning the schools can rely on direct certification information multiplied by 1.6 to establish the free and reduced percentage, instead of needing to collect applications. Participation in the Fresh Fruit and Vegetable Program (FFVP) also relies on a school's free and reduced eligibility percentage, but the state has flexibility in administering this program that means there will be little impact on the number of schools eligible.

## Independent Schools

Independent schools are allowed to participate in the federal child nutrition programs as long as they are state-recognized or state-approved, and are not-for-profit. As participants in these programs, they may also choose to participate in CEP (if eligible), or Provision 2.

In Vermont, independent schools participate in the school meals programs in two ways. Some independent schools are their own School Food Authorities (SFAs). The legislature addressed these schools specifically in Act 151, providing universal meals funding only for publicly funded students attending state-approved independent schools who choose to offer universal meals. Other independent schools participate in school meals programs as sites under public school SFAs. This is allowed by USDA, as long as it's agreeable to both parties. Historically, a number of independent schools have been part of public school SFAs as sites under those SFAs. The legislature did not

explicitly address these sites in Act 151. In implementing Act 151, AOE chose to consider these sites as part of the public school SFA (and therefore eligible for universal meals supplements for all students), because the public school SFAs have taken on full responsibility for operating the school meals program at these locations.

This interpretation led to some public school SFAs adding some additional independent schools and independent PreK programs as sites under their SFAs. This made additional students eligible for the state funding under Act 151. AOE believes it would be administratively burdensome for public school SFAs to be required to treat these sites differently. It would also require some additional changes to the state's child nutrition claiming system. However, AOE would appreciate clarity from the legislature on how to handle these sites if Act 151 or similar legislation is made permanent.

In implementing Act 151, AOE staff also realized that there was a lack of clarity around how to handle claiming the universal meals supplement for publicly funded students at independent schools when the school was participating in CEP, or in a non-base year of Provision 2. In this situation, meals are claimed by percentage, rather than the individual student's status. AOE solved this issue by requiring these schools to report the number of publicly funded students compared to total enrollment, and calculating a percentage of publicly funded students, which was then applied to the paid claiming percentage to determine how many meals should receive the universal meals supplement. AOE would appreciate language clearly allowing for this solution in any future legislation.

AOE heard negative feedback from a number of independent schools, especially those that were completely ineligible for the funds because they are state-recognized and not state-approved, that they felt excluding non-publicly funded students from the universal meals supplement was unfair. In addition, some approved-independent schools expressed confusion around the requirement that they offer universal meals to all of their students in order to receive the supplement for publicly funded students in "paid" status, as they felt that the language in Act 151 was not clear on this front.

## **PreK**

As mentioned above, a few public SFAs added PreK programs within their communities as sites under their SFA. In addition, AOE interpreted "publicly funded" to include the state's universal PreK funding, which made additional PreK students at some independent schools eligible for the funding. AOE anticipates that if Act 151 or similar legislation is extended, schools would continue to add additional PreK sites, including childcare programs with PreK programs. This would cover more children, but could lead to increased state costs in the future. AOE does not have an estimate for this potential.

## **Impact on Universal Meals from Medicaid Direct Certification Pilot and Potential USDA Rule Change**

In Late December, USDA approved Vermont's application to participate in the Medicaid Direct Certification Pilot starting July 1, 2023. In addition, USDA has recently issued notice that they plan to issue a proposed rule in July 2023 (presumably going into effect

for School Year 24-25) to lower the direct certification threshold for participation in the Community Eligibility Provision from 40% to something lower. Together, these two factors will likely result in a reduced potential cost for universal meals long-term, closer to the lower end of the initial estimate range.

Under the Medicaid Direct Certification Pilot, Vermont will be able to directly certify children in Medicaid with incomes up to 130% of the federal poverty level (FPL) for free meals, and children in Medicaid with incomes up to 185% of FPL for reduced-price meals. The Department of Vermont Health Access (DVHA) estimates that they will have about 33,000 – 37,000 children ages 5-18 who fall into one of those two categories in September of 2023. Even if we assume that this includes every student already directly certified and eligible via application for free and reduced-price meals (which seems reasonable given Vermont's high Medicaid uptake), this number is higher than the number of students qualified for free and reduced-price meals in Fall 2022 (after universal meals started). This number is even slightly higher than the total number of students who qualified for free and reduced-price meals by any means in 2019 (when schools were still charging for meals). If these preliminary estimates hold true, Medicaid direct certification could eliminate the problem of households not returning applications because meals are free. This is very positive for both the cost of universal school meals, and the impact of universal school meals on our metrics of student poverty.

In addition, Medicaid direct certification combined with USDA's rule change on CEP could significantly reduce the state share of costs for universal meals by increasing our draw down of federal funds through CEP. Students who are directly certified for free meals using Medicaid (about 28,000, by DVHA's estimate) are counted towards a school's direct certification rate, used for CEP. In 2018, Vermont had 18,000 students directly certified for free meals through other methods (mostly using 3SquaresVT/SNAP). Assuming that the Medicaid number includes all of these previously directly certified students, Medicaid direct certification will result in a significant increase to our direct certification rates. This will allow many more schools to participate in CEP starting in School Year 24-25, especially if USDA lowers the threshold for participation. Higher direct certification rates will also allow us to draw down significantly more federal funds for these meals, as USDA multiplies the school's direct certification rate by 1.6 to determine the number of meals reimbursed at the free rate.

One additional factor to consider is that COVID-19-related flexibilities have meant that households have not been required to update their applications since March 2020. DVHA advises that once the Medicaid redetermination process starts again, they do expect the eligible population to fall over a period of 14 months due to various reasons. (Non-response to renewal, over income, non-response to verifications, etc.). They cannot estimate how much this will impact the direct certification for free and reduced-price school meals. This will likely not have much of an impact on School Year 23-24. This is because once each student is directly certified in July/August of 2023, they will stay directly certified for the entire school year, even if they fall off the list from DVHA later in the year. These additional directly certified students in School Year 23-24 will

allow many more schools to qualify to start CEP cycles in School Year 24-25. Once those cycles are started, they can be used for the next 4 years. This means the impacts of any reduction in Medicaid direct certification due to the end of the COVID-19-related flexibilities wouldn't be felt broadly until School Year 28-29 when schools would need to re-start those CEP cycles.

Participating in the USDA Medicaid Direct Certification Pilot is an ongoing multi-year collaboration between AOE's Federal and Education Support Programs and Data Management and Analysis divisions, the Department of Vermont Health Access, and the Agency of Digital Services.

### **Recommendations for Further Legislation**

During implementation of Act 151, the AOE found several minor areas that would benefit from clarification of legislative intent.

As mentioned above, if the legislature chooses to extend Act 151 or similar legislation, AOE would appreciate further clarity on how to handle students at independent schools in any future legislation, including PreK students.

The AOE made a decision that the universal meals supplement would not be provided for second breakfasts served within the CEP schools. Under federal rules, second breakfasts cannot be claimed at all in Provision 2 schools, so this decision provided consistency across programs. However, second breakfasts can be claimed in the CEP federally. Clarification of legislative intent would be appreciated in this area.

Future appropriations and cost estimates should take into account the fact that the difference in paid and free per-meal reimbursement from USDA will likely increase annually.

Finally, if extended, AOE will likely need additional staff support in Fall/Winter 2023 to handle the second round of Provision 2 audit work that will be associated with the 221 Provision 2 schools re-starting their Provision 2 cycles to take advantage of the higher Medicaid direct certification numbers. This will be followed by a need for additional staff support in Summer 2024 to audit and validate a new round of CEP cycles that schools will start using the new Medicaid direct certification numbers to start CEP in School Year 2024-25.

### **Analysis of Other States**

The federal COVID-19 waivers providing federal funding for universal meals ended in June 2022, after being in place for more than two years. Several states, including Vermont, had already enacted universal meals legislation and have continued to provide universal meals in School Year 2022-23. The remaining states have had to return to charging students for meals. The states that have returned to charging have anecdotally reported increased difficulty getting households to return applications and pay bills than existed prior to COVID-19, and significant increases in unpaid meal debts.

This is supported by data collected by the School Nutrition Association. According to *Education Week*:

While it's difficult to compare this year's meal debt to previous years, it's clear that school meal debt is a major challenge facing school districts and families, both of which are struggling with the rising costs of food. Among districts that do not offer free school meals districtwide, 96 percent of school nutrition directors said that meal debt has been a challenge this year, and 65 percent say it's been a significant challenge, according to the survey.

The 847 school district nutrition directors who shared information about their students' meal debt for the survey reported that, cumulatively, their districts had amassed \$19 million in unpaid meal debts. If that is extrapolated to the more than [13,000 school districts nationwide](#), that figure becomes much larger.

(Education Week. [Meal Debt Is a Growing Problem for School Districts, Survey Shows](#). accessed January 13, 2022)

Because of these challenges, several additional states have passed universal meals laws, and more are considering such legislation. California and Maine had previously passed permanent legislation. Colorado voters approved a permanent program in Fall 2022. Nevada and Massachusetts joined Vermont in providing funding for School Year 2022-23. Pennsylvania is providing free breakfast for all students in School Year 2022-23, and Connecticut provided partial year funding that is now mostly expended. Additional proposals have been introduced in several other states, including New York, New Mexico, Minnesota, Nebraska, Missouri, and South Carolina.

Among states that are offering state-funded universal meals, Vermont seems to be unique in requiring schools to maximize federal funds draw down through participation in CEP or Provision 2 in order to receive state funding. We are also somewhat unique in requiring all public schools to participate in the federal meals programs. As a result, we have higher uptake of both these options than other states funding universal meals. In addition, few other states have made universal meals funding available to independent schools.

**Appendix A – FRL Percentage Data Fall 2022 compared to Fall 2019**

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Addison Central School District	Bingham Memorial School	No	Yes	12.76%	19.75%
Addison Central School District	Bridport Central School	No	Yes	28.57%	34.85%
Addison Central School District	Mary Hogan School	No	Yes	29.17%	31.98%
Addison Central School District	Middlebury Union High School	No	Yes	20.44%	20.15%
Addison Central School District	Middlebury Union Middle School	No	Yes	22.64%	27.34%
Addison Central School District	Ripton Elementary School	No	Yes	24.45%	++
Addison Central School District	Salisbury Community School	No	Yes	47.7%	35.53%
Addison Central School District	Shoreham Elementary School	No	Yes	24%	36.96%
Addison Central School District	Weybridge Elementary School	No	Yes	++	++
Addison Northwest School District	Ferrisburgh Central School	No	Yes	20.74%	27.40%
Addison Northwest School District	Vergennes UHSD	No	Yes	14.63%	26.41%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Addison Northwest School District	Vergennes Union Elementary School	No	Yes	26.42%	31.56%
Barre Unified Union School District	Barre City Elementary and Middle School	Yes	No	83.47%	84.73%
Barre Unified Union School District	Barre Town Middle and Elementary School	No	Yes	21.64%	26.96%
Barre Unified Union School District	SEA Building	No	Yes	27.66%	Was included in other site totals
Barre Unified Union School District	Spaulding High School	No	Yes	25.54%	28.96%
Bennington-Rutland SU	Currier Memorial School	Yes	No	++	87.80%
Bennington-Rutland SU	Flood Brook School	No	Yes	13.26%	29.47%
Bennington-Rutland SU	Manchester Elementary/Middle School	No	Yes	34.51%	42.21%
Bennington-Rutland SU	Mettawee Community UD #47	No	Yes	31.34%	39.53%
Bennington-Rutland SU	Sunderland Elementary School	No	Yes	27.87%	31.33%
Bennington-Rutland SU	The Dorset School	No	Yes	15.43%	27.38%
Bishop John A. Marshall School	Bishop John A. Marshall School	No	No	20.37%	18.85%
Burlington School District	Baird	Yes	No	++	91.11%



SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Burlington School District	Burlington High School	Yes	No	51.28%	35.25%
Burlington School District	Centerpoint School	Yes	No	++	81.40%
Burlington School District	Champlain Elementary	No	Yes	31.02%	32.23%
Burlington School District	CP Smith School	No	Yes	21.69%	57.41%
Burlington School District	Edmunds Elementary	Yes	No	70.96%	49.82%
Burlington School District	Edmunds Middle School	Yes	No	58.58%	39.75%
Burlington School District	EEE	Yes	No	++	94.44%
Burlington School District	Flynn Elementary	Yes	No	64.4%	66.97%
Burlington School District	Hunt Middle School	Yes	No	62.61%	69.77%
Burlington School District	Integrated Arts Academy at HOWheeler Elementary	Yes	No	80%	74.65%
Burlington School District	King Street Youth Center	Yes	No	++	++
Burlington School District	ONTOP School	Yes	No	++	87.72%
Burlington School District	Sustainability Academy at Lawrence Barnes	Yes	N	81.23%	87.13%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Burlington School District	Trinity Preschool	No	Yes	++	Did not participate
Burlington School District	Youth Build	Yes	N	++	++
Burr and Burton Academy	Burr and Burton Academy	No	Yes	13%	18.32%
Burr and Burton Academy	Mountain Campus	No	Yes	++	Did not participate
Caledonia Central SU	Barnet Elementary School - OPEN	No	Yes	37.5%	32.24%
Caledonia Central SU	Cabot School	No	Yes	42.26%	45.12%
Caledonia Central SU	Danville School - OPEN	No	Yes	23.35%	32.55%
Caledonia Central SU	Peacham Elementary School	No	Yes	16.67%	18.46%
Caledonia Central SU	Twinfield Union School	No	Yes	37.18%	40.00%
Caledonia Central SU	Walden School	No	Yes	38.03%	48.68%
Caledonia Central SU	Waterford Elementary School - OPEN	No	Yes	21.15%	37.58%
Central Vermont Supervisory Union	Northfield Elementary School	No	Yes	8.78%	37.96%
Central Vermont Supervisory Union	Northfield Middle High School	No	Yes	4.66%	39.42%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Central Vermont Supervisory Union	Orange Center School	No	Yes	28.58%	46.58%
Central Vermont Supervisory Union	Washington Village School	No	Yes	30.17%	45.22%
Central Vermont Supervisory Union	Williamstown Elementary School	No	Yes	32.41%	51.97%
Central Vermont Supervisory Union	Williamstown Middle/High School	No	Yes	33.45%	47.03%
Champlain Valley Unified Union School District	Allen Brook School	No	Yes	5%	Did not participate
Champlain Valley Unified Union School District	Champlain Valley UHSD	No	Yes	8.54%	11.52%
Champlain Valley Unified Union School District	Charlotte Central School	No	Yes	4.26%	8.36%
Champlain Valley Unified Union School District	Hinesburg Community School	No	Yes	12.14%	22.62%
Champlain Valley Unified Union School District	Jean Garvin School	No	Yes	30.56%	++
Champlain Valley Unified Union School District	Shelburne Community School	No	Yes	9.63%	12.67%
Champlain Valley Unified Union School District	Williston Central School	No	Yes	9.73%	12.98%
Christ the King School	Christ the King School	No	N	++	6.25%

<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Colchester Town School District	Colchester High School	No	Yes	22.65%	24.88%
Colchester Town School District	Colchester Middle School	No	Yes	27.57%	27.49%
Colchester Town School District	Malletts Bay School	No	Yes	29.35%	34.01%
Colchester Town School District	Porters Point School	No	Yes	21.27%	29.25%
Colchester Town School District	Union Memorial School	No	Yes	27.35%	35.27%
Essex North SU	Canaan Schools	No	Yes	30.33%	34.36%
Essex Westford School District	Albert D. Lawton School	No	Yes	16.72%	23.78%
Essex Westford School District	Essex Elementary School	No	Yes	15.65%	18.43%
Essex Westford School District	Essex Middle School	No	Yes	18.96%	18.88%
Essex Westford School District	Essex UHSD	No	Yes	15.58%	24.50%
Essex Westford School District	Founders Memorial School	No	Yes	16.28%	20.20%
Essex Westford School District	Hiawatha School	No	Yes	23.66%	17.62%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Essex Westford School District	Summit Street School	No	Yes	20%	29.07%
Essex Westford School District	Thomas Fleming School	No	Yes	23.45%	21.88%
Essex Westford School District	Westford Elementary School	No	Yes	14.84%	16.77%
Franklin Northeast SU	Bakersfield Elementary School	Yes	No	40.27%	38.85%
Franklin Northeast SU	Berkshire Elementary School	Yes	No	60.19%	41.05%
Franklin Northeast SU	Enosburg Elementary School	Yes	No	72%	64.66%
Franklin Northeast SU	Enosburg Middle/High School	No	Yes	47.01%	41.37%
Franklin Northeast SU	Montgomery Elementary	No	Yes	37.01%	46.15%
Franklin Northeast SU	Richford Elementary School	Yes	No	++	97.93%
Franklin Northeast SU	Richford High School	Yes	No	81.09%	71.19%
Franklin Northeast SU	Sheldon Elementary School	Yes	No	38.21%	35.71%
Franklin West SU	Bellows Free Academy - Fairfax	No	Yes	18.03%	21.21%
Franklin West SU	Fletcher Elementary School	No	Yes	19.84%	30.77%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Franklin West SU	Georgia Elementary and Middle School	No	Yes	19.3%	20.76%
Grace Christian School	Grace Christian School	No	Yes	37.75%	Did not participate
Grand Isle SU	Alburgh Community Education Center	Yes	No	80.4%	78.85%
Grand Isle SU	Folsom Education & Community Center	No	Yes	8.51%	10.08%
Grand Isle SU	Grand Isle School	Yes	No	42.74%	21.60%
Grand Isle SU	North Hero School	No	Yes	++	17.65%
Greater Rutland County Supervisory Union	Middletown Springs Elementary School	No	Yes	37.5%	43.33%
Greater Rutland County Supervisory Union	Poultney Elementary School	No	Yes	35.19%	45.74%
Greater Rutland County Supervisory Union	Poultney High School	No	Yes	37.77%	43.20%
Greater Rutland County Supervisory Union	Proctor Elementary School	No	Yes	45.72%	49.07%
Greater Rutland County Supervisory Union	Proctor Jr./Sr. High School	No	Yes	32.26%	34.65%
Greater Rutland County Supervisory Union	Rutland Town School	No	Yes	13.43%	21.79%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Greater Rutland County Supervisory Union	Wells Village School	No	Yes	47.56%	55.21%
Greater Rutland County Supervisory Union	West Rutland Elementary School	No	Yes	47.4%	48.96%
Hartford Town School District	Dothan Brook School	No	Yes	28.09%	26.34%
Hartford Town School District	Hartford High School	No	Yes	20.93%	25.58%
Hartford Town School District	Hartford Middle School	No	Yes	34.47%	31.66%
Hartford Town School District	Ottauquechee School	No	Yes	18%	27.47%
Hartford Town School District	Regional Alternative Program	No	Yes	++	65.00%
Hartford Town School District	White River School	No	Yes	44.44%	52.26%
Harwood Unified Union School District	Brookside Primary School	No	Yes	11.97%	15.02%
Harwood Unified Union School District	Crossett Brook Middle School	No	Yes	11.11%	16.78%
Harwood Unified Union School District	Fayston Elementary	No	Yes	++	++
Harwood Unified Union School District	Harwood Union High School	No	Yes	13.47%	19.84%

<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Harwood Unified Union School District	Moretown Elementary School	No	Yes	10.24%	18.39%
Harwood Unified Union School District	Waitsfield Elementary School	No	Yes	17.16%	17.86%
Harwood Unified Union School District	Warren Elementary School	No	Yes	16.79%	25.00%
Kingdom East Supervisory District	Burke School	No	Yes	27.13%	42.92%
Kingdom East Supervisory District	Concord School	Yes	No	65.58%	48.21%
Kingdom East Supervisory District	Lunenburg School	No	Yes	46.15%	47.76%
Kingdom East Supervisory District	Lyndon Town School	No	Yes	41.64%	53.74%
Kingdom East Supervisory District	Miller's Run USD #37	No	Yes	45.39%	63.64%
Kingdom East Supervisory District	Newark School	No	Yes	38.34%	67.16%
Kingdom East Supervisory District	Sutton Village School	No	Yes	36.8%	51.76%
Lamoille North SU	Cambridge Elementary School	No	Yes	20.63%	30.64%
Lamoille North SU	Eden Central School	Yes	N	70.51%	57.43%



SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Lamoille North SU	Hyde Park Elementary School	No	Yes	27.56%	42.32%
Lamoille North SU	Johnson Elementary School	Yes	No	64.14%	48.20%
Lamoille North SU	Lamoille UHS #18	No	Yes	27.83%	38.88%
Lamoille North SU	Waterville Elementary School	No	Yes	31.06%	42.05%
Lamoille South Unified Union School District	East Meadow School	No	Yes	++	Did not participate
Lamoille South Unified Union School District	Elmore School	No	Yes	++	Did not participate
Lamoille South Unified Union School District	Morristown Elementary School	No	Yes	35.6%	51.26%
Lamoille South Unified Union School District	Peoples Academy	No	Yes	21.79%	36.36%
Lamoille South Unified Union School District	Stowe Elementary School	No	Yes	9.16%	11.30%
Lamoille South Unified Union School District	Stowe Middle/High School	No	Yes	6.8%	11.68%
Laraway School, Inc.	Laraway School	Yes	No	++	++
Lyndon Institute	Lyndon Institute	No	Yes	29.75%	31.75%
Maple Run Unified School District	Bellows Free Academy USD	No	Yes	20.13%	25.70%

<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Maple Run Unified School District	Fairfield Center School	No	Yes	17.42%	34.73%
Maple Run Unified School District	SOAR Learning Center	Yes	No	78.43%	95.89%
Maple Run Unified School District	St. Albans City Elementary School	Yes	No	83.12%	83.31%
Maple Run Unified School District	St. Albans Town Educational Center	No	Yes	20.85%	27.32%
Mill River Unified Union School District	Clarendon Elementary School	No	Yes	41.92%	45.36%
Mill River Unified Union School District	Mill River Union High School	No	Yes	28.5%	33.41%
Mill River Unified Union School District	Shrewsbury Elementary School	No	Yes	38.16%	30.14%
Mill River Unified Union School District	Tinmouth Elementary School	No	Yes	36.62%	49.15%
Mill River Unified Union School District	Wallingford Elementary School	No	Yes	39.03%	36.97%
Milton Town School District	Milton Elementary School	No	Yes	28.63%	38.21%
Milton Town School District	Milton High School	No	Yes	27.45%	32.78%
Milton Town School District	Milton Middle School	No	Yes	18.33%	Was included in other site totals

<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Missisquoi Valley School District	Franklin Elementary School	No	Yes	37.93%	37.62%
Missisquoi Valley School District	Highgate Elementary School	No	Yes	31.75%	40.86%
Missisquoi Valley School District	Missisquoi Valley Union High School	No	Yes	35.49%	39.55%
Missisquoi Valley School District	Swanton Elementary School	No	Yes	44.07%	45.63%
Montpelier Roxbury Supervisory Union	Main Street Middle School	No	Yes	17.71%	21.11%
Montpelier Roxbury Supervisory Union	Montpelier High School	No	Yes	11.11%	17.22%
Montpelier Roxbury Supervisory Union	Roxbury Village	No	Yes	24.14%	46.94%
Montpelier Roxbury Supervisory Union	Union Elementary School	No	Yes	18.87%	18.05%
Mount Mansfield Unified Union School District	Brewster Pierce Memorial School	No	Yes	15.45%	21.80%
Mount Mansfield Unified Union School District	Browns River Middle School	No	Yes	6.22%	11.08%
Mount Mansfield Unified Union School District	Camels Hump Middle School	No	Yes	10%	15.71%
Mount Mansfield Unified Union School District	Jericho Elementary	No	Yes	3.27%	10.56%

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Mount Mansfield Unified Union School District	Mt. Mansfield Union High School	No	Yes	7.63%	8.39%
Mount Mansfield Unified Union School District	Richmond Elementary School	No	Yes	10.6%	14.53%
Mount Mansfield Unified Union School District	Smilie Memorial School	No	Yes	19.48%	16.13%
Mount Mansfield Unified Union School District	Underhill Central School	No	Yes	8.49%	12.32%
Mt. Abraham Unified School District	Beeman Elementary School	No	Yes	24.05%	40.51%
Mt. Abraham Unified School District	Bristol Elementary School	No	Yes	32.73%	36.43%
Mt. Abraham Unified School District	Lincoln Community School	No	Yes	23.95%	22.86%
Mt. Abraham Unified School District	Monkton Central School	No	Yes	20.63%	21.64%
Mt. Abraham Unified School District	Mt. Abraham Middle/High School	No	Yes	22.54%	27.94%
Mt. Abraham Unified School District	Robinson Elementary School	No	Yes	26.71%	34.38%
Mt. Abraham Unified School District	Starksboro Cooperative Preschool	No	Yes	++	Did not participate
New England Kurn Hattin Homes	New England Kurn Hattin Homes	No	No	++	++

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
North Country SU	Brighton Elementary School	Yes	No	64.26%	48.36%
North Country SU	Charleston Elementary School	Yes	No	82.46%	57.76%
North Country SU	Coventry Village School	Yes	No	81.95%	47.14%
North Country SU	Derby Elementary School	Yes	No	57.63%	46.84%
North Country SU	Jay School District	Yes	No	42.11%	34.43%
North Country SU	Lowell Graded School	Yes	No	77.3%	66.67%
North Country SU	Newport City Elementary School	Yes	No	++	71.00%
North Country SU	Newport Town School	Yes	No	76.53%	63.89%
North Country SU	North Country Union High School	Yes	No	54.67%	34.87%
North Country SU	North Country Union Junior High School	Yes	No	69.14%	44.80%
North Country SU	Troy Elementary School	Yes	No	70%	65.15%
Northeastern Family Institute	Arlington School	Yes	No	++	Did not participate
Northeastern Family Institute	Cornerstone School	Yes	No	++	Did not participate

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Northeastern Family Institute	Turning Points School	Yes	No	++	++
Norwich School District	Marion Cross School	No	Yes	++	Did not participate
Orange East SU	Blue Mountain Union School	No	Yes	44.55%	56.54%
Orange East SU	Bradford Elementary School	No	Yes	32.35%	50.79%
Orange East SU	Newbury Elementary School	No	Yes	38.15%	45.80%
Orange East SU	Oxbow UHSD #30	No	Yes	35%	49.69%
Orange East SU	Thetford Elementary School	No	Yes	13.52%	19.59%
Orange East SU	Waits River Union #36	No	Yes	53.08%	57.26%
Orange Southwest Unified Union School District	Braintree School	No	Yes	40.81%	41.59%
Orange Southwest Unified Union School District	Brookfield Elementary School	No	Yes	18.07%	26.58%
Orange Southwest Unified Union School District	Randolph Elementary School	No	Yes	45.05%	47.75%

<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Orange Southwest Unified Union School District	Randolph Union High School	No	Yes	38.38%	38.17%
Orleans Central SU	Albany Community School	Yes	No	77.3%	88.18%
Orleans Central SU	Barton Graded School	Yes	No	91.98%	81.88%
Orleans Central SU	Brownington Central School	Yes	No	61.28%	81.65%
Orleans Central SU	COFEC Headstart	Yes	No	78.14%	90.57%
Orleans Central SU	Glover Community School	Yes	No	42.18%	29.90%
Orleans Central SU	Irasburg Village School	Yes	No	63.73%	45.99%
Orleans Central SU	Lake Region UHS	Yes	No	47.46%	45.90%
Orleans Central SU	Orleans Elementary	Yes	No	82.21%	82.57%
Orleans Southwest SU	Craftsbury Academy	No	Yes	30.34%	45.33%
Orleans Southwest SU	Craftsbury Elementary	No	Yes	28.21%	34.78%
Orleans Southwest SU	Hardwick Elementary School	No	Yes	53.57%	58.43%
Orleans Southwest SU	Hazen Union High School	No	Yes	44.11%	43.14%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Orleans Southwest SU	Lakeview Union USD #43	No	Yes	45%	65.22%
Orleans Southwest SU	Wolcott Elementary School	No	Yes	41.82%	48.60%
Orleans Southwest SU	Woodbury Elementary School	No	Yes	39.59%	30.43%
Rice Memorial High School	Rice Memorial High School	No	No	9.92%	9.09%
Rivendell Interstate School District	Rivendell Academy	No	Yes	29.87%	33.00%
Rivendell Interstate School District	Samuel Morey Elementary School	No	Yes	25.42%	31.40%
Rivendell Interstate School District	Westshire Elementary	No	Yes	40%	54.84%
Rutland City School District	AEP on Grove Street	Yes	No	++	Did not participate
Rutland City School District	Allen Street Campus	Yes	No	++	++
Rutland City School District	Christ the King School	Yes	No	++	8.59%
Rutland City School District	Northeast Elementary School	Yes	No	81.98%	71.22%
Rutland City School District	Northwest Elementary School	Yes	No	++	++



SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Rutland City School District	Pierpoint Primary Learning Center	Yes	No	++	++
Rutland City School District	Rutland Intermediate/Middle School	Yes	No	91.6%	73.41%
Rutland City School District	Rutland Senior High School	Yes	No	46.78%	34.11%
Rutland Northeast SU	Barstow Unified Union School District - Barstow Memorial School	No	Yes	12.04%	25.00%
Rutland Northeast SU	Otter Creek Academy - Leicester	No	Yes	42.2%	61.29%
Rutland Northeast SU	Otter Valley UUSD - Lothrop School	No	Yes	25.27%	40.57%
Rutland Northeast SU	Otter Valley UUSD - Neshobe Elementary School	No	Yes	40.09%	52.48%
Rutland Northeast SU	Otter Valley UUSD - Otter Valley Union High School	No	Yes	26.22%	33.87%
Slate Valley Unified Union School District	Benson Village School	Yes	No	81.12%	43.48%
Slate Valley Unified Union School District	Castleton Elementary School	No	Yes	35.24%	35.24%
Slate Valley Unified Union School District	Fair Haven Grade School	Yes	No	64.54%	42.65%
Slate Valley Unified Union School District	Fair Haven Union High School	No	Yes	36.34%	36.34%

<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Slate Valley Unified Union School District	Orwell Village School	No	Yes	40.88%	40.88%
South Burlington Town School District	F.H. Tuttle Middle School	No	Yes	17.49%	21.44%
South Burlington Town School District	South Burlington Central School	No	Yes	17.66%	16.93%
South Burlington Town School District	South Burlington Chamberlin School	No	Yes	23.6%	34.07%
South Burlington Town School District	South Burlington High School	No	Yes	12.92%	15.64%
South Burlington Town School District	South Burlington Orchard School	No	Yes	16.05%	21.68%
Southwest Vermont SU	Arlington Memorial High School	Yes	No	41.74%	49.27%
Southwest Vermont SU	Bennington Elementary School	Yes	No	++	++
Southwest Vermont SU	Early Education Program	Yes	No	++	91.67%
Southwest Vermont SU	Fisher Elementary School	Yes	No	56.19%	42.31%
Southwest Vermont SU	Molly Stark School	Yes	No	++	++
Southwest Vermont SU	Monument Elementary School	Yes	No	64%	67.18%
Southwest Vermont SU	Mount Anthony Union Middle School	Yes	No	89.41%	74.08%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Southwest Vermont SU	Mt. Anthony UHS #14	Yes	No	70.42%	53.30%
Southwest Vermont SU	OnPoint Elementary at Congress St.	Yes	No	++	++
Southwest Vermont SU	Pownal Elementary School	Yes	No	++	96.33%
Southwest Vermont SU	Sacred Heart School	Yes	No	23.12%	19.12%
Southwest Vermont SU	Shaftsbury Elementary School	Yes	No	54.64%	53.42%
Southwest Vermont SU	Woodford Hollow School	Yes	No	++	++
Springfield Town School District	Elm Hill School	Yes	No	71.38%	57.08%
Springfield Town School District	Riverside Middle School	Yes	No	82.56%	52.54%
Springfield Town School District	Springfield High School	Yes	No	52.1%	44.56%
Springfield Town School District	Union Street School	Yes	No	75.07%	56.43%
St. Francis Xavier	St. Francis Xavier School	No	No	8.46%	15.08%
St. Johnsbury Academy	St. Johnsbury Academy	No	Yes	9.44%	29.10%
St. Johnsbury Town School District	The St. Johnsbury School	Yes	No	69.84%	75.08%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
The Compass School	The Compass School	No	Yes	58.33%	43.75%
The Village School of North Bennington	The Village School of North Bennington	No	Yes	20.14%	29.85%
Thetford Academy	Thetford Academy	No	No	10.29%	Did not participate
Two Rivers SU	Cavendish Elementary School	No	Yes	41.77%	43.75%
Two Rivers SU	Chester-Andover USD#29	Yes	No	64.83%	41.63%
Two Rivers SU	Green Mountain UHSD #35	No	Yes	32.73%	32.37%
Two Rivers SU	Ludlow Elementary	No	Yes	38.89%	45.28%
Two Rivers SU	Mt. Holly Elementary	No	Yes	24.55%	37.50%
United Christian Academy	United Christian Academy	No	No	42.65%	40.00%
Vermont Achievement Center	Vermont Achievement Center	Yes	No	++	++
VT Organization for Jewish Education	Tamim Academy	No	No	26.32%	Did not participate
Washington Central Unified Union School District	Berlin Elementary School	No	Yes	34.54%	56.80%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Washington Central Unified Union School District	Calais Elementary School	No	Yes	18.09%	36.46%
Washington Central Unified Union School District	Doty Memorial School	No	Yes	23.68%	48.48%
Washington Central Unified Union School District	East Montpelier Elementary School	No	Yes	14.66%	25.93%
Washington Central Unified Union School District	Rumney Memorial School	No	Yes	16.26%	25.00%
Washington Central Unified Union School District	U-32 Middle/High School	No	Yes	20.44%	26.25%
Washington County Mental Health Services Inc.	Choice Academy	Yes	No	++	88.89%
White River Valley Supervisory Union	Bethel School	No	Yes	33.07%	42.81%
White River Valley Supervisory Union	Chelsea Public School	No	Yes	19.15%	42.14%
White River Valley Supervisory Union	Newton Elementary School	No	Yes	16.44%	33.96%
White River Valley Supervisory Union	Rochester School	No	Yes	22.92%	56.19%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
White River Valley Supervisory Union	Sharon Elementary School	No	Yes	25.3%	42.86%
White River Valley Supervisory Union	South Royalton School	No	Yes	23.1%	39.31%
White River Valley Supervisory Union	Stockbridge Central School	No	Yes	28%	46.51%
White River Valley Supervisory Union	Tunbridge Central School	No	Yes	17.76%	43.56%
Windham Central SU	Dover Elementary School	No	Yes	23.86%	45.56%
Windham Central SU	Jamaica Village School	Yes	No	++	45.95%
Windham Central SU	Leland & Gray High School	No	Yes	31.87%	24.16%
Windham Central SU	Marlboro Elementary School	No	Yes	36.47%	36.36%
Windham Central SU	Newbrook Elementary School	No	Yes	37.5%	33.33%
Windham Central SU	Townshend Elementary School	No	Yes	38.46%	42.86%
Windham Central SU	Wardsboro Central School	No	Yes	37.5%	26.09%
Windham Central SU	Windham Elementary School	No	Yes	++	Did not participate
Windham Northeast SU	Athens Grafton School	Yes	No	++	59.57%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Windham Northeast SU	Bellows Falls Middle School	Yes	No	58.18%	51.55%
Windham Northeast SU	Bellows Falls UHS#27	No	Yes	49.23%	36.16%
Windham Northeast SU	Central Elementary School	Yes	No	76.98%	72.50%
Windham Northeast SU	Saint Michael's Catholic School	No	Yes	23.2%	26.00%
Windham Northeast SU	Saxtons River Elementary	Yes	No	60.48%	53.66%
Windham Northeast SU	Westminster Center School	No	Yes	33.33%	59.30%
Windham Southeast SU	Academy School	Yes	No	64.77%	79.17%
Windham Southeast SU	Brattleboro UHS #6	No	Yes	32.86%	32.84%
Windham Southeast SU	Dummerston School	No	Yes	14.48%	28.75%
Windham Southeast SU	Green Street School	Yes	No	71.38	90.83%
Windham Southeast SU	Guilford Central School	No	Yes	20.16	39.66%
Windham Southeast SU	Oak Grove School	Yes	No	67.49	70.15%
Windham Southeast SU	Putney Central School	Yes	No	61.26	46.63%
Windham Southeast SU	Vernon Elementary School	No	Yes	34.15	41.60%

SFA Name	Site Name	SY 22-23 CEP	SY 22-23 Provision 2	% Fall 2022 Free and Reduced	% Fall 2019 Free and Reduced
Windham Southwest SU	Halifax School	No	Yes	57.81	42.11%
Windham Southwest SU	Readsboro Central School	No	Yes	30.77	31.58%
Windham Southwest SU	Stamford Elementary School	No	Yes	23.29	22.09%
Windham Southwest SU	Twin Valley Elementary School	No	Yes	47.45	58.85%
Windham Southwest SU	Twin Valley Middle/High School	No	Yes	37.11	56.84%
Windsor Central SU	Barnard Central School	No	Yes	++	++
Windsor Central SU	Killington Elementary School	No	Yes	12.61	22.22%
Windsor Central SU	Prosper Valley School	No	Yes	15.22	Was included in other site totals
Windsor Central SU	Reading Elementary School	No	Yes	++	29.73%
Windsor Central SU	Woodstock Elementary School	No	Yes	10.85	24.10%
Windsor Central SU	Woodstock Union Middle/High School	No	Yes	9.65	18.76%
Windsor County Youth Services	Mountain Side House	No	No	++	++
Windsor Southeast SU	Albert Bridge School	No	Yes	++	26.23%



<b>SFA Name</b>	<b>Site Name</b>	<b>SY 22-23 CEP</b>	<b>SY 22-23 Provision 2</b>	<b>% Fall 2022 Free and Reduced</b>	<b>% Fall 2019 Free and Reduced</b>
Windsor Southeast SU	Hartland Elementary School	No	Yes	19.45	47.83%
Windsor Southeast SU	Weathersfield School	No	Yes	14.28	33.90%
Windsor Southeast SU	Windsor School	No	Yes	20	32.69% and 37.20%
Winooski School District	Winooski Schools	Yes	No	96.13	97.96%