

October 19, 2023

New Universal No-cost School Meals Program Aims to Address Childhood Hunger, but Excludes Nonpublic Schools

In a Nutshell

- The Fiscal Year 2024 state K-12 education budget took a step to address childhood hunger by making no-cost school breakfasts and lunches available to all public school students, regardless of income, starting this fall.
- School meals are critical to student health and well-being, especially for low-income students, and ensure that students have nutrition they need throughout the day to learn.
- Regrettably, Michigan’s new universal no-cost school meal program is only available to public schools and freezes out hungry students attending nonpublic schools.

The Fiscal Year (FY)2024 state K-12 education budget took a step to address childhood food insecurity in Michigan by making no-cost school breakfasts and lunches available to all public school students, regardless of income, starting this fall. This move came after the federal government issued waivers that allowed schools across the country to receive federal reimbursement to provide universal no-cost school meals to all children during the COVID-19 pandemic. When the federal “free meal” waiver expired at the start of the 2022-23 school year, schools that participated in the federal school lunch/breakfast programs were forced to return to charging students for meals if they were not eligible for free breakfast and lunch.

School meals are critical to student health and well-being, especially for low-income students, and ensure that students have nutrition they need throughout the day to learn. Research shows that receiving free school meals reduces food insecurity, obesity rates, and poor health. Further, universal no-cost meals removes the public stigma that is often attached to receiving free or reduced-price lunches by poor students. This stigma causes some hungry children to avoid participating in school feeding programs.

With the new funding included in the state budget, Michigan joined a handful of states that now offer public schools the opportunity to provide universal no-cost meals to their students, regardless of income. The funding allows Michigan public schools to bridge the financing gap between what the federal government covers and the actual costs schools incur to provide all students with access to two healthy and nutritious meals a day. Unfortunately, the full potential of this new program to address childhood hunger will not be realized because policymakers decided to limit eligibility for universal no-cost school meals to students attending public school, excluding hungry nonpublic school students.

COVID-19 Shines Light on Food Insecurity, Schools Serve Valuable Role

Before the pandemic, more than one in seven (14.1 percent) Michigan children were considered “food insecure”. And, proportionately fewer Michigan children in 2019 experienced food insecurity than the nation as a whole (14.6 percent of U.S. children).

Since, Michigan’s rate of childhood food insecurity dipped to 13.1 percent in 2021 (latest data). While the decline represents improvement, an estimated 282,000 Michigan children lacked access to adequate healthy

and nutritious food in 2021. Further, the state's percentage of food insecure children is now above the national average of 12.8 percent.

This suggests that more can be done. Especially because childhood hunger varies widely across the Mitten State and across different populations. County rates of childhood food insecurity in 2021 ranged from over 22 percent in Wayne County to the single-digits in a few Northern counties. While Black and Latinx populations generally experience higher levels of food insufficiency as a result of systemic inequalities, these gaps widened during the pandemic in many communities across the country.

Because schools serve millions of meals to students every day through existing federal meals programs, they are the largest set of food distribution sites in the United States. Using schools and existing structures is a logical policy approach to further reduce childhood hunger. A similar approach has been employed to address other challenges facing youth populations, including efforts to provide mental health assessments and services within the school setting.

During the pandemic the federal government stepped up with several waivers to help schools continue to feed children while mitigating the spread of disease, providing schools relief from regulations that monitor how, when, and who gets meals. Notably, one waiver allowed all schools participating in the National School Lunch Program to receive full federal reimbursement to provide no-cost meals to all students, regardless of income. According to the federal government, food-insecure households with children decreased by 2.3 percentage points between 2020 and 2021 when the "free meal" waiver was in effect.

Similarly, making free meals available to all students during the pandemic likely contributed to the decline in Michigan's childhood food insecurity rate discussed above. The percentage of Michigan students that received access to "free" lunch rose from 71 percent in the 2018-19 school year to almost 100 percent in the 2020-21 school year. Universal access to no-cost lunch allowed more than 850,000 of Michigan's nearly 1.4 million public school children to participate in the program in the 2021-22 school year, up 45 percent from 2020-21.

However, the "free meals" waiver granted to all states expired in Summer 2022 and congressional agreement in making the policy permanent through the Universal School Meals Program Act of 2021 did not materialize. Therefore, at the start of the 2022-23 school year, the nation's schools were forced to return to charging students not eligible for free meals under existing federal programs.

States Step up to Fill Void

Recognizing the benefits accruing to students' academic, physical, and social development that arise from having access to healthy and nutritious food while at school, as well as the reductions to childhood hunger more broadly, a number of states stepped up to fill the void after the federal "free meals" waivers expired. As of this fall, nine states have adopted statewide policies to offer universal no-cost breakfasts and lunches to public school students, regardless of their income.

These nine states are providing bridge financing to cover the difference between what public schools are reimbursed by the federal government and their actual costs of serving meals to all students. California and Maine adopted their policies at the beginning of the 2022-23 school year so students in those states did not experience a break in "free meal" service after the federal waiver expired. The remaining states, including Michigan, began their universal no-cost school meals programs this past summer or this fall.

As would be expected, states designed their programs to meet the uniqueness of the challenges they faced in feeding students. While programs vary across many dimensions, they share some commonalities. For example, all programs work within existing federal school feeding programs and encourage participating schools to maximize federal reimbursement in order to minimize the state's cost-share. This includes requiring districts and schools that are eligible for the voluntary federal Community Eligibility Provision (CEP) to participate in that program. CEP allows low-income schools and districts to serve meals to all students for free and without having to collect free-meal applications from students. To be eligible for the program, a district, an individual school, or a group of schools must have an Identified Student Population (ISP) of at least 40 percent of the

school/district total enrollment. (“Identified students” are those that are directly certified to participate in other federal feeding programs, such as SNAP.)

Most new state programs also require schools to eliminate student “lunch debt” as a condition of participating. Because federal funding is not allowed to be used to cover unpaid student meal balances, states are either providing the funding to do so or asking schools to take on this burden as they implement new universal no-cost meal programs. According to the Education Data Initiative, more than 30 million students in the US can’t afford their school meals and, on average, they carry \$181 per student in lunch debt annually.

Michigan’s Approach Excludes Nonpublic Schools

Michigan’s new policy originated in Governor Whitmer’s FY2024 executive budget proposal and was included in the final School Aid budget enacted by the legislature. The state budget appropriated \$25 million to begin providing universal no-cost meals (breakfast and lunch) this past summer for those schools that run summer feeding programs. In addition, \$160 million from the state School Aid Fund was appropriated to cover the state’s portion of the full-year costs for the 2023-24 school year. This funding will leverage nearly \$920 million in federal meal assistance to provide universal no-cost school meals to all K-12 students enrolled in traditional public and charter public schools, as well as special education students to age 26. The program also covers the state’s youngest learners enrolled in the Great Start Readiness Program.

Regrettably, the new universal no-cost school meal program is only available to public schools. Policymakers excluded nonprofit, nonpublic schools from the new program, a notable break from the federal government’s “free meal” waiver. During the pandemic school years, Michigan nonpublic K-12 schools that participate in the federal school breakfast and lunch programs were able to use federal funding to feed all students, regardless of income. While the design of Michigan’s new program aligns with many other states that limit eligibility to public school students, state’s are not required to do so. For instance, New Mexico’s universal no-cost program is truly universal. It is open to both public and nonpublic schools.

Some have cited state constitutional restrictions as a justification for excluding nonpublic students from access to no-cost meals. Article VIII, Section 2 of the 1963 Michigan Constitution, commonly referred to as the state’s “anti-parochialism” or “Blaine” amendment, is generally understood to prohibit the state from directly or indirectly aiding nonpublic schools. However, over the years, Michigan courts have ruled that public dollars may be used to reimburse nonpublic schools for certain expenses without violating the state constitution. Lawmakers have appropriated public monies for nonpublic schools to cover a number of student-focused, academic, health and wellness initiatives, including these current-year appropriations:

- \$18 million for school safety-related projects as well as mental health services
- \$3 million for high school students to dual enroll in college courses and earn college credits
- \$1 million for the cost of complying with state health and safety mandates

Another misplaced concern voiced about including nonpublic schools in the state’s new student feeding program is the use of School Aid Fund dollars to finance the \$160 million appropriation. While it is the case that the state constitution restricts the use of these earmarked funds to public schools, higher education institutions, and school employee retirement systems, nothing prevents appropriators from using state general fund dollars to finance universal no-cost meals for nonpublic school students. General fund dollars are used to support the other nonpublic school appropriations included in the state’s K-12 education budget.

Given Michigan’s historical track record of public support for nonpublic school students’ general welfare and health, excluding them from a feeding program is a head-scratcher. With the state’s childhood food insecurity rate now above the national average, excluding any hungry child from participating in the new universal, no-cost meal program will limit the state’s overall efforts to address childhood hunger.

ABOUT THE AUTHOR

Craig Thiel - Research Director



Craig is the Research Council's Research Director and primary researcher of education and school finance issues. Prior to becoming Research Director, Craig served as the Director of State Affairs and as a Senior Research Associate. During his graduate school studies, he worked for the Council as a Lent Upson-Loren Miller Fellow from 1993 to 1995. Before joining the Council in 2006, Craig worked for ten years as a fiscal analyst at both the Senate Fiscal Agency and the House Fiscal Agency. He previously worked for the Michigan Department of State, Office of Policy and Planning and the United States Environmental Protection Agency in Chicago.

Craig holds a B.A. in Economics and Political Science from Kalamazoo College and a Masters in Public Administration from Wayne State University. He holds positions on various professional, nonprofit, and local government boards/associations.

Founded in 1916, the Citizens Research Council of Michigan works to improve government in Michigan. The organization provides factual, unbiased, independent information concerning significant issues of state and local government organization, policy, and finance. By delivery of this information to policymakers and citizens, the Citizens Research Council aims to ensure sound and rational public policy formation in Michigan. For more information, visit www.crcmich.org.

Southeast Michigan

38777 Six Mile Rd. Suite 208, Livonia, MI 48152
(734) 542-8001

Mid Michigan

115 W Allegan St. Suite 480, Lansing, MI 48933
(517) 485-9444
Detroit (313) 572-1840
West Michigan (616) 294-8359

A Fact Tank Cannot Run on Fumes

Do you want to ensure better policy decisions and better government in Michigan? A donation to support our organization will help us to continue providing the trusted, unbiased, high-quality public policy research Michigan needs. We also accept charitable bequests. Click the gas tank to donate or learn more about planned giving.

