



# Policies and Practices to Increase Adoption of the Community Eligibility Provision for School Meals in North Carolina

Prepared for: North Carolina Alliance for Health

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## Executive Summary

The community eligibility provision (CEP) is a part of the Healthy, Hunger-Free Kids Act that allows schools and districts to extend free meals to all students regardless of ability to pay. The benefits of CEP and school meals have been well documented. Not only does the reliable access to meals boost student achievement and mitigate behavioral challenges, but it also reduces administrative burden on staff, as it eliminates the need to process and collect free and reduced price meal applications.

Despite these benefits, just 71.6% of eligible schools in North Carolina participated in the policy in 2018-2019. Common barriers to adoption are lack of financial viability, concern over reduction of Title I funding, and political feasibility challenges. Lack of full adoption by eligible schools both prevents more students from receiving free meals and reduces the level of federal reimbursement districts receive from administering the meals. Therefore, there is a need to identify what best practices can bolster uptake of this policy. Furthermore, understanding the specific barriers to CEP adoption in North Carolina will help boost participation in the state, as much of the existing research takes a national perspective.

This research project took a mixed methods approach, using both regression analysis and in-depth qualitative interviews, to answer the following question: **“What factors contribute to the successful adoption of CEP in schools and districts throughout North Carolina?”** The regressions focused on understanding what specific characteristics of schools contributed to CEP adoption. The interviews with school nutrition directors and board members sought to uncover strategies to boost adoption, and offer more descriptive information on the challenges districts faced in adopting CEP. The findings from the quantitative analysis illuminated the following relationships between CEP participation and other school-related characteristics:

- 1. Identified student percentage (ISP) level is a school’s greatest predictor of CEP participation**
- 2. Presence of a majority Black student population does positively impact CEP adoption, but its influence is mitigated by school ISP levels**
- 3. Democratic-leaning districts have a higher likelihood of adopting CEP and geography also has a small impact, but these relationships show ISP is still the greatest predictor of adoption**
- 4. School and district size do not appear to have a great impact on CEP adoption**

The findings from the quantitative analysis helped design the interview protocol and guide interviewee selection. Results from the qualitative analysis fall into the following three major themes.

- **Barriers:** Nutrition directors shared that the cost of the program and insufficient funds are the greatest barriers to adopting CEP. Declining school meal participation and a concern over not all schools in a district being eligible to adopt CEP were also cited as barriers.

- **Complements:** Among districts that successfully adopted CEP, directors resoundingly agreed that building strong relationships with the school board and engaging in communications, education, and advocacy with stakeholders around CEP were key to successfully adopting the policy. Increasing participation in the school meal program, particularly among students who typically would not receive free or reduced price meals, is critical to success as well.
- **A hope for permanent universal free meals:** Nutrition directors expressed great anxiety over the transition away from USDA waivers for universal free lunch expected next year. They noted parents may forget to fill out meal applications and that current declining school meal participation may make it difficult to continue with CEP. Directors expressed hope that CEP and the waivers will create a precedent for the implementation of permanent universal free meals.

In alignment with these findings, North Carolina Alliance for Health (NCAH) can advocate for CEP at the local, state, and federal levels by focusing on efforts that will bolster greater governmental and public support for CEP and universal free meals broadly. Through their efforts and expertise, it is recommended they advocate for the following strategies:

## Local

- Develop CEP coordinating committees
- Capture compelling stories about value of universal school meals
- Ensure students meal preferences are considered
- Share best practices across districts
- Engage in messaging workshops that draw from successful advocacy efforts in majority Black and Democratic districts

## State

- Consider allocating funding to districts to close gap between cost of CEP and federal reimbursement
- Evaluate impact of Medicaid as qualifier for inclusion in school's ISP
- Engage in school site visits to directly see impact of school meals

## Federal

- Pass legislation raising CEP reimbursement multiplier and lowering eligibility threshold
- Provide additional CEP reimbursements to accommodate for rising cost of living
- Offer grace period for schools transitioning off USDA waivers

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# I. Introduction

This Master’s Project will support NCAH’s Healthy Food Access portfolio. NCAH is a statewide, nonpartisan coalition that works to advance equitable policies to help North Carolinians live healthier lives.<sup>1</sup> Healthy Food Access, one of their core priority areas, encompasses advocacy efforts to fund school nutrition programs and promote policies that increase access to healthy food in schools.<sup>2</sup> NCAH believes a universal free school meal policy is the most equitable way to feed students, and they are a strong proponent of implementing this policy across the state, regardless of a student’s ability to pay.<sup>3</sup>

In alignment with NCAH’s values and objectives, the research question for this Master’s Project is as follows:

***“What factors contribute to the successful adoption of CEP in schools and districts throughout North Carolina?”***

CEP is celebrated by school and child nutrition advocates as a powerful tool to provide free meals to students in the public school system. Increased access to consistent nutrition has shown to both improve students’ academic outcomes and reduce behavioral problems.<sup>4</sup> Moreover, CEP participation can reduce paperwork for school administrators, lower levels of lunch debt for families and schools, and help eliminate stigma for students who receive free and reduced price lunch.<sup>5</sup> Despite these benefits, in the 2018-2019 school year, only 71.6% of eligible North Carolina public schools participated in CEP.<sup>6</sup> Not only would higher rates of CEP adoption boost the number of students who receive free school meals in North Carolina’s public schools, but it would also increase federal reimbursements by millions of dollars due to more meals being served.<sup>7</sup>

The results from this research project will help NCAH better understand what types of schools are and are not electing to adopt CEP, what factors contribute or act as barriers to the adoption of CEP, and how the organization can best leverage its efforts at the local, state, and federal levels to increase CEP adoption throughout North Carolina. Wider CEP adoption aligns with NCAH’s goals of boosting funding for school nutrition programs and increasing access to food in school settings. In addition, maxing out federal reimbursements from the CEP program could help garner support from North Carolina’s General Assembly to fund the difference for universal school meals, as the total would be lower than it currently stands.<sup>3</sup> Moreover, CEP adoption may be more critical than ever in the 2022-2023

school year as schools may need to transition back to CEP or traditional school meal applications after two years of USDA waivers implementing universal free school meals due to the COVID-19 pandemic.

## II. Landscape Analysis

### *CEP Overview*

CEP is a portion of the Healthy, Hunger-Free Kids Act administered by the U.S. Department of Agriculture (USDA). It allows schools and districts who participate in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) to offer free school meals to all students, regardless of income.<sup>8</sup> North Carolina schools became eligible for this program in the 2014-2015 school year.<sup>9</sup> As of the 2018-2019 school year, 28,614 schools across the country participated in community eligibility, reaching a total of 13.6 million students.<sup>6</sup>

To be eligible for CEP, a school, group of schools, or entire district must average an ISP of 40% or more. Identified students are those who can automatically receive free school breakfast and lunch without a meal application. This includes those who receive the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Food Distribution Program on Indian Reservations (FDPIR), or students who are homeless, runaway, migrant, in foster care, or enrolled in Head Start.<sup>10</sup> Students on Medicaid in North Carolina can also be included in a school's ISP beginning in the 2022-2023 school year.<sup>11</sup> Districts can pull this data directly from the North Carolina Department of Public Instruction's (NCDPI) website. NCDPI sources this information from the North Carolina Department of Health and Human Services (NCDHHS).<sup>12</sup>

Despite these eligibility requirements, participation in CEP does not guarantee that a school will receive full federal reimbursement to fund the program. Federal reimbursement rates for the program are identified by multiplying the ISP by 1.6. Therefore, schools, groups of schools, or districts with an average ISP of 62.5% or more can operate CEP with full reimbursement from the federal government. Those schools, groups, and districts with an ISP below 62.5% must cover with non-federal funds any gaps between the cost of the program and federal reimbursement, meaning the program may call for additional financial resources to operate in some schools and districts.<sup>8</sup> Therefore, this threshold incentivizes districts to strategically group schools to reach the highest ISP possible for the greatest number of schools, so more schools can operate the program at no cost. Democrats' Build Back Better bill proposes to increase the federal reimbursement multiplier to 2.5 and lower the ISP threshold for CEP participation to 25% for schools until 2030.<sup>13</sup>

## *Benefits of CEP*

CEP ensures all students have access to nutritious meals twice a day, which has been shown to boost students' academic performance, behavior, and attendance. Beyond the benefits to students, the absence of meal applications reduces a significant administrative burden for school staff, freeing up additional time, effort, and financial resources to invest in other aspects of the school nutrition program. Identifying ways to boost CEP adoption throughout North Carolina could increase the number of schools and districts that realize these myriad benefits.

The academic benefits of CEP adoption have been demonstrated in multiple states. Research in North Carolina found CEP-participating schools saw significant improvements in 5<sup>th</sup> grade science and middle school reading test scores compared to those that were eligible but did not participate.<sup>14</sup> Likewise, a study of students in South Carolina found participation in CEP led to a .06 standard deviation increase on math scores for elementary students. Interestingly, those students eligible for free lunches but no other public assistance programs saw the greatest gains, indicating CEP may be most beneficial for those students that toggle between eligibility and ineligibility for free and reduced price meals.<sup>15</sup>

Studies have also found that increased access to regular nutrition boosts both student behavior and attendance. The same study from North Carolina found that out-of-school suspensions dropped by 1.4 and 2.3 percentage points in middle and high schools, respectively, in CEP-participating schools compared to eligible non-participating schools.<sup>14</sup> Improvement in student behavior associated with CEP adoption may be a direct result of improved student nutrition levels, better school climate, and reduced social stigma and shame around receiving free meals.<sup>16</sup> Moreover, a Wisconsin study found that in a school's second year of CEP implementation, there was a 3.5 percentage point reduction in the number of students who had low attendance, specifically among economically disadvantaged students.<sup>16</sup>

Another one of the most frequently cited benefits of CEP is the reduced administrative burden on school nutrition staff. Schools do need to pull relevant data from NCDPI to demonstrate that they meet the ISP threshold for CEP eligibility, but they only have to do so every four years to remain eligible.<sup>17</sup> Without needing to collect and verify meal applications every year, track student eligibility for free and reduced price meals, nor follow up with parents to collect student meal debt, nutrition staff can focus the bulk of their time on ensuring students receive healthy meals.<sup>18 19</sup> Removing this additional administrative task can also result in cost savings for schools. One research study found that not having to collect meal applications led to an average time savings of 68 minutes per student per year in schools, thereby saving \$29 per student per year.<sup>20</sup>

## *The Need for CEP in North Carolina*

CEP offers a viable policy option to help reduce food insecurity among North Carolina's youth. North Carolina is among the top 10 states for chronic hunger, and 2019 data shows there were 419,470 food insecure children in the state.<sup>21 22</sup> Despite these high numbers, it is estimated that 29% of these children will be ineligible for federal nutrition programs, such as the NSLP, because their income is above 185% of the federal poverty line.<sup>22</sup> Because CEP expands free meals to all students regardless of their ability to pay, this policy could especially help food insecure children who do not traditionally qualify for the NSLP or SBP due to their family's income. Broadly speaking, CEP would ensure all students have reliable access to two nutritious meals every school day, helping to partly alleviate the hunger they may experience at home.

CEP could also particularly support students of color in North Carolina, as more of these students attend schools that are eligible for CEP. Across the country, Black and Latinx students are more likely to attend a school in which more than 75% of the students are eligible for free or reduced price lunch, compared to white and Asian students. This greater reliance on free and reduced price lunch is typically correlated with higher eligibility for CEP.<sup>23</sup> In addition, 2015 research from the USDA found that among 11 states, CEP-participating districts had 39% Black students, while eligible but non-participating districts only had 27%.<sup>24</sup> However, research in North Carolina found that among a sample of CEP-eligible schools, the schools that adopted CEP had fewer students of color compared to those schools that did not participate.<sup>9</sup> This suggests that within the state, schools and districts with higher rates of students of color may be choosing not to adopt the policy.

Participation in CEP has also been found to increase the amount of meals served in North Carolina's public schools, thereby extending the beneficial reach of school meals to more children. Specifically, research found that in eligible North Carolina schools that adopted CEP, 20 additional lunches were served per student per year.<sup>9</sup> These increases can be attributed in part to the fact that the meals are now available to the full school population at no cost, and also because there are lower levels of stigma for kids who may traditionally be singled out due to their participation in the NSLP or SBP.<sup>25</sup> The higher rate of participation not only benefits students, but also increases the amount of federal reimbursements schools receive for school meals, which in turn makes CEP a more financially viable policy.<sup>7</sup> In addition, utilizing costs savings from the economies of scale CEP provides will allow schools to invest in other nutrition initiatives or purchase new and needed equipment.<sup>18</sup>

Despite the need for and benefits of CEP, the North Carolina state legislature provides little funding to support this policy. Pre-pandemic, the state only provided just over 1% of the total funding

for school nutrition programs. The roughly \$7 million in funding from the state pales in comparison to the over \$515 million in federal funding and nearly \$145 million in student meal payments North Carolina schools and districts receive.<sup>26</sup> This lack of funding may preclude schools below the 62.5 ISP threshold, who cannot receive full federal reimbursement, from adopting CEP. It also puts the pressure on schools who do participate in CEP to make sure a high percentage of their students eat school meals so cafeteria operations can experience cost savings from economies of scale – a factor that is key to making the program financially viable.<sup>5</sup>

### *Barriers to Adopting CEP*

Despite the many benefits of CEP to schools in North Carolina and across the country, nationwide only 64.6% of all eligible schools adopted the program in the 2018-2019 school year.<sup>6</sup> Some of the documented barriers to implementation include lack of financial viability, the need for an alternative measure of student poverty levels, and general opposition to using taxpayer dollars to support universal free meals.

Often, schools will not adopt CEP if they do not have the financial resources to pay for the program's costs. As previously mentioned, if a school's ISP is below 62.5, they will not receive full federal reimbursement for all meals served. Therefore, if schools or districts do not have the funds, and the state government and school board do not wish to cover the remaining costs of the program, adoption of CEP could potentially lead to a loss in school or district revenue.<sup>27</sup> Specifically in North Carolina, schools and districts do not receive funding from the legislature for school nutrition programs beyond the required revenue match, leaving districts on their own to fund the gap between the cost of the program and federal reimbursement.<sup>28</sup> In addition, one study found the adoption of CEP in schools that did not receive full reimbursement saw academic declines for some students, indicating that CEP may “worsen resource constraints [in schools] if not fully funded.”<sup>15</sup> As a result, higher ISP levels have routinely been associated with higher rates of CEP adoption in schools and districts across the country.<sup>24</sup>

Another reason schools may be hesitant to adopt CEP is due to concerns over how the absence of individual-level student poverty data may impact their eligibility for federal education funding. Most notably, the data collected from meal applications is traditionally used to rank schools by poverty level to determine the allocation of Title I, Part A funding within districts.<sup>29</sup> If a school adopts CEP, they will need to determine another way to supply this data, which has the potential to impact their ranking and reduce the funding they receive.<sup>30</sup> Though there is not an exact quantification of how many schools this lack of data has impacted, a study by the American Institutes for Research found the adoption of CEP

“degrades the link between student poverty and free and reduced price meal eligibility.”<sup>31</sup> Schools can instead utilize a new survey to collect family income data, but schools cannot use nutrition funding to administer the survey, and the process can add another task to administrators’ and families’ already busy schedules.<sup>27</sup>

Beyond these logistical challenges, some assert CEP wrongly directs taxpayer dollars away from students most in need. A report from the conservative Heritage Foundation opposes grouping schools with low and high ISPs to reach an overall higher average ISP, because it allows schools with lower percentages of low-income students to receive free lunch. As a result, government funding is not targeted to those most in need.<sup>32</sup> The Heritage Foundation adds that while applications for free and reduced price meals may be tedious to administer, it is a critical tool that ensures resources are going to those who need them the most.<sup>33</sup>

Republican legislators in North Carolina have also recently pushed back against requests for increased state funding generally for school nutrition programs. During a February 2022, legislative hearing before the Subcommittee on Use and Distribution of Federal COVID Funding, Rep. Mark Brody (R-Union) said that NCDPI did not have actual data on child hunger, and that it should not be assumed that children in poor households are hungry and therefore need nutrition support. In addition, Rep. Erin Paré (R-Wake) said recent decreased participation in school nutrition programs may suggest fewer students require this kind of support, and so additional funding may not be needed.<sup>34</sup>

### *Challenges from the Pandemic*

Lastly, the COVID-19 pandemic has brought many changes to the way school meals are administered and financed in districts. While challenges associated with the pandemic could jeopardize the continued adoption of CEP in schools, it could also create a precedent to transition to fully funded universal free meals.

Since spring 2020, through waivers provided by the USDA, schools have been able to issue free meals to all students in schools regardless of CEP status or students’ ability to pay.<sup>35</sup> Effectively, these waivers have made universal free meals a reality across North Carolina’s public schools throughout the pandemic. The waivers have been extended through the end of the 2021-2022 school year, but there has not been a decision on whether they will be extended into the coming year, despite proposed legislation extending them.<sup>36</sup>

While these waivers have provided a lifeline to schools and families during the pandemic, the transition back to CEP or the collection of free and reduced meal applications in the coming school year

may inadvertently lead to fewer students receiving school meals. Of primary concern is the decrease in the number of students currently participating in the meal programs throughout the pandemic. In the 2018-2019 school year, nearly 135 million lunches were served, compared to just over 61.5 million as of December of the 2021-2022 school year.<sup>21</sup> Decreasing participation rates will likely make it more difficult for schools to make CEP financially feasible in their schools and districts, particularly as they face rising food and personnel costs due to mounting inflation.<sup>21</sup> In addition, many school nutrition directors are concerned about getting parents accustomed to filling out meal applications again after two years of automatically receiving free meals. Without these completed applications, students in non-CEP schools will not be able to receive free or reduced price meals.<sup>37</sup>

Despite these anticipated challenges, the experience with universal free lunch during the pandemic could provide a useful case study supporting the permanent implementation of this policy. Both California and Maine signed legislation in 2021 to adopt universal free meals for all students, and officials from NCDPI have asked members of the General Assembly to show support for extending the waivers into the coming year and/or expand state funding to support school meals.<sup>38 21</sup> The School Nutrition Association (SNA), a nonprofit that represents members who provide high-quality, low-cost meals to students, has continued to advocate for the extension of the waivers and the expansion of universal school meals to reach all students at no cost.<sup>39</sup> Positive evaluations on the impact of the USDA waivers could lend additional support to these state- and federal-level advocacy efforts.

Though there does exist a large body of research on barriers and complements to CEP adoption on a national level, this research project will specifically seek to identify these as they pertain to the unique experiences of schools in North Carolina. Identifying ways to break down these barriers and adopt best practices to boost CEP implementation at the state and local level will help schools and districts within North Carolina provide free meals to as many children as possible. This will be a particularly important need as schools will likely soon have to transfer off the USDA waivers, and as the cost of food and labor continue to rise.

### **III. Methodology**

The research question was answered using a mixed methods research approach. The first stage of the research consisted of a quantitative analysis of CEP adoption among public schools in North Carolina. The analysis was meant to determine if there was any correlation between CEP adoption and certain characteristics of a school, among CEP-eligible schools. The independent variables used in the

analysis included the school's ISP level, the size of the student body, whether the school had a majority percentage of Black students enrolled, the school's geographic location, and political preferences of the district's residents. The dependent variable in the analysis was whether the school participated in CEP.

The second phase of the research consisted of in-depth, semi-structured qualitative interviews with school nutrition directors and school board members that aimed to identify best practices and resources to boost CEP adoption in North Carolina. The interviews also sought to gather information on corresponding barriers to adopting CEP. Interviewees were chosen based on standout findings and unresolved questions that emerged from the quantitative portion of the study.

### *Quantitative Research*

To engage in the quantitative portion of this research, a dataset was built that included the dependent and independent variables listed previously. The sources used to develop the dataset, and any modifications made to the data, are as follows:

**NCDPI 2018-2019 Annual Notification of LEA CEP Eligibility:**<sup>40</sup> This source from NCDPI included information on the CEP eligibility and participation status of all schools in North Carolina. The relevant variables included in the dataset were the school name; the school's corresponding Local Education Agency (LEA); School ID; ISP Percentage, whether the school was eligible or near eligible to participate in CEP; whether the school was participating in CEP and if it participated as an individual, group, or district; the number of students enrolled in the school; and the number of students enrolled in the corresponding district.

2018-2019 data was used to avoid any confounding effects caused by the pandemic, including lower attendance rates by students and a decline in CEP participation due to the administration of USDA waivers that allowed for the administration of universal free meals. The client's work is focused on traditional public schools, so charter, federal, and residential schools have been removed from the dataset. In addition, alternative public schools or those designated for students with significant disabilities were excluded from the data, as these schools represent unique cases that would not be instructive to the broader dataset on public schools.

In addition, the analysis only focused on schools that would be eligible as an individual school, meaning their own ISP level was 40% or higher. It is possible that schools with ISPs lower than 40% are currently participating or could participate due to strategic grouping with other schools with high ISPs, but this analysis was restricted to schools that would be considered eligible on an individual basis. The

original dataset does include those schools that are considered “near eligible” (30-39.99% ISP) or participate as part of a group even though they are not individually eligible, but this information was just used to inform the selection of interviewees. They were removed for the quantitative analysis.

Using the information available in the dataset, schools were then assigned a code based on their ISP level. Schools with a 62.50-100 ISP were tagged as “high eligibility”; those with a 50-62.49 ISP were tagged as “middle eligibility”; and those schools with a 40-49.99 ISP were tagged as “low eligibility.”

Finally, student enrollment numbers available in the data set were used to classify the size of the school. Schools with 400 students or less were classified as “small”; schools with 401-750 students were classified as “medium”; and schools with 751 students or more were classified as “large.” These classifications were created in part to align with the National Center for Education Statistics’ (NCES) research that found the average public school enrollment in the U.S. is 527 students.<sup>41</sup> Raw district enrollment numbers were also collected from this dataset. For those districts that were missing enrollment numbers, data was substituted from NCDPI’s 2018-2019 Statistical Profile.<sup>42</sup>

**US Department of Education (USDOE) Civil Rights Data Collection:**<sup>43</sup> The percent of Black students in each school was obtained from this resource, and the data was used to create an indicator variable for schools with a majority percentage of Black students. The latest year for which data are available is 2017, but it is unlikely the percentage of Black students in each school changed dramatically between 2017 and the 2018-2019 school year. Moreover, this variable was meant to focus less on the precise number of Black students in the school, and more on whether these students made up a small or large percentage of all students in the school. For schools that were created after 2017, data on student race was collected from NCDPI’s 2018-2019 Statistical Profile.<sup>42</sup> In addition, there were a few schools for which no student demographic data could be found. These schools were kept in the data set but were dropped in analyses looking specifically at the impact of student race on CEP adoption.

**Office of Budget and Management (OMB) Rural-Urban Continuum Codes:** All schools were classified as either “metro” or “nonmetro” based on the 2013 Rural-Urban Continuum Code for the county in which it resides. 2013 is the latest year for which these codes are available. “Metro” counties are those located in metro areas with 1 million people or more; metro areas with 250,000 to 1 million people; or metro areas with fewer than 250,000 people. “Nonmetro” counties are those with an urban population of 20,000 or more, adjacent or not adjacent to a metro area; an urban population of 2,500 to 19,999, adjacent or not adjacent to a metro area; and those that are completely rural or have an urban population less than 2,500 people, adjacent or not adjacent to a metro area.<sup>44</sup>

**New York Times 2016 North Carolina Presidential Election Results:**<sup>45</sup> Because school boards play a role in deciding whether a school or district can adopt CEP, this analysis also sought to understand if political preferences in the district are correlated with CEP adoption. To achieve this, each school was coded as either “Republican” or “Democrat” based on which party won the majority of votes in its county in the 2016 Presidential election.

Since school board leadership sits at the district level, and the large majority of school districts in the state correspond with North Carolina’s counties, county-level presidential voting results can likely be used as a proxy for the political leanings of the school board and larger community. In addition, though school board elections are meant to be nonpartisan, a Brookings Institute study found that over half of school board officials identify as being conservative or liberal, indicating individuals’ votes in local elections could mirror their partisan choices at the national level.<sup>46</sup> 2016 data was used as 2020 election data would not accurately reflect the makeup of boards in the 2018-2019 school year. However, only three counties in North Carolina flipped their majority support from one major party to the other between 2016 and 2020, making the decision to use either of these years likely negligible.<sup>47</sup>

Once this dataset was compiled, cross tabs and regression models were utilized to observe the association of each of the independent variables with a school’s participation in CEP. It is important to note that the variables related to geography, politics, and district enrollment were derived from district-level data, meaning each observation in the dataset is not independent of each other. To avoid the artificial deflation in standard errors that can occur from not using independent observations in a regression model, standard errors in the regression model were clustered by district.

A full description of the dataset can be seen in Appendix A.

### *Qualitative Research*

The results and questions generated by the quantitative analysis guided the selection of school nutrition directors to interview. School nutrition directors work at the district-level to administer school meal programs and policies, including CEP, so they would likely provide the best insight into what challenges and successes their schools face with relation to CEP.<sup>48</sup>

Early results from the quantitative analysis showed that CEP-eligible schools with high eligibility were more likely to adopt the policy than those with medium or low eligibility; CEP-eligible smaller schools were slightly more likely to adopt than eligible medium or large schools; CEP-eligible nonmetro schools were more likely to adopt than eligible metro schools; CEP-eligible schools with a majority

percent of Black students were more likely to adopt than eligible schools that did not have a majority percent of Black students; and CEP-eligible schools in Democratic-leaning counties were more likely to adopt than eligible schools in Republican-leaning counties. Given these results, interviews with school nutrition directors with schools in their districts that possessed these characteristics associated with CEP adoption were prioritized to better learn whether these factors in fact helped contribute to CEP adoption. There was, however, an interest in also learning more from districts with schools that had characteristics associated with lower rates of CEP adoption to better understand if these attributes played a role in a school's decision not to adopt CEP.

While schools with these indicators guided the initial interview outreach, a handful of interviews also prioritized speaking to nutrition directors leading schools with atypical CEP-adoption trends. For example, as mentioned previously, past research on CEP has found that higher ISP levels are consistently associated with higher rates of CEP adoption. In addition, an ISP level of 62.5% is the threshold schools must reach to receive full federal reimbursement for the program. As a result, there was an interest in learning more from nutrition directors with schools in their district that were below an ISP level of 62.5% but still participated, and/or had schools with ISP levels above 62.5% but chose not to participate. In addition, almost all participating schools participated either as part of a district or as part of a group, with just under 3% of schools participating as individuals. Therefore, there was an interest in learning how these individual schools successfully participated in CEP without the support from or coordination with other schools or their district at large. Lastly, there was an impetus to speak with school nutrition directors that did not have any eligible schools in their district to learn if CEP adoption was at all an objective for their schools. Positive responses would indicate there is an appetite across the state for CEP adoption, even among schools that have lower ISPs, and therefore may be a lower-poverty district.

A summary of interviewees, relevant characteristics of schools in their district, and why they were a subject of interest for the interviews are included in Table 1.

**Table 1: Interviews Conducted, with Accompanying Relevant School Characteristics**

<b>Interviewee</b>	<b>District</b>	<b>Geography</b>	<b>Size of Schools in District</b>	<b>Presence of Majority Black School</b>	<b>Political Preference</b>	<b>Interest in Interviewing (Based on 2018-2019 Data)</b>
<b>Tiwana Smallwood, Director of School Nutrition</b>	Bertie	Nonmetro	Medium and small	Yes	Democrat	All schools participating, even medium and near-eligible
<b>Imer Smith, Director of Child Nutrition</b>	Brunswick	Metro	Most medium; some large and small	No	Republican	Schools in district recently transitioned to CEP
<b>Melissa Albright, Child Nutrition Director</b>	Carteret	Nonmetro	Most medium and small, some large	No	Republican	No schools participating
<b>Catherine Beam, Executive Director of School Nutrition Services</b>	Charlotte-Mecklenburg	Metro	Most large and medium; some small	Yes	Democrat	All low- and medium-eligibility and some near-eligible schools participating in CEP  <i>*Note: only responded to questions via email</i>
<b>Beth Maynard, Executive Director, Child Nutrition Services</b>	Cumberland	Metro	Large, medium, and small	Yes	Democrat	Some medium- and low-eligibility schools participating
<b>Ruth McDowell, Child Nutrition Director and President Elect of SNA of NC</b>	Edgecombe	Metro	Most small; some large and medium	Yes	Democrat	All schools participating, even low- and medium-eligibility
<b>Denise Moody, Child Nutrition Director</b>	Graham	Nonmetro	Small and medium	No	Republican	No schools eligible or participating
<b>Alison Francis, Director of School Nutrition</b>	Haywood	Metro	Most medium; one large and some small	No	Republican	All low-eligibility schools participating

<b>Dana Edwards, Director of School Nutrition and President of SNA of NC</b>	Johnston	Metro	Most medium; some large and small	No	Republican	CEP schools participating as individuals
<b>Amy Stanley, Director of Child Nutrition</b>	New Hanover	Metro	Most medium and small; some large	Yes	Republican	Some low- and medium-eligibility schools participating; county swung politically from R in 2016 to D in 2020
<b>Kelly Green, School Nutrition Director</b>	Randolph	Metro	Most medium; some small and one large	No	Republican	Just one medium-eligibility school participating as individual
<b>Crystal Hunt, Child Nutrition Director</b>	Robeson	Nonmetro	Most medium; some large and small	Yes	Republican	All schools participating, even low- and near-eligibility
<b>Richard Jacobs, Child Nutrition Director</b>	Scotland	Nonmetro	Most medium; some large and small	Yes	Democrat	All schools participating, even low-eligibility one; county swung politically from D in 2016 to R in 2020
<b>Makayla Mabry, Director of Child Nutrition</b>	Stanly	Nonmetro	Medium and small	Yes	Republican	All medium-eligible schools participating, including one as an individual
<b>Jennifer Brown, Director of School Food Service</b>	Swain	Nonmetro	Medium and small	No	Republican	Just one low-eligibility school participating as individual
<b>Daniel Harris, Director of Child Nutrition</b>	Warren	Nonmetro	Most small; one medium	Yes	Democrat	All schools participating, even low- and near-eligibility
<b>Jayme Robertson, School Nutrition Director</b>	Yadkin	Metro	Medium and small	No	Republican	No schools participating, but some are eligible

In addition to interviews with school nutrition directors, there was an interest in speaking with members of boards of education where possible, as these entities often make decisions regarding the funding for CEP. Due to constraints on time, outreach to board members across the state was not feasible, but interviews were conducted with **Heidi Carter**, a member of the Durham Public Schools Board of Education from 2004-2016, and **Rev. Raymond Privott**, a current member of the Edgecombe County Public Schools Board of Education.

Finally, **Rachel Findley**, an Assistant Professor of Food and Nutrition at Meredith College and former Director of Child Nutrition Services for Johnston County, was also interviewed. A frequent advocate for school meals on Capitol Hill, Rachel shed light on the political challenges surrounding CEP adoption.

A copy of the interview protocol can be seen in Appendix B.

## IV. Results

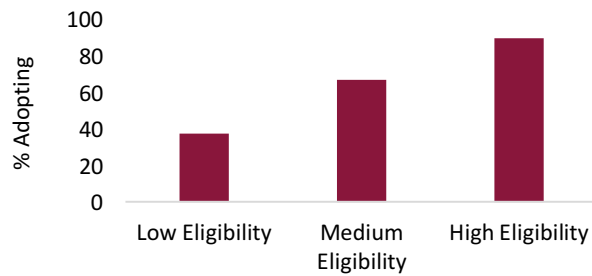
### *Quantitative Analysis*

The quantitative analysis finds that a school's ISP level, both as a continuous and categorical variable, is the greatest predictor of its participation in CEP, even when controlling for other variables. A majority Black enrollment in a school, Democratic political preferences, and location in a nonmetro district are also positively associated with CEP adoption, but they do not have as great of an impact as ISP level. In particular, much of the impact of a majority Black student population on CEP adoption can be explained by this variable's correlation with higher ISP levels, as more than half of schools with a majority Black student population are high eligibility. In addition, while presence of a majority Black student population, Democratic political preferences, and nonmetro geography do positively influence CEP adoption, these variables do not have a differential impact across ISP levels. Finally, there is a negligible association between CEP participation and a school's enrollment and the district's enrollment.

#### **1. ISP level is a school's greatest predictor of CEP participation**

Consistent with findings from other researchers, the analysis reveals that eligible schools with higher ISPs consistently adopt CEP at higher rates than those with lower ISPs. As seen in Figure 1 below, while just over 37% of low-eligibility schools in the dataset adopted CEP, almost 67% of medium-eligibility schools and nearly 90% of high-eligibility schools adopted CEP.

**Figure 1: High-Eligibility Schools Adopt CEP at Higher Rates than Low- or Medium-Eligibility Schools**



Similarly, a simple regression model looking at the association between a school’s ISP as a continuous variable and CEP participation finds that a 1.0 percentage point increase in the ISP of an eligible school leads to a 1.6 percentage point increase (SE=.23) in the likelihood a school will adopt CEP. This finding is statistically significant at the .01 level. These findings continue to hold up even when accounting for

**Table 2: Impact of ISP (Continuous) on Participation**

	<i>Coefficient</i>	<i>SE</i>
<b>ISP</b>	.0141***	.0025
<b>Enrollment</b>	-.0001	.0001
<b>Majority Black</b>	.0676	.0559
<b>Democrat</b>	.1693**	.0795
<b>Nonmetro</b>	.1342*	.0751
<b>Constant</b>	-.2661	.1284

\*Statistically significant at .10 level  
 \*\*Statistically significant at .05 level  
 \*\*\* Statistically significant at .01 level

other variables. A regression model looking at the association between ISP as a continuous variable and participation finds that a 1.0 percentage point increase in the ISP level leads to a 1.4 percentage point increase in the likelihood the school will adopt CEP, holding constant number of students enrolled, racial makeup of the student population, county political preference, and geographic location. This effect is statistically significant at the .01 level, as seen in Table 2.

This effect is similar when looking at the association between ISP level as a categorical variable and participation, and while holding constant the other

variables. Using medium-eligibility schools as the comparison group, high-eligibility schools are almost 18 percentage points more likely to adopt CEP, while low-eligibility schools are nearly 27 percentage points less likely, as seen in Table 3.

As represented in both tables, the coefficients on the control variables remain relatively consistent across both regression models. This indicates that the relationship between any of the control variables and CEP participation is not related to the way in which ISP

**Table 3: Impact of ISP Level (Categorical) on Participation**

	<i>Coefficient</i>	<i>SE</i>
<b>High Eligibility</b>	.1776***	.0483
<b>Low Eligibility</b>	-.2696***	.0591
<b>Enrollment</b>	-.0001	.0001
<b>Majority Black</b>	.0956*	.0517
<b>Democrat</b>	.1495*	.0819
<b>Nonmetro</b>	.1238	.0768
<b>Constant</b>	.5956	.0844

\*Statistically significant at .10 level  
 \*\*Statistically significant at .05 level  
 \*\*\* Statistically significant at .01 level

as a continuous variable and ISP level as a categorical variable are measured.

## **2. Presence of a majority Black student population does positively impact CEP adoption, but its influence is mitigated by school ISP levels**

The presence of a majority Black student population in a school certainly has an association with positive adoption of CEP, though it is not as strong as the association with a school's ISP. A cross tab finds that almost 86% of eligible schools that have a majority Black student population participate in CEP. Comparatively, just over 56% of eligible schools without a majority Black student population participate in CEP. A simple regression model not controlling for other variables also shows that CEP-eligible majority Black schools are 29 percentage points (SE=5.2) more likely to adopt CEP than CEP-eligible schools who do not have a majority Black population, a finding that is statistically significant at the .01 level. This finding aligns with USDA research that found CEP-eligible participating districts have more Black students than non-participating districts.<sup>24</sup> It also suggests that research from UNC that found CEP participating schools have fewer students of color is likely influenced by non-participating schools having higher rates of Asian and/or Hispanic students.<sup>9</sup>

However, the impact of a majority Black student population begins to wane when other variables are considered. As seen in Table 2 above, in the regression model using ISP as a continuous variable, eligible majority Black schools are only 6.8 percentage points more likely to adopt CEP than eligible non-majority Black schools, and this finding is not statistically significant. In Table 3, in the regression model using ISP level as a categorical variable, CEP eligible schools with a majority Black student population are 9.6 percentage points more likely to adopt CEP than eligible schools without a majority Black student population. This effect is statistically significant at the .10 level, but is a sharp decrease from the 29 percentage point positive effect of the presence of a majority Black student body found in the simple regression model that did not include the control variables. The effect of being a majority Black school on CEP participation gets smaller when including these other predictors because the regression model now shows just the impact of being a majority Black school on CEP, without any confounding effects from other variables. These results suggest the independent effect of being a majority Black school is smaller than originally anticipated, and the large coefficient seen in the regression model without the control variables was a result of majority Black schools being closely associated with another variable in the model that has a strong effect on CEP participation – the ISP. This can be substantiated with a simple cross tab, which finds that over half of majority Black schools have a high-eligibility ISP, compared to just under 26% of non-majority Black schools.

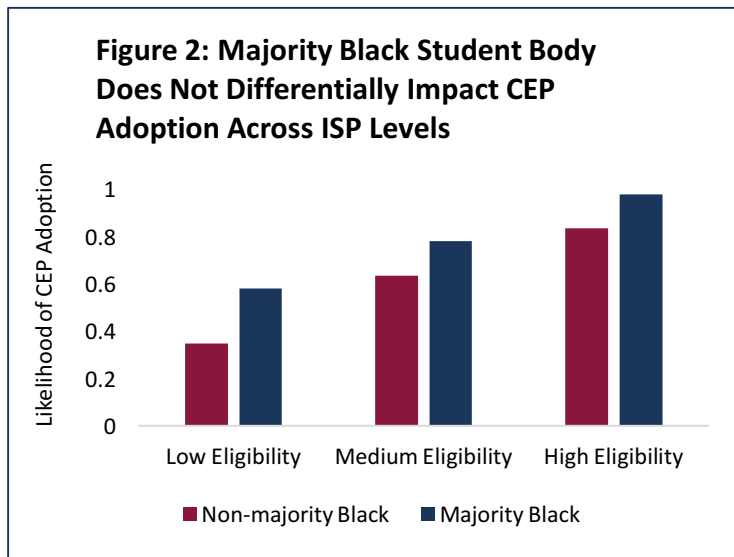
But, when the continuous variable of percent Black students enrolled in the school is used instead of the categorical variable of presence of a majority Black student population, the impact of these students does become much more apparent. For example, in a regression model using ISP and percent Black students as continuous variables, and while controlling for other variables, for each additional percentage point of Black students enrolled in a CEP-eligible school, the school’s likelihood of adopting CEP increases by .41 percentage points (SE=.16). This finding is statistically significant at the .01 level. This suggests that it is less the presence of a majority percentage of Black students in a school that impacts CEP adoption, but a higher share of Black students overall.

Finally, looking at the effect of the interaction of a school’s ISP level with the presence of a majority Black student population, the analysis finds that the presence of a majority Black student body does not have a statistically significant varying impact on CEP adoption for schools of different ISP levels. As seen in Table 4, non-majority Black medium-eligibility schools are almost 29 percentage points more likely to adopt CEP than non-majority Black low-eligibility schools, and non-majority Black high-eligibility schools are nearly 49 percentage points more likely to adopt CEP than non-majority Black low-eligibility schools. Both effects are statistically significant at the .01 level. Also, among low-eligibility schools, majority Black schools are more than 23 percentage points more likely to adopt CEP compared to non-majority Black schools. These findings align with previous results. However, when looking at the interaction between a school’s ISP level and the presence of a majority Black student body, there is not a statistically significant result. This means that while the presence of a majority Black student body does boost the likelihood of CEP adoption, it does not have a varying effect among schools of different eligibility levels.

**Table 4: Impact of Majority Black Student Population Interacted with ISP Level (Categorical)**

	<i>Coefficient</i>	<i>SE</i>
<b>Majority Black</b>	.2334*	.1264
<b>High Eligibility</b>	.4875***	.0847
<b>Medium Eligibility</b>	.2850***	.0670
<b>Majority Black Interacted with High Eligibility</b>	-.0916	.1383
<b>Majority Black Interacted with Medium Eligibility</b>	-.0872	.1321
<b>Constant</b>	.3466	.0608

\*Statistically significant at .10 level  
 \*\*Statistically significant at .05 level  
 \*\*\* Statistically significant at .01 level



This is also visually represented in Figure 2. The graph clearly shows that the presence of a majority Black student body has a positive impact on CEP adoption, independent of ISP level. However, looking at the non-majority Black school and majority Black school bars for medium-eligibility schools, it appears that the gap between these bars is very similar to that between the high-eligibility bars. This shows that the

presence of a majority Black student body does not differentially impact medium eligibility versus high eligibility schools. Looking at the graph again, it does appear that there may be a comparatively slightly larger gap between the low-eligibility bars, which could indicate that the presence of a majority Black student population has a greater impact on low-eligibility schools. However, when a separate regression is run looking specifically at the interaction between majority Black and low eligibility, the coefficient on the interaction term is not statistically significant, and so it cannot be concluded that the presence of a majority Black school has a differential impact on low-eligibility schools.

**3. Democratic-leaning districts have a higher likelihood of adopting CEP and geography also has a small impact, but these relationships show ISP is still greatest predictor of adoption**

The other two variables that appear to have an impact on CEP participation are politics and geography. As seen in Table 2, in the regression using ISP as a continuous variable and holding the other variables constant, CEP-eligible schools in Democratic leaning districts are roughly 17 percentage points more likely to adopt CEP than those in eligible Republican leaning districts. CEP-eligible schools in nonmetro districts are more than 13 percentage points more likely to adopt CEP than those eligible in metro districts. These findings are statistically significant at the .05 and .10 levels, respectively. In the model using ISP level as a categorical level, schools in Democratic leaning districts are roughly 15 percentage points more likely to adopt CEP than those in Republican leaning districts, at a significance level of .10. The coefficient on nonmetro is no longer statistically significant in this model.

Looking at the interactions of these variables with ISP levels, the analysis first reveals that a school’s location in a Democratic leaning county does not affect CEP participation rates differentially across ISP levels, as the coefficient on the interaction terms are not statistically significant. Interestingly,

<b>Table 5: Impact of Politics Interacted with ISP Level (Categorical)</b>		
	<i>Coefficient</i>	<i>SE</i>
<b>Democrat</b>	.1613	.1518
<b>High Eligibility</b>	.5298***	.0864
<b>Medium Eligibility</b>	.2783***	.0705
<b>Democrat Interacted with High Eligibility</b>	-.0552	.1602
<b>Democrat Interacted with Medium Eligibility</b>	.0156	.1255
<b>Constant</b>	.3178	.0655

\*Statistically significant at .10 level  
 \*\*Statistically significant at .05 level  
 \*\*\* Statistically significant at .01 level

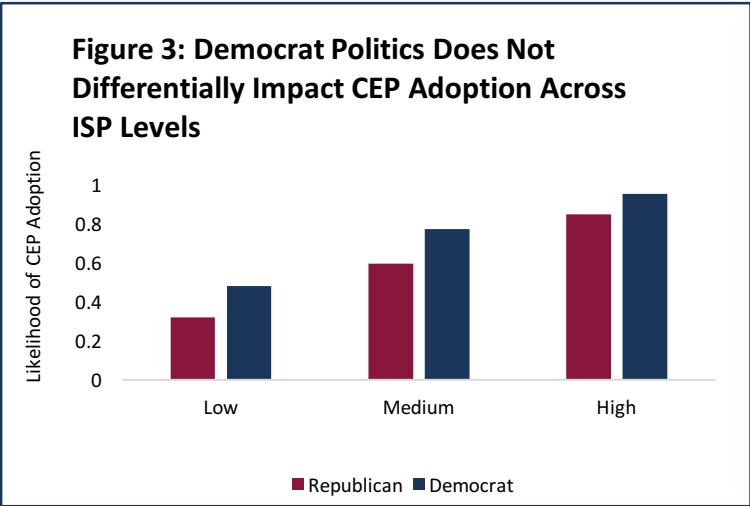
this model also shows that there is not a statistically significant difference in CEP adoption for schools in Democratic and Republican leaning districts among those that are low eligibility. This indicates that the effect of ISP level is a much stronger predictor of CEP than the political leanings of the school’s county, again providing evidence that ISP level is the greatest factor influencing CEP adoption.

These findings can also be seen visually in Figure 3, which shows that eligible schools in Democratic-leaning

counties clearly have higher rates of CEP adoption compared to those in Republican-leaning counties. However, the figure also shows that the positive impact of Democratic politics on CEP adoption does not vary in magnitude across ISP levels, given that the gaps between the Republican and Democrat bars are similar across all three ISP levels. A regression looking at the interaction between Democrat and low-eligibility schools confirms that

Democratic politics do not have a differing impact on low-eligibility schools, as the coefficient on the interaction is not statistically significant.

When performing the same analysis interacting nonmetro with the different ISP levels, similar results are found. As seen in Table 6, the regression does not find a statistically significant



<b>Table 6: Impact of Geography Interacted with ISP Level (Categorical)</b>		
	<i>Coefficient</i>	<i>SE</i>
<b>Nonmetro</b>	.1602	.1356
<b>High Eligibility</b>	.5434***	.0962
<b>Medium Eligibility</b>	.3261***	.0716
<b>Nonmetro Interacted with High Eligibility</b>	-.1057	.1453
<b>Nonmetro Interacted with Medium Eligibility</b>	-.1195	.1220
<b>Constant</b>	.3274	.0874

\*Statistically significant at .10 level

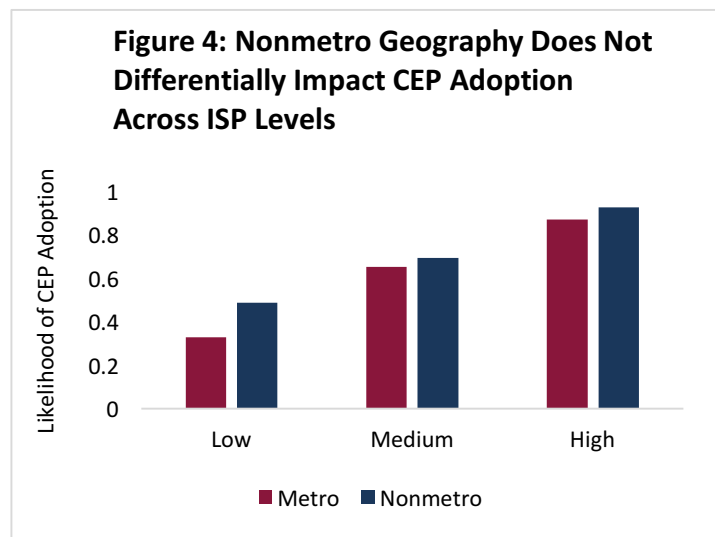
\*\*Statistically significant at .05 level

\*\*\* Statistically significant at .01 level

coefficient on the interaction between nonmetro and high eligibility and nonmetro and medium eligibility. This means that a school’s nonmetro geography does not impact a school’s likelihood of adopting CEP differently across these ISP levels. Similarly, there is not a statistically significant coefficient on nonmetro, meaning among low-eligibility schools, there is not a statistically significant difference in the likelihood of adoption between metro and nonmetro

schools. Again, this emphasizes that ISP level is a much greater predictor of CEP participation than geography.

Finally, these findings can also be seen visually in Figure 4, which shows that nonmetro geography has just a small positive impact on CEP adoption, which earlier regressions also found. The visual does show that potentially nonmetro geography could have a greater positive impact on CEP adoption in low-eligibility schools, given that the size of the gap between the metro and nonmetro bars for low-eligibility schools is larger than that for the medium- and high-eligibility schools. However, a regression looking at the interaction between nonmetro and low-eligibility schools finds no statistically significant effect on this coefficient, meaning nonmetro geography does not have a varying impact on low-eligibility schools.



#### **4. School and district size do not appear to have a great impact on CEP adoption**

As seen in Tables 2 and 3, student enrollment as a continuous variable does not have a practically or statistically significant impact on CEP participation. This finding remains consistent when substituting the categorical enrollment variables of small, medium, and large for the continuous enrollment variable. In a regression model using ISP as a continuous variable and large schools as the comparison group, small schools are a little more than 3.0 percentage points (SE=7.8) more likely to adopt CEP, and medium schools are just under .20 percentage points (SE=6.1) more likely. However, neither of these results are statistically significant.

When district enrollment numbers are substituted for individual school enrollment numbers in the regression model using ISP as a continuous variable, the results are roughly the same. Though the coefficient on district enrollment is statistically significant at the .05 level, the coefficient itself is .00000252, meaning that for each additional student enrolled in a district, a school is .000252 percentage points more likely to participate in CEP. This is a finding so small as to not be practically significant.

#### *Qualitative Analysis*

In alignment with the findings from the quantitative analysis, the interviews with school nutrition directors and board members revealed that a school's ISP level, which determines the amount of federal reimbursement they receive for the program, was one of the greatest drivers of CEP participation. Interviews also reinforced the findings that schools with majority Black students and those located in Democratic-leaning communities are more likely to adopt CEP. Nutrition directors shared that those living in majority Black communities are more aware of the social challenges their students may be facing, and therefore put a greater priority on school nutrition as one component to foster academic success. Similarly, directors noted that CEP aligns more with Democratic party values of supporting social service programs. Lastly, interviews also confirmed that there is little relationship between the size of a school and its geographic location on CEP participation.

In addition to the confirmation of findings from the quantitative analysis, the interviews also highlighted barriers and complements to CEP participation that the data alone could not reveal. One of the main barriers shared was a hesitancy by district leadership to adopt CEP if not all schools in their district could participate. Directors also explained how higher personnel and food costs, in addition to declining participation in school meal programs during the pandemic, has made it more difficult to fund CEP and other child nutrition programs. Commonly cited complements of CEP adoption included robust

advocacy and communications efforts by school nutrition directors that emphasize the importance of CEP, the building of collaborative relationships among key district stakeholders to make collective decisions on child nutrition initiatives, and a strong focus on meeting student meal preferences to boost participation in school meals.

Beyond identifying complements and barriers to CEP adoption, the interviews also shed light on the challenges nutrition directors anticipate for next school year as they return to CEP or traditional school meal applications after transitioning off USDA waivers for universal free meals. In addition, directors shared their hopes for using CEP as a stepping stone to the implementation of universal free school meals broadly.

**1. There is widespread interest in CEP adoption across North Carolina, but there is sometimes resistance when not all schools in a district can participate**

The nutrition directors interviewed unanimously agreed that they wished all schools in their district could participate in CEP. Denise Moody, Child Nutrition Director of Graham County Schools, shared, "I really wish we could offer CEP. I think that could really benefit all of our children and our county, you know, in terms of putting more money back out into the county." Similarly, Cathy Beam, Executive Director of School Nutrition Services at Charlotte-Mecklenburg Schools, agreed, "Of course, everybody would like all students to eat at no charge at every school."

When asked about the benefits of CEP to their schools and community, nutrition directors often noted factors commonly cited in existing literature on CEP. This included support for food insecure families, reduced stigma for students traditionally receiving free or reduced priced meals, lower administrative burden on staff, and less school debt caused by unpaid meal charges. Of note, a few nutrition directors highlighted

*"I really wish we could offer CEP. I think that could really benefit all of our children and our county, you know, in terms of putting more money back out into the county."*

- Graham County Schools

that CEP can be particularly beneficial to students who just miss eligibility for free and reduced price meals under the NSLP and SBP. Directors shared that because school meal applications only account for gross income, they do not consider tax, medical expenses, or housing cost burdens families may also be facing. In addition, the cost of reduced price meals can still be burdensome to low-income families, particularly as inflation continues to outpace wages. Some nutrition directors also noted that CEP has allowed schools to implement more innovative breakfast programs, which can have wide ranging

benefits for students. For example, in Cumberland County Schools, serving breakfast in the classroom has led to reduced tardies and has given teachers more time to spend with their students.

Despite the wide ranging support for CEP, some districts have declined to adopt CEP for eligible schools if not all schools in their district can participate. Nutrition directors said lack of uniformity in CEP adoption across the district can lead to confusion if siblings' schools or schools near each other have differing CEP adoption statuses. One director also noted that lack of complete CEP adoption in a district can stigmatize those schools that are enrolled in the program. Still, other districts believe the benefits of CEP outweigh the confusion or challenges stemming from lack of universal CEP adoption, and getting school boards to support CEP adoption even when all schools in a district are not able to participate should be a priority.

**2. Financial viability is a key driver of CEP adoption, aligning with quantitative findings that ISP level strongly influences participation**

Districts that did not adopt CEP in part or in whole frequently cited financial viability as the main barrier to adoption. Cathy Beam of Charlotte-Mecklenburg Schools noted that their decision to only

*“I would never ever say a school is CEP unless I got 100% clear that the school is going to eat free. I wouldn't want to rely on the school district to have to pay the other part of that percentage.”*

- Brunswick County Schools

adopt CEP in a portion of their schools was because it was “all the budget could afford,” and that their ISP data was the greatest driver of this conclusion. Nutrition directors shared that if schools or districts had to pick up the tab for the costs of CEP not covered by the federal government, it could have a devastating effect on district finances, given the high volume of students eating school meals. Denise Moody of Graham County Schools said her district’s ISP level is only 43% because there is low participation in SNAP, as many families do not apply because they only qualify for \$10-\$15 in benefits and do not realize participation in SNAP would make them eligible for free lunch and boost the district’s ISP level.

Because of this deflated ISP, she noted that CEP could cost the district upwards of \$200,000, and that the district already struggles to pay existing expenses. Imer Smith, Director of Child Nutrition at Brunswick County Schools, added, “I would never ever say a school is CEP unless I got 100% clear that the school is going to eat free. I wouldn't want to rely on the school district to have to pay the other part of that percentage.”

And now with the rising cost of labor and supplies, in addition to fewer students eating school meals due to increased absences from COVID, districts that once had some cushion in their school nutrition budgets are becoming more concerned about their ability to pay for CEP and child nutrition programs generally. Kelly Green, School Nutrition Director of Randolph County Schools, noted that it is important that the nutrition budget have some “wiggle room” in it, in case old equipment needs to be replaced, or there is a government shutdown and federal reimbursements do not come through. Similarly, Jayme Robertson, School Nutrition Director of Yadkin County Schools, which has no schools adopting CEP, said her program currently cannot take a loss. She noted that if her equipment fails and she cannot pay for replacements, no one will be getting school meals regardless of their ability to pay.

As expected, schools that are receiving full federal reimbursement for the program did not see finances as a barrier, and they did not think that further government funding would have an impact on their ability to implement the program. Daniel Harris, Director of Child Nutrition at Warren County Schools, noted that school finances do not act as a barrier so long as the nutrition director makes financially secure decisions. In his perspective, this means having an ISP of at least in the 70s. In Scotland County Schools, where the average ISP for all participating schools was 75.5% in the 2018-2019 school year, participation in CEP actually bolstered school finances because so many children participated. Richard Jacobs, Scotland’s Child Nutrition Director, estimates that the program saved the community over \$250,000 because parents do not have to pay for meals anymore. Similarly, in Cumberland County Schools, Beth Maynard, Executive Director of Child Nutrition Services, said they have not experienced any financial challenges with the program, but admitted that when CEP goes up against other priorities in a district, “it doesn’t win the battle.”

In addition, the impact of ISP level on CEP participation was also emphasized by districts who adopted the policy following an emergency. For example, over the past few years, several coastal districts were hit by hurricanes. This resulted in residents receiving pandemic EBT, which boosted the districts’ ISP levels. Melissa Albright, Child Nutrition Director of Carteret County Schools, shared that if it were not for the hurricane, her district would not be able to qualify for CEP, and their board only willingly adopted the policy after the natural disaster. Many of the districts that participate in CEP following a hurricane anticipate that their ISP numbers will not be as high once it is time to recertify, and that they may not be able to continue with the program.

### **3. There appears to be a high prioritization for CEP and universal free meals in communities of color, despite the cost of the program**

Districts with a high proportion of students of color, particularly Black students, seem to be more willing to prioritize CEP above other needs. This aligns with the findings from the quantitative analysis that higher Black student enrollment does positively impact CEP adoption. Specifically, in Edgecombe County Schools, in which just four schools do not have a majority Black student population, all eligible schools participate in CEP, even though the average ISP for all participating schools in the 2018-2019 school year was just under 51% and so the district did not receive full federal reimbursement for the program. In addition, the school board willingly pays for free meals at the district's early college high school, even though it does not qualify for CEP. Rev. Raymond Privott, a member of the Edgecombe County School Board, noted, "It didn't take a lot to persuade [the school board] that [CEP] was something that we needed." He also added that the community was okay with the board taking on the additional expense, as it was a closely-knit community that cared about the wellbeing of the students. Ruth McDowell, Child Nutrition Director of Edgecombe County Schools, added that each year a group of school officials meets to discuss financial priorities for the coming school year, and each time, CEP outweighs other needs on the district's agenda. She also uses sales from a la carte programs to help cover the costs of CEP.

Similarly, in Bertie County Schools, where all the schools are majority Black and the average ISP for all participating schools in 2018-2019 was just over 59%, Tiwana Smallwood, the Director of School Nutrition, said the board's number one priority is the students, and they would support anything that helps the children. In Public Schools of Robeson County, where the average ISP for participating schools was 44% in the 2018-2019 school year, all eligible schools are included in CEP, and the district also pays for the early college to have free meals despite them not qualifying for CEP. Robeson has just four majority Black schools, but the county is characterized by its large proportion of Native American students from the Lumbee Tribe.

### **4. Though ISP level was most frequently cited as the greatest driver of CEP participation, some nutrition directors acknowledged the influence of other variables included in the quantitative analysis**

Many directors expressed that ISP level and the demonstrated need of students within the district is the main driver of CEP adoption, rather than the other variables considered in the quantitative analysis. Daniel Harris of Warren County Schools shared that CEP is mainly driven by the economic breakdown of families among and within school districts, adding that high rates of Medicaid and SNAP

participation would be indicators a district is lower-income and would likely qualify for CEP. Likewise, Beth Maynard of Cumberland County Schools said that, “CEP is strictly numbers driven.”

However, when prompted about politics, responses were mixed as to whether political influence was a factor impacting CEP adoption. Richard Jacobs of Scotland County Schools said he did not think politics played a role, adding, “The reason the board had no problem adopting [CEP] was because it was the best thing for the community.” Crystal Hunt, Child Nutrition Director at Public Schools of Robeson County,

*“The reason the board had no problem adopting [CEP] was because it was the best thing for the community.”*

- Scotland County Schools

similarly expressed, “I don’t see why anybody would be against [CEP]. Why wouldn’t you want anything that benefits the children?” Jennifer Brown, Director of School Food Service at Swain County Schools, also noted that county commissioners and school boards are not likely weighing the political implications of CEP, but rather they are not as educated about the benefits of CEP compared to school staff. This may make them more hesitant to adopt the policy. On the other hand, some agreed that CEP aligned more with Democratic support for public services. Jayme Robertson of Yadkin County Schools, asserted, “I definitely do feel like it’s political,” adding that liberal parties would value resources going to students, while Republicans would lament that tax dollars are being spent. Similarly, Ruth McDowell of Edgecombe County Schools shared that because Democrats are typically located in poorer districts, they better understand the nutrition needs of their students, and do not see CEP as a handout as Republicans might. Finally, Rachel Findley, a current assistant professor in food and nutrition at Meredith College who has worked with politicians around the push for school meals, noted that feeding children should be a bipartisan effort. She added that while she has never experienced pushback on the need for universal free meals from any political party, some politicians ultimately vote against the policy and instead align with their party’s larger political ideologies and values.

Opinion around the influence of the racial makeup of the student body on CEP adoption was also mixed. Many directors noted that it is not students’ race that has an impact on CEP adoption, but rather their income. Crystal Hunt of Public Schools of Robeson County said that because they have a large population of Native American students, it may seem that these students are driving CEP adoption. However, she believes this result is more of a correlation than a causation. However, in Edgecombe County Schools, where there is a significant population of Black students, both the School Nutrition Director and School Board Chair agreed that race played a factor in their district’s adoption of CEP. Ruth McDowell shared that because Black individuals tend to be more food insecure than white individuals,

and also do not make as much money, this may have impacted their decision to adopt CEP. Rev. Raymond Privott asserted that racial makeup has definitely impacted CEP adoption. In his majority Black district he said there are high rates of poverty, unemployment, and single parents, and so residents need the additional support. It is important to note that both individuals mentioned socioeconomic factors the Black population disproportionately faces as a result of a historic discrimination. Therefore, it is not necessarily the race of the students that is impacting CEP adoption, but rather the poor socioeconomic conditions imposed on these groups by repeated discriminatory treatment. This assertion is also supported by the strong correlation between higher ISP levels and majority Black schools identified in the quantitative analysis.

Finally, few directors thought the size or geography of a school influenced CEP adoption, as was also found in the quantitative analysis. However, some anecdotes shared by a handful of directors may warrant further investigation. Jayme Roberston of Yadkin County Schools said she did not think it was necessarily the size of the school that influences CEP adoption, but rather the size of the district. She did also note that a smaller district does not necessarily make it easier to administer the program. Ruth McDowell of Edgecombe County Schools also added that smaller districts may not be as “fluent” in this work compared to larger districts, and that the pay for staff in larger districts is higher, thus giving them more expertise and resources to implement CEP. Lastly, with regard to geography, Makayla Mabry, Director of Child Nutrition at Stanly County Schools, said that most of her CEP schools are located in the more metro part of the county where there is higher poverty and more low-income housing. She said these socioeconomic factors may drive schools in urban cores to be more likely to adopt CEP. In contrast, however, Jayme Roberts of Yadkin County Schools said that in rural, smaller schools there is more of a community feel where school meal participation is part of the culture, thereby making it easier to garner support for CEP. She said that in more metro areas, there can be longer lines for school meals, and it may not be socially acceptable to eat school lunch. She also noted that high schoolers in particular have more options for fast food that can draw them away from eating school meals, making it more difficult to successfully implement CEP.

## **5. Sharing information and building relationships with key stakeholders are crucial strategies to build support for CEP adoption**

Many of the nutrition directors that successfully adopted CEP in their districts emphasized the need to clearly and concisely communicate to board members, administration, and even teachers and parents about the need for and benefits of CEP. Imer Smith of Brunswick County Schools said she faced

a hurdle in getting parents and teachers to accept that some schools in the district are on CEP, while others are not. "It took me a lot of communicating to people, but we finally made it work," she noted. Jennifer Brown of Swain County Schools also said that when she was going through the process of gathering district support for CEP, she engaged in a lot of advocacy with stakeholders and highlighted research findings that kids who are well fed perform better in school.

Overwhelmingly, these directors noted that gaining the support of the school board was a critical component to successfully adopting CEP. Rachel Findley noted that when she worked at Johnston County Schools as the Director of Child Nutrition Services, one of her greatest barriers to adopting CEP was that she could not get the board to agree with the additional cost of the program. Jayme Robertson at Yadkin County Schools highlighted the influence of the school board, saying, "The more of [the school board's] ear that you have, the more successful your [nutrition] program will be in all aspects, not just CEP." Richard Harris of Warren County Schools also noted the explicit importance of communicating dollar amounts and data to garner school board support. He said if the board sees evidence that CEP is a net positive to the school community, they likely will have no choice but to adopt the policy.

*"The more of [the school board's] ear that you have, the more successful your [nutrition] program will be in all aspects, not just CEP."*

- Yadkin County Schools

Nutrition directors in particular that had ongoing relationships with and trust from their boards seemed to have an easier time garnering support for CEP. Richard Jacobs of Scotland County Schools noted that his staff had a good rapport with principals and the school board, and so once he demonstrated that CEP would not cost the county anything, the district readily agreed to

adopt the policy. In Durham County Public Schools, former board member Heidi Carter noted that she does not even recall taking a vote on whether to adopt CEP, as it was an issue they trusted to the skillset and expertise of the nutrition director. However, she did note that if the program required additional funding, the board would have to make a vote on whether to incur this additional expenditure. Lastly, Jennifer Brown of Swain County Schools said that given the complexity of the CEP reimbursement process, the school board trusted her to make the right decision for the district. "The school board has got to trust the school nutrition director pretty well, because, like I said, this is a hard concept to understand."

In addition, a few school districts noted that decisions to adopt CEP were made by a group of stakeholders, highlighting the power of coordination to support school nutrition. For example, in Edgecombe County Schools, Ruth McDowell shared that they have a CEP Coordinating Committee with

representation from various programs across the district. Together, these individuals discuss how funding for CEP may impact other priority areas, such as technology or Title I allocations. They decide collectively whether to adopt the policy for the following school year, and ultimately always choose to prioritize student nutrition in the district budget. Ruth mentioned that many districts do not have a CEP committee, but they have found it to be very useful in Edgecombe. This sentiment was reinforced by Edgecombe County School Board Chair, Rev. Raymond Privott, who said that Ruth’s ongoing education on school nutrition to principals and the administration helped them become more acquainted with the issue. Similarly, Tiwana Smallwood of Bertie County Schools emphasized the importance of support from the school board, superintendent, and finance department to successfully adopt and implement CEP. “It’s kind of like a team effort for child nutrition,” she added.

*"Oftentimes decision makers don't see the immediate benefits of free meals provided to underprivileged children in public schools."*

- Bertie County Schools

Lastly, nutrition directors highlighted that this information sharing and relationship building should not be limited to just within the district, but that these tactics can also be used to gain broader governmental support for CEP. Many directors stressed the importance of educating legislators at the state and federal level, and others outside of the child nutrition space, about the importance of school meals and how they impact students’ wellbeing. Tiwana Smallwood of Bertie

County Schools noted that state level decision makers do not see the day-to-day operations of child nutrition and the benefits of universal free meals to all students. "Oftentimes decision makers don't see the immediate benefits of free meals provided to underprivileged children in public schools." Melissa Albright of Carteret County Schools similarly noted, “I think just actually getting out there and seeing it and visualizing what really is happening, aside from numbers...you put names and faces with these kids and it just makes a big difference."

**6. Catering to students’ meal preferences and adopting CEP can boost student participation in school meals, which is crucial to making CEP financially viable**

Nutrition directors who successfully adopted CEP suggested one of the main ways they made the program self-sufficient is by making sure their students were interested in the meals they served, thus boosting participation rates and increasing federal reimbursement dollars. For example, Public Schools of Robeson County has an annual goal of boosting school meal participation, and they meet their objectives by offering new recipes and products and enhancing the meal presentation. Similarly,

Daniel Harris of Warren County Schools said he has a whole staff dedicated to developing new ideas that cater to the needs and interests of the students. Haywood County Schools also surveys students' meal preferences, and the staff sends out newsletters, social media posts, and phone messages to parents letting them know free meals are available through CEP.

In addition to explicit strategies to boost participation, directors also shared that adoption of CEP itself boosted school meal participation, as free meals were now accessible to all their students. Jennifer Brown of Swain County Schools, a district whose schools just barely passed the threshold for CEP eligibility in 2018-2019, said CEP allowed her district to serve breakfast in the classroom, which made their school participation go up so much that CEP was profitable for the district. She added that the district must pay the cafeteria staff the same amount regardless of how many meals were served, and so they probably could not make CEP work financially if their participation had not grown so much. The directors in Haywood and Scotland County Schools similarly agreed that the resulting boost in school meal participation stemming from CEP adoption prevented them from experiencing any financial challenges with the program. Alison Francis, Director of School Nutrition at Haywood County Schools, in which all participating schools were classified as low eligibility in 2018-2019, observed that a core piece of CEP success is making sure students who typically pay full price for their meals participate in the program as well. This helps to drive down the per unit cost of each meal.

Though some districts have certainly seen financial gains from CEP adoption, it is important to note that this outcome is not uniform. Melissa Albright of Carteret County Schools said CEP did not really boost meal participation in her district the way staff would have liked it to, but did add that the ability to serve breakfast in the classroom has been a help. Moreover, Amy Stanley, Director of Child Nutrition at New Hanover County Schools, where the average ISP for participating schools was 59.5% in 2018-2019, noted that the district has actually seen a decline in school meal participation. She said this is largely because the district cannot offer as many meal options as it used to due to the ongoing food shortages experienced across the country.

**7. Directors are concerned about transitioning off USDA waivers for universal free meals, and there is mixed opinion about whether the waivers have successfully boosted support for child nutrition**

Directors of districts who have not adopted CEP, or whose recertification period for CEP is coming up soon, are worried meal participation will drop after the USDA waivers allowing for universal free meals expire. Imer Smith of Brunswick County Schools is particularly concerned that during her CEP recertification year the schools in her districts will no longer qualify for the program. She shared that if

*“It’s going to be a big operation to get people back into what normal was.”*

- Brunswick County Schools

the district does have to revert to filling out school meal applications, she will need to hire another person in her office and do trainings and communications around the change. “It’s going to be a big operation to get people back into what normal was,” she added. Dana Edwards, Director of School Nutrition at Johnston County Schools and President of the SNA of NC, added that she is worried parents in non-CEP schools will not complete the meal applications next year after being used to automatically receiving free lunch for the past two years. If parents do not fill out these forms, they will have to pay for meals despite their qualification for assistance.

Beyond the logistical challenges of ending USDA waivers, there is also concern among some directors that they have not been able to successfully capitalize on the impact of the waivers to shift perception about the importance of universal free meals. Beth Maynard of Cumberland County Schools noted that she wished the waivers would have gotten more people to see the value of universal free meals, but because so many pandemic aid programs have received criticism, she is afraid there is too much political polarization around the policy. Similarly, Amy Stanley of New Hanover County Schools shared that even with the waivers, she has not seen school meals become a priority in her district. As a result, her staff has had to invest in a social media company to market their services and also improve their menus, though that has been difficult with supply chain challenges. Finally, Alison Francis of Haywood County Schools shared that she does not think her district’s boosted meal participation rates will continue post-pandemic, as parents perceive it is cheaper to provide meals from home.

However, there are some that do express hope that the waivers may present an opening to garner more support for a universal free meal policy. Makayla Mabry of Stanly County Schools said she does see this year as a turning point to get more people onboard for universal free meals. Since the implementation of the waivers in her district, participation in the school meal program has grown, stigma around receiving free meals has decreased, and parents and students have realized the food is

higher quality than they originally perceived. Similarly, Rachel Findley said she does hope that the Biden administration will agree to extend the waivers as this “would be a great jumping off point for CEP.”

### **8. Though school nutrition directors acknowledge the many benefits of CEP, they ultimately view it as a stepping stone to universal free meals**

While the benefits of CEP were certainly highlighted throughout interviews with nutrition directors, most expressed a wish for lunches to be permanently, universally free to students in public schools. This interest is particularly heightened after schools have received free lunches for the past two years due to the USDA waivers. Imer Smith of Brunswick County Schools noted, “USDA has been feeding kids for free for the last year and a half, and why can't we just continue doing that?” Likewise, Dana Edwards of Johnston County Schools added that the waivers could represent a turning point for universal free meals, and that if the waivers continue after this year, it would be “a stepping stone in the right direction.”

*“USDA has been feeding kids for free for the last year and a half, and why can't we just continue doing that?”*

- Brunswick County Schools

Directors similarly expressed frustration over the fact that while every other aspect of a public school education comes at no cost to students and families, meals still must be paid for. Daniel Harris of Warren County Schools, shared, “I always say if you ride a bus and go to school for free, you should sit in the cafeteria for free.” Similarly, Beth Maynard of Cumberland County Schools said that schools should put an emphasis on school nutrition in the same way they currently value school nurses or social workers. She expressed that the public should value the importance of feeding a child at school, regardless of their ability to pay – a sentiment shared by the other nutrition directors interviewed. Jayme Robertson of Yadkin County Schools succinctly summarized some of the frustration around CEP guidelines, saying, “Having that universal program where meals were distributed to students at no cost is going to trump CEP any day.”

*I always say if you ride a bus and go to school for free, you should sit in the cafeteria for free.”*

- Warren County Schools

## **V. Discussion and Recommendations**

The results from the quantitative and qualitative analyses clearly demonstrate that ISP level is the greatest driver of CEP participation in North Carolina, thereby making school finances one of the

biggest barriers to implementing this policy. Given these results, the most obvious recommendation is to encourage NCAH to advocate for federal legislation that increases the multiplier for CEP reimbursement and lowers the ISP threshold so more schools can participate in the program. Many nutrition directors agreed this kind of policy change would make it more feasible for them to adopt CEP, or at the very least make it more manageable to maintain the CEP program at schools that had already adopted it. However, given current political resistance around the Build Back Better legislation, which includes these provisions, and that NCAH's efforts primarily center on state-level policy, NCAH can engage in other, more incremental actions that can improve CEP adoption and boost support for universal school meals within the North Carolina context.

For example, the quantitative analysis highlighted the positive impact of high rates of Black students and Democratic politics on CEP participation, and the qualitative interviews provided anecdotal evidence to back up these results. NCAH could facilitate cross-district sharing or messaging development that draws from the experiences of these schools to help districts that may be facing financial challenges effectively advocate to their administrations or boards about the importance of CEP. In addition, information gathered from the interviews showed that direct communications, relationship building, and strong student participation in school meals are practices that have led to successful adoption of CEP – all strategies NCAH could support districts in implementing. While these policies probably cannot overcome a large financial deficit or low ISP level that stands in the way of CEP adoption, they likely will be able to provide support to those schools teetering on the edge of financial viability, or who are trying to build general support for CEP in their district. They also can contribute to broader advocacy efforts to push for universal free meals nationwide.

Based on the results found in the quantitative and qualitative analyses, NCAH should advocate for and provide capacity-building support to implement the following recommended actions at the local, state, and federal government levels to increase CEP adoption in North Carolina:

### *Local*

- **Develop district-wide CEP coordinating committees:** Because CEP participation has the potential to impact finances across a district, it is a decision that should be made as a collective. A CEP coordinating committee, similar to the one in place in Edgecombe County Schools, can bring together the most critical stakeholders whose input is needed to decide whether to adopt the policy. It can also give school nutrition directors the opportunity to provide ongoing education about the importance of school nutrition. Furthermore, by facilitating regular

standing meetings, it can help ensure CEP is an item proactively on the district's agenda to be considered, rather than one the school nutrition director must advocate for among a sea of other priorities. NCAH could help provide the initial capacity needed at the district level to mobilize stakeholders to create these committees.

- **Capture compelling stories from families and students about the value of universal school meals:** If the USDA waivers are extended for another year, districts should use this year to gather personal stories and experiences from students and families that can be used in a larger advocacy campaign to promote universal free meals. Districts should ensure there is a focus on capturing stories from those students that would not ordinarily qualify for free or reduced price meals, so they can highlight how this policy benefits all students regardless of income. NCAH's advocacy resources and trainings could help schools learn how to best use these individual stories to support a larger advocacy campaign.
- **Ensure students' meal and distribution preferences are considered:** Given that participation is such a huge driver of CEP success, schools should engage in efforts to make sure the meals they offer, and the way they offer them, meet the needs and interests of their students. One way to achieve this is by surveying students to better understand their preferences, or increasing the quality of food used for school meals. Because current food shortages are making it more difficult for some districts to offer a wide range of meal options, districts can also focus on engaging in more innovative food distribution practices, such as serving breakfast before the bell, or coordinating activities with school meals to garner participation. NCAH could develop a survey instrument for districts or create a catalog of innovative practices.
- **Share best practices across districts:** Though each district has a unique experience with CEP adoption given their own ISP levels, there are likely best practices that can be shared across district lines, such as how to boost meal participation or successfully advocate for CEP with the school board. Increased inter-district communication could also help allay concerns over challenges with CEP adoption, such as worries over unequal CEP adoption throughout a district or how to pay for the program. NCAH could support this cross-district learning by helping to build out formal coordinating bodies or sharing information through online mediums.
- **Engage in messaging and framing workshops that draw from successful advocacy efforts used in majority Black and Democratic-leaning districts:** While it is clear all districts care about the wellbeing of their students, the qualitative interviews showed that those in majority Black or Democratic-leaning districts were acutely aware of the role student nutrition can have on

academic success. Particularly in districts with majority Black schools, interviewees expressed they were willing to do anything to strengthen the wellbeing of their students, and that they were able to effectively persuade their boards to adopt CEP despite the cost. NCAH could facilitate framing workshops that help other districts build messaging and communications strategies highlighting the importance of CEP that draw from the successful advocacy efforts of majority Black and/or Democratic communities.

### *State*

- **Consider allocating funding to districts to close gap between total cost of CEP and federal reimbursement:** Given that many districts are hesitant to adopt CEP due to the immense financial burden it could impose, the state should evaluate the possibility of funding the cost of the program not covered by federal reimbursement. This is currently a heightened need as the federal reimbursement rate has not adjusted for the rising cost of food and the wage increase to \$15/hr. in North Carolina for non-certified school employees.<sup>49</sup> Because the state budget has competing priorities, legislators should examine the potential academic, health, and economic benefits CEP may bring to a school and wider community, rather than rely on generalized party support or opposition to social service funding. NCAH could use its convening and coalition building expertise to gather academics and practitioners who can build a body of evidence that supports the allocation of this additional funding.
- **Evaluate impact of Medicaid as qualifier for inclusion in a school's ISP:** For the first time this coming school year, North Carolina can use Medicaid participation as another qualifier for student inclusion in a school's ISP. This policy change has the potential to increase schools' and districts' ISP levels, as while around 700,000 children in North Carolina receive SNAP benefits, over 1.3 million are on Medicaid or the Children's Health Insurance Program.<sup>50 51</sup> A higher ISP level will increase the level of federal reimbursement schools and districts receive for CEP, thus lowering the level of funding needed from the General Assembly to cover the gap between the cost of the program and federal reimbursement. The state government should evaluate the impact of Medicaid on ISP levels to determine if this policy change makes it more politically and financially feasible for the General Assembly to cover the full cost of the program. NCAH can engage in communications efforts to ensure state legislators are aware of this important policy change to CEP in North Carolina.

- **Engage in school site visits to directly see the impact of school meals:** Many nutrition directors expressed frustration over the fact that those who have the most influence over the expansion of universal free meals and school nutrition funding rarely see the impact of school meals on students' lives. To better understand the critical importance of school meals to a school's and community's health and wellbeing, NCAH should facilitate site visits to allow legislators to see the effect of school meals in action. Members of the General Assembly can then draw on these personal experiences to advocate for further state funding for CEP and universal free meals.

### *Federal*

- **Pass legislation raising CEP reimbursement multiplier and lowering eligibility threshold:** One of the most expedient ways the federal government can boost CEP adoption is by passing the Build Back Better Legislation, which includes a provision to increase the federal reimbursement multiplier to 2.5 and lower the ISP threshold for eligibility to 25% for schools until 2030.<sup>13</sup> In particular, many schools said the increased federal multiplier, rather than the lower eligibility threshold, would be of most benefit. A higher federal multiplier could also potentially increase the state's support for providing additional funding, as the amount needed to fully fund the program would decrease. While advocating for the entirety of the Build Back Better bill is outside the scope of NCAH's priority areas, building support for this specific part of the bill could help the provision outlast the current legislative session and potentially separate into its own piece of legislation or become part of another bill.
- **Provide additional CEP reimbursements to accommodate for rising cost of living:** Currently, the federal reimbursement rate for CEP has not accounted for the rising cost of food and labor caused by rampant inflation in the U.S. If the federal government cannot pass legislation broadly increasing the federal multiplier to 2.5, they should at least consider offering additional reimbursement dollars to districts based on the unique economic challenges and financial realities of the states and regions in which they are located. By gathering additional research and facilitating conversations among experts about the rising cost of living in North Carolina, NCAH could help build a case around the need for additional federal funding for CEP in the state.
- **Offer grace period for schools when transitioning off USDA waivers:** The school nutrition directors interviewed expressed a great deal of anxiety about transitioning off the USDA waivers for universal free meals in the coming school year. In particular, they are afraid a current decline in school meal participation may make CEP no longer financially viable, or that parents may

forget to fill out free and reduced meal applications, preventing students from receiving needed meals. In the case that the USDA waivers are not extended into the coming school year, the federal government should consider implementing a three to six-month grace period for districts. During this time, schools should still be able to offer universal free meals as they work to transition families back to using the free and reduced lunch applications, or determine if their schools can still qualify for CEP. NCAH can build support for this grace period by sharing nutrition director perspectives on the waivers with the SNA of NC, who can utilize these stories in larger federal advocacy efforts supporting school nutrition programs.

## **VI. Conclusion**

There is widespread agreement that CEP can bring great benefits to students, school staff, and communities at large when implemented. Despite these positive outcomes, lack of district financial viability stands as the most prominent barrier to widespread adoption across the state. While additional funding for this program from both the state and federal government would be the most expedient way to increase adoption, political realities make this increased financial support unlikely. However, other strategies emerged from the quantitative and qualitative analyses that NCAH could help implement at the local, state, and federal level that will both increase CEP adoption and grow support for universal free meals generally. These strategies include learning from the effective advocacy practices of majority Black and Democratic communities, engaging in ongoing communications and education with the school board and administration about the importance of CEP, and catering to the meal preferences of enrolled students. While these strategies may not be able to help districts overcome large financial barriers to enrolling in CEP, they will likely be able to provide incremental movement toward CEP adoption, and also build a larger body of support for the implementation of universal free school meals throughout the state.

## Appendices

### *Appendix A: Summary Statistics of CEP Dataset*

	<b>CEP Participating (727)</b>	<b>CEP Non-Participating (407)</b>
<b>n = 1,134</b>	64.11%	35.89%
<b>Participating as Individual (20)</b>	2.75%	
<b>Participating as Group (707)</b>	97.25%	
<b>High Eligibility (384)</b>	47.32%	9.83%
<b>Medium Eligibility (349)</b>	32.05%	28.50%
<b>Low Eligibility (401)</b>	20.63%	61.67%
<b>Large (161)</b>	12.24%	17.69%
<b>Medium (573)</b>	48.97%	53.32%
<b>Small (400)</b>	38.79%	28.99%
<b>Nonmetro (416)</b>	41.82%	27.52%
<b>Majority Black (297)*</b>	35.28%	10.59%
<b>Democrat (458)</b>	47.18%	28.26%

\* Student racial data could not be found for all schools, so the n for this variable = 1,126.

## *Appendix B: Interview Protocol*

### **Introduction**

*Thank you for taking part in today's interview. Before we get started, can I receive your permission to record this interview? Can I also refer to your name and position in my final research report, and any direct quotes that may be relevant?*

*I can start by first giving you some background information on my project. For my master's project requirement at the Duke University Sanford School, I am working with the North Carolina Alliance for Health to learn more about what factors are contributing to adoption, or are acting as barriers to adoption, of the Community Eligibility Provision (CEP) in North Carolina. In particular, we are hoping to identify ways to boost CEP participation rates among eligible schools in the state as an intermediary step to gaining universal free lunches for all public schools.*

*For this project, I have analyzed CEP participation rates among schools across the state. I am now moving on to the qualitative portion of the project where I am seeking to gain first-hand perspective from those working with this program on a daily basis.*

*Do you have any questions for me before I begin my interview questions?*

### **Background**

1. Can you tell me about the demographic makeup of your district?
2. What are the specific attributes or characteristics that are unique to your district?
3. According to my data from the 2018-2019 school year, [insert fact about their participation in CEP.] Is this description consistent with your district's participation in CEP? If not, how has CEP participation in your district changed since the onset of the pandemic?

### **Impact of CEP**

4. How do the schools in your district that are participating in CEP benefit from this program?
  - A. *Probe:* How do students and families benefit?
  - B. *Probe:* How do staff and faculty benefit?

5. Among the schools that are not participating, what is the appetite to participate in this program?
6. Is expanded CEP participation an objective for your district, and why?

### **Barriers/Complements to CEP Adoption**

7. For the schools that have adopted CEP, what are some factors that have contributed to CEP adoption?
  - A. *Probe:* It seems that many schools that participate in CEP do so in groups. How do you think coordination/information sharing plays a role in adoption?
  - B. *Probe:* How do you think institutional knowledge or expertise plays a role in CEP adoption?
  - C. *Probe:* How do you think school boards play a role in CEP adoption?
8. For the schools that have not adopted CEP, what are some factors that have acted as barriers to CEP adoption?
  - A. *Probe:* How do you think school finances act as a barrier?
  - B. *Probe:* How do you think concerns over Title I funding act as a barrier?
  - C. *Probe:* How do you think lack of participation in the school meal program acts as a barrier?
  - D. *Probe:* What are the difficulties in getting up to the needed ISP level to be eligible for CEP?

### **Reactions to Findings from Quantitative Analysis**

*As I mentioned in the beginning of our conversation, I've done a bit of analysis on data related to CEP, and I would like to get your reactions to my findings thus far.*

9. It appears that eligible smaller schools are more likely to adopt CEP than eligible medium or large schools. How do you think the size of your school or district plays a role in CEP adoption?
10. It appears that eligible nonmetro schools, or those located in more predominantly rural areas, are more likely to adopt CEP than those located in metro areas. How do you think the geography of your school or district plays a role in CEP adoption?
11. It appears that eligible schools with a majority percentage of Black students are much more likely to adopt CEP than those without this majority. How do you think racial makeup of the student body in your school or district plays a role in CEP adoption?

12. It appears that schools in Democratic-leaning districts are more likely to adopt CEP than those in Republican-leaning districts. How do you think the political makeup of your district's constituents or school board plays a role in CEP adoption?

### Changes for the Future

13. My research findings are consistent with others that find that the higher the ISP level, the more likely the school is to adopt CEP. How do you think increasing the multiplier for federal reimbursement could affect CEP adoption rates? What about lowering the ISP threshold for eligibility?
14. How should individual schools and districts help boost CEP adoption?
15. How should school boards help boost CEP adoption?
16. How should the North Carolina state government help boost CEP adoption?
- A. *Probe:* How would more funding in the state budget for this program impact CEP adoption?
17. How should NC Senators and the federal government help boost CEP adoption?
18. The past two years have certainly been unique when it comes to school nutrition, as schools have been granted waivers from the USDA to offer free lunches to all students. How do you think these waivers will impact CEP adoption in the future?
- A. *Probe:* How have these changes boosted participation in school meal programs?
  - B. *Probe:* How have these changes reduced stigma around participation in the school meal program?
  - C. *Probe:* How do you think the waivers will impact future participation in free/reduced lunch?
    - *Probe:* Is there a concern because will forget to fill out forms in the coming years?
19. What else do you believe needs to happen to boost CEP rates in the future, if you believe this is a policy that should be more widely adopted?

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