

TESTIMONY

Testimony To: House Committee on Appropriations

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Subject: Universal School Meals

Date: April 13, 2022

The Committee has asked for an update on school meals programs as it prepares to consider S.100, legislation relating to state funding for universal school meals. Along with this brief written testimony, I will also refer the Committee to the [Recommendations of the School Meals Task Force](#) report, which includes background information on how school meals have been paid for in the past, considerations for moving to a universal school meals model, and recommendations for the legislature to consider if they decide to move forward with state-wide universal school meals.

School Meals During COVID-19

During COVID-19, Vermont schools have been able to offer free school meals to all students, using waivers and funding provided by USDA, the federal agency responsible for implementation of the National School Lunch Program (NSLP) and School Breakfast Program (SBP). USDA's authority to issue these waivers expires June 30, 2022, unless Congress acts to extend the authority. Barring federal action, school meals programs will need to return to normal operation at the start of School Year 22-23.

Normal School Meals Operation

Within the NSLP and SBP, schools have several options for continuing to offer free meals to all students (known as universal school meals) – however these options require a source of non-federal funds to cover the cost of some meals. Prior to COVID-19, 77 Vermont schools offered universal school meals using these options. If the school meals program does not have a source of non-federal funding to cover the cost of these meals, they must return to operating a “pricing program.”

Under a pricing program, students qualify for free meals if their parents/guardians submit [an application](#) showing that the household is under 130% of the federal poverty level, or if the student is directly certified for free school meals because their household participates in 3SquaresVT/SNAP, or Reach Up/TANF, or if the student is state-placed foster, homeless, migrant, runaway, or participates in a Head Start program. If the parent/guardian submits an application showing that the household is between 130-185% of the federal poverty level, the student qualifies for reduced price meals. In Vermont, the state pays for the student's share of reduced-price meals, so meals are free to reduced-price eligible students. All other students are

considered “paid” status, and may purchase meals. Meals for “paid” students are subsidized by the federal government, but cost the student around \$3.31 for lunch and \$1.97 for breakfast.

Need for a Household Income Form

Information about individual students’ eligibility for free and reduced price school meals has long been used as a metric of student poverty throughout the education system. Under the universal school meals options that schools may utilize in future years (whether or not state funding is provided), school meals programs are not allowed to collect school meals applications every year, per federal regulation. An alternative metric of student poverty is needed for these schools.

The Agency of Education (AOE) currently provides a basic template [Household Income Form](#), which may be used by schools who cannot collect school meals applications. However, USDA funding may not be used for this purpose, as the form is not needed for the federal child nutrition programs. As a result, there is no staff support at the Agency to assist schools with their process around providing the forms to households, collecting the information in a secure manner, and processing and interpreting the data. There is also currently no process for ensuring the accuracy of data collected on the forms, as there is with the free and reduced meal applications. Offering an online version of the form that can be submitted securely and electronically, and offering translations into the many languages spoken by Vermont households have both been identified as necessary steps to ensuring that the form collects equivalent data to that previously collect by the school meals application.

Funding Needs in S.100 and S.287

JFO has completed a [fiscal note](#) on the costs to the education fund to fund universal school meals state-wide in S. 100. The AOE agrees with the assumptions made by JFO in developing that estimate.

Both S.100, the universal meals legislation, and S.287, pupil weighting legislation, currently include a switch to using a household income form (called a Universal Income Declaration in the legislation) as a metric of student poverty. If either bill is signed into law, the AOE will need resources to support implementing this form state-wide. This support includes 2 permanent employees to manage development, maintenance, translation, and training around the household income form, as well as manage the development and maintenance of an electronic version of the form. Additional implementation costs are also needed to contract with a vendor to provide the electronic form. Both bills currently include \$200,000 for these costs. The AOE is currently working with the Agency of Digital Services to get a more accurate estimate for this work. Finally, both S.100 and S.287 include 3 permanent employees at AOE to provide financial and data analysis related to the new metric.

S.100 currently only requires and funds universal school meals state-wide for School Year 22-23, however the provisions around the household income form are permanent. This is because it is likely that even if continued state funding is not identified, many districts will decide to implement universal meals using local funding, as they are reluctant to return to charging for meals after the COVID-19 waivers expire.