

# School Lunch and Breakfast Participation: A Snapshot of Recent Trends

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## School Lunch and Breakfast Participation: A Snapshot of Recent Trends

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) provide federal funding for school lunches and breakfasts served to nearly 30 million students in approximately 94,000 elementary and secondary schools nationwide. Approximately 9 out of 10 public schools operate the school meals programs, as do a smaller proportion of private schools. Students may receive free meals, reduced-price meals, or full-price meals through NSLP and SBP. While the federal government provides a reimbursement rate for all three types of meals, full-price (or *paid*) meals served are subsidized at a lower rate than free or reduced-price meals served.

Over the past 15 years, the NSLP and SBP have undergone changes that have affected participation in the programs. In 2010, the Healthy, Hunger Free Kids Act (P.L. 111-296) made several changes to the school meals programs. It created the Community Eligibility Provision (CEP), an option for eligible schools to provide universal free meals under an alternative federal funding formula. It also required the U.S. Department of Agriculture (USDA) to update nutrition standards for school meals and set minimum price requirements for paid lunches. More recently, the COVID-19 pandemic prompted changes to the school meals programs resulting in temporary federal funding for universal free school meals from March 2020 through school years (SYs) 2020-2021 and 2021-2022. Post-pandemic, eight states have continued universal free school meals programs using state funds.

Federal and state policies, along with other factors such as school enrollment and economic conditions, have contributed to recent trends in school meals participation. One trend has been an expansion of universal free meals programs. In SY2023-2024, approximately 60% of NSLP-participating schools operated universal free meals programs under state or federal options, up from 18% in SY2014-2015. There has also been growth in the SBP (consistent with historical trends), with more schools adopting the program and more students participating over time. School participation in NSLP has been steadier, but *student* lunch participation declined between 2010 and 2019 before leveling off in recent years.

Participation levels influence federal funding for school meals, which is calculated on the basis of meals served. Annual inflation adjustments to school meals reimbursements, required by law, also affect spending. Between FY2010 and FY2019, federal spending on NSLP and SBP increased, before experiencing significant fluctuations during the COVID-19 pandemic. Post-pandemic (FY2024) spending was higher than pre-pandemic (FY2019) spending when looking at actual but not inflation-adjusted figures.

Consistent with an expansion of universal free meals programs, CRS analysis of U.S. Census Bureau Survey of Income and Program Participation (SIPP) data shows that an increasing proportion of free meals recipients came from middle- and higher-income households in recent school years. However, students from low-income households had the highest rates of participation in the programs. Elementary school students also had higher rates of participation compared to middle and high school students.

Congressional policymakers may be interested in recent school meal participation trends as they consider changes to NSLP and SBP. For example, some lawmakers may be interested in expanding or rolling back universal free meals programs, with some arguing for reduced stigma and administrative burdens and others arguing for a retained focus on targeting federal aid to those most in-need. Other lawmakers may be interested in making changes to school nutrition standards, which can affect student participation in school meals. This report also raises other questions for consideration, such as why private school operation of NSLP has been declining and why states vary in terms of their school adoption and student participation rates.

## Contents

Introduction .....	1
Background on NSLP and SBP .....	2
Schools That Perform Traditional Eligibility Determinations.....	5
Schools that Participate in the Community Eligibility Provision or Provision 1, 2, or 3.....	6
Schools That Use State or Local Options.....	7
Recent History .....	8
The Healthy, Hunger-Free Kids Act of 2010 .....	9
COVID-19 Pandemic .....	9
Participation at a Glance.....	11
What proportion of schools currently participate in NSLP and SBP? .....	11
What proportion of students currently participate in NSLP and SBP? .....	13
Recent Trends in Participation and Spending.....	15
Trends in School Operation of NSLP and SBP .....	15
Trends in Student Participation in NSLP and SBP.....	17
Increase in Free Meals .....	21
Trends in Federal Spending on NSLP and SBP .....	23
Spending at a Glance .....	24
What factors contribute to school meals spending?.....	26
State Trends.....	29
Future Spending Projections .....	30
Characteristics of Participants and Nonparticipants.....	31
Discussion .....	35

## Figures

Figure 1. Universal Free School Meals Policies by State, SY2024-2025 .....	8
Figure 2. Estimated Proportion of Private and Public Schools Participating in SBP and NSLP.....	12
Figure 3. Estimated Percentage of Public Schools Operating NSLP by State, SY2022-2023 .....	13
Figure 4. School Meals Participants and Nonparticipants, FY2023.....	14
Figure 5. Student Lunch Participation Rates in NSLP Schools by State, FY2023.....	15
Figure 6. Trends in Public School Participation in NSLP and SBP, SY2010-2011 to SY2022-2023 .....	16
Figure 7. Trends in Private School Participation in NSLP and SBP, SY2009-2010 to SY2021-2022 .....	17
Figure 8. Trends in NSLP and SBP Student Participation, FY2010-FY2024 .....	18
Figure 9. Trends in School Lunch Prices, SY2011-2012 to SY2023-2024.....	20
Figure 10. Share of NSLP Schools Operating Universal Free Meals Programs, 10-Year Trend .....	22
Figure 11. Share of Students Approved for Free and Reduced-Price School Meals, 10-Year Trend.....	23
Figure 12. Trends in NSLP and SBP Spending, FY2010-FY2024.....	25

Figure 13. Federally Reimbursed Lunches by Category, FY2010-FY2024 .....	28
Figure 14. Federally Reimbursed Breakfasts by Category, FY2010-FY2024.....	29
Figure 15. Change in Federal NSLP and SBP Spending by State, FY2024 versus FY2019.....	30
Figure 16. Selected Characteristics of School Lunch Participants versus Nonparticipants .....	33
Figure 17. Distribution of Students Receiving Free Lunches by Household Poverty Status, SY2017-2018 to SY2022-2023 .....	34
Figure 18. School Breakfast versus Lunch Participation: Student Poverty Levels and Meal Type.....	35
Figure C-1. Trends in NSLP and SBP Student Participation, FY1994-FY2024 .....	46
Figure C-2. Trends in NSLP and SBP Spending, FY1982-FY2024.....	47

## **Tables**

Table 1. Federal Reimbursement Rates: NSLP and SBP, SY2024-2025.....	4
Table 2. Year-to-Year Change in NSLP and SBP Cash Reimbursement Rates, SY2010- 2011 through SY2024-2025 .....	26
Table B-1. Public School Participation in NSLP by State or Jurisdiction, SY2022-2023.....	40
Table B-2. Student Participation in NSLP by State, FY2023 .....	42
Table B-3. Federal NSLP and SBP Spending by State, FY2019 versus FY2024.....	44

## **Appendixes**

Appendix A. Data Sources and Limitations .....	37
Appendix B. State-Level Data.....	40
Appendix C. Long-Term Trends.....	46

## **Contacts**

Author Information.....	47
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## Introduction

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) provide federal funding for school lunches and breakfasts served to nearly 30 million children daily in close to 94,000 schools.<sup>1</sup> Local *school food authorities* (usually food service departments of school districts) operate the programs and are overseen by state agencies.<sup>2</sup> The highest reimbursements are provided for free and reduced-price meals served to eligible children; a smaller reimbursement is provided for full-price (or *paid*) meals served to children who do not qualify for free or reduced-price meals.<sup>3</sup> Altogether, federal spending on NSLP and SBP totaled \$23.5 billion in FY2024.<sup>4</sup>

Because federal spending on NSLP and SBP depends in part on student participation in school meals, it may be of interest to Congress to examine participation trends. In addition, policymakers may be interested in the number of children receiving free, reduced-price, and paid meals and whether eligible children are receiving the free and reduced-price meals for which they qualify. Policymakers may also be interested in emerging trends in the programs, such as the locally, state-, and federally driven shifts to universal free meals in schools.

Few analyses have examined recent trends in NSLP and SBP participation and spending.<sup>5</sup> This report focuses primarily on the years since the most recent child nutrition reauthorization act, the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296).<sup>6</sup> This period saw the implementation of the Community Eligibility Provision (CEP)—an option for high-poverty schools to serve free meals to all children under an alternative federal reimbursement formula—as well as updated nutrition standards for school meals, new pricing policies for full-price meals, and pandemic-era policies that provided universal free meals and enhanced reimbursements, among other changes (discussed in the next section).

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<sup>1</sup> U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), “October 2024 Keydata Report,” January 10, 2025, <https://fns-prod.azureedge.us/data/october-2024-keydata-report>.

<sup>2</sup> For further background on the school meals programs, see CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

<sup>3</sup> According to household application criteria established in the Richard B. Russell National School Lunch Act, students in households with incomes at or below 130% of the federal poverty guidelines (published by the U.S. Department of Health and Human Services, which differ from the Census Bureau’s poverty levels) qualify for free meals and those with household incomes between 130% and 185% of the guidelines qualify for reduced-price meals. However, some students above 185% of poverty receive free meals due to policies such as direct certification with SNAP and other programs/avenues, CEP, and state-level policies. For more information on program eligibility rules, see CRS Report R46888, *Amending Eligibility Rules for Free and Reduced-Price School Meals: Background and Policy Options*.

<sup>4</sup> This figure excludes other program costs, such as state administrative expenses. USDA, FNS, “Child Nutrition Tables: NSLP, SBP and SMP - Program Costs—Cash and Commodities,” data as of January 10, 2025, <https://www.fns.usda.gov/pd/child-nutrition-tables>.

<sup>5</sup> Previous analyses include USDA, Economic Research Service (ERS), “The National School Lunch Program: Background, Trends, and Issues, 2024 edition,” Report No. EIB-279, 2024; Gregory Golino, Katherine Ralston, and Joanne Guthrie, “Participation Trends for Full Price Meals in the National School Lunch Program,” *Applied Economic Perspectives and Policy*, vol. 43, no. 3 (2021), pp. 1161-1175; Congressional Budget Office (CBO), “Child Nutrition Programs: Spending and Policy Options,” September 2015, <https://www.cbo.gov/publication/50737>; USDA, ERS, “The National School Lunch Program: Background, Trends, and Issues,” ERR-61, July 2008; and USDA, ERS, “Profiles of Participants in the National School Lunch Program: Data from Two National Surveys,” *Economic Information Bulletin*, no. 17, August 2006.

<sup>6</sup> While the Healthy, Hunger-Free Kids Act of 2010 is generally considered the most recent child nutrition reauthorization act, other laws have amended child nutrition programs in the years since that act. For example, the Consolidated Appropriations Act, 2023 (P.L. 117-328) made changes to meal service in the Summer Food Service Program (SFSP) and authorized a permanent Summer Electronic Benefits Transfer (Summer EBT) Program for Children.

The report examines the shifts in program participants by category (free, reduced-price, paid) in recent years, including the shift to increased free meals and universal free meals policies. It also looks at changes in school adoption of NSLP and SBP. Finally, the report examines some characteristics of school meals participants, such as their household income levels, grade levels, and racial/ethnic backgrounds. State-level differences are highlighted when available. However, the report generally does not examine differences at the school or school district level, such as school/district size, resources, or urbanicity (though some data are presented on public versus private schools).<sup>7</sup>

While this report provides descriptive statistics on school meals participation and discusses changes in federal policy as they relate to school meals participation, it does not provide a causal analysis of why changes occurred. For example, the report provides some discussion of the literature but does not provide original analysis on some of the factors that affect participation, such as economic conditions and palatability of meals.

There are limitations to school meals participation data (discussed further in **Appendix A**). The U.S. Department of Agriculture (USDA) collects data on students certified for free and reduced-price lunches and meals served by category (free, reduced-price, paid); however, it does not collect data on actual meal recipients. Instead, USDA estimates recipients based on counts of meals served. Other data (e.g., characteristics of school meals participants) are CRS estimates based on national survey data and are therefore subject to some error that arises from sampling and response bias. In addition, some data are only available for prior school years, and it is unclear how trends may have changed in school year (SY) 2023-2024 or SY2024-2025.

## Background on NSLP and SBP

Most of the 94,000 schools that participate in NSLP or SBP nationwide are public schools, although some private schools participate as well (discussed in the section, “What proportion of schools currently participate in NSLP and SBP?”). Schools are not required by federal law to participate in NSLP or SBP. However, some state laws require schools to have a school lunch and/or breakfast program, including some that require schools to operate such programs through NSLP and/or SBP. Schools that do not operate the federal school meals programs may still operate locally funded meals programs.<sup>8</sup>

The school meals programs do not exclusively serve low-income children. In schools that operate the programs the traditional way (discussed below in the section, “Schools That Perform Traditional Eligibility Determinations”), students may qualify for free or reduced-price meals, or they may purchase school meals at full price. The school food authority then receives a cash reimbursement for each meal served that complies with federal nutrition standards. The highest federal reimbursement is provided for the free meals served, the next highest for reduced-price meals, and a lower rate is provided for full-price or *paid rate* meals served to children who do not

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<sup>7</sup> For example, see Katherine Ralston and Constance Newman, “School Meals in Transition,” *Economic Research Service (ERS), Economic Information Bulletin*, no. 143, August 2015; and Gregory Golino, Katherine Ralston, and Joanne Guthrie, “Participation Trends for Full Price Meals in the National School Lunch Program,” *Applied Economic Perspectives and Policy*, vol. 43, no. 3 (2021), pp. 1161-1175.

<sup>8</sup> There is limited research on schools that opt out of the federal school meals programs. An older (1993) Government Accountability Office (GAO) analysis found that smaller and wealthier schools were more likely to drop out of NSLP. GAO found that common reasons for departure included financial considerations and compliance with federal nutrition standards. See GAO, *Schools That Left the National School Lunch Program*, December 1993, <https://www.gao.gov/assets/80/78774.pdf>.

qualify for free or reduced-price meals.<sup>9</sup> (Students in the paid rate category are included in the estimates of total NSLP and SBP participants presented in this report.) School food authorities may use the reimbursements for a range of allowable food and operational costs.<sup>10</sup> School food authorities may also receive other sources of funding to support their meals programs, including student payments, school district funding, and state funding.<sup>11</sup>

### **Key Background on Participation in School Meals**

- **Most, but not all, students attend a school operating NSLP and/or SBP.** (This is discussed further in the section, “What proportion of schools currently participate in NSLP and SBP?”)
- **NSLP and SBP subsidize meals served to students who qualify for free or reduced-price meals (at a higher rate) as well as meals purchased by students who do not qualify for such meals (at a lower rate).** The latter are referred to as *paid* or *full-price* meals and are included in participation estimates in this report unless noted.
- **Not all students who receive free meals come from low-income households.** Over the past decade, CEP and state policies have expanded the population of students receiving free meals.
- **Students may not participate in school meals for a variety of reasons.** These include NSLP or SBP not being offered at their school, eating breakfast at home, bringing their own lunch, skipping lunch, or traveling off-campus for lunch (in the case of some older students). Data on nonparticipants are included for comparison throughout this report.

School meals reimbursement rates for SY2024-2025 are displayed in **Table 1**. The reimbursement rates are established in federal law and are adjusted annually for inflation by USDA.<sup>12</sup> Because the law allows reimbursement for every meal served that meets nutrition standards, federal funding is open-ended and can fluctuate with participation. Funding is typically appropriated on an annual basis, and is considered appropriated mandatory spending.<sup>13</sup>

<sup>9</sup> Meals must meet federal nutritional requirements in order to be reimbursable. Further background on school meals nutrition standards can be found in CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

<sup>10</sup> USDA, FNS, “Indirect Cost Guidance,” SP 60-2016, September 30, 2016, <https://www.fns.usda.gov/cn/indirect-cost-guidance>.

<sup>11</sup> For more information, see the “Nonfederal Funding” section of CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

<sup>12</sup> Sections 4 and 11 of the Richard B. Russell National School Lunch Act (42 U.S.C. §1753 and 42 U.S.C. §1759a) and Section 4 of the Child Nutrition Act of 1966 (42 U.S.C. §1773). For SY2024-2025 NSLP and SBP cash reimbursement rates, see USDA, FNS, “National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates,” 89 *Federal Register* 56720, July 10, 2024, <https://www.federalregister.gov/documents/2024/07/10/2024-15175/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>. The rates are adjusted annually in accordance with the Food Away From Home series of the Consumer Price Index for All Urban Consumers (CPI-U). For the NSLP commodity reimbursement rate, see USDA, FNS, “Food Distribution Program: Value of Donated Foods From July 1, 2024, Through June 30, 2025,” 89 *Federal Register* 56286, July 9, 2024, <https://www.federalregister.gov/documents/2024/07/09/2024-15031/food-distribution-program-value-of-donated-foods-from-july-1-2024-through-june-30-2025>.

<sup>13</sup> For more information, see CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

**Table I. Federal Reimbursement Rates: NSLP and SBP, SY2024-2025**

Per-Meal Reimbursements for the 48 Contiguous States and the District of Columbia

Lunch Reimbursement Rates		
Meal Type	Base Rate	Maximum Rate
Free	\$4.43	\$4.69
Reduced-price	\$4.03	\$4.29
Paid	\$0.42	\$0.59
Breakfast Reimbursement Rates		
Meal Type	Base Rate	Maximum Rate
Free	\$2.37	\$2.84
Reduced-price	\$2.07	\$2.54
Paid	\$0.39	\$0.39

**Source:** USDA, FNS, “National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates,” July 10, 2024, 89 *Federal Register* 56720.

**Notes:** Table does not reflect rates for Alaska, Guam, Hawaii, Puerto Rico, or the U.S. Virgin Islands, which are available at <https://www.federalregister.gov/documents/2024/07/10/2024-15175/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>.

NSLP and SBP include options under which school food authorities can opt to serve free meals to all students (*universal free meals*) and receive a different federal reimbursement formula (discussed in the section, “Schools that Participate in the Community Eligibility Provision or Provision 1, 2, or 3”). Those options include CEP, Provision 2, and Provision 3. Under CEP, schools receive a mix of free and paid-rate reimbursements. Under Provision 2 and Provision 3, schools receive free, reduced-price, and paid rate reimbursements but they are calculated differently than under traditional rules.

NSLP and SBP are two separate programs, and schools can choose to operate one and not the other.<sup>14</sup> The programs are discussed together in this report because they share many of the same requirements (including eligibility requirements), and schools typically operate both programs. Differences between NSLP and SBP are noted where applicable.

In addition to cash reimbursements, states participating in NSLP receive a smaller amount of federal aid in the form of a per-meal commodity reimbursement (included in the spending estimates in this report), which they can use towards USDA-purchased foods (“USDA Foods”) for distribution to schools.<sup>15</sup> There are also school meals program options through which residential child care institutions, school-based afterschool programs, and school-run summer

<sup>14</sup> USDA estimated that 94% of schools operating NSLP also operated SBP in FY2020 prior to the COVID-19 pandemic (USDA, FNS, “2023 USDA Explanatory Notes—Food and Nutrition Service,” p. 35-14, <https://www.usda.gov/sites/default/files/documents/35-2023-FNS.pdf>).

<sup>15</sup> USDA, FNS, “Food Distribution Program: Value of Donated Foods From July 1, 2024, Through June 30, 2025,” 89 *Federal Register* 56286, July 9, 2024, <https://www.federalregister.gov/documents/2024/07/09/2024-15031/food-distribution-program-value-of-donated-foods-from-july-1-2024-through-june-30-2025>. For a list of available USDA Foods, see USDA, FNS, “USDA Foods Available List for SY 2026,” February 6, 2025, <https://www.fns.usda.gov/usda-fis/foods-available>.

meals programs may receive funding for meals or snacks (generally not included in the estimates in this report unless noted).<sup>16</sup>

The next sections provide more detail on school options within NSLP and SBP and how they affect federal funding.

## Schools That Perform Traditional Eligibility Determinations

This section describes eligibility rules for free and reduced-price meals in schools that operate the traditional form of NSLP and SBP (i.e., it excludes schools that participate in CEP or another special option, which are discussed in the next section).

Schools operating NSLP and SBP under traditional rules conduct an eligibility determination process to determine which children qualify for free or reduced-price meals. That process takes the form of (1) household applications and (2) *direct certification* (i.e., automatic enrollment) based on documentation of participation in a qualifying program or status. There are two main eligibility pathways:

- **Income eligibility:** The household income limit is 130% of the federal poverty guidelines for free meals (up to \$40,560 for a household of four in SY2024-2025) and between 130% and 185% of the federal poverty guidelines for reduced-price meals (up to \$57,720 for a household of four in SY2024-2025).<sup>17</sup> These thresholds are set in statute, including annual inflation adjustments.<sup>18</sup> Income eligibility for free and reduced-price meals is generally determined by household application.<sup>19</sup>
- **Categorical eligibility:** Children may also become eligible for free school meals through their participation in another federal program or having a certain status. Children qualify for free meals (without additional household income consideration) if they are in a household participating in the Supplemental Nutrition Assistance Program (SNAP), the Food Distribution Program on Indian Reservations, Temporary Assistance for Needy Families (TANF) (with limitations), Head Start, or a Runaway and Homeless Youth program; or if they meet the definition of a “foster child,” “migratory child,” or “homeless child.”<sup>20</sup> Categorical eligibility may be indicated on a household application, or the school food authority may determine that a child is categorically eligible via direct certification with no additional action required by the household. School food authorities and states conduct direct certification by comparing program enrollment records.<sup>21</sup>

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<sup>16</sup> For a discussion of these program options, see CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding* and CRS Report R46888, *Amending Eligibility Rules for Free and Reduced-Price School Meals: Background and Policy Options*.

<sup>17</sup> USDA, FNS, “Child Nutrition Programs: Income Eligibility Guidelines,” 89 *Federal Register* 12812, February 20, 2024.

<sup>18</sup> Section 9(b)(1) of the Richard B. Russell National School Lunch Act (codified at 42 U.S.C. §1758(b)(1)(A)).

<sup>19</sup> With the exception of the Medicaid direct certification demonstration, discussed in this section.

<sup>20</sup> Section 9(b)(12)(A) of the Russell National School Lunch Act (codified at 42 U.S.C. §1758(b)(12)(A)). For more information, see USDA, FNS, *Eligibility Manual for School Meals: Determining and Verifying Eligibility*, July 2017, p. 42, <https://www.fns.usda.gov/eligibility-manual-school-meals>.

<sup>21</sup> Further background on direct certification is available in CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

One exception to the above rules is the *Direct Certification with Medicaid for Free and Reduced-Price Meals* demonstration project, which automatically certifies children for free and reduced-price meals based on household income data acquired through the Medicaid program. As of SY2024-2025, 43 states had opted into the demonstration project.<sup>22</sup>

As noted previously, schools participating in the traditional versions of NSLP and SBP receive the free reimbursement rate for meals served to students approved for free meals, the reduced-price reimbursement rate for meals served to reduced-price category students, and the paid rate for meals served to all other students.

## Schools that Participate in the Community Eligibility Provision or Provision 1, 2, or 3

Authorized in the Healthy, Hunger-Free Kids Act of 2010, CEP allows eligible schools, groups of schools, and school districts to offer free meals to all enrolled students.<sup>23</sup> To participate in CEP, the school(s) must have an identified student percentage (ISP) of at least 25% (USDA lowered the eligibility threshold from 40% to 25% as of SY2023-2024).<sup>24</sup> The ISP is the percentage of students in the school(s) who are certified for free meals without a household application (i.e., who are directly certified for free meals through SNAP or another program/category).<sup>25</sup> In addition, the school(s) must operate both NSLP and SBP in order to participate in CEP, and they must opt in to it.

Though CEP schools serve free meals to all students, they are not reimbursed at the free rate for every meal served. Instead, the law provides a funding formula: the ISP is multiplied by a factor of 1.6 to estimate the proportion of students who would be eligible for free or reduced-price meals had they been certified via application.<sup>26</sup> The result is the percentage of meals served that will be reimbursed at the free-meal rate, with the remainder reimbursed at the much lower paid-meal rate. For example, if a CEP school has an ISP of 40%, then 64% of its meals served would be reimbursed at the free-meal rate and the remaining 36% would be reimbursed at the paid-meal rate.

Though CEP schools serve free meals to all students, they are not reimbursed at the free rate for every meal served.

Unlike CEP, *Provision 2* and *Provision 3* are options available to all schools. Similar to CEP, schools, groups of schools, or school districts must agree to provide universal free meals (lunches *or* lunches and breakfasts) to all students in order to

<sup>22</sup> USDA, FNS, “National School Lunch and School Breakfast Program Demonstration Projects to Evaluate Direct Certification with Medicaid,” October 10, 2024, <https://www.fns.usda.gov/cn/direct-certification-medicaid-demonstration-project>.

<sup>23</sup> For further detail on CEP, see CRS Report R46371, *Serving Free School Meals through the Community Eligibility Provision (CEP): Background and Participation*.

<sup>24</sup> USDA, FNS, “Child Nutrition Programs: Community Eligibility Provision-Increasing Options for Schools,” 88 *Federal Register* 65778, September 26, 2023.

<sup>25</sup> A school’s number of identified students is essentially the same as its number of directly certified students, except that the number of identified students does not include students who are directly certified for reduced-price meals through the Medicaid demonstration. For the definition of “identified students” in regulations, see 7 C.F.R. §245.9(f)(1)(ii).

<sup>26</sup> Statute allows USDA to set the reimbursement multiplier between 1.3 and 1.6; USDA has set the multiplier at 1.6. If a school has an ISP of 62.5% or higher, they receive the free reimbursement rate for 100% of meals served ( $62.5\% \times 1.6 = 100\%$ ). USDA, FNS, “National School Lunch Program and School Breakfast Program: Eliminating Applications Through Community Eligibility as Required by the Healthy, Hunger-Free Kids Act of 2010,” 81 *Federal Register* 50194, July 29, 2016, p. 50201 (hereinafter, “USDA, FNS, 81 *Federal Register* 50194, July 29, 2016”).

participate in Provision 2 or Provision 3. Under Provision 2, schools are reimbursed over a four-year period using the proportion of meals served at the free, reduced-price, or paid rates during the first year. Eligibility determinations in the first year are based on direct certification *and* household applications (which is a difference from CEP). Under Provision 3, schools are similarly required to make eligibility determinations in the first year of a four-year period. However, in this case, schools receive the same level of federal assistance over the next three years, which is adjusted for enrollment and inflation (there are no separate payments for free, reduced-price, or paid meals).<sup>27</sup>

Not a universal meals option, *Provision 1* is intended to streamline the eligibility and reimbursement process by allowing schools with high proportions (80% or more) of students eligible for free and reduced-price meals to make free meals eligibility determinations that remain in effect for two school years. This reduces the number of applications they have to process (though they still have to process reduced-price meals applications annually).<sup>28</sup>

## Schools That Use State or Local Options

States or local school districts may provide funding to expand the population of students receiving free or reduced-price meals. In such cases, federal funding rules do not change.

Several states dedicate additional funding to support school meals programs, and some use this funding to expand the student population receiving free school meals. For example, some states cover reduced-price meal fees.<sup>29</sup> Other states started sponsoring universal free school meals after the expiration of COVID-19-pandemic response policies that provided federal funding for universal school meals. **Figure 1** shows the status of state-funded universal free meals programs. As of SY2024-2025, eight states—California, Colorado, Massachusetts, Maine, Michigan, Minnesota, New Mexico, and Vermont—had indefinitely authorized universal free school meals (lunches and breakfasts). Two states—Connecticut (in SY2022-2023) and Nevada (in SY2022-2023 and SY2023-2024)—previously sponsored universal free meals.<sup>30</sup>

In states that sponsor universal free school meals, the federal funding structure does not change. However, some state universal meals policies require eligible schools to adopt CEP in an attempt to boost federal funding.<sup>31</sup>

In some cases, a school or school district may decide to provide its own funding for an expansion of free meals or universal meals. It is unclear from current data sources how many might be doing so, or the source of such funding. In addition, schools and school districts may end up footing part of the bill for state or federal universal free meals policies if federal or state dollars do not make up for the loss of student payments for meals.

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<sup>27</sup> USDA, FNS, 81 *Federal Register* 50194, July 29, 2016.

<sup>28</sup> Section 11(a)(1) of the NSLA (codified at 42 U.S.C. §1759a(a)(1)); 7 C.F.R. §245.9; USDA, FNS, “Provisions 1, 2, and 3,” May 6, 2014, <https://www.fns.usda.gov/school-meals/provisions-1-2-and-3>.

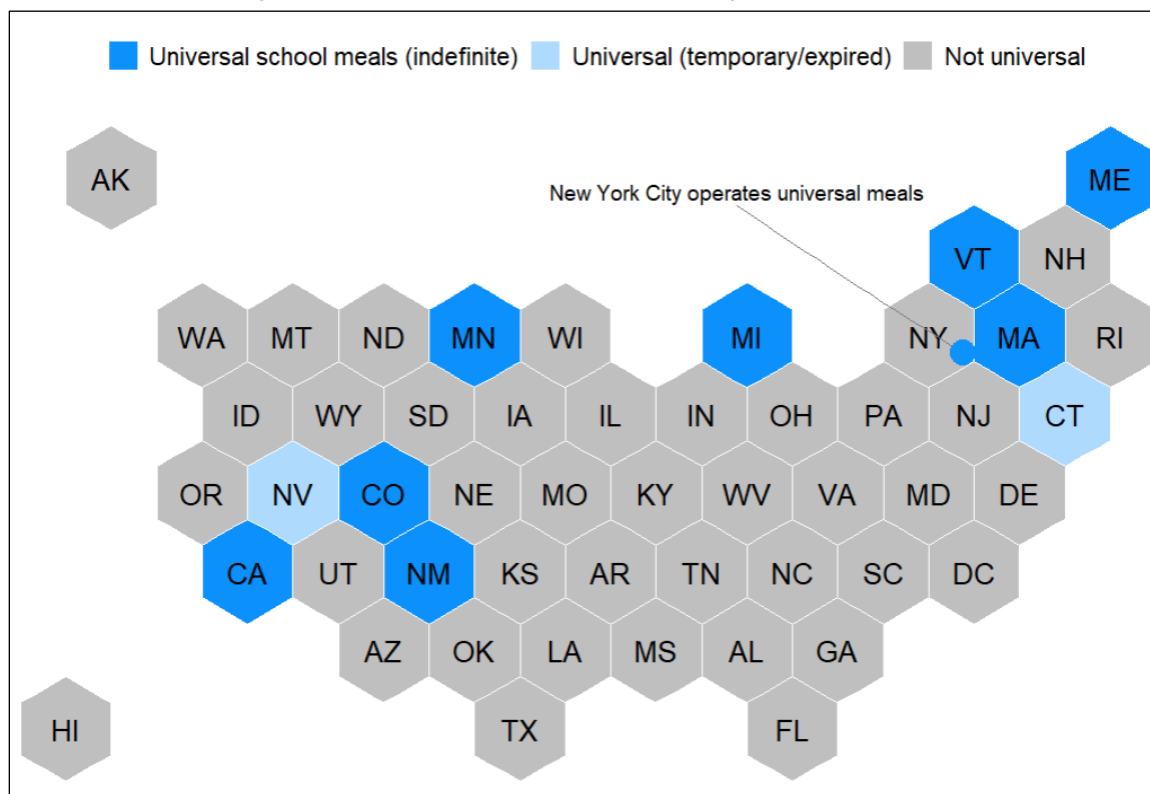
<sup>29</sup> Food Research and Action Center (FRAC), “School Meals Legislation and Funding by State,” updated July 2023, <https://frac.org/wp-content/uploads/School-Meals-State-Legislation-Chart.pdf>.

<sup>30</sup> FRAC, “Healthy School Meals for All,” updated June 2024, <https://frac.org/healthy-school-meals-for-all>.

<sup>31</sup> For example, California requires eligible schools to adopt CEP (California Department of Education, “Universal Meals Frequently Asked Questions,” <https://www.cde.ca.gov/ls/nu/univmealsfaq.asp>). There is some initial evidence that CEP may increase student participation and federal spending, as noted in the “Changes in Meals Served (Participation)” section of this report.

**Figure 1. Universal Free School Meals Policies by State, SY2024-2025**

States Funding Universal School Meals and States with Expired Universal Meals Policies



**Source:** CRS, based on Food Research and Action Center (FRAC), “Healthy School Meals for All,” updated March 2025, <https://frac.org/healthy-school-meals-for-all>.

**Note:** Connecticut funded universal free meals in SY2022-2023 and Nevada funded universal free meals in SY2022-2023 and SY2023-2024.

## Recent History

The first federal aid for school meals dates back to the 1930s, with permanent authorization of NSLP in 1946 and SBP in 1975. The programs largely experienced long-standing growth until 1980, when they were subject to domestic spending cuts. However, federal aid soon rebounded, and the programs continued to grow, particularly in the wake of free meal eligibility expansions and automatic certification processes implemented in the 2000s.<sup>32</sup> (**Appendix C** highlights longer-term participation and spending trends.)

This section describes two major policy developments that have occurred in the decades since: (1) the implementation of the Healthy, Hunger-Free Kids Act of 2010—the most recent child nutrition reauthorization act as of the cover date of this report, and (2) the federal response to the COVID-19 pandemic, which affected school meals operations in several recent years. This post-2010 period is the focus of this report.

<sup>32</sup> For a longer legislative history of the school meals programs, see Appendix A of CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

## **The Healthy, Hunger-Free Kids Act of 2010**

The Healthy, Hunger-Free Kids Act of 2010 made several policy changes to the school meals programs with implications for participation. One major change was the authorization of CEP, which gave schools, groups of schools, and school districts that met a certain threshold<sup>33</sup> the option to serve free meals to all students (*universal free meals*) under a different federal reimbursement formula starting in SY2014-2015.<sup>34</sup>

Another major change was a required update to school meals nutrition standards to align with recommendations from the National Academies of Sciences, Engineering, and Medicine and the Dietary Guidelines for Americans.<sup>35</sup> The updated nutrition standards, which rolled out starting in SY2012-2013, increased the amount of fruits, vegetables, and whole grains in school meals and limited flavored milk, sodium, and calories. A number of schools experienced difficulty implementing the changes and reported issues with student acceptance of foods. Congress and multiple Administrations made subsequent changes that loosened certain aspects of the standards.

The Healthy, Hunger-Free Kids Act of 2010 also required some schools to raise their prices of lunches for students who do not qualify for free or reduced-price meals (this requirement has since been loosened through agency guidance and appropriations acts).<sup>36</sup>

## **COVID-19 Pandemic**

Major changes to school meals programs occurred during the COVID-19 pandemic. When schools began closing in March 2020, USDA allowed local schools and providers to serve free meals to-go to any child through the Summer Food Service Program (SFSP) and receive the SFSP free reimbursement for those meals. This option continued through SY2020-2021.

In SY2021-2022, USDA used a different program—the Seamless Summer Option (SSO)—to enable schools to continue serving free meals to all children (although approximately 4% of schools decided to switch back to NSLP and SBP with eligibility determinations).<sup>37</sup> SSO-participating schools received the NSLP/SBP free reimbursement rate for all meals served during this time.

In SY2022-2023, all schools switched back to NSLP and SBP and no longer received the free reimbursement rate for all meals served. However, as a result of the Keep Kids Fed Act of 2022 (P.L. 117-158), schools received supplemental funding for meal reimbursements.

In SY2023-2024, the enhanced reimbursements ended and operations returned to pre-pandemic rules. However, there was some evidence of lingering pandemic- and inflation-related challenges in the school meals programs. A USDA survey found that 95% of school food authorities reported at least one supply-chain related challenge in SY2023-2024—the most common being high food

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<sup>33</sup> As originally implemented, they had to have an ISP of at least 40%. USDA has since changed this threshold to 25%. USDA, FNS, “Child Nutrition Programs: Community Eligibility Provision-Increasing Options for Schools,” 88 *Federal Register* 65778, September 26, 2023, <https://www.federalregister.gov/documents/2023/09/26/2023-20294/child-nutrition-programs-community-eligibility-provision-increasing-options-for-schools>.

<sup>34</sup> For background and statistics on CEP (prior to the 25% eligibility threshold change), see CRS Report R46371, *Serving Free School Meals through the Community Eligibility Provision (CEP): Background and Participation*.

<sup>35</sup> For further history, see CRS Report R47522, *USDA’s Latest Update to Nutrition Standards for School Meals*.

<sup>36</sup> For more information, see CRS Report R45486, *Child Nutrition Programs: Issues in the 115th Congress*.

<sup>37</sup> CRS calculations based on administrative data acquired from USDA, FNS in June 2024.

costs, followed by staffing shortages.<sup>38</sup> A separate survey by the School Nutrition Association (an advocacy and membership group for school nutrition professionals) likewise indicated that schools were experiencing challenges with food costs, product availability, and staffing as of SY2023-2024.<sup>39</sup>

In addition to meal reimbursements, USDA provided *Supply Chain Assistance Funds* to school food authorities from SY2021-2022 through SY2023-2024 to address some of these purported issues. Using funding from its Commodity Credit Corporation, USDA allocated nearly \$3.8 billion to states for distribution to school food authorities to purchase unprocessed or minimally processed domestic food products “to help SFAs [school food authorities] deal with challenges, such as unanticipated cancellation of food and supply contracts, reduced availability of certain foods, unexpected substitution of certain products, unpredictable increases in food and supply prices, and other obstacles.”<sup>40</sup> USDA has also increased funding for USDA food purchases and state food purchases for schools during this timeframe.<sup>41</sup>

### Datasets Used in This Report

This report primarily uses four datasets to examine participation (as detailed in **Appendix A**):

- **USDA’s administrative data on meal count and spending (National Data Bank):** Schools track meals served through NSLP and SBP on a daily basis and report this information to their states on a monthly basis, which then report it to USDA. USDA uses the data to create an estimate of participants and calculate reimbursements for states and schools. The final dataset shows meal counts, participants, and expenditures by state and meal category, among other variables.
- **USDA’s administrative data on students approved for school meals (FNS-742 data):** Each fall, school districts report information on how many students were certified for free and reduced-price meals in NSLP and SBP. The dataset also includes descriptive data on the number of schools participating in CEP and the other special provisions.
- **U.S. Census Bureau’s Survey of Income and Program Participation (SIPP):** SIPP is a nationally representative survey that collects information on households’ program participation and benefit receipt, including school meals. The data include all students who report receiving school meals, not just those in NSLP and SBP schools. For the purposes of this report, SIPP provides descriptive statistics on children who do and do not receive school meals, such as their household income status, race and ethnicity, and grade level.
- **U.S. Department of Education’s National Center for Education Statistics (NCES) data:** NCES conducts an annual census of all public elementary and secondary schools in the United States (the Common Core of Data [CCD]), as reported by state educational agencies. The CCD includes public schools’ NSLP participation status. Separately, NCES conducts a biennial survey of all private schools in the United States through the Private School Universe Survey (PSS). The PSS does *not* include schools’ NSLP participation status; therefore, this report estimates private schools’ participation in NSLP using a combination of USDA and PSS data.

<sup>38</sup> USDA, FNS, “School Food Authority Survey III on Supply Chain Disruption and Student Participation,” December 2024, <https://www.fns.usda.gov/research/schoolmeals/sfa-survey3-scd>.

<sup>39</sup> School Nutrition Association, “2024 School Nutrition Trends Report,” January 2024, <https://schoolnutrition.org/wp-content/uploads/2024/01/2024-Trends-Report.pdf>. For descriptive statistics on the school meals labor force, see CRS Report R47199, *The School Foodservice Workforce: Characteristics and Labor Market Outcomes*.

<sup>40</sup> USDA, FNS, “2025 USDA Explanatory Notes – Food and Nutrition Service,” pp. 34-47, <https://www.usda.gov/sites/default/files/documents/34-FNS-2025-ExNotes.pdf>.

<sup>41</sup> USDA, FNS, “Supply Chain Assistance Funding Opportunities for Schools,” <https://fns-prod.azureedge.us/sites/default/files/resource-files/supply-chain-assistance-funding-opportunities.pdf>.

## Participation at a Glance

### What proportion of schools currently participate in NSLP and SBP?

There is no federal requirement that schools participate in NSLP and SBP; however, some states require participation in NSLP and/or SBP.<sup>42</sup> Other states do not specifically require use of the federal programs but do require schools to operate lunch and breakfast programs, including the provision of free and reduced-price meals to qualifying students.<sup>43</sup>

**Figure 2** displays the estimated share of schools nationwide that participate in NSLP and SBP, using both USDA administrative data on NSLP- and SBP-participating schools and national data on elementary and secondary schools from the U.S. Department of Education (ED) (for further information on the datasets and methodology used in this report, see **Appendix A**). As of SY2022-2023, approximately 9 out of 10 public schools operated NSLP.<sup>44</sup> Participation rates were lower among private schools, with roughly 1 in 7 operating NSLP in SY2021-2022 (the most recent year data are available).<sup>45</sup> Both public and private schools operated SBP at slightly lower rates than NSLP (it is possible to operate one program and not the other).<sup>46</sup>

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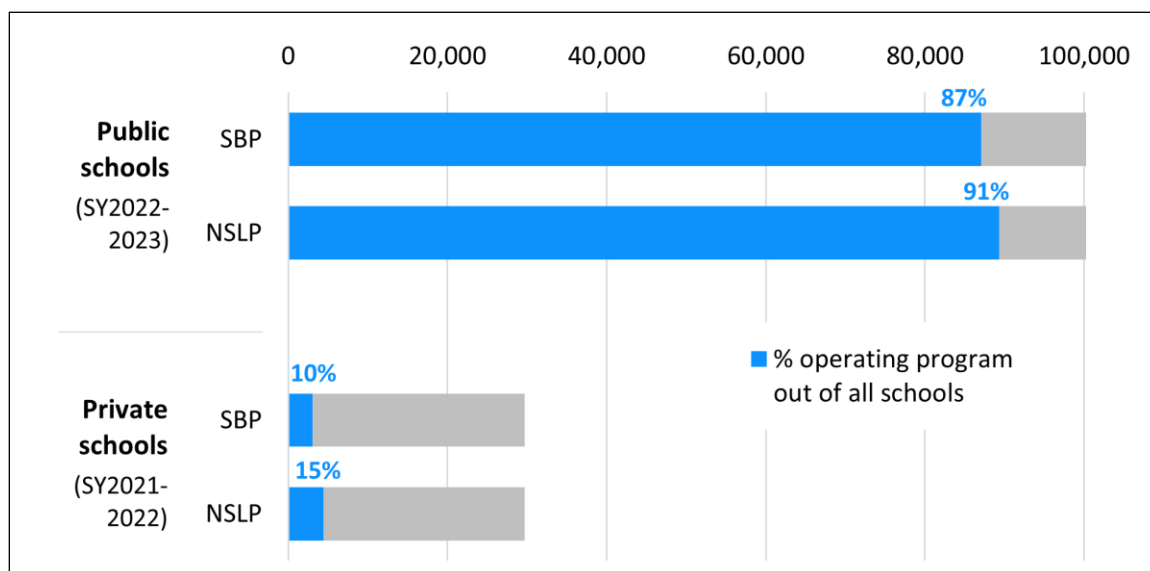
<sup>42</sup> FRAC, “School Meals Legislation and Funding by State,” updated July 2023, <https://frac.org/wp-content/uploads/School-Meals-State-Legislation-Chart.pdf>. For example, Arizona requires all K-8 schools to participate in NSLP with limited exceptions, Maine requires all public K-8 schools to participate in NSLP, and Kansas requires all public schools to participate in SBP.

<sup>43</sup> FRAC, “School Meals Legislation and Funding by State,” updated July 2023, <https://frac.org/wp-content/uploads/School-Meals-State-Legislation-Chart.pdf>.

<sup>44</sup> According to CRS calculations using NCES data, approximately 92% of public schools (91,806 out of 100,227) operated NSLP in SY2022-2023.

<sup>45</sup> According to CRS calculations, roughly 15% of private schools operated NSLP in SY2021-2022 (4,459 out of 29,727 private schools). This is an approximation, as there are limitations to applying USDA administrative data to NCES data (discussed in **Appendix A**).

<sup>46</sup> According to CRS calculations using the most recent data available, roughly 87% of public schools (87,070 out of 99,409) operated SBP in SY2022-2023 and 10% of private schools (3,067 out of 29,727) operated SBP in SY2021-2022. These are approximations, as there are limitations to applying USDA administrative data to NCES data (discussed in **Appendix A**).

**Figure 2. Estimated Proportion of Private and Public Schools Participating in SBP and NSLP**

**Source:** CRS calculated the percentage of NSLP public schools using ED, NCES, Common Core of Data (CCD) for SY2022-2023 (Version 1a). The NCES CCD does not collect data on SBP participation; therefore, CRS applied the number of SBP public schools in fall 2022 from USDA administrative data to NCES CCD data on total schools in SY2022-2023. The number of private NSLP and SBP schools was acquired through communication with USDA, FNS in April 2024 and applied to the total number of private schools in the United States from NCES, Private School Universe Survey (PSS), 2021-22.

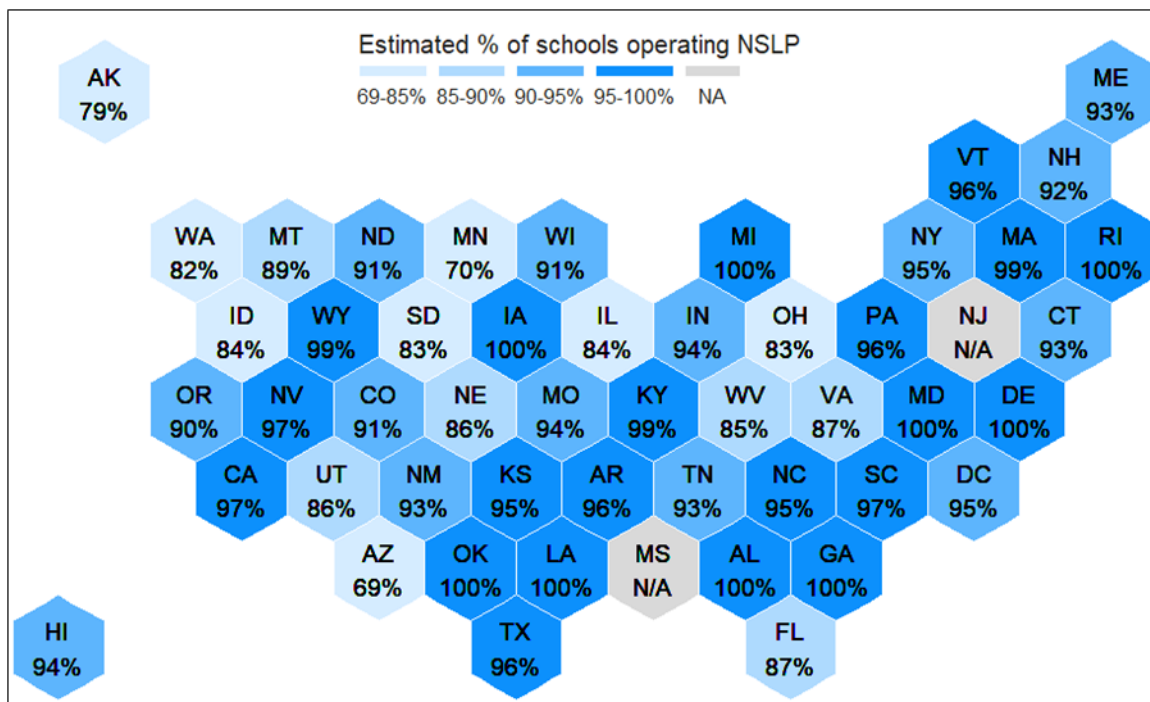
There is limited research on why private schools participate in the school meals programs at lower rates than public schools. One study by the U.S. Government Accountability Office (GAO) in 1993 examined schools that dropped out of NSLP. It found that private schools were more likely to leave the program due to low student enrollment and perceptions of administrative burdens.<sup>47</sup>

Charter schools are less likely to operate NSLP than regular public schools. According to a GAO analysis of ED CCD data, approximately 85% of the nation's 7,600 nonvirtual charter schools operated NSLP in SY2022-2023.<sup>48</sup> GAO found that reasons for lower participation rates among such schools included lack of local financing, inadequate facilities, vendor challenges, staffing challenges, school hours of operation, and less student/household interest.

NSLP and SBP school participation rates vary by state. According to CRS estimates using ED survey data, in SY2022-2023 an estimated 69% to 100% of public schools operated NSLP depending on the state (see **Figure 3** and **Table B-1**).

<sup>47</sup> GAO, *Schools That Left the National School Lunch Program*, December 1993, <https://www.gao.gov/assets/80/78774.pdf>.

<sup>48</sup> GAO, "School Meal Programs: Additional Data and Outreach Could Help Charter School Participation," GAO-25-106846, December 11, 2024, <https://www.gao.gov/products/gao-25-106846>.

**Figure 3. Estimated Percentage of Public Schools Operating NSLP by State, SY2022-2023**

**Source:** CRS calculations based on ED, NCES, CCD for SY2022-2023 (Version 1a).

**Notes:** Rates not shown for Mississippi and New Jersey due to reporting irregularities. States had relatively high response rates (above 95%) to the NSLP question except for Maine, which was missing responses from 6.8% of schools. See **Appendix A** for data sources and limitations and **Table B-1** for additional state statistics, as well as statistics for territories that had data available (the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands).

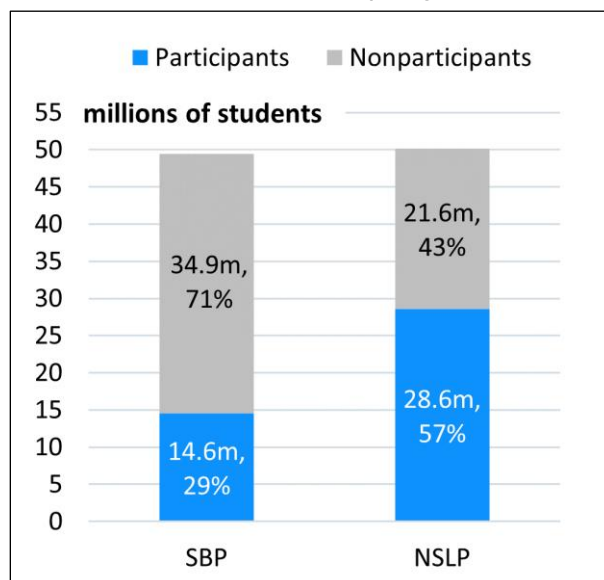
## What proportion of students currently participate in NSLP and SBP?

A school operating NSLP and/or SBP does not mean that all students participate in the programs. On average nationwide, most students do not eat breakfast at school and some bring their own lunch to school.

According to USDA's estimates of meal recipients, within schools that operated NSLP in FY2023 approximately 57% of children received school lunches (either free, at a reduced price, or at full price) (see **Figure 4**). A smaller proportion of children (roughly 30%) received breakfast through SBP. As discussed later in this report (see the section, "Characteristics of Participants and Nonparticipants"), students who participate in school breakfast are more likely to come from lower-income households compared to those who participate in school lunches. Likewise, a higher proportion of breakfasts compared to lunches are reimbursed at the federal free and reduced-price rates.

**Figure 4. School Meals Participants and Nonparticipants, FY2023**

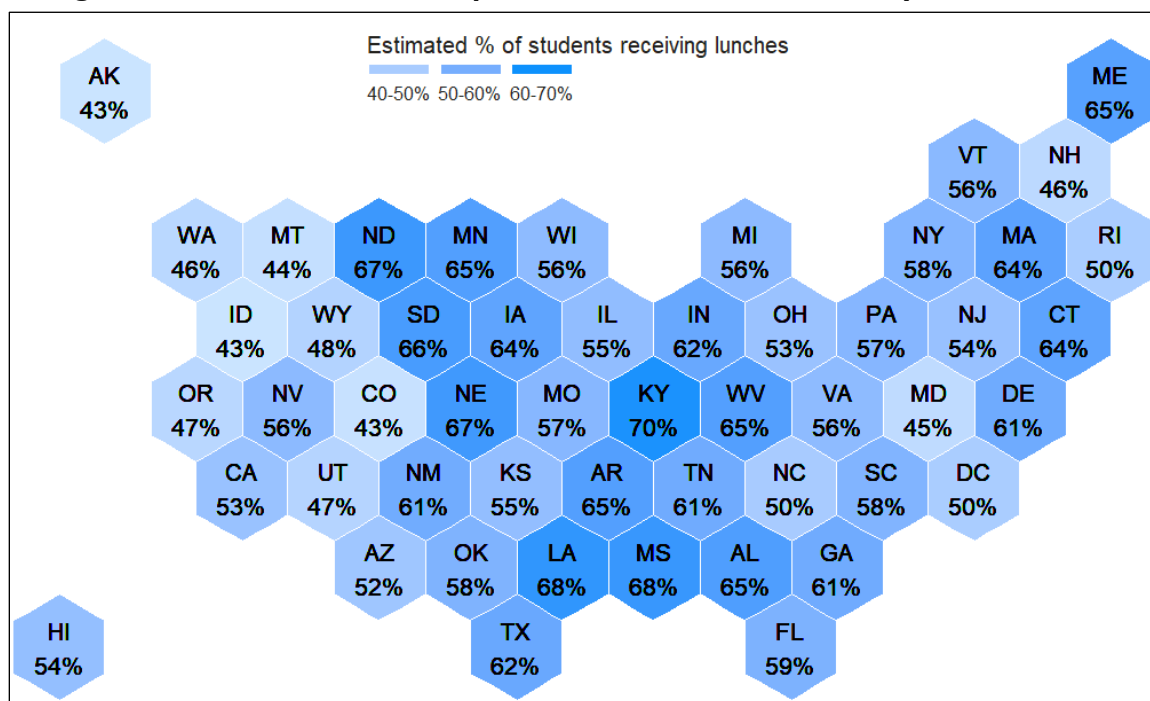
In NSLP- and SBP-Participating Schools



**Source:** USDA, FNS, “June 2024 Keydata Report,” September 13, 2024, p. 8, <https://www.fns.usda.gov/data/june-2024-keydata-report>.

**Notes:** USDA applies a nine-month average of participation over school months in FY2023 to total enrollment in October 2022 to get an estimated participation rate. USDA estimates the number of participants based on meal counts. In addition to schools, the figure includes participation in a small number of residential child care institutions and SSO programs that participate in NSLP and/or SBP during the school year.

**Figure 5** and **Table B-2** show estimated NSLP student participation rates by state using USDA administrative data for FY2023 (October 2022–September 2023). Within schools that operated NSLP, state rates ranged from a low of 43% (Alaska, Colorado, Idaho) to a high of 70% (Kentucky) of students participating in school lunches. Participation rates in this case apply USDA’s estimates of lunch recipients (based on meals served) to USDA data on total enrollment in NSLP schools.

**Figure 5. Student Lunch Participation Rates in NSLP Schools by State, FY2023**

**Source:** CRS, applying FY2023 participation data from USDA, FNS, “Child Nutrition Tables: State Level Tables: FY 2019-2023: National School Lunch: Participation,” <https://www.fns.usda.gov/pd/child-nutrition-tables> (nine-month averages) to fall 2022 (FY2023) enrollment in NSLP schools by state, acquired through communication with USDA, FNS in April 2024.

**Notes:** School food authorities and state agencies estimate the number of NSLP participants based on the number of lunches served. Participant estimates are based on the nine-month school year, while student enrollment estimates are based on October data. **Table B-2** presents additional statistics, including rates for territories that had data available.

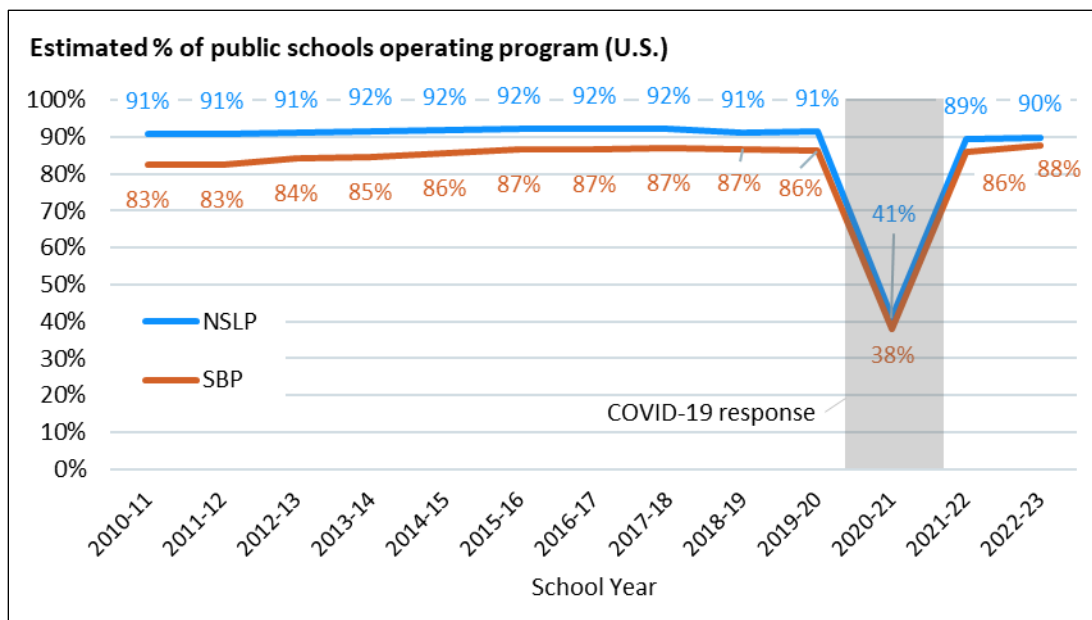
## Recent Trends in Participation and Spending

### Trends in School Operation of NSLP and SBP

The estimated percentage of public schools participating in NSLP remained relatively stable from SY2010-2011 to SY2022-2023, except for SY2020-2021 (discussed further in the “COVID-19 Pandemic” section) (see **Figure 6**). Meanwhile, the estimated percentage of public schools operating SBP grew from 83% in SY2010-2011 to 88% in SY2022-2023. This is consistent with a historic upward trend in schools adopting SBP since the program’s inception in 1975.<sup>49</sup>

<sup>49</sup> In 1989, the number of schools operating SBP was less than half the number operating NSLP. As of SY2023-2024, that difference had largely dissipated (roughly 92,100 schools participating in SBP versus 94,000 schools in NSLP).

**Figure 6. Trends in Public School Participation in NSLP and SBP, SY2010-2011 to SY2022-2023**



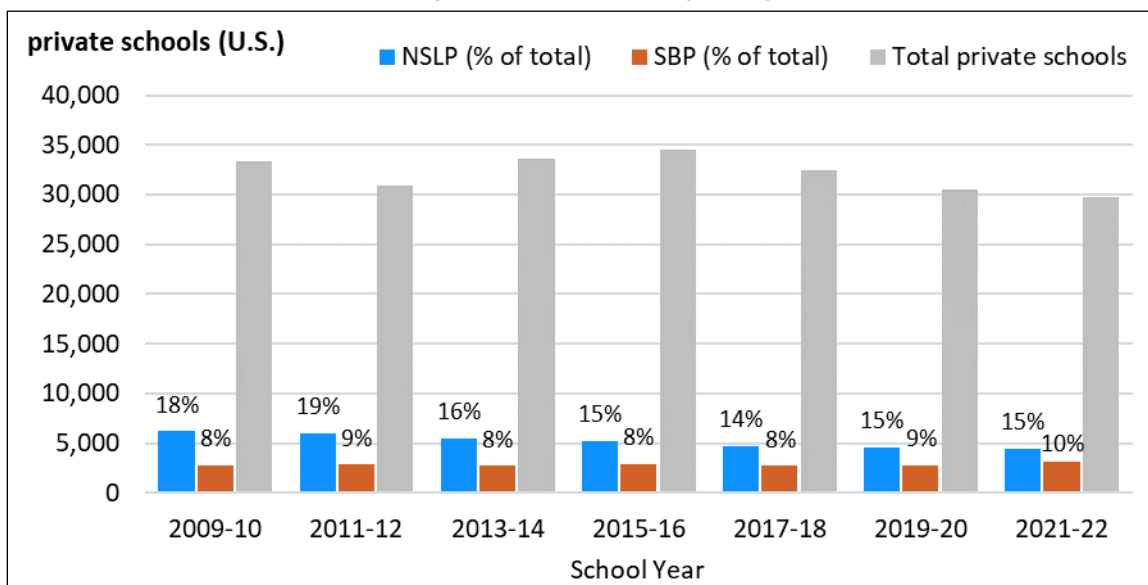
**Source:** CRS estimates, applying the number of NSLP and SBP public schools acquired from USDA, FNS in April 2024 to the total number of operational public elementary and secondary schools from the NCES CCD. Both datasets are based on state reports collected in the fall of the school year.

**Notes:** Percentages are estimates that are subject to error. The estimate for NSLP in SY2022-2023 differs from the estimate (92%) presented in **Figure 2** so that a consistent dataset could be used for the 2010-2022 period. In SY2020-2021, many school food authorities were serving free breakfasts and lunches through SFSP in lieu of NSLP/SBP as a result of COVID-19-pandemic response policies.

Among private schools, estimated NSLP participation declined from approximately 18% in SY2009-2010 to 15% in SY2021-2022 (the most recent year data are available). SBP participation increased from an estimated 8% in SY2009-2010 to 10% in SY2021-2022 (**Figure 7**).

**Figure 7. Trends in Private School Participation in NSLP and SBP, SY2009-2010 to SY2021-2022**

Estimated Percentage of Private Schools Operating NSLP and SBP



**Source:** CRS estimates. The number of private schools operating NSLP and SBP was acquired through communication with USDA, FNS in April 2024 and applied to the total number of private schools in the United States from ED, NCES, PSS, 2021-2022.

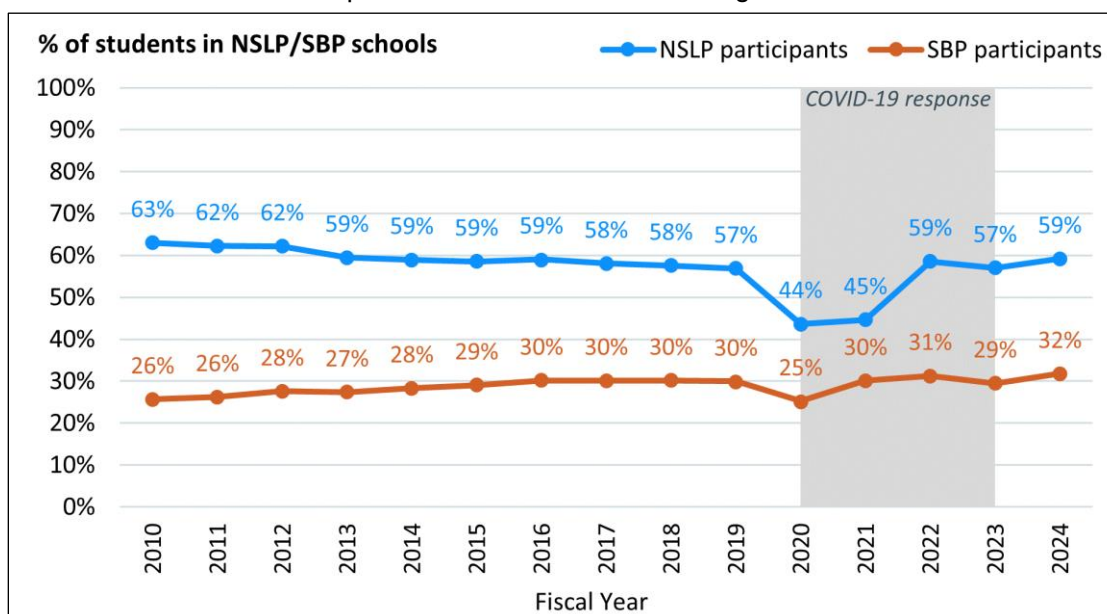
**Note:** Percentages are estimates and subject to error.

## Trends in Student Participation in NSLP and SBP

Within schools participating in NSLP, student lunch participation rates reached a peak of 63% in FY2010. Since then, lunch participation rates have hovered around 57%-59% (aside from pandemic years), which is similar to the rates during the 1990s and early 2000s. Student breakfast participation in SBP-participating schools has generally been rising, consistent with long-term trends. **Figure 8** shows NSLP and SBP student participation trends since FY2010. **Figure C-1** displays longer-term student participation rates.

**Figure 8. Trends in NSLP and SBP Student Participation, FY2010-FY2024**

Estimated Meal Recipients, Out of All Students Attending NSLP and SBP Schools



**Source:** CRS, applying estimated participants from USDA, FNS, “Child Nutrition Tables: National Level Annual Summary Tables: FY 1969-2023,” as of January 10, 2025, <https://www.fns.usda.gov/pd/child-nutrition-tables> (nine-month averages) to total enrollment in NSLP and SBP schools for FY2010-FY2023 (fall data) acquired from USDA, FNS in June 2024 and, for FY2024 enrollment, USDA, FNS, “October 2024 Keydata Report,” January 10, 2025, <https://www.fns.usda.gov/data/October-2024-keydata-report>.

**Notes:** “Fiscal Year” refers to the accounting period of the federal government that begins on October 1 and ends on September 30 of the next calendar year (e.g., FY2024 refers to October 1, 2023, through September 30, 2024). In FY2020 and FY2021, participation in NSLP and SBP was lower than normal due to COVID-19-pandemic response policies that enabled universal free meals under SFSP from March 2020 through SY2020-2021.

Research has shed light on some of the factors that contribute to changes in school meals participation. Changes in the K-12 student population, and the number of low-income students in particular, can affect participation. Public elementary and secondary school enrollment increased over the 2011 to 2019 period before declining and reaching a low point in fall 2020 during the COVID-19 pandemic.<sup>50</sup> While enrollment has ticked back up slightly, according to predictions from ED’s NCES it is expected to decline between fall 2023 and fall 2031.<sup>51</sup> In addition, changes in the low-income student population can have an outsized effect on participation in school meals, because students eligible for free and reduced-price meals participate at higher rates. For example, according to GAO and USDA Economic Research Service (ERS) research, higher household poverty levels (and increased eligibility for free and reduced-price meals) contributed to increased school meals participation following the Great Recession.<sup>52</sup> Child poverty rates have

<sup>50</sup> ED, NCES, CCD, “Table 203.20. Enrollment in public elementary and secondary schools, by region, state, and jurisdiction: Selected years, fall 1990 through fall 2023,” *Digest of Education Statistics*, prepared December 2023, [https://nces.ed.gov/programs/digest/d24/tables/dt24\\_203.20.asp](https://nces.ed.gov/programs/digest/d24/tables/dt24_203.20.asp).

<sup>51</sup> ED, NCES, CCD, “Table 203.20. Enrollment in public elementary and secondary schools, by region, state, and jurisdiction: Selected years, fall 1990 through fall 2031,” *Digest of Education Statistics*, prepared December 2023, [https://nces.ed.gov/programs/digest/d23/tables/dt23\\_203.20.asp](https://nces.ed.gov/programs/digest/d23/tables/dt23_203.20.asp).

<sup>52</sup> USDA, ERS, “How Economic Conditions Affect Participation in USDA Nutrition Assistance Programs,” EIB-100, September 2012, <https://www.ers.usda.gov/publications/pub-details/?pubid=43668>; and GAO, “School Lunch: (continued...) ”

generally been on the decline for decades; however, there was an uptick in child poverty in 2022 and 2023 compared to recent prior years.<sup>53</sup> Other research has suggested that having a working mother increases participation in school lunches, but not breakfasts, and Bureau of Labor Statistics data suggest that maternal labor force participation has generally trended upward since 2010.<sup>54</sup>

Policy changes can also affect school meals participation. GAO found that the implementation of direct certification for free school meals with SNAP resulted in lunch participation gains around 2010.<sup>55</sup> The same GAO report, as well as other analyses, found a decline in school lunch participation post-2010 that was potentially related to the implementation of policies in the Healthy, Hunger-Free Kids Act of 2010, including updated nutrition standards for school meals and increased lunch prices for students paying full price for meals.<sup>56</sup> Other studies have focused on school meals interventions and policies, finding that universal free meals policies, alternative modes of breakfast service (discussed below), and restrictions on *competitive foods* that students can buy in schools (e.g., vending machine foods) were all linked to increased school meals participation.<sup>57</sup> (Participating in school meals is different than consuming a meal, which other research has addressed.<sup>58</sup>)

USDA's ERS and others have also found a link between school lunch prices and student participation (e.g., as prices increase, participation decreases).<sup>59</sup> One study found a price elasticity of 0.33 for school lunches, meaning that a 10% increase in price would reduce the number of

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Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed," GAO-14-104, January 2014, pp. 15-19, <https://www.gao.gov/assets/gao-14-104.pdf>.

<sup>53</sup> D. Thomson et al., "Lessons From a Historic Decline in Child Poverty," *Child Trends*, <https://www.childtrends.org/publications/lessons-from-a-historic-decline-in-child-poverty>; and C.M. Padilla and D. Thomson, "Nearly 1 Million More Children Were in Poverty in 2023 Than 2022, Despite Economic Growth," *Child Trends*, September 10, 2024, <https://www.childtrends.org/publications/more-children-in-poverty-in-2023-than-2022-economic-growth>.

<sup>54</sup> Ashlesha Datar and Nancy Nicosia, "Outsourcing Meals: Effects of Maternal Work on Children's School Meal Participation," *Social Service Review*, vol. 86, no. 4 (2012), pp. 565-593. For trends in maternal labor force participation, see Charles S. Gascon, "Are Parents' Labor Participation Rates Returning to Pre-Pandemic Levels?," April 18, 2023, Federal Reserve Bank of St. Louis (using Bureau of Labor Statistics data), <https://www.stlouisfed.org/on-the-economy/2023/apr/parents-labor-participation-rates-returning-pre-pandemic-levels>.

<sup>55</sup> GAO, *School Lunch: Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed*, GAO-14-104, January 2014, pp. 15-19, <https://www.gao.gov/assets/gao-14-104.pdf> (hereinafter, "GAO, *School Lunch: Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed*, GAO-14-104").

<sup>56</sup> GAO, *School Lunch: Implementing Nutrition Changes Was Challenging and Clarification of Oversight Requirements Is Needed*, GAO-14-104, pp. 15-24; Katherine Ralston and Constance Newman, "School Meals in Transition," USDA, ERS, Economic Information Bulletin Number 143, August 2015; and Gregory Golino, Katherine Ralston, and Joanne Guthrie, "Participation Trends for Full Price Meals in the National School Lunch Program," *Applied Economic Perspectives and Policy*, vol. 43, no. 3 (2021), pp. 1161-1175.

<sup>57</sup> Juliana F.W. Cohen et al., "Strategies to Improve School Meal Consumption: A Systematic Review," *Nutrients*, vol. 13, no. 10 (2021), p. 3520; Juliana F.W. Cohen et al., "Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review," *Nutrients* 13(3), 2021: 911, pp. 4-6; and Michah W. Rothbart, Amy Ellen Schwartz, and Emily Gutierrez, "Paying for Free Lunch: The Impact of CEP Universal Free Meals on Revenues, Spending, and Student Health," *Education Finance and Policy*, vol. 18, no. 4 (2023), pp. 708-737.

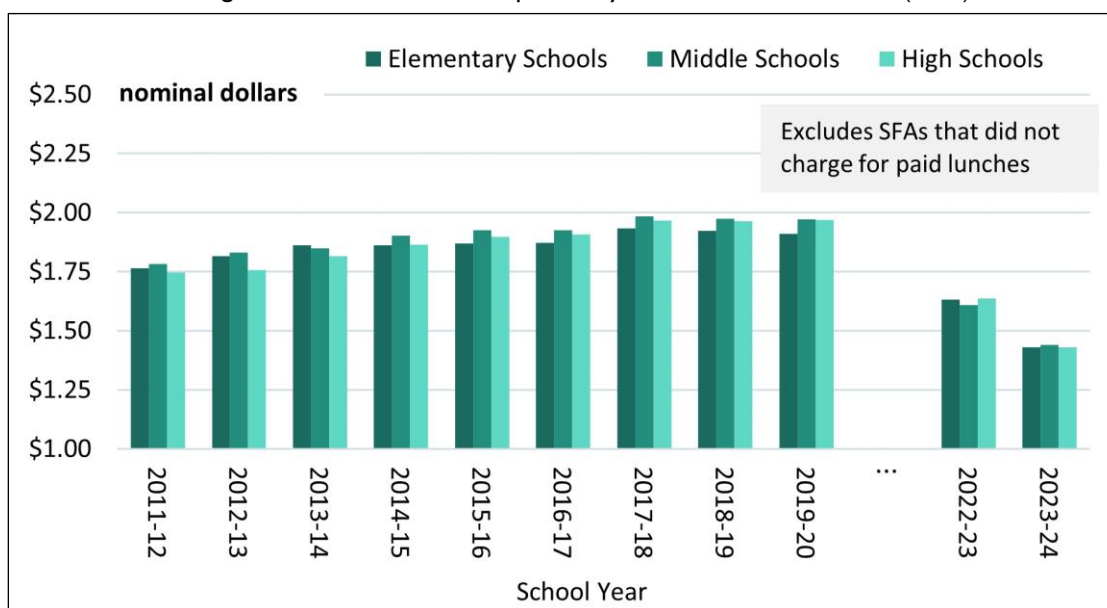
<sup>58</sup> For example, see Juliana F.W. Cohen et al., "Strategies to Improve School Meal Consumption: A Systematic Review," *Nutrients*, vol. 13, no. 10 (2021), p. 3520.

<sup>59</sup> For example, see USDA, ERS, "How Economic Conditions Affect Participation in USDA Nutrition Assistance Programs," EIB-100, September 2012, <https://www.ers.usda.gov/publications/pub-details/?pubid=43668>; and Gregory Golino, Katherine Ralston, and Joanne Guthrie, "Participation Trends for Full Price Meals in the National School Lunch Program," *Applied Economic Perspectives and Policy*, vol. 43, no. 3 (2021), pp. 1161-1175.

lunches purchased by an estimated 3.3%.<sup>60</sup> There is some evidence that schools and school districts have lowered lunch prices in recent school years. According to administrative data from USDA collected from school food authorities, the average price of a paid lunch decreased by roughly 50 cents across school types (elementary, middle, and high schools) in SY2023-2024 compared to SY2019-2020 (**Figure 9**).<sup>61</sup> While lower prices might be expected to boost participation, paid lunch counts were roughly the same in FY2019 and FY2024 (see **Figure 13**).

**Figure 9. Trends in School Lunch Prices, SY2011-2012 to SY2023-2024**

Average Price of a Paid Lunch Reported by School Food Authorities (SFAs)



**Source:** USDA, FNS, “FNS-828 School Food Authority Paid Lunch Price Report Data,” accessed July 1, 2023, <https://www.fns.usda.gov/data/fns-828-school-food-authority-paid-lunch-price-report-data>.

**Notes:** CRS excluded states operating universal free meals programs and SFAs that reported no charges for paid lunches. SY2020-2021 and SY2021-2022 are not shown, as FNS issued reporting waivers due to the COVID-19 pandemic.

The quality and palatability of meals is another factor that can affect participation. Some research indicates that students are more likely to participate in lunches when they are healthier or perceived as healthier.<sup>62</sup> However, there is limited research on how students’ perceptions of the quality and palatability of meals has changed over time.

Student participation in SBP has generally been increasing over time (with the exception of 2020). As noted previously, an increasing number of schools have adopted SBP, which enables

<sup>60</sup> Gregory Golino, Katherine Ralston, and Joanne Guthrie, “Participation Trends for Full Price Meals in the National School Lunch Program,” *Applied Economic Perspectives and Policy*, vol. 43, no. 3 (2021), p. 1169.

<sup>61</sup> USDA, FNS, “FNS-828 School Food Authority Paid Lunch Price Report Data,” March 1, 2023, <https://www.fns.usda.gov/data/fns-828-school-food-authority-paid-lunch-price-report-data>.

<sup>62</sup> USDA, FNS, Office of Policy Support, “School Nutrition and Meal Cost Study (SNMCS), Final Report Volume 4: Student Participation, Satisfaction, Plate Waste, and Dietary Intakes,” April 2019, p. 53, <https://www.fns.usda.gov/school-nutrition-and-meal-cost-study>; Marisa Tsai et al., “Student Perception of Healthfulness, School Lunch Healthfulness, and Participation in School Lunch: The Healthy Communities Study,” *Journal of Nutrition Education and Behavior*, vol. 51, no. 5 (2019), pp. 623-628; and Sarah Martinelli et al., “Parental Perceptions of the Nutritional Quality of School Meals and Student Meal Participation: Before and After the Healthy Hunger-Free Kids Act,” *Journal of Nutrition Education and Behavior*, vol. 52, no. 11 (2020), pp. 1018-1025.

more students to participate. The aforementioned ERS study found that trends in school adoption of SBP—more so than changes in economic conditions—affected SBP student participation rates.<sup>63</sup> School breakfasts have also become more accessible over the past few decades as a result of alternative breakfast options such as grab-and-go meals and breakfast in the classroom, which research has linked to increased participation.<sup>64</sup> In addition, an increase in universal free meals (discussed in the next session) could be impacting breakfast participation, as schools that adopt CEP are generally required to operate SBP.<sup>65</sup>

## Increase in Free Meals

In recent years, an increasing percentage of NSLP schools have adopted universal free meals programs—through which all students eat for free—under federal and state policies (discussed in the “Background on NSLP and SBP” section).

**Figure 10** shows that as of fall 2023, an estimated 60% of NSLP schools provided universal free school meals to students through either a state or federal option. While the percentage of Provision 2 and Provision 3 schools has declined over time, the percentage of schools adopting CEP has more than tripled: from 14% in fall 2014 (the first year of national CEP implementation) to 46% in fall 2023 (including CEP schools in universal states).<sup>66</sup> Schools operating under state-funded universal meals programs have also increased over the past couple of years, comprising approximately 15% of NSLP schools in fall 2022 and 23% in fall 2023.

As discussed earlier in this report, federal funding was provided for universal meals during the COVID-19 pandemic. In SY2020-2021, an estimated 54% of NSLP schools provided universal free meals through SSO, and others provided universal free meals through SFSP (not shown in **Figure 10**). In SY2021-2022, an estimated 96% of NSLP schools provided universal free meals through SSO and the remaining 4% of schools transitioned back to normal program operations.

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<sup>63</sup> USDA, ERS, “How Economic Conditions Affect Participation in USDA Nutrition Assistance Programs,” EIB-100, September 2012, p. 28, <https://www.ers.usda.gov/publications/pub-details/?pubid=43668>.

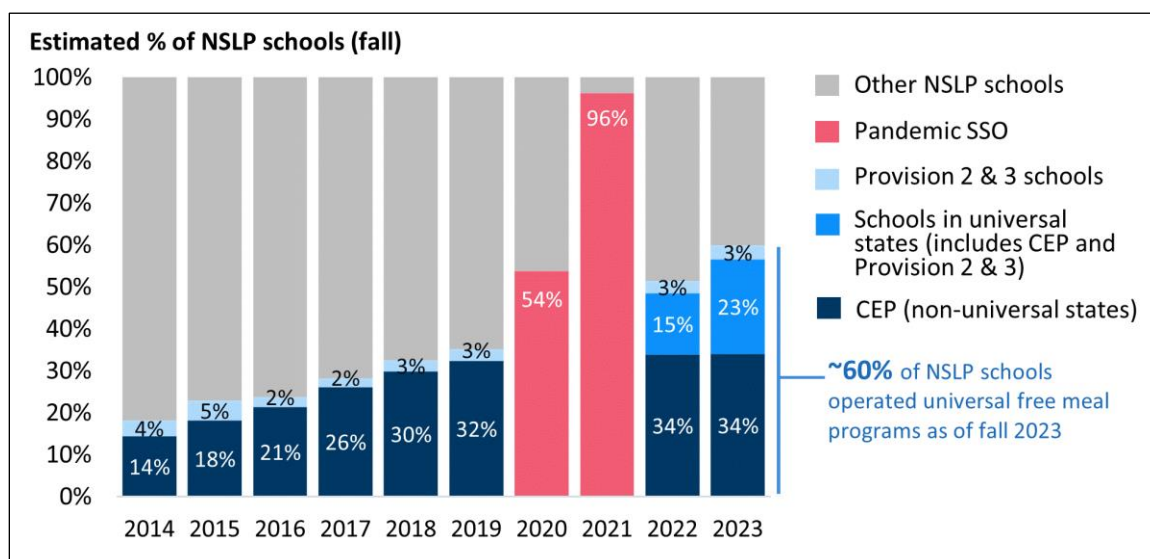
<sup>64</sup> For example, see D. Ferris et al., “Increased School Breakfast Participation from Policy and Program Innovation: The Community Eligibility Provision and Breakfast after the Bell,” *Nutrients*, vol. 14, no. 3 (January 2022); D. Olarte et al., “Alternative School Breakfast Service Models and Associations with Breakfast Participation, Diet Quality, Body Mass Index, Attendance, Behavior, and Academic Performance: A Systematic Review,” *Nutrients*, vol. 15, no. 13 (June 2023); and Juliana F.W. Cohen et al., “Strategies to Improve School Meal Consumption: A Systematic Review,” *Nutrients*, vol. 13, no. 10 (2021), p. 3520.

<sup>65</sup> 7 C.F.R. §245.9(f)(3)(ii).

<sup>66</sup> Fall 2023 data may include some schools that became eligible to participate in CEP as a result of USDA’s decision to lower the CEP eligibility threshold to a 25% ISP starting October 26, 2023.

**Figure 10. Share of NSLP Schools Operating Universal Free Meals Programs, 10-Year Trend**

Fall 2014-Fall 2023



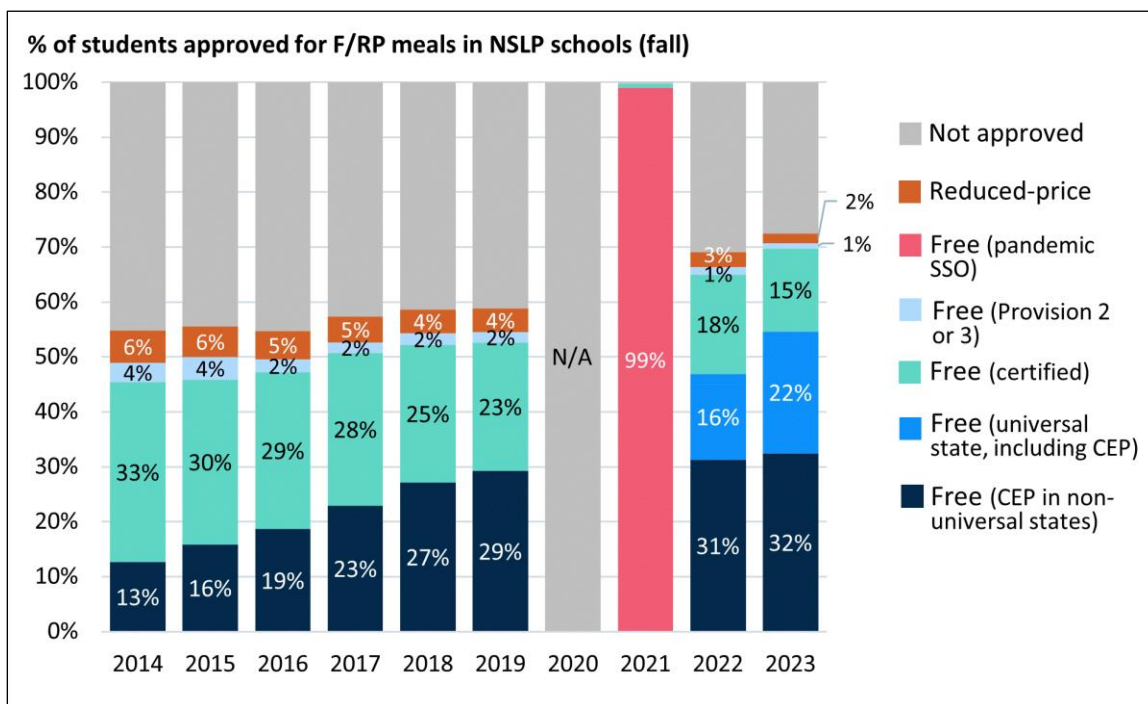
**Source:** CRS-calculated proportions using USDA FNS-742 administrative data except for fall 2020 and fall 2021. Fall 2020 figure is a survey-based estimate for September 2020 from USDA, FNS, “Child Nutrition Program Operations During the COVID-19 Pandemic, March through September 2020: School Meals Operations Study (SMO) Year 1 Report,” prepared by Mathematica, p. C.4, <https://www.fns.usda.gov/research/cn/pandemic-operations-march-sept-2020>. Fall 2021 figure is based on administrative data acquired from FNS in June 2024.

**Notes:** The “Schools in universal states” category includes some schools that are operating and getting federal reimbursement under CEP, Provision 2, or Provision 3. Pandemic SSO = NSLP Seamless Summer Option as operated under COVID-19-pandemic response waivers. In SY2021-2022, all schools had the option of offering universal free meals under the NSLP SSO. In SY2020-2021, NSLP uptake was lower because many schools instead provided universal free meals under the SFSP under COVID-19-pandemic response policies.

Altogether, an estimated 71% of students in NSLP and/or SBP schools were *approved* to receive free school meals in fall 2023 (see **Figure 11**; numbers on chart add to 70% due to rounding) because they attended a CEP school or were approved through a state-funded universal free meals program or through regular free meals certifications.<sup>67</sup> (This does not mean that 71% of students *received* free meals in practice; see **Appendix A** for a discussion of the limitations of meal receipt data). Two percent of students were certified for reduced-price meals, and the remainder (27%) had to pay full price for school meals.

<sup>67</sup> This number excludes any students receiving free meals as a result of a local school or school district policy.

**Figure 11. Share of Students Approved for Free and Reduced-Price School Meals, 10-Year Trend**  
Fall 2014-Fall 2023



**Source:** CRS calculations based on USDA FNS-742 data acquired through CRS communication with FNS in summer 2024.

**Notes:** F/RP = free or reduced-price. Students who are not approved for free or reduced-price meals may still purchase full-price school meals (subsidized at the federal paid rate). Fall 2020 data are not available due to COVID-19-pandemic response policies, under which most students received free meals. In SY2021-2022, USDA estimated that 99% of students received universal free meals through NSLP SSO (CRS communication with USDA, FNS in June 2024).

## Trends in Federal Spending on NSLP and SBP

In general, federal school meal spending has trended upward since 2010, with significant fluctuations during the COVID-19 pandemic. However, the spending curve tends to flatten when looking at inflation-adjusted spending.

Federal spending on NSLP and SBP has not increased to the same degree as student eligibility for free meals. One reason is that some states are covering the costs of universal free meal programs (e.g., a student may receive a free meal under a state universal program but the school would receive the federal *paid* rate for that meal if the student did not qualify for free or reduced-price meals under federal eligibility rules). In addition, rising CEP adoption does not always result in increased federal spending on school meals (as discussed in “Schools that Participate in the Community Eligibility Provision or Provision 1, 2, or 3”).

This section presents recent spending data on NSLP and SBP and discusses the factors that contribute to spending on the programs. (For a discussion of how funding for school meals works, see the “Background on NSLP and SBP” section).

## Spending at a Glance

As shown in **Figure 12**, actual spending on NSLP and SBP experienced growth from FY2010 to FY2019 until the COVID-19 pandemic. Real (inflation-adjusted) spending appeared to level off in FY2016-FY2019. As a result of school closures in spring 2020 and a shift to SFSP meals in SY2020-2021 (discussed in the “COVID-19 Pandemic” section), NSLP and SBP spending declined in FY2020 and FY2021. Spending then rebounded, peaking in FY2022 as universal free meals were offered through NSLP/SBP SSO in SY2021-2022.<sup>68</sup> While the programs subsequently transitioned back to pre-pandemic rules,<sup>69</sup> P.L. 117-158 temporarily increased meal reimbursements in SY2022-2023, affecting spending at the end of FY2022 and in FY2023.

In FY2024, actual (nominal) spending on NSLP and SBP increased compared to both FY2023 and FY2019 (the last pre-pandemic year). However, when adjusting for food price inflation, spending declined for NSLP and SBP in FY2024 compared to FY2019.<sup>70</sup>

**Figure C-2** displays historical trends in actual and adjusted spending.

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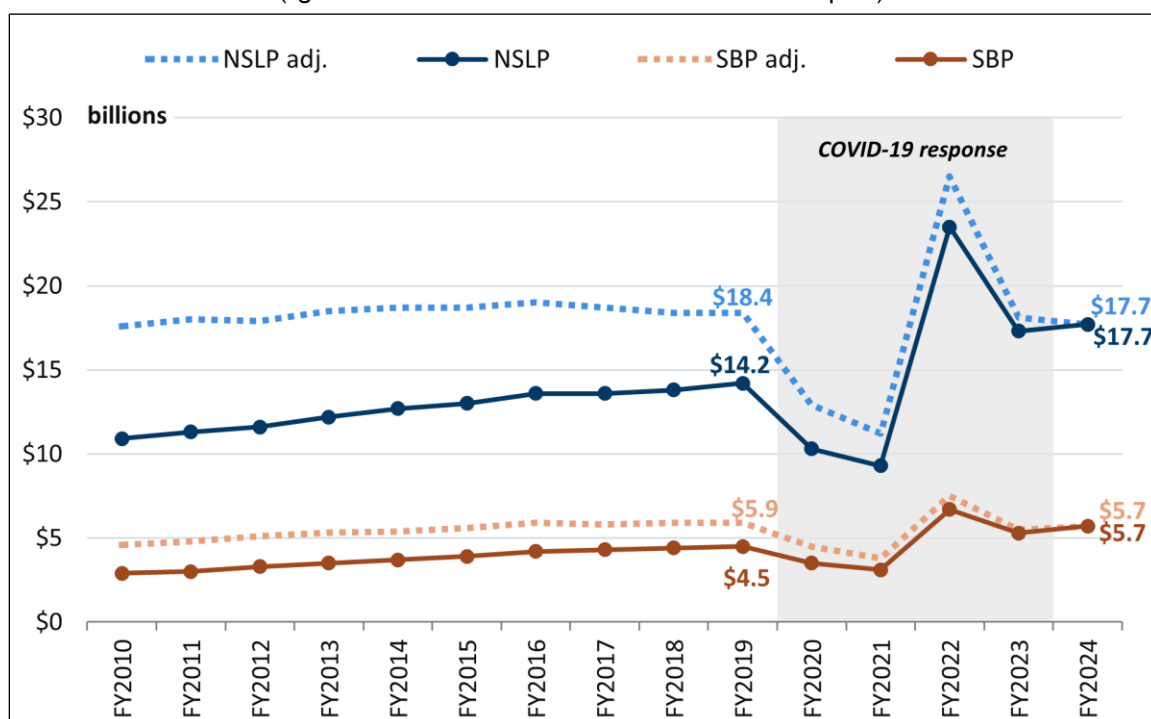
<sup>68</sup> For another analysis of pre- and post-pandemic spending on NSLP and SBP, see USDA, ERS, “The Food and Nutrition Assistance Landscape: Fiscal Year 2023 Annual Report,” Report No. EIB-274, June 2024, pp. 12-15.

<sup>69</sup> USDA continued to offer certain pandemic waivers on a limited basis in SY2022-2023, as discussed in USDA, FNS, “Transitioning to Normal Child Nutrition Operations: Additional Waiver Opportunities,” May 23, 2022, <https://www.fns.usda.gov/cn/transitioning-normal-child-nutrition-operations-additional-waiver-opportunities>.

<sup>70</sup> CRS adjusted spending figures for inflation using the U.S. Bureau of Labor Statistics, Consumer Price Index for All Urban Consumers’ (CPI-U’s) food away from home index (not seasonally adjusted)—the index used to adjust school meal reimbursement rates.

**Figure 12. Trends in NSLP and SBP Spending, FY2010-FY2024**

Actual versus Inflation-Adjusted Expenditures  
(figure is interactive in the HTML version of this report)



**Source:** Expenditures are from USDA, FNS, “Child Nutrition Tables: NSLP, SBP and SMP - Program Costs—Cash and Commodities,” January 10, 2025, <https://www.fns.usda.gov/pd/child-nutrition-tables>. Inflation-adjusted amounts are in FY2024 dollars, adjusted for inflation by CRS using the CPI-U, food away from home in U.S. city average, all urban consumers, not seasonally adjusted, from the U.S. Bureau of Labor Statistics.

**Notes:** FY2024 data are preliminary. The figure includes spending on per-meal cash reimbursements (including federal reimbursements for universal free meals under SSO in SY2021-2022, largely affecting FY2022, and supplemental reimbursements provided under P.L. 117-158, affecting the end of FY2022 and most of FY2023) and commodity foods. The figure excludes other supplemental funds and program costs such as state administrative expenses, which are funded separately. In FY2020 and FY2021, NSLP and SBP costs do not reflect all meals served to schoolchildren due to COVID-19-pandemic response policies that enabled meal service through SFSP from March 2020 through SY2020-2021.

**Figure 12** captures the majority of, but not all, federal school meal spending. Types of spending not included in the figure include federal spending on states’ child nutrition program administrative expenses (\$350 million in FY2024) and other child nutrition expenses (\$225 million in FY2024), including grants that support NSLP and SBP, such as school meal equipment grants, farm to school grants, and computer/technology grants; and federal administrative costs and research activities.<sup>71</sup> In addition, the figure excludes supplemental *Supply Chain Assistance Funds* that USDA made available to school food authorities in SY2021-2022 through SY2023-2024 via the Commodity Credit Corporation (discussed in the “COVID-19 Pandemic” section).

<sup>71</sup> FY2024 estimates are preliminary and are from USDA, FNS, “October 2024 Keydata Report,” January 10, 2025. For information on other school meal-related spending, see CRS Report R46234, *School Meals and Other Child Nutrition Programs: Background and Funding*.

## What factors contribute to school meals spending?

Because most NSLP and SBP funding is provided as meal reimbursements, federal spending on school meals is affected by participation (the number of free, reduced-price, and paid meals served) as well as annual inflation adjustments to school meals reimbursement rates. In some years, NSLP and SBP spending has also been affected by the availability of supplemental funding (e.g., in FY2022 and FY2023).

## Changes to School Meals Reimbursement Rates

Per statute, USDA must adjust the cash reimbursement rates for free, reduced, and paid meals for inflation using the Food Away From Home series of the CPI-U on an annual basis.<sup>72</sup> The smaller amount of federal funding for USDA-purchased commodities is also provided on a per-meal reimbursement basis, adjusted annually to reflect changes in a three-month average value of the Producer Price Index for Foods Used in Schools and Institutions, as required by statute.<sup>73</sup>

As shown in **Table 2**, school meals cash reimbursement rates experienced positive rates of change in every year since SY2010-2011, with the highest increases occurring in recent years due to high food price inflation.<sup>74</sup>

**Table 2. Year-to-Year Change in NSLP and SBP Cash Reimbursement Rates, SY2010-2011 through SY2024-2025**

School Year	Year-to-Year Percentage Change in NSLP and SBP Reimbursement Rates
2010-2011	1.1%
2011-2012	2.2%
2012-2013	2.9%
2013-2014	2.3%
2014-2015	2.2%
2015-2016	3.0%
2016-2017	2.6%
2017-2018	2.3%
2018-2019	2.7%
2019-2020	2.9%
2020-2021	2.9%

<sup>72</sup> Sections 4 and 11 of the Richard B. Russell National School Lunch Act (42 U.S.C. §1753 and 42 U.S.C. §1759a) and Section 4 of the Child Nutrition Act of 1966 (42 U.S.C. §1773). For SY2024-2025 NSLP and SBP cash reimbursement rates, see USDA, FNS, “National School Lunch, Special Milk, and School Breakfast Programs, National Average Payments/Maximum Reimbursement Rates,” 89 *Federal Register* 56720, July 10, 2024, <https://www.federalregister.gov/documents/2024/07/10/2024-15175/national-school-lunch-special-milk-and-school-breakfast-programs-national-average-paymentsmaximum>.

<sup>73</sup> Section 6(c)(1)(B) of the Richard B. Russell National School Lunch Act (42 U.S.C. §1755(c)). For SY2024-2025 rates, see USDA, FNS, “Food Distribution Program: Value of Donated Foods From July 1, 2024, Through June 30, 2025,” 89 *Federal Register* 56286, July 9, 2024, <https://www.federalregister.gov/documents/2024/07/09/2024-15031/food-distribution-program-value-of-donated-foods-from-july-1-2024-through-june-30-2025>.

<sup>74</sup> USDA, ERS, “Food Price Outlook, 2025,” January 24, 2025, <https://www.ers.usda.gov/data-products/food-price-outlook/summary-findings>.

School Year	Year-to-Year Percentage Change in NSLP and SBP Reimbursement Rates
2021-2022	4.0%
2022-2023	7.4%
2023-2024	8.3%
2024-2025	4.0%

**Source:** CRS, based on school meal reimbursement rate notices, available at <https://www.fns.usda.gov/school-meals/reimbursement-rates> and in the *Federal Register*.

**Note:** Year-to-year change reflects the percentage change compared to the prior school year (e.g., reimbursements in SY2024-2025 were 4.0% higher than in SY2023-2024).

### *Changes in Meals Served (Participation)*

**Figure 13** shows that the number of free and reduced-price lunches served through NSLP has remained relatively stable since FY2010, with the exception of COVID-19-pandemic response years. Paid lunches experienced a decline until the pandemic—when they fluctuated significantly—and then returned to pre-pandemic levels in FY2023 and FY2024.

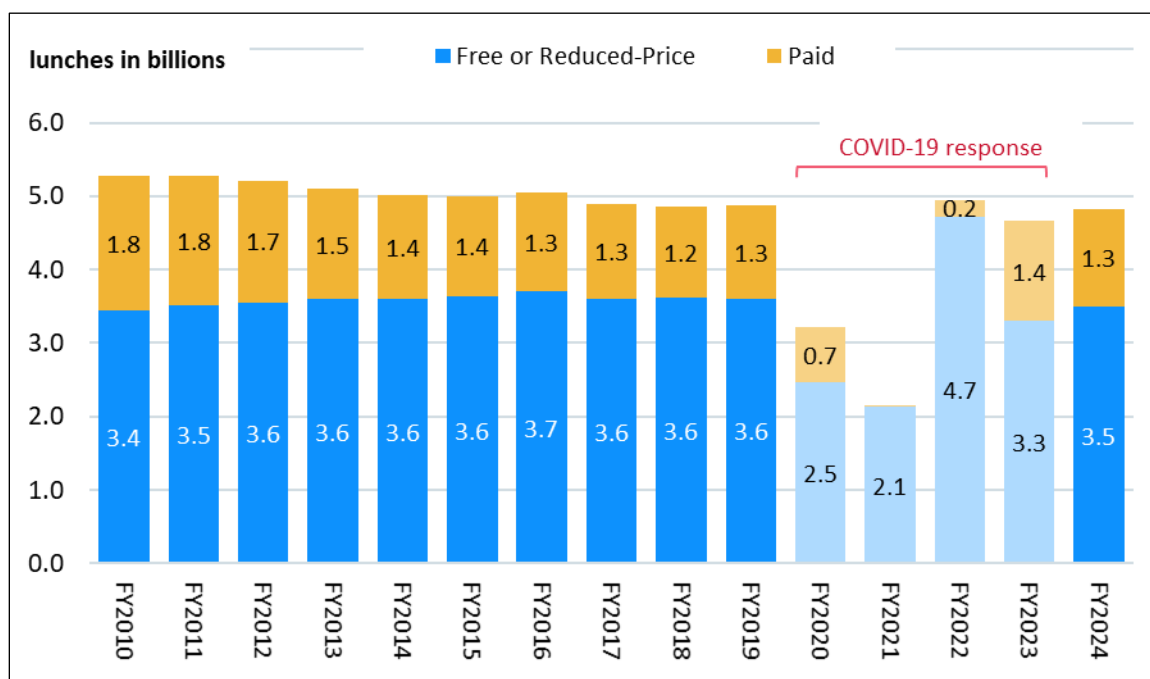
While increasing adoption of CEP and state-funded universal meals policies might have been expected to increase student participation in school meals (and federal reimbursements),<sup>75</sup> it is possible that declining K-12 enrollment and other factors had the opposite effect on participation.<sup>76</sup>

<sup>75</sup> For example, see J. Cohen et al., “Universal School Meals and Associations with Student Participation, Attendance, Academic Performance, Diet Quality, Food Security, and Body Mass Index: A Systematic Review,” *Nutrients*, vol. 13, no. 911 (2021), pp. 4-6; and Michah W. Rothbart, Amy Ellen Schwartz, and Emily Gutierrez, “Paying for Free Lunch: The Impact of CEP Universal Free Meals on Revenues, Spending, and Student Health,” *Education Finance and Policy*, vol. 18, no. 4 (2023), pp. 708-737.

<sup>76</sup> ED, NCES, CCD, “Table 203.20. Enrollment in public elementary and secondary schools, by region, state, and jurisdiction: Selected years, fall 1990 through fall 2031,” *Digest of Education Statistics*, prepared December 2023, [https://nces.ed.gov/programs/digest/d23/tables/dt23\\_203.20.asp](https://nces.ed.gov/programs/digest/d23/tables/dt23_203.20.asp).

**Figure 13. Federally Reimbursed Lunches by Category, FY2010-FY2024**

Number of Lunches Reimbursed at Free/Reduced-Price versus Paid Rates



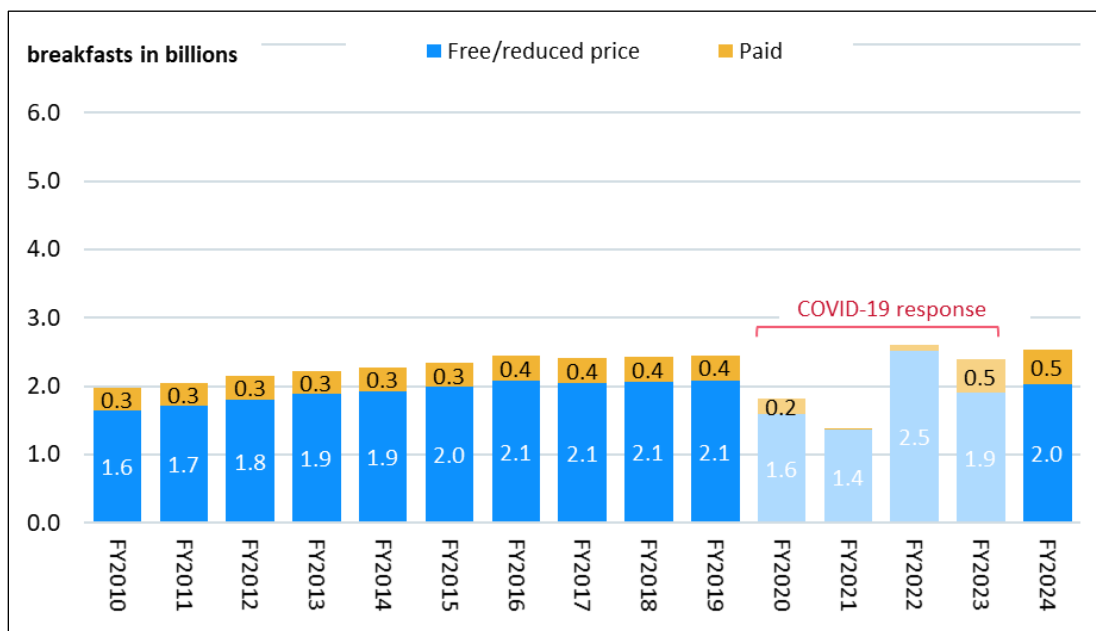
**Source:** CRS, using data from USDA, FNS, “Child Nutrition Dashboard,” accessed January 6, 2025, <https://www.fns.usda.gov/data-research/data-visualization/child-nutrition-dashboard>. FY2024 estimates (preliminary) are from USDA, FNS, “October 2024 Keydata Report,” January 10, 2025.

**Notes:** FY2024 data are preliminary. Due to CEP’s reimbursement formula, a portion of lunches served under CEP are counted in the *paid* category, even though all students eat for free (discussed in the section, “Schools that Participate in the Community Eligibility Provision or Provision 1, 2, or 3”). COVID-19-pandemic response policies affected FY2020-FY2023, as discussed throughout this report.

Breakfasts experienced a different trend. In general, the number of federally reimbursed school breakfasts increased from FY2010 to FY2019, prior to the COVID-19 pandemic. As of FY2024, the increase in free and reduced-price breakfast reimbursements had leveled off, while paid breakfast reimbursements continued to rise (see **Figure 14**).

**Figure 14. Federally Reimbursed Breakfasts by Category, FY2010-FY2024**

Number of Breakfasts Reimbursed at Free/Reduced-Price versus Paid Rates



**Source:** CRS, using data from USDA, FNS, “Child Nutrition Dashboard,” accessed January 6, 2025, <https://www.fns.usda.gov/data-research/data-visualization/child-nutrition-dashboard>. FY2024 estimates (preliminary) are from USDA, FNS, “October 2024 Keydata Report,” January 10, 2025.

**Notes:** FY2024 data are preliminary. A portion of breakfasts served under CEP are counted in the *paid* category, even though all students eat for free. COVID-19-pandemic response policies affected FY2020-FY2023, as discussed throughout this report.

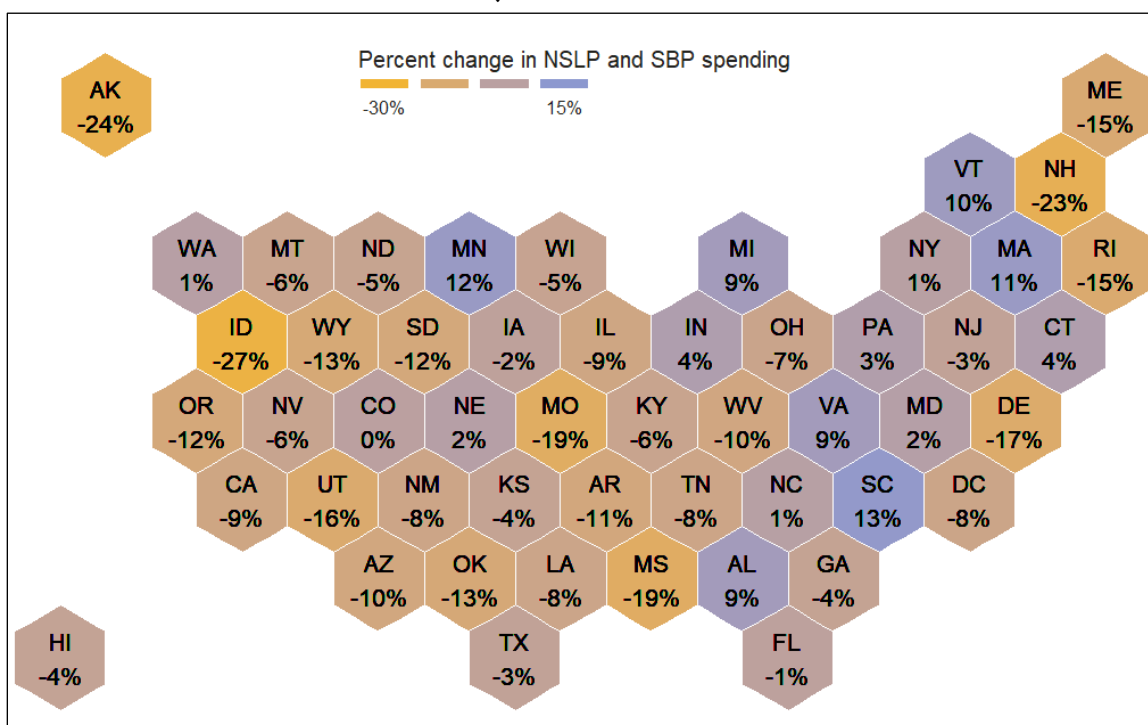
## State Trends

**Figure 15** shows changes in inflation-adjusted federal NSLP and SBP spending by state from FY2019 (the last pre-pandemic year) to FY2024 (when most pandemic aid had expired). (For inflation-adjusted and unadjusted amounts, see **Table B-3**.)<sup>77</sup> The adjusted national increase in federal spending over the period was 4.8%. Thirty states experienced an increase in adjusted NSLP and SBP spending, 2 states and the District of Columbia saw no change, and 18 states saw a decrease in adjusted spending. States that experienced the largest increases in spending included four states (Massachusetts, Michigan, Minnesota, and Vermont) operating state-funded universal school meals programs (as discussed previously, states operating universal programs do not receive additional federal funding for such purpose; however, any related participation changes may affect federal spending).

<sup>77</sup> Data for FY2024 are preliminary and subject to change as states revise prior estimates.

**Figure 15. Change in Federal NSLP and SBP Spending by State, FY2024 versus FY2019**

Adjusted for Inflation



**Source:** CRS calculations based on USDA, FNS, “Child Nutrition Tables: State Level Tables” (NSLP cash payments, NSLP commodity costs, and SBP cash payments), accessed August 9, 2024 (for FY2019) and January 6, 2025 (for FY2024), <https://www.fns.usda.gov/pd/child-nutrition-tables>, adjusted for inflation by CRS using the CPI-U, food away from home in U.S. city average, all urban consumers, not seasonally adjusted, from the U.S. Bureau of Labor Statistics.

**Notes:** Data for FY2024 are preliminary and subject to change as states revise prior estimates. NSLP spending includes cash reimbursements and commodity foods; SBP does not receive commodity aid. Other program costs such as state administrative costs are funded under other streams and are not included. **Table B-3** includes additional statistics, including amounts for territories that had available data.

## Future Spending Projections

Both USDA and the Congressional Budget Office (CBO) project a continued increase in school meals program spending over the next several years.<sup>78</sup> Some of this is due to rising inflation and the corresponding impact on school meals reimbursement rates; another contributor is a predicted increase in school meals participation, particularly in the free and reduced-price categories.<sup>79</sup> However, a decline in the school-age child population may negate some of these impacts.<sup>80</sup>

<sup>78</sup> USDA, FNS, “2025 USDA Explanatory Notes – Food and Nutrition Service,” p. 34-13, <https://www.usda.gov/sites/default/files/documents/34-FNS-2025-ExNotes.pdf>; and CBO, “Details About Baseline Projections for Selected Programs: Child Nutrition Programs: January 2025,” January 2025, <https://www.cbo.gov/system/files/2025-01/51293-2025-01-childnutrition.pdf>.

<sup>79</sup> CRS calculations based on USDA, FNS, “2025 USDA Explanatory Notes – Food and Nutrition Service,” p. 34-13, <https://www.usda.gov/sites/default/files/documents/34-FNS-2025-ExNotes.pdf>.

<sup>80</sup> ED, NCES, CCD, “Table 203.20. Enrollment in public elementary and secondary schools, by region, state, and jurisdiction: Selected years, fall 1990 through fall 2031,” *Digest of Education Statistics*, prepared December 2023, [https://nces.ed.gov/ipeds/data/digest/d23/tables/dt23\\_203.20.asp](https://nces.ed.gov/ipeds/data/digest/d23/tables/dt23_203.20.asp).

As discussed earlier in this report (see the section, “Trends in Student Participation in NSLP and SBP”), other factors that have been shown to affect school meals participation—and therefore may affect federal spending—include economic and demographic changes, changes in meal prices, improvements in student certification for meals, universal meals/CEP adoption,<sup>81</sup> and alternative breakfast models.

## Characteristics of Participants and Nonparticipants

While USDA’s administrative data capture student certifications for meals and actual meal receipts, they do not say much about the characteristics of students who participate or do not participate in school meals, their households, or their economic circumstances. Survey data can shed light on these different qualities of participants and nonparticipants. However, survey estimates tend to understate benefit receipt and are subject to margins of error.<sup>82</sup>

Previous analyses have examined characteristics of school lunch and breakfast participants using survey data. One such analysis was FNS’s School Nutrition and Meal Cost Study (published in 2019 using data from SY2014-2015). The study reported detailed information on the characteristics of school meal participants and factors associated with participation.<sup>83</sup> For example, it found

NSLP participation rates were significantly higher in elementary schools ... and among boys, Hispanic and non-Hispanic black students, students from lower income households, and students who were certified to receive free or reduced-price meals. Similar differences in SBP participation were observed, but were more pronounced.<sup>84</sup>

CRS used the Census Bureau’s 2023 SIPP data to examine characteristics of school lunch and breakfast recipients in SY2022-2023 (including free, reduced-price, and paid participants).<sup>85</sup> The SIPP asks about school meal receipt; specifically, whether children “usually” got school lunch or breakfast during the current academic year. It does not specify program participation in NSLP and SBP; therefore, it may include some students who receive school meals in non-NSLP and non-SBP settings (discussed in the “What proportion of schools currently participate in NSLP and SBP?” section of this CRS report). Because of the phrasing of the question, the SIPP may

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<sup>81</sup> As noted in the previous section, it is possible that increased adoption of CEP and state universal free meals policies could contribute to increased costs. While no additional federal funding is provided for states adopting universal free school meals, such policies could result in more students deciding to eat school meals and, as a result, more federal reimbursements provided. While CEP’s reimbursement formula is intended to mimic the federal funding that would have otherwise been provided under normal operation of the program, that is not always the case (it may provide more or less funding than under normal program operations depending on the school’s ISP). Schools with higher ISPs are more likely to adopt CEP, according to research. For example, see Pratyosh Kashyap and Becca B. R. Jablonski, “Universal free school meals: Examining factors influencing adoption of the Community Eligibility Provision,” *Applied Economic Perspectives and Policy*, 2024.

<sup>82</sup> See, for example, Bruce D. Meyer, Wallace K.C. Mok, and James X. Sullivan, “Household Surveys in Crisis,” *Journal of Economic Perspectives*, vol. 29, no. 4 (Fall 2015), pp. 199-226.

<sup>83</sup> USDA, FNS, Office of Policy Support, “School Nutrition and Meal Cost Study,” April 2019, <https://www.fns.usda.gov/research/school-meals/nutrition-meal-cost-study>.

<sup>84</sup> USDA, FNS, Office of Policy Support, “School Nutrition and Meal Cost Study: Volume 4—Student Participation, Satisfaction, and Dietary Intakes (Summary),” April 2019, <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Volume4-Summary.pdf>. Also see Volume 4, pp. 9-31 and 49-65, <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Volume4.pdf>.

<sup>85</sup> Interviews occurred from February through May 2023, asking about “the current academic year” in regards to school meals. U.S. Department of Commerce, U.S. Census Bureau, “2023 Survey of Income and Program Participation Users’ Guide,” July 2024, <https://www.census.gov/programs-surveys/sipp/tech-documentation/complete-technical-documentation/complete-documents-2023.html>.

overstate school meal participation. This may be partially remedied by the aforementioned fact that program participants tend to understate their receipt of benefits on surveys.

SIPP data for SY2022-2023 show a higher lunch and breakfast (free, reduced-price, and paid) participation rate (63% and 43%, respectively)<sup>86</sup> compared to administrative data (57% and 29%, respectively, as shown in **Figure 4**). Similar to prior analyses, CRS found that lunch participation was higher among students in lower grades (with the exception of pre-K), students from lower-income households, students who identified as Black or Hispanic or Latino, and students in households receiving SNAP benefits. There were no significant differences between lunch participation among female and male students and children reported as noncitizens versus citizens.<sup>87</sup> These estimates are presented in **Figure 16**.

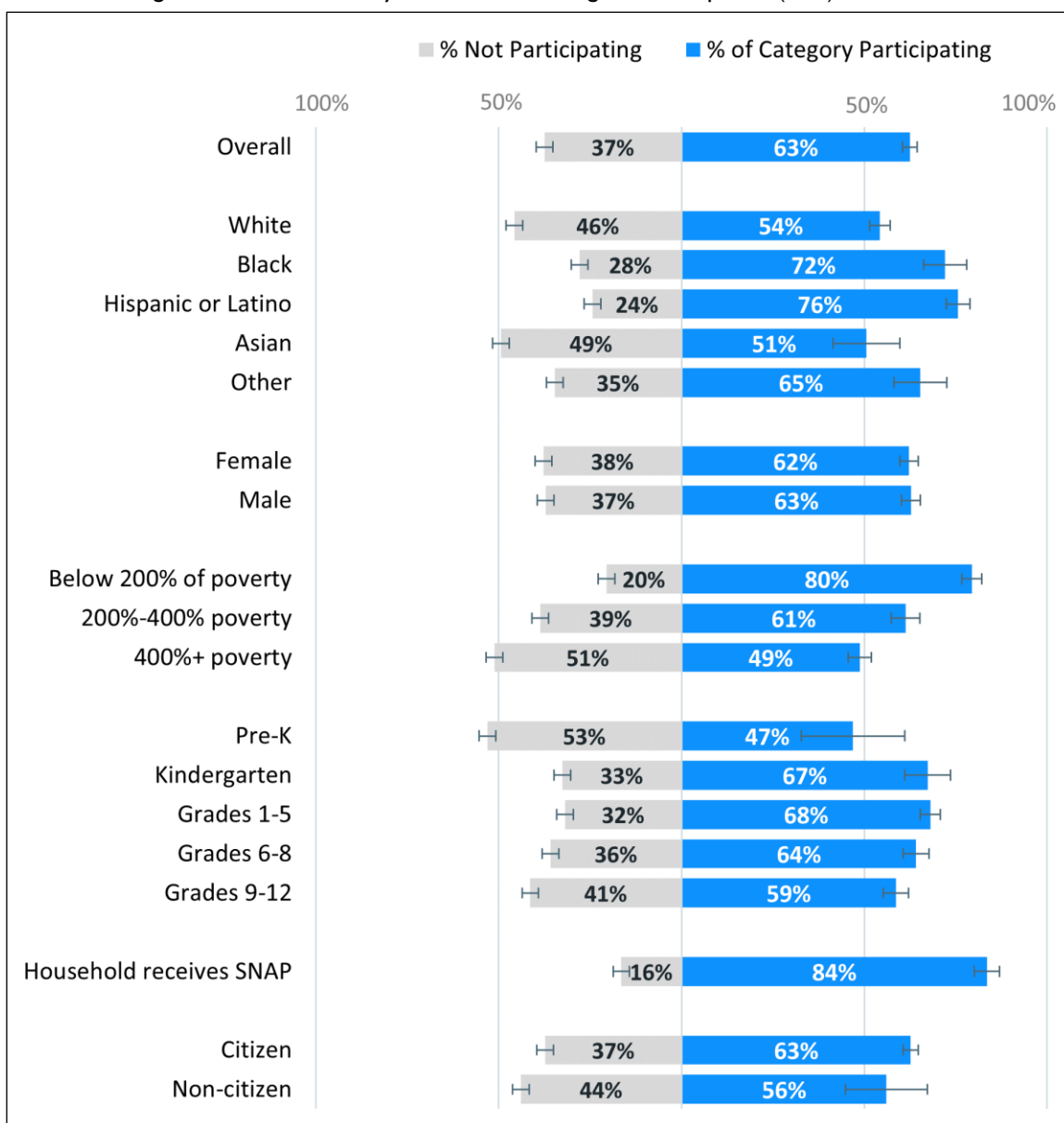
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<sup>86</sup> CRS estimates using 2023 Census Survey of Income and Program Participation (SIPP) data (school meal responses pertain to SY2022-2023).

<sup>87</sup> Citizenship status is not required for participation in NSLP and SBP. For more information, see CRS Report RL34500, *Unauthorized Aliens' Access to Federal Benefits: Policy and Issues*.

**Figure 16. Selected Characteristics of School Lunch Participants versus Nonparticipants**

Estimates Using Census Bureau Survey of Income and Program Participation (SIPP) Data for SY2022-2023



**Source:** CRS estimates using Census Bureau 2023 SIPP data (school meal responses pertain to SY2022-2023).

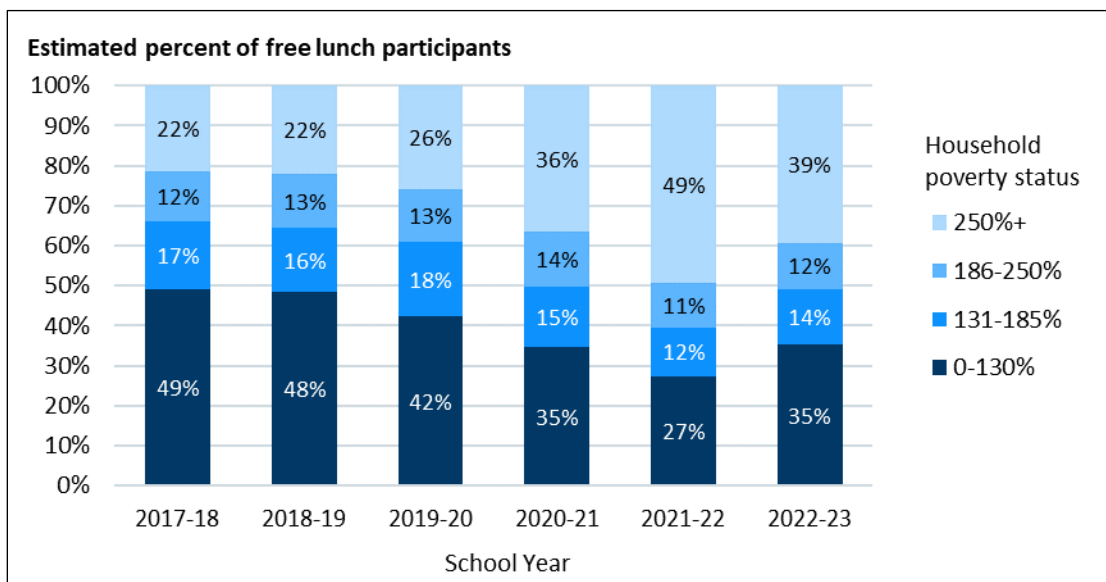
**Notes:** CRS defined the universe as any child with a response to the school meals questions on their record. Participants are defined as those who “usually got the school lunch” (whether free, reduced-price, or paid). Lunch and breakfast participation are not specific to NSLP and SBP. Error bars in the figure depict the margins of error at a 95% confidence level.

Looking specifically at free meals, consistent with the trends discussed earlier in this report, SIPP data indicate that the income distribution of the student population receiving free meals has shifted upward in recent years. As shown in **Figure 17**, an estimated 39% of students receiving free lunches were in households with incomes at or above 250% of the federal poverty level in SY2022-2023, up from 22% in SY2017-2018. Meanwhile, students in households with incomes

below 130% of the federal poverty level (the original eligibility criterion for free meals<sup>88</sup>) comprised an estimated 35% of free lunch recipients in SY2022-2023, down from 49% in SY2017-2018. Looking further back, in SY2010-2011, a CBO analysis found that roughly 63% of free lunch recipients were in households at or below 130% of poverty.<sup>89</sup> (While those below 130% of poverty make up a smaller *share* of free lunch recipients, they have not necessarily decreased in number.)

**Figure 17. Distribution of Students Receiving Free Lunches by Household Poverty Status, SY2017-2018 to SY2022-2023**

Estimates Using Census Bureau Survey of Income and Program Participation (SIPP) Data



**Source:** CRS estimates using 2018-2023 Census Bureau SIPP data.

**Notes:** Lunch participation is not specific to NSLP. In SY2020-2021 and SY2021-2022, the vast majority of students were eligible for free meals under COVID-19-pandemic response policies. “Household poverty status” refers to household income as a percentage of the Official Poverty Measure thresholds (determined by the Census Bureau) in a given year. Household income data are subject to misreporting (typically, underreporting of benefit use) and may overstate poverty. Margins of error are available to congressional clients upon request to the author.

Comparing breakfast with lunch participation, SIPP data show that students who participate in school breakfast are more likely to come from lower-income households, and a higher proportion of breakfasts are served for free or at a reduced-price compared to school lunches (**Figure 18**). This is consistent with previous research.<sup>90</sup>

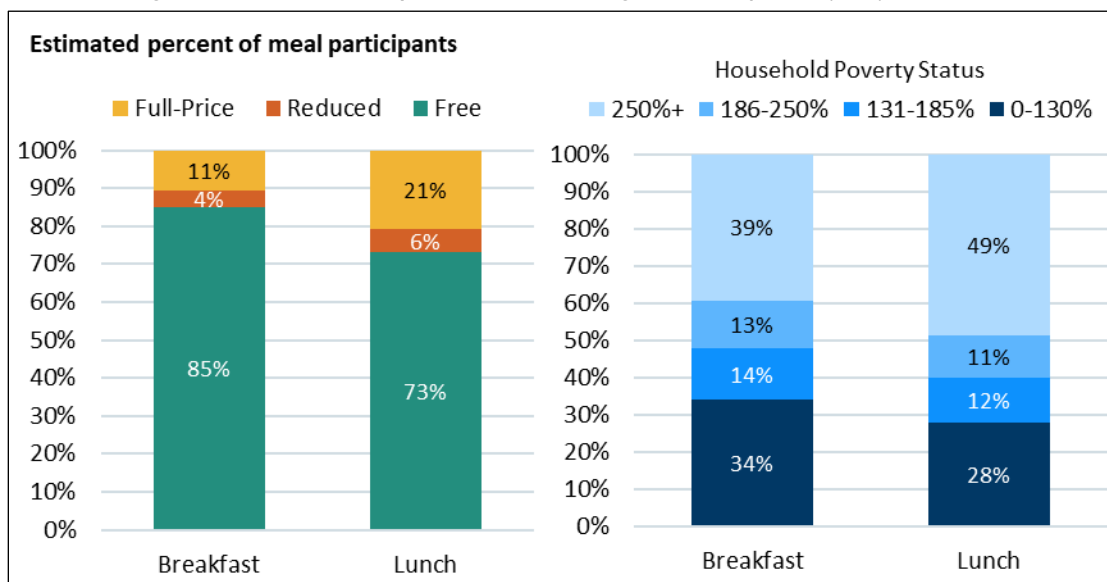
<sup>88</sup> According to household application criteria established in the Richard B. Russell National School Lunch Act, students in households with incomes at or below 130% of the federal poverty guidelines (published by the U.S. Department of Health and Human Services, which differ from the Census Bureau’s poverty levels) qualify for free meals and those with household incomes between 130% and 185% of the guidelines qualify for reduced-price meals. However, some students above 185% of poverty receive free meals due to policies such as direct certification with SNAP and other programs/avenues, CEP, and state-level policies (as discussed previously in this report).

<sup>89</sup> CBO, “Child Nutrition Programs: Spending and Policy Options,” September 2015, p. 35, <https://www.cbo.gov/publication/50737>.

<sup>90</sup> For example, see USDA, FNS, Office of Policy Support, “School Nutrition and Meal Cost Study: Volume 4—Student Participation, Satisfaction, Plate Waste, and Dietary Intakes,” final report, April 2019, p. 13, <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Volume4.pdf>.

**Figure 18. School Breakfast versus Lunch Participation:  
Student Poverty Levels and Meal Type**

Estimates Using Census Bureau Survey of Income and Program Participation (SIPP) Data for SY2022-2023



**Source:** CRS estimates using Census Bureau 2023 SIPP data (school meal responses pertain to SY2022-2023).

**Notes:** Lunch and breakfast participation are not specific to NSLP and SBP. “Household poverty status” refers to household income as a percentage of the Official Poverty Measure thresholds (determined by the Census Bureau) in a given year. Household income data are subject to misreporting (typically, underreporting of benefit use) and may overstate poverty. Margins of error available to congressional clients upon request to the author.

## Discussion

School meal participation is tied to a variety of factors, including federal, state, and local policies, economic and demographic trends, and household decisions. There has been a shift toward the provision of free school meals over the past couple of decades, particularly as more schools provide universal free meals service under state or federal program options. As discussed in this report, universal meals policies do not necessarily increase federal spending on school meals. From 2010 to 2024, federal spending on NSLP and SBP increased, but not when adjusting for inflation. These and other trends discussed in this report may be of interest to policymakers as they consider changes to school meals programs as well as intertwined programs, including Title I-A (discussed below). This report also raises other questions for consideration, such as why private schools participate in the school meals programs at lower rates, why school and student participation rates vary by state, and why lunch prices are declining.

Long-standing debates exist in many social programs over targeted versus universal benefits.<sup>91</sup> In the context of school meals, proponents argue that universal policies reduce administrative burdens (for families and schools), including in regard to the collection of unpaid meal debts, and lead to less stigma for children, which they claim can increase meal participation, reduce food

<sup>91</sup> See, for example, R.M. Desai, “Rethinking the universalism versus targeting debate,” The Brookings Institution, May 31, 2017, <https://www.brookings.edu/blog/future-development/2017/05/31/rethinking-the-universalism-versus-targeting-debate>; and the “Universal Policies Versus Need-Tested Benefits” section in CRS Report R43731, *Poverty: Major Themes in Past Debates and Current Proposals*.

insecurity, and improve academic outcomes.<sup>92</sup> Arguments for retaining or narrowing eligibility focus on targeting benefits to the children most in-need—which has generally been the structure since the start of the programs—and avoiding increases in federal spending.<sup>93</sup> The role of the federal government versus states, localities, and households sometimes arises in these discussions.

Other practical considerations have been raised. Under universal meals programs, schools are not required to collect household applications for free and reduced-price meals. When free and reduced-price meal applications are not collected, a source of local-level poverty data used in other federal and state programs becomes unavailable.<sup>94</sup> For example, local educational agencies receiving funds under the Title I-A program have historically used free and reduced-price meals information as a primary source of data in school-level funding allocations. The Title I-A program has been grappling with the weakening of free and reduced-price meals data as a poverty indicator over the past couple of decades, and while it has implemented alternatives to this data, it has not come up with an agreed-upon replacement.<sup>95</sup>

It is uncertain whether current financing models for universal school meals programs will be sustainable.<sup>96</sup> Universal meals policies remove a revenue stream (student meal payments) for school food service departments. State and federal meal reimbursements do not always cover the full cost of running a school meals program.<sup>97</sup> And while NSLP and SBP have been long-standing funding streams that schools have come to rely on, the longevity of state funding for universal meals remains an open question.<sup>98</sup>

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<sup>92</sup> See, for example, Janet Poppendieck, “Top 10 Reasons to Support Free Healthy School Meals for All,” FRAC, April 8, 2021, <https://frac.org/blog/top-10-reasons-to-support-free-healthy-school-meals-for-all>; and Meg Wilcox, “The People Behind School Meals Are Pushing for Free Access for All,” Civil Eats, March 8, 2021, <https://civileats.com/2021/03/08/the-people-behind-school-meals-are-pushing-for-free-access-for-all>.

<sup>93</sup> For example, see Daren Bakst and Jonathan Butcher, “Congress Has to Avoid Universal Free School Meals Which Include Wealthy,” The Heritage Foundation, October 23, 2020, <https://www.heritage.org/welfare/commentary/congress-has-avoid-universal-free-school-meals-which-include-wealthy>. For a discussion of policy options and considerations associated with restricting or expanding eligibility for school meals, see CRS Report R46888, *Amending Eligibility Rules for Free and Reduced-Price School Meals: Background and Policy Options*.

<sup>94</sup> Examples of federal programs that use F/RP data information include other child nutrition programs (including Summer EBT), the Child Care and Development Block Grant (CCDBG), the Children’s Health Insurance Program, Medicaid, and Workforce Innovation and Opportunity Act youth programs. Several states also use F/RP data to allocate state education funds (Urban Institute, “Measuring Student Poverty: Dishing Up Alternatives to Free and Reduced-Price Lunch,” September 20, 2019, <https://www.urban.org/features/measuring-student-poverty-dishing-alternatives-free-and-reduced-price-lunch>).

<sup>95</sup> For further discussion, see CRS Report R46600, *ESEA: Title I-A Poverty Measures and Grants to Local Education Agencies and Schools*.

<sup>96</sup> One case study that explored this issue from the school district perspective is Alicia Landry and Jessica Thomson, “Procurement of Foods in Mississippi Delta Schools,” *Journal of Child Nutrition and Management*, published by the School Nutrition Association, vol. 46, no. 1, Spring 2022, <https://schoolnutrition.org/journal/spring-2022-perceptions-of-implementation-of-universal-free-meals-in-the-national-school-lunch>.

<sup>97</sup> USDA, FNS, Office of Policy Support, “School Nutrition and Meal Cost Study: Volume 3—School Meal Costs and Revenues,” final report, April 2019, <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Volume3.pdf>.

<sup>98</sup> For example, Colorado has experienced a funding shortfall for its universal free school meals program. See Yesenia Robles, “With more Colorado students eating free meals at school, state may cut back the program,” *Chalkbeat Colorado*, March 5, 2024, <https://www.chalkbeat.org/colorado/2024/03/06/colorado-free-school-meals-budget-deficit-changes>.

## Appendix A. Data Sources and Limitations

### USDA, FNS Administrative Data

#### Meal Counts and Spending Data

School food authorities must keep track of meals served by category on a daily basis.<sup>99</sup> They report these meal counts to state agencies on a monthly basis, who provide them with reimbursement for meals served and send a monthly report of meal counts to FNS via the FNS-10 form.<sup>100</sup> FNS then uses the meal counts to create estimates of average daily participants by using a multiplier (1.079) to account for absent students (who may be certified for meals but not receiving them due to absence).<sup>101</sup> Therefore, USDA's participant data are estimates and should be viewed as imprecise.

CRS calculated student participation rates by dividing average daily NSLP participants by total enrolled students, as reported by school food authorities on the same FNS-10 form. One limitation of this approach is that enrolled students are based on either an October average or typical operating day in October, while average daily participants are calculated over the entire fiscal year (excluding summer months).

Similar to meal count reporting, school food authorities report revenues and expenses monthly to state agencies, who report expenditure data to FNS quarterly via the FNS-777 form.<sup>102</sup>

Because states and school food authorities are allowed to revise meal counts, enrollment, and spending data, data should not be viewed as final until (typically) one fiscal year after initial reporting. Data that are based on preliminary estimates are noted in this CRS report.

#### Student Approvals for Meals Data

Each fall, school food authorities track information on students certified for free and reduced-price meals and those whose certification status has been verified for accuracy. The FNS-742 is a standard form that must be completed by school food authorities and submitted to the state agency by December of each year. The state agency then compiles the forms and provides the resulting statewide dataset to USDA by April. USDA uses the dataset primarily to monitor states' verification activities—an annual process through which school districts verify the accuracy of a sample of approved household applications. However, the FNS-742 form also includes descriptive data on the number of schools participating in CEP and the other special provisions.

There are two notable limitations to this dataset: (1) it does not separate out states with universal free meals policies, which CRS calculated manually; and (2) the decision to opt into CEP is made at the local educational agency level, whereas FNS-742 data are reported at the school food authority level. These entities usually, but not always, match up—contributing to small

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<sup>99</sup> 7 C.F.R. §210.7.

<sup>100</sup> 7 C.F.R. §210.8(b) and 7 C.F.R. §210.5. The FNS-10 form is available at <https://fns-prod.azureedge.us/sites/default/files/resource-files/form-fns-10.pdf>.

<sup>101</sup> Multiplier acquired through communication with FNS in September 2021.

<sup>102</sup> 7 C.F.R. §210.5. The FNS-777 form is available at <https://fns-prod.azureedge.us/sites/default/files/resource-files/FNS-777.pdf>.

discrepancies between USDA's CEP data and other CEP data collected by the FRAC, which are collected at the local educational agency level.<sup>103</sup>

## Census Bureau SIPP

SIPP is a nationally representative, household-based survey conducted by the Census Bureau that examines households' economic well-being and participation in government programs over time. SIPP provides users with the ability to track the same households over time (longitudinal data) as well as intermittent snapshots of a sample of households (cross-sectional data). This CRS report uses cross-sectional, annual SIPP data, which provide a larger sample size and a mixture of households in each year.

SIPP includes the following questions on school lunch receipt (parallel questions are asked for school breakfast):

Since the beginning of the current academic school year, did [child] in the household usually get the lunch that [their] school provides?

Were any of these lunches free or reduced-price?

The school meals questions are asked "of designated parents of children between the ages of 5 and 18 who have not yet graduated from high school." CRS defined the universe for this analysis as any child who had a response to the school meals questions on their records, excluding children who were homeschooled (as such children are not eligible for school meals through the federal programs).

There are some limitations to SIPP's school meals estimates. As noted previously in this report, the school meals questions are asked of all households, regardless of whether children attend an NSLP or SBP school. Therefore, SIPP estimates of school meals participation rates tend to be higher than USDA's NSLP and SBP participation rates. In addition, the school meals questions changed in 2022 to ask about the current *academic* year (for the 2023 SIPP, SY2022-2023), whereas in 2021 and earlier they asked about the last *calendar* year (e.g., the 2021 SIPP would pertain to 2020, and could potentially refer to SY2019-2020 or SY2020-2021). As a result, the Census Bureau urges caution when comparing post-2021 SIPP school meals data with earlier years. This limitation only affects **Figure 17** (trends in lunch participation by household poverty level).

SIPP has also struggled with response rates in recent years.<sup>104</sup> CRS calculated the margins of error at a 95% confidence level for the estimates presented in this report, and significance tests where applicable (noted in the "Characteristics of Participants and Nonparticipants" section).<sup>105</sup> (However, this does not alleviate any nonresponse bias (when nonrespondents differ from respondents in meaningful ways). The Census Bureau attempts to mitigate, but cannot fully eliminate, nonresponse bias.<sup>106</sup>

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<sup>103</sup> For example, FRAC found 40,235 CEP schools in SY2022-2023, compared to USDA's 39,971 reported CEP schools for the same school year. FRAC, "Community Eligibility," <https://frac.org/community-eligibility>. FRAC's CEP data are also collected slightly later in the school year than FNS-742 data, which could also contribute to discrepancies.

<sup>104</sup> U.S. Census Bureau, "2023 SIPP: Insufficient Geographic Coverage and Unit Nonresponse," July 10, 2024, <https://www.census.gov/programs-surveys/sipp/tech-documentation/user-notes/2023-usernotes/2023-insuff-geog-cov-unit-nonresp.html>.

<sup>105</sup> Estimates on-hand with author and available upon request. In general, estimates were presented only when they exceeded the recommended minimum sample size (30 unweighted observations) by Census for SIPP.

<sup>106</sup> For a discussion of SIPP's quality, see Appendix A of CRS Report R46942, *Demographic and Socioeconomic Characteristics of Nonresident Parents*.

## ED's NCES Data

The CCD is an annual survey conducted by ED's NCES of all state educational agencies in the United States, which report information on local public schools and school districts. The survey has a 100% response rate among state educational agencies, and a nearly 100% coverage rate of regular public schools in the nation (the coverage rate was 96% when nontraditional agencies such as those that provide special or vocational education were included). While the CCD is not a sample-based survey and therefore not subject to sampling error, it may include nonsampling error, such as differing interpretations of questions. ED tries to minimize this type of error by providing reporting guidance to states.

The information from the CCD used in this report was states' reports of schools' NSLP participation status as of November 30 or the closest school day to November 30 of the school year in question. States had six options for response, providing detail on the type of NSLP operation:

- Yes, participating without using any Provision or the CEO
- Yes, under Provision 1
- Yes, under Provision 2
- Yes, under Provision 3
- Yes, under Community Eligibility Option (CEO)
- No

This report uses the CCD's NSLP status data to estimate the percentage of public schools operating NSLP nationwide (collapsing the "yes" responses into one category). Both the numerator (schools reporting participation in NSLP) and denominator (total schools in the survey) come from the CCD, making this a firmer estimate than other school-based estimates presented in this report, which combine USDA administrative data with NCES data. Specifically, the percentage of public schools participating in SBP applies USDA administrative data on the number of SBP schools to total schools in the United States from the CCD. Likewise, the percentage of private schools participating in SBP and NSLP is the number of private schools participating in the programs as reported by USDA compared to the total number of private schools in the nation reported on the NCES Private School Universe Survey (PSS). These are imprecise estimates, as the definition of "school" differs between USDA and ED data collections. Whereas USDA generally considers an NSLP school to be one building (regardless of how many grade levels are contained within it), "it is possible for more than one CCD-defined school to exist at a single location (e.g., an elementary and secondary school sharing a building, each with its own principal)." To assess the severity of the issue, CRS compared estimates of public schools' participation in NSLP in the CCD compared to USDA administrative data as applied to CCD totals. The different approaches resulted in a 1.6 percentage point difference in NSLP participation rates at the national level. However, there were greater discrepancies at the state level. Therefore, state-level data are only shown for like-to-like comparisons (NSLP program status in the CCD compared to total public schools in the CCD) rather than, say, SBP program status in USDA administrative data compared to total schools in the CCD.

## Appendix B. State-Level Data

**Table B-1. Public School Participation in NSLP by State or Jurisdiction, SY2022-2023**

As Reported on the NCES CCD (Covering All Operational Public Schools Nationwide)

State or Jurisdiction	Total NSLP Schools	Total Public Schools	Estimated % of Schools Participating in NSLP
Alabama	1,516	1,516	100.0%
Alaska	394	498	79.1%
Arizona	1,681	2,429	69.2%
Arkansas	1,054	1,098	96.0%
California	9,964	10,327	96.5%
Colorado	1,753	1,932	90.7%
Connecticut	941	1,013	92.9%
Delaware	228	229	99.6%
District of Columbia	231	244	94.7%
Florida	3,672	4,230	86.8%
Georgia	2,306	2,316	99.6%
Hawaii	278	295	94.2%
Idaho	670	795	84.3%
Illinois	3,683	4,408	83.6%
Indiana	1,800	1,921	93.7%
Iowa	1,327	1,327	100.0%
Kansas	1,290	1,355	95.2%
Kentucky	1,533	1,542	99.4%
Louisiana	1,337	1,337	100.0%
Maine <sup>a</sup>	556	597	93.1%
Maryland	1,410	1,410	100.0%
Massachusetts	1,823	1,837	99.2%
Michigan	3,510	3,510	100.0%
Minnesota	1,875	2,690	69.7%
Mississippi	—	1,038	—
Missouri	2,318	2,473	93.7%
Montana	737	826	89.2%
Nebraska	934	1,092	85.5%
Nevada	726	748	97.1%
New Hampshire	463	502	92.2%
New Jersey	—	2,562	—

State or Jurisdiction	Total NSLP Schools	Total Public Schools	Estimated % of Schools Participating in NSLP
New Mexico	827	890	92.9%
New York	4,548	4,812	94.5%
North Carolina	2,592	2,716	95.4%
North Dakota	464	511	90.8%
Northern Marianas	35	35	100.0%
Ohio	3,009	3,632	82.8%
Oklahoma	1,776	1,781	99.7%
Oregon	1,159	1,286	90.1%
Pennsylvania	2,824	2,936	96.2%
Puerto Rico	858	858	100.0%
Rhode Island	316	316	100.0%
South Carolina	1,226	1,264	97.0%
South Dakota	599	720	83.2%
Tennessee	1,773	1,900	93.3%
Texas	8,822	9,180	96.1%
U.S. Virgin Islands	21	21	100.0%
Utah	944	1,102	85.7%
Vermont	293	305	96.1%
Virginia	1,864	2,132	87.4%
Washington	2,086	2,549	81.8%
West Virginia	584	684	85.4%
Wisconsin	2,025	2,235	90.6%
Wyoming	357	361	98.9%
<b>Total</b>	<b>91,622</b>	<b>100,323</b>	<b>91.3%</b>

**Source:** CRS calculations based on ED, NCES, CCD for SY2022-2023 (Version 1a).

- a. States had relatively high response rates (above 95%) to the NSLP question except for Maine, which was missing responses from 6.8% of schools. Rates are not shown for Mississippi and New Jersey due to reporting irregularities. There may be an unknown amount of error due to state misreporting.

**Table B-2. Student Participation in NSLP by State, FY2023**

Estimates using USDA Administrative Data

State/Territory	NSLP Participants (average daily)	Students Enrolled in NSLP Schools	Estimated % of Students Participating in NSLP
Alabama	486,547	743,598	65.4%
Alaska	43,327	101,859	42.5%
Arizona	548,969	1,052,935	52.1%
Arkansas	306,479	471,032	65.1%
California	3,216,241	6,013,343	53.5%
Colorado	353,806	815,949	43.4%
Connecticut	311,391	488,126	63.8%
Delaware	91,951	150,613	61.1%
District of Columbia	48,410	96,933	49.9%
Florida	1,702,968	2,901,455	58.7%
Georgia	1,089,366	1,786,155	61.0%
Guam	14,774	30,979	47.7%
Hawaii	90,293	166,104	54.4%
Idaho	133,644	314,503	42.5%
Illinois	914,821	1,660,434	55.1%
Indiana	710,142	1,143,673	62.1%
Iowa	362,655	571,023	63.5%
Kansas	313,791	574,539	54.6%
Kentucky	486,970	699,975	69.6%
Louisiana	495,456	724,705	68.4%
Maine	113,430	175,717	64.6%
Maryland	418,490	925,681	45.2%
Massachusetts	596,441	933,570	63.9%
Michigan	793,245	1,419,802	55.9%
Minnesota	585,117	897,866	65.2%
Mississippi	312,061	460,275	67.8%
Missouri	526,300	923,772	57.0%
Montana	74,942	170,568	43.9%
Nebraska	240,606	358,727	67.1%
Nevada	232,438	415,114	56.0%
New Hampshire	74,988	163,337	45.9%
New Jersey	687,588	1,282,387	53.6%
New Mexico	186,385	306,517	60.8%

State/Territory	NSLP Participants (average daily)	Students Enrolled in NSLP Schools	Estimated % of Students Participating in NSLP
New York	1,593,159	2,762,573	57.7%
North Carolina	762,233	1,515,461	50.3%
North Dakota	92,962	137,779	67.5%
Ohio	933,111	1,750,458	53.3%
Oklahoma	390,126	668,611	58.3%
Oregon	267,176	574,226	46.5%
Pennsylvania	959,229	1,678,418	57.2%
Puerto Rico	162,969	299,672	54.4%
Rhode Island	70,322	140,892	49.9%
South Carolina	458,304	788,883	58.1%
South Dakota	100,242	151,340	66.2%
Tennessee	612,970	1,005,041	61.0%
Texas	3,345,542	5,398,925	62.0%
Utah	310,136	653,519	47.5%
Vermont	53,562	95,148	56.3%
Virginia	703,924	1,266,612	55.6%
Virgin Islands	5,111	12,721	40.2%
Washington	493,032	1,065,548	46.3%
West Virginia	166,923	256,926	65.0%
Wisconsin	474,075	851,600	55.7%
Wyoming	44,149	91,968	48.0%
<b>Total</b>	<b>28,563,836</b>	<b>50,107,587</b>	<b>57.0%</b>

**Source:** CRS, applying FY2023 participation data from USDA, FNS, “Child Nutrition Tables: State Level Tables: FY 2019-2023: National School Lunch: Participation,” <https://www.fns.usda.gov/pd/child-nutrition-tables> to FY2023 enrollment in NSLP schools by state, acquired through communication with USDA, FNS in April 2024.

**Notes:** Includes free, reduced-price, and paid lunch participants. School food authorities and state agencies estimate the number of NSLP participants based on the number of lunches served; therefore, estimates may be imprecise. Participant estimates are based on the nine-month school year, while student enrollment estimates are based on October data.

**Table B-3. Federal NSLP and SBP Spending by State, FY2019 versus FY2024**

Dollars in Millions

State	FY2019 (actual)	FY2019 (in FY2024 dollars)	FY2024	% Change, FY2019- FY2024 (actual)	% Change, FY2019- FY2024 (inflation adjusted)
Alabama	332.8	431.0	467.9	41%	9%
Alaska	52.0	67.4	51.1	-2%	-24%
Arizona	410.1	531.1	475.4	16%	-10%
Arkansas	213.5	276.5	245.6	15%	-11%
California	2,269.0	2,938.4	2,666.7	18%	-9%
Colorado	191.6	248.2	247.4	29%	0%
Connecticut	166.8	216.1	224.5	35%	4%
Delaware	56.9	73.7	61.4	8%	-17%
District of Columbia	40.8	52.9	48.7	19%	-8%
Florida	1,236.0	1,600.6	1,581.2	28%	-1%
Georgia	771.9	999.7	956.8	24%	-4%
Guam	13.4	17.4	15.0	12%	-14%
Hawaii	59.2	76.7	73.8	25%	-4%
Idaho	75.3	97.5	71.6	-5%	-27%
Illinois	654.9	848.1	770.0	18%	-9%
Indiana	394.8	511.3	534.1	35%	4%
Iowa	160.3	207.6	203.9	27%	-2%
Kansas	152.9	198.1	189.7	24%	-4%
Kentucky	368.9	477.8	449.0	22%	-6%
Louisiana	372.7	482.6	446.2	20%	-8%
Maine	51.6	66.9	57.1	11%	-15%
Maryland	271.2	351.2	358.3	32%	2%
Massachusetts	296.9	384.5	427.9	44%	11%
Michigan	482.8	625.2	679.1	41%	9%
Minnesota	238.3	308.6	344.2	44%	12%
Mississippi	257.2	333.1	270.4	5%	-19%
Missouri	321.5	416.3	336.2	5%	-19%
Montana	43.5	56.4	53.0	22%	-6%
Nebraska	108.7	140.8	143.3	32%	2%
Nevada	160.3	207.6	196.1	22%	-6%
New Hampshire	31.6	40.9	31.7	0%	-23%
New Jersey	403.8	522.9	506.8	26%	-3%

State	FY2019 (actual)	FY2019 (in FY2024 dollars)	FY2024	% Change, FY2019- FY2024 (actual)	% Change, FY2019- FY2024 (inflation adjusted)
New Mexico	154.6	200.2	184.0	19%	-8%
New York	1,174.0	1,520.4	1,531.8	30%	1%
North Carolina	574.2	743.6	751.3	31%	1%
North Dakota	32.8	42.5	40.2	23%	-5%
Ohio	546.7	708.0	660.2	21%	-7%
Oklahoma	250.4	324.3	282.3	13%	-13%
Oregon	164.9	213.5	187.6	14%	-12%
Pennsylvania	594.4	769.8	795.8	34%	3%
Puerto Rico	155.5	201.3	132.9	-15%	-34%
Rhode Island	45.4	58.8	49.7	9%	-15%
South Carolina	320.2	414.6	469.6	47%	13%
South Dakota	40.7	52.7	46.5	14%	-12%
Tennessee	428.9	555.5	509.7	19%	-8%
Texas	2,356.2	3,051.4	2,958.4	26%	-3%
Utah	141.8	183.7	154.9	9%	-16%
Vermont	23.9	31.0	34.1	42%	10%
Virginia	388.9	503.7	546.9	41%	9%
U.S. Virgin Islands	5.5	7.1	5.9	6%	-18%
Washington	288.8	373.9	379.0	31%	1%
West Virginia	137.7	178.3	160.5	17%	-10%
Wisconsin	253.2	328.0	311.3	23%	-5%
Wyoming	20.7	26.8	23.3	12%	-13%
<b>Total</b>	<b>18,760.8</b>	<b>24,295.9</b>	<b>23,400.0</b>	<b>25%</b>	<b>-4%</b>

**Source:** CRS calculations based on USDA, FNS, “Child Nutrition Tables: State Level Tables” (NSLP cash payments, NSLP commodity costs, and SBP cash payments) accessed August 9, 2024 (for FY2019) and January 6, 2025 (for FY2020-FY2024), <https://www.fns.usda.gov/pd/child-nutrition-tables>, adjusted for inflation by CRS using the CPI-U, food away from home in U.S. city average, all urban consumers, not seasonally adjusted, from the U.S. Bureau of Labor Statistics.

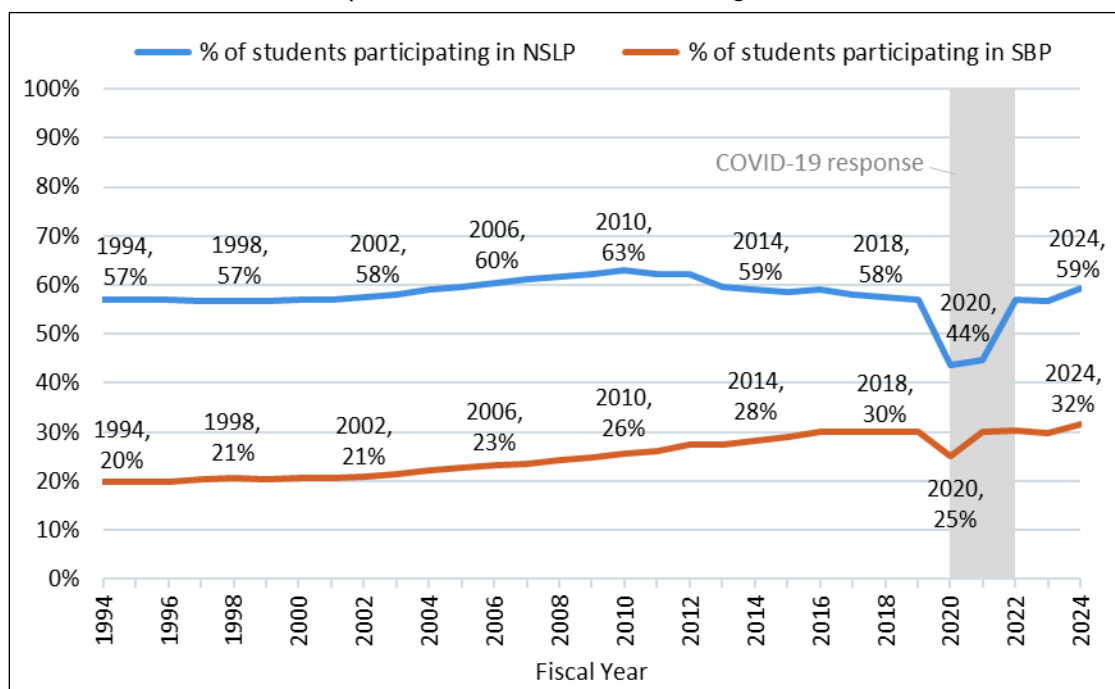
**Notes:** Data for FY2024 are preliminary and subject to change as states revise prior estimates. NSLP spending includes cash reimbursements and commodity foods; SBP does not receive commodity support. Other program costs such as state administrative costs are funded under other streams and are not included.

## Appendix C. Long-Term Trends

**Figure C-1** shows NSLP and SBP student participation rates from FY1994 to FY2024 (preliminary estimates). The *participation rate* is the number of estimated meal recipients divided by the number of total students in NSLP and SBP schools in USDA administrative data. SBP participation has been rising over the past three decades (with the exception of the pandemic years), whereas NSLP participation experienced a peak of 63% in FY2010.

**Figure C-1. Trends in NSLP and SBP Student Participation, FY1994-FY2024**

Estimated Meal Recipients Out of All Students Attending NSLP and SBP Schools



**Source:** CRS, applying estimated meal recipients from USDA, FNS, “Child Nutrition Tables: National Level Annual Summary Tables: FY 1969-2023,” as of June 14, 2024, <https://www.fns.usda.gov/pd/child-nutrition-tables> (nine-month school year averages) to total enrollment in NSLP and SBP schools acquired from USDA, FNS in June 2024.

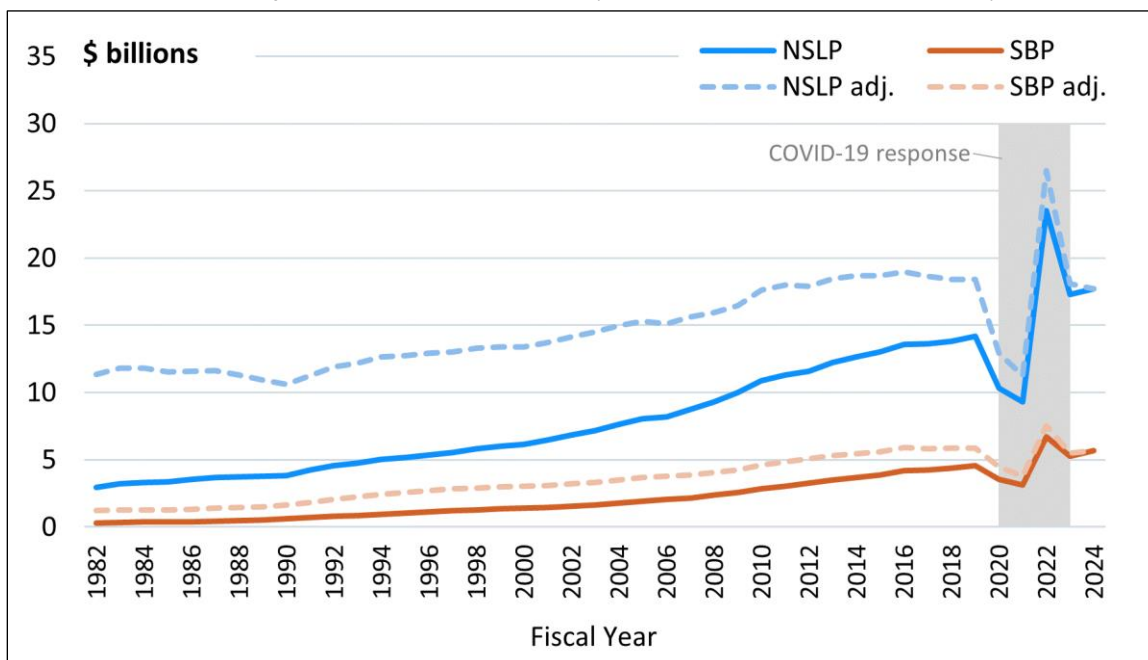
**Notes:** “Fiscal year” refers to the accounting period of the federal government that begins on October 1 and ends on September 30 of the next calendar year (e.g., FY2024 refers to October 1, 2023, through September 30, 2024). FY2024 data are preliminary.

**Figure C-2** shows NSLP and SBP expenditures dating back to FY1981. The early 1980s saw the implementation of budget cuts to NSLP and SBP—part of larger efforts to reduce federal domestic spending in the Omnibus Reconciliation Act of 1980 (P.L. 96-499) and Omnibus Reconciliation Act of 1981 (Title VIII of P.L. 97-35). Starting in FY1991, real spending on NSLP started growing again—generally experiencing an upward trajectory until appearing to level off around FY2016. The COVID-19 pandemic saw an initial drop and then a spike in spending, consistent with federal response policies. Pandemic aid continued to affect spending in FY2023, and it is unclear how spending will change in future years (as discussed in the “COVID-19 Pandemic” section).

SBP has experienced comparatively steady growth in both nominal and real terms (excepting the pandemic years).

**Figure C-2. Trends in NSLP and SBP Spending, FY1982-FY2024**

Federal Expenditures on NSLP and SBP (Excludes State Administrative Funds)



**Source:** Expenditures from USDA, FNS, “Child Nutrition Tables: NSLP, SBP and SMP - Program Costs—Cash and Commodities,” December 13, 2024, <https://www.fns.usda.gov/pd/child-nutrition-tables>. Inflation-adjusted amounts are in FY2024 dollars, adjusted for inflation by CRS using the CPI-U, food away from home in U.S. city average, all urban consumers, not seasonally adjusted, from the U.S. Bureau of Labor Statistics.

**Notes:** NSLP spending includes cash reimbursements and commodity foods; SBP does not receive commodity support. Other program costs such as state administrative costs are funded under other streams and are not included. From March 2020 through SY2020-2021 (affecting FY2020 and FY2021), schools were authorized to serve meals through SFSP during the school year under COVID-19-pandemic response policies; therefore, NSLP and SBP spending do not account for all meals served to children. FY2022 reflects federal reimbursements for universal free meals under SSO in SY2021-2022, and FY2022 and FY2023 include supplemental funds from P.L. 117-158.

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