

How SNAP and Medicaid Affect Free Meal Access for Public School Students

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Programmatic changes to the Supplemental Nutrition Assistance Program (SNAP) and Medicaid (and the Children's Health Insurance Program, or CHIP) under the One Big Beautiful Bill Act (OBBBA) will directly affect which students can participate in free school meal programs and how much it will cost states to run them. These changes require the following:

- States must take on an additional 25 percent of SNAP administrative costs starting in October 2026.
- States with high SNAP error rates must pay a percentage of benefits starting in October 2027.
- Adults enrolled in Medicaid must meet new work requirements and redetermine enrollment more frequently starting in January 2027.
- Legally present asylum seekers and humanitarian refugees are not federally eligible.

The resulting participation changes and expected cost increases will directly and indirectly change how school meals are paid for. Using the most recent available data, we estimate the following:

- **\$13.7 billion** in additional SNAP administrative and benefit costs will be incurred
- **106,000 refugee and asylee children** have likely lost SNAP and Medicaid benefits and therefore direct certification for school meals

HOW COULD THE ELIMINATION OF BBCE AFFECT STUDENT ACCESS TO SCHOOL MEALS?

Through Broad-Based Categorical Eligibility (BBCE), states can waive asset tests, increase the asset limit, and increase the gross income limit up to 200 percent of the federal poverty level for SNAP eligibility, though the combination of these options depends on the state. If BBCE were eliminated, some previously qualifying households would no longer qualify for SNAP, and those households' school-age children who are not enrolled in Medicaid would lose direct certification for free school meals. Using the most recent available data, we estimate the following:

- **1.3 million school-age children** could lose SNAP benefits if BBCE were eliminated
- **264,000 school-age children** would lose direct certification status

POLICY IMPLICATIONS FOR STUDENTS

Federal social safety net programs have become increasingly integrated with school meal eligibility to reduce administrative burden and to increase verification for free and reduced-price meal access. Any changes that restrict participation in SNAP and increase the costs of Medicaid have downstream effects that affect student access to free school meals.

Nearly two in three public school students attend schools with universal free school meals. Research finds that beyond increasing test scores and graduation rates, universal school meal programs improve food security, student health outcomes, and school climates while reducing disciplinary incidents.

Without direct certification or access to a universal school meal program, income-eligible students may have to return to filling out school meal applications, with some choosing not to because of social stigma. Further, decreases in direct certification counts and tightening of state budgets could raise school meal costs for schools or districts, and some schools may stop offering universal meal programs entirely.

EFFECTS OF THE OBBBA

\$13.7 billion

States could face increasing SNAP administrative and benefit costs

EFFECTS OF ELIMINATING BBCE

1.3 million students

Could lose access to SNAP benefits

264,000 students

Would lose direct certification for school meals because of lost SNAP benefits

28 million students

Attend schools with a universal school meal program and could be affected by the elimination of BBCE and states' responses to the OBBBA



Public Schools Provide Students Free School Meals in Two Ways: Individual Student Access and Universal Student Access

Direct certification reduces families' and schools' administrative burden by determining free meal eligibility using a student's participation in social safety net programs instead of a free meal application.

Federal changes that restrict eligibility and enrollment to social safety net programs (SNAP and Medicaid) threaten access to school meals.

Individual Student Access

The National School Lunch Program and the School Breakfast Program provide free meals to students who live in households that earn up to 130 percent of the federal poverty level (about \$42,900 a year for a family of four).



In an individual-access school, direct certification replaces a student's need to submit a meal application and, as a result,

- reduces administrative burden,
- improves student verification, and
- increases program efficiency.

SNAP

15.6 million children enrolled in 2023*

Medicaid/CHIP

36 million children enrolled in 2025*

Universal Student Access

Schools or districts in low-income areas can offer free school meal programs such as the Community Eligibility Provision that provide free meals to all of a school's students, regardless of eligibility. Currently, nine states subsidize statewide universal free meal programs.



The Community Eligibility Provision depends on direct certification. If a district, group of schools, or school has direct certification rates of



< 25 percent
Cannot offer universal school meals



Between 25 and 62.5 percent
Can offer universal school meals but must cover a portion of the program's cost



> 62.5 percent
Can offer universal school meals and the federal government provides the full reimbursement rate



* = most recent data available