

AOE Testimony: S.100 – Universal/Local School Meals

Testimony To: Senate Education Committee

Respectfully Submitted by: Daniel M. French, Secretary, Agency of Education

Date: March 9, 2021

Thank you for the opportunity to testify on this bill.

Local Foods

The local foods incentive portion of the bill, as passed out of Senate Agriculture, is workable to the AOE, but we do not think this is the most efficient way to incentivize local foods purchasing because it requires significant additional administrative work to set up and manage a special grant program.

Our suggestion would be to simply provide additional funds to all schools on a per-plate basis, like we currently do with state-match funding. We expect many schools would use the additional funds for local purchasing even without the stipulation that they do so. Others would use the funds to strengthen their programs in other ways.

We believe that we can implement the program as written, within the timeline, and with the staffing resources included the bill. Without the staffing resources, this would be very difficult.

Universal Meals

While the AOE is generally supportive of Universal Meals, we have had two major concerns with this bill: funding, and data.

Funding

Federal funding for school meals is partially based on the number of households who qualify for free and reduced-price meals. We determine this rate through an application process. We are concerned that many households will not submit applications if they do not need to do so to receive free meals, which would adversely impact our reimbursement rate.

AOE's estimate of the cost of the bill is higher than the hunger advocates because we have calculated the "worst case" scenario of all students eating every day, and no households returning applications. We would still receive some federal funding because some households are directly certified for free meals because they participate in 3SquaresVT and ReachUp. However, if our free and reduced percentages were based on just those households, the state would move from approximately 35-40% of our students qualifying for free and reduced-price meals, to 25% of our students qualifying.

AOE's estimate of the cost to provide universal meals statewide has been around \$50 million per year after all schools moved to universal meals. We understand that JFO is discounting the

cost of schools who already provide free meals from their estimate, so their high-end estimate of additional cost of bill will likely come in slightly lower than AOE's estimate.

The true cost will likely be somewhere in the range between "best case" and "worst case" as some households likely will still submit applications, and some students likely will not eat. However, we urge legislators to understand the full cost if all students ate and no households returned applications.

Data

Free and reduced-priced meals percentages are used as a proxy for student poverty throughout the educational system. AOE is concerned that if households have no incentive to return applications, it will have many impacts on other programs – both within child nutrition and beyond.

We are prohibited by USDA from requiring households to submit free and reduced meal applications. Schools may collect an alternative household income form instead, but success in collecting that form varies widely from school to school.

Within child nutrition programs, lower free and reduced percentages could impact a school's ability to offer summer meals, after school meals, and to participate in the fresh fruit and vegetable program.

Outside of the child nutrition programs, free and reduced data is used for allocation of federal funding within the Title Programs, and assessment of achievement under ESSA, E-Rate, among many other uses.

The AOE has an internal working group looking for an alternative metric of student poverty that could be used instead, but that group has not yet found a solution. Other states are in a similar position. We are committed to continuing to look for a solution to this issue, but it will take time to do this properly. Rushing to universal meals without appreciating the full impact on other programs from a data perspective could hurt Vermont's ability to receive federal funding in other areas.

Finally, both portions of the bill require significant work from AOE. The bill currently has 1 new position for Child Nutrition Programs. Without this new position, we would be unable to do the work required by the bill.