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EXECUTIVE SUMMARY

HERE IS a statement that all in Hawai'i should agree on: No keiki should go to bed hungry. Yet the shocking fact is that one out of every three children in the islands struggles with hunger. To put it another way, five children in an average classroom of 15 go to bed hungry each night in Hawai'i. This is despite:

- Robust national child nutrition programs that provide healthy, low-cost or free meals to children across the nation:
- Annual appropriations of between \$23 million and \$28 million by the State Legislature for the Hawaii Department of Education's School Food Services Branch (SFSB); and
- School and children's programs that offer other meals and snacks that rely on grants, subsidized labor or donations to stay financially afloat.

Hawai'i ranks near or at the bottom of all states and U.S. territories in taking advantage of federal child nutrition programs, including those providing after school suppers, breakfasts, or summer meals. In fact, since 2000, Hawai'i has spent over \$200 million to supplement the federal funding that supports child food programs.

Schools and organizations who participate in these programs are reimbursed by the U.S. Department of Agriculture (USDA) for each qualifying meal served. Hawai'i's rate of reimbursement is set by the federal government and has not been adjusted for over 40 years, other than for inflation. In that time span the gap between mainland and Hawai'i food prices has increased dramatically.

In addition, with the signing of Act 175 of 2021, the Hawai'i State Department of Education is committed to buying more fresh, locally-sourced food, benefiting the health of Hawai'i's students while helping to strengthen Hawai'i's food production market and its resilience.

While current federal reimbursement rates do take into account Hawai'i's high cost of living (allowing for a 17 percent increase over mainland rates), this report shows that Hawai'i's reimbursement rate should actually be 62 percent higher than mainland rates based upon current cost-of-living differences.

Moreover, reimbursement and keiki participation rates will continue to fall further below the true cost of such programs—costs that must be made up by the state or those schools and organizations taking part in the federal programs. In addition, the problem of inadequate reimbursement has been exacerbated by recent improvements to nutritional standards for qualifying school meals that increases their costs and, in some instances, the cost of their preparation as well.

In 2025, the USDA is scheduled to complete its formal School Nutrition Meal Cost Study-II, after which it may increase Hawai'i's reimbursement rates for federal child nutrition programs.

Unfortunately, Hawai'i cannot wait three years or longer for that to happen. Child nutrition programs are one of the best defenses we have to fight hunger, and are often a child's sole source of balanced meals during the day. However, every day, more funding is lost and, each year, sponsoring organizations drop out of the programs. This leaves fewer children who rely on these meals able to get the proper nutrition their growing bodies need.

As a state that takes pride in our support and care for our families and keiki, we cannot let this shortcoming stand as it presently exists. The reimbursement level for schools and sponsors of the programs must be increased as soon as possible, through an emergency federal waiver, supplementary funding from the state, and/or congressional support for faster future adjustments to Hawai'i's reimbursement rate.

Hawai'i needs to do this—for the sake of our children.

INTRODUCTION AND BACKGROUND



The national child nutrition programs help provide nutritionally balanced, low-cost, or free meals to children across the nation. In food-insecure households, these meals can significantly offset food costs and, in some cases, may be the healthiest meals children in these households receive each day.

The primary programs include the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), and the Summer Food Service Program (SFSP).

Organizations participating in the programs receive a reimbursement from the USDA for each qualifying meal served. The maximum amount of reimbursement for each meal varies depending on the program, and in some cases, the child or sponsor's eligibility.

In recognition of the increased costs of providing meals in outlying areas such as Hawai'i and Alaska, federal law provides the USDA with discretion to increase the reimbursement rate for those areas beyond the national average rate. Hawai'i's current rate is set at 17 percent over the National Average Payment (NAP), an adjustment that was set based on a 1979 analysis of food and labor costs in the state. The 1979 analysis—which we replicate in this report using the same national data sources—is the first and only time Hawai'i's rates have been adjusted, over 40 years ago.

HAWAI'I IS FALLING BEHIND

During the 43 years since the original USDA analysis was completed, the gap between mainland and Hawai'i food costs has increased dramatically. On average, the federal free reimbursement rate covers about 85–90 percent of meal production costs, with the rest being made up by other school district revenues or public funds. However, Hawai'i's statewide public school district covers on average only 55 percent of costs with federal reimbursements.

Hawaiʻi is Missing Out on Hundreds of Millions in Federal Funding

Small Businesses

Are Missing

Out

Since 2000, Hawaiʻi has missed out on over \$200 million in funding in the DOE's School Food Services program alone, which operates NSLP and SBP. State general funds currently have to subsidize the DOE School Food Services Branch at between \$20 and \$30 million per year, funding that is not available for other public education priorities.

Hawaiʻi Farmers and

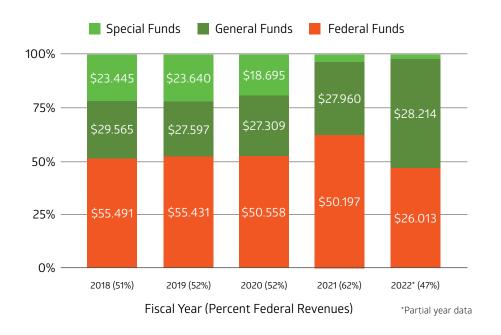
Hawai'i
Children Are
Going
Hungry

One in three keiki in Hawai'i were projected to be food insecure in 2020,² and Hawai'i consistently ranks at the bottom of states for participation in child nutrition programs. Schools and community organizations that do offer the programs have to rely on grants, subsidized labor or parent donations to stay financially viable.

In order to make the most of their budgets, schools prioritize lower-price commodity items over ingredients typically grown by Hawai'i farmers.

Hawai'i is Missing Out on Hundreds of Millions in Federal Funding

Figure 1. School Food Services Branch (SFSB) Budget, By Source



FEDERAL FUNDS ONLY COVER AN AVERAGE OF 55 PERCENT OF SFSB'S ANNUAL BUDGET, A MUCH LOWER PERCENTAGE THAN OTHER DISTRICTS ACROSS THE NATION.

Figure 1. In recent years, in order to continue operating child nutrition programs within Hawai'i's public schools, the Hawai'i State Legislature has been required to appropriate between \$23 and \$28 million for SFSB on an annual basis—funding that is not available to support teachers and student learning. Large school districts like LA Unified and Dade County, Florida are able to operate their programs without receiving this same state operating support.

Other Hawai'i school food authorities, (which include charter and private schools) have to rely on grants, subsidized labor, or parent donations to cover the gap in costs.

Figure 2. Number of School Food Authorities (SFAs) Participating in NSLP in Hawai'i Over Time

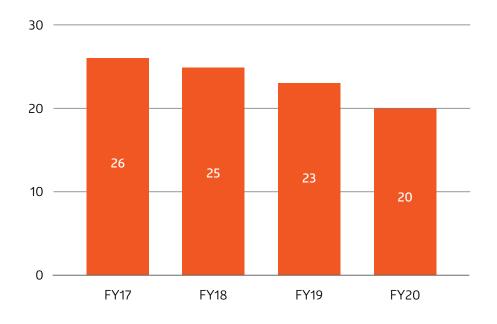




Figure 2. The National School Lunch Program (NSLP) has actually seen a decline in participation through the years due to the high cost burden of participating.

Hawai'i Children Are Going Hungry



Summer Food Service Program



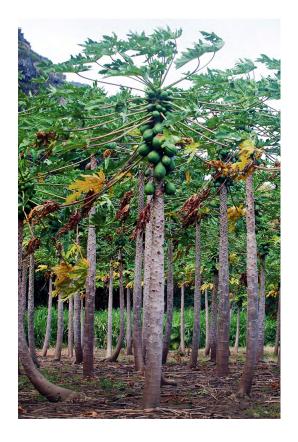
School Breakfast Program



After School Suppers

In addition, Hawai'i consistently ranks at the bottom of all states and territories for participation in the child nutrition programs. According to the most recent data from the Food Research and Action Center (FRAC), Hawai'i was ranked 51st in the nation for the At-Risk Afterschool Supper Program through the Child and Adult Care Food Program (CACFP),³ 44th in the Summer Food Service Program (SFSP),⁴ and 50th for the School Breakfast Program (SBP).⁵

Like school food authorities operating NSLP in Hawai'i, sponsors of these programs have to rely on grant support and parent donations to cover costs of the programs. In fact, Hawai'i currently only has a single At-Risk Afterschool Supper sponsor for the entire state, and they only serve a handful of sites on O'ahu.



Hawai'i Farmers and Small Businesses Are Missing Out

The problem of inadequate reimbursements has been exacerbated by recent changes to nutritional standards for school meals programs, pursuant to the Healthy, Hungry-Free Kids Act of 2010. Under the Act, beginning in SY 2012–13, reimbursable school meals are now required to have healthier ingredients, which can be higher in cost. This includes more fruits and vegetables, and whole-grain-rich carbohydrates, which can now include indigenous starches like 'ulu (breadfruit) and poi (pounded taro root). In addition, these ingredients may require additional labor to process and cook over their pre-packaged counterparts.

While stricter nutritional standards have continued to increase costs for schools throughout the nation, the impact is even more pronounced in Hawai'i because of the inadequacy of the original 1979 reimbursement rate adjustment. Furthermore, in 2021, the Hawai'i legislature passed Act 175, which mandates that 30 percent of meals served be locally sourced by 2030. At Hawai'i's current reimbursement rates, any additional costs will be a major concern for program viability.

MEAL PRODUCTION COSTS IN 2022

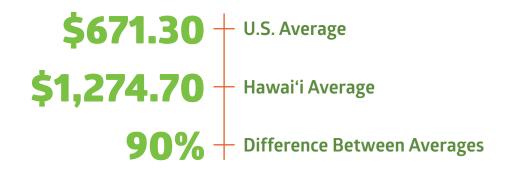
The original USDA analysis examined food and labor costs on the mainland as compared to Hawai'i to determine the appropriate adjustment to Hawai'i's school meal reimbursement rate. After considering five potential data sources for food and labor costs, the USDA settled on two as the most reliable and usable: (1) the USDA's Thrifty Food Plan and (2) the U.S. Department of Commerce's County Business Patterns data. Additionally, based on USDA Food & Nutrition Service information, the USDA determined that food costs comprised roughly 60 percent of meal costs, while labor comprised the remaining 40 percent. Using this data, the USDA determined that Hawai'i's significantly higher labor and food costs justified an increase in Hawai'i's meal reimbursement rates by 17 percent more than mainland rates.

While the USDA's original methodology for calculating the appropriate Hawai'i adjustment to the NAP reimbursement rate remains sound, the costs underlying the data upon which the analysis was based have changed dramatically. As such, the gap between meal preparation costs on the mainland and Hawai'i has widened considerably. In fact, this report demonstrates that—using the same methodology relied upon in the original analysis—the Hawai'i reimbursement should be 62 percent more than the mainland rates.

Food Costs

According to the USDA's Thrifty Food Plan, Hawai'i's food costs have increased exponentially compared to mainland costs since the original analysis. In 2020 (the most recent data available at the time this analysis was conducted), the monthly cost for a family of four in Hawai'i is now 90 percent higher than the national average costs, up from 35 percent in 1979.

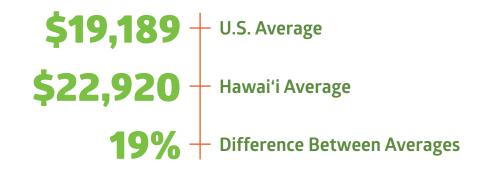
2020 Thrifty Food Plan⁹ Monthly Composite Family of Four



Labor Costs

Labor costs in Hawai'i have also increased disproportionately to those on the mainland, albeit not as dramatically as food costs. According to the 2019 County Business Patterns Data for Eating and Drinking Places (the most recent data available at the time this analysis was conducted) Hawai'i's labor costs are now 19 percent higher than the national average costs.

2019 County Business Patterns Data Food Services and Drinking Places



Total Adjusted Cost of Food and Labor

Our analysis combines the two calculations and weights them using the same ratio used in the original analysis (i.e. food accounts for 60 percent of costs, while labor accounts for the other 40 percent). This yields the final adjustment over mainland rates.

Table 1. School Meal Production Costs, Hawai'i vs. National Average

	Food Costs*	Labor Costs**	Food & Labor Costs Combined
Hawai'i as a Percent of National Average	190%	119%	
Food/Labor Cost Weights***	60%	40%	100%
Hawai'i Weighted As Percent of National Average	114%	48%	162%

*2020 US Department of Agriculture Thrifty Food Plan

**2019 US
Department
of Commerce
County Business
Patterns Data,
Food Services and
Drinking Places

***1979 USDA analysis of school meal production costs

MISSED OPPORTUNITY



Applying this updated adjustment to the current reimbursement rates gives us a full picture of the amount of funding Hawai'i has had to compensate for each year. Using these updated rates, we can see that Hawai'i has missed out on a significant amount of funding over years. This is a plausible explanation for why Hawai'i is consistently ranked toward the bottom of the list for participation in these programs.

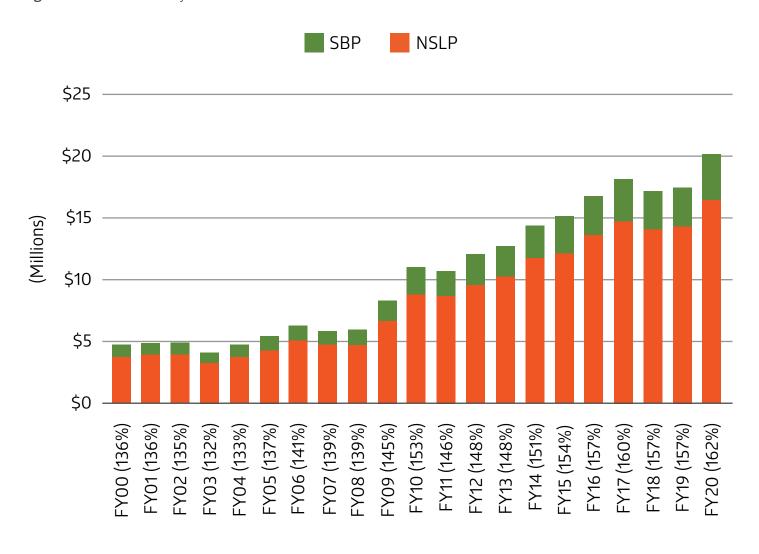
Hawai'i Department of Education (DOE)

By increasing the reimbursement rate to 62 percent over the National Average Payment (per the updated calculations in this report), the Hawaiʻi DOE's School Lunch Program (NSLP) and School Breakfast Program (SBP) could generate an additional \$17 million in federal revenues per year.



Federal revenues the Hawai'i DOE would have received from NSLP and SBP with actual food and labor costs accounted for

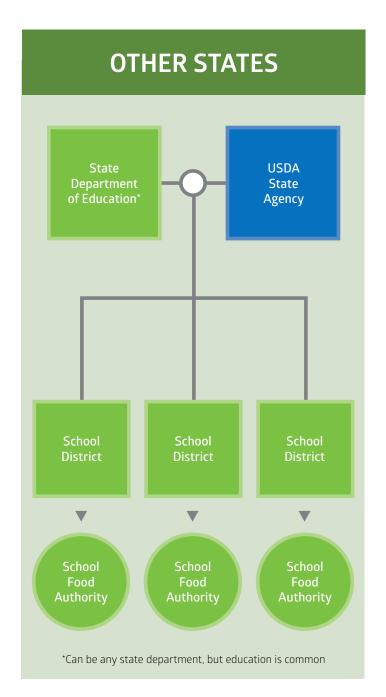
Figure 3. Federal Money Lost Due to 1979 Calculation

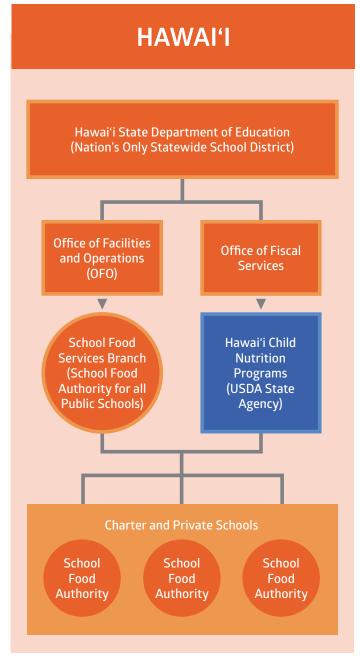


Fiscal Year (Percent Adjustment Over NAP)

Figure 3. The adjusted rates by year, using the same food and labor cost analysis with available annual data. If we add up the years of lost revenue going back to 2000 (21 years of revenue), it comes to a missed opportunity of over \$220 million in child nutrition funding. These are funds that could have gone toward education programs, local food purchases, local businesses, and better quality food for Hawai'i children.

Hawai'i has a Uniquely Challenging Structure





It is relevant to note that Hawai'i is the only state in the nation with a statewide, state-run school district that operates its own school food authority. It is operated by the same entity—the Hawai'i Department of Education—that also operates the USDA state agency, Hawai'i Child Nutrition Programs (HCNP), making it challenging to implement and enforce federal rules. The structure means the two offices often compete for funds, and HCNP has little authority to enforce federal program requirements for this SFA.

"IN FISCAL YEAR 2020–2021 ALONE, THESE TWO PROGRAMS MISSED OUT ON NEARLY \$3 MILLION IN FEDERAL REVENUE."

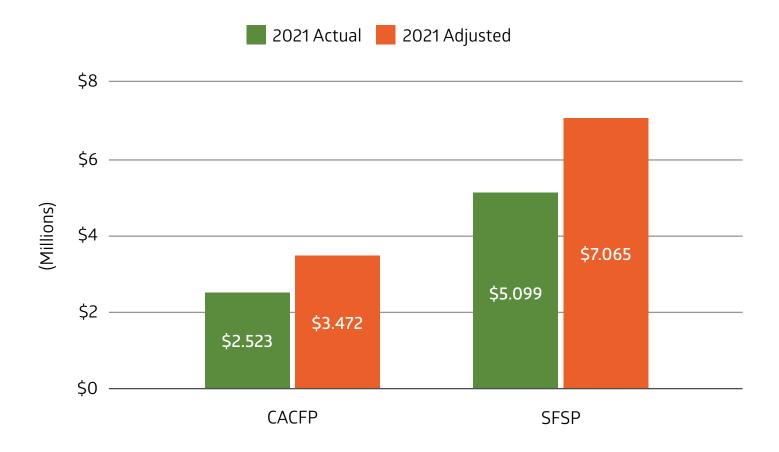
Other Child Nutrition Programs

The Hawai'i DOE is the largest provider of NSLP and SBP in the state, which warrants its own historical analysis. By comparison, other child nutrition programs, including the Child and Adult Care Food Program (CACFP) and the Summer Food Service Program (SFSP) are operated by multiple smaller sponsors.

As such, the availability of historical data for each sponsor was limited. Our analysis was able to look at aggregate data from the most recent year of these two programs, and found that in fiscal year 2020–2021 alone, these two programs missed out on nearly \$3 million in federal revenue.

Note that this is likely an underestimate, as it assumes current participation rates. Higher reimbursements would likely lead to increased program participation. If Hawai'i were to increase participation in these two programs up to the modest goals set by the Food Research and Action Center (FRAC), ¹⁰ the state would draw down an additional \$3 million annually (at current reimbursement rates).

Figure 3. Child and Adult Care Food Program and Summer Food Service Program Lost Revenues



MOVING FORWARD



As shown in the timeline on page 16, Hawai'i advocates have been attempting to remedy this issue for nearly a decade. A 2015 attempt was unsuccessful, with USDA requesting additional data and cost efficiency measures, which the DOE was unable to implement and comply with considering existing staffing and budget constraints.

The USDA is currently planning the second School Nutrition Meal Cost Study (SNMCS-II) that will determine updated per-meal reimbursement rates for Hawai'i, Alaska, Guam, Puerto Rico, and the US Virgin Islands. The methodology of this new study will differ from the 1979 study replicated in this report. The new methodology is intended to provide an accurate assessment of actual school meal costs in both the contiguous and outlying areas to allow a direct comparison. However, the original methodology remains an important indicator of the discrepancy between Hawai'i's current rates and actual costs of running these programs.

Due to COVID-19 delays and related contracting issues, further data collection for SNMCS-II has been postponed until sometime in 2024 or 2025, with results expected sometime in 2026 or 2027. In the interim, we hope that the analysis contained in this report will highlight the unsustainable nature of running these programs in Hawai'i—even in the short term.

In order to mitigate further financial losses, as well as ensure that Hawai'i does not continue to lose program sponsors and continue to fail meeting the nutritional needs of our children, we propose exploring the interim solutions on the next page.



This could include an appropriations request to expedite the timeline for the SNMCS II, or even to cover a reimbursement supplement that would bring Hawai'i's rate to equal of that of 62 percent over the NAP (which is on-par with what Alaska currently receives) while awaiting the results of the USDA's official study. Ideally, this temporary increase would be authorized and administered at the USDA level, thereby streamlining with existing program administration protocols. If that is not feasible, state-level administrative support would also be needed.

USDA Authorization Determine whether waivers that would allow for flexibility in program delivery or supply chain constraints can be applied. In addition, if capacity or funding constraints make it difficult to begin data collection for the SNMCS-II until the 2024–25 school year, explore options, such as a congressional appropriation, in order to begin data collection and analysis immediately.

State General Funds or COVID Relief Funding Until the study can be completed, work with Hawai'i's state legislature to approve a per-meal or flat administrative funding amount to subsidize the current federal rate for all Hawai'i school food authorities and sponsor organizations (currently only the Hawai'i DOE receives a state appropriation).

There is potential to link such an increase into a program that requires purchasing from local producers, in order to meet the state's farm to school goals. However, this would likely require additional systems of measurement and control and administrative capacity for the Hawai'i Child Nutrition Programs office (HCNP).

Engage the Hawai'i DOE

If an interim emergency appropriation cannot be obtained via any of the above strategies, it is critical to ensure that the Hawai'i DOE has appropriate systems of data collection to be able to provide the USDA with the necessary financial information to complete the study, without causing further delays.

MOVING FORWARD: TIMELINE

1979 Original USDA meal cost analysis The USDA uses state-specific food and labor cost data to determine a set adjustment over the National Average Price for Hawai'i, Alaska and other outlying areas. Spring-Summer Hawai'i officials approach the USDA about a reimbursement increase 2015 The original analysis from 1979 was updated and presented to the USDA to request an increase in Hawai'i's adjustment. In July 2015, the USDA sent a formal letter requesting additional data from the DOE, which was never provided. Spring, USDA provides on-site TA for Hawai'i 2016 The USDA provided Hawai'i with on-site technical assistance (TA) to help increase efficiencies and reduce costs for School Food Services Branch. TA included: Procurement practices; Standardized recipes; and Cycle-based menu planning. Sept., USDA follow up letter 2016 The Western Regional Office sent a formal letter encouraging implementation recommendations in lieu of a reimbursement rate adjustment at that time. 2018-2019 USDA conducts data feasibility study USDA conducts a School Nutrition Meal Cost Study II, an Outlying Areas Cost Study (OACS) to assess the feasibility of collecting meal cost data in Alaska, Hawai'i, Guam, Puerto Rico and the U.S. Virgin Islands. 2020-2023 COVID-19 delays data collection for the School Nutrition Meal Cost Study (SNMCS-II) This next phase of the OACS will seek to collect financial data from Hawai'i and other outlying areas. 2024-2025 Data collection to resume 2026-2027 Data cleaning and study results anticipated Beyond Reimbursement adjustment 2027

CONCLUSION



To account for significantly increased meal production costs in Hawai'i versus the mainland, the reimbursement adjustment for Hawai'i needs to be increased from 17 percent to 62 percent above the NAP. The cumulative impact of the increase will be significant, bringing tens of millions of dollars in additional federal meal and snack reimbursements for Hawai'i on an annual basis. That additional amount would substantially reduce the annual state appropriation for school meals, as well as assist the Hawai'i DOE and other meal sponsors in procuring more local and using more scratch cooking methods. In addition, it could help Hawai'i improve its chronically low participation in the child nutrition programs.

We can calculate the total lost federal revenue over the years in operating the state's child nutrition programs if we add up the lost revenues. Hawai'i would have received \$221 million over 21 years from NSLP and SBP for the DOE alone. Other child nutrition programs, including the CACFP At-Risk Afterschool Suppers and Summer Food Service Program, would bring in an additional \$3 million annually, and likely much more due to more sponsors signing on to the program.

As shown in this report, Hawai'i's reimbursement rate for federal child nutrition programs is not adequate to support the programs' viable operation in the islands. The state is falling behind, which means lost federal funding and lack of access to healthy, balanced meals for many Hawai'i children. The updated reimbursement adjustment is necessary to help alleviate some of the cost-burden, thereby ensuring that the program is financially sustainable, can support the state's farm to school goals, and reaches students, whose health and well-being depends on regular access to these balanced meals.

APPENDIX: 1979 USDA STUDY

The <u>analysis</u> conducted by the USDA in 1979¹¹ set out to determine the difference in meal production costs in Hawai'i (among other areas) versus the mainland. The analysis focused on the food and labor components of meal production, which, the USDA recognized, account for over 90 percent of total meal production costs. Based on this, the USDA constructed an index of food and labor costs using the national average as a base of 100.

Data Sources

In creating the index, the USDA examined a variety of data sources including the following:

- 1. USDA Food & Nutrition Service (FNS) form FNS-13, Annual Statement of Income and Expenditures. The FNS-13 contains information on expenditures by state agencies for food, labor, other costs, and donated goods and services. However, the USDA deemed the FNS-13 unreliable for data on food and labor costs since at least some of the information in the statement is based on mere estimations of costs. However, the USDA found that the FNS-13 was the most reliable source of information for computing the ratio of food and labor to total costs. Using this data, the USDA determined that food costs represented 60 percent of the total cost of meal production, while labor represented the remaining 40 percent. The USDA used this ratio for completing the index of food and labor costs for the mainland versus Hawai'i.
- 2. USDA Thrifty Food Plan. The USDA Thrifty Food Plan provides weekly and monthly estimates of the dollar amounts of food needed by a family of four. The Thrifty Food Plan food cost is the weighted average of foods, and dollar amounts are provided and indexed for the U.S. and outlying areas such as Hawai'i. The USDA found that the Thrifty Food Plan was the most reliable source of data out of all the sources considered which could be used for the analysis.
- 3. County Business Patterns Data for Eating and Drinking Places, U.S. Department of Commerce. The County Business Patterns Data for Eating and Drinking Places provides quarterly and annual earnings and numbers of employees.

It provides summary information for the United States and comparable information for individual states including Hawai'i. The USDA determined that this was the best source of labor data of all those considered since it provided the most detailed listing of occupations and earnings data.

Since the original USDA analysis, there is a new federal data source, Occupational Employment and Wage Statistics (OEWS), that has more nuanced wage information on food service, including average wages for institutional and cafeteria cooks and supervisors. Since this data source did not exist at the time of the original analysis, it was not used in the updated analysis in this report. For comparison, the OEWS wage cost data indicates that Hawai'i's labor costs for school food service occupations were 25 percent higher than the national average in 2020, which is even higher than the 19 percent used in this report.

- 4. Estimated Retail Prices by City, Bureau of Labor Statistics, Department of Labor. This report contains average annual prices of selected food items of the Consumer Price Index for Food at home. USDA decided to not use this data source because it only included data on individual food items, not the cost of meals generally, and it did not include weighted averages based on consumption of each food, so it could not be used for a state-by-state comparison. The consumer price index now includes food away from home, specifically meals.
- 5. Survey of Retail Trade, Department of Commerce. The Survey of Retail Trade report publishes wages paid and numbers of employees during one quarter of the year, but concentrated on industrial and manufacturing occupations. The report is not as detailed as the County Business Patterns Data, so it was not used by USDA.
- 6. Area Wage Surveys, Department of Labor. The Area Wage Survey reports include information on a range of major occupational categories. The USDA did not use the reports because there was no U.S. summary from which wages could be compared on a state-by-state basis.

Methodology

After deciding upon using the Thrifty Food Plan data to determine food costs, the County Business Patterns data to determine labor costs, and the FNS-13 data to determine the appropriate weight of each, the USDA used the data to calculate the appropriate meal production cost adjustment for Hawai'i. To do so, the USDA first indexed both the labor and food costs. For example, at the time, the U.S. Average Thrifty Food Plan cost for a family of four was \$165.20, while the cost for Hawai'i was \$222.20. The U.S. Average cost was used as the base of 100. Then the USDA calculated the percentage difference between the National Average cost and the cost for Hawai'i as follows:

Then, by multiplying the percentage by 100 and adding 100, the USDA calculated the Hawai'i indexed food cost of 135: $(35\% \times 100) + 100 = 135$

The labor costs were calculated in the same manner. After determining the indexed costs, the costs were weighted based on the FNS-13 data that showed that food costs comprised roughly 60 percent of meal preparation costs, with labor comprising the remaining 40 percent. For example, Hawai'i's indexed food cost of 135 was multiplied by 60 percent to derive 81. The weighted food indexed cost (81) and labor indexed cost (36.4) were then added to derive a Hawai'i meal preparation indexed cost of 117.4, as indicated in the table on page 20.

Table 2. Food & Labor Costs, Weighted and Unweighted, Hawai'i vs U.S. Continent

	Food		Labor		Average Total	
	Weight = 0.60		Weight = 0.40		Food & Labor	
	Unweighted	Weighted	Unweighted	Weighted	Unweighted	Weighted
U.S.	100	60	100	40	100	100
Hawaiʻi	135	81	91	36.4	118	117.4

ENDNOTES

- 1. USDA: Federal Nutrition Service Western Region
- 2. "The Impact of the Coronavirus on Food Insecurity in 2020," Feeding America, October 2020, https://www.feedingamerica.org/sites/default/files/2020-10/Brief_Local%20Impact_10.2020_0.pdf
- 3. Hayes, Clarissa and Crystal FitzSimons, "Afterschool Suppers: A Snapshot of Participation 2019-2020," Food Research & Action Center, October 2021, https://frac.org/wp-content/uploads/Afterschool-Nutrition-Report-2021.pdf
- 4. Hayes, Clarissa and Crystal FitzSimons, "Hunger Doesn't Take a Vacation: Summer Nutrition Status Report" Food Research & Action Center, August 2020,
- 5. Hayes, Clarissa and Crystal FitzSimons, "School Breakfast Scorecard 2019–2020," Food Research & Action Center, February 2021, https://frac.org/wp-content/uploads/FRAC_BreakfastScorecard_2021.pdf
- 6. Lincoln, Blanche L., S.3307 "Healthy, Hunger-Free Kids Act of 2010," 111th United States Congress (2009–2010), https://www.congress.gov/bill/111th-congress/senate-bill/3307

- 7. Hawaiʻi State House of Representatives, Bill 767 SD2, Thirty-First Legislature of the State of Hawaiʻi (2021–2022), https://www.capitol.hawaii.gov/session2021/bills/HB767_SD2_HTM
- 8. See Appendix: 1979 USDA Study for the full list of data sources used, as well as the methodology.
- 9. In June 2021, the Thrifty Food Plan was updated for the contintental United States, bringing rates to nearly the same level as Hawai'i for a family of four. Updated Hawai'i and Alaska rates will be available sometime in 2022. Therefore, the most recent calculations for Hawai'i are from December of 2020.
- 10. The Food Research & Action Center sets a goal of 15 children receiving afterschool suppers, or 40 children receiving summer nutrition, for every 100 children receiving free or reduced-price NSLP or SFSP lunches in the same month. Hawai'i currently only reaches 0.4 children per 100 with At-Risk Afterschool suppers and 8.7 children per 100 for summer nutrition programs.
- 11. de Ferranti, David, "National Average Payment Adjustments in Alaska, Hawaii, and the Terroritories," United States Department of Agriculture Office of Policy, Planning and Evaluation, June 1, 1979