

## Implications of Ending COVID-era Waiver Flexibility on Free School Meals in the New River Valley

By Sety Abooali

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### Purpose

Pursuant to the Families First Coronavirus Response Act and in response to the extraordinary circumstances caused by the novel coronavirus-19 (COVID-19) pandemic, the Food and Nutrition Service established a temporary nationwide waiver in March 2020 to support the implementation of the [Community Eligibility Provision \(CEP\)](#). The waiver applied to any state and local educational agencies administering the National School Lunch Program and School Breakfast Program and allowed every school across the Commonwealth to offer free breakfast and lunch to all students without the administrative burden and stigma associated with individual-family applications. Subsequent temporary waivers maintained the increased program flexibility through August 2022. Since then, school administrators and students have returned to their schools and classrooms and are grappling with the aftermath of the discontinuance of waiver flexibility. The purpose of this policy brief is to explore the return to pre-COVID-19 Community Eligibility Provision eligibility criteria and its implications for students in Virginia's rural New River Valley.

### What is the Community Eligibility Provision?

Authorized by Congress as a part of the Healthy, Hunger-Free Kids Act of 2010, the CEP was made available nationwide beginning July of 2014. The [CEP](#) allows schools located in low-income areas to provide free breakfast and lunch to all students, eliminating the burden of collecting household applications to determine eligibility for school meal programs.

The qualifying metric to determine a school's eligibility for CEP is the identified student percentage (ISP). The CEP eligibility criteria require that at least 40% of the school's population are:

- Enrolled in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), the Food Distribution Program on Indian Reservations (FDPIR), Medicaid, or live in a household where another student is enrolled in one of these programs, granting them extended eligibility
- Homeless, migrant, runaway, in foster care, or enrolled in Head Start or Early Head Start

If a school meets this criteria, then free breakfast and lunch is provided to all students, removing the burden on families of having to fill out applications and eliminating the stigma that students face when receiving free school meals. Additionally, researchers have found that when schools provide free lunches and breakfasts to all kids on campus, area households spend less on groceries. The CEP decreases the number of shopping trips taken by eligible families by 6-7%, helping alleviate some additional financial burden (Handbury & Moshary, 2021).

The calculation of ISP is contingent on direct certification, which is based on families' participation in other welfare programs. Since [many SNAP-eligible families](#) do not access welfare program benefits and would therefore be uncounted in the ISP measure, a 1.6 multiplier is used to approximate the true percentage of students who would qualify for free or reduced-price lunch (FRPL). This determines what percentage of meals served can be reimbursed at the free rate. For example, using this formula, a school with an ISP of 40% would have 64% of their meal costs reimbursed ( $0.40 \times 1.6 = 0.64$ ), and a school with an ISP of 62.5% would have 100% of their meal costs covered.

In response to the August 2022 discontinuance of COVID-era CEP waiver flexibilities, the Virginia General Assembly allocated a portion of the state budget to expand eligibility for free school meals during the 2022-2023 school year. Instead of families needing to fall at or below 130% of the poverty level, the new threshold now includes students with families at or below 185% of the federal poverty level. As a result, approximately 64,500 more kids can access free school meals (Balow, 2022).

Despite this allocation, some school districts classified as borderline eligible for the CEP have pursued alternative streams of supplemental funding. To date, more than \$260K grant dollars have been allocated from rural local health districts to purchasing meals for students in need. Increasing food security is a priority focus of the CDC-funded [\*\*Virginia Rural Response & Relief Program\*\*](#), which focuses on mobilizing partnerships to advance health equity and address social determinants of health as they relate to COVID-19 health disparities among populations at higher risk and that are underserved.

### **Benefits from the Community Eligibility Provision**

Students & Guardians

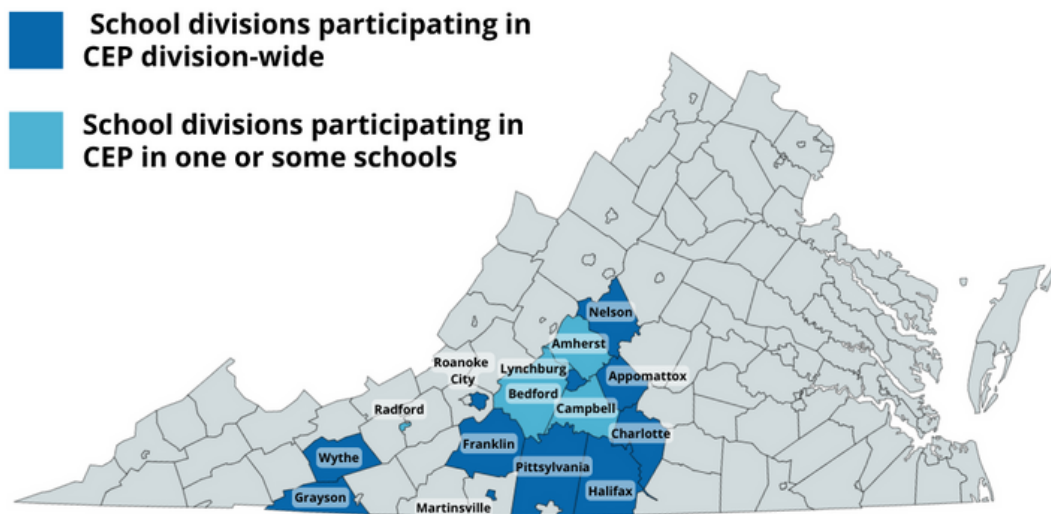
School Staff &  
Administrators

Access to free nutritious meals for all students without submitting household application.	Streamlined meal service operation and more time for students to consume their food.
Less time spent in cashier lines, no stigma.	Reduced paperwork and administrative costs.
Reduced stress about maintaining meal account balance.	No need to track unpaid meal charges.
Lifting nutritional financial burdens off the family.	Improved program integrity and more nourished students ready to learn and grow.

## **The Intersectionality of the CEP and Food Insecurity**

**WITH EVERY STUDENT GETTING  
TWO FREE MEALS A DAY,  
FOOD INSECURITY AMONG  
HOUSEHOLDS WITH CHILDREN  
FELL FROM 14.5% TO 12.5%  
FROM 2020 TO 2021.** (Lacko, 2022)

During the COVID-19 pandemic, federal funding and waiver flexibility allowed free school meals to all students. Further research appears to demonstrate that offering free meals to a greater number of students at no cost lifted more children out of poverty in 2021 than in 2020 (Creamer et al., 2022). This decrease in food insecurity and poverty is in part due to free meal offerings at schools reducing some financial burden on families. Another study showed that when children are given free school meals, households with children reduced their grocery expenditures at Retail Merchandising System (RMS) retailers by 13% relative to households without children (Handbury & Moshary, 2021). Reducing food insecurity and poverty leads to overall better health outcomes by promoting healthy nutrition and ensuring that everyone has adequate resources to access health services.

**Community Eligibility Provision in the New River Valley****Community Eligibility Provision**  
in the New River Valley

Some schools and districts are just under the threshold for being able to give free breakfast and lunch to their students. For example, Radford High School (RHS) in Radford, VA is the only school in the district that can not give all their students free meals since they just missed the eligibility criteria with only about 34% of the school population qualifying. As a result, the portion of students that need free meals must fill out an application.

In an interview with Robert Graham, Superintendent, and Connie Wood, Director of School Nutrition, both of Radford City Schools, the repercussions to RHS's ineligibility was discussed. By having each student have to fill out an application, there is an increased risk of students not filling out the applications due to a fear of the stigma around getting free school meals; since not every student is receiving free meals, there is more attention drawn to those receiving the free meals. As a result, many students go without meals throughout the day, and these same students may not have meals waiting for them at home. Graham and Wood also emphasized the effects of malnutrition on academic performance. Without an adequate amount of food, students are less likely to focus and perform well in school.

Radford High School's dilemma highlights the need to take into account the schools that are close to the 40% minimum requirement. Both Graham and Wood wish that the threshold would be lowered and that some sort of monitoring should be performed on the schools that are so close to the 40% threshold to get a better sense of their need for school-wide free meals.

### **Opportunities to improve the health and nutrition of students who attend CEP-eligible and borderline eligible schools**

- ***Reduce the CEP eligibility threshold percentage.***
  - Reducing the Identified Student Percentage from 40% to 25%, for example, could extend the lasting economic impact and nutritional improvements seen when the CEP was eligible to more schools and students during the COVID-19 pandemic.
- ***Increase financial viability of CEP participation.***
  - Schools with ISP values between 40% and 62.5% must bear some (but not all) of the cost of meal provision to their students, with schools closer to the low end of that range facing larger cost burdens, potentially deterring them from enrolling in the program. Increasing the multiplier that determines the amount of federal reimbursement a school receives from 1.6 to 2.5 may make the provision more financially viable for schools.
- ***Improve the direct certification process.***
  - High-poverty school districts with low direct certification rates will find that their identified student percentage does not accurately reflect the level of poverty within the student population. This may be due to not all school districts having adopted effective direct certification systems, leading to uneven enrollment for free school meals, added application burdens for schools and families, and eligible children missing the free, nutritious meals they need. Examples of successful state-level improvements include incorporating new data sources, increasing matching frequency, improving match software, and providing training to school district staff.

- ***Dissociate participation in CEP with the schools' poverty ranking.***
  - Since schools might differ in their eligibility based on these different measures, a move to CEP can affect the poverty ranking of schools within a district. A change in the poverty ranking of a school could alter the distribution of Title I funds and other resources within a district, potentially making at least some schools and districts reluctant to join CEP (Zerbino & Franco, 2022).
  
- ***If a state or district-wide transition to the CEP is not financially viable, improve the application process for free and reduced school meals.***
  - To alleviate the administrative burden of completing and processing individual household applications, a system by which students of low socioeconomic status are automatically identified and offered free and reduced price school meals could be developed.
    - The Healthy Hunger-Free Kids Act initiated a [demonstration project](#) in 2021 to conduct direct certification of children individually participating in Medicaid and children in Medicaid households. Unlike the other programs used to directly certify children for school meals, Medicaid does not convey categorical eligibility for free school meals, but rather identifies children in households that would meet the income eligibility thresholds for free and reduced price school meals. As of the 2020-2021 school year, Virginia was one of fifteen states operating under an expanded direct certification demonstration project to test direct certification with Medicaid for free and reduced price meals using a household income test.

## Acknowledgments

Thank you to Robert Graham and Connie Wood for participating in an interview and sharing their insights on how Radford High School and its staff and students are being affected by the shift away from COVID-19 CEP eligibility flexibilities.

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### Virginia State Office of Rural Health

“*The Virginia State Office of Rural Health (VA-SORH) was established in 1991 to create, fund, and support quality and sustainable rural healthcare infrastructure throughout the Commonwealth of Virginia. The VA-SORH is housed within the Virginia Department of Health, Office of Health Equity, and is the sole organization in Virginia that is federally designated to address and rectify health disparities affecting the state’s rural residents. The mission of the office is to partner with rural communities to identify opportunities and long-term solutions that ensure the health and prosperity of all Virginians. The VA-SORH fulfills this mission through providing technical assistance, regulatory updates, resources, and opportunities for collaboration with communities.*”



For more information, visit us online at: <https://www.vdh.virginia.gov/health-equity/division-of-rural-health/> .



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