

Community Eligibility

Making High-Poverty Schools Hunger Free

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Community Eligibility: Making High-Poverty Schools Hunger Free

Executive Summary

“Community eligibility” is a powerful new tool to ensure that low-income children in high-poverty neighborhoods have access to healthy meals at school. Established in the Healthy, Hunger-Free Kids Act of 2010, the option allows schools in high-poverty areas to offer nutritious meals through the National School Lunch and School Breakfast Programs to all students at no charge. More than 2,200 high-poverty schools serving nearly 1 million children in seven states – one in ten children across these states – operated under community eligibility during the 2012-2013 school year.

Community eligibility is making a profound difference for students and schools. Findings from Illinois, Kentucky, and Michigan, where school districts first implemented the option in the 2011-2012 school year, show ongoing growth in the number of schools choosing community eligibility and a striking increase in the number of students eating school breakfast and lunch.

- The number of schools in Illinois, Kentucky, and Michigan choosing community eligibility nearly doubled in the second year in which the option was available, growing 86.5 percent from 665 schools in the 2011-2012 school year to 1,240 schools in the 2012-2013 school year, and is expected to increase further as more schools learn about its benefits.
- In schools in those three states that have participated in community eligibility for two years, lunch participation rose by 13 percent, which resulted in more than 23,000 additional children eating lunch daily, and breakfast participation has increased by 25 percent, which resulted in more than 29,000 additional children eating breakfast daily.

Such increases in participation underscore the impact of community eligibility and its ability to improve low-income children’s access to healthy meals at school, particularly through the School Breakfast Program, which has been underutilized. Administrators, child nutrition staff, and parents in participating schools, who experience the benefits of community eligibility first hand, have enthusiastically embraced the option. Community eligibility helps low-income families, high-poverty schools, and the school meals programs by:

- **Improving access to free school meals**, so parents can count on their children eating two healthy meals each day at school, helping to stretch families’ limited food budgets;
- **Eliminating school meal applications**, freeing up resources that schools can use to improve the quality of school meals and freeing up time that staff can devote to other important educational functions; and

- **Making school nutrition operations more efficient**, which strengthens school nutrition programs financially and enables schools to more easily implement alternative service models such as breakfast in the classroom.

The first two years of community eligibility provide valuable lessons learned, best practices, and user-friendly resource materials. As schools and states look ahead to the nationwide implementation of community eligibility in school year 2014-2015, the following steps will facilitate a successful transition:

- **Promote community eligibility and provide multiple opportunities for school districts to learn about it.** States, districts, advocates and other stakeholders can work together to publicize the new option. Effective promotional activities include issuing a press release, offering webinars or conference calls, and posting materials on websites, such as fact sheets, calculators, and sample forms adapted from the excellent materials that participating states already have developed.
- **Improve direct certification systems** and procedures to identify children who are automatically eligible for free school meals, without a paper application, the number of whom is the basis for reimbursements under community eligibility. Such children include those who are in foster care or Head Start, are homeless, are migrant, or are living in households that receive Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps) benefits, Temporary Assistance for Needy Families (TANF) cash assistance, Food Distribution Program on Indian Reservations (FDPIR) benefits, or Medicaid in areas approved for the U.S. Department of Agriculture's (USDA) Medicaid Direct Certification Demonstration Projects. These certification improvements will help school districts accurately determine which schools are eligible and can increase their free claiming percentage under community eligibility.
- **Identify and address implications of eliminating school meal applications.** States can set up a work group of relevant staff – such as school nutrition, Title I, assessment, school funding, accountability, and E-rate – to start identifying and addressing any issues that might arise when school meal applications are not collected.
- **Prepare to publish lists of eligible schools.** 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 of schools eligible for community eligibility (and those near-eligible) by May 1, 2014 as required.

This report analyzes the scope and impact of community eligibility in the seven states that implemented it in the 2011-2012 and 2012-2013 school years. (Four more states are starting in the 2013-2014 school year.) It is meant to serve as a guide for states and school districts as the nationwide rollout of community eligibility approaches. It explains and provides resources related to how community eligibility works, how it helps participating schools and families, how to operate without school meal applications, and how stakeholders can prepare to implement the option when it becomes available in all states for the 2014-2015 school year.

Introduction

Community eligibility is a successful new option provided by federal law to districts and schools for offering meals at no charge to all students in high-poverty schools. More than 2,200 schools in the first seven states with the option have already adopted it.

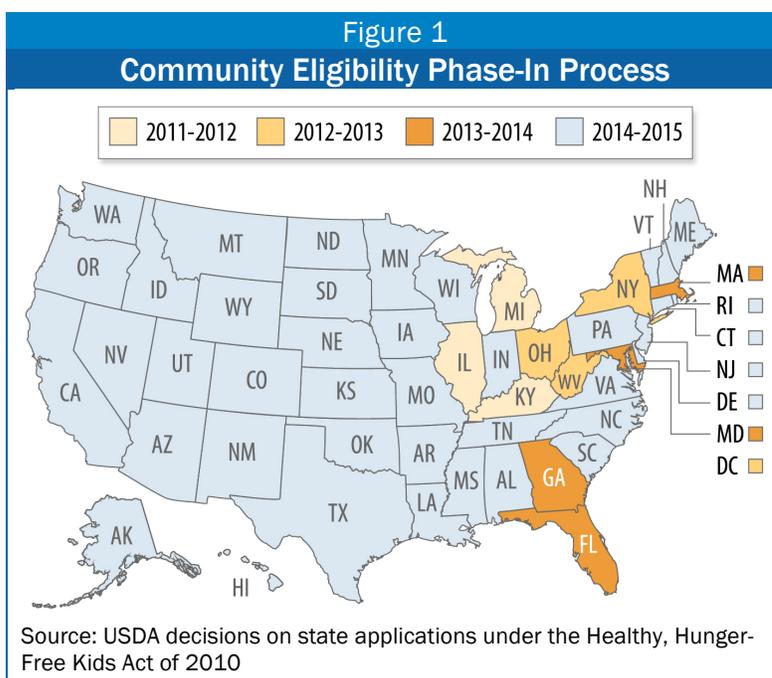
Established in the Healthy, Hunger-Free Kids Act of 2010, it allows schools that predominantly serve low-income children to feed many more children and to realize administrative savings, thereby making it cost-effective to provide all breakfasts and lunches at no charge.¹ Offering meals at no charge to all students ensures that all children can receive healthy school meals, helps families struggling to put food on the table at home, and reduces stigma often associated with eating school meals or being identified as receiving a free or reduced-price meal. It strengthens school nutrition programs by reducing administrative costs and increasing participation, which in turn improves educational outcomes for students and improves children's nutrition.²

Under the National School Lunch and School Breakfast Programs, schools typically must collect and process individual household applications to assign each child to one of the three income eligibility categories (free, reduced-price, and paid) that determine the federal reimbursement level they receive for each meal served. The federal school meals programs provide a per-meal reimbursement to schools for all meals that meet federal nutrition requirements; the reimbursement is higher for meals served to children who qualify for free or reduced-price meals. (See Appendix A.)

In contrast, community eligibility schools do not collect or process individual meal applications for each family or track children by income in the cafeteria. Instead, they serve all breakfasts and lunches at no charge and are reimbursed through a formula based on the number of low-income students who are automatically eligible for free school meals without a paper application.

Community eligibility increases school meal participation, which can reduce food insecurity for many of the nearly 16 million American children living in households that have trouble affording enough nutritious food. This in turn helps low-income families stretch their limited food resources. Community eligibility helps school nutrition programs by reducing administrative costs while sometimes increasing revenues as a result of increases in school meal participation, allowing them to make needed nutrition improvements to school menus.

Community eligibility has been phased in a few states at a time since the 2011-2012 school year, and is now available in 11 states: the District of Columbia, Florida, Georgia, Illinois,



Kentucky, Maryland, Massachusetts, Michigan, New York, Ohio, and West Virginia.³ Beginning in the 2014-2015 school year, all school districts nationwide that meet the criteria will be able to participate.⁴ (See Figure 1.)

High-poverty schools around the country can benefit from community eligibility. By taking steps now to prepare to implement the option for the next school year (2014-2015), states and school districts can realize the benefits of community eligibility as soon as possible.

This report analyzes participation in the seven states that implemented community eligibility in the 2011-2012 and 2012-2013 school years. It provides information for school nutrition administrators and other stakeholders to help them implement community eligibility in the coming year. This report also provides links to resources, such as federal guidance and state materials, which can serve as models for states and school districts preparing for implementation.

Key Community Eligibility Terms

- **Identified Students:** Children who already are automatically eligible for free school meals (prior to community eligibility), without a paper application, because they are in foster care or Head Start, are homeless, are migrant, or are living in households that receive Supplemental Nutrition Assistance Program (SNAP, formerly known as Food Stamps) benefits, Temporary Assistance for Needy Families (TANF) cash assistance, Food Distribution Program on Indian Reservations (FDPIR) benefits, or Medicaid in areas approved for USDA's Medicaid Direct Certification Demonstration Projects.
- **Identified Student Percentage:** The number of Identified Students divided by total school enrollment.
- **Direct certification:** The process by which schools locate Identified Students using data from other programs, either by matching databases or by obtaining lists of eligible students from appropriate officials.
- **1.6 multiplier:** Identified Students are a subset of those students who are eligible for free or reduced-price meals. The 1.6 multiplier reflects the typical ratio between Identified Students and all students certified for free or reduced-price meals in schools and school districts. To estimate the share of students who would be approved for free or reduced-price meals if the school were not participating in community eligibility, the 1.6 multiplier is applied to the Identified Student Percentage, and the resulting number determines the free claiming percentage.
- **Free claiming percentage:** The percentage of school meals eaten by students that the school district may claim for reimbursement by federal school meals programs at the free reimbursement rate. The free claiming percentage is obtained by multiplying the Identified Student Percentage by the 1.6 multiplier. It is capped at 100 percent.
- **40 percent threshold:** The community eligibility option is available to schools in which the Identified Student Percentage is 40 or higher.

- [Section 1 explains how community eligibility works.](#)
- [Section 2 discusses its benefits for students and schools.](#)
- [Section 3 describes the reach of community eligibility to date and the characteristics of participating schools.](#)
- [Section 4 examines how community eligibility has increased school meal participation.](#)
- [Section 5 explains how states and school districts eliminated school meal applications.](#)
- [Section 6 describes how community eligibility schools participate in other federal, state, and local programs without data from school meal applications.](#)
- [Section 7 illustrates how advocates, school district staff, and state administrators can prepare to implement community eligibility.](#)

Section 1: How Community Eligibility Works

Ordinarily, schools that participate in the National School Lunch and Breakfast Programs collect and process applications from families to determine which students are eligible for free or reduced-price meals. Schools are also required to automatically enroll students for free meals, without an application, when they live in a household that receives Supplemental Nutrition Assistance Program (SNAP) benefits. They also may enroll for free meals, without an application, children who receive other means-tested public benefits or are especially vulnerable, such as homeless children. Meals served to students who qualify for free meals receive the highest rate of reimbursement from the federal government.

Community eligibility gives high-poverty schools a more sensible and streamlined alternative.⁵ It does not make sense for schools that predominantly serve low-income children to go through the time-consuming, labor-intensive process of trying to collect applications from everyone in order to identify the relatively small group of children who do *not* qualify for free or reduced-price meals. Community eligibility reduces barriers to participation, creates hunger-free schools for vulnerable children, and allows school nutrition programs in resource-deprived schools to reduce administrative costs and possibly increase revenues, enabling them to make needed nutrition improvements to school menus.

Rather than taking applications to make individual eligibility determinations and tracking each student in the cafeteria to ensure that the school claims the appropriate reimbursement, community eligibility schools offer breakfast and lunch to all students at no charge and receive federal reimbursements based on their number of students certified for free meals without a paper application because they have been identified as eligible for other need-based programs.

“Identified Students” are those who are automatically eligible for free school meals, without a paper application, because they: are in foster care or Head Start; are homeless; are migrant; or are living in households that receive SNAP benefits, TANF cash assistance, FDPIR benefits, or Medicaid in areas approved for USDA’s Medicaid Direct Certification Demonstration Projects.⁶ These children are identified through “direct certification,” which relies on data matching, or certification by an appropriate official who has assessed family circumstances to determine eligibility for homeless, migrant, foster care, or Head Start services.

Community eligibility will be available to all schools where 40 percent or more of the students are Identified Students as of April 1 of the previous school year. This includes any public, private, and charter schools that participate in the National School Lunch Program. As Box 1 explains, states are required to publish lists of eligible and near-eligible schools.

School districts can increase the likelihood that their schools qualify for community eligibility by using all available mechanisms to identify students, as described in Box 2. These mechanisms include conducting additional data matches throughout the school year, identifying all children in the household, utilizing individual look-up functions to match more children, and working with homeless liaisons, local shelter directors, migrant education coordinators, foster care agencies, and Head Start agencies to update lists of certified children. School district staff and anti-hunger advocates can also conduct outreach to low-income families in the district who may be eligible for SNAP but are not enrolled.⁷

Box 1. Which Schools Are Eligible for Community Eligibility

Community eligibility will be available to all school districts containing at least one school with 40 percent or more “Identified Students” — students who are automatically eligible for free school meals, without a paper application, because they are in foster care or Head Start, are homeless, are migrant, or are living in households that receive SNAP benefits, TANF cash assistance, FDPIR benefits, or Medicaid in areas approved for USDA’s Medicaid Direct Certification Demonstration Projects. These children are identified through a data matching process known as direct certification or by an appropriate school district official who has assessed family circumstances to determine eligibility for another program. Identified Students are only a subset of those who qualify for free or reduced-price meals. Typically, at least 65 percent of the students at schools eligible for community eligibility qualify for free or reduced-price meals.

Under federal law, by May 1, 2014, every state must publish lists of all schools that are eligible for community eligibility and of all schools that are near-eligible (meaning that between 30 percent and 40 percent of their students are Identified Students).

Because states implementing community eligibility during the phase-in period have conducted extensive outreach to districts with eligible and near-eligible schools, USDA has not enforced the May 1 deadline for publishing lists. To date, the District of Columbia, Illinois, Michigan, and Ohio have published lists for the 2013-2014 school year.

- District of Columbia eligible districts and schools: http://osse.dc.gov/sites/default/files/dc/sites/osse/service_content/attachments/SY%2013-14%20DC%20Schools%20Eligible%20for%20CEO.pdf
- Illinois eligible and near-eligible districts and schools: <http://www.isbe.net/nutrition/pdf/nslp-hhfka-ceo-outreach-sy13-14.pdf>
- Michigan eligible districts and schools: http://www.michigan.gov/documents/mde/2012-2013_CEO_Eligible_Buildings_383192_7.pdf
- Michigan near-eligible districts and schools: http://www.michigan.gov/documents/mde/2012-2013_CEO_Near-Eligible_Buildings_383194_7.pdf
- Ohio data that allows schools to calculate whether they are eligible or near-eligible: ftp://ftp.ode.state.oh.us/MR81/MR81_October_2012/MR81%20CEO/MR81%20CEO%20Text%20File.txt

It is important to keep in mind that Identified Students are only a subset of those who qualify for free or reduced-price meals. For example, many families are eligible for SNAP but not enrolled, and direct certification may miss some students who are enrolled. Schools that qualify for community eligibility based on meeting the 40 percent rule usually have 65 percent or more of their students approved for free or reduced-price meals.

Because a school’s Identified Student Percentage (the share of its students who are Identified Students) does not fully represent its share of children who qualify for free or reduced-price meals, the federal rule is that schools multiply that percentage by 1.6 to obtain the percentage of their meals (capped at 100 percent) for which they will claim federal reimbursement at the free rate.⁸ Thus, if 50 percent of students are Identified Students, 80 percent of meals would be reimbursed at the free rate. The rest of their meals are reimbursed at the paid rate. If at least 62.5 percent of students are Identified Students, all meals would be reimbursed at the free rate. (See Appendix A for

more information on reimbursement rates.) USDA has created a calculator that school districts can use to estimate their reimbursement under community eligibility.⁹

Community eligibility schools are guaranteed at least the same free claiming percentage for four years once they adopt community eligibility.¹⁰ If the Identified Student Percentage increases as the school district continues to conduct direct certification during the community eligibility cycle, the free claiming percentage increases accordingly. If the Identified Student Percentage decreases, the original free claiming percentage remains in effect through the remainder of the four-year cycle.

Box 2. Best Practice: Steps to Detect Identified Students

Schools and districts can increase the likelihood that they qualify for community eligibility by using all available mechanisms to identify students who are in foster care or Head Start, are homeless, are migrant, or are living in households that receive SNAP benefits, TANF cash assistance, FDPIR benefits, or Medicaid in areas approved for USDA's Medicaid Direct Certification Demonstration Projects. Identifying more of these students will also increase a school's free claiming percentage under community eligibility. The following steps could help school districts discover Identified Students not previously known to them.

- Conduct a match between the student database and the SNAP/TANF database on or close to April 1, the deadline for counting Identified Students.
- Identify additional students in households with children who have been identified as receiving SNAP, TANF cash assistance, or FDPIR benefits and use extended categorical eligibility to directly certify *all* children in the household.
- Use individual look-up functions built into direct certification systems to directly certify children whose school meal application lists a case number for SNAP, TANF cash assistance, or FDPIR benefits or children otherwise known to be receiving one of these benefits.
- Work with homeless liaisons, local shelter directors, migrant education coordinators, foster care agencies, and Head Start agencies to update lists of children who are categorically eligible for free school meals without a paper application.
- Work with advocates to conduct SNAP outreach to low-income families in the district who may be eligible but not enrolled.

For more information see:

- *A Guide to Qualifying Students for School Meals*, Food Research and Action Center, http://frac.org/wp-content/uploads/2009/09/guide_qualifying_students_schoolmeals_2010
- *Key Steps to Improve Access to Free and Reduced-Price School Meals*, Center on Budget and Policy Priorities, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3826>
- *Enrolling All Children in a Household for Free School Meals*, Center on Budget and Policy Priorities, <http://www.cbpp.org/cms/index.cfm?fa=view&id=3212>
- *SNAP/Food Stamps Outreach and Access Toolkit*, Food Research and Action Center, http://frac.org/wp-content/uploads/2009/09/snap_outreach_access_toolkit.pdf

Any school district with at least one school with an Identified Student Percentage of 40 percent or more can participate in community eligibility beginning with the 2014-2015 school year. School districts choose whether qualifying schools will participate in community eligibility individually, as part of a group, or district-wide. If schools are grouped, the Identified Student Percentage and free

claiming percentage are calculated across the entire group. Schools may be grouped any way a district chooses, including combining schools with Identified Student Percentages that are lower and higher than 40 percent, so long as the group as a whole has an Identified Student Percentage of 40 percent or more. If the district chooses to implement community eligibility district-wide, the Identified Student Percentage at the district level must be at least 40 percent. (See Box 3 for an example.) Eligible school districts must notify states by June 30 if they intend to participate in community eligibility for the following school year.¹¹

Under a separate provision of the Healthy, Hunger Free Kids Act of 2010, school districts that generate less revenue for each paid lunch than for each free lunch must gradually close the gap between the two — by raising prices by 5 or 10 cents per year or by increasing non-federal revenue.¹² Some districts (even high-poverty ones) choose to increase their paid lunch prices by more than this amount.¹³ Some families who do not qualify for free or reduced-price meals may have trouble making ends meet, including those that attend high-poverty schools. Schools that participate in community eligibility serve all meals at no charge and are exempt from these revenue requirements. Participating in community eligibility ensures these schools that they will not be required to increase lunch prices or non-federal revenue.

Box 3. Grouping Schools Based on Their Identified Student Percentages

School districts choose whether qualifying schools will participate in community eligibility individually, as part of a group, or district-wide. If schools are grouped, the Identified Student Percentage and free claiming percentage are calculated across the entire group. Schools may be grouped any way a district chooses, as long as the group as a whole has an Identified Student Percentage of 40 percent or higher.

Districts can group schools in order to maximize federal reimbursements. One way to achieve this is to rank them by their Identified Student Percentage and form a group based on the free claiming percentage for the group as a whole.

The example below lists four schools in a hypothetical district. The first four rows indicate the Identified Student Percentage and free claiming percentage for each school if it were to participate individually in community eligibility. If these schools participated individually in community eligibility, Schools A, B, and C would be able to claim 92 percent of their meals at the free rate and School D would be able to claim 85 percent of its meals at the free rate.

The last row indicates the Identified Student Percentage and free claiming percentage if the schools were to participate in community eligibility as a group. All four schools would be able to claim 90 percent of their meals at the free rate.

By using Identified Student Percentages to group schools, school districts may be able to help low-income schools participate in community eligibility that might not receive adequate federal reimbursements if they participated individually.

	Identified Students	Enrolled Students	Identified Student Percentage	Free Claiming Percentage
Participating Individually				
School A	196	340	58%	92%
School B	99	172	58%	92%
School C	116	201	58%	92%
School D	152	287	53%	85%
Participating as a Group				
Schools A-D	563	1,000	56%	90%

For more information see:

- *Community Eligibility Option: Guidance and Procedures for Selection of States for School Year 2013-2014*, USDA, December 7, 2012, Attachment B, Question 1, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013os.pdf>

Section 2: Key Benefits for Students and Schools

The National School Lunch and School Breakfast Programs are important education and health resources for schools, ensuring that their students have access to healthy breakfasts to start the school day ready to learn and nutritious lunches to remain focused throughout the day. These programs are particularly important in schools that serve large numbers of children whose families are struggling to put food on the table. Community eligibility can transform the way schools in high-poverty communities offer meals, ensuring that more students experience the educational, behavioral, and health benefits of participating in the school nutrition programs and in turn supporting schools' efforts to improve student achievement and build a better educational environment for their students.

Districts that have implemented community eligibility praise it highly. Every school district interviewed after participating in community eligibility for a year stated that it would recommend the option to similar low-income schools.¹⁴ Parents and school staff in these districts also enthusiastically support community eligibility. Some of the key benefits are described below.

Increased Access to Healthy Meals

Low-income students miss out on school meals for a variety of reasons, including literacy and language barriers to filling out school meal applications, concerns about being identified as low-income, lack of time to eat during meal periods, or arriving at school after breakfast has been served. By offering meals free to all students, community eligibility helps high-poverty schools overcome the participation barriers to school meals. More students eating reduces the stigma associated with the program, which means that more low-income students are likely to eat.

Parents are assured that students can eat two healthy, nutrient-dense meals a day at school, which helps stretch families' limited food budgets and could reduce food insecurity. The food children receive in the school meal programs must meet science-based nutrition standards, and is generally of higher nutritional quality than the food they receive from home, or choose for themselves outside of the school meal programs. Students with reliable access to better nutrition tend to eat better and perform better academically.¹⁵

Less Paperwork for Families and Schools

At community eligibility schools, families have one less form to fill out and staff no longer have to collect, certify, or verify applications, which is a time-consuming process for school districts. Instead they rely on the robust eligibility assessments conducted by other programs, which allows them to focus on educating and feeding children rather than on paperwork. The reduction in administrative work frees up resources that schools can use to improve the quality of school meals or the cafeteria environment; it also frees up time that schools can devote to other important educational functions.

More Cost-Effective

At community eligibility schools, staff no longer handle school breakfast or lunch payments in the food line because there are no fees to collect. This makes school meal operations more efficient as serving lines move more quickly because students no longer have to enter codes or swipe school ID cards. Children spend less time waiting in line and have more time to eat, which overcomes participation challenges often exacerbated by shortened meal periods. Community eligibility also makes it easier for schools to adopt alternative service models such as breakfast in the classroom, which can increase participation by making meals more convenient for students. Moreover,

increased participation allows schools to maximize economies of scale, bringing down the cost per meal. As schools realize these cost savings, resources are freed up to invest in improving meal quality, as required by new school meal nutrition standards. Further, meeting these standards allows schools to access an additional 6 cents for each lunch served which gives a much-needed boost to the school nutrition budget.¹⁶

Innovative Breakfast Models

Participation in the School Breakfast Program lags behind school lunch participation, typically serving only half of the low-income children who eat lunch at school. With community eligibility, the universal free meals and simplified meal counting and claiming make it easier to offer breakfast in the classroom and other alternative breakfast service models. A wide body of research shows that implementing an alternative breakfast model — offering the meal after the school bell and not in the cafeteria — is the most effective means to increase participation and achieve the gains in academic success linked to school breakfast consumption.¹⁷ Schools can use a variety of methods, including breakfast in the classroom, “grab and go,” and breakfast after first period. Allowing students to eat in the classroom during the first ten minutes of class makes it convenient and accessible to all while helping families whose early morning schedules make it difficult to fit in breakfast at home. Also, it alleviates the problem of students missing breakfast in the cafeteria for any number of reasons, including school bus schedules or long school security lines.

Section 3: Thousands of Schools Have Successfully Implemented Community Eligibility

In the seven states that have implemented community eligibility, many schools have chosen the option, resulting in nearly 1 million children attending a community eligibility school. In the three states that have had the option for two years, the number of schools participating nearly doubled between the first and second year, substantially increasing the share of students statewide who attend community eligibility schools and have access to free breakfasts and lunches.¹⁸

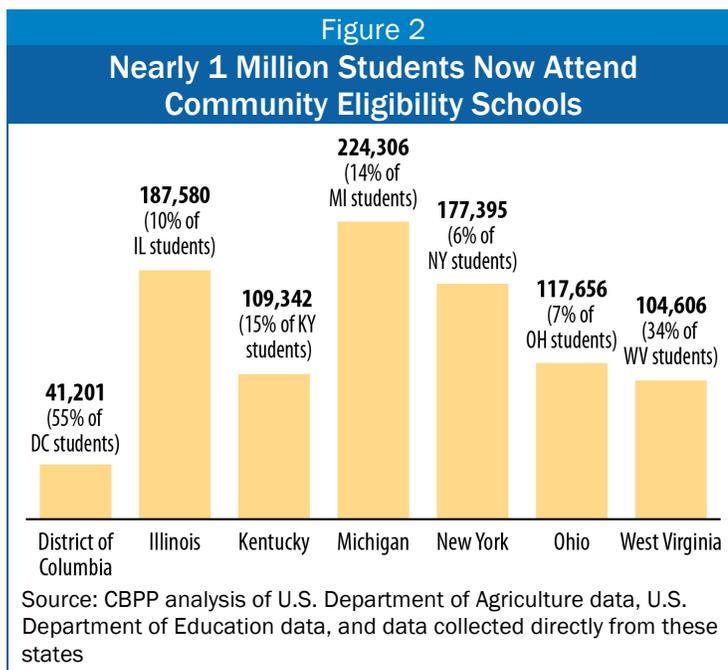
The Scope of Community Eligibility

For the 2012-2013 school year, 2,273 schools in the first seven states, with enrollment of more than 960,000 students, served all meals free through community eligibility.¹⁹ (See Table 1.) About 10 percent of all students in these seven states attended community eligibility schools. The smallest states had much higher percentages: 55 percent in the District of Columbia and 34 percent in West Virginia. (See Figure 2.)

State	Number of Community Eligibility Schools
District of Columbia	122
Illinois	454
Kentucky	267
Michigan	519
New York	326
Ohio	303
West Virginia	282
Total	2,273

Community eligibility has been available in Illinois, Kentucky, and Michigan since the start of the 2011-2012 school year. The District of Columbia, New York, Ohio, and West Virginia began offering the option for the 2012-2013 school year. (Florida, Georgia, Maryland, and Massachusetts began offering the option for the 2013-2014 school year.)

In Illinois, Kentucky, and Michigan, participation nearly doubled between the first and second years of implementation, from 665 schools serving approximately 285,000 students in the 2011-2012 school year to 1,240 schools serving 520,000 students in the 2012-2013 school year. (See Figure 3). Across these three states, about two in five eligible schools now participate in community eligibility, a major success for these early adopters. (Participating schools represent 12 percent of all schools across these three states.)



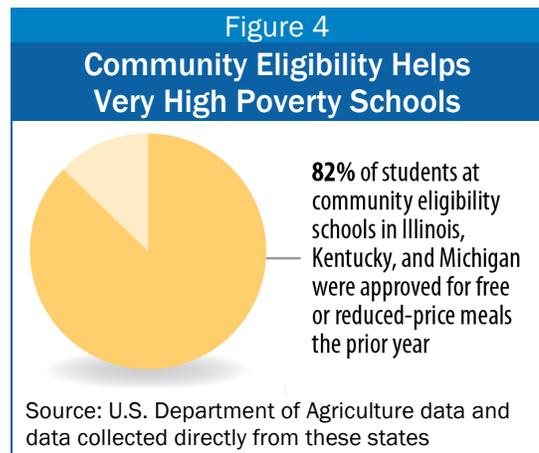
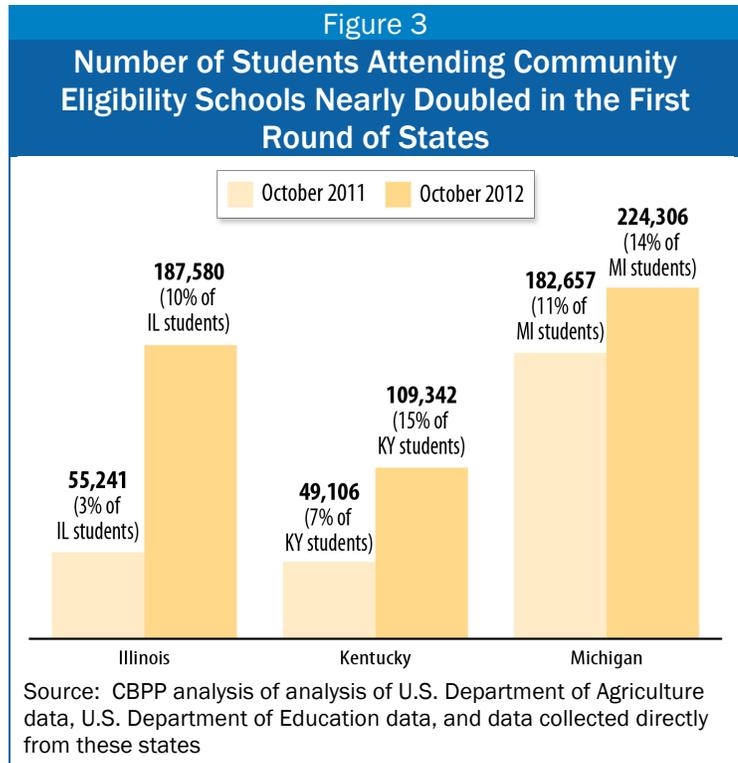
The share of students in these states participating in community eligibility jumped from about 7 percent to about 12 percent between the first and second years. The rapid growth likely resulted

from schools and districts learning about the benefits of community eligibility from schools that had already implemented the option, and signing up so they could offer universal free meals too.²⁰

Characteristics of Schools Implementing Community Eligibility

In the year prior to implementing community eligibility, fully 82 percent of children at participating schools in Illinois, Kentucky, and Michigan were approved for free or reduced-price meals.²¹ (See Figure 4.) Some schools had higher percentages and some lower, but children attending these schools live amidst an extraordinary concentration of poverty. Community eligibility is a powerful response that can help alleviate food insecurity and other hardships that poverty brings.

As explained above, any school with an Identified Student Percentage of 40 percent or more may participate in community eligibility, though schools with higher Identified Student Percentages receive larger federal reimbursements. Schools that participate in community eligibility tend to exceed the 40 percent threshold by a wide margin.²² Nonetheless, some schools with Identified Student Percentages between 40 percent and 50 percent successfully implemented community eligibility.



Section 4: The Impact on School Meal Participation

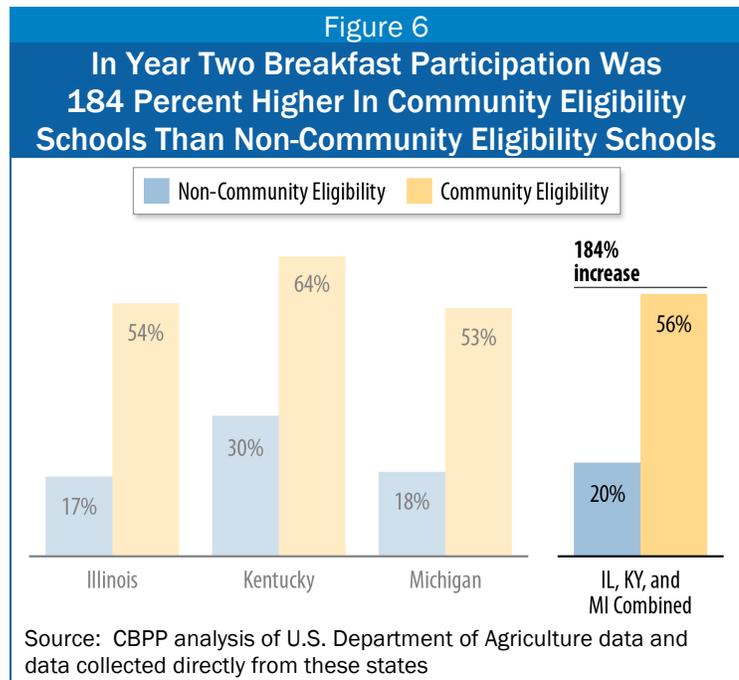
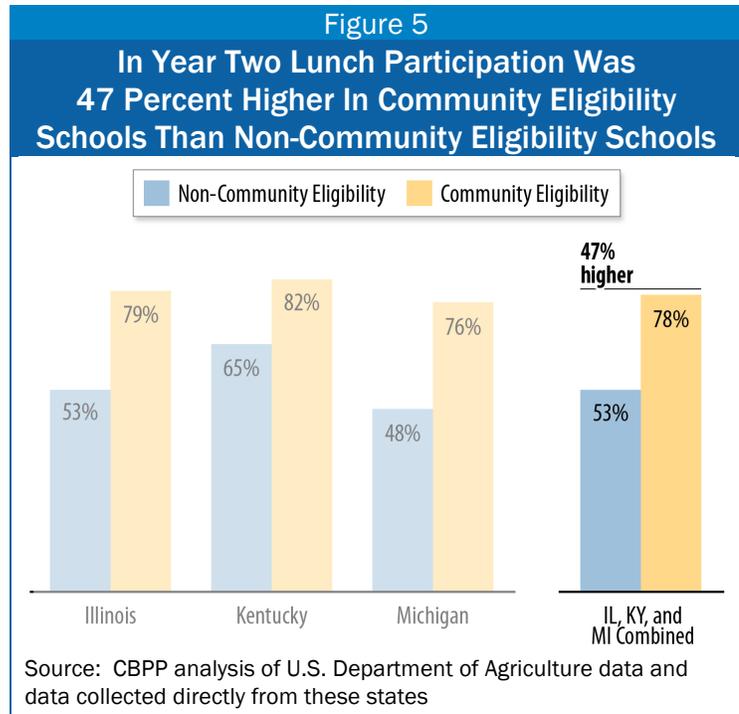
Schools that adopt community eligibility experience a striking increase in participation in the school meal programs. This section compares meal participation in community eligibility schools in Illinois, Kentucky, and Michigan both to other schools in these states and to participation prior to implementation.²³

Participation Is Higher in Community Eligibility Schools than Other Schools

School meal participation in October 2012 was substantially higher in community eligibility schools than in other schools across Illinois, Kentucky, and Michigan.²⁴ Lunch participation was 78 percent in community eligibility schools, compared to 53 percent participation in other schools. (See Figure 5.) The contrast was even more striking for breakfast, where participation was nearly three times higher in community eligibility schools — 56 percent versus 20 percent in other schools. (See Figure 6.)

As might be expected, schools that implemented community eligibility had higher participation rates than other schools even before they implemented the option, but community eligibility expanded the difference. In October 2010, lunch participation was 21 percent higher in schools that opted for community eligibility the following year than in other schools; by October 2012, the difference had grown to 47 percent.²⁵

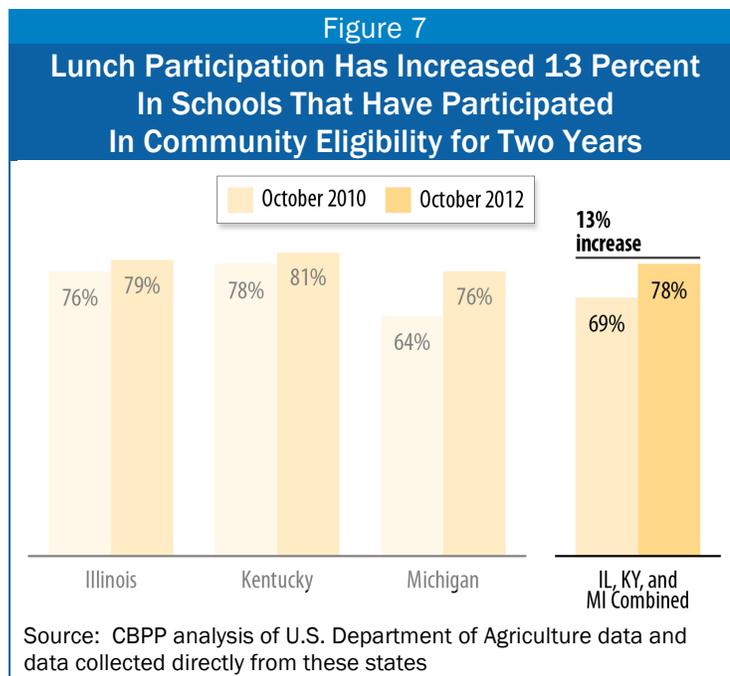
Similarly, in October 2010, breakfast participation was more than two times higher in schools that opted for community eligibility the following year than in other schools, but rose to nearly three times higher in October 2012.²⁶



Participation Increases When Schools Adopt Community Eligibility

School meal participation has risen substantially in schools that have adopted community eligibility. In schools that have been participating in community eligibility for two years, average daily lunch participation rose 13 percent — from 69 percent in October 2010 to 78 percent in October 2012 — resulting in more than 23,000 additional children eating lunch daily.²⁷ (See Figure 7 and Box 4.)

Average daily breakfast participation rose 25 percent (from 44 percent to 56 percent) over the same period, resulting in more than 29,000 additional children eating breakfast daily. (See Figure 8.)



The increase in lunch participation is particularly impressive given that implementation of community eligibility coincided with another important improvement in the federal school meal programs that may have temporarily depressed lunch participation.

A cornerstone of the Healthy, Hunger-Free Kids Act of 2010 (the same legislation that established community eligibility) is a requirement that schools update their school meal patterns for the first time in almost 20 years. Based on recommendations from the Institute of Medicine, USDA designed new meal requirements that increase the availability of fruits, vegetables, whole grains, and low-fat milk while reducing sodium and fat. The goal of the new — and significantly more rigorous — standards is to provide nutrient-dense foods that children like to eat.

The new standards took effect for lunch for the 2012-2013 school year. (Breakfast standards are being implemented in the 2013-2014 school year.) In some schools, they brought substantial menu changes. It takes children time to adjust to healthier offerings, and it takes schools time to try new ingredients and recipes to learn which healthy options children enjoy most.

Box 4. Community Eligibility Improved School Lunch Participation By 30 Percent in Detroit Public Schools

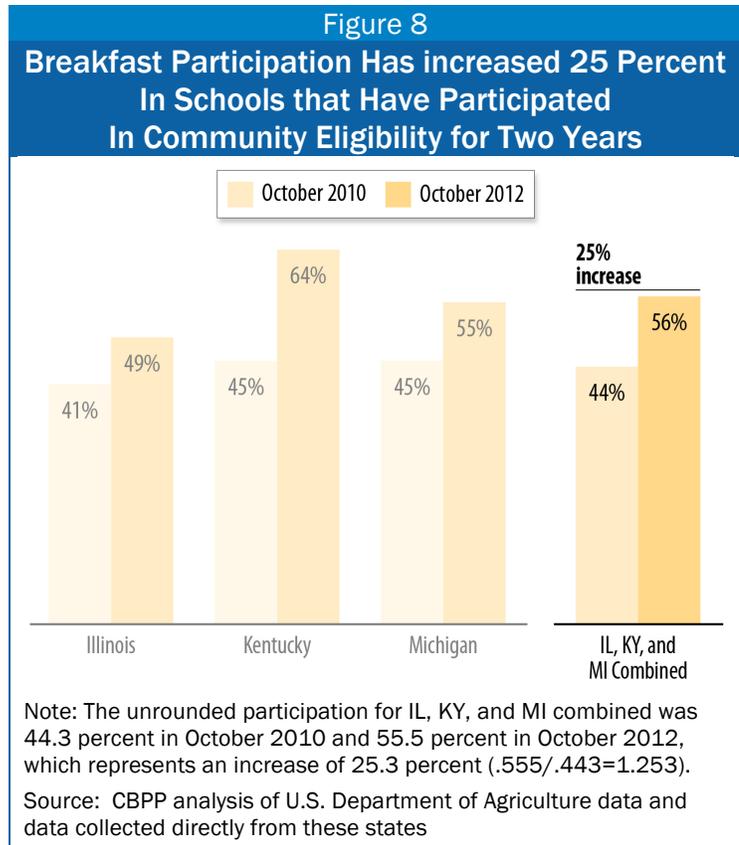
Detroit Public Schools implemented community eligibility in the 2011-2012 school year, and the results show how the option can increase participation in both breakfast and lunch. Between October 2010 and October 2012, the number of students eating lunch rose by nearly 14,000 or 30 percent (from 55 percent to 71 percent). Breakfast participation rose by 7,400 students or 15 percent (from 49 percent, which is already unusually high for breakfast, to 56 percent). The district had implemented a district-wide “breakfast in the classroom” program in the 2009-2010 school year, so a high percentage of students already were participating in breakfast when community eligibility was introduced.

As expected, national participation in the school lunch program declined during the 2012-2013 school year, primarily among students who do not qualify for free or reduced-price meals. In October 2012, 61 percent of students nationwide typically ate a school lunch, compared to 63 percent in recent years.²⁸ Likewise, for the schools that adopted community eligibility starting in 2011-2012, lunch participation declined modestly in 2012-2013 in Illinois and Kentucky (from 80 percent to 79 percent in Illinois and from 84 percent to 81 percent in Kentucky), which is likely the result of students adjusting to the new menus. (See Appendix B.)

School Breakfast Participation Receives Needed Boost from Community Eligibility

Participation in the School Breakfast Program trails behind lunch participation. The traditional method of offering breakfast before school, in the cafeteria, with a means test based on required paper applications, fails to reach many of the most vulnerable children. A number of obstacles – from bus schedules that get children to school too late, to the effects of social stigma associated with eating school breakfast when it is seen as a “program for poor kids” – have limited the accessibility and reach of the School Breakfast Program. The implementation of community eligibility goes a long way to address the shortfall in school breakfast participation. Offering breakfast for free to all students, as well as eliminating the need to track each child’s participation, makes it easier for schools to implement strategies that are proven to increase participation, such as breakfast in the classroom, and “grab and go” kiosks in school hallways. (See Boxes 5 and 6.)

Breakfast participation in Illinois and Michigan rose each year in schools that offered community eligibility two years in a row (from 47 percent to 49 percent in Illinois between October 2010 and October 2012, and from 52 percent to 55 percent in Michigan). Kentucky experienced a modest decrease in the second year, but nonetheless saw a substantial increase over the two-year period, from 45 percent in October 2010 to 64 percent in October 2012, reflecting large-scale implementation of breakfast in the classroom. (See Appendix B.)



Box 5. Expanding Breakfast Participation Through Breakfast in the Classroom

“Breakfast in the classroom,” where all children are offered a free meal to eat in their classroom as they begin their school day, strikingly increases participation by making breakfast convenient and accessible. 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. There is no requirement that schools implementing these alternative models offer breakfast to all students free, but community eligibility’s requirement that breakfasts (and lunches) be offered to all students free, and its elimination of the requirement to track individual student breakfast participation, helps schools build stronger breakfast in the classroom programs.

By increasing school breakfast participation, breakfast in the classroom improves student achievement, diets, and behavior. Schools that offer breakfast in the classroom report decreases in discipline referrals and behavior problems, visits to school nurses, and tardiness. They also report increases in student attentiveness and attendance, as well as generally improved learning environments. Children who eat breakfast closer to test-taking time perform better on standardized tests than those who skip breakfast or eat breakfast at home.

For more information see:

- *Breakfast for Learning: Scientific Research on the Link Between Children’s Nutrition and Academic Performance*, Food Research and Action Center, Fall 2011, <http://frac.org/wp-content/uploads/2009/09/breakfastforlearning.pdf>
- Food Research and Action Center’s resources on expanding breakfast in the classroom at <http://frac.org/federal-foodnutrition-programs/school-breakfast-program/breakfast-in-the-classroom/>

For example, Floyd County, Kentucky took the opportunity to adopt breakfast in the classroom when it implemented community eligibility, offering all students a free meal in the first ten minutes of class time. The county chose breakfast in the classroom because community eligibility made it possible to offer that model district-wide, and it would help increase participation. As a result, breakfast participation doubled, with many students participating for the first time. The district achieved its highest attendance rate ever (95 percent), which staff attribute at least in part to the breakfast program. After successfully implementing both community eligibility and breakfast in the classroom, the district’s financial picture is more promising and the district has been able to purchase new equipment to enhance food service, staff safety, and nutrition quality.

Box 6. Implementation Case Study: West Virginia

West Virginia implemented community eligibility under the leadership of the State Superintendent of Education, who prioritized child nutrition promotion as an important tool to improve both academic achievement and children's health. Department of Education staff and the Child Nutrition Director worked closely together to promote smooth implementation and widespread participation.

Out of 352 eligible schools, 282 adopted the option, with 35 out of the 54 eligible districts participating; 12 districts implemented community eligibility district-wide. More than 100,000 students — more than one in three students statewide — now attend community eligibility schools. According to the state's Child Nutrition Director, the challenges were minor compared to the significant benefits of community eligibility — higher school meal participation, reduced paperwork, improved administration, and elimination of identification of low-income students that can lead to stigma.

A key element of West Virginia's success is its strong centralized system of direct certification of children living in households receiving SNAP benefits or TANF cash assistance. All matching is conducted at the state level and automatically entered into districts' certification databases. Centralized electronic records allow for a seamless process through which the state also can obtain school district data directly, including school-level data. The state's system features an interface between the child nutrition and general statewide student databases, which includes a family identifier to directly certify for free meals all children in households receiving SNAP benefits.

To improve student meal access, participation, and service, the state requires all community eligibility schools to implement at least one innovative breakfast strategy — breakfast after the bell, breakfast in the classroom, or "grab and go" breakfast. To child nutrition staff, providing breakfast after the start of the school day makes much more sense than trying to squeeze it in during the hectic time when students get off buses and try to get to class. West Virginia's breakfast participation rose by 10 percent (from 47 percent to 52 percent daily) in schools that introduced community eligibility and the associated changes in meal delivery.

Section 5: Eliminating School Meal Applications

Schools implementing community eligibility no longer collect school meal paper applications to identify the students — often a small group of predominantly low-income students — who do not qualify for free or reduced-price school meals. This simplification eliminates the numerous hours that school staff spent processing school meal applications, conducting verification, and tracking the children who eat school meals based upon their eligibility or ineligibility for free or reduced-price meals. Instead, staff can focus on educating and feeding children, and vulnerable children can count on getting two healthy meals during the school day.

Most school districts and state education agencies 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. When school districts implement community eligibility in one or multiple schools and no longer collect school meal applications, they no longer have income data for the students attending community eligibility schools.

Alternative data sources are readily available to fill these needs, such as the school's free meal claiming percentage. (See Box 7.) Moreover, the U.S. Departments of Education and Agriculture no longer require data from school meal applications — or any individual income data — for any of their programs. As a result, most states (the District of Columbia, Illinois, New York, Ohio, and West Virginia) already implementing community eligibility have been able to implement it without requiring school districts to collect individual student income information, allowing schools and families the full benefit of eliminating individual applications.²⁹ In these states, it is up to the school district to determine if it will collect student income data using forms unrelated to the school meals programs.

The positive experience of states and school districts that have implemented community eligibility demonstrates that the traditional use of school meal application data for allocating funds should not dissuade states and localities from making it easier for low-income children in high-poverty schools to get nutritious meals at school. Kentucky and Michigan, the only two states offering community eligibility for the 2012-2013 school year that require the collection of individual income data for state education funding, issued new income information forms that were collected from families without a negative impact on school funding. During the 2012-2013 school year, those two states had 281 additional schools implement community eligibility even with the requirement that they continue to collect income information forms from students, an increase of 56 percent from the previous school year.

Box 7: Alternative Data Sources to Assess a School's Poverty Level

- **The school's free claiming percentage under community eligibility:** This percentage, grounded in data from other need-based programs, serves as a proxy for the share of students who would be certified for free or reduced-price meals if applications were still taken. Although not an exact match, a school's claiming percentage under community eligibility is a good proxy for the school's poverty level.
- **For clustered schools, their individual free claiming percentage:** When schools are clustered for purposes of community eligibility, the claiming percentage is calculated across the entire group, so it does not reveal differences in poverty levels among them. Using the individual school's claiming percentage it would use if it were participating individually in community eligibility may allow for a better assessment of the school's poverty level.
- **The school's Identified Student Percentage:** For some purposes, using the Identified Student Percentage may make more sense than the claiming percentage under community eligibility. For example, the claiming percentage is capped at 100 percent free meals. In districts with many high-poverty schools, multiple schools could have a claiming percentage of 100 percent. The Identified Student Percentage can be used to distinguish their relative poverty levels
- **Medicaid data:** Nearly all children with incomes below 133 percent of the poverty line are eligible for Medicaid; implementation of the Affordable Care Act will increase the likelihood that they are enrolled. Medicaid data is already a permissible alternative to school meal applications for allocating Title I funds. Moreover, some states and school districts have already developed the capacity to match student databases with Medicaid databases for USDA's Medicaid Direct Certification Demonstration or for direct verification of school meal applications. When Medicaid receipt for a school's students can be determined, it is a reliable indicator of poverty
- **Census data:** Census data are already a permissible alternative to school meal applications for allocating Title I funds within a school district. In addition, USDA commissioned the National Committee on Statistics to examine how Census data could be used as an alternative to applications for the school meal program. In areas where children primarily attend their neighborhood school, Census data for the relevant school attendance area is a reliable source of poverty data.

Section 6: Addressing the Need for Student Income Data While Implementing Community Eligibility

This section draws upon the experience of the states that have implemented community eligibility thus far to describe how community eligibility schools can participate in federal, state, and local programs without data from school meal applications.

Targeting Resources Without Individual Income Data

USDA and the U.S. Department of Education do not require schools to collect individual income data for any of their programs. For allocating state or local funds to districts or schools, alternative data can be used in lieu of the income data collected on school meal applications. Districts can identify individual low-income students for purposes such as fee waivers or educational assessment either by considering *all* students attending community eligibility schools to be low-income or by focusing on Identified Students.

Federal Programs

Several important federal programs have routinely used income data from school meal applications — Title I education funding, E-Rate funding (which helps schools obtain telecommunications and Internet access at affordable rates), and USDA child nutrition programs. But, recognizing the importance of allowing high-poverty schools to serve all meals at no charge, the federal agencies that run these programs have developed policies that allow community eligibility schools to use alternative data sources.

Title I Funding

Under the Elementary and Secondary Education Act, the federal government provides funding — commonly known as Title I funding — to support the education of disadvantaged students. The Department of Education allocates Title I funds to school districts primarily based on information available through Census data and community eligibility does not affect the amount of Title I funds that a school district receives.

Allocations of Title I funds within school districts, however, must be based on the percentage of economically disadvantaged students in each school. Districts have typically used the share of students approved for free (or free and reduced-price) school meals to identify economically disadvantaged students. This approach, however, is not the only method of identifying economically disadvantaged students.

The Department of Education has explained how community eligibility schools can identify economically disadvantaged students in the absence of school meal applications.³⁰ For Title I purposes, schools are permitted to use their Identified Student Percentage multiplied by 1.6 (capped at 100 percent) as the percentage of economically disadvantaged students.³¹ In addition, the Department of Education has directed states implementing community eligibility that schools participating as a group must use their individual school Identified Student Percentage — multiplied by 1.6 (capped at 100 percent) — for Title I purposes, even when it differs from the group's Identified Student Percentage.

Alternatively, school districts with community eligibility schools can use the data sources unrelated to school meals that were previously available to them to determine the percentage of economically

disadvantaged students — Census data, TANF assistance data, or Medicaid data. School districts may also use a composite of those measures (which could include the Identified Student Percentage measure).³²

Title I Assessment

Schools must track the academic progress of all students and students in certain subgroups, including those who are economically disadvantaged. The Department of Education has offered two approaches to identifying the economically disadvantaged subgroup in community eligibility schools.

- A school may consider *all* students in a community eligibility school to be economically disadvantaged for tracking educational achievement.³³ This approach ensures that an individual student does not lose priority for public school choice or eligibility for supplemental educational services under the Elementary and Secondary Education Act (ESEA), which are based in part on a student being economically disadvantaged.
- In the 42 states that have been granted “ESEA flexibility,”³⁴ community eligibility schools can consider only the subgroup of Identified Students to be economically disadvantaged.³⁵ ESEA flexibility waives the law’s requirements regarding priority for public school choice and eligibility for supplemental educational services, so children in community eligibility schools won’t lose out if their state takes this approach.

E-Rate

The Schools and Libraries Program, commonly known as “E-rate,” helps schools obtain telecommunications and Internet access at affordable rates. Schools receive discounts based on the share of students certified for free or reduced-price school meals. Schools with 75 percent or more of their students certified for free or reduced-price meals receive a 90 percent discount; schools with 50 to 74 percent of their students certified for free or reduced-price meals receive an 80 percent discount.

The Federal Communications Commission, which sets policy for the E-rate program, has determined that community eligibility schools may continue to use the free and reduced-price certification data that they relied on for the most recent year in which the schools did not participate in community eligibility to determine discounts on services received under E-rate.³⁶

Child Nutrition Programs

The federal Child and Adult Care Food Program, the Summer Food Service Program, and the Seamless Summer Option rely on data from school meal applications to determine which sites qualify to provide meals at no charge to all children. Known as “area eligibility,” this option allows any site in a school area where at least 50 percent of the children are certified for free and reduced-price meals to provide all meals and snacks to children at no charge. In recognition of the fact that more than 50 percent of students at community eligibility schools are low-income, USDA guidance indicates that all community eligibility schools meet the area eligibility requirement for these child nutrition programs.

The Fresh Fruit and Vegetable Program requires states to use schools’ free and reduced-price certification percentages when allocating funds. For community eligibility schools, USDA has directed states to use the individual school’s Identified Student Percentage multiplied by 1.6 (even if

the school is participating in community eligibility as part of a group) for purposes of allocating Fresh Fruit and Vegetable Program Funds.³⁷

State and Local Programs

Some states use school meal eligibility data to allocate state or local education or other funds.³⁸ In instances where the data are used to assess a school or school district's poverty level, the state can substitute each school's Identified Student Percentage multiplied by 1.6 – the approach that the Department of Education uses for Title I funding – or another alternative data source such as Medicaid or Census data.

Establishing a work group of staff from the school nutrition program and other relevant offices within the state education department, like the Ohio group described in Box 8, can help identify and address any issues that may arise when school districts implement community eligibility and stop collecting school meal applications. States also can provide guidance and resources to school districts to help them navigate any effects of eliminating school meal applications. For example, Kentucky provided a memorandum to school district superintendents on data issues related to the state programs that might be affected by community eligibility.³⁹ West Virginia provided training specifically on how Title I would work in community eligibility schools.⁴⁰

Box 8. Best Practice Example: Ohio Department of Education Working Group

Shortly after USDA selected Ohio to implement community eligibility, the state department of education convened an internal working group to bring together staff from programs that could be affected by community eligibility. The working group includes school nutrition, Title I, accountability, school funding, and assessment staff. The group meets regularly and is considering how to adapt state funding formulas to incorporate community eligibility. Now that the working group is in place, it also serves as a venue to address other cross-program issues. By convening a similar working group now, in preparation for implementing community eligibility for the 2014-2015 school year, states can address in advance any implications of community eligibility for other programs.

For purposes of tracking educational progress or providing fee waivers to individual students, states or school districts can identify individual low-income students either by considering *all* students attending community eligibility schools to be low-income or by focusing on Identified Students. In most states that have implemented community eligibility, school districts decide whether to collect individual income data, and the state provides a model family income collection form. The next section describes key considerations for states and school districts that decide to collect individual income data.

Collecting Individual Income Data Outside the School Meal Program

States or school districts that do not wish to operate without individual student income data, or that do not wish to delay implementation of community eligibility until they adopt alternative methods for directing resources to economically disadvantaged students, can collect those data outside the school meal program. Community eligibility schools, however, may not collect school meal applications or use funds from the school nutrition account to collect individual income data.⁴¹ Income data collected outside the school meal program may be used in aggregate to target state or local funding, and individual data may be used to provide fee waivers or other services to individual students. Some states and districts have successfully implemented alternative data collection

processes that allow them to participate in community eligibility. Areas interested in implementing alternative income data collection processes will need to make several key decisions.

- **Who handles the alternative income collection forms.** In many community eligibility schools that collect alternative income forms, staff not associated with the school meal programs collect the forms. By contrast, in Detroit, Michigan, school nutrition staff, who are familiar with the process, collect the forms but the cost of the data collection is covered by the school district rather than the school nutrition program.
- **Whether forms are distributed to all parents.** Some school districts distribute alternative income forms only for children who have not been directly certified. For example, Detroit, Michigan, Buffalo, New York, and Rochester, New York, use this approach. As a result, they seek to collect alternative income forms only from about one-third of their families.
- **Whether the form can be simplified.** The federal rules about what must be included on a school meal application do not apply to these alternative data forms. Creating the new form gives school districts the opportunity to develop a clearer form that families feel more comfortable completing. For example, some families are reluctant to share information about a Social Security number and the new form does not need to ask for that.
- **Whether the forms are mandatory or optional for parents.** While parents cannot be required to submit school meal applications, states or school districts can make their own determination about whether to require alternative income forms as a condition of enrollment. If submitting an income form is required, it is important to provide a way for parents with language or literacy barriers, as well as those with no income, to complete the form. Even when parents are not required to submit the form, school districts have been able to collect forms successfully from the vast majority of parents. In Floyd County, Kentucky, for example, 98 percent of the forms were returned the first year they were used. Detroit, Michigan adapted strategies originally devised to increase submissions of school meal applications to increase submissions of the alternative forms. In Rochester, New York, the district engaged principals and explained to parents how the data would help their child's school.

Section 7: Action Steps

Community eligibility is an important tool to address child hunger and to improve schools. It will be available nationwide at the beginning of the 2014-2015 school year. By preparing now, advocates, school districts, and state agency staff can work together to ensure a smooth and successful implementation of community eligibility. This section provides key action steps and resources.

Steps for Advocates

1. Encourage eligible school districts to adopt community eligibility.

Since this is a new option, local school officials may not have heard of community eligibility and will have some questions or concerns. They will want to know whether their schools are eligible for community eligibility; they will be able to find a list of eligible schools on USDA's website or their state agency's website by next spring. (See Box 1.) They may have questions about how they would be reimbursed for meals and how it would affect the operations of the school nutrition program and other programs that rely on data from school meal applications. Advocates can help school officials understand community eligibility by sending a letter to the school district or by giving presentations on community eligibility to school officials.

[FRAC's Sample Letter to A School District on Community Eligibility](#)⁴²
[FRAC/CBPP Introductory Presentation](#)⁴³

2. Explain community eligibility to families and the general school community.

It is important to communicate any changes in the application process to parents, especially in districts that decide to implement community eligibility in some, but not all, schools. Parents will need to understand which schools still require an application and why some of their children might receive free meals while others do not. School districts in the first three states implementing community eligibility received overwhelmingly positive feedback from families, despite some initial concerns that parents might object to some children getting free meals while others do not.

[FRAC's Fact Sheet Community Eligibility](#)⁴⁴
[FRAC's Overview of Community Eligibility](#)⁴⁵
[FRAC's Brief on Community Eligibility](#)⁴⁶

3. Work with the media to promote community eligibility.

It is important to build excitement around this powerful new option and help spread the word about it. Advocates can publish letters to the editor and opinion editorials in local papers, conduct outreach to press outlets to pitch stories to local reporters, and speak about the importance of adopting community eligibility at local forums and coalition meetings. Social media also can be utilized to help spread the word and the excitement.

[Sample Opinion Editorial](#)⁴⁷

4. Work with the state agency and education advocates to adapt to the elimination of school meal applications.

Advocates can help set up an advisory group for the state that includes representatives from the state child nutrition agency, the state department of education, Title I funding, E-rate, accountability and assessment offices, and other key stakeholders that might be affected by the elimination of free and reduced-price school meal application data. (See Box 8 for a description of Ohio's successful working group.)

Steps for School Districts

1. **Calculate the financial impact.** School districts considering adopting community eligibility will want to calculate its impact on their revenue, taking into account federal meal reimbursements, participation increases, forgone fees, and administrative savings. 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](#)⁴⁸

2. **Increase the number of Identified Students.** Schools and districts can improve their chances of qualifying for community eligibility or increase their free claiming percentage under community eligibility by adopting effective strategies to find all Identified Students in the district. Such mechanisms are described in Box 2 and include frequent data matches between student enrollment lists and SNAP and TANF data, extended categorical eligibility, 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 enrolled 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 that are counted as Identified Students.

[CBPP's Key Steps to Improve Access to Free and Reduced-Price School Meals](#)⁴⁹

[FRAC's SNAP/Food Stamps Outreach and Access Toolkit](#)⁵⁰

3. **Determine if district-wide implementation is possible or which schools or groups of schools will participate.** School districts will have to decide whether they can implement 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.⁵¹ 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. Box 3 offers an example of how to use the Identified Student Percentage for grouping.
4. **Adjust administrative processes.** School districts implementing community eligibility will need to inform parents and staff and adjust their administrative processes. In particular, the district's claiming process must be revised so that claims for meals served in community eligibility schools are based on their claiming percentage (Identified Student Percentage x 1.6) and meal counts. 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.

[Ohio's Sample Letter to Households](#)⁵²

[Illinois' Model Meal Count Edit Form](#)⁵³

Steps for States

1. **Promote community eligibility and provide multiple opportunities for school districts to learn about it.** By developing a plan to promote community eligibility and working with advocates and other stakeholders, states can publicize the new option. Effective promotion activities start in the fall and include issuing a press release and posting materials on websites, such as fact sheets, calculators, and sample forms adapted from the excellent materials that participating states have developed. Illinois and Kentucky both have webpages devoted to community eligibility which house a wide assortment of informative materials for school districts. Webinars also are useful ways to provide training that can be recorded and posted on the web for future viewing.⁵⁴ (The presentation slides for USDA’s introductory webinar or one offered by another state can serve as a model.)

[West Virginia’s Press Release](#)⁵⁵

[Boston Globe Article about Community Eligibility](#)⁵⁶

[Television Coverage of Atlanta’s Community Eligibility Implementation](#)⁵⁷

[Illinois’ Community Eligibility Website](#)⁵⁸

[USDA’s Introductory Webinar Slides for 2012-2013 School Year](#)⁵⁹

2. **Improve direct certification systems and help school districts strengthen their methods to certify all Identified Students.** State agencies can run additional data matches of student enrollment lists with SNAP, TANF, and FDPIR data and provide guidance to school districts to help them certify all Identified Students using the methods described in Box 2. This assistance can help school districts accurately determine which schools are eligible and increase their free claiming percentage under community eligibility. New York, for example, provides useful guidance to school districts on steps they may take to certify Identified Students; other states may wish to provide similar guidance.

[New York Guidance](#)⁶⁰

3. **Set up a work group of staff from the 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. Ideally, this group will be led by a high-level administrator within the education department who can bring staff together from multiple areas, including school nutrition, Title I, assessment, school funding, accountability, and E-rate. This group can work through the implications of not collecting school meal applications for programs that currently rely on the data. Smaller sub-groups can meet on various issues as needed, with the whole group meeting monthly or even quarterly. States may have an existing work group that they can utilize for this purpose or find that once it is set up, it can address other challenges facing the education department. (See Box 8 for a description of Ohio’s successful working group.) States can also provide guidance, contact information, and resources to help school districts navigate any ripple effects of community eligibility. For example, Kentucky provided specific guidance for school district superintendents on data collection related to the state programs that might be affected by community eligibility. Ohio and West Virginia provided training specifically on how Title I would work in community eligibility schools.

[U.S. Department of Education Letters on Title I and Community Eligibility](#)⁶¹

[Federal Communications Commission Guidance on E-Rate and Community Eligibility](#)⁶²

[Kentucky Guidance on Data Collection under Community Eligibility](#)⁶³

[Ohio Guidance on Community Eligibility and Title I](#)⁶⁴

[West Virginia Presentation on Community Eligibility and Title I](#)⁶⁵

3. **Prepare to publish lists of eligible schools.** 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 of schools eligible for community eligibility (and those near-eligible) by May 1, 2014, as required (See Box 1). If school districts are not already reporting school-level data, they will need guidance on how to submit lists of eligible and near-eligible schools or the Identified Student Percentage for each school.

[Michigan's eligible districts and schools](#)⁶⁶

5. **Establish a simple process for electing and operating community eligibility.** 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. Moreover, states may wish to provide guidance on claiming and reporting for community eligibility schools.

[Ohio School District Application for Community Eligibility](#)⁶⁷

Conclusion

Community eligibility has been successfully implemented by thousands of high-poverty schools in the first states selected to offer it. Those states, districts, and schools have recognized the opportunity to create hunger-free schools in low-income communities. The first two years of implementation show that schools that implement community eligibility provide healthy meals to more children, with especially strong impacts on breakfast participation. This is a significant accomplishment as schools across the country are working to expand access to their breakfast programs — an underutilized resource — and are looking for mechanisms to implement successful service models that work best when all students eat at no charge. Community eligibility gives schools a cost-effective way to serve all breakfasts and lunches at no charge by allowing for economies of scale and simplifying program administration. Moreover, by reducing paperwork and streamlining program operations, it frees up resources that high-poverty schools can invest in improving meal quality.

It is no surprise that the community eligibility initiative continues to grow in the states that have implemented it, and that every school district interviewed after participating in community eligibility for a year said that they would recommend the option to similar low-income schools. As states prepare for nationwide implementation, they can build on the successful practices and useful materials described in this report, which were developed by the states that have already implemented community eligibility. By taking important steps now, states will be able to bring more high-poverty schools into community eligibility and school districts will be able to develop strong programs that deliver to many more low-income children the healthy breakfasts and lunches they need to succeed in school every day.

Appendix A

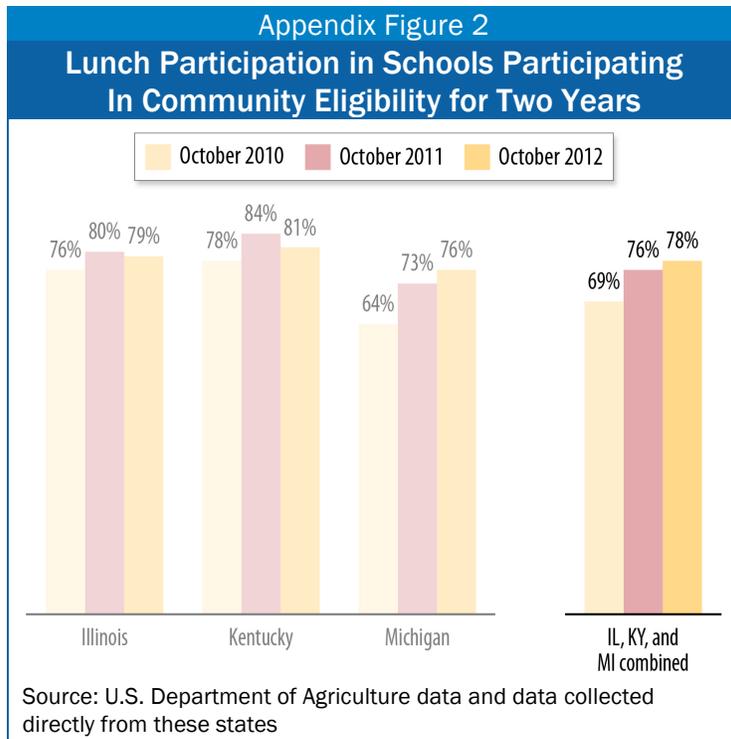
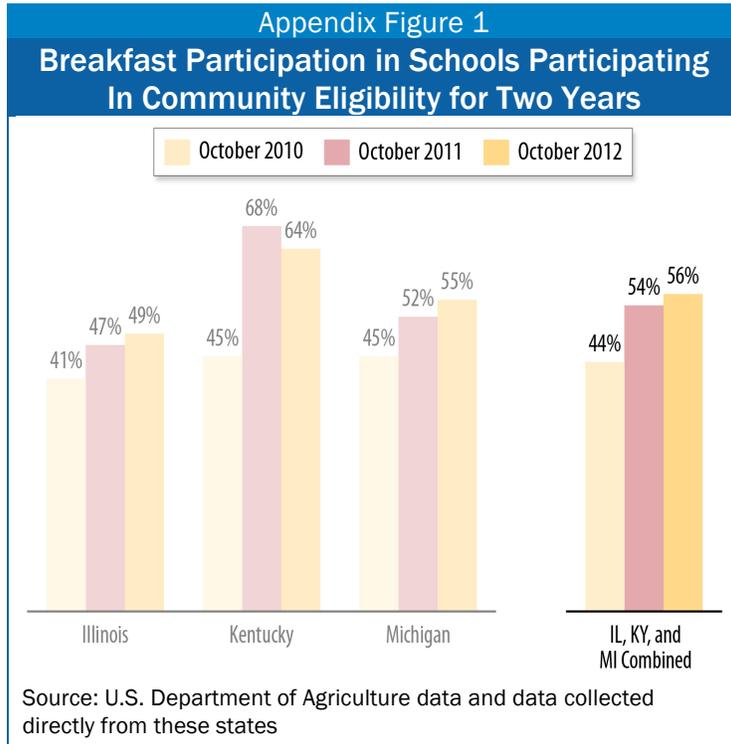
Table 1		
Federal School Meal Reimbursement Rates for 2012-2013 School Year*		
Meal Category	Household Income	Rate**
Free Lunch	At or below 130 percent of federal poverty level***	\$2.86
Reduced-Price Lunch	131-185 percent of federal poverty level	\$2.46
Paid Lunch	Above 185 percent of federal poverty level	\$0.27
Free Breakfast	At or below 130 percent of federal poverty level	\$1.55
Reduced-Price Breakfast	131-185 percent of federal poverty level	\$1.25
Paid Breakfast	Above 185 percent of federal poverty level	\$0.27

* These rates apply in the 48 contiguous states. For the higher rates for Alaska and Hawaii, see <http://www.fns.usda.gov/cnd/Governance/notices/naps/NAPs12-13Chart.pdf>.

**Schools that serve more than 60 percent of their lunches to children who qualify for free or reduced-price meals receive an extra 2 cents per lunch. Also, school districts that have been certified as meeting the federal nutrition requirements that took effect for the 2012-2013 school year receive an additional 6 cents for each lunch. Each lunch also received 22.25 cents worth of commodities from the federal government. Schools in "severe need," meaning that they served 40 percent or more of their lunches free or at a reduced price in the year before last, receive an additional 30 cents for each free or reduced-price breakfast in the 2012-2013 school year. Almost all schools adopting community eligibility already qualified for the additional 2 cents for lunch and 30 cents for breakfast; any that hadn't would qualify for it after implementation.

***For the 2012-2013 school year, 130 percent of the federal poverty level was \$29,965 for a family of four; 185 percent of the federal poverty level was \$42,643 for a family of four.

Appendix B



End Notes

¹ See 42 U.S.C. 1759a(a)(1)(F). U.S. Department of Agriculture (USDA) policies regarding community eligibility have been established in memoranda, the most recent of which summarizes current policies. See Food and Nutrition Service Memorandum, *Community Eligibility Option: Guidance and Procedures for Selection of States for School Year 2013-2014*, USDA, December 7, 2012, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013os.pdf>. USDA intends to issue an interim final rule establishing policies for the 2014-2015 school year, when community eligibility will be available nationwide.

² See J.M Murphy, “Breakfast and Learning: An Updated Review,” *Journal of Current Nutrition and Food Science*, 2007; 3(1): 3-36.

³ This paper uses the term “state” to refer to the District of Columbia.

⁴ This paper uses the term “school district” to refer to local education agencies, which include public, charter, and private school entities, or “school food authorities,” which include all local entities that participate in the federal school meal programs.

⁵ Community eligibility builds on an option, known as Provision 2, which, since 1980, has allowed high-poverty schools to serve all meals at no charge. Over 1 million low-income children attend Provision 2 schools. See Food and Nutrition Service, *Direct Certification in the National School Lunch Program: State Implementation Progress School Year 2011-2012*, USDA, October 2012, Table 2, <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/DirectCert2012.pdf>. These schools are reimbursed based on school meal applications, but they collect and process applications only once every four years at most and are reimbursed in the intervening years based on the information in those applications. Some Provision 2 schools have found, however, that after the long break between applications some eligible families do not complete applications, so schools’ reimbursements do not fully reflect their students’ poverty. Community eligibility builds on Provision 2 by eliminating applications altogether. Provision 2 schools can transition to community eligibility so long as they can calculate their Identified Student Percentage for the prior year.

⁶ Identified Students are the same students reported in Box 4-1 of the former version of the FNS-742 School Food Authority Verification Summary Report or Section 3 of the new version of the form, which will be used for school year 2013-2014 and later years and is available at <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP38-2013a.pdf>.

⁷ Additional information regarding outreach to households that are eligible for SNAP benefits but not enrolled is available on USDA’s SNAP outreach web page at <http://www.fns.usda.gov/snap/outreach/>. See also *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.

⁸ The 1.6 multiplier was selected based on an analysis conducted by the Center on Budget and Policy Priorities on the typical ratio between Identified Students and all students certified for free or reduced-price meals in schools and school districts. There are no reduced-price reimbursements under community eligibility.

⁹ USDA’s calculator is available at <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013a2.xls>. Community eligibility schools will not receive federal reimbursement beyond the amounts obtained by applying their free and paid claiming percentages to meals served. They may rely on any non-federal funds in the school nutrition account to cover any shortfall.

¹⁰ A grace year is available to schools that lose eligibility for community eligibility at the end of a four-year cycle by a small margin. The grace year gives schools an opportunity to improve their direct certification processes and increase their Identified Student Percentage so that they once again qualify for community eligibility.

¹¹ School districts that have been participating in community eligibility and wish to return to the standard application process may do so for the next school year if they notify their state agency by June 30.

¹² See 42 U.S.C. 1760(p), 7 C.F.R. § 210.14(e) and (f), Food and Nutrition Service Memorandum, *Paid Lunch Equity: School Year (SY) 2013-2014 Calculations*, USDA, January 2, 2013, <http://www.fns.usda.gov/cnd/governance/Policy->

[Memos/2013/SP19-2013os.pdf](#), and Food and Nutrition Service Memorandum, *Paid Lunch Equity: Guidance for SY 2013-14*, USDA, April 17, 2013, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP34-2013os.pdf>.

¹³ For example, in August 2013, Baltimore City Public Schools announced that the price of a school lunch would increase from \$2.35 for elementary school students and \$2.65 for high school students to \$3.00. See Erica L. Green, “City School Lunch Prices to Increase,” *The Baltimore Sun*, August 22, 2013, http://www.baltimoresun.com/news/maryland/education/blog/bs-md-ci-school-lunch-prices-20130821_0,7407628,full.story.

¹⁴ *Community Eligibility Helps Low-Income Students and Schools*, Food Research and Action Center, June 2013, p. 3, http://frac.org/pdf/community_eligibility_helps_low_income_students_schools.pdf.

¹⁵ *Breakfast for Health*, Food Research and Action Center, Fall 2011, <http://frac.org/wp-content/uploads/2011/08/breakfastforhealth.pdf>.

¹⁶ See Dr. Janey Thornton, *Back to Healthy School Meals: USDA Congratulates Six States for Nearly 100% of Schools Meeting New Meal Standards*, Food and Nutrition Service, August 16, 2013, <http://blogs.usda.gov/2013/08/16/back-to-healthy-school-meals-usda-congratulates-six-states-for-nearly-100-of-schools-meeting-new-meal-standards/#more-47134>. More information on school meal nutrition standards is available at <http://frac.org/federal-foodnutrition-programs/national-school-lunch-program/school-meal-nutrition-standards/>.

¹⁷ *Breakfast for Learning: Scientific Research on the Link Between Children’s Nutrition and Academic Performance*, Food Research and Action Center, Fall 2011, <http://frac.org/wp-content/uploads/2009/09/breakfastforlearning.pdf>.

¹⁸ The findings presented in this report are based on a Center on Budget and Policy Priorities analysis of USDA data and data collected directly from the seven states that participated in community eligibility during the 2012-2013 school year. The Center on Budget and Policy Priorities collected data on the number of schools participating in community eligibility and their Identified Student Percentages from USDA and confirmed the data with child nutrition officials in each state. The Center on Budget and Policy Priorities collected data on school breakfast and school lunch participation in community eligibility schools directly from child nutrition officials in Illinois, Kentucky, and Michigan and compared school meals participation in community eligibility schools to participation in other schools using statewide participation data obtained from USDA. The Center on Budget and Policy Priorities did not collect participation data from the states offering community eligibility for the first time to allow them to focus on implementation, with the exception of West Virginia, which had the data readily available.

¹⁹ In New York City, children in special education programs at more than 350 locations throughout the city are considered a separate school district. That school district participated in community eligibility district-wide. For purposes of this analysis, this district was counted as a single school. Enrollment data were not available, so a New York State estimate that 16,735 children would eat school meals each day was used in lieu of an enrollment count. New York City was not included in the analysis of the distribution of Identified Student Percentages discussed in note 22.

²⁰ As implementation of community eligibility becomes more widespread and the advantages are better known, this pattern may change as more schools adopt community eligibility as soon as it becomes available. In the first year of community eligibility, schools serving 7 percent of students in the three participating states availed themselves of the option. In the 2012-2013 school year, the second year of implementation, in the four states participating for the first time, schools serving 9 percent of students participated.

²¹ Data are not available for the schools in Kentucky that began operating under community eligibility for the 2012-2013 school year, so they are excluded from this analysis.

²² In nearly two-thirds of participating schools (63 percent), more than 60 percent of the students are Identified Students — most often because they are living in a household receiving SNAP benefits or are homeless. In another 22 percent of participating schools, more than 50 percent of the students are Identified Students. Kentucky provided the Identified Student Percentage for each school regardless of whether it was participating in community eligibility as part of a group. Illinois, Michigan, New York, and Ohio provided a single Identified Student Percentage for schools participating in community eligibility as a group, which was used for each school in the group for this analysis. The District of Columbia and West Virginia provided the Identified Student Percentage for each school regardless of whether it was participating in community eligibility as part of a group, except that they provided a single Identified Student Percentage

for school districts that implemented community eligibility district-wide, which was used for each school in the district for this analysis.

²³ The findings presented in this section are based on a Center on Budget and Policy Priorities analysis of USDA data and data collected directly from the seven states that participated in community eligibility during the 2012-2013 school year. Participation rates are calculated across schools to obtain a weighted average. USDA participation data on schools that are not operating under community eligibility were adjusted to eliminate the 92.7 percent attendance factor used by USDA to make them comparable to the data on community eligibility schools collected directly from participating states, which do not include an attendance adjustment.

²⁴ This analysis compares participation in schools that implemented community eligibility to participation in all other schools, including schools that were not eligible for community eligibility and schools that were eligible but chose not to implement community eligibility.

²⁵ In October 2010, lunch participation was 69 percent in schools that opted for community eligibility the following year, which is 21 percent higher than the 57 percent participation rate in other schools.

²⁶ In October 2010, breakfast participation was 44 percent in schools that opted for community eligibility the following year, which is more than two times higher than the 19 percent participation rate in other schools.

²⁷ In schools that have been participating in community eligibility for two years, enrollment declined by more than 27,000 students between October 2010 and October 2012. The increase in the number of children eating lunch or breakfast daily represents the difference between the number of children who would have eaten lunch or breakfast daily in October 2012 if the percentage of students who typically ate a school meal had remained the same as in October 2010, and the larger number of children who actually ate daily in October 2012.

²⁸ Center on Budget and Policy Priorities analysis of USDA data.

²⁹ New York initially required school districts participating in community eligibility to collect individual income data, but after the first year realized that was unnecessary and no longer requires data collection.

³⁰ See U.S. Department of Education letter to chief state school officers, July 6, 2012, <http://www2.ed.gov/programs/titleiparta/hhfkidsact2012.pdf>. The Department of Education plans to issue additional guidance on community eligibility as questions arise, and has responded to written questions from West Virginia regarding community eligibility.

³¹ As with community eligibility, a school's Identified Student Percentage may be adjusted upward for Title I purposes if it increases during a community eligibility cycle.

³² More information about the allowable data sources for Title I allocations can be found in "Non-Regulatory Guidance—Local Educational Agency Identification and Selection of School Attendance Areas and Schools and Allocations of Title I Funds to those Areas and Schools," U.S. Department of Education, August 2003, <http://www2.ed.gov/programs/titleiparta/wdag.doc>.

³³ See U.S. Department of Education letter to chief state school officers, July 6, 2012, <http://www2.ed.gov/programs/titleiparta/hhfkidsact2012.pdf>.

³⁴ "ESEA flexibility" refers to flexibility regarding specific requirements of the No Child Left Behind Act of 2001 granted to states with approved plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve quality of instruction. More information on ESEA flexibility and a list of the states with approved and pending requests for ESEA flexibility are available at <http://www2.ed.gov/policy/elsec/guid/esea-flexibility/index.html>.

³⁵ See 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.

³⁶ The Federal Communications Commission issued a letter on July 31, 2012 explaining the E-rate policy, <http://www.fcc.gov/document/universal-service-administrative-company-3>.

³⁷ See Food and Nutrition Service Memorandum, *Community Eligibility Option: Guidance and Procedures for Selection of States for School Year 2013-2014*, USDA, December 7, 2012, Attachment B, Question 18, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013os.pdf>.

³⁸ In 2011, the Center on Budget and Policy Priorities reviewed state funding streams and identified 32 states that use school meal data to allocate their primary state education funding and 22 states that use the data to allocate other state funding streams. The Center on Budget and Policy Priorities' summary of state funding tied to free and reduced price school meal eligibility as of December 2011 is available upon request.

³⁹ *Data Collection Responsibilities with the Community Eligibility Option*, Kentucky Department of Education, July 22, 2011, <http://education.ky.gov/federal/SCN/Documents/Guidance%20on%20Data%20Collection%20for%20the%20Community%20Eligibility%20Option%20Final%20HD%207-22-11.doc>.

⁴⁰ West Virginia's presentation on community eligibility and Title I is available at <http://wvde.state.wv.us/titlei/documents/CEO.pptx>.

⁴¹ See 42 U.S.C. 1759a(a)(1)(F)(vi).

⁴² The Food Research and Action Center's sample letter to a school district is available at http://frac.org/community_eligibility_schooldistrict_letter.docx.

⁴³ 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.

⁴⁴ See *FRAC Facts: Community Eligibility*, Food Research and Action Center, http://frac.org/pdf/fracfacts_community_eligibility.pdf.

⁴⁵ See *Community Eligibility: An Amazing New Option for Schools*, Food Research and Action Center, June 2013, http://frac.org/pdf/community_eligibility_amazing_new_option_schools.pdf.

⁴⁶ See *Community Eligibility Helps Low-Income Students and Schools*, Food Research and Action Center, June 2013, http://frac.org/pdf/community_eligibility_helps_low_income_students_schools.pdf.

⁴⁷ 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.

⁴⁸ USDA's calculator is available at <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013a2.xls>.

⁴⁹ 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>.

⁵⁰ 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.

⁵¹ See Food and Nutrition Service Memorandum, *Community Eligibility Option: Guidance and Procedures for Selection of States for School Year 2013-2014*, USDA, December 7, 2012, Attachment B, Question 4, <http://www.fns.usda.gov/cnd/governance/Policy-Memos/2013/SP15-2013os.pdf>.

⁵² 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. Michigan's letter is available at 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>.

⁵³ Illinois' meal count edit form is available at <http://www.isbe.net/nutrition/htmls/nslp-hhfka-ceo.htm>.

⁵⁴ Illinois posts presentation slides and recorded webinars for school districts currently participating in community eligibility and those interested in participating on its community eligibility website, which is <http://www.isbe.state.il.us/nutrition/htmls/nslp-hhfka-ceo.htm>.

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- ⁵⁵ An example of a press release, issued by West Virginia, is available at <http://wvde.state.wv.us/news/2547/>.
- ⁵⁶ 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/2aaUy5sxjJlak9ndGDHxkJ/story.html> and related tweet from U.S. Secretary of Education, Arne Duncan at <https://twitter.com/arneduncan/status/374947461330386944>.
- ⁵⁷ A television story about the Atlanta public schools implementing community eligibility can be viewed at <http://www.myfoxatlanta.com/story/22902022/tues-free-school-lunchs-beasley>.
- ⁵⁸ Illinois’ community eligibility website is <http://www.isbe.state.il.us/nutrition/htmls/nslp-hhfka-ceo.htm>. Kentucky’s community eligibility website is <http://education.ky.gov/federal/SCN/Pages/Community-Eligibility-Option.aspx>.
- ⁵⁹ The presentation slides from USDA’s introductory webinar are available at http://frac.org/usda_comm_elig_intro_webinar.pptx.
- ⁶⁰ See *2013-14 Community Eligibility Option (CEO)*, New York State Education Department, May 31, 2013, pages 1-2, <http://portal.nysed.gov/portal/page/pref/CNKC/IntDocs/Community%20Eligibility%20Option%202013-14%20Memo%20Final%20v.5-29-13.pdf>.
- ⁶¹ See U.S. Department of Education Letter to Chief State School Officers, July 6, 2012, <http://www2.ed.gov/programs/titleparta/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.
- ⁶² See Federal Communications Commission letter explaining the E-rate policy, July 31, 2012, <http://www.fcc.gov/document/universal-service-administrative-company-3>.
- ⁶³ See *Data Collection Responsibilities with the Community Eligibility Option*, Kentucky Department of Education, July 22, 2011, <http://education.ky.gov/federal/SCN/Documents/Guidance%20on%20Data%20Collection%20for%20the%20Community%20Eligibility%20Option%20Final%20HD%207-22-11.doc>.
- ⁶⁴ See *Title I and U.S. Department of Agriculture Community Eligibility Option*, Ohio Department of Education, <http://education.ohio.gov/getattachment/Topics/Other-Resources/Food-and-Nutrition/Resources-and-Tools-for-Food-and-Nutrition/Community-Eligibility-Option/Title-I-and-Community-Eligibility-Option-Guidance-2.pdf.aspx>.
- ⁶⁵ West Virginia’s presentation on community eligibility and Title I is available at <http://wvde.state.wv.us/titlei/documents/CEO.pptx>.
- ⁶⁶ For example, 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 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.
- ⁶⁷ 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>.