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The Impact of the Healthy, Hunger-Free Kids Act of 2010 on National School Meal Participation Rates

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The Impact of the Healthy, Hunger-Free Kids Act of 2010 on National School Meal Participation Rates

Abstract

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 is the most recent child nutrition reauthorization bill. It authorizes \$4.5 billion in new funding for the United States Department of Agriculture (USDA)'s core child nutrition programs, including the National School Lunch Program and School Breakfast Program. Public focus and attention with regard to the HHFKA has chiefly been focused on the dramatic changes implemented in nutritional requirements for all food served in schools, including new restrictions on the amount of calories, sugar, fat and sodium in school meals. Nutrition advocates have lauded these efforts to address rising rates of childhood obesity, but school meal professionals are concerned with the financial cost of implementing these new standards. Their concerns stem from the question of whether the HHFKA has reduced children's participation in both school meal and a la carte programs, thereby reducing revenues for many school districts, as well as from the fact that the increase in federal reimbursement rates for these meals does not fully cover the cost of implementing the new standards.

These debates are still playing out, with many supporters of the Act arguing that efforts at improving nutritional standards in school meals have typically resulted in a temporary decrease in participation rates as children and schools resist change, but that over time, school food professionals' challenges with food procurement and menu planning will decrease and that participation rates and revenues will rise again. This paper will focus on a different aspect of the HHFKA that has too often been over-looked. As the following graphs demonstrate, this is the too little noted fact that while the total number of meals served has decreased since the implementation of the HHFKA, there has been an unprecedented increase in the number of free meals served during the same time period. Looking only at the overall decrease in the number of meal served fails to note the increase in participation in free meals, which is a significant sign that the HHFKA is serving low-income populations more effectively.

This is corroborated through the experiences of the School District of Philadelphia, one of the nation's poorest cities, with nearly 200,000 people or a third of the city's population living in deep poverty, or at half the federal poverty line. The success of Philadelphia's Universal Feeding Program in the 1990s and its continued success under the Community Eligibility Provision of the HHFKA has allowed for an immense increase in school meal access for students.

Keywords

school meals, Healthy Hunger Free Kids Act, HHFKA, Community Eligibility Provision, CEP, direct certification, Philadelphia, School District of Philadelphia, Political Science, Summers, Mary, Mary Summers

Disciplines

American Politics | Economic Policy | Inequality and Stratification | Political Science | Politics and Social Change | Public Affairs, Public Policy and Public Administration | Social Policy

**The Impact of the Healthy, Hunger-Free Kids Act of 2010 on
National School Meal Participation Rates**

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PSCI 135: Politics of Food

University of Pennsylvania

Fall 2014 Independent Study

Faculty Advisor: Mary Summers

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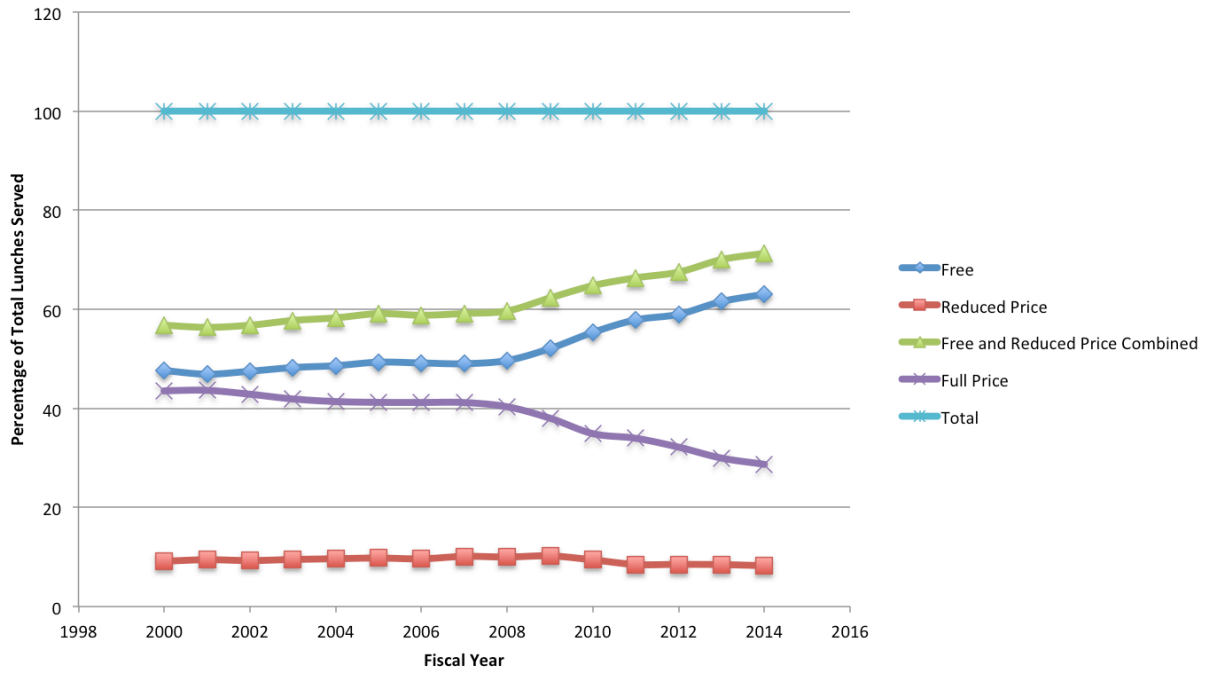
Abstract

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 is the most recent child nutrition reauthorization bill. It authorizes \$4.5 billion in new funding for the United States Department of Agriculture (USDA)'s core child nutrition programs, including the National School Lunch Program and School Breakfast Program. Public focus and attention with regard to the HHFKA has chiefly been focused on the dramatic changes implemented in nutritional requirements for all food served in schools, including new restrictions on the amount of calories, sugar, fat and sodium in school meals. Nutrition advocates have lauded these efforts to address rising rates of childhood obesity, but school meal professionals are concerned with the financial cost of implementing these new standards. Their concerns stem from the question of whether the HHFKA has reduced children's participation in both school meal and a la carte programs, thereby reducing revenues for many school districts, as well as from the fact that the increase in federal reimbursement rates for these meals does not fully cover the cost of implementing the new standards.

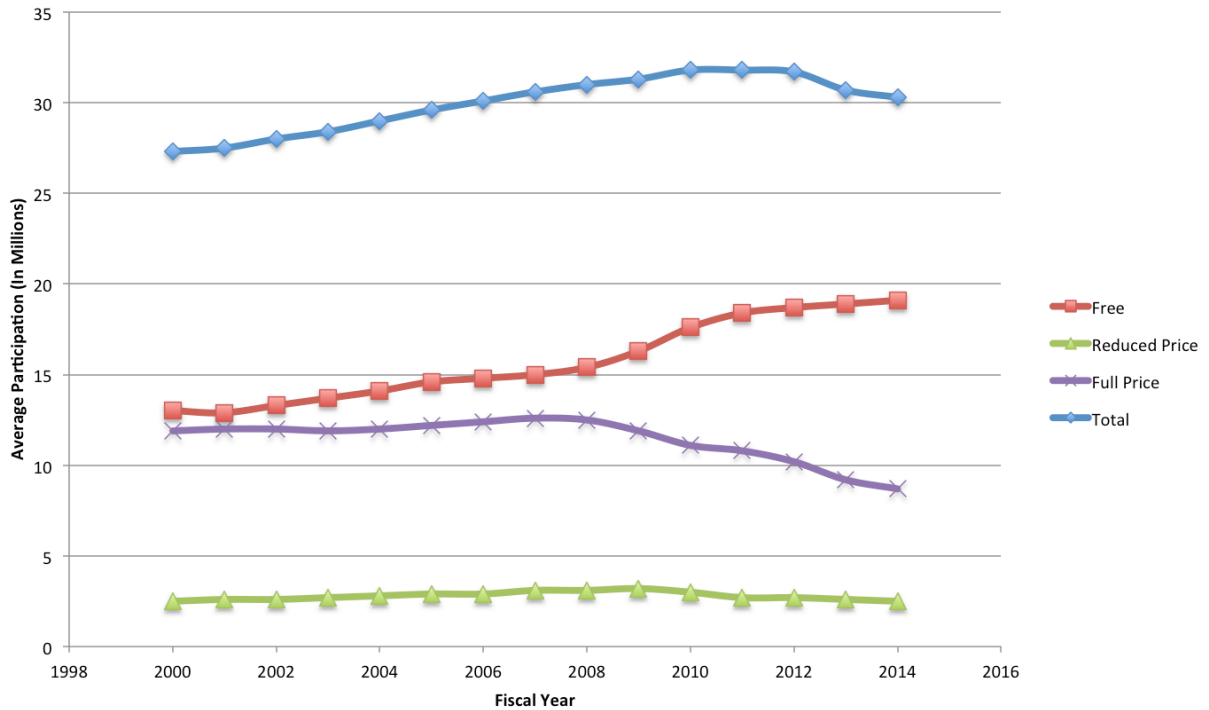
These debates are still playing out, with many supporters of the Act arguing that efforts at improving nutritional standards in school meals have typically resulted in a temporary decrease in participation rates as children and schools resist change, but that over time, school food professionals' challenges with food procurement and menu planning will decrease and that participation rates and revenues will rise again. This paper will focus on a different aspect of the HHFKA that has too often been over-looked. As the following graphs demonstrate, this is the too little noted fact that while the total number of meals served has decreased since the implementation of the HHFKA, there has been an unprecedented increase in the number of free meals served during the same time period. Looking only at the overall decrease in the number of meal served fails to note the increase in participation in free meals, which is a significant sign that the HHFKA is serving low-income populations more effectively.¹

This is corroborated through the experiences of the School District of Philadelphia, one of the nation's poorest cities, with nearly 200,000 people or a third of the city's population living in deep poverty, or at half the federal poverty line. The success of Philadelphia's Universal Feeding Program in the 1990s and its continued success under the Community Eligibility Provision of the HHFKA has allowed for an immense increase in school meal access for students.

Percentage of Total Lunches Served as Free and Reduced Price in National School Lunch Program (NSLP) in the United States from Fiscal Year 2000 to 2014



Average Participation in National School Lunch Program (NSLP) in the United States from Fiscal Year 2000 to 2014



Introduction

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 is the most recent child nutrition reauthorization bill. It authorizes \$4.5 billion in new funding for the United States Department of Agriculture (USDA)'s core child nutrition programs, including the National School Lunch Program and School Breakfast Program.ⁱⁱ Advocates and proponents of the HHFKA seek to achieve two key objectives, which are to promote stricter nutritional requirements and to improve school meal programs, which are a “critical nutrition and hunger safety net for millions of children.”ⁱⁱⁱ This paper will focus primarily on the second objective and explore the evidence that the HHFKA's expansion of school meal programs has made nutritious food more accessible for low-income children.^{iv}

The multiple goals that proponents and critics of school meal programs urge that they should meet include: nutritionally sound meals, low administrative costs, minimal plate waste, exposure to healthy nutrition education, and high participation rates. Unfortunately, however, goals like serving more nutrient dense leafy green and orange vegetables are often in tension with goals like reducing costs and minimizing plate waste. Every child nutrition reauthorization act, which is renewed every five years, inevitably reflects compromises between groups who believe their goal should be at the forefront of the school meal program's mission.^v

The HHFKA is the first Child Nutrition Act in over thirty years to create significant new nutritional standards for school meals, including the requirement that school meals must include a serving each of fruits and vegetables, move towards serving all whole grain carbohydrates, and reduce their sugar, salt, and sodium levels.^{vi} Nutrition advocates have lauded these efforts to address rising rates of childhood obesity, but school meal professionals are concerned with the financial cost of implementing these new standards. Their concerns stem from the question of

whether the HHFKA has reduced children's participation in both school meal and a la carte programs, thereby reducing revenues for many school districts, as well as from the fact that the increase in federal reimbursement rates for these meals does not fully cover the cost of implementing the new standards.

The impact of the HHFKA has been widely debated in the context of multiple claims and counterclaims with regard to the participation rates, food waste, and expenses generated by these new standards. Some critics of the major downsizing of calories, sugar, fat, and sodium in school meals argue that the HHFKA standards are overly restrictive and costly for school districts and school food manufacturers, and that even districts known for engaging children in healthier eating are finding it difficult to implement them.^{vii} For example, the School Nutrition Association (SNA), an organization of over 55,000 members that represents school meal providers across the country, has become one of the act's most significant critics.^{viii} In a 2014 report of the state of school meals, the SNA argued that the USDA's sodium and whole grain requirements are overly burdensome for school food professionals who are "already struggling to manage the high cost of meeting complex regulations."^{ix} In contrast, supporters of the HHFKA argue that efforts at improving nutritional standards in school meals have typically resulted in a temporary decrease in participation rates as children and schools resist change, but that over time, school food professionals' challenges with food procurement and menu planning will decrease and that participation rates and revenues will rise again.^x Rather than engaging in these debates about the HHFKA's nutrition standards, this paper focuses on the impact that the HHFKA has had on children's participation in school meal programs.

The economic recession of 2009 led to national unemployment rates as high as 10.0% in October 2009, and unemployment rates have not yet stabilized to pre-2009 levels.^{xi} Similarly,

food insecurity, defined as the lack of consistent, dependable access to enough food for active, healthy living, rose sharply in the mid to late 2000s and have not yet decreased to pre-recession levels.^{xii} Especially in the context of the growing rates of unemployment and underemployment since the 2009 recession, robust participation in the school meal program is essential for the many students whose households face the threat of food insecurity. At its core, the purpose of school meals is to feed children, and the benefit of increased participation rates means that more children have access to food—a basic human need—at least twice a day in the traditional school breakfast and lunch programs, and for many children three times a day with the new guarantees of an afterschool meal.

This paper will evaluate claims about the HHFKA's impact on school meal participation rates by carefully examining these statistics on a national level. It argues that the act's impact on those children who are most at risk of hunger and food insecurity is of special importance in evaluating its outcomes. Using relevant data and studies of the HHFKA, I will argue that while there has indeed been some decline in national participation rates, the data demonstrates that HHFKA has definitely had a positive impact on participation rates (and, therefore, access to a more nutritious diet) in low-income areas.

Key Policy Debates and Tensions Reflected in the Healthy, Hunger-Free Kids Act

The original goals of federally funded school meal programs were not nearly as complicated as they are in the twenty-first century. During the Great Depression in the 1930s and early 1940s, most children and parents suffered. With a third of the population unemployed and unable to buy food, the economic downturn quickly exhausted private charity resources and

municipal government relief.^{xiii} And for the first time, the federal government became actively involved in feeding schoolchildren under the leadership of President Franklin D. Roosevelt and his New Deal. In 1946, Georgia Senator Richard B. Russell worked with President Harry Truman to secure the passage of the Richard B. Russell National School Lunch Act. This act extended the national school lunch program to all schools and established the beginning of the three-tier eligibility system for meals, which allowed students to pay for a hot, nutritionally balanced meal in accordance to their ability to pay. Students who could not afford school meals would receive them for free, while others would pay twenty cents for their meals.^{xiv}

Since the passage of the National School Lunch Act in 1946, the culture of food and food preparation has changed drastically, and many of these changes have resulted in new goals and priorities for each child nutrition reauthorization act, which renews the funding and determines the federal regulations that govern school meal programs. Successive decades since the Great Depression have collectively “produced a new set of rules but seldom eliminated any old ones,” creating a set of programs that historian Janet Poppendieck describes as thwarting itself at every turn, “simultaneously overregulated and underresourced.”^{xv} The federal school meal program reflects key issues that American society faced throughout the past century: malnourished army recruits and farm surpluses in the 1930s and 40s; hunger and food insecurity in the 1960s and 70s; efforts to cut government spending and nutritional concerns about “fat” as a cause of heart disease in the 1980s; and the rise of childhood obesity in the 1990s and twenty-first century.

One key question from the inception of school food programs has been the extent to which they are serving low-income children effectively. For many decades, the main means to ensure that these programs are available to low-income children has been through a three-tier system of full price, reduced price, or free meals.^{xvi} Within the three-tier eligibility system, the

federal government reimburses state governments, which in turn reimburse and supervise the administration of the National School Lunch Program and School Breakfast Program in local schools. Low-income households are required to fill out forms stating their income level.

Children who live in households that earn 130% or less of the federally established poverty level are eligible to receive free school meals, while children who live in households that earn between 130% and 185% of the federal poverty level are eligible for reduced price meals.^{xvii}

In addition to maintaining this long-standing three tier reimbursement rate and payment plan for school meals, the HHFKA mandated that the federal reimbursement rate for each meal is 2 cents greater for schools that served more than 60% free and reduced price lunches in the 2012-2013 school year. In addition, all school districts now receive an additional 6 cents per lunch in “performance-based cash assistance” if they are certified as meeting HHFKA nutritional requirements.

School Programs Meal, Snack and Milk Payments to States and School Food Authorities						
(Expressed in dollars or fractions thereof effective from July 1, 2014--June 30, 2015)						
(FRP = Free and Reduced Price)						
Schools	Less than 60% FRP	Less than 60% FRP + 6 cents	60% or more FRP	60% or more FRP + 6 cents	Maximum rate	Maximum rate + 6 cents
Paid	0.28	0.34	0.3	0.36	0.36	0.42
Reduced Price	2.58	2.64	2.6	2.66	2.75	2.81
Free	2.98	3.04	3	3.06	3.15	3.21

Figure 1. Federal reimbursement rates for school meals to school authorities in all contiguous states (different payment rates for Hawaii and Alaska). As we can see from this data from the USDA’s July 2014 update on federal reimbursement rates of meals served under the National School Lunch Program, school food services in schools with high poverty rates can receive a maximum of \$2.81 per reduced price lunch and \$3.21 per free lunch. Schools that serve less than 60% free and reduced price meals are eligible for up to \$2.58 per reduced price lunch and \$2.98 per free lunch.^{xviii}

For the School Breakfast Program, the distinction between more than 60% and less than 60% free or reduced price meals is replaced by a more general categorization of “non-severe

need” or “severe need.” Schools that are categorized as “severe need” receive an extra 31 cents for each free and reduced price breakfast that they serve.^{xix}

School breakfast program	Non-severe need	Severe need
Contiguous States:		
Paid	0.28	0.28
Reduced Price	1.32	1.63
Free	1.62	1.93

Figure 2. As we can see from this excerpt from the USDA’s July 2014 update on federal reimbursement rates of meals served under the School Breakfast Program, school food services in schools with “non-severe need” can receive \$1.32 per reduced price breakfast and \$1.62 per free breakfast, while schools with “severe need” can receive \$1.63 per reduced price breakfast and \$1.93 per free breakfast.^{xx}

The federal reimbursement of the National School Lunch and School Breakfast Programs has ingrained the three-tier system of free, reduced price, and full price meals into the American culture of school food. Critics argue that, especially since the rise of competitive foods in vending machines and a la carte lines (which before the passage of HHFKA were not required to meet federal nutrition standards), the three-tier eligibility system has resulted in stigma for the children who choose the free and reduced price meals. At least in part as a result of this stigma, these critics argue, students with money tend to choose the often less nutritious a la carte lines or buy fast food off campus; and even children who are eligible for free and reduced price meals are too often deterred from claiming them.^{xxi} A study conducted by the Institute for Education and Social Policy at New York University, for example, found evidence that the stigma associated with receiving government-subsidized “welfare food” aggravates the social divide between affluent and needy children. As a result of these findings, the authors argued that universal free school meals would be a more effective option than the targeted three-tier food service system in alleviating the stigma associated with eating school food. This would help to increase school meal participation, especially for the low-income children most at risk for food insecurity.^{xxii}

Advocates for universal free meals also note that the paperwork required to implement the three-tier meal system represents a significant financial and bureaucratic burden to schools, as well as a significant barrier for many low-income children, whose households have difficulty in meeting this requirement.^{xxiii}

Efforts of the Healthy, Hunger-Free Kids Act to Meet the Needs of Low-Income Children at Risk for Food Insecurity

While not going so far as instituting universal free meals, one very significant innovation in the HHFKA was to allow individual schools and school districts with a high proportion of low-income students to implement universal free meals by using existing federal and state data to establish their poverty rates, as opposed to having to collect their own data from individual household meal applications, thus significantly reducing the paperwork burden on households, schools and school districts. This was one of several steps designed to address the goal of eliminating childhood hunger that has received relatively little public attention. Another step taken towards this end was the implementation of an Afterschool Meal Program, which made it possible for children in low-income communities to receive additional food outside of the School Breakfast and National School Lunch Programs.

Afterschool Meal Program

The Afterschool Meal Program provides meals and snacks to children up to the age of 18 through eligible afterschool programs in low-income communities. These meals and snacks must meet USDA nutrition standards in order to receive a pre-determined amount of federal

reimbursement.^{xxiv} Before the expansion of the Afterschool Meal Program, which operates as a part of the Child and Adult Care Food Program, all fifty states could receive federal reimbursement for afterschool snacks, but only fourteen states could receive reimbursement for suppers. Through the provisions of the HHFKA, eligibility for federal reimbursement of afterschool snacks and suppers was expanded to all fifty states.^{xxv} As of July 2012, all continental forty-eight states are eligible to receive \$2.98 for each supper and \$0.82 for each snack served through this program. Alaska is eligible for \$4.84 per supper and \$1.33 per snack, while Hawaii is eligible for \$3.49 per supper and \$0.96 per snack.^{xxvi} Reimbursement rates are higher in Alaska and Hawaii because of their high cost of food and living.^{xxvii}

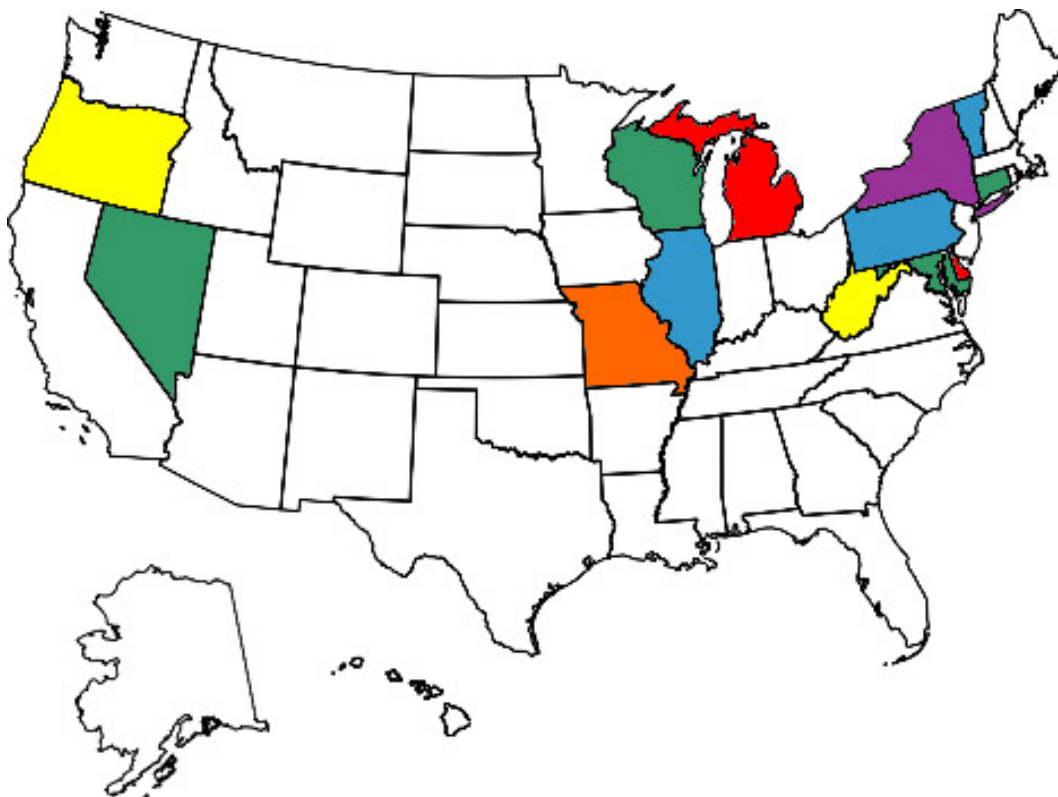


Figure 3. This map represents the states that were able to receive federal reimbursement for both snacks and meals under the Afterschool Meal Program before the Healthy, Hunger-Free Kids Act (Connecticut, Delaware, Illinois, Maryland, Michigan, Missouri, Nevada, New York,

Oregon, Pennsylvania, Vermont, West Virginia, and Wisconsin and the District of Columbia). Note that the vast majority of these 13 states are concentrated in the New England region of the United States, while none are in the South and Great Plains areas.^{xxviii}

Unlike school lunches, which are reimbursed at free, reduced price, and full price levels, afterschool meals and snacks are all reimbursed at the “free” rate. This is because an afterschool program qualifies for federal reimbursement if it is located in a community where at least half of the students in the local elementary, middle, or high school are qualified for free or reduced price school meals. In other words, the Afterschool Meal Program determines eligibility for free meals based on community demographics rather than on children’s individual household incomes.^{xxix}

Direct Certification and Community Eligibility

The HHFKA also increases school meal access for low-income children by streamlining the application process for free and reduced-price meals during school hours. Through the implementation of Direct Certification and the Community Eligibility Provision, the HHFKA reduces the amount of administrative labor and paperwork required for low-income students who wish to establish eligibility for free or reduced price meals.

Direct certification is a process through which school districts and state education agencies share data with the state government’s database of public benefit program recipients. Children who are part of households that receive the Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps) or Temporary Assistance for Needy Families (TANF) are automatically certified to receive free school meals without another application. In other words, there is no separate application process that these students need to complete to establish economic need for free meals.^{xxx}

Direct certification data is key to the successful implementation of the HHFKA's Community Eligibility Provision (CEP), which creates a new universal meal eligibility program that allows "schools in which at least 40 percent of students are directly certified for free meals to offer free meals to all students without collecting paper applications."^{xxxii} Instead of paper applications, CEP relies on enrollment data from direct certification to establish community-wide eligibility for free school meals.

Through the CEP option, which became available for all schools and school districts nationwide in the 2014-2015 school year, the reimbursement rate for school breakfast and lunch is determined by multiplying the percentage of students who are directly certified as eligible for free meals by 1.6. The resulting number represents the percentage of meals that will be reimbursed by the federal government at the "free" reimbursement rate (maximum \$1.93 per breakfast and \$3.21 per lunch), and the rest of the meals will be reimbursed at the much lower "paid" rate (maximum \$0.28 per breakfast and \$0.42 per lunch).^{xxxii xxxiii} For example, if a school district has 40% of its student population directly certified, then if the district decided to participate in CEP by offering all its students free meals, 64% of its meals would be reimbursed at the "free" rate, while 36% of its meals would be reimbursed at the much lower "paid" rate (thus the decision to participate in the program would cost the district some significant revenue). In contrast, if a district had 60% of its students directly certified, then 96% of the district's meals would be reimbursed at the "free" rate and a small 4% would be reimbursed at the "paid" rate (a situation in which a school district clearly has a significant incentive to offer universal free meals).

Benefits are twofold with the Community Eligibility Provision of the Healthy, Hunger-Free Kids Act. On one hand, schools that implement CEP can serve free breakfast and lunch to

all students, as well as offer afterschool snack and supper to students participating in afterschool programs, regardless of a child's individual financial status.^{xxxiv} This has the potential to reduce the burden of paperwork for households whose children are eligible for free school meals, as well as the stigma surrounding free and reduced price meals, making the school meal experience more positive overall. Students enrolled at CEP schools qualify automatically for two free meals a day, plus any additional meals provided through the Summer Food Service and Afterschool Meal Programs, which helps to guarantee better access to good nutrition for all children attending these schools.^{xxxv xxxvi}

In addition, direct certification and CEP reduce the administrative costs and paperwork that schools have faced in certifying that children are eligible for free meals, by using existing data from public benefit programs like SNAP and TANF to analyze the demographics of a community and determine the percentage of students eligible for free meals. A 2000 study by the USDA Food and Nutrition Service studied the effects of direct certification on the National School Lunch Program, and it found that direct certification reduced burdens associated with the distribution, processing, and verification of eligibility of free and reduced price meal applications.^{xxxvii} This frees up more resources for high poverty school districts, which can use the time and money saved from direct certification in another way.

Philadelphia's Universal Feeding Program as a Pilot for Community Eligibility

With a 12.2% deep poverty rate, Philadelphia features the highest rate of deep poverty of any of the nation's ten most populous cities. Nearly 185,000 of the city's population lives in deep poverty, or at half the federal poverty line, and Philadelphia's deep poverty rate is nearly double that of the U.S. population as a whole, of which approximately 6.6% percent (or 20.4 million

people) are in deep poverty.^{xxxviii xxxix} As of December 2013, the School District of Philadelphia (SDOP) enrolls about 142,000 students, of which 71.8 percent are Black/African-American or Hispanic/Latino and 87.3 percent are economically disadvantaged.^{xl}

In this large, urban school district with such high rates of poverty, the cost of assessing eligibility for free and reduced price meals on an individual basis would be truly challenging. But for over twenty years, Philadelphia's unique Universal Feeding Program mitigated these costs, and the success of this program served as a model for the Community Eligibility Provision of the HHFKA.

Prior to 1991, in Philadelphia, as in the rest of the country, individual parents and households were required to submit an Application for Meal Benefits to the school district in order to establish eligibility for free or reduced price meals. If the paperwork collected demonstrated that more than 50% or more of the children in any one school were eligible for free or reduced meals, then all children in the school were eligible for free meals, which significantly reduced the paperwork and stigma associated with determining each child's socioeconomic status in the lunchroom.^{xli} However, the burden of collecting and processing the required paperwork at the administrative level continued to be significant.^{xlii xliii}

Beginning in 1991, the School District of Philadelphia partnered with the United States Department of Agriculture (USDA) to develop a pilot Universal Feeding Program, which eventually became a model for the Community Eligibility Provision of the HHFKA. The Universal Feeding Program in Philadelphia determined which schools were eligible for free meals for all of its students based on a third-party socioeconomic study rather than based on individual meal applications.^{xliv xlv}

This Universal Feeding pilot program was extremely successful in reaching its main objectives, which were to reduce the administrative costs of managing individual meal applications, increase school meal access to students in low-income communities, and increase school meal participation by providing universal service and reducing the stigma associated with the three-tier eligibility system.^{xlvi xlvi} The success of Philadelphia's Universal Feeding Program in the 1990s and its continued success under the Community Eligibility Provision of the HHFKA has allowed for an immense increase in school meal access for low-income students. In fact, as of December 2014, 218 Philadelphia schools serve free meals under Community Eligibility and the District serves an average of 61,650 free breakfasts and 96,600 free lunches daily.^{xlviii}

Participation Rates in Low-Income Communities as a Measure of the Impact of the Healthy, Hunger-Free Kids Act on Food Insecurity

With the economic recession of 2009 and a national unemployment rate that has still not stabilized to pre-recession levels, participation in school meal programs continues to be highly relevant for at-risk communities and schools.^{xlix} In 2013, some 17.5 million households were food insecure while 6.8 million households in the United States were severely food insecure; for these households, limited resources caused the reduction of food intake and the disruption of regular eating patterns. Rates of food insecurity were substantially higher for households with single parents, Black- and Hispanic-headed households, and households in large cities and rural areas as opposed to suburban areas.^{l li}

Improving children's food security through school meals is a key means not only to improving their health and development, but also their school performance. In a 1998 study

contributed to the *Journal of the American Academy of Pediatrics*, researchers reported a close relationship between adequate nutrition and academic performance. Children from low-income families that reported multiple experiences of food insecurity and hunger were more likely to show emotional, behavioral, and academic problems than were children whose families did not report experiences of hunger. According to the study, aggression and anxiety had a very strong association with experiences of hunger and food insecurity.^{lii} This study underlines the importance of improving low-income children's participation in national school meal programs, for increased participation means that more children have access to food; thus participation rates are a highly relevant measure of the impact that the HHFKA has on improving the overall school experience for low-income children.^{liii}

Disaggregating the Numbers: Unprecedented Increase in Free Meals Despite Decrease in Total Number of Meals Served

The USDA and advocates of the HHFKA cite that school meal participation “is increasing substantially in many areas of the country...[and] expects participation to keep climbing” under the new regulations in large school districts, especially in Dallas, Los Angeles, and Florida.^{liv} In contrast, organizations such as the School Nutrition Association complain that schools are struggling with falling participation rates. To understand these debates, this paper will go directly to the USDA's National Level Annual Summary Tables, which are the numerical records of participation and meals served through federal meal programs, and examine the basis for the claims that are being made with regard to national school meal participation rates.^{lv}

Echoing the School Nutrition Association in its concern over decreasing overall school meal participation, the U.S. Government Accountability Office (GAO) notes that the number of

students eating school lunches through the National School Lunch Program declined by 1.2 million students from the 2010-2011 to the 2012-2013 academic year.^{lvi}

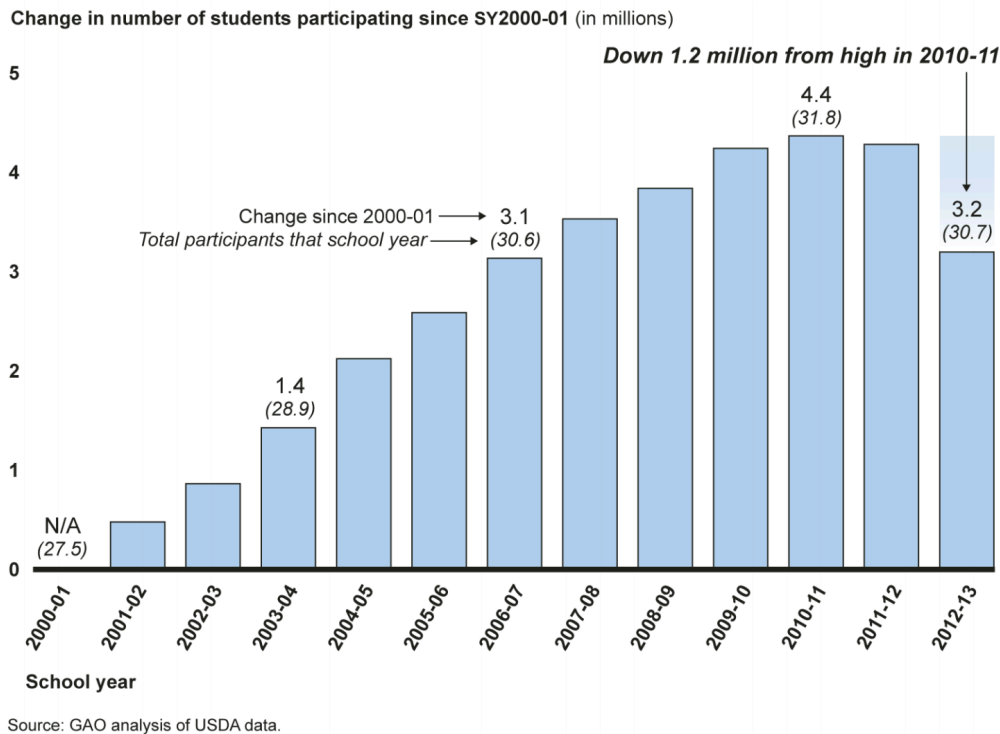


Figure 4. Titled “Participation in the National School Lunch Program, School Years 2000-2001 through 2012-2013”, this chart shows that total student participation—the total number of students who ate school lunches—dropped from school years 2010-2011 through 2012-2013 for a cumulative decline of 1.2 million students (or 3.7 percent), with the majority of the decrease occurring during school year 2012-2013.^{lvii}

According to the GAO, this decrease in total number of students eating school lunches nationwide from the 2010-2011 school year was “driven primarily by a decrease of 1.6 million students paying full price for meals, despite increases in the number of students eating school lunches who receive free meals.”^{lviii} In its analysis of these declines in nationwide participation, the GAO cites evidence that they can be attributed in part to children’s reactions against the implementation of new lunch content and nutritional standards. Out of the 48 states surveyed by the GAO, 33 reported challenges with students expressing dislike for foods like whole grain

products, vegetables, beans, legumes, and red-orange subgroups.^{lix} The report also noted, however, that the policy of “paid lunch equity,” which caused many school districts to raise the price of their paid lunches, may have also had some impact on participation rates. (Paid lunch equity is the HHFKA-mandated requirement that school districts charge children as much for paid lunches as they receive in reimbursement for the meals that they serve free from the federal government.) The GAO notes that the “paid lunch equity” provision was not fully implemented until the 2011-2012 school year, when the numbers for participation in paid meals declined most rapidly.^{lx}

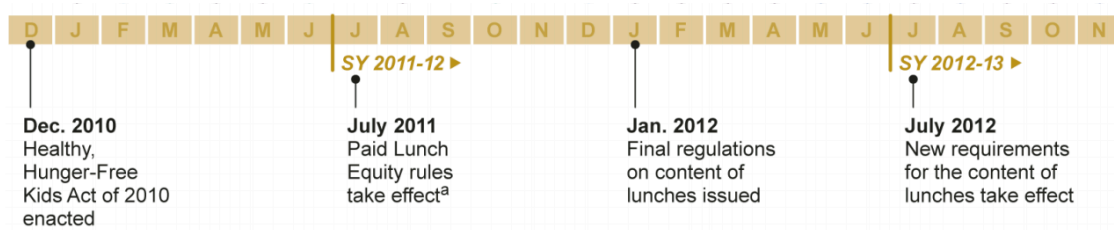


Figure 5. This is a timeline of the implementation of the HHFKA policy of “paid lunch equity,” which took effect at the beginning of the 2011-2012 school year and was finalized by the end of the year. Note that the implementation of “paid lunch equity” coincides with the sharp decline in paid meal participation in the 2011-2012 school year found in Figure 4.^{lxi}

The GAO reports that there are situational factors within individual schools that can explain the decline in paid meals apart from the HHFKA. For example, while school food officials in two school districts believed that the policy of “paid lunch equity” may have contributed to the decline in paid lunches, they also noted the ready availability of alternative food options in vending machines, a la carte lines, or off campus, as sometimes having a greater impact in deterring students from paid lunch participation. Other school food authorities cited the combination of a short lunch period and long lines in the cafeteria as a reason for many students to seek out alternative food options or to simply not eat at all.^{lxii} Thus, the decrease in

participation in paid meals does not necessarily reflect a failure of the HHFKA, so much as the fact that students who can afford to purchase full price meals often have the luxury of seeking out alternative food options on campus (through vending machines or a la carte lines) and off campus (through local eateries) during the lunch period.

Thus, the GAO report suggests that number of students participating in the National School Lunch Program has decreased primarily due to the departure of large numbers of “full price” students from the program. This decline in full price meals masks the positive increase in free and reduced meals served through the National School Lunch Program, a trend that has occurred since 2000 and became more dramatic with the passage of the HHFKA. Figures 6 and 7 below illustrate the increase in free and reduced price lunches, both in terms of absolute number of students served as well as proportion of total lunches served. These figures have increased rapidly since 2008, roughly coinciding with the Great Recession.

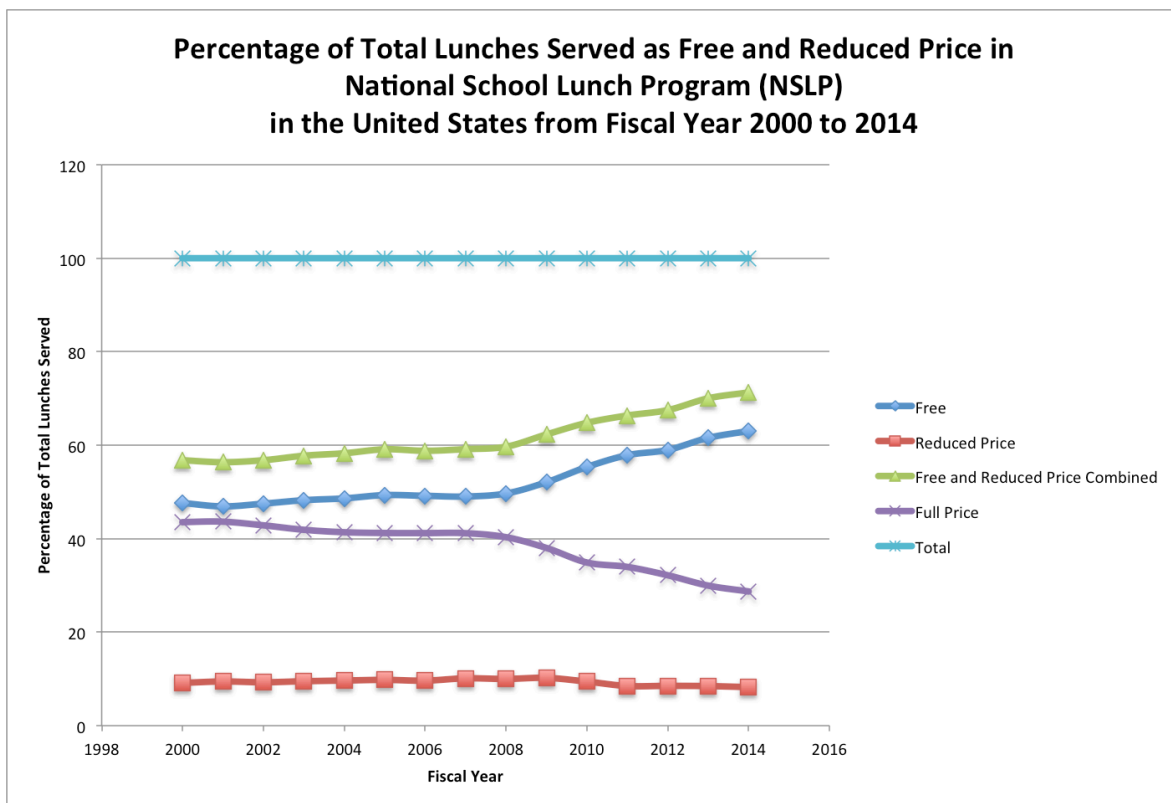


Figure 6. This chart was generated based on data from the USDA’s National level Annual Summary Table titled “National School Lunch Program: Participation and Lunches Served.” It shows a gradual increase in the percentage of free and reduced price lunches served until 2008. From 2008 onwards, the percentage of free lunches increased sharply, the percentage of reduced price lunches remained constant, while the percentage of paid lunches decreased sharply.^{lxiii lxiv}

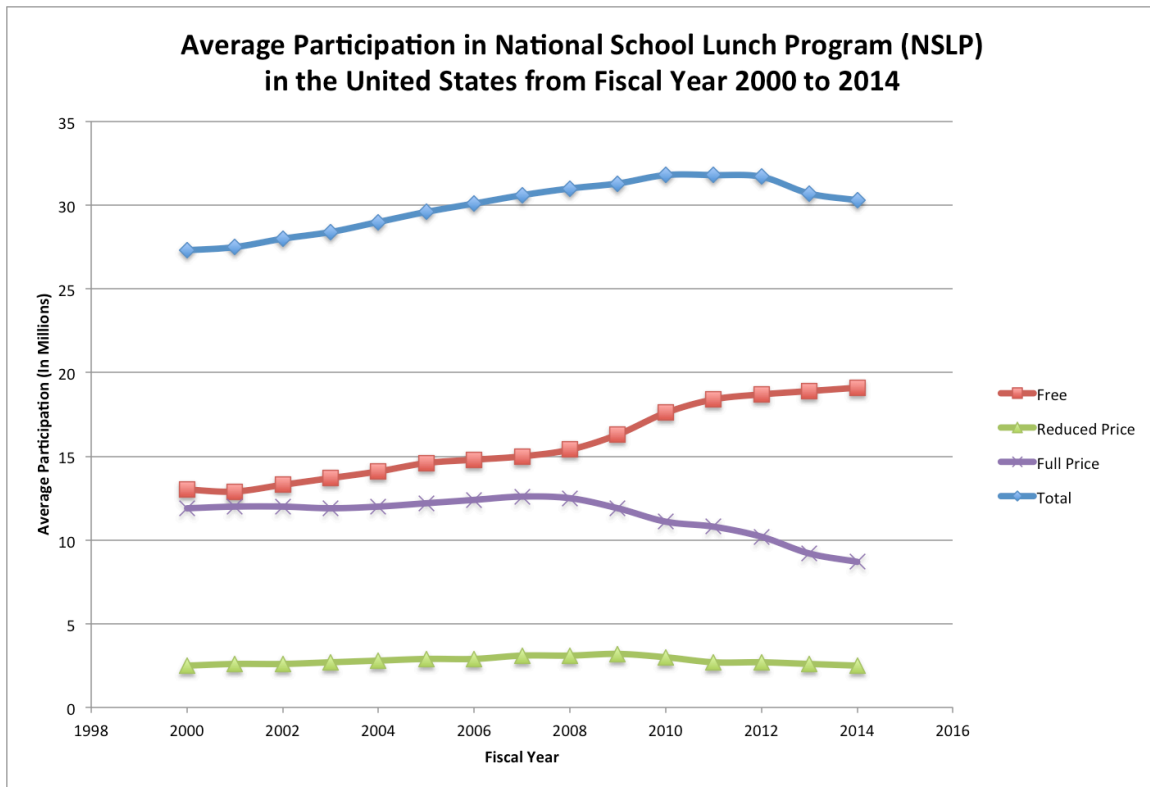


Figure 7. This chart was generated based on data from the USDA’s National level Annual Summary Table titled “National School Lunch Program: Participation and Lunches Served.” It shows a dramatic increase in the number of free meals served since 2010, virtually no change in the number of reduced price meals, and a decrease in the number of paid meals. The number of total meals has fallen off slightly since 2010.^{lxv}

In Figure 6, if we examine the proportion of school lunches that are free and reduced, they have together comprised a greater proportion of all lunches than full price lunches have. The proportions (increase in proportion of free and reduced price lunches and decrease in proportion of paid lunches) have become more dramatic since the passage of the HRFKA in 2010.

National School Lunch Program participation data provided by the USDA helps elucidate the sources of the debate about the impact of the HHFKA on school meal participation rates. While the School Nutrition Association is correct in its observation that the total number of meals served decreased from about 5,278,300 meals in 2010 to 5,007,700 meals in 2014 (approximately a 5.13% decrease), the conclusions drawn from this decrease are oversimplified. As noted in the GAO report, while the number of meals served has indeed decreased since the implementation of the HHFKA, there has been an unprecedented increase in the number of free meals served during the same time period.

NATIONAL SCHOOL LUNCH PROGRAM: PARTICIPATION AND LUNCHES SERVED						
(Data as of February 06, 2015)						
-----Average Participation-----						
Fiscal Year	Free	Reduced Price	Full Price	Total	Total Lunches Served	Percent Free/RP of Total
-----Millions-----						%
2010	17.6	3.0	11.1	31.8	5,278.3	65.3
2011	18.4	2.7	10.8	31.8	5,274.5	66.6
2012	18.7	2.7	10.2	31.7	5,214.8	68.2
2013	18.9	2.6	9.2	30.7	5,097.6	70.5
2014	19.1	2.5	8.7	30.3	5,007.7	71.5

Figure 8. This is a screenshot of data from the USDA’s National Level Annual Summary Table titled “National School Lunch Program: Participation and Lunches Served.”^{lxvi}

While the total number of lunches served through the National School Lunch Program has declined since 2010, the number of free meals served and, consequently, the proportion of free and reduced price meals have increased. The disaggregation of school lunch participation data shows that participation is rising significantly in districts that serve primarily low-income children. Students who are eligible for free and reduced price meals qualify based on the year’s

federal poverty line, and these students arguably need school meal access more than non-eligible students need it. Ultimately, both the proportion and number of students receiving free and reduced price meals is increasing, and that is a good sign for the underserved communities of America.

Conclusion

This paper outlined key debates with regard to the impact of the Healthy, Hunger-Free Kids Act of 2010 on school meal participation rates on a national level. Through the analysis of academic studies, participation data, and claims made by a variety of non-profit organizations, this paper demonstrates that the HHFKA and its progressive reforms have positively impacted low-income children in terms of participation in the School Breakfast and National School Lunch Programs. Direct Certification and the Community Eligibility Provision play an especially important role in minimizing the paperwork that has previously stood as a barrier to low-income children's participation in school meal programs and as an expensive administrative burden to school districts. The guarantee of free and reduced price breakfast and lunch at school is essential for eligible students' health and well-being. Multiple studies demonstrate that school meals also help students achieve greater academic success in school. Increased participation rates in national school meal programs for at-risk students means that these children have access to food, which is a basic human need that should continue to be addressed in future child nutrition reauthorization acts.

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