

**Policy Recommendations from the Food Research and Action Center
to the Nevada Food Security Council**

Recommendation #1: Increase the number of eligible schools implementing the Community Eligibility Provision (CEP) in order to expand school lunch and breakfast participation.

Rationale: The Community Eligibility Provision (CEP) allows high poverty schools to offer both breakfast and lunch at no charge to all students while eliminating the traditional school meal application process for schools. CEP benefits students and the school nutrition department's bottom line—it increases participation in the school nutrition programs by offering breakfast and lunch for free to all students; reduces administrative work for school districts by eliminating the need to qualify students for free and reduced-price meals and track which children are participating; and improves the overall financial viability of the school nutrition programs in high poverty schools.

Once breakfast is available at no charge to all, schools can use a variety of methods, including breakfast in the classroom, “grab and go,” and breakfast after first period, to make this important meal more accessible. A wide body of research shows that implementing an alternative breakfast model is the most effective means to increase participation and achieve the gains in academic success linked to school breakfast consumptionⁱ. Incorporating breakfast into the school day helps families whose early morning schedules make it difficult to fit in breakfast at home, and alleviates the problem of students missing breakfast in the cafeteria for any number of reasons, including school bus schedules or long school security lines.

Community eligibility has been shown to increase participation in the first states that implemented the optionⁱⁱ. In Illinois, Kentucky, and Michigan, where school districts first implemented the option for the 2011-2012 school year, there was a striking increase in the number of students eating school breakfast and lunch. In schools that have been participating in community eligibility for two years, average daily lunch participation has risen by 13 percent. Average daily breakfast participation has increased by 25 percent.

Action Steps:

- 1. Issue a letter from the Governor encouraging school districts with eligible schools to participate.** The letter could be from both the Governor and the Commissioners of Agriculture and Education, and could affirm that high-poverty schools will achieve maximum achievement through strong participation in school meals. On the federal level, the Secretaries of Agriculture and Education issued such a letterⁱⁱⁱ, and this could serve as a model for the state level.
- 2. Ensure maximum effectiveness of direct certification of school meals by implementing a state-level, central matching system.**
Currently, Nevada has a local-level matching system. The State provides schools access to a SNAP list which schools match to their enrollment list. This system is problematic in many ways, but especially for smaller districts, charter schools, and private schools with less administrative capacity. A centralized data matching system will result in more schools qualifying for community eligibility, and also increase a school's free claiming percentage for those schools

already operating under community eligibility. Also, as Nevada improves its system, it should explore mechanisms to include an individual student look-up function and matching of students who are in foster care or living in households that receive FDPIR benefits.

3. **Promote community eligibility and provide multiple opportunities for school districts to learn about it.** The state should develop a plan to promote community eligibility and work with advocates and other stakeholders to publicize it. As part of this effort, the state could issue a report with success stories of Nevada schools that are benefitting from CEP, that can serve as a model for those that are still hesitating to opt in. It could address concerns and barriers that may exist in some districts in order to overcome opposition or resistance. The report could be widely disseminated and used to promote best practices in adopting CEP.
4. **Require CEP schools to offer an after-the-bell breakfast program with all-student access.** Often called “breakfast in the classroom,” these programs give all children the opportunity to eat in their classroom as they begin their school day. Service options include breakfast delivered to the classroom, “grab and go” breakfast service from carts or kiosks set up in school hallways or cafeterias, and breakfast after first period in middle and high schools. Community eligibility’s secure funding for breakfasts, and its elimination of the requirement to track individual student breakfast participation, allows schools to implement these program without the concern of endangering their bottom line. Similar legislation has been passed in Colorado, New Mexico and Washington, DC, which can serve as a model for legislation in Nevada.

Recommendation #2: Increase student participation in the School Breakfast Program, with special focus on the schools with high concentrations of free and reduced-price eligible students.

Rationale: Expanded availability, accessibility, and participation in the School Breakfast Program is one of the best ways to support the health and academic potential of children, particularly low-income children. Adequate nutrition and freedom from hunger are absolutely essential for good health and academic success, and yet these goals are not always achievable for families who are struggling to make ends meet. Significant progress has been made in recent years to expand participation in the School Breakfast Program, however, there is ample opportunity for continued growth. Failure to serve more students in need means the loss of significant federal revenue for Nevada. If each public school district provided at least 70 low-income children with breakfast (through the School Breakfast Program) for every 100 low-income children that received lunch (through the National School Lunch Program), they would receive an additional \$9.9 million in federal reimbursements, and an additional 39,000 students would receive a healthy breakfast each day. In FRAC’s national ranking of state breakfast participation, Nevada ranks 31st in reaching low-income children with school breakfast^{iv}.

Action Steps:

1. **Issue clear policy to school districts that time spent in the classroom eating school breakfast counts as instructional time.** The most common concern that teachers raise about breakfast in the classroom is that the program will take away from valuable instructional time. In practice, however, breakfast in the classroom generally takes about 10-15 minutes for children to eat, and is often done during morning activities, such as announcements, turning in homework or individual reading time so no instructional time is lost. After breakfast in the classroom is

implemented, teachers frequently report that their students' productivity and ability to focus increases dramatically. Less time is spent on distractions such as behavior problems or illnesses caused by hunger. Many state superintendents of education, including California, Indiana, Michigan, New Jersey, and Pennsylvania^v, have issued policy memos clarifying that classroom breakfast meets the requirements of instructional time. Nevada should do the same.

2. **Require schools with 80 percent or more students qualifying for free or reduced-price meals to offer a free breakfast after-the-bell program.** Often called "breakfast in the classroom," these programs give all children the opportunity to eat in their classroom as they begin their school day. Service options include breakfast delivered to the classroom, "grab and go" breakfast service from carts or kiosks set up in school hallways or cafeterias, and breakfast after first period in middle and high schools. Schools with high levels of free and reduced-price students can take advantage of the Community Eligibility Provision or Provision 2 to ensure adequate funding and to streamline program administration. Similar legislation has been passed in Colorado, New Mexico and Washington, DC, which can serve as a model for legislation in Nevada.

Recommendation #3: Increase participation in the Afterschool and Summer Nutrition Programs. In Nevada, there has been a tremendous amount of work to increase participation in these critical programs, but there remains opportunity to expand their reach.

1. **Expand the use of the Afterschool and Summer Nutrition Programs on weekends and school holidays.** The Afterschool Meal and Snack Programs can provide up to a meal and a snack to children on weekends and school holidays during the school year. The Summer Nutrition Programs can provide up to two meals on weekends during the summer. Numerous boys and girls clubs, recreation centers, churches and other entities are open on weekends providing educational and enrichment activities, but few use the nutritious programs to serve meals on the weekends. This option can be aggressively promoted to sponsors, nonprofits, churches and other program providers by developing and distributing outreach materials specific to feeding children on weekends and school holidays. The opportunity also can be promoted at state afterschool, education, and nonprofit conferences and coalition meetings and highlighted at trainings for sponsors.
2. **Require eligible communities to participate in the nutrition programs.** There are a variety of ways that other states have done this. For example, Florida and Texas schools require eligible schools to participate in the Summer Nutrition Programs; Maryland and Ohio require summer school programs to provide meals; and Oregon requires those receiving 21st Century Community Learning Center funding to participate in the federal nutrition programs.

ⁱ [Breakfast for Learning](#)

ⁱⁱ [Community Eligibility: A Powerful Tool in the Fight Against Child Hunger](#)

ⁱⁱⁱ [Joint Letter to Chief State School Officers from Thomas Vilsack, Secretary of Agriculture and Arne Duncan, Secretary of Education, 2/25/14](#)

^{iv} [School Breakfast Scorecard: 2012-2013 School Year](#)

^v See FRAC's [Expanding School Breakfast Participation](#) for examples