

CHILD NUTRITION PROGRAMS: MASSACHUSETTS AND BEYOND

A Hunger-Free Communities Report

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The Bill Emerson National Hunger Fellowship is a program that trains and inspires new leaders in the movement to end hunger and poverty in the United States. Fellows gain vital first-hand experience through placements with community-based organizations across the country as well as policy-focused organizations in Washington, D.C. The program bridges gaps between local efforts and national public policy, as fellows support partner organizations with program development, research, evaluation, outreach, organizing, and advocacy projects.



Project Bread is a Massachusetts-based anti-hunger organization. They connect people and communities in Massachusetts to reliable sources of food while advocating for policies that make food more accessible so that no one goes hungry. This report would not have been possible without input from many members of Project Bread, including Leran Minc, Jennifer Lemmerman, and Natasha Smith.

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1. Introduction

The United States is widely considered to be one of the wealthiest, most successful countries in the world, having both the highest GDP and the most billionaires. However, in 2019, 10.9% of individuals and 14.6% of children lived in a food-insecure household in the United States¹. This equates to over 35 million people overall, including almost 11 million children. Food insecurity leads to health, education, and economic disparities that leave millions struggling to survive and thrive. This is unacceptable, especially in a country that claims to value liberty and justice for all.

Further, home to one of the best economies in the United States, forward-thinking political leaders, and strong education and healthcare systems (each ranked second in the country), Massachusetts is one of the wealthiest and most progressive states in the country. However, many Bay Staters, disproportionately those of color, those who are differently-abled, those who are LGBTQ+, and others who face systemic inequities, have been left behind or have fallen through the cracks by policies that have failed to make alleviating poverty and food insecurity a priority. According to 2020 United States Census data, 9.5% of Massachusetts citizens live below the poverty line². Before the COVID-19 pandemic, in 2019, Feeding America estimated that 8.2% of Massachusettsans were food insecure (566,930 people)³.

The COVID-19 pandemic has exacerbated existing issues of food insecurity in the United States, and Massachusetts was not an exemption to this. In Massachusetts, the percentage of food insecure households doubled during the pandemic⁴. These numbers are even higher among households with children. Between April and May 2020, 23.1% of Massachusetts households with children were food insecure. While these numbers are slowly returning to their pre-pandemic rates, these pre-pandemic rates are still far too high, and we must work to end food insecurity in Massachusetts and the United States as a whole.

Ultimately, no one should go hungry, and this is especially true for children. The COVID-19 pandemic has also shown us the importance of child nutrition programs. While the Supplemental Nutrition Assistance Program (SNAP) has been the biggest support for food insecure households during the pandemic*, school meals provided the next biggest support for families. Through school and summer meal sites, over 93 million meals were served to students in Massachusetts between September 2020 and June 2021. Child nutrition programs in the United States were often created in response to economic and social ills, and they continue to be a lifeline for many children and their families. This said, they can still be improved, and their goals can be accelerated through various policies.

This report will explore the child nutrition programs, including their benefits, history, and financing. The first part will examine programs that take place during the school day: the National School Lunch Program, the School Breakfast Program, and the Fresh Fruit and Vegetable Program. The second part will examine programs that take place outside of school: afterschool meal programs (NSLP, CACFP) and summer meal programs (SFSP, SSO). Finally, the third part will examine early childhood programs: the Child and Adult Care Food Program (CACFP) and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

2. Methodology

This report seeks to examine federal and state policies and practices regarding child nutrition programs. To find these policies and practices, research was done at the federal level through the programs' federal websites. At the state level, key word searches in the

* While SNAP is a crucial tool in fighting childhood hunger, this report will not go into detail about the program due to time and capacity constraints.

Massachusetts Acts and Resolves database and budget database were used. Outside resources created by organizations such as the Food Research and Action Center and the School Nutrition Association were also used. While this report seeks to be as comprehensive as possible, time and capacity restraints were present, and some policies and practices may have been missed. Future reports will build upon this one as more research is made available and accessed by the Project Bread team.

3. Racial Equity and Child Nutrition

Black, Indigenous, and Latine people have historically been more vulnerable to hunger and experienced higher rates of food insecurity in the United States. In the United States, before the COVID-19 pandemic, 24.2% of African American households, 22.6% of Indigenous households, and 18.8% of Latine households were experiencing food insecurity, compared to 7.6% of white households⁵. BIPOC households are also at increased risk of food insecurity and often recover from financial crises slower than white households⁶. The pandemic also highlighted racial disparities in relation to food insecurity. In Massachusetts, between March 2021 and August 2021, 1 in 9 white households with children were food insecure, compared to 1 in 4 Black and Latine households with children⁷.

These experiences are a result of structural racism that has persisted in this country for centuries, denying BIPOC access to quality jobs, education, housing, healthcare, and more. When we are working toward ending hunger and food insecurity in the United States, we must address the root causes, that work to create these challenges in the first place, such as structural racism. Racial disparities in food security can lead to racial disparities in mental and physical health⁸, education outcomes⁹, and economic achievement¹⁰, which in turn put individuals more at risk for food insecurity in a vicious cycle that can only be broken through the application of a racial equity lens to anti-hunger and anti-poverty policy and work. According to author and researcher Marlysa Gamblin, utilizing a racial equity lens involves “providing targeted support based on need, circumstance, and historical context,” which “creates an environment where all communities can attain equal, and later optimal, outcomes regardless of race¹¹.”

Intersectionality and Child Nutrition

Race is just one of the systemic barriers that exist when it comes to child nutrition. Discrimination and oppression based on sex, gender identity, sexual orientation, immigration status, and (dis)ability often lead to higher levels of food insecurity. Recent data shows that LGBTQ+ people experience food insecurity at rates of 13.1%, almost twice the national rate¹². Food insecurity is also more prevalent among households including persons with disabilities¹³. Furthermore, those who find themselves at intersections of oppressions experience food insecurity at higher rates. One report found that 1 in 4 Black women who did not identify as heterosexual experienced food insecurity in the last 30 days and 1 in 3 experienced food insecurity in the last 12 months¹⁴. When we look at food insecurity, we must consider who experiences food insecurity and why. Systemic and structural oppressions create poverty and hunger, and we must keep this in mind when we conduct anti-hunger and anti-poverty work.

So, what does this mean for child nutrition programs? It means that the needs of BIPOC communities *must* be centered when we consider policy recommendations, investments, and any other types of solutions. While child nutrition programs are already crucial tools in fighting hunger and poverty, their work can be amplified and accelerated by applying a racial equity lens. Structural racism is the status quo. It is normalized and accepted. We must work against this status quo if we truly wish to serve children and their families.

The Curb-Cut Effect

The Curb-Cut Effect is the idea that an investment in one group can remove barriers and create opportunities that benefit all groups. While this term was coined by a disability rights advocate, it can also be applied to racial equity. When we lift up those who are most affected by inequities, we lift up everyone. If we were to invest in policies that benefit BIPOC people (universal meals, equipment assistance grants, summer meal sites, etc.), these investments could help everyone.

For more information about racial equity and its relation to hunger and hunger policy:

- [Getting to Hunger by 2030: Race, Poverty, and Hunger Background Paper, Bread for the World Institute.](#)
- [Racially Equitable Responses to Hunger During COVID-19 and Beyond, Bread for the World Institute.](#)
- [Applying Racial Equity to U.S. Federal Nutrition Assistance Programs: SNAP, WIC, and Child Nutrition, Bread for the World Institute.](#)
- [Ending U.S. Hunger and Poverty by Focusing on Communities Where It's Most Likely, Bread for the World Institute.](#)
- [Food Research and Action Center's Transition Recommendations, FRAC.](#)

4. The National School Lunch Program (NSLP) and the School Breakfast Program (SBP)

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP), administered through the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA), work to ensure that all children can receive breakfast and lunch at school. Through these programs, the federal government provides schools with food and reimbursements that help schools serve healthy, high-quality meals.

Benefits of School Lunch and Breakfast

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) play a crucial role in improving health and educational outcomes, each working to address child hunger and promote good nutrition¹⁵. The National School Lunch Program reduces food insecurity, obesity rates, and poor health, while being associated with a positive impact on student food selection and consumption, especially for fruits and vegetables¹⁶. SBP is associated with improved academic performance, reduced behavior problems, and improved diets among students¹⁷. It has also been found that the healthiest meals children receive are those served in school^{18,19}.

These programs can also be crucial to achieving racial and economic equity. As we have seen amplified by the COVID-19 pandemic, food insecurity affects Black, Latine, and Indigenous households at far higher rates than white households^{20,21}. Importantly, a 2003-2018 study found that “[nutritional] improvements in food consumed from schools were equitable by race/ethnicity, education, and household income²²,” meaning that school meals can be a reliable, equitable resource for BIPOC students. A report by the Rockefeller Foundation and the Center for Good Food Purchasing found that every dollar invested in U.S. school meal programs provides two dollars in health and economic equity benefits²³. Additionally, policies like universal meals²⁴, improved nutrition standards²⁵, intentional investment and funding²⁶, and Farm to School programs²⁷ can work to advance racial equity.

After the Supplemental Nutrition Assistance Program (SNAP), NSLP is the second-largest food and nutrition assistance program in the United States²⁸, operating in around 95 percent of public schools²⁹. In 2019, schools operating NSLP served almost 4.9 billion lunches, or 29.6 million lunches per day, in almost 100,000 schools and institutions³⁰. SBP, while underutilized, still operated in over 90,000 schools and institutions and served 2.45

billion breakfasts annually, or 14.77 million breakfasts per day³¹. On the average day in October 2019, Massachusetts accounted for 2,064 SBP schools and 2,152 NSLP schools, which worked to provide 213,679 breakfasts per day and 493,561 lunches per day.

History of School Lunch and Breakfast

The National School Lunch Program was established under the National School Lunch Act, signed into law by President Harry Truman in 1946³². The program was a response to three problems in the wake of the Great Depression, which led to mass unemployment, poverty, and hunger³³. First was the revelation that many Americans were suffering from diet-related health problems, namely malnutrition, that led to their ineligibility to be drafted. The second was child hunger in general. Through school lunch, schoolchildren received at least one meal per school day. The third problem was the agricultural surplus caused by the inability of the population to buy crops from farmers. The National School Lunch Program opened another market to these farmers, strengthening the agricultural economy. Thus, the Act was passed as “a measure of national security to safeguard the health and well-being of the Nation’s children and to encourage the domestic consumption of nutritious agricultural commodities and other food³⁴.” While the NSLP also provides meals through the Seamless Summer Option (SSO) and afterschool snack options, this rest of this section will focus NLSP in relation to school lunches.

The School Breakfast Program began in 1966 as a two-year pilot project to provide grants to high need schools³⁵. The original legislation required first consideration for program implementation to be given to schools “located in poor areas or in areas where children had to travel a great distance to school³⁶.” After several extensions of the pilot, the program received permanent authorization in 1975 with a continued emphasis on schools in severe need.

The Black Panther Party’s Free Breakfast for School Children Program

Many credit the Black Panther Party and their Free Breakfast for School Children Program with putting pressure on the federal government to create a school breakfast program. Despite fierce opposition from the FBI and local agencies, from 1969 to 1970, The Black Panther Party served breakfast to tens of thousands of children across the country. While these programs were dismantled in the early 1970s, they eventually resulted in the federal government expanding school meal programs and permanently reauthorizing the School Breakfast Program in 1975^{37,38}.

An important step in achieving the goals of the National School Lunch Program, the School Breakfast Program, and many other core child nutrition programs was the passage of the Healthy, Hunger-Free Kids Act in 2010. This Act provided funding and improvements to these programs, allowing the USDA “to make real reforms to the school lunch and breakfast programs by improving the critical nutrition and hunger safety net for millions of children³⁹.” Two of the most important steps this act took were improving the nutrition standards for child nutrition programs and introducing the Community Eligibility Provision, which will each be discussed in further detail in this report. Important to note is the Act led to the development of nutrition standards which encouraged more consumption of fruits and vegetables⁴⁰, less consumption of sugar, fat, and sodium⁴¹, and a decline in childhood obesity among children living in poverty⁴². Meanwhile, the Community Eligibility Provision opened the possibility of universal free meals for students in high-poverty schools, which has been shown to increase student meal participation, student access to meals, and equity among students while decreasing unpaid meal debt⁴³.

Financing School Meals

Under the National School Lunch Program, the federal government provides at least partial reimbursement for every meal provided and the price paid by the child varies based on their household income. Children whose household income falls at or below 130% of the federal poverty line are eligible for free meals. Children whose household income falls between 130% and 185% of the federal poverty line are eligible for reduced-price meals. A school may charge no more than 40 cents for a reduced-price lunch and no more than 30 cents for a reduced-price breakfast. Children whose household income is greater than 185% of the federal poverty line must pay a full price charge determined by the school. Historically, households had to fill out a school meal application each year to receive free or reduced-price meals, which can be filled out at any point in the school year.

The 2004 Child Nutrition and WIC Reauthorization Act introduced a new system in which some students could also receive free school meals without an application. This system, called direct certification, bases eligibility for free meals on household participation in one or more means-tested federal assistance programs (SNAP, TANF, FDPIR) or the student's status as runaway or homeless, in foster care, or enrolled in Head Start. Some states, including Massachusetts, also utilize Medicaid data for direct certification. This process eases a burden for both students and schools while ensuring that as many students are receiving free meals as possible. The percentage of the student body automatically certified due to their participation in these federal benefits programs constitutes a school's identified student percentage, or ISP⁴⁴.

Reimbursement rates for lunch vary slightly based on the need level of a school's population and the nutrition standards of a school's meals. Schools in which 60% or more lunches served during the second preceding school year were free or reduced-price meals are slightly higher. Additionally, schools that meet nutrition standards set by the USDA are offered additional reimbursements of 7 cents per meal, as is shown in the chart below:

NSLP Reimbursement Rates School Year 2020-2021 (Contiguous U.S.)					
	Less than 60% FRP	Less than 60% + 7¢	60% or more FRP	60% or more + 7¢	Price of Meals to Children
Free (at or below 130% of the federal poverty line)	\$3.51	\$3.58	\$3.53	\$3.60	\$0
Reduced-Price (between 130% and 185% of the federal poverty line)	\$3.11	\$3.18	\$3.13	\$3.20	\$0.40 (maximum)
Paid (above 185% of the federal poverty line)	\$0.33	\$0.40	\$0.35	\$0.42	varies [†]

USDA Foods

The USDA also provides donated foods to supplement meal reimbursements (or cash payments in lieu of donated foods). These are not reflected in the reimbursement rates shown.

School breakfast reimbursement rates also vary depending on the need level of a school's population. In keeping with the program's goal of serving high-need schools, schools where at least 40% of the lunches served during the second preceding school year

[†] The School Nutrition Association found that the national average price for a school lunch during the 2016-2017 school year was \$2.48 for elementary schools, \$2.68 for middle schools, and \$2.74 for high schools.

were served free or reduced price qualify as “severe-need” and receive a higher reimbursement rate. The rates can be found below:

SBP Reimbursement Rates School Year 2020-2021 (Contiguous U.S.)			
	Non-Severe Need	Severe Need	Price of Meals to Children
Free	\$1.89	\$2.26	\$0
Reduced-Price	\$1.59	\$1.96	\$0.30 (maximum)
Paid	\$0.32	\$0.32	varies [‡]

Important to note is that, according to the April 2019 USDA School Nutrition and Meal Cost Study, the average cost for a school lunch was around \$3.81, around \$0.21 more than even the highest reimbursement rate⁴⁵. Similarly, the average cost for a school breakfast is \$2.72, \$0.46 more than even the highest reimbursement rate⁴⁶. This can help us understand the study’s finding that the average school food authority (SFA) operated at a small deficit with total revenues covering only 97 percent of reported costs on average⁴⁷.

Additionally, students may receive free meals if their school participates in the Community Eligibility Provision (CEP). CEP allows schools and school districts with an ISP of at least 40% (in which 40% or more of students have been directly certified for free meals) to serve free meals to all students⁴⁸. Schools that opt-in to CEP are reimbursed at the federal free meal rate for a percentage of 1.6 times their ISP. The remaining percentage of meals are reimbursed at the federal paid rate (see table below).

Meal Reimbursements Under CEP		
Identified Student Percentage (ISP)	Meals Reimbursed at Free Rate	Meals Reimbursed at Paid Rate
40%	64%	36%
50%	80%	20%
60%	96%	4%
62.5%	100%	0%

Another option for schools is Provision 2, which requires schools to serve free meals to participating children but reduces application burdens to once every four years and simplifies meal counting and claiming procedures⁴⁹.

Nutrition Standards

All federal child nutrition programs are subject to nutrition standards set by the United States Department of Agriculture, most recently updated because of the passage of the

[‡] The School Nutrition Association found that the national average price for a school breakfast during the 2016-2017 school year was \$1.46 for elementary schools, \$1.53 for middle schools, and \$1.55 for high schools.

Healthy, Hunger-Free Kids Act. The nutrition standards set forth by the Healthy, Hunger-Free Kids Act align with the Dietary Guidelines for Americans, encouraging schools to “increase the availability of fruits, vegetables, whole grains, and fat-free and low-fat fluid milk in school meals; reduce the levels of sodium, saturated fat and trans-fat in meals; and meet the nutrition needs of school children within their calorie requirements⁵⁰.” These standards were “largely based on recommendations made by the Institute of Medicine of the National Academies,” and were expected to “enhance the diet and health of school children and help mitigate the childhood obesity trend⁵¹.” However, it is argued that these standards could go further in areas such as added sugars, sodium, and whole grains⁵².

The Healthy, Hunger-Free Kids Act also required the USDA to establish nutrition standards regarding competitive foods and beverages. These nutrition standards are known as “Smart Snacks in Schools,” and the rule “draws on recommendations from the Institute of Medicine, existing voluntary standards already implemented by thousands of schools around the country, and healthy food and beverage offerings already available in the marketplace⁵³.”

Competitive Foods and Beverages

Competitive foods and beverages are those sold on school grounds that are not part of the federal reimbursable meal programs, such as in à la carte lines, vending machines, school stores, classroom parties, fundraisers, and other school events⁵⁴. These foods and beverages are often sold to raise revenues for schools or subsidize revenues for school districts. While these are important for many schools and school districts, in an ideal world, general reimbursement rates and funding would be enough to operate school food programs without the need for competitive foods and beverages that are often less healthy and often “compete” with reimbursable school food. Jennifer Gaddis, a professor and author also wrote that these foods and beverages are “exacerbating commercialization of the school food environment and sharpening existing race- and class-based divisions in the cafeteria⁵⁵.”

State of Massachusetts

Massachusetts has a long history of leading and innovating regarding school meal policies, beginning even before the National School Lunch Act. Boston had one of the earliest school meal programs in the country, starting in 1894⁵⁶. This was expanded to the entire state in 1913 with an Act that gave cities and towns the opportunity to provide free meals for public schoolchildren⁵⁷. This continued in 1943 with an Act that gave the city of Boston the authority to provide free lunches to undernourished public school children and public schoolchildren facing high need⁵⁸. School meals have since been added to the Massachusetts General Laws, with the legislature adding a requirement that all public schools operating on a “one session day” make lunches available, as well as a requirement that all public schools which have a high number of children in need provide breakfast in 1970⁵⁹.

Increasing Access

Massachusetts has policies that work to increase access to meals for students. Today, public schools in Massachusetts are required to provide lunches to schoolchildren, and severe-need schools (schools that served 40% or more of their lunches at the free or reduced-price rate for the previous two years) with more than 50% of students certified for free and reduced-price meals in the preceding school year are required to participate in the School Breakfast Program⁶⁰. Massachusetts has also established an outreach program that works to increase the participation of low-income children in existing school breakfast programs while encouraging other schools to start a breakfast program⁶¹.

Another of these policies is the requirement regarding the Community Eligibility Provision and Provision 2. In addition to the policies explained in the *An Act Promoting School Nutrition* box below, Massachusetts is also one of the few states that allows school districts to utilize Medicaid data to directly certify students for free meals.

An Act Promoting Student Nutrition

An Act Promoting Student Nutrition, passed in October 2021, created important requirements for Massachusetts public schools regarding CEP and Provision 2, direct certification, and meal debt shaming. The Act added two sections to the General Laws: Chapter 71, Section 72A and Section 72B.

Section 72A⁶²:

- Requires individual schools and districts with an ISP of 50% or higher to implement CEP or Provision 2 to provide universal free school breakfast and lunch to all students (may be waived by a school board voting to decline to participate or in cases of financial hardship) (starting in 2022)
- Requires schools to take steps to maximize federal revenues and minimize debt through direct certification

Section 72B⁶³:

- Requires that no action be taken by schools that would publicly identify a student with school meal debt
- Requires that no denial of meals take place as a form of behavioral discipline or punishment
- Prohibits schools from charging fees or costs to parents in excess of actual amounts owed for meals previously served to the student
- Requires school to notify the student's parent or guardian about school meal debt

Another way Massachusetts is working to ensure more students have access to meals is through alternative breakfast service models, allowing schools to use non-traditional breakfast models, including breakfast in the classroom, grab and go breakfast, and second chance breakfast. These alternative models are now required for schools in which 60% or more of students are eligible for free and reduced-price meals⁶⁴. Massachusetts also allows breakfast in the classroom to be counted as instructional time⁶⁵.

Finally, Massachusetts has adopted language that prevents stigmatizing students, charging excess fees to parents or guardians of students who have meal debt, and communicating school meal debt with students. More information about this policy can be found in the *An Act Promoting School Nutrition* box above.

Improving Quality

Massachusetts has various policies that relate to improving the quality of school meals. One of these is the state reimbursement process for school meals. Massachusetts provides state funding for NSLP based on a state matching funds formula established at the federal level (an additional \$0.055 per lunch)⁶⁶. For schools that are required to offer free breakfast to all students, Massachusetts provides an additional per-breakfast reimbursement payment of up to \$0.10 if breakfast costs exceed federal severe-need reimbursement⁶⁷.

Massachusetts also has various policies that work to increase meal appeal and quality for students through state reimbursements and grant funding⁶⁸, in addition to the work of non-profit organizations in the state, such as Project Bread, which supports school nutrition staff through Child Nutrition Outreach and Community Nutrition Services, formerly known as the Chefs in School program⁶⁹.

Nutrition standards are also a way to improve quality and appeal. Minimum nutrition standards for school meals in Massachusetts public schools are established by the Board of Elementary and Secondary Education⁷⁰, and there are also USDA requirements for federal school meals programs as mandated by the Healthy, Hunger-Free Kids Act discussed

previously. Nutrition standards for competitive foods and beverages for Massachusetts public schools are established by the Department of Public Health⁷¹. These include standards for calories, fats, sugar, sodium, grains, and caffeine⁷².

Federal Policy Recommendations

As NSLP and SBP are federal programs, the federal government will play a significant role in improving the programs. The federal government should take steps to increase access to school meals, as there are still significant barriers for many children across the country. The most important step is to **enact a permanent universal free school meals program for all schools**. Universal meals have a variety of benefits for students, parents, and schools, including reduced administrative costs and application costs⁷³, reduced absenteeism and nurse visits⁷⁴, improvements in learning⁷⁵, higher test scores⁷⁶, reduced perceptions of bullying and fighting⁷⁷, increased feelings of safety inside and outside of school⁷⁸, reduced stigma and fear of losing immigration status⁷⁹, and increased participation in school meals⁸⁰.

If this is not done, Congress should work to expand the Community Eligibility Program. This can be done by **reducing the CEP threshold to 25%**, which would allow schools serving mixed income students to provide meals under CEP. Another step that can be taken is to **allow state pilots for CEP**. This would allow states to provide free school breakfast and lunch statewide if they so choose. Congress could also **expand direct certification** to include children receiving Medicaid and/or Supplemental Security Income benefits, children in households receiving guardianship or adoption assistance or LIHEAP, and children placed in kinship or informal care.

The federal government can take other steps to increase access. This can be done by **expanding free meal status to 300% of the federal poverty line** which would ensure more low-income households have access to free school meals. Congress should **set federal policy regarding meal debt and stigma** that prohibits public identification of students with meal debt or the denial of meals to students with meal debt. As many states, including Massachusetts, have already taken action to prevent these harmful practices, Congress should take this step to ensure equity and consistency across state lines.

Finally, Congress should also pass legislation to **ensure that students have enough time to eat, requiring that schools provide students at least 20 minutes of seat time with their lunch and at least 10 minutes of seat time with their breakfast**⁸¹. This would work to improve access, participation, and consumption while reducing food waste⁸².

The federal government should also take steps to improve the quality of school meals. The most important step that can be taken to do this is to raise reimbursement rates to match the recommended rates of the USDA School Nutrition and Meal Cost Study⁸³. This would require Congress to **provide an additional \$0.50 per breakfast and an additional \$0.25 per lunch**[§]. Similarly, Congress should **increase the identified student percentage multiplier** (explained in the *Financing School Meals* section) **to 2.5**. This would provide schools with more federal reimbursements for school meals in schools that operate CEP. Schools could utilize this extra funding to improve quality and ensure that students receive healthy meals.

Congress should also take steps to ensure the nutrition of school meals. This can be done by **improving nutrition standards** based on recommendations from the Institute of Medicine and the U.S. Dietary Guidelines, along with other independent, objective sources. Congress should also **provide more funding to expand Farm to School programs**. These programs can improve the quality of food and boost local agriculture economies.

[§] In January 2022, the USDA announced an adjustment in school reimbursements to provide an additional \$0.25 per lunch through a waiver to navigate challenges posed by the COVID-19 pandemic; however, this reimbursement is not permanent. Congress should take action to make these changes permanent through federal appropriations.

Increasing Access

While Massachusetts' policy around NSLP and SBP participation is stronger than in many other states and school lunch is required in Massachusetts public schools, many low-income students may still fall through the cracks in schools that are not required to participate in SBP. In school year 2019-2020, Massachusetts ranked 44th in percentage of schools that operate NSLP that also operate SBP (88.2%), and 27th in low-income student participation in school breakfast compared to school lunch (57.2%)^{**84}. For this reason, to work towards the goal of the SBP, Massachusetts should **require school lunch and breakfast to be made available in every school where students are required to eat lunch at school**, as is done in Hawaii⁸⁵. This would ensure that all students are receiving the benefits associated with NSLP and SBP participation. Massachusetts should also work to **ensure that students have enough time to eat, requiring that schools provide students at least 20 minutes of seat time with their lunch and at least 10 minutes of seat time with their breakfast**⁸⁶. This would work to improve participation and consumption while reducing food waste⁸⁷.

Massachusetts also has a policy regarding adoption of the Community Eligibility Provision and Provision 2. These provisions work to reduce administrative costs⁸⁸, provide more access to meals for students, reduce stigma^{89,90}, and improve health and education outcomes^{91,92}. However, it must be stated that CEP and Provision 2 do not reach all students and Massachusetts fails to require all schools eligible for CEP to adopt the provision. Additionally, while Massachusetts' policy prohibiting stigma and harmful meal debt practice works to prevent stigma and unhealthy relationships between students and their schools, lunchroom staff, and food, it fails to address the underlying cause for these practices: the requirement to provide fees for school meals. For this reason, Massachusetts should **adopt a permanent universal free school meals program**, already adopted by California and Maine.

If a permanent universal free school meal program is not enacted, Massachusetts should take steps to ensure as many students are receiving free school meals as possible. This can be achieved in a variety of ways, including the following:

- **Expanding Free Meal Status.** Massachusetts should expand free meal access for households at or below 300% of the federal poverty line, as has been done in Oregon. This would qualify more students for free meals and would be a crucial step in ensuring that students and their families are not forced to choose between food and other important expenses.
- **Requiring Participation in the Community Eligibility Provision for Eligible Schools.** Massachusetts should require eligible schools to adopt CEP and provide funding to match federal reimbursement to ensure 100% of school meals are funded in schools that operate CEP. Similar to a policy enacted in Oregon, this would work to maximize federal funding for schools and remove financial barriers for schools with a lower percentage of free and reduced-price eligible students, allowing CEP to cover more students in Massachusetts.
- **Eliminating the Reduced-Price Fee.** Massachusetts should provide state funding to eliminate the \$0.30 Reduced-Price Fee for breakfast and \$0.40 for lunch, as has been done in eleven states, including Maine, Vermont, North Carolina, and New Jersey, as well as the District of Columbia. This would ensure more students are eating breakfast without having to worry about financial barriers.

** Reaching a ratio of 70 low-income students participating in SBP to 100 participating in NSLP would have brought Massachusetts an additional \$8,756,571 in federal funding for school year 2019-2020

- **School Meal Application Streamlining.** Massachusetts should create a statewide online school meal application system that works to alleviate application burdens for schools and parents. This system should also utilize state data for direct certification, like systems in New York, Florida, Mississippi⁹³.

While existing legislation requiring alternative breakfast models is a testament to Massachusetts' dedication to providing school meals to students and will help many schools transition to alternative models, many students are still left out in schools in which less than 60% of students are eligible for free or reduced-price meals that chose not to adopt an alternative breakfast model. Massachusetts should follow in the footsteps of West Virginia in **requiring all schools to adopt an approved alternative breakfast model**⁹⁴. Short of this, Massachusetts should at least **lower the threshold to require schools with 40% of students eligible for free or reduced-price meals to implement alternative breakfast models** to include more schools serving mixed and middle-income communities. Alternative breakfast models promote food security, equity, and access for children who often have no say whether they arrive at school in time for breakfast.

Improving Quality

The most crucial factor in improving quality is funding. While Massachusetts' existing additional reimbursement payments are great steps toward increasing school food authorities' revenues, they do not go far enough in ensuring that schools have the funding they need to provide the best quality, nutritious meals to students. Massachusetts should work to provide state funding to increase the reimbursement rates to match the recommended rates of the USDA School Nutrition and Meal Cost Study⁹⁵. This would require Massachusetts to **utilize state funds to provide an additional \$0.50 per breakfast and an additional \$0.15 per lunch**.

Existing funding and programs are crucial in making sure students have healthy, quality meals that they want to eat, but, again, more work can be done to improve quality, as well as improve local food systems, encourage consumption, reduce food waste, and remove barriers. One solution to some of these problems is the establishment of a **Farm to School grant program that works to provide equipment, training, and nutrition education to schools**. This program should also **explicitly give procurement preference to small producers and producers of color**, which would work toward racial equity and improving the local economy^{96, 97}. In keeping with the goals of this program, Massachusetts should also **utilize state funding to provide an additional reimbursement of \$0.10 for any child nutrition program meal that includes a locally-grown fruit, vegetable, or legume**, as is done in Michigan⁹⁸. Another solution is a **state funding match for federal equipment assistance grants**, as is done in California⁹⁹. Equipment assistance grants can allow schools to purchase equipment needed to serve healthier meals, improve food safety, and increase access to meals¹⁰⁰. These grants could also work toward racial equity by attempting to address the legacy of housing and education discrimination in the United States that has led to schools with majority-BIPOC students receiving less funding and having less access to important resources like cafeteria equipment¹⁰¹.

Finally, nutrition standards are necessary to ensure high quality school meals. While Massachusetts currently has nutrition standards for both reimbursable school meals and competitive foods and beverages, there are many areas in which they can be improved, including adding or strengthening standards for added sugar, sodium, and whole grains. Massachusetts should **form a working group to develop stronger nutrition standards** based on the United States Dietary Guidelines, the Institute of Medicine, and whatever other recommendations they see fit. Once Massachusetts develops and establishes these optional state nutrition standards, Massachusetts should **use state funding to provide an additional reimbursement of \$0.10 to any child nutrition program meal that meets them**, as is done in Connecticut¹⁰². This would assist school nutrition professionals in preparing and serving these meals.

Schools/School Districts Recommendations

Schools and school districts can also have some agency to make decisions regarding school meal access and quality. While there are standards for many aspects of the work and financial barriers that can prevent schools and school districts from taking certain action, there are still various steps that can be taken to make school meals programs as effective as possible. First, while CEP is not available for all schools, schools that may qualify for CEP but foresee logistical and financial challenges can **work with local organizations, like Project Bread, to make CEP a viable option and provide free meals for their students**. Those that do not qualify for CEP or do not choose to adopt CEP should still work to **provide a regular, reimbursable meal to all students, regardless of their ability to pay** through Provision 2 for breakfast, lunch, or both.

A major step that can be taken by schools and school districts is spreading information and helping students and their parents and guardians regarding school meals. Schools should **conduct an aggressive school meal application outreach campaign** that encourages families to submit applications, including importance, timing, potential incentive, while ensuring accessibility of applications. This may include broadly distributing school meal applications, aiding at back-to-school nights, afterschool programs, and other gatherings with parents and guardians, incentivizing submission with prizes, working with trusted community stakeholders, and improved messaging. This campaign would work to increase ISP and bring students into free school meals, avoiding school meal debt before it can accumulate¹⁰³.

Schools can also take steps to increase meal appeal and subsequent participation. Schools should, to the extent possible, work to **incorporate scratch cooking and culturally-relevant meals** in their school meal programs. These would help increase the appeal of school meals and consumption of fresh fruits and vegetables, promote the use of fresh ingredients over prepackaged, processed items¹⁰⁴, as well as creating a sense of community and opportunities for students to try to new foods¹⁰⁵. Schools can also consider **scheduling lunch for after recess**, which is shown to improve participation and consumption¹⁰⁶. Of course, these steps are not enough if students do not have sufficient time to eat school lunch and breakfast. For this reason, schools should **provide students at least 20 minutes of seat time with their lunch and at least 10 minutes of seat time with their breakfast**¹⁰⁷.

5. Fresh Fruit and Vegetable Program (FFVP)

The Fresh Fruit and Vegetable Program is a program that provides funding for fruits and vegetables at elementary schools. Its goals are to introduce children to fresh fruits and vegetables, to increase overall acceptance and consumption of fresh, unprocessed produce among children, and encourage healthier school environments by promoting nutrition education¹⁰⁸.

Benefits of FFVP

Fruits and vegetables are crucial for a child's diet, providing important nutrients like calcium, potassium, fiber, magnesium, and vitamin E, along with disease prevention¹⁰⁹. The Fresh Fruit and Vegetable Program (FFVP) is a vital program that promotes fruits and vegetables in elementary schools with a high concentration of students who are eligible for free and reduced-price meals in the United States¹¹⁰. This program works to introduce children to new fruits and vegetables and increase acceptance and consumption of fruits and vegetables. The program also promotes nutrition education, which can work to create a healthier school environment. While the program has not operated for long, it has been

shown to be effective in its goals. A USDA study found that, on the days schools participated in FFVP, students consumed around one-third of a cup more fruits and vegetables than students in schools that did not participate¹¹¹. This is hypothesized to be from both direct consumption of FFVP foods and from indirect influence and knowledge outside of school¹¹².

There are also racial and socioeconomic disparities in access to and consumption of fruits and vegetables¹¹³. To combat this, FFVP prioritizes schools with the highest percentage of students who are certified for free and reduced-price meals. The aforementioned study found that program operates in elementary schools with higher rates of students who are eligible for free and reduced-price meals and with higher rates of non-white students, which can work to address the gap in fruit and vegetable consumption for children from historically-disadvantaged groups.

History of FFVP

The Fresh Fruit and Vegetable Program was first piloted in 2002, authorized by the Farm Security and Rural Investment Act of 2002. This Act authorized four states and one Indian Tribal Organization to operate the program. The program was expanded again in 2004 and 2006. The 2008 Farm Bill expanded the program nationwide, which has continued to today¹¹⁴.

Funding of FFVP

Every fiscal year, Congress appropriates an amount for FFVP to the USDA's Food and Nutrition Service to be designated to states. For fiscal year 2021, the total funding available to FNS was \$202.9 million¹¹⁵. The funding follows the following formula¹¹⁶:

- All 50 states and the District of Columbia receive an annual grant equal to one percent of the funds available.
- Remaining funds are allocated to all 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands based on the proportion of the state population to the U.S. population.

From this allocation, elementary schools receive \$50 to \$75 dollars per student per school year and submit monthly reimbursement claims for fresh fruits and vegetables and some other costs.

State of Massachusetts

In Massachusetts, the FFVP is administered by the Department of Elementary and Secondary Education. The Department operates the program through agreements with local school food authorities. In school year 2020-2021, 185 Massachusetts elementary schools participated in FFVP.

Federal Policy Recommendations

While the program has proven effective in the schools in which it operates, only elementary schools can currently operate the program. As it stands, this leaves an opportunity to address teen hunger unmet. A troubling report from the state of Maryland found that one in four students in middle and high school lacks consistent access to the healthy food they need¹¹⁷. The report also found that rates of food insecurity are more than double for Black, Latine, and Indigenous middle and high school students compared to their white counterparts. Congress could help to address this issue if it were to **expand FFVP to include middle and high schools**.

Congress could work toward advancing the goals of the program by **increasing funding for FFVP**. This would ensure that as many schools as possible are receiving this funding and ensure that the funding is sufficient to meet the needs of participating students.

6. Afterschool Nutrition Programs (CACFP and NSLP)

Afterschool nutrition programs can be operated through two programs: the At-Risk Afterschool Meal component of the Child and Adult Care Program and the National School Lunch Program. CACFP provides funding to afterschool programs that serve a meal and/or snack to children in areas in which 50 percent or more of students are eligible for free or reduced-price meals. NSLP offers reimbursements for up to one snack per child per day. Programs operating through both CACFP and NSLP must offer educational or enrichment activities.

Benefits of Afterschool Nutrition Programs

Afterschool meal programs through the Child and Adult Care Program and the National School Lunch Program fill a large gap for children who may not have access to healthy meals at home. These programs work to tackle childhood food insecurity by providing low-income children with nutritious snacks and suppers that contribute to their healthy growth and development¹¹⁸. On the days school-aged children eat afterschool meals, they have higher daily intake of fruits, vegetables, milk, and key nutrients compared to days they do not¹¹⁹. CACFP programs also offer nutrition education lessons that work to help children develop healthy eating habits. CACFP and NSLP provide funding for afterschool meals and snacks, ensuring that children and providers in low-income areas have the nutrition they need. The funding that covers, or at least subsidizes, meals and snacks can free up other funding previously used for food costs for programs to improve or expand programming, meaning that CACFP and NSLP are crucial to ensuring afterschool programs can provide holistic and beneficial services.

On the average day in October 2019, almost 1.5 million children participated in an afterschool supper program and almost 1.5 million children participated in an afterschool snack program¹²⁰. In Massachusetts, during the same time period, over 17,000 children participated in an afterschool snack program every day and over 23,000 children participated in an afterschool supper program¹²¹.

The CACFP At-Risk Afterschool Supper and Snack Program can also provide meals on weekends, school holidays, and school breaks during the school year to children on the CACFP roster¹²². During these times, one meal (breakfast, lunch, or dinner) per child per day may be served, along with one snack per child per day.

Afterschool Programming

As afterschool meal programs can provide educational or enrichment activities, these programs can also help draw children into safe learning environments which promote their academic, social, and emotional development while decreasing risky behaviors¹²³. By providing a safe, supervised environment, afterschool programs keep children protected during the hours kids are most likely to commit or become a victim of violent crime¹²⁴. These benefits also show that afterschool programs are cost-effective, saving at least \$3 for every \$1 invested by “increasing children’s future earning potential, improving their performance at school, and reducing crime and welfare costs¹²⁵.”

Afterschool programs can also help parents and guardians who may struggle to pick up their children at the end of the regular school day, such as those who work nontraditional hours, have long commutes, or experience a variety of other challenges. According to U.S. Census data, 43% of children live with a parent who is working a “non-standard schedule¹²⁶.”

Afterschool snacks were piloted by the USDA in 1994 through a program that provided free snacks for teens aged 13 to 18 in afterschool programs located in high-risk areas¹²⁷. This became known as the At-Risk Afterschool Snack component of the CACFP and was made permanent in 1998. The same Act that allowed CACFP to provide funding for afterschool snacks also authorized the NSLP Area-Eligible Snack Program to do the same¹²⁸. This became an option for schools and school-sponsored sites that operated the National School Lunch Program.

In 2000, Congress created the Afterschool Supper Program through CACFP; however, this was only available in six states. States were gradually added to the program until 2010 when the Healthy, Hunger-Free Kids Act expanded the program to all states, including Massachusetts¹²⁹. In the seven years after the program became permanent and nationwide, the number of afterschool suppers served annually grew by 500%¹³⁰.

Today, afterschool suppers and snacks are served through both the National School Lunch Program (NSLP) and the Child and Adult Care Food Program (CACFP)¹³¹. NSLP operates the After-School Snack Program, as well as the Area-Eligible Snack Program for schools in which at least 50 percent of students qualify for free or reduced-price meals. Through these programs, NSLP provides reimbursements to public and private nonprofit schools. CACFP operates the At-Risk Afterschool Supper and Snack Program in public and private nonprofit schools where at least 50 percent of the students are eligible for free or reduced-price meals, along with local government agencies and private nonprofit organizations within the attendance boundary of a public school where at least 50 percent of the students are eligible for free or reduced-price meals. Sites that do not qualify under these requirements may choose to operate the Outside-School-Hours Care component of the CACFP, under which meals are reimbursed for children ages 12 and under, according to each child's eligibility status¹³².

Financing Afterschool Nutrition Programs

Afterschool meals, whether through NSLP and CACFP, are subsidized by the federal government through per meal reimbursements. All snacks and suppers provided through the CACFP At-Risk Afterschool Meal Program and the NSLP Area-Eligible Snack Program are provided free to all children and reimbursed at the free rate (\$3.66 for supper and \$1.00 for snack). Snacks served through NSLP at sites that do not meet the requirements of the area-eligible program are reimbursed based on a child's eligibility. The per snack reimbursement rates for the 2021-2022 school year can be found below¹³³:

Afterschool Snack Reimbursement Rates	
	Snack
Free	\$1.00
Reduced-Price	\$0.50
Paid	\$0.09

COVID-19 Waivers

Due to the COVID-19 pandemic, the USDA offered various flexibilities and waivers in the 2020-2021 school year. USDA allowed schools and sponsors to utilize the Summer Nutrition Programs to serve suppers and snacks. The USDA also waived the area eligibility requirement for the CACFP At-Risk Afterschool Supper and Snack Program and the NSLP Snack Program and reimbursed all meals at the free rate. Finally, the USDA waived the

educational and enrichment requirements. These, along with other waivers and flexibilities, helped increase the number of meals served during the school year.

Nutrition Standards

As with the other programs operated through CACFP, the At-Risk Snack and Supper Program must meet nutrition standards set for CACFP most recently updated in 2017 because of the Healthy, Hunger-Free Kids Act of 2010¹³⁴. These standards are based on the Dietary Guidelines, recommendations by the National Academy of Medicine, and stakeholder input. Among other improvements to previous standards, these standards include a greater variety of vegetables and fruits, more whole grains, and less added sugar and saturated fat¹³⁵. Snacks served through NSLP must include two servings of the following: fluid milk, meat or meat alternate, vegetable or fruit, and whole grain-bread or pasta¹³⁶.

State of Massachusetts

While Massachusetts does not have any policies directly targeting afterschool meal programs, many policies that affect CACFP or NSLP, such as grant funding, training, and support, can lead to improvements in afterschool meals and snacks. As with all other aspects of CACFP, the CACFP At-Risk Afterschool Program is directly administered by the Department of Elementary and Secondary Education (DESE)¹³⁷.

Federal Policy Recommendations

Millions of children rely on afterschool meals, but many children who could qualify for afterschool meals or snacks lack access. Congress should pass legislation that would improve access and awareness to the program. One way this could be done is to **eliminate the area-eligibility test** for CACFP afterschool suppers and snacks. This would allow those who wish to serve afterschool meals and snacks to children the ability to do so. If this is not done, Congress should at least **lower the area-eligibility test for NSLP and CACFP from 50 percent or more of students in the area-eligible for free and reduced-price meals to 33 percent**. These would allow more schools to participate and receive reimbursements at the free rate while making sure children in communities with significant numbers of low-income households have access to snacks and meals.

Additionally, Congress should **provide funding to support and expand afterschool programs**. In 2020, Afterschool Alliance found that for every child in an afterschool program, three are waiting to get in¹³⁸. This means that there is a large unmet demand for afterschool programs, especially in low-income areas. Funding should also be used for **grants to increase access to meals in rural and other underserved communities**. This funding can be used to create or expand innovative approaches to food service, provide transportation to and from afterschool programs, and/or operate mobile meal trucks.

Congress should also take steps to improve the quality of afterschool meals. As well as providing funding to support and expand these programs, Congress should **raise reimbursement rates for suppers** to match the rate of suppers served under the Summer Food Service Program (\$4.25), which would require an additional \$0.60 per meal.

Congress should also pass legislation to improve quality by reducing the administrative burden faced by schools, organizations, and agencies serving meals and snacks to students. The first way this can be done is by **expanding NSLP to allow schools to serve suppers through the program**. Currently, schools who want to serve suppers to students must operate a CACFP program, which can create unnecessary burdens for schools. Another step is to **streamline the CACFP Afterschool Supper and Snack Program and the Summer Food Service Program (SFSP)**. Currently, many of those who operate both CACFP afterschool programs and SFSP are required to apply for and operate two different programs with separate eligibility criteria and program requirements to provide

meals year-round. Streamlining these programs would allow for schools and sponsors to operate afterschool and summer programs without unnecessary administrative burdens.

State Policy Recommendations

In 2020, Massachusetts ranked 17th in average daily participation in afterschool supper programs¹³⁹. While this was an improvement from 2019, many children were left without an important nutritious meal. If Massachusetts had reached the Food Research and Action Center's goal of a 15:100 ratio for afterschool suppers and school lunches, the state would have brought in an additional \$2,918,882 in federal funding while providing over 43,000 more meals per day in 2020¹⁴⁰.

To close the gap in afterschool meal program participation, Massachusetts should take steps to increase access to afterschool programs. Massachusetts should **require school districts that meet the federal area-eligibility guidelines for the CACFP At-Risk Afterschool Supper Program to participate and provide meals to students who attend afterschool programming**, as is required in Maine¹⁴¹. This would ensure that children in areas with high concentrations of low-income households have access to afterschool meals and programs. Massachusetts should also **provide technical support and outreach** through the Department of Elementary and Secondary Education to educate potential providers, recruit students, and facilitate the easy creation or expansion of afterschool programs.

Massachusetts should also take steps to improve quality, particularly by making afterschool programs less financially burdensome for providers. Massachusetts should **provide grant funding to expand afterschool meal programs**, as is done in Oregon¹⁴². This could be done to provide equipment, capacity, transportation, or any other needs a provider may have that currently prevents them from starting a program or prevents them from operating to their full capacity. Massachusetts should also **provide state funding to raise reimbursement rates for suppers** to match the recommended rate of the USDA School Nutrition and Meal Cost Study. Because of their similarities, the reimbursement rate for suppers should be the same as the recommended rate of suppers served under the Summer Food Service Program (\$4.25), which would require an additional \$0.60 per meal. Massachusetts should also provide **funding to reimburse CACFP At-Risk sponsors with \$0.10 for every meal** that includes a locally-grown fruit, vegetable, or legume.

Provider Recommendations

While an afterschool snack can be important for many children, some may need more to make it through the afternoon. Additionally, some children may rely completely on school meals for nutritious meals. For this reason, providers should explore the option of **moving from an afterschool snack to an afterschool supper**¹⁴³. This meal can be served at any point during the afterschool program and would bring in a significantly higher reimbursement rate (\$3.66, compared to \$1). Providers should also work to **ensure that they are providing programming and food that is linguistically- and culturally-relevant** based on the needs of their communities.

7. Summer Nutrition Programs (SFSP and SSO)

Summer nutrition programs mainly operate through two programs: the Summer Food Service Program and the Seamless Summer Option. Both options reimburse program operators who serve meals and snacks to children in areas in which 50 percent or more of students are eligible for free or reduced-price meals. The main difference in the programs is the reimbursement rates for each program and the nutrition standards for each program (SSO follows NSLP/SBP rates and nutrition standards). Additionally, SSO can only be operated by schools.

Benefits of Summer Meal Programs

During the summer, when school is not in session, millions of students lose access to school breakfasts, lunches, and afterschool snacks and meals. Summer meal programs step in to provide free meals and snacks to children in low-income areas, working to feed children who might otherwise be hungry or food insecure. These programs are crucial tools in combating food insecurity and weight gain during the summer months¹⁴⁴. In July 2019, almost 2.8 million children participated in a summer nutrition program on an average day, helping ease a worry and burden for many of these children and their families. In Massachusetts, 1,149 sites served summer meals during the summer of 2019.

Summer nutrition programs also work to reduce food insecurity and childhood obesity in rural communities, which historically have greater odds of experiencing these challenges. A recent study also found that 72% of rural parents stated that summer programs help working parents keep their jobs¹⁴⁵.

By subsidizing food costs, summer nutrition programs also free up funding that can be used to provide more holistic services to participants. Summer programs can also provide educational, enrichment, or recreational activities that can prevent knowledge loss while keeping students in a safe environment. Summer learning loss is a widely-studied and important phenomenon, as achievement scores over summer vacation decline by one month's worth of school-year learning on average¹⁴⁶. Especially important is that many researchers have found that summer learning loss is worse among Black and Latine students¹⁴⁷. Summer programs that are well-funded and accessible can help reduce these effects, helping students thrive during the summer and stay ready to return to school in the fall.

History of Summer Meal Programs

Today, there are two primary paths to providing summer meals for children. First, the Summer Food Service Program (SFSP) is available in areas in which 50 percent or more of the children qualify for free or reduced-price meals, sites where 50 percent or more of the children enrolled are eligible for free or reduced-price meals, and sites that serve migrant populations, and camps. Second, the Seamless Summer Option (SSO) is available for schools that operate NSLP during the school year in areas in which 50 percent or more of the children qualify for free or reduced-price meals. There is not a requirement for educational and enrichment activities for this program.

Summer NSLP and SBP

The National School Lunch Program and the School Breakfast Program are available for schools hosting an academic summer school; however, this chapter will focus primarily on SFSP and SSO.

The Summer Food Service Program has its roots in the Special Food Service Program for Children, which was created in 1968¹⁴⁸. This program had two parts, Child Care and Summer, until a separate Child Care Food Program and Summer Food Service Program were authorized in 1975. In 1981, the Omnibus Budget Reconciliation Act of 1981 was passed, eliminating private nonprofit organization sponsors (except for schools and camps) and raising the area-eligibility threshold to 50%¹⁴⁹. This led to a drastic decrease in children and sites. While many efforts have been made by Congress to increase participation, remove some requirements for sponsors, and streamline operations, participation has remained stable at around 2 million children per year¹⁵⁰.

The Seamless Summer Option has a much shorter history, codified into the National School Lunch Act in 2004 by the Child Nutrition Reauthorization Act of 2004¹⁵¹. Importantly,

this Act also made changes to nutrition promotion and requirements and provided funding for rural transportation grants.

Funding Summer Meal Programs

Site Definitions

Open sites: sites located in an area where 50 percent or more of the children qualify for free or reduced-price meals; sites are open to the community, meaning anyone child 18 or under can participate without registration or identification

Enrolled sites: sites where 50 percent or more of enrolled children are eligible for free or reduced-price meals, determined by approved application or location in eligible area

Migrant sites: sites with certification by a migrant organization that the site serves children of migrant workers

Camps: sites which offer a regularly scheduled food service as part of an organized program for enrolled children; reimbursed only for meals served to eligible children

The summer nutrition programs provide funding to sponsors to offer healthy meals. SFSP and SSO may serve two meals (breakfast and lunch or supper) at open or enrolled sites, and they may serve three meals at camp or migrant sites. All sites except camps are reimbursed at the maximum reimbursement under SFSP.

Sites operating SFSP can be reimbursed for meal costs, which is a combination of operating costs and administrative costs. These rates differ for rural or self-prep sites and all other sites. Rural sites are sites that are not within a Metropolitan Statistical Area or sites that are within an MSA but geographically-isolated, as determined by a state agency and a Food and Nutrition Service regional office¹⁵². Self-prep sites are sites that prepare their own meals on-site or at a central facility instead of purchasing them from vendors. The combined reimbursement rates for 2021 can be found below:

SFSP Reimbursement Rates (Combined)		
	Rural or Self-Prep Sites	All Other Sites
Breakfast	\$2.4625	\$2.4150
Lunch or Supper	\$4.3175	\$4.2500
Snack	\$1.0200	\$0.9975

Under SSO, all area eligible sites are reimbursed at the free rate. In camps and closed enrolled sites in non-area eligible locations, meals are reimbursed at the school meal rates for free and reduced-price meals with no reimbursement for paid meals.

Donated Foods

The USDA also provides donated foods to supplement meal reimbursements (or cash payments in lieu of donated foods) for schools that participate in NSLP. These are not reflected in the reimbursement rates shown. It is also important to note that this is an important benefit that non-school sponsors do not have access to.

Nutrition Standards

As with other child nutrition programs, sites operating SFSP and SSO must follow specific summer meal pattern requirements set by the USDA¹⁵³. It is important to note that these requirements are more flexible than the NSLP requirements for the school year; however, SFAs that participate in NSLP or SBP may substitute the summer meal patterns for the meal pattern requirements set by the USDA for school meals¹⁵⁴. These meal patterns vary based on meal type (breakfast, lunch or supper, and snack) and are designed to provide nutritious and well-balanced meals to program participants. Most participants follow the SFSP meal pattern requirements¹⁵⁵.

State of Massachusetts

In Massachusetts, SFSP is commonly referred to as Summer Eats but still functions in the same way. Massachusetts currently provides funding for SFSP: Expansion, Access, Training and Start-Up (SFSP EATS) grants for new and existing SFSP sponsors to increase participation, support new and existing sites in low-income areas, improve accessibility and nutrition for existing programs, expand Farm to Summer initiatives, and extend program length for the full summer break¹⁵⁶. Approximately \$423,000 in SFSP EATS grant funding was available for Fiscal Year 2021.

Massachusetts also operates an SFSP outreach program established by the Board of Education¹⁵⁷. The state currently contracts with Project Bread's Child Nutrition Outreach Program for this outreach. This program includes outreach efforts to public schools, public entities, and private non-profit agencies which would be eligible to provide SFSP, including information and incentives to encourage sponsorship or participation as a meal prep site. The program's operations target communities and schools with the highest percentage of eligible children, along with communities with potential participants who are linguistic minorities, encouraging and assisting them in maximizing use of federal resources. It also provides outgoing support and technical assistance and reviews and develops training methods and materials.

Federal Policy Recommendations

Summer nutrition programs are crucial tools in fighting childhood hunger and food insecurity, but, currently, they are underutilized. In July 2019, only 13.8 children received a summer lunch for every 100 low-income children who participated in NSLP during the school year¹⁵⁸. This means that far too many children are missing out on summer meals and snacks.

Congress should take steps to address issues in participation by increasing access. The first is providing funding and changing policies to increase access. Congress should provide funding for **grants for transportation to and from summer meal sites and mobile meal trucks** to reach rural and under-served areas. This would work to eliminate a barrier that currently exists in many rural, unsafe, and/or low-income areas.

¹⁵⁹. Additionally, funding should be provided for **investments to serve low-income children**, such as targeted outreach and site recruitment. Finally, Congress should **allow pilots for and extensions of existing programs that offer summer meal delivery to central locations**. This has been done by many sites during the COVID-19 pandemic, and moving forward, will offer a safe, accessible way to access summer meals. One such consideration is to allow non-congregate meals during the summer, which led to a large increase in meals served in 2020 and 2021.

Congress should also **eliminate the area eligibility threshold** for SFSP to allow any sites to provide summer meals, as was done during the COVID-19 pandemic. This would work to allow any site that wishes to serve meals to do so. If this is not done, the **area eligibility threshold should at least be lowered to the pre-1981 rate of 33%**, which would

increase the number of children who can participate in a summer meal program. Congress should also **mandate participation in school districts that meet the federal area eligibility requirements for open sites**. This would ensure that more children have access to summer meals and that sites have a responsibility to feed more children.

Congress should also take steps to increase the viability and quality of summer programs. The first way this can be done is by **allowing open and enrolled sites to serve a third meal**. This would better support working parents and low-income children who may not have access to meals at home, working to ensure more consistent access to meals. It would also keep the summer months consistent with the school year, during which students may receive three meals and even a snack. Congress should also **increase the funding allocated for summer programming**. This would ensure that there are sufficient affordable summer programs for children to participate in and provide a foundation site at which meals can be served, working to provide children with the meals and enrichment activities needed to succeed. Finally, Congress should **streamline SFSP and the CACFP Afterschool Meal Program to allow sponsors to feed children year-round through SFSP**, rather than requiring application and operation of CACFP for afterschool meals. This would reduce paperwork and other administrative burdens for sponsors, freeing time and money for feeding and engaging students and potentially encouraging more sponsors for the programs.

Summer EBT

Congress should also provide funding to expand the Summer Electronic Benefit Transfer (EBT) program. This program gives families access to additional resources during the summer months and is a great complement to summer nutrition programs. A report by the USDA Food and Nutrition Service found that a benefit of \$60 per month per child reduced the most severe category of food insecurity among children by one-third¹⁶⁰. This benefit also led to positive changes in nutritional outcomes. This can also be done through state funding, as is done in Maryland¹⁶¹.

State Policy Recommendations

Summer nutrition programs are underutilized in the United States, and Massachusetts is no exception to this. In 2019, 16.5 Massachusetts children participated in a summer nutrition program for every 100 children who participated in NSLP¹⁶². If Massachusetts were to reach the goal ratio of 40:100 set by the Food Research and Action Center, the state would have served 74,542 children and brought in an additional \$6,506,436 in federal funding¹⁶³.

Massachusetts should take action to increase access to summer meals. One way this can be done is to **mandate school district participation in summer meal programs for school districts that meet federal area eligibility requirements**, as is done in Illinois¹⁶⁴ and Texas¹⁶⁵. Additionally, Massachusetts should **provide funding for grants for transportation and mobile meal trucks** that increase access for rural and under-served communities. Access can also be increased by **providing funding for summer programming**. This would ensure that there are sufficient summer programs for children to participate in and provide a foundation site at which meals can be served, working to provide children with the meals and enrichment activities needed to succeed.

Massachusetts should also work to improve the quality of summer meals. This could be done if Massachusetts were to provide **funding to reimburse SFSP sponsors with \$0.10 for every meal** that includes a locally-grown fruit, vegetable, or legume. This policy would work toward the state's Farm to Summer goals.

Provider Recommendations

Providers should work to maximize their impact through **engagement and partnerships with community resources and organizations**. Community resources like libraries, faith-based groups, universities, community colleges, and more can be used for

space, programming, transportation, etc., which can save money and increase familiarity, comfort, and access. Partnerships with local anti-hunger organizations, like Project Bread, can provide outreach tools, technical assistance, and ways to maximize use of federal resources. Providers should also work to **ensure that they are providing programming and food that is linguistically- and culturally-relevance**, based on the needs of their communities.

Providers should also work, whenever possible, to **provide programming at summer meal sites**. As summer learning loss and lack of child care are large challenges in many communities, sites should attempt to provide educational and enrichment activities in addition to summer meals.

8. Child and Adult Care Food Program (CACFP)

The Child and Adult Care Program provides reimbursements for meals and snacks to children and adults who are enrolled at participating child care centers, day care homes, adult day care centers, as well as to children in afterschool care programs, children residing in emergency shelters, and adults over the age of 60 or living with a disability and enrolled in day care facilities. CACFP also provides funding for administrative costs for day care homes.

Benefits of CACFP

Child Care Centers and Day Care Homes

The Child and Adult Care Food Program (CACFP) plays a significant role in addressing the hunger needs of children and adults in the United States through various services; however, this report will focus on the childcare centers and day care homes aspects of CACFP.

CACFP supports the health of children through nutritious meals and snacks, working to reduce food insecurity, improve dietary intake and health, protect against obesity, while boosting learning and development¹⁶⁶. Access to meals, particularly healthy meals, plays a crucial part in early childhood development. A 2019 study found that household food insecurity is related to “significantly worse general health, some acute and chronic health problems, and worse health care access...” among children¹⁶⁷. Further, experiencing food insecurity in early childhood has been shown to lead to lower academic achievement and increased behavioral and emotional problems¹⁶⁸. However, households with children under the age of six experience food insecurity at much larger rates¹⁶⁹. CACFP is important in addressing these issues, as it helps to “close a significant gap in the provision of nutritious food to more than 50 percent of pre-school aged children attending child care centers in the nation at a crucial state of their development¹⁷⁰.”

As with other child nutrition programs, CACFP, while underutilized, provides crucial care and meals that children need. In 2018, CACFP provided 2 billion meals and snacks to 4.5 million children in child care centers, family care homes, and afterschool programs¹⁷¹. In Massachusetts, 179 child care sites were operated through CACFP in 2021.

Aside from its impacts on the children who participate, CACFP is immediately beneficial to many aspects of the economy. The program provides ongoing training, technical assistance, and support for participating providers¹⁷², which can help to create jobs in the care sector. CACFP operation involves purchasing necessary healthy foods, which supports the agricultural sector. CACFP also provides care that helps parents and guardians of children and adults work with fewer care-related stressors¹⁷³, something that is especially important today, as children increasingly have parents and guardians that are working outside of the home, as opposed to having a stay-at-home parent or guardian¹⁷⁴.

History of CACFP

While government support for child care food programs began as early as 1965, the Child and Adult Care Food Program as we know it began in 1987 when the Child Care Food Program (CCFP) was expanded to allow adult day care centers to participate. CCFP was officially renamed to CACFP in 1994. Today, CACFP provides a supplemental reimbursement for the provision of nutritious meals and snacks to participating organizations, such as children and adults in childcare centers, day care homes, and adult day care centers, along with children and youth in afterschool care programs, children residing in emergency shelters, and adults over the age of 60 or living with a disability and enrolled in daycare facilities¹⁷⁵. As previously stated, this chapter will focus on children in childcare centers and day care homes. Afterschool meals through CACFP will be covered in the chapter titled *Afterschool Meals*.

Financing Under CACFP

The Child and Adult Care Food Program provides meal reimbursements that vary based on type of provider and child need. Each provider may be reimbursed for no more than two meals and one supplement (snack) per day per child below the age of 12 (age 15 for migrant children; any age for children with disabilities)^{176,††}. To receive reimbursement, providers must comply with the required meal patterns and provide documentation of a child's eligibility. The reimbursement rates for child care centers from July 1, 2021 to June 30, 2022 can be found below:

Meals Served in Child Care Centers			
	Supplement (Snack)	Lunch and Supper	Breakfast
Free	\$1.00	\$3.66	\$1.97
Reduced-Price	\$0.50	\$3.26	\$1.67
Paid	\$0.09	\$0.35	\$0.33

Reimbursement rates for day care homes are tiered. Homes in low-income areas or operated by a person or people with incomes at or below 185% of the federal poverty line are Tier 1, while homes that do not meet the low-income criteria are Tier 2¹⁷⁷. Tier 2 homes receive lower reimbursements, as is shown in the chart below:

Meals Served in Day Care Homes			
	Supplement (Snack)	Lunch/Supper	Breakfast
Tier I	\$0.78	\$2.63	\$1.40
Tier II	\$0.21	\$1.59	\$0.51

Donated Foods

†† Afterschool meals and snacks are available to children through age 18, and homeless shelters may serve three meals a day to children 18 years old and younger.

The USDA also provides donated foods to supplement meal reimbursements (or cash payments in lieu of donated foods). These are not reflected in the reimbursement rates shown.

Meal Costs

As with NSLP and SBP, it is important to acknowledge that these payments do not cover the average cost of a lunch (\$3.81) or a breakfast (\$2.72).

Also important in financing CACFP are the administrative payments that are made to organizations that sponsor day care homes. The amount paid per sponsored home per month is listed below:

Administrative Payment Rates for Sponsoring Organizations of Day Care Homes (Per Month)	
First 50 day care homes	\$126 per home
Next 150 day care homes	\$96 per home
Next 800 day care homes	\$75 per home
Additional day care homes	\$66 per home

Nutrition Standards

As eating patterns and habits are established at an early age¹⁷⁸, it is important to provide children in CACFP programs with healthy, nutritious meals that promote healthy, lifelong trends. CACFP uses a meal pattern model to set nutritional requirements¹⁷⁹. The United States Department of Agriculture provides three meal patterns for children aged one to twelve years, one for breakfast, one for lunch/supper, and one for snack¹⁸⁰. A separate set of meal patterns is provided for infants (birth to eleven months).

Meals and snacks served under CACFP must meet minimum nutritional requirements set by the USDA¹⁸¹. These requirements are prescribed by the Secretary of Agriculture based on tested nutritional research and the goals of the US Dietary Guidelines, and they are reviewed every ten years¹⁸². These nutrition requirements underwent major changes because of the Healthy, Hunger-Free Kids Act in 2010, which led to new guidelines after the Institute of Medicine flagged many issues with the existing requirements. CACFP providers were required to meet these updated standards, starting in 2017. Among other improvements, these standards include a greater variety of vegetables and fruits, more whole grains, and less added sugar and saturated fat¹⁸³. As with NSLP and SBP, states have the power to enact stricter nutrition requirements.

State of Massachusetts

While the federal government provides financial support and administrative and training support, the states are responsible for direct administration of CACFP. In Massachusetts, CACFP is directly administered by the Department of Elementary and Secondary Education (DESE)¹⁸⁴, while the Department of Early Education and Care (EEC) is the licensing agency for all child care centers in the state¹⁸⁵. Federal regulations require that each state agencies must provide “sufficient consultative, technical, and managerial personnel to: (1) Administer the Program; (2) Provide sufficient training and technical assistance to institutions; (3) Monitor Program performance; (4) Facilitate expansion of the Program in low-income and rural areas; and (5) Ensure effective operation of the Program by participating institutions¹⁸⁶.” This means that, while CACFP is a federal program, Massachusetts still has a say in many aspects of how the program is marketed and run.

Federal Policy Recommendations

A major challenge that is cited with CACFP is low rates of participation. CACFP is a fantastic way to provide care and healthy food for low-income children, but there are still many who fall through the cracks. One way to increase participation in CACFP is to increase access. An important step to achieving this, especially in low-income and rural areas, would be to **reduce the area-eligibility test for Tier 1 status from 50 percent to 33 percent**. Tier I homes in low-income areas automatically receive the highest CACFP reimbursement rates, as was discussed in the *Financing Under CACFP* section. Tier I status also significantly decreases paperwork for providers, which would incentivize providers to start or continue programs. Congress should also **create a Community Eligibility Provision program for CACFP child care centers** which would allow centers to participate without income applications and enrollment forms.

In addition to the financial burden that can be associated with CACFP, there is also an administrative burden that comes with program requirements, paperwork, recordkeeping, etc., which can dissuade potential sites and sponsors from operating CACFP. The federal government should work to **streamline the program by maximizing the use of technology for paperwork and recordkeeping, authorizing a working group to guide paperwork reduction, and providing flexibility for program requirements**¹⁸⁷.

Another large challenge for CACFP providers is the financial burden associated with implementation and administration. This burden can affect the quality of programs and both providers and participants may not receive the full benefits of the program. A major change that can be implemented is to increase meal reimbursements for the program. As with NSLP and SBP, the current reimbursement rates do not correlate with the actual costs of providing meals. The federal government should **study the necessary costs for providing infant formula and raise reimbursement rates accordingly**, as the infant reimbursement rate is the same as the rate for other age groups despite formula being more expensive than other foods. Another major improvement that would benefit both providers and participants would be **increasing the number of meals or snacks that can be reimbursed each day to up to three meals and one snack**. This would align with the recommendation of numerous organizations, including the American Public Health Association, that young children eat small, healthy meals and snacks on a regular basis throughout the day for nutritional needs to be met in the best way possible¹⁸⁸.

Meals Per Day

Child care providers could receive federal funding for up to three meals and one snack until budget cuts made by Congress in 1996, a step that “harms children’s nutrition and health and weakens child care”¹⁸⁹.

State Policy Recommendations

It must be stated that recommendations will not reach their maximum efficiency if participation rates are low. In a 2013 report released by the Harvard Food Law and Policy Clinic, authors cited the “onerous program requirements and oftentimes confusing hurdles associated with enrollment” for gaps in Massachusetts CACFP participation¹⁹⁰. To increase participation rates, Massachusetts should improve access and awareness of the program. This can be done by **conducting outreach to increase the familiarity of the program** for potential providers and participants. This could be an expansion of the SBP/SFSP outreach program established by the Board of Education that works to increase awareness and participation, recruit sites, and share the complicated information and requirements in a simplified manner. A similar program is administered by the Department of Education in Connecticut¹⁹¹.

Another solution to the challenges currently associated with CACFP is to streamline the program, working to simplify or reduce recordkeeping and paperwork. Massachusetts should **conduct a working group to examine current recordkeeping and paperwork**

requirements and work with providers to streamline these processes to reduce administrative burdens, especially for low-income providers.

The second major challenge with CACFP is the burdens that sites and sponsors face and their impact on the quality of services. These challenges can be solved, or at least overcome, in a few different ways. The first solution is to increase state funding for the program. **Massachusetts should study the reimbursement rates for infant formula and increase the rates accordingly**, as the infant reimbursement rate is the same as the rate for other children despite formula being more expensive than other foods.

In addition to funding for meals, additional funding is needed for day-to-day operations for providers. Massachusetts **should provide funding to CACFP providers to cover administrative costs**, as current federal administrative reimbursements go only to sponsoring organizations. By increasing funding that providers receive, financial burdens may be alleviated and more providers who may see administrative and financial requirements as burdensome would be more likely to continue or start sites. Massachusetts should also **provide more training and support, as well as create training materials at the state level**¹⁹². The state should work with sponsors, providers, and teachers to determine what information is needed and how information should be taught. Additionally, the state should work to ensure that training materials are linguistically- and culturally-relevant.

It is important to note that the nutrition standards for CACFP, as with NSLP and SBP, are not as strong as they could be. For this reason, Massachusetts should **strengthen nutrition standards for CACFP**. This can be done in a variety of ways. Some states, such as California, West Virginia, and Texas, have made higher nutrition standards part of their licensing requirements, either for CACFP participants only or for all licensed child care facilities. Another way is through recommendations for providers. New York has created a document that includes both meal pattern requirements and recommendations¹⁹³. This works to help encourage providers to improve nutrition quality to the best of their ability.

Provider Recommendations

Firstly, it is important to acknowledge that CACFP providers are limited by various regulations, requirements, and financial challenges. This affects their ability to meet certain recommendations and the degree to which they can be implemented, especially for low-income sites, small sites, and/or rural sites. However, perhaps the most meaningful and important step CACFP providers can make is to ensure they are at least meeting the minimum nutrition standards set forth by the USDA. The aforementioned Harvard report, the authors found that due to a heavy caseload and various requirements to inspect, EEC licensors often “focus their audits on food safety and choking hazards rather than nutritional compliance¹⁹⁴.” This means that licensors are not necessarily implementing nutrition requirements. That said, to ensure participants are receiving healthy, nutritious meals, **providers should ensure these minimum nutrition standards are met**.

Additionally, if possible, providers should work to **go beyond these minimum requirements to ensure that participants are receiving appealing, healthy, and culturally-relevant meals**. As child participants may be spending eight or more hours a day in care and are reliant on providers for a majority of their nutritional needs, providers should, to the fullest extent possible, ensure these nutritional needs are met. Providers should also work to **form a relationship with parents and guardians that involves communication about nutrition to support child health at home**¹⁹⁵. This could help ensure that children are eating healthy meals outside of the program at their homes. Providers can also **consider creating partnerships** consisting of advocacy groups from the nutrition, obesity, and childcare setting, as well as providers and sponsors for CACFP program that work to support nutrition and the general administration of the program¹⁹⁶.

9. The Special Supplemental Nutrition Program for Women, Infants, and

Children (WIC)

Gender Neutral Language

While the program name specifies “women” and much of the program’s language uses terms like “women” and “mothers,” pregnant, postpartum, and breastfeeding individuals of any gender can apply for and enroll in WIC. Additionally, any parent or guardian of a child under 5 can apply for WIC for their child. To acknowledge these facts, this report will use gender neutral terminology throughout.

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is a federal program that provides benefits to purchase nutritious foods, as well as services like nutrition counseling, nutrition classes, breastfeeding support, smoking cessation support, and referrals for healthcare or social services to low-income pregnant and postpartum parents, infants, and children up to 5 years old who are at “nutritional risk”¹⁹⁷. Eligible participants may also participate in the WIC Farmers’ Market Nutrition Program, which provides benefits to buy eligible foods from farmers, farmers’ markets, or roadside stands. WIC participants must have gross household income at or below 185 percent of the federal poverty line. Applicants who already receive SNAP, Medicaid, or TANF are automatically considered income-eligible for WIC. WIC services work to promote healthy living for these low-income families that can be continued even after enrollment ends.

Benefits of WIC

In 2018, WIC provided services to approximately 6.9 million people: 1.6 million pregnant and postpartum parents, 1.7 million infants, and 3.5 million children¹⁹⁸. As a result of its services, WIC is associated with higher rates of family food security and economic security, higher availability of healthy foods in low-income communities, and improved dietary intake. WIC also improves birth outcomes and health outcomes and reduces costs associated with childbirth and healthcare. Federal nutrition programs like WIC are also crucial to support learning, cognitive development, overall health, and educational attainment and income in adulthood¹⁹⁹.

Food Insecurity in Female-Headed Households

While they do not make up all of WIC participants, it is important to note that single mothers and their children are “far more vulnerable to hunger and food insecurity,” experiencing food insecurity at a rate of 30.3%, compared to the general U.S. rate of 12.7%²⁰⁰. WIC can help ensure that these mothers and their children do not miss out on nutritious meals.

WIC is also an important program for reducing racial disparities. Racial disparities are rampant in healthcare, and the health of pregnant and postpartum parents and their children is no exception. Families of color face higher rates of parental mortality and infant mortality than white families²⁰¹. Black and Latine families face higher rates of serious pregnancy-related illnesses. Black, Indigenous, and Pacific Islander people have higher shares of preterm births, higher rates of low birthweight births, and lower rates of timely prenatal care. WIC works to reduce these disparities in the health of pregnant and postpartum parents and their children, along with disparities in food insecurity.

WIC Food Packages

WIC provides food packages to pregnant and postpartum parents, infants, and children. There is one food package for children aged 1 to 4, three food packages for pregnant and postpartum parents, and three food packages for infants^{††}.

The food packages for pregnant and postpartum parents varies depending on the parent's decision to breastfeed or formula feed. The food packages are laid out as follows:

Food Package V: for parents who are pregnant or mostly breastfeeding; lasts up to one year after child's birth

Food Package VI: for postpartum parents who are not breastfeeding; lasts up to six months after child's birth

Food Package VII: for postpartum parents who are fully breastfeeding; lasts up to one year after child's birth

The food packages for infants vary in a similar way as the food packages for pregnant and postpartum parents. Participants receive a food package based on the infant's status as breastfeeding or formula feeding and the infant's age.

History of WIC

WIC has operated in the United States for almost 50 years, beginning in 1972 as a two-year pilot aimed at improving the health of low-income pregnant and postpartum parents and their children²⁰². In 1974, the first site opened in Pineville, Kentucky and WIC went on to operate in 45 states. By 1975, the program was established permanently as a national health and nutrition program. WIC has been altered and improved over the years, including in 1978 when nutrition education, supplemental foods containing nutrients lacking in target populations, and social service referrals were introduced. More recently, in 2009, USDA introduced a new food package consistent with the Dietary Guidelines for Americans, leading to fruits, vegetables, and culturally-relevant substitutes being added to the food package. Finally, in 2010, the Healthy, Hunger-Free Kids Act mandated that all WIC state agencies adopt an electronic benefit transfer system, which replaced paper vouchers that could often lead to unnecessary stigma. While states were given the deadline of 2020 to comply with this mandate, Massachusetts implemented the change in 2014.

Funding WIC

WIC is a federal public health nutrition program that is operated through the United States Department of Agriculture. Each year, the USDA's Food and Nutrition Service drafts an annual budget proposal, which is sent to Congress. Congress determines funding and the appropriation is signed into law. From here, grants are provided to each state and administered by county and city health centers or private nonprofits²⁰³. Since 1997, Congress has provided sufficient funding to serve all eligible applicants, which totals about \$6 billion per year²⁰⁴.

One key component of WIC is the Farmers' Market Nutrition Program. This program allows eligible families to buy foods from farmers, farmers' markets, or roadside stands and is a great way to make healthy, fresh food available and affordable. In fiscal year 2020, \$18.5 million was appropriated for this program²⁰⁵. Funds are given by the Food and Nutrition Service in the form of cash grants to state agencies who then issue benefits to participants.

State of Massachusetts

In Massachusetts, the Special Supplemental Nutrition Program for Women, Infants, and Children is administered by the Department of Public Health in a manner consistent with the federal laws regarding WIC²⁰⁶. Massachusetts works to provide funding to expand program operations in areas most in need and to perform outreach activities designed to

^{††} WIC promotes breastfeeding as the optimal choice for infants unless it is inadvisable for medical reasons; however, it is important to note that what is most important is that children are fed, whether that is through breastfeeding or formula.

identify and encourage the participation of eligible individuals. Massachusetts requires a monthly food package be provided to each participant. This package is prescribed by a professional authority at the local WIC agency based on dietary needs. Each WIC agency is also required to deliver benefits to individuals based on difficulties obtaining these instruments. Guidelines for this are set forth in the state plan.

State WIC agencies engage in programs that work to increase participation, such as the targeted text message outreach, as well as improve quality, such as WIC Good Food Project²⁰⁷ and the WIC Farmers' Market Nutrition Program (FMNP)²⁰⁸. Massachusetts also allows applicants to fill out their applications online and allows participants to complete nutrition education modules online, making these processes far more accessible.

Federal Policy Recommendations

An important aspect when considering policy recommendations is the fact that WIC is not covering all eligible people. In 2018, the coverage rate was only 56.9% of eligible people, meaning many eligible people are missing out on these important services²⁰⁹. The federal government can take various measures to increase this percentage and ensure more people are receiving necessary services. The first is to **provide funding to state agencies to allow them to modernize their agencies** through attractive and effective websites, social media and web-based outreach, and online clinic meetings and services. This would help to address the accessibility of WIC services and ensure people without access to transportation, people who may work during clinic hours, or people who live far away from clinics can still access WIC services and maintain their enrollment. This is especially important for low-income people who may rely on low-wage work that often does not offer paid leave and may require working unpredictable and inflexible hours.

Another step is to remove language and cultural barriers to WIC. WIC should **ensure that outreach campaign materials, application materials, and any necessary information materials are available in a wide variety of languages and for various cultural and/or ethnic groups**. Another step that should be taken is to **adopt more gender-neutral language** in the program. This would ensure that pregnant and postpartum people who do not identify as women (such as nonbinary people and transgender men) and parents and guardians of children under 5 are aware of the services available to them and do not face unnecessarily concerns or triggers when researching and applying.

Finally, Congress should also extend the amount of time infants and children can receive food packages through WIC. Congress should **extend certification for infants to two years**, which would eliminate an unnecessary paperwork burden and encourage families to continue receiving WIC services. Additionally, while many children start kindergarten at the age of five and can begin receiving school meals, this is not the case for all children. In 2019, only 86% of 5-year-olds were enrolled in school²¹⁰. This number was even lower for people below the federal poverty line (82%) and people between 100 and 185 percent of the poverty line (84%). This means that many potentially-eligible children are missing out on necessary WIC services. A 2016 study found that there is a gap in food and nutrition programs when children turn five, leading to an increase in food insecurity for children who become age-ineligible for WIC and who have not started kindergarten²¹¹. For this reason, Congress should **extend the amount of time children are eligible for WIC until 6 years of age**.

For those who are utilizing WIC, Congress should also work to ensure that participants are receiving nutritious food. The most important step in achieving this is to **update WIC food packages to be consistent with the Institute of Medicine's recommendations**. These food packages have not been updated since 2009, and they are not consistent with recent nutrition guidelines. An additional way to help families access healthy foods is to **increase funding for the Farmers' Market Nutrition Program**. This would help people access fresh, healthy fruits and vegetables. Additionally, Congress should **increase the food package value**. This would help increase access to fruits and vegetables and allow participants to make healthier choices²¹². Finally, Congress should **provide more**

flexibility and choice for WIC shoppers to avoid unnecessary hardships and stigma. Providing more flexibility to WIC shoppers would give them the options to choose what is best for their families, encourage full redemption of WIC benefits, and reduce unnecessary stigma around the program²¹³.

State Policy Recommendations

In 2018, USDA WIC data found that Massachusetts only covered 64.4% of eligible people²¹⁴. While this is higher than the national average and higher than the 2017 rate of 60.9%, there is still room for improvement. The state can and should work to increase participation. The state should **facilitate work between WIC agencies and their state counterparts in Medicaid, SNAP, and TANF**, helping to utilize data to identify eligible people and conduct targeted outreach. This would strengthen cross-platform enrollment and increase participation rates. The state should also **ensure that WIC is added to any multi-benefit online applications or application efforts, such as the ongoing common application efforts in Massachusetts**. This would alleviate a burden for families trying to access services and potentially even help them find services they may not know are available to them.

State Agency and Local Agency Policy Recommendations

The first is to make WIC more accessible and efficient for families who may have trouble keeping up with or meeting requirements. This can be done through **assessing certification practices** through a toolkit like the one provided by the Center on Budget and Policy Priorities²¹⁵. This would allow agencies to perform tasks like facilitate enrollment, schedule appointments, simplify certification, and document eligibility. Agencies should also work to **utilize technology** to the best of their abilities through phone and video appointments, electronic document submission and review, and online appointment scheduling.

WIC agencies should also **work with state counterparts in Medicaid, SNAP, and TANF** to use their data to identify and conduct targeted outreach to eligible people. This would strengthen cross-platform enrollment and increase participation rates. **WIC services should be embedded into existing healthcare settings** to meet potential participants where they are. WIC agencies can work with employees at these healthcare settings to train and educate them on WIC qualifications, services, and applications to pass on to potentially-eligible patients.

Another step is to remove language and cultural barriers to WIC. WIC should **ensure that outreach campaign materials are available in a wide variety of languages and for various cultural and/or ethnic groups**. Another step that should be taken is to **adopt more gender-neutral language** in the program. This would ensure that pregnant and postpartum people who are not women (such as nonbinary people and transgender men) and parents and guardians of children under 5 are aware of the services available to them and do not face unnecessarily concerns or triggers when researching and applying.

10. Conclusion

As this report has shown, child nutrition programs are crucial tools in fighting childhood hunger and childhood food and nutrition insecurity. The National School Lunch Program, School Breakfast Program, Fresh Fruit and Vegetable Program, Summer Food Service Program, Afterschool Nutrition Programs, the Child and Adult Care Food Program, and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) all contribute to the health and well-being of children and their families; however, there is still work to be done to make these programs more accessible and higher quality. With over 35 million people, including almost 11 million children, living in food insecure households, we must work to combat these issues quickly and effectively.

Appendix: List of Recommendations

NSLP/SBP

Federal Policy Recommendations

Increasing Access

- **Universal Meals.** The federal government should enact a permanent universal free school meals program. If this is not done, Congress should take steps to ensure that as many children as possible are receiving free school meals, including:
 - **CEP Threshold.** Congress should reduce the CEP threshold to 25%.
 - **Expanding Free Meal Status.** Congress should expand free meal access for households at or below 300% of the federal poverty line.
- **State Pilots for CEP.** Congress should allow state pilots for CEP, allowing for statewide free meal programs for states who meet CEP requirements.
- **Direct Certification.** Congress should expand direct certification to include children receiving Medicaid and/or Supplemental Security Income benefits, children in households receiving guardianship or adoption assistance or LIHEAP, and children placed in kinship or informal care.
- **Meal Debt and Stigma.** Congress should set federal policy regarding meal debt and stigma that prohibits public identification of students with meal debt or the denial of meals to students with meal debt.

Improving Quality

- **Raise Reimbursement Rates.** Congress should provide an additional \$0.50 per breakfast and an additional \$0.15 per lunch to match the recommended reimbursement rates of the USDA School Nutrition and Meal Cost Study.
- **ISP Multiplier.** Congress should increase the Identified Student Percentage Multiplier for Community Eligibility Provision schools to 2.5.
- **Farm to School.** Congress should provide funding to expand Farm to School programs.
- **Nutrition Standards.** Congress should update nutrition standards based on recommendations from the Institute of Medicine and the U.S. Dietary Guidelines, along with other independent, objective sources.

State Policy Recommendations

Increasing Access

- **School Lunch and Breakfast Availability.** Massachusetts should require that school lunch and school breakfast be made available in every school where students are required to eat lunch at school (HI).
 - NSLP/SBP requirement?
- **Universal Meals.** Massachusetts should enact a permanent universal free school meals program (CA, ME).
 - If a permanent universal free school meal program is not enacted, Massachusetts should take steps to ensure as many students are receiving free school meals as possible. This can be achieved in a variety of ways.
 - **Requiring Participation in the Community Eligibility Provision for Eligible Schools.** Massachusetts should require eligible schools to adopt CEP. funding to match federal reimbursement to ensure 100% of school meals are funded in schools that operate CEP.
 - **Expanding Free Meal Status.** Massachusetts should expand free meal access for households at or below 300% of the federal poverty line, as has been done in Oregon.
 - **School Meal Application Streamlining.** Massachusetts should create a statewide online school meal application system that works to

alleviate application burdens for schools and parents. This system should also utilize state data for direct certification.

- **Alternative Breakfast Models.** Massachusetts should require all schools to adopt an approved delivery model that ensures all students are given an adequate opportunity to eat breakfast. These can include, but are not limited to, Grab-and-Go, Breakfast in the Classroom, Second Chance Breakfast (WV).
 - If this is not done, Massachusetts should lower the current threshold to require schools with 40% of students eligible for free or reduced-price meals in the preceding school year to implement alternative breakfast models.
- **Time to Eat.** Massachusetts should require schools to provide students at least 20 of seat time with lunch and at least 10 minutes of seat time with breakfast.
- **Lunch Scheduling.** Massachusetts should require schools to schedule recess before lunch to increase consumption of nutritious foods.

Improving Quality

- **Meal Reimbursement.** Massachusetts should provide state funds to provide an additional \$0.50 per breakfast and an additional \$0.15 per lunch to make up the difference between average cost for breakfast and lunch and the current federal reimbursement rate.
- **Farm to School.** Massachusetts should provide state funding for Farm to School programs in the state. These programs should explicitly give procurement preference to small producers and/or producers of color.
 - Massachusetts should also provide state funding to provide an additional reimbursement of \$0.10 for any child nutrition program meal that includes a locally-grown fruit, vegetable, or legume (MI).
- **Nutrition Standards.** Massachusetts should create state policies around school meal nutrition that preempt local policies and enhance nutrition standards.
 - Massachusetts should also provide state funding to provide an additional reimbursement of \$0.10 for any meal that meets optional state nutrition requirements (CT).
- **Federal Equipment Assistance Grants.** Massachusetts should provide funds for a state funding match for federal equipment assistance grants (CA).
- **Competitive Foods.** Massachusetts should require schools serving competitive foods and beverages to follow United States Dietary Guidelines, updated every five years.

Schools/School Districts Recommendations

- **Meal Provision.** Schools should provide a regular, reimbursable meal to all students, regardless of the ability to pay.
- **School Meal Application Outreach.** Schools and school districts should conduct an aggressive school meal application outreach campaign to encourage families to submit applications.
- **Scratch Cooking.** Schools should work to incorporate scratch cooking in school meal programs, as opposed to prepackaged, processed items.
- **Culturally-Relevant Meals.** Schools should work to incorporate culturally-relevant meals in school meal programs, based on the communities they serve.
- **Lunch Scheduling.** Schools should consider scheduling lunch after recess and/or after 12 p.m.
- **Time to Eat.** Schools and school districts should ensure that students have at least 20 minutes of seat time with their lunch and at least 10 minutes of seat time with their breakfast.

- **Local Partnerships.** Schools and school districts should engage in partnerships with local organizations, such as Project Bread to enhance the viability of CEP, alternative breakfast models, and more.

FFVP

Federal Policy Recommendations

- **FFVP Funding.** Congress should increase the amount of funding the program receives to ensure that the program is available to as many schools as possible and as effective as possible.
- **FFVP Expansion.** Congress should expand the Program to include middle and high schools.

Afterschool Meals

Federal Policy Recommendations

Increase Access

- **Area-Eligibility Threshold.** Congress should eliminate the area-eligibility test for NSLP and CACFP afterschool meal programs.
 - If this is not done, Congress should at least **lower the area-eligibility test** for NSLP and CACFP to allow sites with 33% or more of students eligible for free or reduced-price meals to operate a program.
- **Afterschool Program Funding.** Congress should provide funding to support and expand afterschool programs.
- **Access Grants.** Congress should provide funding for grants to increase access to meals in rural and other underserved communities.

Improve Quality

- **Reimbursement Rates.** Congress should raise reimbursement rates to match the rate of suppers served under the Summer Food Service Program (\$4.25). This would require an additional \$0.60 per meal.
- **Expand NSLP.** Congress should expand NSLP to allow schools to serve suppers through the program.
- **Streamline CACFP and SFSP.** Congress should streamline the CACFP Afterschool Supper and Snack Program and the Summer Food Service Program to allow sites to serve meals year-round through SFSP.

State Policy Recommendations

Increase Access

- **Mandated Participation.** Massachusetts should require school districts that meet the federal area-eligibility guidelines for the CACFP At-Risk Afterschool Supper Program to participate and provide meals to students who attend afterschool programming.
- **Technical Support and Outreach.** Massachusetts should provide technical support and outreach for afterschool programs through the Department of Elementary and Secondary Education.

Improve Quality

- **Expansion Grants.** Massachusetts should provide state funding to expand afterschool meal programs (OR).
- **Reimbursement Rates.** Massachusetts should raise reimbursement rates to match the rate of suppers served under the Summer Food Service Program (\$4.25). This would require an additional \$0.60 per meal.

- **Farm to School.** Massachusetts should reimburse CACFP At-Risk sponsors with an additional \$0.10 for any child nutrition program meal that includes a locally-grown fruit, vegetable, or legume (MI).

Provider Recommendations

- **Afterschool Supper.** Providers should take steps to provide an afterschool supper, rather than an afterschool snack.
- **Meal Quality.** Providers should work to ensure they are providing the most nutritious and appealing meals possible.
- **Linguistical and Cultural Relevance.** Providers should work to ensure that they are providing programming and food that is linguistically- and culturally-relevant.

Summer Meals

Federal Policy Recommendations

Increasing Access

- **Transportation Grants.** Congress should provide funding for grants for transportation to and from summer meal sites, along with mobile meal trucks.
- **Targeted Outreach and Site Recruitment.** Congress should provide funding for investments to serve low-income children, such as targeted outreach and site recruitment.
- **Meal Delivery.** Congress should allow pilots for and extensions of programs that offer summer meal delivery to central locations.
- **Area-Eligibility Threshold.** Congress should eliminate the area eligibility threshold for SFSP to allow any sites that wish to provide summer meals to do so.
 - If this is not done, the **area-eligibility threshold should at least be lowered to 33%** to match the recommended rate of the CACFP At-Risk Afterschool Meals and Snacks Program.
- **Mandated Participation.** Congress should mandate participation in school districts that meet the federal area eligibility requirements for open sites.

Improving Quality

- **Third Meal.** Congress should increase the number of reimbursable meals sites that can serve, allowing open and enrolled sites to serve a third meal.
- **Programming Funding.** Congress should increase the amount of funding allocated for summer programming.
- **Streamline SFSP and CACFP.** Congress should allow sites that operate SFSP to offer meals year-round through the program, rather than requiring application for and operation of CACFP.

Summer EBT

- **Summer EBT System.** Congress should provide funding to expand the Summer EBT program, giving families a benefit of \$60 per month per child during the summer months.

State Policy Recommendations

Increasing Access

- **Mandated Participation.** Massachusetts should mandate participation in school districts that meet the federal area eligibility requirements for open sites.
- **Summer Meals without Summer Programming.** Massachusetts should require summer meals be served in areas that meet federal area-eligibility requirements without a summer program requirement.

- **Innovation Grants.** Massachusetts should provide state funding for transportation grants and grants for mobile meal trucks and other programs that increase access for rural and under-served communities.

Improving Quality

- **Summer Programming.** Massachusetts should provide state funding for summer programming.
- **Farm to School.** Massachusetts should provide funding to reimburse SFSP sponsors with \$0.10 for any meal that includes a locally-grown fruit, vegetable, or legume.

Provider Recommendations

- **Community Partnerships and Engagement.** Providers should work to maximize their impact through engagement and partnerships with community resources and organizations, such as Project Bread.
- **Summer Programming.** Providers should attempt to provide programming at summer meal sites, if possible.
- **Linguistical and Cultural Relevance.** Providers should work to ensure that they are providing programming and food that is linguistically- and culturally-relevant.

CACFP

Federal Policy Recommendations

Increasing Access

- **Area-Eligibility.** Congress should reduce the area-eligibility test for tier 1 status from 50 percent to 40 percent.
- **Community Eligibility Provision.** Congress should create a Community Eligibility Provision program for CACFP child care centers.
- **Streamline CACFP.** Congress should streamline the program by maximizing the use of technology for paperwork and recordkeeping and working to provide flexibility and assistance for program requirements.

Improving Quality

- **Infant Formula.** The federal government should study the necessary costs for providing infant formula and raise reimbursement rates accordingly.
- **Number of Meals.** Congress should increase the number of meals or snacks that can be reimbursed each day to up to three meals and one snack per day.

State Policy Recommendations

Increasing Access

- **Outreach.** Massachusetts should conduct outreach to increase familiarity with the program for potential providers and participants.
- **Streamline CACFP.** Massachusetts should conduct a working group to examine current recordkeeping and paperwork requirements and work with providers to streamline these processes.

Improving Quality

- **Infant Formula.** Massachusetts should study the reimbursement rates for infant formula and increase the rates accordingly.
- **Administrative Costs.** Massachusetts should provide state funding to CACFP providers to cover administrative costs.
- **Training and Support.** Massachusetts should provide more training and support for CACFP providers, as well as create training materials at the state level.
- **Nutrition Standards.** Massachusetts should strengthen nutrition standards for CACFP and make these standards part of licensing requirements (CA, WV, TX).

Provider Recommendations

- **Nutrition Standards.** Providers should ensure that minimum nutrition standards are met. When possible, providers should work to go beyond these minimum requirements to ensure that participants are receiving appealing, healthy, and culturally-relevant meals.
- **Parent and Guardian Relationships.** Providers should work to form relationships with parents and guardians of participants that involves communication about nutrition to support child health at home.
- **Community Partnerships.** Providers should consider partnerships consisting of advocacy groups from the nutrition, obesity, and childcare setting, as well as providers and sponsors for CACFP program that work to support nutrition and the general administration of the program.

WIC

Federal Policy Recommendations

- **Modernization.** Congress should provide funding to agencies to allow them to modernize their agencies through attractive and effective websites, social media and web-based outreach, and online clinic meetings and services.
- **Linguistic and Cultural Barriers.** WIC should ensure that outreach campaign materials, application materials, and any necessary information materials are available in a wide variety of languages and for various cultural and/or ethnic groups.
- **Gender-Neutral Language.** WIC should work to make the language of the program more gender-neutral to ensure that pregnant and postpartum people who do not identify as women are still aware of the services available to them.
- **Infant Certification.** Congress should extend certification for infants to two years.
- **Child Age-Eligibility.** Congress should extend the amount of time children are eligible for WIC until 6 years of age.
- **Nutrition Standards.** Congress should update WIC food packages to be consistent with the Institute of Medicine's recommendations.
- **Farmers' Market Nutrition Program (FMNP).** Congress should increase funding for the Farmers' Market Nutrition Program.
- **Food Package Value.** Congress should increase the food package value to reflect the cost of healthy eating.
- **WIC Shopper Flexibility.** Congress should provide more flexibility and choice for WIC shoppers to avoid unnecessary hardships and stigma.

State Policy Recommendations

- **Cross-Platform Engagement.** Massachusetts should facilitate engagement between WIC agencies and their state counterparts in Medicaid, SNAP, and TANF to help identify eligible people and conduct targeted outreach.
- **Modernization.** Massachusetts should provide funding to agencies to allow them to modernize their agencies through attractive and effective websites, social media and web-based outreach, and online clinic meetings and services.
- **Multi-Benefit Online Applications.** Massachusetts should ensure that WIC is included in any multi-benefit online application system.

State and Local Agencies Recommendations

- **Certification Practices.** WIC agencies should assess certification practices through a toolkit such as the one provided by the Center on Budget and Policy Priorities.
- **Technology.** Agencies should utilize technology to the best of their abilities through phone and video appointments, electronic document submission and review, and online appointment scheduling.

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- **Cross-Platform Engagement.** WIC agencies should work with state counterparts in Medicaid, SNAP, and TANF, using their data to identify and conduct targeted outreach to eligible people.
 - **Existing Healthcare Settings.** WIC agencies should work to embed WIC services into existing healthcare settings to meet potential participants where they are.
 - **Linguistic and Cultural Barriers.** WIC should ensure that outreach campaign materials, application materials, and any necessary information materials are available in a wide variety of languages and for various cultural and/or ethnic groups.
 - **Gender-Neutral Language.** WIC should work to make the language of the program more gender-neutral to ensure that pregnant and postpartum people who do not identify as women are still aware of the services available to them.

Endnotes

- ¹ Feeding America. (2021). *The Impact of the Coronavirus on Food Insecurity in 2020 and 2021*. Feeding America.
- ² United States Census Bureau. (2020). *2020 Massachusetts State and County Poverty Statistics*. Retrieved from United States Census Bureau: <https://www2.census.gov/programs-surveys/saipe/datasets/2020/2020-state-and-county/est20-ma.txt>
- ³ Feeding America. (2019). *Food Insecurity in Massachusetts*. Retrieved from Feeding America: <https://map.feedingamerica.org/county/2019/overall/massachusetts>
- ⁴ United States Census Bureau. (2022, January 4). *Household Pulse Survey Public Use File*. Retrieved from United States Census Bureau: <https://www.census.gov/programs-surveys/household-pulse-survey/datasets.html>
- ⁵ Gamblin, M., & King, K. (2021). *Racially Equitable Responses to Hunger During COVID-19 and Beyond*. Bread for the World.
- ⁶ Project Bread. (2021, September 22). *Why Do Recent Headlines Say “No Increase in Food Insecurity in 2020”?* . Retrieved from Project Bread: <https://www.projectbread.org/blog/why-do-recent-headlines-say-no-increase-in-food-insecurity-in-2020>
- ⁷ Ibid.
- ⁸ Feeding America. (n.d.). *Importance of Nutrition on Health in America*. Retrieved from Feeding America: <https://www.feedingamerica.org/hunger-in-america/impact-of-hunger/hunger-and-nutrition>
- ⁹ Feeding America. (n.d.). *Facts about child hunger in America*. Retrieved from Feeding America: <https://www.feedingamerica.org/hunger-in-america/child-hunger-facts>
- ¹⁰ St. Clarke, T. (2018). The Effects of Food Security on Socioeconomic Mobility in the United States: A Case Study in Allendale County, South Carolina. *Senior Theses*.
- ¹¹ Gamblin, M. (2021). *Applying Racial Equity to U.S. Federal Nutrition Assistance Programs: SNAP, WIC and Child Nutrition*. Bread for the World Institute.
- ¹² United States Census Bureau. (2021, August 11). *Household Pulse Survey Shows LGBT Adults More Likely to Report Living in Households With Food and Economic Insecurity Than Non-LGBT Respondents*. Retrieved from United States Census Bureau: <https://www.census.gov/library/stories/2021/08/lgbt-community-harder-hit-by-economic-impact-of-pandemic.html>
- ¹³ Park, J. E., Kim, S. Y., Kim, S. H., Jeoung, E. J., & Park, J. H. (2020). Household Food Insecurity: Comparison between Families with and without Members with Disabilities. *International Journal of Environmental Research and Public Health*, 17(17).
- ¹⁴ Patterson, J., Russomanno, J., Teferra, A., & Jabson Tree, J. (2020). Disparities in food insecurity at the intersection of race and sexual orientation: A population-based study of adult women in the United States. *SSM - Population Health*, 12.
- ¹⁵ Feeding America. (n.d.). *The National School Lunch Program (NSLP)*. Retrieved from Feeding America: <https://www.feedingamerica.org/take-action/advocate/federal-hunger-relief-programs/national-school-lunch-program>
- ¹⁶ Food Research and Action Center. (n.d.). *Benefits of School Lunch*. Retrieved from Food Research and Action Center: <https://frac.org/programs/national-school-lunch-program/benefits-school-lunch>

-
- ¹⁷ Food Research and Action Center. (n.d.). *Benefits of School Breakfast*. Retrieved from Food Research and Action Center: <https://frac.org/programs/school-breakfast-program/benefits-school-breakfast>
- ¹⁸ Liu, J., Micha, R., Li, Y., & Mozaffarian, D. (2021). Trends in Food Sources and Diet Quality Among US Children and Adults, 2003-2018. *JAMA Network open*, 4(4).
- ¹⁹ Food and Nutrition Service. (2021). *Lunches Consumed from School are the Most Nutritious*. United States Department of Agriculture.
- ²⁰ Project Bread. (2021, September 22). *Why Do Recent Headlines Say “No Increase in Food Insecurity in 2020”?* . Retrieved from Project Bread: <https://www.projectbread.org/blog/why-do-recent-headlines-say-no-increase-in-food-insecurity-in-2020>
- ²¹ Stanger-McLaughlin, T., Martini, S., Henchy, G., Jacobs, K., Parker, E., & Segrest, V. (2021). *Reimagining Hunger Responses in Times of Crisis: Insights from Case Examples and a Survey of Native Communities’ Food Access During COVID-19*. Food Research and Action Center.
- ²² Liu, J., Micha, R., Li, Y., & Mozaffarian, D. (2021). Trends in Food Sources and Diet Quality Among US Children and Adults, 2003-2018. *JAMA Network open*, 4(4).
- ²³ The Rockefeller Foundation. (2021). *True Cost of Food: School Meals Case Study*. The Rockefeller Foundation.
- ²⁴ Sowa, A. (2021, August 27). *Universal Meals Are Essential for Advancing Racial Equity*. Retrieved from Children's Defense Fund: <https://www.childrensdefense.org/blog/universal-meals-are-essential-for-advancing-racial-equity/>
- ²⁵ Bread for the World Institute. (n.d.). *Recommendations to Promote Racial Equity within Child Nutrition Programs*. Bread for the World Institute.
- ²⁶ Held, L. (2021, January 26). *The Pandemic Reveals Racial Gaps in School Meal Access* . Retrieved from Civil Eats: <https://civileats.com/2021/01/26/did-pandemic-disruptions-to-school-meal-programs-leave-out-students-of-color/>
- ²⁷ National Farm to School Network. (n.d.). *Advancing Racial and Social Equity*. Retrieved from National Farm to School Network: <https://www.farmtoschool.org/about/equity>
- ²⁸ Ralston, K., Newman, C., Clauson, A., Guthrie, J., & Buzby, J. (2008). *The National School Lunch Program: Background, Trends, and Issues*. United States Department of Agriculture.
- ²⁹ Food Research and Action Center. (2016). *Facts: National School Lunch Program*. <https://frac.org/wp-content/uploads/cnslp.pdf>.
- ³⁰ School Nutrition Association. (n.d.). *School Meal Trends and Stats*. Retrieved from School Nutrition Association: <https://schoolnutrition.org/aboutschoolmeals/schoolmealtrendsstats/>
- ³¹ Ibid.
- ³² United States Department of Agriculture. (n.d.). *National School Lunch Program*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/nslp>
- ³³ Harris, M. (2018, September 15). *The History of School Lunches*. Retrieved from Pacific Standard: <https://psmag.com/magazine/the-history-of-school-lunches>
- ³⁴ Rude, E. (2016, September 19). *An Abbreviated History of School Lunch in America* . Retrieved from Time: <https://time.com/4496771/school-lunch-history/>

-
- ³⁵ Food and Nutrition Service. (2013, July 24). *School Breakfast Program History*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/sbp/program-history>
- ³⁶ Ibid.
- ³⁷ Blakemore, E. (2021, January 29). *How the Black Panthers' Breakfast Program Both Inspired and Threatened the Government*. Retrieved from History: <https://www.history.com/news/free-school-breakfast-black-panther-party>
- ³⁸ Milkman, A. (2016, February 16). *The Radical Origins of Free Breakfast for Children*. Retrieved from Eater: <https://www.eater.com/2016/2/16/11002842/free-breakfast-schools-black-panthers>
- ³⁹ Food and Nutrition Service. (2013, November 20). *Healthy Hunger-Free Kids Act*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/cn/healthy-hunger-free-kids-act>
- ⁴⁰ Food and Nutrition Service. (2014, May 20). *FACT SHEET: Healthy, Hunger-Free Kids Act School Meals Implementation*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/pressrelease/2014/009814>
- ⁴¹ Ibid.
- ⁴² Kenney, E., Barrett, J., Bleich, S., Ward, Z., Craddock, A., & Gortmaker, S. (2020). Impact Of The Healthy, Hunger-Free Kids Act On Obesity Trends. *Health Affairs*, 39(7), 1122-1129. Retrieved from <https://www.healthaffairs.org/doi/10.1377/hlthaff.2020.00133>
- ⁴³ School Nutrition Association. (2021). *Back to School 2021 Report: A Summary of Survey Results*. School Nutrition Association.
- ⁴⁴ No Kid Hungry. (n.d.). *What is CEP?* Retrieved from No Kid Hungry: <http://bestpractices.nokidhungry.org/programs/community-eligibility-provision/what-is-cep>
- ⁴⁵ School Nutrition Association. (n.d.). *School Meal Trends and Stats*. Retrieved from School Nutrition Association: <https://schoolnutrition.org/aboutschoolmeals/schoolmealtrendsstats/>
- ⁴⁶ Food and Nutrition Service. (2021). *School Nutrition and Meal Cost Study*. United States Department of Agriculture.
- ⁴⁷ Ibid.
- ⁴⁸ Food Research and Action Center. (n.d.). *Community Eligibility*. Retrieved from Food Research and Action Center: <https://frac.org/community-eligibility>
- ⁴⁹ Food and Nutrition Service. (2002, August 14). *Provision 2 Guidance National School Lunch and School Breakfast Programs*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/cn/provision-2-guidance-national-school-lunch-and-school-breakfast-programs>
- ⁵⁰ Food and Nutrition Service. (2012). *Nutrition Standards in the National School Lunch and School Breakfast Programs*. United States Department of Agriculture.
- ⁵¹ Ibid.
- ⁵² Center for Science in the Public Interest. (2020). *10-Year Anniversary of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)*. Center for Science in the Public Interest.
- ⁵³ Food and Nutrition Service. (n.d.). *Smart Snacks in School*. United States Department of Agriculture.
- ⁵⁴ Centers for Disease Control and Prevention. (2012). *Competitive Foods and Beverages in U.S. Schools: A State Policy Analysis*. U.S. Department of Health and Human Services.

-
- ⁵⁵ Gaddis, J. (2020, September 21). *The big business of school meals*. Retrieved from Phi Delta Kappan: <https://kappanonline.org/big-business-school-meals-food-service-gaddis/>
- ⁵⁶ Harris, M. (2018, September 15). *The History of School Lunches*. Retrieved from Pacific Standard: <https://psmag.com/magazine/the-history-of-school-lunches>
- ⁵⁷ An Act to Authorize Cities and Towns to Provide Free Meals for School Children. 1913 Mass. Acts 575. 2 May 1913.
- ⁵⁸ An Act Authorizing the Boston School Committee to Provide Free Lunches for Certain Undernourished and Needy Pupils. 1943 Mass. Acts 256. 10 May 1943.
- ⁵⁹ An Act Requiring That School Food Services Be Made Available in All Public Schools in The Commonwealth and Providing for Free Lunch to Children. 1970 Mass. Acts 871. 1 September 1970.
- ⁶⁰ Mass. Gen. Laws Ch. 69, § 1C. An Act Promoting Student Nutrition. 2021 Mass. Acts 62. 14 October 2021.
- ⁶¹ Mass. Gen. Laws Ch. 15, § 1G. An Act Establishing School Based Nutrition and Childhood Hunger Relief Programs. 1992 Mass. Acts 414. 14 January 1993.
- ⁶² Mass. Gen. Laws Ch. 71, § 72A. An Act Promoting Student Nutrition. 2021 Mass. Acts 62. 14 October 2021.
- ⁶³ Mass. Gen. Laws Ch. 71, § 72B. An Act Promoting Student Nutrition. 2021 Mass. Acts 62. 14 October 2021.
- ⁶⁴ Mass. Gen. Laws Ch. 69, § 1C. An Act Regarding Breakfast After the Bell. 2020 Mass. Acts 133. 4 August 2020.
- ⁶⁵ Commissioner Mitchell D. Chester. (2015, February 12). *Policy Guidance on "Breakfast in the Classroom" and Student Learning Time Requirements*. Retrieved from Massachusetts Department of Elementary and Secondary Education: <https://www.doe.mass.edu/news/news.aspx?id=16759>
- ⁶⁶ Director Robert M. Leshin. (2022, January 15). School Nutrition Programs Reimbursement Rates for School Year 2021-2022 January 2022 Update. Massachusetts Department of Elementary and Secondary Education. Retrieved from Massachusetts Department of Elementary and Secondary Education.
- ⁶⁷ Child Nutrition Outreach Program. (n.d.). *Reimbursement Regulations*. Retrieved from Child Nutrition Outreach Program: <https://www.meals4kids.org/reimbursement-regulations>
- ⁶⁸ Massachusetts Department of Elementary and Secondary Education. (2022, January 26). *Grants and Other Financial Assistance Programs*. Retrieved from Massachusetts Department of Elementary and Secondary Education: <https://www.doe.mass.edu/grants/default.html>
- ⁶⁹ Project Bread. (n.d.). *Community Nutrition Services*. Retrieved from Project Bread: <https://www.projectbread.org/chefs-in-schools-program>
- ⁷⁰ Mass. Gen. Laws Ch. 69, § 1C. An Act Requiring That School Food Services Be Made Available in All Public Schools in the Commonwealth and Providing for Free Lunch to Children. 1970 Mass. Acts 871. 1 September 1970.
- ⁷¹ Mass. Gen. Laws Ch. 111, § 223. An Act Relative to School Nutrition. 2010 Mass. Acts 197. 30 July 2010.
- ⁷² Department of Public Health. (2012). *Nutrition Standards for Competitive Foods and Beverages in Public Schools*. Department of Public Health.
- ⁷³ Ingram, N. (2021, October 18). *Districts Want to Make School Meals Free Forever. But They Need Help Paying for It*. Retrieved from EdSurge:

<https://www.edsurge.com/news/2021-10-18-districts-want-to-make-school-meals-free-forever-but-they-need-help-paying-for-it>

- ⁷⁴ Karlamangla, S. (2021, November 4). *What to Know About California's Free School Lunch Program*. Retrieved from The New York Times: <https://www.nytimes.com/2021/10/01/us/california-free-lunch.html>
- ⁷⁵ Ibid.
- ⁷⁶ Amin, R. (2019, October 15). *Universal free lunch is linked to better test scores in New York City, new report finds*. Retrieved from Chalkbeat New York: <https://ny.chalkbeat.org/2019/10/15/21121847/universal-free-lunch-is-linked-to-better-test-scores-in-new-york-city-new-report-finds>
- ⁷⁷ Gutierrez, E. (2021). The Effect of Universal Free Meals on Student Perceptions of School Climate: Evidence from New York City. *EdWorkingPaper*, 21(430).
- ⁷⁸ Ibid.
- ⁷⁹ Karlamangla, S. (2021, November 4). *What to Know About California's Free School Lunch Program*. Retrieved from The New York Times: <https://www.nytimes.com/2021/10/01/us/california-free-lunch.html>
- ⁸⁰ No Kid Hungry. (n.d.). *Universal Free School Meals: Comparing Funding Options to Create Hunger-Free Schools*. Retrieved from No Kid Hungry: https://bestpractices.nokidhungry.org/sites/default/files/providing-universal-free-school-meals_0.pdf
- ⁸¹ Centers for Disease Control and Prevention. (2011). *School Health Guidelines to Promote Healthy Eating and Physical Activity*. U.S. Department of Health and Human Services.
- ⁸² School Nutrition Association. (2019). *Urge USDA and the US Department of Education, in collaboration with School Food Authorities (SFAs), to develop best practices and guidance to ensure school schedules provide students adequate time to eat healthy school meals*. School Nutrition Association.
- ⁸³ Food and Nutrition Service. (2021). *School Nutrition and Meal Cost Study*. United States Department of Agriculture.
- ⁸⁴ Food Research and Action Center. (2021). *School Breakfast Scorecard*. Food Research and Action Center.
- ⁸⁵ Haw. Code R. § 8-37-2
- ⁸⁶ Centers for Disease Control and Prevention. (2011). *School Health Guidelines to Promote Healthy Eating and Physical Activity*. U.S. Department of Health and Human Services.
- ⁸⁷ School Nutrition Association. (2019). *Urge USDA and the US Department of Education, in collaboration with School Food Authorities (SFAs), to develop best practices and guidance to ensure school schedules provide students adequate time to eat healthy school meals*. School Nutrition Association.
- ⁸⁸ Ingram, N. (2021, October 18). *Districts Want to Make School Meals Free Forever. But They Need Help Paying for It*. Retrieved from EdSurge: <https://www.edsurge.com/news/2021-10-18-districts-want-to-make-school-meals-free-forever-but-they-need-help-paying-for-it>
- ⁸⁹ Gutierrez, E. (2021). The Effect of Universal Free Meals on Student Perceptions of School Climate: Evidence from New York City. *EdWorkingPaper*, 21(430).
- ⁹⁰ Karlamangla, S. (2021, November 4). *What to Know About California's Free School Lunch Program*. Retrieved from The New York Times: <https://www.nytimes.com/2021/10/01/us/california-free-lunch.html>

-
- ⁹¹ Ibid.
- ⁹² Amin, R. (2019, October 15). *Universal free lunch is linked to better test scores in New York City, new report finds*. Retrieved from Chalkbeat New York: <https://ny.chalkbeat.org/2019/10/15/21121847/universal-free-lunch-is-linked-to-better-test-scores-in-new-york-city-new-report-finds>
- ⁹³ Food and Nutrition Service. (2018). *Direct Certification in the National School Lunch Program: State Implementation Progress Report to Congress - School Year 2015-2016 & School Year 2016-2017*. United States Department of Agriculture.
- ⁹⁴ West Virginia Feed to Achieve Act. W. Va. Code § 18-5D-3 (2020)
- ⁹⁵ Food and Nutrition Service. (2021). *School Nutrition and Meal Cost Study*. United States Department of Agriculture.
- ⁹⁶ National Farm to School Network. (n.d.). *Advancing Racial and Social Equity*. Retrieved from National Farm to School Network: <https://www.farmtoschool.org/about/equity>
- ⁹⁷ Massachusetts Farm to School. (2021). *Farm to School in Every Community*. Massachusetts Farm to School.
- ⁹⁸ State School Aid Act of 1979. Mich. Comp. Laws 388.1631j (1979).
- ⁹⁹ Cal. Ed. Code, Section 49571
- ¹⁰⁰ Food and Nutrition Service. (2021, June 1). *FY 2021 NSLP Equipment Assistance Grants for School Food Authorities*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/grant/fy-2021-nslp-equipment-assistance-grants-school-food-authorities>
- ¹⁰¹ North, A. (2021, February 17). *How school funding can help repair the legacy of segregation*. Retrieved from Vox: <https://www.vox.com/22266219/biden-education-school-funding-segregation-antiracist-policy>
- ¹⁰² Conn. Gen. Stat. § 10-215b.
- ¹⁰³ Food Research and Action Center. (2018). *Best Practices for Preventing or Reducing School Meal Debt*. Food Research and Action Center.
- ¹⁰⁴ The Lunch Box. (n.d.). *What is Scratch Cooking?* Retrieved from The Lunch Box: <https://www.thelunchbox.org/recipes-menus/what-is-scratch-cooking>
- ¹⁰⁵ Milch, A., & Gaines, A. (2019, June 12). *The Culture of Cambridge: Successfully Incorporating Culturally Appropriate School Meals*. Retrieved from Healthy Food Choices in Schools: <https://healthy-food-choices-in-schools.extension.org/the-culture-of-cambridge-successfully-incorporating-culturally-appropriate-school-meals/>
- ¹⁰⁶ Centers for Disease Control and Prevention. (2011). *School Health Guidelines to Promote Healthy Eating and Physical Activity*. U.S. Department of Health and Human Services.
- ¹⁰⁷ Ibid.
- ¹⁰⁸ Food and Nutrition Service. (2017, December 1). *Fresh Fruit and Vegetable Program (FFVP) Fact Sheet*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/ffvp/ffvp-fact-sheet>
- ¹⁰⁹ Food and Nutrition Service. (2005). *Promoting Fruits and Vegetables in Schools: Wellness Policy Opportunities*. United States Department of Agriculture. Retrieved from United States Department of Agriculture.
- ¹¹⁰ Food and Nutrition Service. (n.d.). *Fresh Fruit and Vegetable Program*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/ffvp/fresh-fruit-and-vegetable-program>

-
- ¹¹¹ Bartlett, S., Olsho, L., Klerman, J., Patlan, K. L., Blocklin, M., Connor, P., . . . Crawford, P. (2013). *Evaluation of the Fresh Fruit and Vegetable Program (FFVP) Executive Summary*. United States Department of Agriculture.
- ¹¹² Ibid.
- ¹¹³ United Health Foundation. (2021). *Fruit and Vegetable Consumption*. Retrieved from America's Health Rankings:
<https://www.americashealthrankings.org/explore/annual/measure/fvcombo/state/ALL>
- ¹¹⁴ Food and Nutrition Service. (2013, September 12). *Fresh Fruit and Vegetable Program: Program History*. Retrieved from United States Department of Agriculture:
<https://www.fns.usda.gov/ffvp/program-history>
- ¹¹⁵ Food and Nutrition Service. (2020, August 18). *Fresh Fruit and Vegetable Program Allocation of Funds for FY 2021*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/ffvp/allocation-funds-fy-2021>
- ¹¹⁶ Ibid.
- ¹¹⁷ No Kid Hungry. (2020). *Food Insecurity Among Middle & High School Students in Maryland*. No Kid Hungry.
- ¹¹⁸ Food Research and Action Center. (2019). *Facts: The Afterschool Meal Program*. Food Research and Action Center.
- ¹¹⁹ Ibid.
- ¹²⁰ Food Research and Action Center. (2020). *Afterschool Suppers: A Snapshot of Participation*. Food Research and Action Center.
- ¹²¹ Food Research and Action Center. (2021). *2021 Afterschool Nutrition Report*. Food Research and Action Center.
- ¹²² Food Research and Action Center. (2016). *The Afterschool Meal Program: Serve Meals on Weekends, School Holidays, and School Breaks*. Food Research and Action Center.
- ¹²³ youth.gov. (n.d.). *Benefits for Youth, Families, and Communities*. youth.gov.
- ¹²⁴ Council for a Strong America. (2018, April 30). *The Prime Time for Juvenile Crime Needs Afterschool*. Retrieved from Council for a Strong America:
<https://www.strongnation.org/articles/637-the-prime-time-for-juvenile-crime-needs-afterschool>
- ¹²⁵ Ibid.
- ¹²⁶ Knop, B. (2017, November 21). *Parents Burning the Midnight (and Weekend) Oil*. Retrieved from United States Census Bureau:
https://www.census.gov/newsroom/blogs/random-samplings/2017/11/parents_burning_the.html
- ¹²⁷ No Kid Hungry. (2017). *To Meet Need, Growth in Afterschool Snacks and Meals Must Continue A Report on History and Trends: FY 2017 Update*. No Kid Hungry. Retrieved from No Kid Hungry:
http://bestpractices.nokidhungry.org/sites/default/files/to-meet-need-growth-in-afterschool-snacks-and-meals-must-continue-a-report-on-history-and-trends---2017-update_0.pdf
- ¹²⁸ Food Research and Action Center. (2020). *A History of the Afterschool Nutrition Programs*. Food Research and Action Center.
- ¹²⁹ Ibid.
- ¹³⁰ No Kid Hungry. (2017). *To Meet Need, Growth in Afterschool Snacks and Meals Must Continue A Report on History and Trends: FY 2017 Update*. No Kid Hungry. Retrieved from No Kid Hungry:

http://bestpractices.nokidhungry.org/sites/default/files/to-meet-need-growth-in-afterschool-snacks-and-meals-must-continue-a-report-on-history-and-trends---2017-update_0.pdf

- ¹³¹ Economic Research Service. (2021, September 7). *After-School Snacks and Meals*. Retrieved from United States Department of Agriculture: <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/after-school-snacks-and-meals/>
- ¹³² No Kid Hungry. (n.d.). *About Afterschool Meals*. Retrieved from No Kid Hungry: <http://bestpractices.nokidhungry.org/programs/afterschool-meals/about-afterschool-meals>
- ¹³³ Food and Nutrition Service. (2021). *Child and Adult Care Food Program: National Average Payment Rates, Day Care Home Food Service Payment Rates, and Administrative Reimbursement Rates for Sponsoring Organizations of Day Care Homes for the Period July 1, 2021 Through June 30, 2022*. United States Department of Agriculture.
- ¹³⁴ Food and Nutrition Service. (2013, July 16). *Nutrition Standards for CACFP Meals and Snacks*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/cacfp/meals-and-snacks>
- ¹³⁵ Food Research and Action Center. (2017, September 28). *New USDA Rules for Meals and Snacks in the Child and Adult Care Food Program Promote Healthy Eating Habits*. Retrieved from Food Research and Action Center: <https://frac.org/news/frac-statement-new-usda-rules-meals-snacks-child-adult-care-food-program-promote-healthy-eating-habits>
- ¹³⁶ Food and Nutrition Service. (2013, November 12). *NSLP Afterschool Snack Service - FAQs*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/cn/afterschool-snacks-faqs>
- ¹³⁷ Massachusetts Department of Elementary and Secondary Education. (2021, October 31). *Child and Adult Care Food Program*. Retrieved from Massachusetts Department of Elementary and Secondary Education: <https://www.doe.mass.edu/cnp/nprograms/cacfp.html>
- ¹³⁸ Afterschool Alliance. (2020). *America After 3PM: Demand Grows, Opportunity Shrinks*. Afterschool Alliance.
- ¹³⁹ Food Research and Action Center. (2021). *2021 Afterschool Nutrition Report*. Food Research and Action Center.
- ¹⁴⁰ Ibid.
- ¹⁴¹ 20-A M.R.S. §6602, sub-§1D (2021)
- ¹⁴² Or. Rev. Stat. § 327.297
- ¹⁴³ Food Research and Action Center. (2016). *The Afterschool Meal Program: Serve Meals on Weekends, School Holidays, and School Breaks*. Food Research and Action Center.
- ¹⁴⁴ Food Research and Action Center. (2020). *Hunger Doesn't Take a Vacation: Summer Nutrition Status Report*. Food Research and Action Center.
- ¹⁴⁵ Afterschool Alliance. (2021). *Spiking Demand, Growing Barriers: The Trends Shaping Afterschool and Summer Learning in Rural Communities*. Afterschool Alliance. Retrieved from Afterschool Alliance: <http://www.afterschoolalliance.org/AA3PM/>
- ¹⁴⁶ Quinn, D., & Polikoff, M. (2017, September 14). *Summer learning loss: What is it, and what can we do about it?* Retrieved from Brookings:

<https://www.brookings.edu/research/summer-learning-loss-what-is-it-and-what-can-we-do-about-it/>

¹⁴⁷ Ibid.

¹⁴⁸ Food and Nutrition Service. (2019, March 31). *Summer Food Service Program History*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/sfsp/program-history>

¹⁴⁹ Ibid.

¹⁵⁰ Ibid.

¹⁵¹ Pub. L. 108-265

¹⁵² 7 CFR 225.2

¹⁵³ 7 CFR 225.16(d)

¹⁵⁴ 7 CFR 210.10

¹⁵⁵ Rhode Island Department of Education. (n.d.). *Site Supervisor's Guide: Meal Pattern Requirements*. Rhode Island Department of Education.

¹⁵⁶ Massachusetts Department of Elementary and Secondary Education. (2021). *FY2021: Summer Food Service Program: Expansion, Access, Training and Start-Up (SFSP EATS) Grant for New and Existing Sponsors*. Retrieved from Massachusetts Department of Elementary and Secondary Education: <https://www.doe.mass.edu/grants/2021/542/>

¹⁵⁷ Mass. Gen. Laws Ch. 15, § 1G. An Act Establishing School Based Nutrition and Childhood Hunger Relief Programs. 1992 Mass. Acts 414. 14 January 1993.

¹⁵⁸ Food Research and Action Center. (2020). *Hunger Doesn't Take a Vacation: Summer Nutrition Status Report*. Food Research and Action Center.

¹⁵⁹ Afterschool Alliance. (2021). *Spiking Demand, Growing Barriers: The Trends Shaping Afterschool and Summer Learning in Rural Communities*. Afterschool Alliance. Retrieved from Afterschool Alliance: <http://www.afterschoolalliance.org/AA3PM/>

¹⁶⁰ Food and Nutrition Service. (2016). *Summer Electronic Benefit Transfer for Children (SEBTC) Demonstration: Summary Report*. United States Department of Agriculture.

¹⁶¹ MD Human Svs. Code § 5-501.1 (2019)

¹⁶² Food Research and Action Center. (2020). *Hunger Doesn't Take a Vacation: Summer Nutrition Status Report*. Food Research and Action Center.

¹⁶³ Ibid.

¹⁶⁴ 105 ILCS 126/20

¹⁶⁵ 4 TX Admin. Code § 25.601

¹⁶⁶ Food Research and Action Center. (2021). *CACFP During COVID-19: A Key Support for Families Despite Losses Due to the Pandemic*. Food Research and Action Center.

¹⁶⁷ Thomas, M., Miller, D., & Morrissey, T. (2019). Food Insecurity and Child Health. *Pediatrics*, 144(4).

¹⁶⁸ Center for the Study of Social Policy. (2018). *Food Insecurity in Early Childhood*. Center for the Study of Social Policy.

¹⁶⁹ Ibid.

¹⁷⁰ Itoyama, S., & Wroblewski, L. (2013). *The Child and Adult Care Food Program in Massachusetts*. Harvard Food Law and Policy Clinic.

¹⁷¹ Food Research and Action Center. (n.d.). *Child and Adult Care Food Program (CACFP)*. Retrieved from Food Research and Action Center: <https://frac.org/programs/child-adult-care-food-program>

-
- ¹⁷² Henchy, G. (2018, December 19). *Remember This December: Hunger is Solvable With CACFP*. Retrieved from Food Research and Action Center:
<https://frac.org/blog/remember-this-december-hunger-is-solvable-with-cacfp>
- ¹⁷³ Ibid.
- ¹⁷⁴ Pew Research Center. (2015, November 2). *In Nearly Half of Two-Parent Households, Both Mom and Dad Work Full-Time*. Retrieved from Pew Research Center:
https://www.pewresearch.org/social-trends/2015/11/04/raising-kids-and-running-a-household-how-working-parents-share-the-load/st_2015-11-04_working-parents-01/
- ¹⁷⁵ Food and Nutrition Service. (n.d.). *Child and Adult Care Food Program*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/cacfp>
- ¹⁷⁶ 42 U.S. Code § 1766
- ¹⁷⁷ Hamilton, W., Burstein, N., & Crepinsek, M. K. (2002). *Reimbursement Tiering in the CACFP: Summary Report to Congress on the Family Child Care Homes Legislative Changes Study*. United States Department of Agriculture.
- ¹⁷⁸ Saint Louis, C. (2014, September 2). *Childhood Diet Habits Set in Infancy, Studies Suggest*. Retrieved from The New York Times:
<https://www.nytimes.com/2014/09/02/health/childhood-diet-habits-set-in-infancy-studies-suggest.html>
- ¹⁷⁹ 7 CFR § 226.20 (1-1-11 Edition)
- ¹⁸⁰ Ibid.
- ¹⁸¹ 42 U.S. Code § 1766
- ¹⁸² Ibid.
- ¹⁸³ Massachusetts Department of Elementary and Secondary Education. (2021, October 31). *Child and Adult Care Food Program*. Retrieved from Massachusetts Department of Elementary and Secondary Education:
<https://www.doe.mass.edu/cnp/nprograms/cacfp.html>
- ¹⁸⁴ Mass.gov. (n.d.). *Child Care Program Licensing*. Retrieved from Mass.gov:
<https://www.mass.gov/child-care-program-licensing>
- ¹⁸⁵ 7 CFR § 226.6
- ¹⁸⁶ Ibid.
- ¹⁸⁷ Food Research and Action Center. (2019). *Priorities to Improve and Strengthen Child Nutrition Programs*. Food Research and Action Center.
- ¹⁸⁸ Ibid.
- ¹⁸⁹ Ibid.
- ¹⁹⁰ Itoyama, S., & Wroblewski, L. (2013). *The Child and Adult Care Food Program in Massachusetts*. Harvard Food Law and Policy Clinic.
- ¹⁹¹ Conn. Gen. Stat. § 10-215h.
- ¹⁹² Food Research and Action Center. (2019). *Priorities to Improve and Strengthen Child Nutrition Programs*. Food Research and Action Center.
- ¹⁹³ New York State Department of Health. (n.d.). *Crediting Foods in CACFP*. New York State Department of Health.
- ¹⁹⁴ Itoyama, S., & Wroblewski, L. (2013). *The Child and Adult Care Food Program in Massachusetts*. Harvard Food Law and Policy Clinic.
- ¹⁹⁵ Dev, D. A., Byrd-Williams, C., Ramsay, S., McBride, B. A., Srivastava, D., Murriel, A. L., . . . and Adachi-Mejia, A. M. (2017). Engaging Parents to Promote Children's Nutrition and Health: Providers' Barriers and Strategies in Head Start and Child Care Centers. *Faculty Publications, Department of Child, Youth, and Family Studies, 140*.

-
- ¹⁹⁶ Food Research and Action Center. (n.d.). *Improving Nutrition and Promoting Wellness in Child Care With CACFP*. Food Research and Action Center.
- ¹⁹⁷ Center on Budget and Policy Priorities. (2017). *Policy Basics: Special Supplemental Nutrition Program for Women, Infants, and Children*. Center on Budget and Policy Priorities.
- ¹⁹⁸ Food Research and Action Center. (2019). *Making WIC Work Better: Strategies to Reach More Women and Children and Strengthen Benefits Use*. Food Research and Action Center.
- ¹⁹⁹ Food Research and Action Center. (2019). *Profile of Infants and Toddlers in the United States: Hunger, Poverty, Health, and the Federal Nutrition Programs*. Food Research and Action Center.
- ²⁰⁰ Gamblin, M. (2017). *Ending U.S. Hunger and Poverty by Focusing on Communities Where it's Most Likely*. Bread for the World Institute.
- ²⁰¹ Hall, L., & Neuberger, Z. (2021, October 5). *Eligible Low-Income Children Missing Out on Crucial WIC Benefits During Pandemic*. Retrieved from Center on Budget and Policy Priorities: <https://www.cbpp.org/research/food-assistance/eligible-low-income-children-missing-out-on-crucial-wic-benefits-during>
- ²⁰² Snap to Health. (n.d.). *History of WIC*. Retrieved from Snap to Health: <https://www.snaptohealth.org/wic-2/history-of-wic/>
- ²⁰³ National WIC Association. (2018). *WIC Program Overview and History*. Retrieved from National WIC Association: <https://www.nwica.org/overview-and-history>
- ²⁰⁴ Center on Budget and Policy Priorities. (2017). *Policy Basics: Special Supplemental Nutrition Program for Women, Infants, and Children*. Center on Budget and Policy Priorities.
- ²⁰⁵ Food and Nutrition Service. (2021, June 29). *WIC Farmers' Market Nutrition Program* . Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/fmnp/fact-sheet-2021>
- ²⁰⁶ Mass. Gen. Laws Ch. 111I, §1-5. An Act Establishing School Based Nutrition and Childhood Hunger Relief Programs. 1992 Mass. Acts 414. 14 January 1993.
- ²⁰⁷ Mass.gov. (n.d.). *The Good Food Project and WIC Recipes*. Retrieved from Mass.gov: <https://www.mass.gov/info-details/the-good-food-project-and-wic-recipes>
- ²⁰⁸ Food and Nutrition Service. (2021, June 29). *WIC Farmers' Market Nutrition Program* . Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/fmnp/fact-sheet-2021>
- ²⁰⁹ Food and Nutrition Service. (2021, June 25). *WIC Eligibility and Coverage Rates - 2018*. Retrieved from United States Department of Agriculture: <https://www.fns.usda.gov/wic/eligibility-and-coverage-rates-2018#5>
- ²¹⁰ National Center for Education Statistics. (2020). *Percentage of 3- to 5-year-old children enrolled in school, by age and selected child and family characteristics: 2010 through 2019*. Retrieved from National Center for Education Statistics: https://nces.ed.gov/programs/digest/d20/tables/dt20_202.20.asp
- ²¹¹ Arteaga, I., Heflin, C., & Gable, S. (2016). The impact of aging out of WIC on food security in households with children. *Children and Youth Services Review*, 69, 82-96.
- ²¹² National WIC Association. (2021). *Enhancing the WIC Food Package*. National WIC Association.
- ²¹³ Ibid.

-
- ²¹⁴ Food and Nutrition Service. (2021, June 25). *WIC Eligibility and Coverage Rates - 2018*. Retrieved from United States Department of Agriculture:
<https://www.fns.usda.gov/wic/eligibility-and-coverage-rates-2018#5>
- ²¹⁵ Center on Budget and Policy Priorities. (n.d.). *Assessing Your WIC Certification Practices*. Retrieved from Center on Budget and Policy Priorities:
<https://www.cbpp.org/research/food-assistance/assessing-your-wic-certification-practices#questions-enrollment>