



**GUIDANCE**

# **UNIVERSAL SCHOOL MEALS**

**SY 2023-24 Implementation Guidance**

**June 30, 2023**

Issued by the Vermont Agency of Education  
Child Nutrition Programs

## State of Vermont

### Agency of Education

Governor: **Phillip B. Scott**

Secretary of Education: **Heather A. Bouchey, Ph.D., Interim Secretary**

Chief Financial Officer: **William T. Bates**

1 National Life Drive  
Montpelier, VT 05620-2501  
education.vermont.gov  
(802) 828-1130

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This Document Issued by:

**Federal and Education Support Programs Division,  
Anne Bordonaro, Division Director**

**Primary Author:** Rosie Krueger, State Director of Child Nutrition Programs

**Editors:** Ted Fisher, Director of Communications and Legislative Affairs  
Nichole Barnes, Digital Communications Specialist

**Direct questions to:** Rosie Krueger, AOE Child Nutrition Programs,  
[mary.krueger@vermont.gov](mailto:mary.krueger@vermont.gov)

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## Purpose

This document provides guidance for Vermont School Food Authorities (SFAs) on how [Act 64 \(H. 165\), an act relating to school food programs and universal school meals](#), will be implemented in School Year 23-24. Guidance differs depending on the type of site (public school, state-approved independent school, state-recognized independent school, and non-profit child care providers pre-approved to provide Act 166 universal pre-K), and whether the site qualifies to operate the Community Eligibility Provision (CEP) or not. Please keep the status of your particular sites in mind while reading this document.

## Summary of Act 64

Act 64 requires that public schools in Vermont offer breakfast and lunch to all students at no charge. It provides state funding in the form of the “Universal Meals Supplement” for public schools that offer universal meals in the way that draws down the most possible federal funds (i.e., by using the Community Eligibility Provision (CEP), if eligible, or Provision 2, if ineligible for CEP). The Universal Meals Supplement is equal to the difference between the federal free and federal paid reimbursement rates and is paid out for each “paid” status meal served.

Act 64 also provides the Universal Meals Supplement for state-approved independent schools that offer breakfast and lunch at no charge to all students in the form that draws down the most possible federal funds. However, for these schools, the Universal Meals Supplement is limited to meals served to paid status students who are attending on public tuition. State-approved independent schools that wish to offer meals at no charge must identify another source of non-federal funds to cover meals served to paid status students who are not attending on public tuition.

Act 64 allows for non-profit child care providers offering universal pre-kindergarten and operating the National School Lunch Program as a site under a public school School Food Authority (SFA) to receive the universal meals supplement for all paid status meals served.

Act 64 specifies that funding for the universal meals supplement will be appropriated annually from the state Education Fund.

Finally, Act 64 permanently eliminates the exemption process for public schools to opt out of offering school meals and amends the Local Foods Incentive grant to make state-approved independent schools that receive the Universal Meals Supplement eligible for the grant.

## Public School Food Authorities

For public schools, Act 64 will effectively be identical to Act 151 (S.100), except that Act 151 was only in effect for the 22-23 school year and Act 64 implements universal meals

on a permanent basis. Act 64 requires that all public schools in Vermont offer breakfast and lunch at no charge to all students through the federal child nutrition programs. It provides a universal meals supplement for each “paid” status meal served to students at schools that operate the federal option that draws down the most federal funding, in the opinion of the Agency of Education (AOE). Barring any future federal changes to the meals programs, this means that to receive the universal meals supplement, public schools must operate the Community Eligibility Provision (CEP), if they are eligible for it. If they are not eligible for CEP, schools must operate Provision 2 to receive the universal meals supplement. Both CEP and Provision 2 operate on multi-year cycles. Act 64 specifically gives AOE the authority to require that School Food Authorities (SFAs) receiving the universal meals supplement start a new cycle of Provision 2 or CEP when doing so would draw down more federal funds than continuing an existing cycle. In each school year within one SFA, some schools may be operating CEP, some schools may be operating Provision 2 in a base year, and some schools may be operating Provision 2 in a non-base year. See the sections on [Planning for CEP](#) and [Planning for Provision 2](#) for details on how each of these options are implemented.

### **Interstate School Districts**

Rivendell Interstate School District has historically operated the federal child nutrition programs under the purview of the Vermont Agency of Education as the State agency. Barring additional legislative action, all paid meals served at all schools in the Rivendell Interstate School District are eligible for the Universal Meals Supplement provided that the SFA meets the requirement to offer school breakfast and lunch to all students, and to do so using the federal option that draws down the most possible federal funds.

SAU 70 operates three school districts. The schools of Dresden School District and Hanover School District are physically located in New Hampshire and have historically operated the federal child nutrition programs under the purview of the New Hampshire Department of Education as the State agency. Barring additional legislative action, Act 64 does not apply to the schools in these districts. The Norwich School District (Marion Cross School) is physically located in Vermont and has historically operated the federal child nutrition programs under the purview of the Vermont Agency of Education as the State agency. As a result, the provisions of Act 64 do apply to Norwich School District.

The applicability of Act 64 to any interstate school districts created in the future will be addressed according to their articles of agreement, and with which State agency they enter into a permanent agreement to operate the federal child nutrition programs.

### **Non-Profit Child Care Providers Pre-Qualified to Offer Pre-Kindergarten**

Historically, some public school supervisory unions and school districts have allowed some private non-profit child care providers that are [state-approved pre-kindergarten providers under Act 166](#) to operate as sites under the public school SFA. This is allowed under the USDA regulations defining a school found at 7 CFR 210.2(a). Act 64 clarifies that all “paid” status meals served at these sites are eligible for the universal meals

supplement when they operate under a public school SFA. SFAs may continue to operate these sites or add them as new sites.

- As a participating school, these sites must provide meals to all children enrolled at the site, including those under pre-kindergarten age.
- The universal meals supplement is available for all paid status meals served, including meals served to children under pre-kindergarten age.
- All requirements of the universal meals supplement at public schools apply. These include:
  - Breakfast and Lunch must be offered at no charge to all children at the site.
  - The federal option (CEP or Provision 2) that draws down the most federal funding must be utilized.
- Public school SFAs are never required to include these sites under their SFA.
- A memorandum of understanding between the SFA and the site outlining program responsibilities and funding is strongly recommended.
- The meal pattern for the Child and Adult Care Food Program (CACFP) must be used when the children are [not-comingled](#) with older grades. Even though the CACFP meal pattern is used, the meals are claimed under the National School Lunch Program and School Breakfast Program. The CACFP meal pattern includes separate requirements for infants.
- These sites may not claim the same meals under the CACFP.

For-profit pre-kindergarten providers may not participate in the National School Lunch Program and School Breakfast Program, per USDA regulations barring for-profit schools from participating in the school meals programs. For-profit providers are encouraged to consider operating the CACFP, which is open to for-profit providers.

### Independent Schools Operating Under A Public School SFA

Historically, some public school supervisory unions and school districts have allowed independent schools to operate as sites under the public school SFA, taking responsibility for school meals operations at these sites. This is allowed under USDA regulations, which allow multiple Local Educational Agencies (LEAs) to participate in the same SFA. In School Year 22-23, the Agency of Education interpreted Act 151 to allow any site operating under a public school SFA to be eligible for the universal meals supplement for all “paid” status students, if the site operated CEP or Provision 2. This included state-approved independent schools operating as sites under public school SFAs. In Act 64, the legislature has clarified that approved independent school sites operating under public school SFAs are only eligible for the universal meals supplement for publicly tuitioned students in “paid” status. **This is a change from how universal meals operated for these sites in School Year 2022-23.**

Public school SFAs may continue to operate sites at independent schools or add new sites at independent schools, when mutually agreeable to both LEAs.

- These sites are not required to operate universal meals.
  - If the independent school wishes to end their participation in a CEP grouping, the Identified Student Percentage (ISP) for the remaining schools in the CEP grouping will need to be re-calculated. Alternatively, the SFA may choose to start a new CEP cycle with the remaining schools in the grouping. Contact [Amanda Vassallo](#) for assistance with either situation.
- If these sites wish to operate universal meals, they must:
  - Provide breakfast and lunch at no charge to all students under CEP or Provision 2, in the manner that draws down the most possible federal funds.
  - Identify a source of non-federal funds that will be used to pay for meals served to non-publicly tuitioned paid status-students.
  - Plan for reporting the number of publicly tuitioned students on the monthly claim for reimbursement (See [Universal Meals Supplement for CEP: Sites at Approved Independent Schools](#) and [Universal Meals Supplement for Provision 2 – Sites at Approved Independent Schools](#) for more on these requirements).
  - Enter into a memorandum of understanding with the SFA outlining funding and reporting responsibilities.
  - Refer to the independent school sections for more instructions on how to operate these sites.
- Public school SFAs are never required to include independent school sites in their SFA.
- Meals served at state-recognized independent schools are never eligible for the universal meals supplement, regardless of the SFA they participate in. See the independent schools section below for more information.

### Independent Schools

Act 64 does not require that independent schools offer universal meals. However, non-profit state-approved and state-recognized independent schools are allowed to participate in the National School Lunch Program and School Breakfast Program and are allowed to operate CEP (if eligible) or Provision 2. If a state-approved independent school located in Vermont is participating in the NSLP and SBP and offers universal meals (both breakfast and lunch) through [CEP](#) or [Provision 2](#), Act 64 provides state funding to cover the cost of “paid” student meals for students attending on public tuition dollars. This funding is not available to state-recognized independent schools. The cost of “paid” student meals served to students who are not attending on public tuition dollars must be covered by another source of funds. The most likely source of funds is tuition funding, but donated or fundraised funds could be used as well. Generally, funds from the non-profit school food service account may not be used to cover the cost of these meals. However, waivers of the Paid Lunch Equity (PLE) requirement in effect for various circumstances and time periods may allow the SFA to lower the paid meal price to \$0 using funds from the non-profit school food service account while the waiver is in



effect. Consult with AOE Child Nutrition Programs to use excess funds in the non-profit school food service account for this purpose.

Students attending on public tuition dollars include:

- Pre-K students attending with tuition funding from Act 166, Universal Pre-K;
- Students from school districts that provide tuition instead of operating a school at that grade level;
- Special education students attending with public funding to receive services not provided at their public school.

See [Planning for CEP](#) and [Planning for Provision 2](#) for more information on how the universal meals supplement will be provided for schools operating these provisions, including special sections on how the supplement will be calculated for CEP schools and schools operating Provision 2 in a non-base year.

Non-profit state-approved independent schools that are not currently participating in the NSLP and SBP may apply to the AOE to begin participating. The AOE welcomes additional schools into the program but cautions that the federal regulations surrounding the program are complex, and it will likely take at least several months to meet the requirements and begin qualifying for federal and state funding. Interested programs should contact [Amanda Vassallo](#).

Per federal regulations, for-profit schools or for-profit Pre-Ks may not participate as sites in the federal school meals programs, even under a public or non-profit SFA.

## **The Universal Meals Supplement**

### **Calculating the Universal Meals Supplement**

The Universal Meals Supplement for breakfast is the difference between the federal free and the federal paid reimbursement rate for breakfast, based on the non-serve need rate. The Universal Meals Supplement for Lunch is the difference between the federal free and the federal paid reimbursement for lunch. Both amounts are based on the reimbursement rates for contiguous states published annually by USDA in the federal register. AOE will publish these rates annually in early or mid-July, immediately following USDA publication of the federal rates in the federal register.

### **Payment Timeline**

The Universal Meals Supplement will be processed and paid out at the same time as federal reimbursement funds are paid after the SFA submits the monthly claim for reimbursement in the Harvest Child Nutrition System.

### **Second Meals**

Schools are never allowed to plan to serve second meals. Second lunches can never be claimed for reimbursement in NSLP. However, if enough food is leftover, second

breakfasts may be provided under pricing programs and in CEP. These meals will not earn an additional Universal Meals Supplement. In Provision 2, second breakfasts may not be claimed for reimbursement. Note that “second meals” does not refer to whether children have already eaten a meal at home, it refers to whether children receive two breakfasts or two lunches from the school meals program.

## **Planning for CEP**

### **Qualifying for CEP**

To qualify for CEP, an individual school building (site), a group of school buildings (sites), or the entire SFA must demonstrate that at least 40% of their students are directly certified for free school meals. Please note, the percentage of directly certified students (known as the identified student percentage or ISP) is not the same as the percentage of students who are eligible for free and reduced meals. Directly certified students are a subset of the students who qualify for free and reduced price meals. Groups of schools within an SFA, or the entire SFA may be averaged together as long as the average ISP of the group is above 40%.

Annually, the AOE will review data submitted by SFAs in the CEP report (due April 15<sup>th</sup>) to determine which SFAs should begin a new CEP cycle in the following year to qualify for the universal meals supplement. AOE will notify these SFAs in May. SFAs starting a new CEP cycle during the following year must submit a “[Letter of Intent](#)” by June 30<sup>th</sup>. Once the letter of intent has been received, AOE will perform a review of the back-up documentation before finalizing the identified student percentages for the site or group of sites.

### **Meal Counting in CEP**

Schools participating in CEP do not need to track the names of students who eat reimbursable meals. Meal counts must still be taken at the point of service (POS); however, tick sheets can be used to count the number of reimbursable meals served to students. In general, the meal counting procedures allowed during the COVID-19 waivers can be used for schools operating CEP.

### **Federal Funding for Meals Served in CEP**

As schools participating in CEP are not required to track meals served by student name, the SFA will report the total number of reimbursable breakfasts and lunches served on the monthly claim for reimbursement in the Harvest Child Nutrition System. The Harvest Child Nutrition System will multiply the ISP by 1.6, and then multiply the result by the number of meals served to determine the number of meals reimbursed by the federal government at the “free” reimbursement rate. The remaining meals will be reimbursed by the federal government at the “paid” reimbursement rate. If the ISP is 62.5% or higher, then 100% of the meals will be reimbursed by the federal government at the free

reimbursement rate. All meals would be reimbursed at the free rate because an ISP of 62.5% multiplied by 1.6 is 100%.

### **Universal Meals Supplement for CEP: Sites at Public Schools and Non-Profit Child Care Providers Pre-Qualified to Provide Pre-Kindergarten**

The State of Vermont will provide the Universal Meals Supplement for every “paid” meal served at these sites. If the ISP is 62.5% or higher, the SFA will not receive the Universal Meals Supplement funding as all meals will receive the “free” reimbursement rate from the federal government.

### **Universal Meals Supplement for CEP: Sites at Approved Independent Schools**

On the monthly claim for reimbursement, sites at Approved Independent Schools participating in CEP will be asked to report the number of all publicly funded students enrolled as of the end of that month. The Harvest Child Nutrition System will multiply this reported number by the current enrollment to determine the percentage of students who are publicly funded. The result will be multiplied by the number of “paid” meals to determine the number of paid meals that will receive the Universal Meals Supplement. If the ISP is 62.5% or higher, the SFA will not receive the Universal Meals Supplement funding as all meals will receive the “free” reimbursement from the federal government.

### **Measuring Student Poverty for Educational Purposes in CEP Schools**

Schools operating CEP may not collect free and reduced meal applications. For purposes of reporting school-level poverty data (which is used for purposes such as Title I eligibility), the school may use the ISP of the building x 1.6 as a proxy for their free and reduced eligibility percentage. For determining individual student-level poverty data (used for non-child nutrition program purposes such as to determine eligibility for individual educational benefits such as Early College stipends), the school may collect the [Household Income Form](#) (HIF). The HIF may also be used in lieu of the multiplier along with direct certification information for school-level poverty reporting. Funds from the non-profit school food service account may not be used to pay for the collection and processing of the Household Income Form, as it is not needed for the child nutrition programs. More information on calculating poverty for educational purposes is forthcoming from the Agency of Education.

### **Next Steps for CEP**

- AOE has already contacted the SFAs that should plan to start a new CEP cycle in School Year 23-24.
- Within the Program Participation tab of the Site Application(s) in the Harvest Child Nutrition System Application for School Nutrition Programs, the SFA should indicate the site(s) that will be participating in CEP.
- If you are new to CEP, attend [CEP training](#) at Child Nutrition Summer Institute.

- CEP schools should not collect free and reduced meal applications. If you need household income information for other educational purposes, collect the [Household Income Form](#).
- CEP schools should count the total number of reimbursable meals served at the point of service (POS), but do not need to count meals by student status.

## Planning for Provision 2

### Provision 2 Operation

All public schools not eligible to participate in CEP will need to operate Provision 2 to receive the universal meals supplement. Independent School SFAs may operate Provision 2.

Provision 2 operates on a four-year cycle. The first year of the cycle is called the “base year.” During the base year, schools collect school meals applications and count and claim each meal served based on the status of the student who ate the meal. The school must conduct verification activities, as in a pricing-program. In non-base years, applications are not collected, and verification is not conducted. The total number of meals served is counted, and reimbursement is based on the claiming percentages from the base year.

### Special Notes for School Year 23-24

Many Vermont schools set a Provision 2 base year in School Year 22-23. However, many schools found it difficult to convince households to return applications and the base year numbers likely did not include many students who could have qualified for free and reduced price meals. Starting in July 2023, Vermont has been approved to participate in USDA’s Direct Certification through the Medicaid pilot. This means that schools will now be able to directly certify many more students for free meals. For the first time, schools will also be able to directly certify students for reduced price meals using Medicaid data. AOE expects that this new Medicaid information will allow schools to directly certify most of the students who formerly qualified for free and reduced meals via applications before Universal Meals began.

Using the new Medicaid data will result in schools having a higher free and reduced percentage, and a higher Provision 2 free and reduced claiming percentage, which will allow the state to draw down more federal funds. Act 64 (H. 165) gives AOE the authority to require schools receiving the universal meals supplement to start a new base year if it will draw down more federal funds. **Based on this authority, AOE plans to require most Provision 2 schools to start a new base year in School Year 23-24.** However, we will make an exception for schools that show that their free and reduced percentage as of the last operating day of October 2022 (as shown in the Site Enrollment Report and published in [2022-2023 Free and Reduced Eligibility Report](#)) is higher than the percentage of students directly certified according to the first direct certification run in late July 2023.

Schools that would like to request this exception should email [Amanda Vassallo](#) in late July/early August with the total number of directly certified students compared to total enrolled students for the upcoming year. AOE will grant this exception on a case-by-case basis.

Once new base years are set in School Year 23-24, AOE anticipates allowing most schools to continue on with those cycles for the subsequent 3 years, through the end of School Year 26-27. The only exceptions will be for schools that subsequently qualify for CEP. In that case, schools will be asked to start a CEP cycle.

### Instructions for Completing Harvest Applications for School Year 23-24

AOE recognizes that the timing of the release of the July Direct Certification Data (anticipated around July 20<sup>th</sup>) conflicts with the due date for SFAs to submit School Nutrition Program Applications in [Harvest](#). SFAs have several options:

- Sites that are certain they will not request an exception to the requirement to start a new Provision 2 base year should complete the Harvest application indicating a new base year will be started in School Year 22-23.
  - In the Harvest site application, after selecting that you are operating Provision 2:
    - Select “Breakfast and Lunch with the same base year.”
    - Select 2023-2024 for the base year.
    - Indicate the method(s) of socioeconomic data that may be used to request a cycle extension in SY 27-28. Sites will be required to upload documentation to support the socioeconomic information entered. Select as many methods as you have readily available. Selecting many methods will make it more likely that you will be able to extend the current cycle in School Year 27-28 and will not need to collect new applications that year.
    - Sites will also be required to upload their [Provision 2 Amendment to the Free and Reduced Policy Statement](#), which also contains this information.
    - Answer “No” to the question “Are you doing delayed implementation of Provision 2?”
    - Answer “Annual” to the “How are you claiming percentages?”
    - Answer “No” to the question “Are you returning to standard meal counting and claiming for breakfast and lunch before the end of your current cycle?”
  - Note: Sites in this situation should plan to collect [School Meals Application](#) (instead of Household Income Forms) in School Year 23-24.
    - Provide Households with the [Non-Pricing Meal Application Cover Letter and Instructions 2023-2024](#).
- For sites where the SFA is not certain about whether they will qualify for the exception, complete and submit the application indicating that the site will be operating a non-base year of Provision 2 in School Year 23-24.

- In the Harvest site application, after selecting that you are operating Provision 2:
  - Select “Breakfast and Lunch with the same base year.”
  - Select 2022-2023 for the base year.
  - Upload a copy of the Provision 2 Amendment to the Free and Reduced Policy Statement that was completed in School Year 22-23.
  - Answer “No” to the question “Are you doing delayed implementation of Provision 2?”
  - Answer “Annual” to the “How are you claiming percentages?”.
  - Answer “No” to the question “Are you returning to standard meal counting and claiming for breakfast and lunch before the end of your current cycle?”
- The SFA can later amend the application to indicate that they will be starting a new base year if the outcome of the July direct certification shows a new base year would be more advantageous. (Follow the instructions in the section above when amending the application)
- Schools in this situation should be aware that they may be required to start a new base year.
  - If required to start a new base year, they will need to collect [School Meals Applications](#) (instead of Household Income Forms) in School Year 23-24.
  - If not starting a new base year, they will not be allowed to collect School Meals Applications in School Year 23-24 and will need to collect the [Household Income Form](#) instead.
- In this situation, please keep open lines of communication with registrars, determining officials, administrative assistants, and other administrators who will be involved in collecting either form.
- For the few sites that were in a non-base year in School Year 22-23, you may be allowed to continue with that older cycle unless your July 2023 direct certification data shows a significant increase in free and reduced eligible students.
  - Answer the Provision 2 questions in Harvest according to your unique situation.
  - Plan to collect the [Household Income Form](#) instead of the free and reduced meal application in School Year 23-24.

## Meal Counting in Provision 2

In the Base Year of Provision 2, the school will need to count meals served by student status. This means that the school will need to track the name of each child who eats a meal each day, as would be done in a pricing program. Point of service meal counting methods that record which students have received meals, such as electronic POS systems with pin numbers or ID cards, or paper rosters, should be used to track this information.



In the Base Year of Provision 2, students are not charged for meals, however, the claim for reimbursement submitted to the AOE in the Harvest Child Nutrition System will need to identify the number of free, reduced, and paid status meals served to students each month. This will create the school's "claiming percentages."

The SFA will not need to collect applications or count meals by student status in Years 2-4 of the Provision 2 cycle. Instead, they will count the total number of reimbursable student meals served. The claiming percentages from the base year – the percentage of free, reduced and paid students who ate meals in the base year – will be applied to the total number of meals served in the non-base years.

### **Federal Funding for Meals Served in Provision 2**

Schools will receive the federal reimbursement rate for free, reduced and paid meals from federal funds.

### **Universal Meals Supplement for Provision 2 – Sites at Public Schools and Non-Profit Child Care Providers Pre-Qualified to Provide Pre-Kindergarten**

The state will continue to provide state funding to cover the student share of all reduced price meals. In addition, the SFA will receive the universal meals supplement for every "paid" meal served at these sites.

### **Universal Meals Supplement for Provision 2 – Sites at Approved Independent Schools**

The state will continue to provide state funding to cover the student share of all reduced price meals. In addition, on the monthly claim for reimbursement, Approved Independent School sites participating in a Provision 2 base year will be asked to report the number of "paid" status meals served to publicly tuitioned students.

Approved Independent School sites participating in a non-base year of Provision 2 will be asked to report their total number of students attending on public tuition and their total enrollment each month on the claim for reimbursement. This will be used to calculate a percentage of publicly tuitioned students, which will be multiplied against the number of "paid" meals, as calculated according to the paid claiming percentage. The result of this will be the number of meals that will receive the universal meals supplement.

### **Measuring Student Poverty in Provision 2 Schools**

During the Base Year of Provision 2, schools will have to collect school meal applications and direct certification information and may continue to use this information to calculate school-wide free and reduced percentages and as a metric of individual student poverty for other educational purposes. In Years 2-4 of a Provision 2 cycle, schools may not collect the school meals application. Schools should continue to collect direct certification information (for the purposes of the annual CEP Report) and may use

this information in combination with information from the [Household Income Form](#) as a metric of student poverty for other educational purposes.

### Next Steps for Provision 2 Base Year

If starting a new base year:

- Complete the Provision 2 [Amendment to the Free and Reduced Policy Statement](#).
- Follow the steps above in [Instructions for Completing Harvest Applications for School Year 23-24](#) to complete the Harvest Application.
- Begin a campaign to collect free and reduced price meal applications.
- Attend [Provision 2 training](#) at Child Nutrition Summer Institute.
- Conduct direct certification activities and process applications as normal.
- Count meals by student, but do not charge students for meals.
- Independent schools: Count the number of paid meals served to publicly tuitioned students.

### Next Steps for Provision 2 Non-Base Year

If continuing on in a non-base year:

- Do not collect Free and Reduced Meal Applications. If household income data is needed for other programs, collect the Household Income Form. Child Nutrition Funds cannot be used to collect and process this form.
- Continue to track direct certification information (needed for the CEP Report).
- Count the total number of meals served to students to submit the monthly claim for reimbursement.
- Independent schools: track the total number of publicly tuitioned students.

### Extending Provision 2 in Year 5 and Beyond

The claiming percentages established in the base year of Provision 2 are used for Years 2-4, without having to collect new applications. In Year 5, schools that can demonstrate that their socioeconomic status has not changed may request a four-year extension of their base year claiming percentages. The base year application information for Provision 2 schools asks for several socioeconomic factors including unemployment data, and direct certification data for 3SquaresVT (SNAP). The Vermont Department of Labor has information on [county level unemployment data for Vermont](#). This information could be used as a source for unemployment data. It is not easily printable, but can be captured with a screenshot. If any of these factors are unchanged or similar in Year 5, an extension can be granted, and the school will not need to collect applications again in Year 5 in order to continue with Provision 2.



## Additional Planning for Universal Meals

This section covers several additional areas that SFAs offering universal meals should plan to address.

### Meal Charge Policy

SFAs that do not charge for meals at any sites are not required to have a meal charge policy. It is recommended that SFAs maintain a policy that addresses how a la carte items, second meals and adult meals will be charged.

### Setting Meal Prices

Schools operating Provision 2 and CEP do not need to set a student meal price unless they plan to allow for second meals. Schools should set an adult meal price. The targeted adult meal prices will not be available until USDA releases the School Year 23-24 reimbursement rates, as adult meal prices are based on the applicable reimbursement rate plus the USDA Foods effective rate. In the Meal Charges tab of the Site Application(s) in the packet in the Harvest Child Nutrition Programs System, please enter an amount at least as high as the minimum adult meal price for in School Year 2022-2023.

### Operating the After School Snack Service

All schools may operate the After School Snack Service in the NSLP. However, only “area-eligible” schools can receive the full reimbursement rate for all snacks served. Schools are considered area-eligible when 50% or more of the students qualify for free and reduced price meals. CEP schools are area-eligible if they have an individual ISP of 31.25%. Schools that are not area eligible must claim after school snacks by student status. They may charge reduced and paid households for these snacks, or they may offer snacks for free using another source of funds. No more than 15 cents may be charged for reduced price snack. There is no state funding for reduced price or paid snacks in the After School Snack Service. If needed for the After School Snack Service, the School Meals Application may be collected in non-base years of Provision 2, but the resulting status should not be used for breakfast and lunch claiming. An optional paragraph in the [non-pricing programs meal application cover letter](#) addresses the need for the After School Snack Service.

### Operating the Summer Food Service Program

Act 64 only provides funding for universal meals served through the National School Lunch Program and School Breakfast Program. It does not provide additional state funding for meals served during the summer months through the Summer Food Service Program or Seamless Summer Option. To provide free meals to all children through the SFSP or SSO, the site must qualify as area-eligible under federal regulations for these programs or be eligible based on participants.

### Students Residing in Other States

There is no distinction in Act 64 between meals served to students who are residents of Vermont and students who reside in other states. The universal meals supplement will be provided for paid meals served to all students attending qualifying schools, regardless of their state of residence.

### Students Attending School Outside of Vermont

Meals served to students who reside in Vermont but attend a school located outside of Vermont (other than schools identified as eligible in the [interstate school districts section](#)) are not eligible for the universal meals supplement because their schools are not eligible for the supplement.