

Unpaid School Meals Fees: A Review of 50 Large School Districts' Policies

Introduction

In 2016, the U.S. Department of Agriculture (USDA) issued guidance requiring each school district participating in the National School Lunch or School Breakfast programs to establish and clearly communicate by July 1, 2017, its policy for collecting unpaid school meals fees, in effect for the 2017–2018 school year.¹ The USDA guidance does not establish any national standards for what districts need to include in their policies, nor does it provide any baseline for protecting children and families; instead, it only requires that there be a policy.

A school district's school meals charge policy guides schools on how to handle situations where students — who are not certified to receive free school meals — arrive in the cafeteria without cash in hand or in their school meals account. The policy impacts two categories of students: those who are not certified for free or reduced-price school meals and are charged the meal price set by the district; and those who are certified for reduced-price school meals, and are charged 30 cents per day for breakfast and 40 cents for lunch, if the district has not eliminated the reduced-price school breakfast and lunch copayments.

School meals debt is a common problem for school districts across the country, with 76 percent reporting they have outstanding debt.² How school districts choose to deal with unpaid school meals debt has a big impact on students and the quality of the culture inside and outside of the school cafeteria. It also affects whether or not students have the healthy nutrition they need to focus and concentrate throughout the school day. To ensure students have adequate nutrition, unpaid school meals fees policies should:

¹ U.S. Department of Agriculture, Food and Nutrition Service. (2016). Memo SP 46 2016: Unpaid Meal Fees: Local Meal Charge Policies. Available at: <https://fns-prod.azureedge.net/sites/default/files/cn/SP46-2016os.pdf>. Accessed on September 5, 2017.

² School Nutrition Association. (2016). *School Nutrition Operations Report*. This source is available to the public for purchase at <https://my.schoolnutrition.org/productcatalog/product.aspx?ID=10545>.

- prohibit students from being singled out or embarrassed if they are unable to pay for their school meal;
- require schools to directly communicate with the parent or guardian, not the students, about unpaid school meals debt;
- take steps to qualify students for free or reduced-price school meals when they are eligible, if they have unpaid school meals debt; and
- support a positive school environment.

The Food Research & Action Center recently reviewed the policies of 50 large school districts across the nation. Of the 50 surveyed, eight school districts offer free school meals to all students, so there is no need for an unpaid meal policy. Out of the remaining 42 school districts, 40 had an established, unpaid meal policy at the time of the survey, while two districts did not yet have an approved policy.

This report is a summary of the review's findings and highlights the practices included in the 40 large districts' unpaid meal policies. The analysis of these policies also provides an important roadmap for anti-hunger advocates, schools, districts and states as they work with school districts to implement unpaid school meal policies that are good for students and good for the school environment. A list of the 50 large school districts included in this report, including links to the available policies that are posted on the applicable school district's website, can be found in the appendix.

Acknowledgments

This report was prepared by Qwamel Hanks and Crystal FitzSimons, with special assistance from Andrew Garrison and Liliana Pond.

Findings

Few Have a Universal Policy That Applies Equally to All Students

Only 12 of the 40 school districts that have an unpaid meal policy have one policy for all students. Most school districts have developed two unpaid meal policies: one for younger students (generally elementary schools) and one for older students (generally middle and high schools).

In the school districts with two-tiered guidance, policies typically are more generous for elementary school students, allowing them to receive school meals, regardless of their ability to pay, or permitting them to charge additional meals on their school meals accounts. This approach does not acknowledge that older students need access to nutritious meals just as much as younger students do.

Provision of Meals to Students

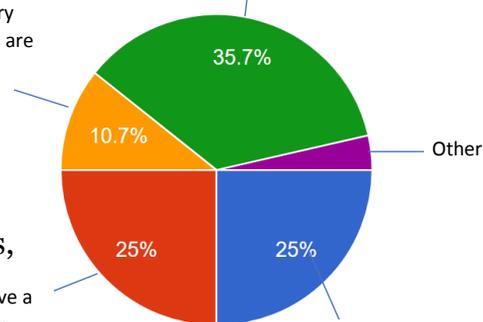
Districts may choose to provide meals to students, regardless of whether students can pay, even if they have unpaid school meals debt. Because students require good nutrition in order to focus and excel in school, it is important for schools to ensure that students have access to good nutrition regardless of a student's ability to pay. Out of the 40 surveyed school districts that have an unpaid school meals fees policy:

- Thirteen provide meals to all students for all meals, regardless of whether they can pay.
- Ten do not provide any meals or grace period to secondary students who cannot pay.
- Seventeen school districts place a cap, or maximum amount, on the provision of meals to either secondary school students or to all students with debt. Out of these 17 school districts, seven always provide a meal to elementary students, but establish caps for secondary students.

Caps are placed on elementary students; secondary students are not provided with meals

Elementary students always receive a meal; caps are placed on secondary students

All students receive a meal until the cap is reached; cap amount depends on grade level



Elementary students always receive a meal. Secondary students are not provided with meals

Meal Types

For schools that provide meals to students who cannot pay, the meal can be the regular school lunch or breakfast that is being served to students, or an alternate meal. School districts can choose to provide alternate meals that meet the federal nutrition standards and qualify for reimbursement. An example of an alternate meal is a peanut butter sandwich, a fruit or vegetable, and milk. Some districts will simply serve milk and fruit. In addition, some school districts charge the student's school meal account for an alternate meal. The best practice is to always serve the regular school meal, regardless of the school meal account balance or the student's ability to pay.

When schools provide an alternate meal, it is important for schools to do it in a way that does not stigmatize students. For example, the alternate meal can be offered as an option to all students. Out of the 40 surveyed school districts with unpaid school meals fees policies:

- The regular meal is offered to students who cannot pay in 12 of the school districts.
- Regular meals are served to students during a grace period in 12 districts; alternate meals are served once the cap is reached.
- One district offers the regular meal to elementary students during a grace period; high school students who cannot pay are immediately served the alternate meal.
- An alternate meal is immediately served to all students in 13 school districts.
- The type of meal provided for students who cannot pay is not described in two school districts' policies.

Of the 26 school districts that serve alternate meals, whether immediately or after reaching the cap:

- Fourteen school districts do not charge the student for the meal; two school districts do charge students; nine do not specify whether or not they charge; and one school district charges alternate meals to the school's National Parent Teacher Association.
- Six school districts offer alternate meals that are federally reimbursable and follow the federal nutrition standards; the other 20 school districts do not specify if the alternate meal is reimbursable.

Prevention of Stigma and Shaming

Numerous news stories have reported school districts stamping the hands or placing stickers on students with unpaid school meals debt. The stamps and stickers say phrases, such as “I need school lunch money.” Such practices can cause embarrassment and shame for affected students and also negatively impact the culture of the cafeteria and the school.

While most school districts do not mention shaming acts in their policy, only a few have explicit language that prohibits the stigmatizing of children who cannot pay for their meals. Unpaid meal policies should affirm a commitment to not embarrass students and clearly define what immediate actions to take and what should be prohibited when a student cannot pay for a meal. Out of the 40 large school districts surveyed that have unpaid school meals fees policies:

- Fourteen of the unpaid school meals fees policies do not mention or define what immediate actions, if any, are taken when a student cannot pay for their meal.
- Twenty of the unpaid school meals fees policies do not notify or take any action at the student level to address school meals debt.
- Three school districts instruct schools to hand an envelope to students describing the amount of unpaid meal debt owed.
- One school district requires students to sign a charge slip when they cannot pay for their school meal.
- One school district places students with unpaid meal debt at the front of the line to receive their alternate meal.
- One school district’s policy provides meals in exchange for the student performing chores in the kitchen. The student must first apply and be accepted to work in order to receive the meal.

Certifying Students to be Eligible for Free or Reduced-Price School Meals

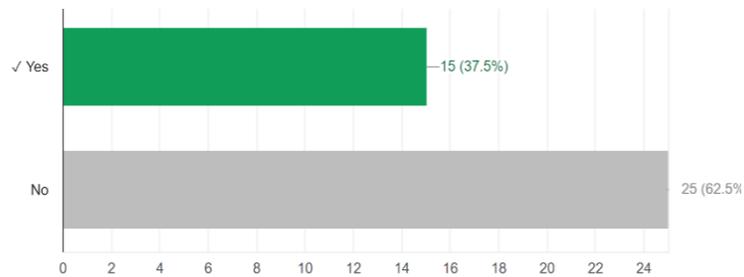
When a family accrues school meals debt, it often is a sign that the family is struggling to make ends meet and the student may be eligible for free or reduced-price school meals. There are many possible reasons why an eligible student may not be certified for free or reduced-price school meals. The student may have been eligible at the start of the school year, but missed by direct certification systems that do not always identify every student who is categorically eligible for free school meals (such as a child who lives in a household participating in the Supplemental Nutrition Assistance Program, or if they are homeless). The eligible student may not have submitted a school meal application, perhaps due to language or other barriers. There are also instances when the student

may have become eligible during the school year, due to changes in the household income.

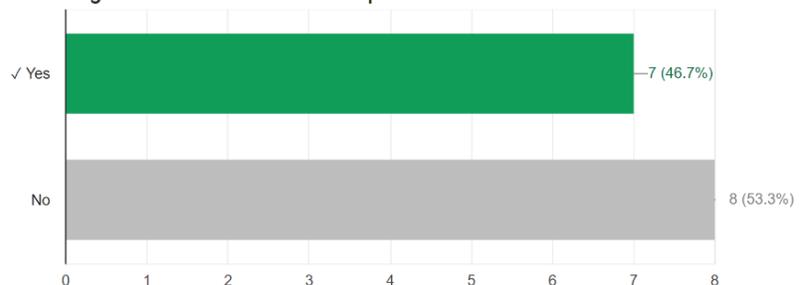
A strong unpaid school meals fees policy includes clearly defined steps that school administrators will take to certify eligible students with unpaid meal debt for free or reduced-price school meals.

- Of the 40 school district policies, 25 do not include any language about certifying eligible students for free or reduced-price school meals.
- For the 15 school districts that include some language on certifying students, eight school districts' policies do not elaborate or describe the steps the school district will take to certify the students.

Does the School Food Authority (SFA) take steps to determine whether students with unpaid meal debt should be certified for free and reduced-price meals?



Does the policy describe the steps a district will take to certify students eligible for free and reduced-price meals?



Collecting Debt

Under USDA's policy, School Food Authorities (SFA) cannot charge unpaid school meals debt to the school district's school nutrition account, but SFAs have the discretion to write off debt as uncollectable at the end of the school year, or carry the debt and collection efforts over to the next academic year. For students who are not certified for free and reduced-price meals after additional efforts by the school district, working with households to develop long-term payment plans is a much better practice than using outside debt collection agencies. Such agencies often charge fees and increase the debt for a family that is struggling already.

From the 40 surveyed school districts with unpaid school meals fees policies:

- Households are notified about unpaid meal debt via telephone, written letters, or during in-person meetings in 20 of the school districts.
- An outside, debt-collecting agency is hired for unpaid school meals debt in two of the school districts.

- No district mentions working with households to create a long-term repayment plan in its policies.

Preventing School Meals Debt

School districts are taking a number of steps to prevent school meals debt from occurring or to reduce it. One of the easiest ways to eliminate school meals debt is to offer free meals to all students, which is what happens in eight of the 50 districts that were reviewed. In addition to the eight schools that serve free meals to all students in the school district, 17 school districts offer free meals to all students in some of their schools.

Federal options, such as the Community Eligibility Provision and Provision 2, allow high-need schools to offer free meals to all students. These provisions offer numerous benefits beyond eliminating school meals debt, including increased school meals participation, elimination of stigma for students, and reduced paperwork for parents or guardians and school staff. The reduced administrative costs and reimbursements resulting from the increased participation also generate economies of scale and can make offering free meals financially viable for many districts.

Districts that are unable to offer free meals to all students can consider eliminating the reduced-price copay for school breakfast and lunch. It is unknown how many students certified for reduced-price meals are accruing meal debt, but this is the population most likely to be struggling to pay for meals. The fee, therefore, can be a barrier to participation as well as a driver of debt.

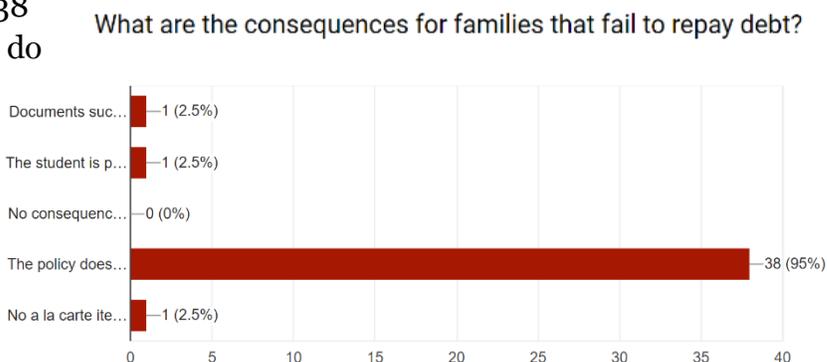
School districts also can establish a prepaid meal system that allows parents or guardians to add money to the account at any point during the school year, or waive school meals debt if a student is certified for free or reduced-price school meals mid-year.

- Of the 40 school districts with an unpaid school meals fee policy, 16 discuss a prepayment system for school meals.
- Nearly one-third — or 12 — have policies that do not define any measures for preventing or reducing school meals debt.
- In four of the 40 school districts, schools carry debt over from the end of a school year to the next school year.
- Seventeen school districts prevent school meals debt by providing free school meals to all students in some of their schools that have a high number of free and reduced-price eligible students.

Penalties in Accumulated Debt

Unpaid school meals fees policies should explicitly prohibit schools from withholding documents, such as report cards, and excluding students with debt from school organizations and activities.

- The majority of policies, 38 of the 40 school districts, do not define what measures are permitted or prohibited for students and households that fail to pay school meals debt.
- One school district says it withholds documents from students with uncollectable school meals debt.
- One school district has an unpaid meal policy that prohibits students with debt from participating in school organizations or activities.



Conclusion

FRAC's review of 50 large school districts' unpaid school meals fees policies found that some school districts have established very strong and clear policies that ensure students are able to access nutritious meals at school, despite a balance on a student's school meals account or the student lacking the means to pay for the meal at the point-of-sale. These school districts' policies also discourage stigma and embarrassment from occurring in the cafeteria.

Some policies, though, include concerning practices, such as having a less generous or more punitive approach — particularly for secondary school students, embarrassing students by making it visible when they owe debt, having students do chores in exchange for meals, withholding documents, not allowing students to participate in school activities, or using a debt collector to recover unpaid school meals debt. Such policies neither support students, nor foster a positive school environment.

The majority of school districts, however, don't follow either course. Instead they have policies that omit language concerning important procedures and practices. Policies that

are too vague leave room for individuals on school staff to act independently and inappropriately, often in ways that are not conducive to creating a safe and healthy environment for all students.

FRAC strongly encourages all school districts to create unpaid school meals fees policies that include specific and supportive practices that allow all students to be well-nourished, prevent stigmatizing students with unpaid school meals fees debt, take advantage of opportunities to serve meals free to all students, set up easy processes to certify students who are eligible for free and reduced-price meals, and do not penalize students for debt. Anti-hunger advocates and state agencies can work with school districts to include best practices in their policies. These approaches are outlined in [FRAC's *Establishing Unpaid Meal Fee Policies: Best Practices to Ensure Access and Prevent Stigma*](#).

Appendix

The 50 large school districts included in this report (with links to the policies that are posted on the school district's website) are:

Albuquerque Public, New Mexico	Fairfax County Public, Virginia	North East Independent, Texas
Aldine Independent, Texas	Fort Bend Independent, Texas	Northside Independent-San Antonio, Texas*
Alpine, Utah	Fort Worth Independent, Texas	Orange County Public, Florida
Anne Arundel County Public, Maryland	Fresno Unified, California	Pasco County, Florida
Austin Independent, Texas	Fulton County, Georgia	Pinellas County, Florida
Baltimore City Public, Maryland	Granite, Utah	Prince George County Public, Virginia
Baltimore County Public, Maryland	Greenville 01, South Carolina	Prince William County Public, Virginia
Charlotte-Mecklenburg Schools, North Carol	Guilford County, North Carolina	San Diego Unified, California
Chicago Public, Illinois	Gwinnett County, Georgia	School District of Philadelphia, Pennsylvania
Clark County, Nevada	Hillsborough County, Florida	Shelby County, Tennessee
Cobb County, Georgia	Jefferson County R-1, Colorado	The School District of Lee County, Florida
Cypress-Fairbanks Independent, Texas	Katy Independent, Texas	The School District of Palm Beach County, Florida
Davis, Utah	Long Beach Unified, California	Wake County Public, North Carolina
DeKalb County, Georgia	Los Angeles Unified, California	Washoe County, Nevada
Denver Public, Colorado	Los Angeles Unified, California	
Detroit Public, Michigan	Loudoun County Public, Virginia	
Duval County, Florida	Miami-Dade County Public, Florida	
	Milwaukee Public, Wisconsin	
	Metropolitan Nashville Public, Tennessee	
	Montgomery County Public, Kentucky	

*If the embedded link did not work for Northside Independent-San Antonio, Texas, please paste this link into a browser window: https://nisd.net/sites/default/files/child_nutrition/2017-18%20Charge%20Letter.pdf.

NOTE: School districts that do not have a link to their unpaid school meal fee policy either are offering free meals to all students or did not post said policy to their website when FRAC reviewed the policy for that school district.

UPDATE: The list of school districts was revised on September 12, 2017. The earlier copy of the survey listed Alpine School District, Utah, as Alpine Independent School District, Texas. Two school districts' survey results were also affected: data for Montgomery County Public School District in Kentucky were shown for Montgomery County Public School District in Maryland; and data for Prince George County Public School District in Virginia were shown for Prince George's County Public School District in Maryland.

Technical Notes

The survey questions used for the review of school districts' unpaid school meal policies were developed by the Food Research & Action Center (FRAC). Information about each school district's unpaid meal policy was gathered during July 2017. FRAC reviewed the school districts' policies that were publicly posted on the school districts' websites. If the policy was not posted, or could not be found on the website, FRAC contacted the school district to get a copy of the policy or to confirm that the school district had not finalized its policy.