

# Community Eligibility



October 1, 2013

## A Guide to Implementing Community Eligibility

By Madeleine Levin (Food Research and Action Center) and Zoë Neuberger (Center on Budget and Policy Priorities)

Community eligibility is a powerful new federal option that allows school districts to offer meals at no charge to all students in high-poverty schools. After the first two years of implementation, more than 2,200 schools serving nearly 1 million children have adopted the option in the first seven states that offered it. In schools that have operated under community eligibility for two years, lunch participation increased by 13 percent and breakfast participation increased by 25 percent.

More information about how community eligibility works and the benefits for participating school districts is available in [Community Eligibility: Making High-Poverty Schools Hunger Free](#).<sup>1</sup>

Community eligibility will be available nationwide at the beginning of the 2014-2015 school year. By preparing now, stakeholders can ensure smooth implementation of community eligibility. This model workplan highlights the steps that state agencies, school districts, and advocates can take over the next year to implement community eligibility.

### Promote community eligibility and provide multiple opportunities for school districts to learn about it

It is important to build excitement around this powerful new option and help spread the word about it. States can work with advocates and other stakeholders to help publicize and explain community eligibility. Effective promotion activities include issuing a press release, using social media, offering webinars or conference calls for school districts, and encouraging them to participate in the national webinars being organized by the Food Research and Action Center and the Center on Budget and Policy Priorities. States can also post materials on websites, such as fact sheets, calculators, and sample forms adapted from the excellent materials that participating states already have developed. For example, Illinois and Kentucky have webpages devoted to community eligibility that house a wide assortment of informative materials for school districts.

[Introductory Presentation](#)<sup>2</sup>

[Overview of Community Eligibility](#)<sup>3</sup>

[Sample Opinion Editorial](#)<sup>4</sup>

[Kentucky's Community Eligibility Website](#)<sup>5</sup>

## Improve direct certification systems to locate more Identified Students

Community eligibility is available to any school district with at least one school where 40 percent or more of the students are approved for free meals without an application, known as “Identified Students.” Schools and districts can improve their chances of qualifying for community eligibility or increase their free claiming percentage under community eligibility by using effective strategies to find all Identified Students in the district. Such mechanisms include frequent data matches between student enrollment lists and Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families cash assistance (TANF) data, extending eligibility to all children in households receiving SNAP and TANF benefits, individual student look-ups, and close coordination with homeless liaisons, local shelter directors, migrant education coordinators, foster care agencies, and Head Start agencies to update lists of certified children. In addition, school districts can work with advocates to conduct SNAP outreach to ensure that eligible children are receiving SNAP benefits and to ensure they are counted as Identified Students.

[A Guide to Qualifying Students for School Meals](#)<sup>6</sup>

[Key Steps to Improve Access to Free and Reduced-Price School Meals](#)<sup>7</sup>

[Enrolling All Children in a Household for Free School Meals](#)<sup>8</sup>

[SNAP/Food Stamps Outreach and Access Toolkit](#)<sup>9</sup>

## Set up a workgroup of staff from the state child nutrition agency and different offices within the state education department to address any issues that might arise when school meal applications are not collected

Schools implementing community eligibility no longer collect school meal applications, an important simplification for school nutrition. Most school districts and state education agencies, however, have been using the household income data from school meals applications for purposes in addition to qualifying children for free or reduced-price meals. These purposes include allocating federal, state, and district-level funding and tracking educational progress based upon students’ income. Alternative data sources are readily available to fill these needs, such as the school’s free meal claiming percentage. By establishing a workgroup states can work through the implications of not collecting school meal applications for programs that currently rely on the data. Ideally, this group will be led by a high-level administrator within the state education department who can bring staff together from multiple areas, including school nutrition, Title I, assessment, school funding, accountability, and E-rate. Smaller sub-groups can meet on various issues as needed, with the whole group meeting monthly or even quarterly. States may have an existing workgroup that they can utilize for this purpose or find that once it is set up, it can address other challenges facing the education department. Through careful planning, the states that have implemented community eligibility have been able to resolve issues that arise when schools stop collecting meal applications.

[U.S. Department of Education Letters on Title 1 and Community Eligibility](#)<sup>10</sup>

[Federal Communications Commission Guidance on E-Rate and Community Eligibility](#)<sup>11</sup>

## Prepare to publish lists of eligible schools

By May 1, 2014, and each subsequent year, school districts are required under federal law to submit to state agencies, and state agencies are required to publish, lists of eligible schools (those with Identified Student Percentages of 40 percent or more) and near-eligible schools (those with Identified Student Percentages below 40 percent but at or above 30 percent). States can establish a process for collecting and compiling data on the percentage of children enrolled at each school

who are approved for free meals without an application so they will be ready to publish a statewide list by May 1, 2014. If school districts are not already reporting school-level data, they will need guidance on how to submit the lists or Identified Student Percentage for each school.

[Michigan's eligible districts and schools](#)<sup>12</sup>

## Calculate the financial impact

School districts considering adopting community eligibility will want to calculate its impact on their federal reimbursements and food service revenue. The U.S. Department of Agriculture (USDA) has developed a calculator that allows schools to estimate their federal reimbursements under community eligibility, taking into account anticipated participation increases and meal costs.

[USDA's Community Eligibility Option Federal Reimbursement Estimator](#)<sup>13</sup>

## Determine if district-wide implementation is possible or which schools or groups of schools will participate

Eligibility to participate in community eligibility and participating schools' free claiming percentages must be based on the Identified Student Percentage on or before April 1. Once those are determined, school districts will have to decide whether they can implement community eligibility district-wide or only in certain schools. Schools can participate individually or as part of a group. If schools are grouped, the Identified Student Percentage and claiming percentage are calculated across the entire group for school meal purposes. Schools may be grouped any way a district chooses, such as all elementary schools or all schools in a particular neighborhood. Districts also can group schools based on their Identified Student Percentages to maximize federal reimbursements and to include schools that might not be able to implement community eligibility on their own.

[Community Eligibility Option—Guidance and Procedures for Selection of States for School Year 2013-2014](#)<sup>14</sup>

## Adjust administrative processes

States can facilitate implementation by providing guidance on claiming and reporting for community eligibility schools. School districts planning to implement community eligibility will need to adjust their administrative processes accordingly. In particular, district and state claiming processes must be revised so that claims for meals served in community eligibility schools are based on their free claiming percentage (Identified Student Percentage x 1.6, capped at 100 percent) and meal counts.

[Illinois' Model Meal Count Edit Form](#)<sup>15</sup>

## Sign up

The decision whether to participate in community eligibility lies with each school district, but districts will need to notify the state agency if they will have participating schools. State agencies can facilitate participation by creating a simple form for districts to use to elect community eligibility, like the one Ohio has developed.

[Ohio School District Application for Community Eligibility](#)<sup>16</sup>

## Inform the press and parents

Schools implementing community eligibility have an opportunity to publicize the option using traditional media and social media. They will also need to inform parents that their children will receive free breakfasts and lunches and that they do not need to complete a school meal application. Districts that choose to collect household income information using an alternative form will need to establish new practices for distributing and processing those forms unrelated to school meal program administration.

[West Virginia's Press Release](#)<sup>17</sup>

[Boston Globe Article about Community Eligibility](#)<sup>18</sup>

[Television Coverage of Atlanta's Community Eligibility Implementation](#)<sup>19</sup>

[Ohio's Sample Letter to Households](#)<sup>20</sup>

## References

- <sup>1</sup> See Madeleine Levin and Zoë Neuberger, *Community Eligibility: Making High-Poverty Schools Hunger Free*, Food Research and Action Center and Center on Budget and Policy Priorities, October 1, 2013, [http://frac.org/pdf/community\\_eligibility\\_report\\_2013.pdf](http://frac.org/pdf/community_eligibility_report_2013.pdf).
- <sup>2</sup> The Food Research and Action Center and Center on Budget and Policy Priorities' introductory presentation is available at [http://frac.org/community\\_eligibility\\_presentation.pptx](http://frac.org/community_eligibility_presentation.pptx).
- <sup>3</sup> See *Community Eligibility: An Amazing New Option for Schools*, Food Research and Action Center, October 2013, [http://frac.org/pdf/community\\_eligibility\\_amazing\\_new\\_option\\_schools.pdf](http://frac.org/pdf/community_eligibility_amazing_new_option_schools.pdf).
- <sup>4</sup> The Food Research and Action Center and Center on Budget and Policy Priorities' model opinion editorial is available at [http://frac.org/community\\_eligibility\\_sample\\_oped\\_2013.docx](http://frac.org/community_eligibility_sample_oped_2013.docx).
- <sup>5</sup> Kentucky's community eligibility website is <http://education.ky.gov/federal/SCN/Pages/Community-Eligibility-Option.aspx>. Illinois' community eligibility website is <http://www.isbe.state.il.us/nutrition/htmls/nslp-hhfka-ceo.htm>.
- <sup>6</sup> See *A Guide to Qualifying Students for School Meals*, Food Research and Action Center, Fall 2011, [http://frac.org/wp-content/uploads/2009/09/guide\\_qualifying\\_students\\_schoolmeals\\_2010](http://frac.org/wp-content/uploads/2009/09/guide_qualifying_students_schoolmeals_2010).
- <sup>7</sup> See *Key Steps to Improve Access to Free and Reduced-Price School Meals*, Center on Budget and Policy Priorities, September 6, 2012, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3826>.
- <sup>8</sup> See *Enrolling All Children in a Household for Free School Meals*, Center on Budget and Policy Priorities, June 16, 2010, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3212>.
- <sup>9</sup> See *SNAP/Food Stamps Outreach and Access Toolkit*, Food Research and Action Center, May 2010, [http://frac.org/wp-content/uploads/2009/09/snap\\_outreach\\_access\\_toolkit.pdf](http://frac.org/wp-content/uploads/2009/09/snap_outreach_access_toolkit.pdf).
- <sup>10</sup> See U.S. Department of Education Letter to Chief State School Officers, July 6, 2012, <http://www2.ed.gov/programs/titleiparta/hhfkidsact2012.pdf> and U.S. Department of Education letter to West Virginia Superintendent of Schools, September 25, 2012, [http://frac.org/pdf/usde\\_fiscal\\_accountability\\_guidance\\_policy\\_letter\\_title1\\_andceo.pdf](http://frac.org/pdf/usde_fiscal_accountability_guidance_policy_letter_title1_andceo.pdf).
- <sup>11</sup> See Federal Communications Commission letter explaining the E-rate policy, July 31, 2012, <http://www.fcc.gov/document/universal-service-administrative-company-3>.
- <sup>12</sup> Michigan's list of schools that are eligible for community eligibility is available at [http://www.michigan.gov/documents/mde/2012-2013\\_CEO\\_Eligible\\_Buildings\\_383192\\_7.pdf](http://www.michigan.gov/documents/mde/2012-2013_CEO_Eligible_Buildings_383192_7.pdf) and Michigan's list of schools that are near-eligible for community eligibility is available at [http://www.michigan.gov/documents/mde/2012-2013\\_CEO\\_Near-Eligible\\_Buildings\\_383194\\_7.pdf](http://www.michigan.gov/documents/mde/2012-2013_CEO_Near-Eligible_Buildings_383194_7.pdf). Illinois' list of schools that are eligible and near-eligible for community eligibility is available at <http://www.isbe.net/nutrition/pdf/nslp-hhfka-ceo-outreach-sy13-14.pdf>.
- <sup>13</sup> The U.S. Department of Agriculture's calculator is available at <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013a2.xls>.
- <sup>14</sup> See Food and Nutrition Service Memorandum, *Community Eligibility Option: Guidance and Procedures for Selection of States for School Year 2013-2014*, U.S. Department of Agriculture, December 7, 2012, Attachment B, Question 4, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013os.pdf>.
- <sup>15</sup> Illinois' model meal count edit form is available on the state's community eligibility website at <http://www.isbe.net/nutrition/htmls/nslp-hhfka-ceo.htm>.
- <sup>16</sup> Ohio's form that school districts use to apply for community eligibility is available at <http://education.ohio.gov/getattachment/Topics/Other-Resources/Food-and-Nutrition/Resources-and-Tools-for-Food-and-Nutrition/Community-Eligibility-Option/CEO-SFA-participation-form-2013-2014.doc.aspx>.
- <sup>17</sup> An example of a press release, issued by West Virginia, is available at <http://wvde.state.wv.us/news/2547/>.
- <sup>18</sup> See James Vaznis, "Without paperwork, school lunch free in Boston—Officials seize opportunity to join new federal meal program," *The Boston Globe*, September 3, 2013, <http://www.bostonglobe.com/metro/2013/09/02/boston-public-schools-will-offer-free-lunches-all-students/2aaUy5sxJjIak9ndGDHxkJ/story.html> and related tweet from U.S. Secretary of Education, Arne Duncan at <https://twitter.com/arneduncan/status/374947461330386944>.
- <sup>19</sup> A television story about the Atlanta public schools implementing community eligibility can be viewed at <http://www.myfoxtlanta.com/story/22902022/tues-free-school-lunchs-beasley>.
- <sup>20</sup> Some states, including Illinois, Michigan, and Ohio, provide a sample letter that school districts may use. Illinois' letter is available at [http://www.isbe.net/nutrition/word/ceo\\_sample\\_ltr.docx](http://www.isbe.net/nutrition/word/ceo_sample_ltr.docx). Michigan's letter is available at [http://www.michigan.gov/documents/mde/CEO\\_Sample\\_Letter\\_to\\_Households\\_-\\_ts\\_final\\_360765\\_7.doc](http://www.michigan.gov/documents/mde/CEO_Sample_Letter_to_Households_-_ts_final_360765_7.doc). Ohio's letter is available at <http://education.ohio.gov/getattachment/Topics/Other-Resources/Food-and-Nutrition/Resources-and-Tools-for-Food-and-Nutrition/Community-Eligibility-Option/2013-2014-CEO-Sample-letter-to-households.doc.aspx>.