



# Student Participation



## ISSUE

**How have school food service directors maintained or increased student participation in school meal programs following implementation of provisions resulting from the Healthy, Hunger-Free Kids Act of 2010 (HHFKA)?**

## BACKGROUND

HHFKA required the U.S. Department of Agriculture (USDA) to issue new science-based nutrition standards for school lunch and breakfast, which included offering more fruits and vegetables and whole grain-rich foods, reducing sodium levels, setting targets for calories and key macronutrients, and improving the nutritional quality of snack foods sold in schools.

The HHFKA-related provisions were phased in over several years. During school year 2012-2013, two provisions went into effect: (1) school food authorities (SFAs) were required to include both a fruit and a vegetable during lunch (instead of a fruit or a vegetable), and (2) at least one-half of the grains offered during lunch had to meet the whole grain-rich criteria. The following year, 2013-2014, one-half of grains offered during breakfast had to be whole grain-rich. During school year 2014-2015, SFAs were required to: (1) offer one cup of fruit or vegetable at breakfast, (2) offer all whole grain-rich products at breakfast and lunch, and (3) meet sodium Target 1 levels<sup>1</sup> for school breakfast and lunch.

Although the primary intent of HHFKA was to improve the nutritional quality of foods offered to students, the law also required SFAs to make changes to the pricing structure of foods sold in schools. A key change was the Paid Lunch Equity Provision, which took effect starting in school year 2011-2012. The provision required SFAs, all of which operate as self-sustaining non-profits, to generate the same level of revenues for paid lunches as the level obtained for lunches provided to students who have been approved for free or reduced-price meals.

The impetus for the Paid Lunch Equity Provision was to ensure that reimbursements for free and reduced-price

meals did not subsidize full-price meals. As a result, some SFAs had to raise paid lunch prices, and those SFAs will continue to raise prices until the requirement is met. Based on concerns that USDA heard from school districts in a strong financial position, guidance was issued that provided flexibilities that schools may use when implementing this requirement in school years 2013-2014 and 2014-2015. The guidance allows State agencies to exempt school districts from the Paid Lunch Equity Provision if they can demonstrate a strong financial standing.

HHFKA also included the Community Eligibility Provision (CEP), which eliminates the burden of collecting household applications in order to determine student eligibility for the school meal programs. Schools and school districts that meet the CEP eligibility criteria<sup>2</sup> can serve free breakfasts and lunches to all students. CEP was phased in over time, starting with three States in school year 2011-2012, with additional States added in subsequent years. Beginning with school year 2014-2015, CEP was made available nationwide.

Assessing student participation rates in school meal programs addresses the degree to which the programs succeed in reaching students, particularly low-income students who are certified for free or reduced-price meals. Participation rates among students who pay full price for school meals may be more sensitive to increases in meal prices and the availability of alternative food sources. Student perception of the quality of the meals also is a concern. Therefore changes in meal prices, and changes in the nutritional characteristics of foods served, may change student participation rates.

*“I think the bottom line is we are never going to please everybody because there are so many different eating habits out there. ... I think a lot of it is educating, encouraging, and giving the children time to eat. Then, providing [the food] is flavorful*

1. For sodium Target 1 and Target 2 levels, see <http://www.fns.usda.gov/sites/default/files/sodium.pdf>.

2. At least 40 percent of students were directly certified for free meals in the prior year.



*and as high a quality product as you can possibly provide – is really what you’ve got to do.”*

During fiscal year 2010, about 31.8 million students ate lunch on an average school day, and almost 11.7 million ate breakfast. Although participation in breakfast increased between 2010 and 2014, participation in school lunch declined (see Table 1). Increases in participation among students receiving free lunch increased, while participation declined among reduced-price and full-price students.

Table 1. Average Daily Student Participation in School Breakfast and Lunch Programs, 2010-2014 (in Millions)

Fiscal Year	Number of Students				Total Meals Served
	Free	Reduced Price	Full Price	Total	
<b>Breakfast</b>					
2010	8.7	1.0	1.9	11.7	1,968
2011	9.2	1.0	2.0	12.2	2,048
2012	9.8	1.0	2.0	12.9	2,145
2013	10.2	1.0	2.0	13.2	2,223
2014	10.5	1.0	2.1	13.6	2,274
<b>Lunch</b>					
2010	17.6	3.0	11.1	31.8	5,278
2011	18.4	2.7	10.8	31.8	5,274
2012	18.7	2.7	10.2	31.7	5,215
2013	18.9	2.6	9.2	30.7	5,098
2014	19.2	2.5	8.7	30.4	5,020

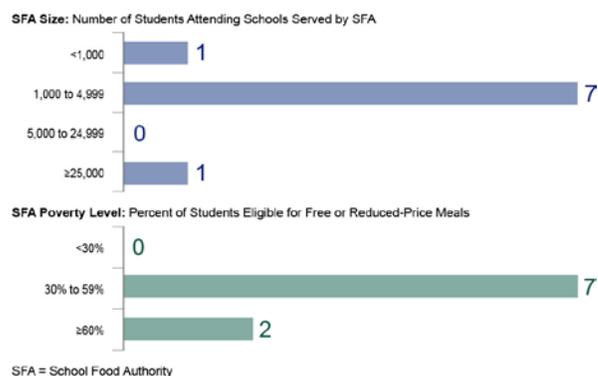
Note: FY 2014 data are preliminary; all data are subject to revision.

Source: National School Lunch - Participation and Meals Served, and School Breakfast - Participation and Meals Served, available at <http://www.fns.usda.gov/pd/child-nutrition-tables>.

This research brief presents an overview of student participation levels as school food service directors transitioned their programs to meet the new regulatory provisions, a summary of the strategies that directors have used to overcome meal participation challenges, and recommendations for technical assistance. The information comes from semi-structured discussions conducted by telephone (focus group or individual interview) with nine school food service directors in May 2015. Although the participants are not statistically representative of all directors, the qualitative data collection technique was particularly suited to gaining in-depth understanding of how directors implemented HHFKA. See Figure 1 for a summary of the size and poverty level of the SFAs represented by these directors.<sup>3</sup>

3. This brief also includes strategies cited by directors who participated in focus group discussions and telephone interviews for research briefs in this series on other aspects of HHFKA implementation, including whole grain-rich foods, fruits and vegetables, sodium, Smart Snacks, plate waste, food service revenue, and childhood obesity.

Figure 1. Characteristics of School Food Authorities (SFAs) Represented by Participating School Food Service Directors



## KEY FINDINGS

School food service directors in this study said they took a proactive approach in preparing for the new meal requirements, helping students become familiar with the new foods, and explaining the changes to everyone involved. The directors cited four main challenges in maintaining or improving student participation levels in school meals: (1) identifying products and preparing meals that comply with the provisions and appeal to students, (2) increasing student selection of new foods, (3) collecting applications for determining school meal program eligibility, and (4) obtaining support from school administrators, teachers, and parents.

Directors described successful strategies that helped them address these challenges, including:

- Attend trade shows and sample products, practice scratch cooking, network with other school food service directors, introduce change slowly, and obtain student feedback on new menu items.
- Introduce students to foods using samples and activities, serve grab-and-go meals, set up food courts, and use *Smarter Lunchrooms* strategies.
- Implement the Community Eligibility Provision.
- Involve school administrators and teachers in promoting change and keeping parents informed of the changes.

Technical assistance related to maintaining student participation in school meal programs should include strategies for obtaining compliant food products, information about providing staff training on how to prepare appealing meals, strategies for marketing new meals to students, and strategies for obtaining support from school personnel and parents.



## OVERVIEW OF THE TRANSITION PROCESS

### Student Participation in School Meals Prior to HHFKA

SFAs have a primary mission to provide meals to students, and, therefore, have always viewed participation rates as important. In addition, student participation generates revenue, which is essential for SFAs to remain financially viable and carry out their mission. School food service directors who participated in this study reported that school meal participation levels prior to HHFKA were fairly stable. Several directors reported slight decreases in participation just prior to when the law took effect; these directors attributed the decreases to the changes that they started making to school meals in preparation for the HHFKA provisions. A couple of the directors specifically tied the decline to paid students no longer participating in the meal programs.

Prior to HHFKA, several school food service directors said they were actively trying to increase student participation, particularly for breakfast.

### Transitioning to the HHFKA Requirements

School food service directors who participated in this study were acutely aware of the impending changes to the school meal programs. Several noted that they received information from their State child nutrition directors as well as from professional organizations. All of the school food service directors said that they took a proactive approach in preparing for the new meal requirements. Although the directors did not specifically state that more time was needed to implement the provisions, they said that they sought to get a head start and thus give themselves more time to achieve compliance.

A few school food service directors said that they started to make changes prior to HHFKA because they saw the need to change the types of foods being served to students. In some cases, directors recalled that parents were urging school officials to provide healthier meal options for their children.

*“It was very popular to have mashed potatoes and chicken and noodles, oftentimes [with] corn as the vegetable that day. Parents pushed for that being too many starches. So we took those vegetables off when we made chicken and noodles, and put on green beans or broccoli or something, usually greens, instead.”*

### Increasing Meal Prices

As a result of the Paid Lunch Equity Provision, which took effect on July 1, 2011, many SFAs were required to raise

lunch prices for students who were paying full price for their lunch. The maximum required price increase in a given year is 10 cents. However, an SFA can choose to raise prices more than 10 cents. SFAs must continue to raise prices until the average price of a paid school lunch is no less than the difference between the reimbursement rate for free and paid meals.

SFAs also can seek other non-Federal sources to make up the revenue lost from “underpricing” of paid lunches. SFAs are required to balance their revenues and expenditures each year, which can be accomplished through a variety of means. In addition to the Federal reimbursements for meals served, other sources of revenue include State reimbursements and food sales to participating students and school staff. SFAs also can seek additional revenue through grants.

School food service directors said they heard from some parents that the increases in meal prices were too large, particularly when prices increased several years in a row. One director reported hearing students say that their parents would not allow them to eat school meals every day because of the increased meal price. The district tried to keep prices constant at the elementary school level, which meant that the price increases primarily affected high school students.

In addition, school food service directors in this study said that some students perceived portion sizes as becoming smaller, which gave the impression that the meals were of less value. This perception, coupled with the price increase, resulted in some students choosing not to buy school meals. According to one of the directors, it took many conversations with parents and students to help them understand why the changes were happening and to obtain their support.

*“The price thing is a concern. You tell parents, ‘Still, it’s a heck of a good deal,’ but so many people are locked back into what it was like when they were a kid, and it should be so cheap.”*

School food service directors suggested that implementing the Paid Lunch Equity Provision—at the same time as other provisions that required major changes to meals—led to declines in participation rates.

### Providing Opportunities for Students to Try New Foods

As the school food service directors in this study made changes to school meals to comply with the new provisions and noticed participation levels decreasing, they started looking for ways to engage students. Directors realized that many students were unfamiliar with some of the new fruit and vegetable menu items. Students also were not accustomed to the flavor of low-sodium and whole grain-



rich foods. Directors knew they needed to get students to at least try the new foods and not dismiss them solely based on appearance. Directors used a variety of methods to achieve this, such as offering samples one day each week, doing taste tests, giving stickers to students who tried unfamiliar foods, and striving to make new foods taste like foods that students were familiar with.

*“You almost have to mimic what they see around them or what their comfort foods are.”*

The school food service directors’ efforts to maintain and potentially increase participation were driven by the SFA’s function as a self-sustaining non-profit business, as well as by their personal desire to provide nutritious meals to students, particularly to those students who face food insecurities. Directors said that they are particularly concerned about students who lack access to sufficient or quality food. Food insecurity has existed throughout history and is the basis for the school meal programs, and the condition received increased attention in 2006 when new definitions were adopted to describe ranges of food security.

*“How well children eat at the elementary level is in relationship to the staff and the cafeteria’s attitude. If they’re positive about eating fruits and vegetables and encouraged kids to eat them, they’re more likely [to do so] than in schools where they don’t do that.”*

### Communicating New Standards to Staff, Parents, and Students

The school food service directors in this study said it was important to communicate and explain the changes taking place in order to gain widespread support and buy-in. Directors identified opportunities to inform school staff and school boards about the changes, including the need to increase meal prices.

## STRATEGIES TO MAINTAIN STUDENT PARTICIPATION

The school food service directors who participated in this study cited four main challenges to maintaining student participation while implementing the provisions resulting from HHFKA:

1. Identifying products and preparing meals that comply with the provisions and appeal to students,
2. Increasing student selection of new foods,
3. Collecting applications for determining school meal program eligibility, and

4. Obtaining support from school administrators, teachers, and parents.

School food service directors described successful strategies that helped them address these challenges, slow the declines in student participation, and reverse the trend, as summarized below.

**Challenge 1:** Identifying products and preparing meals that comply with the provisions and appeal to students.

✓ **Attend trade shows and sample products at co-op meetings.** Most of the school food service directors said that they attended vendor trade shows in an effort to find products that met the nutritional requirements and tasted good. Directors credited manufacturers for their research and development efforts in formulating products that met the new provisions and that were acceptable to students.

One director who participated in a food-buying co-op said that in his district, co-op staff obtained food samples from brokers and brought these to the annual co-op meeting. Directors sampled the products and collectively made product purchase decisions. Directors also provided feedback to their vendors in order to find items that students would like.

*“We’re in the co-op, and what my person does ... he brings us all together every year in September. He has a meeting at the convention center and he brings all these different foods, and ... we talk and we’re going backward and forth about what— who’s going to like this, like that, are your kids going to eat this, not going to eat that.”*

*“Once the Healthy, Hunger-Free Kids Act was implemented, it really changed our way of thinking, because you had to reach out to vendors to be able to get the product that mimicked the food that you were previously serving, and that was very tough to do, very tough.”*

✓ **Network with other school food service directors.** Networking with other directors provided opportunities to build upon and expand knowledge about high-quality, available food products. Directors established a network with other directors by attending regional and national conferences, going to meetings of the food buying



co-op, and using social media (e.g., Facebook) to stay connected.

Directors noted that students in different parts of the country may not find the same products acceptable, depending on cultures and the types of foods students are accustomed to eating at home. One director even noted that students in different areas within her district do not like the same types of foods.

*“We started trying new items when the new meal pattern came out. We started trying different types of biscuits, different types of items that tasted better. The first year that the new meal pattern came out, I don’t think that the manufacturer had enough time to produce a quality product that tastes good and met the new requirements.”*

✓ **Cook from scratch and use batch cooking.** Several school food service directors reported moving toward scratch cooking and modifying recipes to include more spices so the foods had more flavor. A few directors said they successfully used USDA recipes to prepare dishes from scratch.

Some school food service directors noted that scratch cooking allowed them to flavor foods with more spices, which improved student selection and consumption.

*“For whole grain, I guess we make all of our rolls, garlic bread, and cinnamon rolls. ... We started with the roll and got that recipe perfected from scratch ... and then went on to the other items as we got it developed to where we felt good about how our product turned out.”*

A few directors moved toward purchasing frozen pre-made heat-and-serve items that could be prepared in batches in school kitchens. Some school food service directors used a combination of pre-cooked items and items made from scratch in meal preparation in order to control sodium levels and meet other nutritional requirements for meals.

*“Here is our food, down here with sodium content – and the home and restaurants are up here – where it’s never going to be a gap that’s going to meet.”*

✓ **Introduce change slowly and offer variety.** All of the school food service directors recalled that they had

known things were changing and the HHFKA regulations were coming, so they had started making changes early. In some cases, directors had started making changes to their menus several years before HHFKA went into effect. Several said they were already compliant by the time the regulations took effect.

Apart from HHFKA, a few directors said that they had already realized that the foods needed to change, or they said that they had been hired specifically to improve the quality of school meals. By starting early and making changes slowly, they were able to identify a variety of products that tasted good and met the nutritional requirements. By the time HHFKA took effect, many of the SFAs were already compliant, or very close to being compliant.

*“I try to fit in one dessert each week. A lot of our desserts are frozen 100% juice items. We’re looking out for the fruit. [The desserts] help keep participation up.”*

✓ **Obtain student feedback.** School food service directors said it was important to provide students with opportunities to try new food items. They felt that if they could get at least one student to try an item, the child’s friends and other students also would want to try it, even if it was something that was unfamiliar to them. Directors used a variety of methods to reach students, including organizing taste tests and focus groups, which they noted could be fairly time consuming.

*“It’s just like I’m going more towards what the customer wants so that I can serve them and sell to them.”*

School food service directors also said that they surveyed students, either directly or by including questions related to school meals on annual district-wide surveys. Some directors said that they did not find the surveys useful, because they did not have the time or resources to analyze the information.

**Challenge 2:** Increasing student selection of new foods.

✓ **Introduce students to foods using samples, fun activities, and educational methods.** Several school food service directors said they used a less-formal approach by handing out samples of foods while students were waiting in the cafeteria line. To make the process more fun, one director said, they had theme or promotional days when staff dressed up, which helped to get children excited about the food.



*“We do an ‘Under the Sea Day,’ where we’ll have a fish product like fish nuggets, and then work it in where they’re going to have blue gelatin with it to make it fun, and the staff dress up.”*

To help students learn about the foods being offered, one school food service director reported setting up a quiz for students. A question is posted at the beginning of the food service line, and students are given the answer when they reach the end of the line. Another director discovered that students did not know the names of many of the fruits and vegetables being offered, so they posted pictures with labels of the fruits and vegetables being served. The director found that students were more likely to take an item when they knew what it was.

✓ **Offer grab-and-go meals or vending machines with compliant reimbursable meals.** School food service directors described a variety of options they have used to give students the opportunity to get healthy meals. Several directors noted that many schools have reduced the amount of time that students have to eat school meals, due to schedule changes that reflect the increased emphasis on testing and instructional time.

One school food service director said that junior and senior high school students do not have adequate time to eat. With shorter lunch periods, there is not enough time for all students to go through the regular lunch line. To remedy this problem, the director plans to install three vending machines that will have healthy meals that meet all nutritional requirements.

Another school food service director implemented grab-and-go breakfast options to provide students with more time to eat. The director noted that many students arrive late to school, which increased the need to provide a quick way for students to get breakfast.

Other school food service directors reported adding additional serving lines that could be targeted for specific food items. For instance, directors added lines dedicated to grab-and-go food items or salad bars. The additional lines provided students with more choices and reduced the number of students waiting in any given line.

✓ **Set up food courts.** One school food service director described implementing food courts in all of the district’s high schools. The food court offers students a choice of food service stations with distinct menu offerings. The director also hired school nutrition staff with experience at local restaurants, a shift made possible because of the decline of the local hospitality industry. He said the staff are skilled at preparing quality food and understand the concept of customer service, factors that are important for creating appealing products and maintaining participation.

*“We have 2,500 kids in our high school, and we only have two half-hour lunches, so thank God that we have two food courts in our high school with eight double-sided registers, point-of-sale registers. ... We don’t have enough seating for each lunch, so we actually have to fold tables out, and put them into the hallway for the overflow because we don’t have kiosks set up.”*

✓ **Use Smarter Lunchrooms strategies.** Several school food service directors implemented changes to make food presentation and the lunchroom environment more appealing to students, increase the number of students who can be served, and increase the sales of fresh fruits and vegetables. A more appealing environment and attractive displays of food also encourage students to purchase school meals rather than bringing food from home.

School food service directors shared examples of *Smarter Lunchrooms* strategies, such as moving the fruit near the register to capture impulse purchases, adding a dedicated line for the salad bar, and using creative names to describe foods such as Snappy Green Beans, Texas BBQ Sandwich, or Fluffy Mashed Potatoes. Directors also said that they have added signs and posters with information about different foods and healthy eating.

Several school food service directors talked about changing the placement of foods, particularly for fruits. The placement can be at the beginning of the food service line so students select these items first, as well as at the end of the line so students can be sure to have the components they need for their reimbursable meal. Directors also worked to display fruits and vegetables more attractively in baskets or decorative bowls.

*“Most of the time when people complain they’re still hungry, they’re not eating the fruits and vegetables.”*

One school food service director said they removed the “beat-up accordion curtain” that closed the kitchen off from the cafeteria and replaced it with clear paneling. This made the cafeteria look more like a “professional restaurant,” and students could see the kitchen staff inside. This helped to improve the relationship between students and the staff.

*“So, like when I get stale, I’ll get out of the district and I’ll go to a local supermarket and see what they do, because you have to get the food to them,*



*and what's going to make them pick up that 100% fruit juice, so to speak, or ... what's going to be the impulse item. ”*

School food service directors noted that a cheerful eating environment is important, and they described how they decorated the serving line to make it inviting to students. One director described a project in which students wrote down what they were grateful for from the school nutrition staff, and the thank-you notes were posted in the serving line.

**Challenge 3:** Collecting applications for determining school meal program eligibility.

✓ **Implementing the Community Eligibility Provision (CEP).**<sup>4</sup> Students whose parents do not complete the application for determining eligibility for free and reduced-price meals often do not participate in the school meal programs, which means that those children miss out on nutritious food and the schools receive less revenue. CEP eliminates the need for individual applications in high-need communities and ensures that all students receive free meals.

Those school food service directors whose schools now operate under CEP noted that the number of students participating in the school meal programs increased after eliminating the household applications that were used to determine student eligibility.

**Challenge 4:** Obtaining support from school administrators, teachers, and parents.

✓ **Involve school administrators and teachers in promoting change.** School food service directors said they attended school board meetings to discuss the required changes, including the increased meal prices. Directors also engaged teachers in discussions about changes in the menu, and about how to promote new meals through classroom lessons and other activities such as art contests and taste tests.

Most of the school food service directors in this study acknowledged that although students are their primary customers, adult meal participation was an important source of revenue. One director shared his experience of having teachers eating school meals in the cafeteria or in the classroom, noting that this was an important revenue

source, and that it also led to increased student acceptance of meals.

✓ **Keep parents informed about the changes.** School food service directors used several methods to inform parents and engage them in promoting new meals. All directors provided information about foods on their Web site as well as in newsletters. Some directors said that parent volunteers helped them monitor food service in the cafeteria, and a few directors invited parents to eat school meals. Some directors said they had informal conversations about changes in school meals with parents during school and at after-school events. Directors often used social media such as Facebook to communicate with parents and obtain feedback.

*“I guess what drove it for us was just I had parents that were driving it a lot, wanting healthier food choices, and I also could see the writing on the wall, what was going to come down, and it just made sense to start moving on it while we had time, to expose the kids slowly to the change instead of just all of the sudden have to do it. ”*

School food service directors said they didn't feel there was a lot they could do about prices except to be honest with everyone and explain why prices were increasing. Several directors said they needed to convince parents and staff that they were still getting a good value for their money. They suggested that this is best achieved by serving quality products that are well accepted and considered tasty by students, parents, and school staff.

*“If the student takes everything that's offered to them, they really do get a good value compared to other places. ”*

## TECHNICAL ASSISTANCE RECOMMENDATIONS

School food service directors in this study have used a variety of strategies to achieve success in maintaining student participation in school meal programs. Their experiences and approaches provide relevant insights that can be applied in developing training and technical assistance materials. Such materials should focus on the following areas:

1. **Product purchasing:** Offer strategies for identifying and obtaining compliant products that appeal to students.
2. **Providing staff training:** Provide information about hands-on training opportunities for kitchen

<sup>4</sup> Beginning in school year 2014-2015, a school district may participate in CEP if one or more schools meet the 40-percent free or reduced-price eligibility threshold. CEP eliminates the need for individual applications in high-need communities, and qualifies an entire school or schools for free meals. SFAs are reimbursed based on the number of students certified for free meals through means other than individual applications (e.g., direct certification; enrollment in Head Start or Even Start programs; or foster, homeless, migrant, or runaway children).



staff to prepare and serve meals that appeal to students.

3. **Marketing to students:** Offer strategies for introducing, presenting, and marketing healthier food items to students.
4. **Marketing to school personnel and parents:** Offer strategies for addressing concerns of parents, school administrators, staff, and teachers, including responses to frequently asked question, and encour-

aging school administrators, staff, and teachers to be positive role models by supporting the new meal patterns and eating meals with students.

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