NEMOURS CHILDREN'S HEALTH | Well Beyond Medicine

National Office of Policy & Prevention

1201 15th St. NW
Ste. 520
Washington, DC 20005

United States Department of Agriculture
School Meals Policy Division
Food and Nutrition Service
P.O. Box 9233, Reston, Virginia 20195

RE: Proposed Rule — Child Nutrition Programs: Community Eligibility Provision — Increasing Options for Schools

Dear Secretary Vilsack,

On behalf of Nemours Children's Health, I write in strong support of the United States Department of Agriculture's (USDA) proposal to lower the minimum Individual Student Percentage (ISP) threshold for the Community Eligibility Provision (CEP) from 40 percent to 25 percent. This proposed rule would significantly increase the number of schools in underserved communities that can offer free school meals to all their students, reduce stigma and administrative burdens, and streamline food service operations, making it a win for students, families, and school districts across the country.

ABOUT NEMOURS

Nemours Children's Health is one of the nation's largest multistate pediatric health systems, which includes two free-standing children's hospitals and a network of more than 70 primary and specialty care practices. Nemours Children's seeks to transform the health of children by adopting a holistic health model that utilizes innovative, safe, and high-quality care, while also caring for the health of the whole child beyond medicine. Nemours Children's also powers the world's most-visited website for information on the health of children and teens, Nemours KidsHealth.org. Nemours KidsHealth is a pioneer and leader in pediatric health content that has been trusted by millions worldwide for more than 25 years.

The Nemours Foundation, established through the legacy and philanthropy of Alfred I. duPont, provides pediatric clinical care, research, education, advocacy, and prevention programs to the children, families and communities it serves. For more information, visit Nemours.org.

NEMOURS SUPPORTS EXPANDING CEP ELIGIBILITY

As a pediatric health system, we are acutely aware that hunger in childhood can have long-term negative consequences. Children who experience food insecurity or hunger are more likely to be overweight or obese,[i] become hospitalized, and have higher prevalence of chronic conditions such as asthma and depression.[ii] Furthermore, children who grow up missing meals are more likely to repeat a grade in elementary school, experience developmental delays, and have more social and behavioral issues than children who are food secure.[iii]

Since its inception, CEP has been instrumental in ensuring that students in the most disadvantaged communities have access to free meals in schools so they can grow and thrive. Access to free breakfast and lunch is demonstrated to provide numerous benefits for children and families including reducing student hunger, supporting

household finances, and improving student behavior and academic achievement.[iv, v, vi, vii, viii, ix] The pandemic-era waivers made it possible for schools across the country to offer universal free meals to all their students for the 2021-22 school year. Millions more students were able to participate in free school meals, allowing them to experience the health and educational benefits associated with access to free school meals.[x] This proposed rule could help address child hunger in states in which Nemours operates and nationally. In Delaware, it is estimated that 1 in 7 children face hunger[xi] and in Central Florida, the estimates are 1 in 5 children.[xii] The Delaware Department of Education estimated that the expansion of CEP would qualify an additional 18,000 students for free school meals.

Improving Child Health

The USDA's implementation of school meal nutrition standards, as updated in 2013, has led to significant improvements in the nutritional quality of school meals.[xiii] There are studies that show meals brought from home have lower nutritional content than school meals. A study in Houston, TX, compared foods brought from home by students across 12 schools with current nutrition standards. Results from the study showed that home brought meals did not have the same quality nutrition content as meals served in schools.[xiv] Another study examined the nutritional quality of packed lunches brought from home by pre-kindergarten and kindergarten students compared with school lunches provided in three rural Virginia schools. The study found that school lunches are higher in nutrition quality compared to lunches brought from home.[xv] Additionally, a recent national study found that healthier school meals help reduce childhood obesity,[xvi] which affects nearly one in five children in the U.S.[xvii] Further, children in food insecure homes are more likely to be overweight or obese than food-secure children, as their families consume less costly, calorically dense, shelf-stable foods rather than fresh foods.[xviii] Free school meals can help provide increased access to nutritious foods, which are important for long-term health.

Impact on Education

Implementation of CEP is shown to improve student behavior and academic achievement. In an analysis conducted in 2018, CEP implementation reduced out-of-school suspension rates by about 15 percent for elementary students and 6 percent for middle school students.[xix] Another analysis showed that universal school meals improved students' math performance, particularly among minority students from the most disadvantaged neighborhoods.[xx] Despite the benefits of CEP, it is still not reaching enough eligible students. An estimated 20-55 percent of students from low-income households who are eligible for free school meals do not participate.[xxi] This is likely the result of stigma, administrative burden, and application costs.[xxii] By expanding the CEP eligibility threshold, schools with students that meet the new threshold would be able to provide free meals for all students, regardless of family income. If this proposed rule is implemented, the Food Research and Action Center estimates that an additional 9 million students will have access to free, nutritious school meals.

Impact on Food Insecurity

School meals provide a critically important safety net to reduce child hunger. For children living in poverty, free school meals may represent the only complete meals they get to eat on a given day. CEP is an effective tool to alleviate food insecurity for households with children. When school districts adopt CEP, more children in high-poverty communities get to eat breakfast and lunch, enabling them to receive the nutritional support they need to learn in school.[xxiii] Moreover, a 2022 analysis showed that CEP exposure can have positive impacts on household budgets and food spending. Families with children who participated in free school meals through CEP were able to spend less on groceries and CEP exposure was associated with an

approximately 5 percent decline in food insecurity for participating households. [xxiv]

CONCLUSION

Nemours is encouraged by USDA's proposed revisions to the CEP threshold and believes it will have a meaningful impact on improving food access for our nation's children. We are pleased to support this proposed rule. Please do not hesitate to reach out to me at Daniella.Gratale@nemours.org or Vy Oxman at Vy.Oxman@nemours.org if we can be of further assistance.

Sincerely,

Daniella Gratale, MA
Associate Vice President, Federal Affairs
Nemours Children's Health

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