January 14, 2015
Jessica Saracino
Program Analyst, School Programs Branch
Child Nutrition Programs, Food and Nutrition Service
P.O. Box 66740
Saint Louis, MO 63166-6740

Re: Request for Information—Unpaid Meal Charges

Dear Ms. Saracino:

On behalf of the 1.6 million members of the American Federation of Teachers (AFT), including school food service workers, I welcome the opportunity to share some examples from our K-12 members of current practices regarding meal charges and alternate meals.

The AFT has seen the benefits of healthier school meals, more school gardens, and the incorporation of nutrition into the school curriculum all across the country. Our members are on the frontlines, fighting against hunger in our schools. Our food service workers are always striving—sometimes even behind the scenes—to make sure every student has something to eat, regardless of his or her meal plan status. Many of our classroom teachers keep a desk drawer or cabinet filled with food and snacks for the students they know will come to school hungry. For years, our members have supported greater access to healthier foods for students, especially those children whose only meals may be the ones they receive during school hours.

While child obesity is on the rise, many American families live in communities where access to healthy foods is not an option. This is simply because there is no place near their homes to purchase fresh fruits and vegetables. Some communities do not even have a grocery store. The school meal program has played an important role in reducing child hunger, but it now also fills the void in access to healthy foods. The AFT fully supported the higher nutritional standards for school meals established by the Healthy, Hunger-Free Kids Act of 2010 because we understood those changes would lead to countless benefits for our students, such as decreases in absenteeism, optimal growth and development, increased ability to focus, improved behavior, and learning healthy eating habits they might even share with their families.

In the fall of 2014, we surveyed our members who are school food service workers, as well as some of our teachers, teaching assistants and school staff, on the effect of alternate meals, and on meal policies in general. The 200 survey participants work in elementary and secondary schools in four different geographical locations. The survey results were clear that school meal programs do not operate only with children’s health in mind but also with the priority of financial solvency. According to 42.9 percent of food service workers, their “school nutrition program’s expenses will exceed revenue for the 2014-2015 school year.” They named decreased student participation, increased food costs and other indirect costs as moderate or serious problems.
challenges to keeping the budget in the black. One food service worker added, “Being able to collect on bills when students are allowed to continue to charge and run up large account balances [is a] Serious Challenge.”

When the urgency of promoting children’s health collides with attention to program costs, alternate meal policies attempt to smooth the edges of the fallout. But these policies are too often insufficient, ineffective, stigmatizing, discriminatory and/or burdensome. In our survey, 38.7 percent of respondents report that these competing priorities are at the students’ expense.

- Nearly 1 in 3 reported seeing children go hungry. A high school teacher’s aide in West Virginia commented that in her school, “Some students don’t eat due to the lunch bill.” Other schools offer peanut butter and jelly sandwiches, cheese sandwiches and salads, though members are not thrilled to offer these alternatives.
- More than 1 in 4 has witnessed children stigmatized and marginalized. Said one Florida middle school teacher, “Students with negative balance may not participate in some school functions and field trips.”
- More than 1 in 10 has seen a policy negatively affect a child’s academic, cognitive and/or athletic performance.

Rather than implement problematic policies, many AFT members admit that they take it upon themselves to ensure a child receives a good meal or a family is spared embarrassment: “Truth be told, there are a few of us who make sure the students don’t go without lunch. We pay their bill!!” said a former chef and cafeteria manager from West Virginia.

The school meal programs must be fair and equitable for all children. By using the comments and information gathered from our survey, the AFT hopes the following information will be useful as the Food and Nutrition Service (FNS) begins to provide guidance to states, local educational agencies and schools on how to effectively and fairly address alternate meals and delinquent accounts:

**Champion structures that ensure all children have regular, nutritious meals.**

Despite strong efforts and best intentions, the use of alternate meals discriminates against students, in particular students whose families may already live in a precarious financial situation. Our members overwhelming called for a policy that puts children first. Specially, respondents to the survey suggested:

- “I will never support a system that singles out a child to an alternate meal because parents didn’t pay. No matter how discreet you are in your collection effort, as soon as that child is handed the ‘cheese sandwich’ you have stripped him of privacy and dignity.” –Food service worker, West Virginia
- “I’m not sure that there is a right answer, but there is certainly a better answer. Even young students are extremely aware of their meal status and sensitive to being singled out.” –Elementary (K-5) media specialist, Florida
- “Everyone knows why the student is receiving this ‘alternative meal,’ which not only is inferior nutritionally, but sets a very negative tone towards that student who already suffers in so many ways because of the family
economic situation. This appears to label the ‘haves’ and the ‘have nots’!” – Autism aide, West Virginia

**Expand eligibility for Community Eligibility Provision.**
As implemented under the Healthy, Hunger-Free Kids Act of 2010, direct enrollment and the Community Eligibility Provision (CEP) are doing incredible work to ensure access to school meals for children who are in vulnerable situations. However, districts and schools that only offer the National School Lunch Program are ineligible to participate in the CEP. These schools should be supported in a transition to offer breakfast programs, and the CEP may be an excellent way to provide both the financial security and consistent participation that allows them to do so.

The CEP allows many respondents’ schools to focus on children’s health. Significantly more respondents (58.97 percent) working in schools that implemented the CEP reported that they did not see problems with an alternate meal policy than did those working in schools with paid meal programs (21.05 percent, p < 0.000). In fact, members emphatically supported free meals for all students:

- “All public School Children SHOULD be receiving free Meals.” – School service personnel, West Virginia
- “Meals should be free for everyone. In any case, no child should ever be turned away or harassed because of his/her family situation.” – Food service worker, West Virginia

**Provide support for schools and districts that continue to use alternate meal policies.**
If the CEP remains a possible solution for some schools and districts, the Utah State Board of Education’s (USBE) “Model Policy Recommendations Regarding Child Nutrition Program Charges” offers some possible steps forward for schools that continue to use paid meal programs with federal support. Our survey asked respondents to express support or opposition for the USBE recommendations, and their responses were mixed.

- Members overwhelmingly supported the USBE’s recommendations related to education and communication on alternate policies.
  - 95.1 percent supported communicating about the policy before the school year starts, such as in the student handbook;
  - 88.5 percent supported protocols to ensure that eligible families receive applications for the free- and reduced-price meal programs; and
  - 83.61 percent supported the use of direct enrollment by data-sharing with the Special Nutrition Assistance Program and other programs.
- Members were less enthusiastic about USBE recommendations on how to handle payment for meal accounts.
  - 41.8 percent of respondents supported verifying during meal service whether a student’s selection is reimbursable with federal funds; 41 percent opposed the policy.
Likewise, members were split as to whether families who pay in advance should receive incentives, such as reduced meal prices; 49.2 percent were in favor while 28.7 percent opposed the idea.

Members were most hesitant to support USBE recommendations for handling delinquent accounts.

- 39.0 percent opposed the USBE recommendation that schools contract with collection agencies to chase down payment.
- Respondents also rejected passing accountability for payment to other organizations, such as the Parent-Teacher Association; 31.4 percent opposed, while 27.1 percent supported.
- Though 34.8 percent supported the use of donors or fundraisers to cover costs, another 30.5 percent opposed the idea.

In the survey results, members explained that implementing alternate meal policies adds undue stress on important relationships in school. For example, a respondent reported that in one school, “It falls to student’s homeroom teacher to then collect money from families to cover the charge. [The responsibility of collecting] severely challenges the relationship between teacher and family, and has led to families no longer answering the phone when school calls, most often for outstanding balances less than $5.”

At the end of the day, the health and well-being of our children comes before the bottom line. Denying a child food, excluding a child from school activities or marginalizing a child goes against the AFT’s mission and the mission of FNS, which is “to provide children and needy families better access to food and a more healthful diet through its food assistance programs and comprehensive nutrition education efforts.” We look forward to continuing to work with the FNS as decisions on alternate meals and delinquent accounts are developed and finalized.

Sincerely,

Randi Weingarten
President

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