

---

February 25, 2015

## Take Up of Community Eligibility This School Year

### More Than 6 Million Children Have Better Access to School Meals

By Zoë Neuberger, Becca Segal, Catlin Nchako, and Kathleen Masterson

The National School Lunch and School Breakfast Programs have long sought to ease the paperwork burdens of assessing and tracking family income in schools serving very high concentrations of poor and low-income children. At those schools, little purpose is served in devoting resources to identifying the few children who *don't* qualify for free or reduced-price meals.

Congress created a new option to help support this goal, called the Community Eligibility Provision, in the 2010 reauthorization of the child nutrition programs.<sup>1</sup> The option, which allows qualifying high-poverty schools to offer breakfast and lunch at no charge to all students without having to collect and process individual meal applications, became available on a nationwide basis for the first time this school year after being piloted in 11 states.<sup>2</sup>

More than 14,000 high-poverty schools in more than 2,200 school districts across the country adopted community eligibility for the 2014-2015 school year.<sup>3</sup> These schools, which serve more than 6 million children, represent roughly half of all eligible schools.<sup>4</sup> As expected, take-up this year was higher among the highest-poverty schools, where nearly all children are already eligible for free or reduced-priced meals; in the 46 states for which data are available, 62 percent of the highest-poverty schools adopted community eligibility.

---

<sup>1</sup> For a comprehensive explanation of community eligibility and analysis of its implementation in the first two years, see Madeleine Levin and Zoë Neuberger, “Community Eligibility: Making High-Poverty Schools Hunger-Free,” Center on Budget and Policy Priorities and Food Research and Action Center, October 1, 2013, <http://www.cbpp.org/files/10-1-13fa.pdf>.

<sup>2</sup> The 11 states are the District of Columbia, Florida, Georgia, Illinois, Kentucky, Maryland, Massachusetts, Michigan, New York, Ohio, and West Virginia. (The District of Columbia is considered a state for purposes of this report.)

<sup>3</sup> This paper uses the term “school districts” to refer to Local Educational Agencies.

<sup>4</sup> Under federal law, states were required to publish a list of schools that were eligible for the Community Eligibility Provision. Based on those lists, more than 28,000 schools were eligible. Because states were permitted to use proxy data that misses some eligible schools, the number of eligible schools was likely higher. (See Zoë Neuberger, Rebecca Segal, and Mona Hussein, “More Than 28,000 Schools Can Become Hunger Free,” Center on Budget and Policy Priorities, updated July 25, 2014, <http://www.cbpp.org/cms/?fa=view&id=4144>.) Data on the number of students attending the eligible schools are not available.

Community eligibility not only reduces redundant paperwork at high-poverty schools but also makes possible huge gains in meeting vulnerable children’s nutritional needs by providing them with a healthy breakfast and lunch at school each day. Reliable access to healthy meals, in turn, better prepares students to learn. The popularity of community eligibility in its first year of nationwide implementation speaks to schools’ desire to improve access to healthy meals while reducing red tape, as well as to the option’s sound design. And the fact that take-up rates have risen each year in states that piloted the option shows that many school districts that took a “wait and see” approach liked what they saw and signed up the next year.

Nevertheless, many eligible schools have not yet implemented community eligibility, and take-up varies substantially across states. This report is designed to help state and local educators, school nutrition administrators, policymakers, and state and local anti-hunger groups identify eligible schools and districts that have not adopted the option but could benefit from it. (Appendix 1 describes resources to support implementation of the option.) The report assesses community eligibility take-up in each state for the 2014-2015 school year using three measures:

- the share of eligible *school districts* adopting it;
- the share of eligible *schools* adopting it; and
- the share of the *highest-poverty schools* adopting it.

The report summarizes data gathered by CBPP from all state child nutrition programs (the data are summarized in Tables 1 and 2 and are available via a searchable database on our website).<sup>5</sup> The data build on data collected by the Department of Agriculture (USDA) for the 2014-2015 school year.<sup>6</sup> Our overall numbers of eligible and participating schools are very similar to USDA’s figures; minor differences largely reflect the fact that we collected data after USDA, when states had additional information (see Appendix 2). Appendix 3 explains the data-collection process.

## How Does Community Eligibility Work?

Schools that participate in the school meal programs generally use a two-part process to determine which students are eligible for free or reduced-price meals:

- First, certain students are automatically enrolled for free meals through a process known as “direct certification.” These especially vulnerable students are known as *identified students* because an appropriate official has identified them as being at risk of hunger due to their participation in the Supplemental Nutrition Assistance Program (SNAP, formerly food stamps), the Temporary Assistance for Needy Families cash assistance program, or the Food Distribution Program on Indian Reservations or because they are homeless, migrant, runaway, in Head Start, or in foster care.

---

<sup>5</sup> The database is available at <http://www.cbpp.org/cms/index.cfm?fa=view&id=4187>.

<sup>6</sup> USDA’s press release is at <http://www.fns.usda.gov/pressrelease/2014/fns-001314>; its state-by-state table is at <http://www.fns.usda.gov/sites/default/files/cn/state-cep-election-data.pdf>.

- Next, schools collect school meal applications from the remaining students in order to determine which students are eligible for free or reduced-price meals based on their household income.

Community eligibility simplifies the enrollment process for high-poverty schools by enabling them to do away with household meal applications — thereby eliminating a major administrative burden — and serve breakfast and lunch at no charge to all students. Because these schools no longer have to collect school meal applications, determine and verify eligibility, and track eligibility whenever a meal is served, they can focus on education and providing two nutritious and appealing meals daily.<sup>7</sup>

A school's eligibility for community eligibility is based on its Identified Student Percentage (ISP), which is determined by dividing its total number of identified students by its total enrollment. Schools with an ISP of 40 percent or greater can adopt community eligibility. It is important to keep in mind that identified students are only a *subset* of those who would qualify for free or reduced-price meals if the school accepted meal applications; schools eligible for community eligibility typically have a much higher percentage of low-income students than their ISP.

School districts determine whether to adopt community eligibility and for which eligible schools. Close to 3,000 districts are eligible for the option district-wide, and roughly another 3,000 are eligible for a subset of their schools. Community eligibility was intended to serve high-poverty communities even if they are situated in districts that are not uniformly low-income; many districts have implemented the provision for some, but not all, eligible schools.

Under the school meal programs' traditional reimbursement structure, school districts keep track of which students eat and whether they qualify for free, reduced-price, or paid meals. School districts then receive a per-meal reimbursement, which is highest for free meals. For schools implementing community eligibility, the reimbursements are based on the school's ISP. A school's ISP is multiplied by 1.6 to approximate the share of students that would receive free or reduced-price meals if the school collected meal applications; the resulting percentage is the share of meals that are reimbursed at the highest (free) rate, while the remaining meals are reimbursed at the lowest (paid) rate. (The 1.6 multiplier was derived from analyses indicating that for every ten students who were approved for free school meals without an application, six others were approved for free or reduced-price meals based on an application.)

The fact that schools with higher ISPs receive higher reimbursement rates makes it financially easier for them to implement community eligibility. In fact, a school with an ISP of 62.5 percent or higher receives the highest federal reimbursement for *all* of its meals. In schools with a lower ISP, administrative savings from eliminating applications and economies of scale for food procurement and labor often cover the cost of meals served to students who would otherwise pay. But schools with ISPs just above 40 percent might need to provide non-federal resources if their federal reimbursements do not fully cover the cost of serving meals. Because the financial viability of community eligibility depends on local costs and other local factors, the decision about whether to adopt the option rests with school districts.

---

<sup>7</sup> A more detailed explanation of how community eligibility works can be found in Levin and Neuberger, pp. 7-11.

## What Share of Eligible School Districts Adopted Community Eligibility?

Nationwide, 2,216 school districts — 32 percent of those eligible — are using the Community Eligibility Provision in some or all schools.<sup>8</sup> The extent to which school districts adopted the option varied considerably across states. In Arkansas, for example, only 1 percent of eligible school districts adopted it (2 out of 159), compared with 81 percent of eligible districts in Montana (39 out of 48). The median state’s take-up rate for school districts was 34 percent.

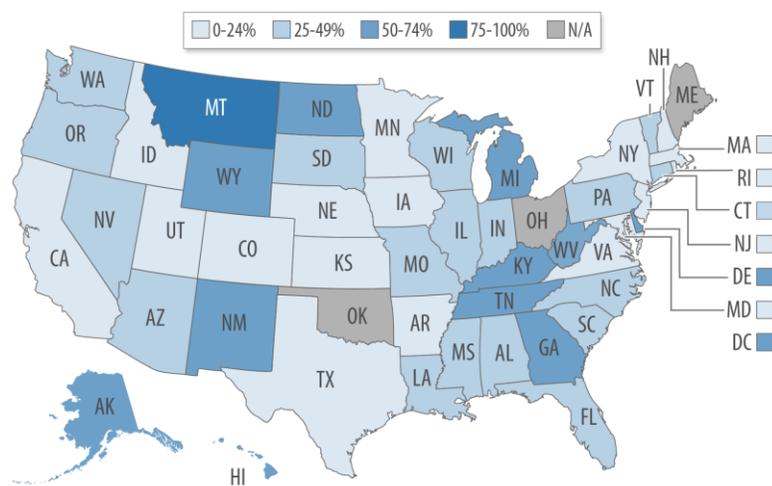
Examining which districts have implemented community eligibility and why can help state educators and nutrition program administrators identify districts that could benefit from the option but have not yet tried it, and work with them to assess the feasibility of doing so. It is important to keep in mind, however, that school districts vary tremendously in size. For example, Wayne, Michigan’s

Cesar Chavez Academy charter school with 59 students is a single school district, as is the Los Angeles Unified School District serving more than 650,000 students. Similarly, North Dakota’s Fort Yates Public School district has just one eligible school, while Maryland’s Baltimore City Public Schools could adopt community eligibility for all 196 of its schools. Program administrators and other stakeholders will likely consider these factors when developing training and education for eligible districts that have not yet adopted community eligibility.

As educators become more familiar with the Community Eligibility Provision, the share of eligible districts that participate will likely grow. Figure 1 allows for a regional comparison of community eligibility take-up by school districts; Figure 2 shows the share of school districts in each state that adopted the option.

FIGURE 1

### Percentage of Eligible School Districts Adopting Community Eligibility



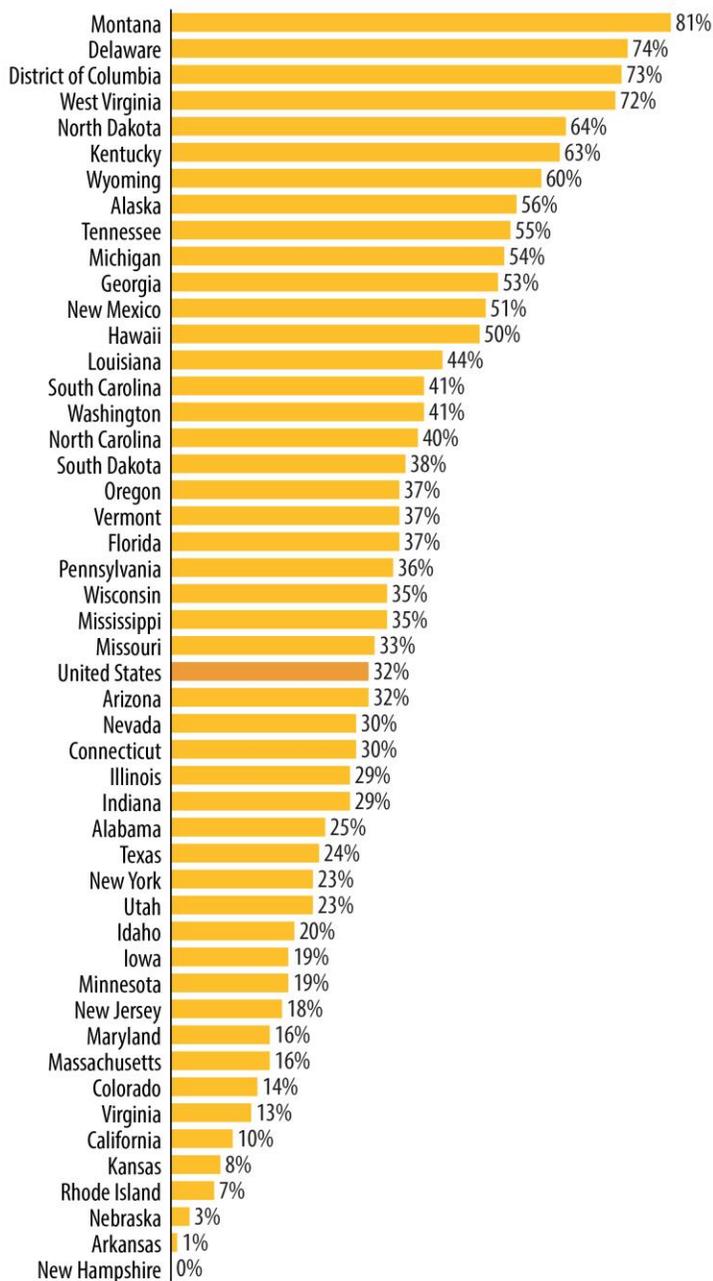
Source: CBPP analysis of data on eligible schools published by state child nutrition agencies in May 2014 and data on schools districts adopting community eligibility collected directly from state child nutrition agencies September 2014–January 2015.

CENTER ON BUDGET AND POLICY PRIORITIES | CBPP.ORG

<sup>8</sup> Under federal law, states were required to publish a list of school districts that were eligible for the Community Eligibility Provision district-wide, as well as a list of individual schools that were eligible. Links to each state’s lists can be found at <http://www.cbpp.org/research/index.cfm?fa=topic&id=112>. To determine the universe of eligible districts, this analysis includes all districts with at least one eligible school. It includes districts with schools that adopted community eligibility even if the district did not appear on the original list because in some instances the published lists were based on “proxy data” available to state rather than the actual school district data that are the basis for approving districts. For more information on requirements related to the published lists, see <http://www.fns.usda.gov/sites/default/files/SP32-2014os.pdf>.

FIGURE 2

### Percentage of Eligible School Districts Adopting Community Eligibility



Note: Data not available for Maine, Oklahoma, and Ohio.

Source: CBPP analysis of data on eligible schools published by state child nutrition agencies in May 2014 and data on schools districts adopting community eligibility collected directly from state child nutrition agencies September 2014–January 2015.

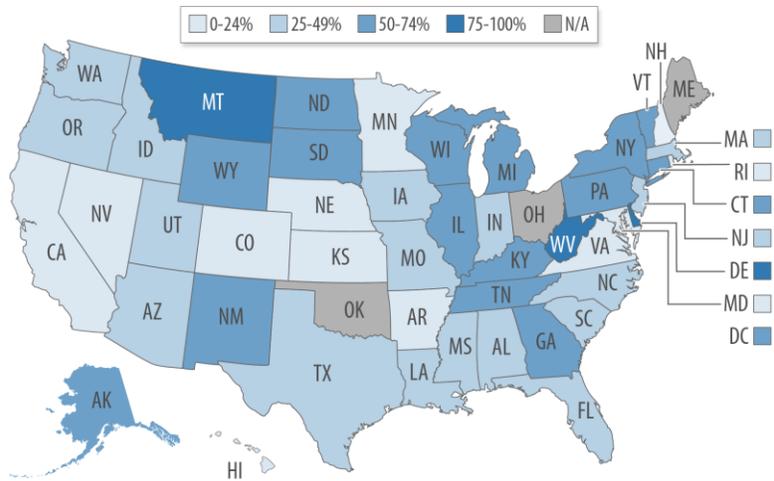
## What Share of Eligible Schools Adopted Community Eligibility?

Nationwide, 14,214 schools have adopted community eligibility for the current school year, roughly half (45 percent) of those eligible.<sup>9</sup> These 14,214 schools serve 6,661,462 students. (It is unclear what share this 6.7 million figure represents of the total number of children who could benefit from community eligibility, since data on the total number of students attending eligible schools are not available.)

The reach of community eligibility varies considerably across states, ranging from no schools in New Hampshire to nearly 1,500 schools serving more than 940,000 students in Texas. The *share* of eligible schools adopting the option also varies, with a take-up rate of 42 percent in the median state and a high of 78 percent in Montana. Figure 3 allows for a regional comparison of community eligibility take-up by schools; Figure 4 shows the share of schools in each state that adopted the option.

FIGURE 3

### Percentage of Eligible Schools Adopting Community Eligibility



Source: CBPP analysis of data on eligible schools published by state child nutrition agencies in May 2014 and data on schools adopting community eligibility collected directly from state child nutrition agencies September 2014–January 2015.

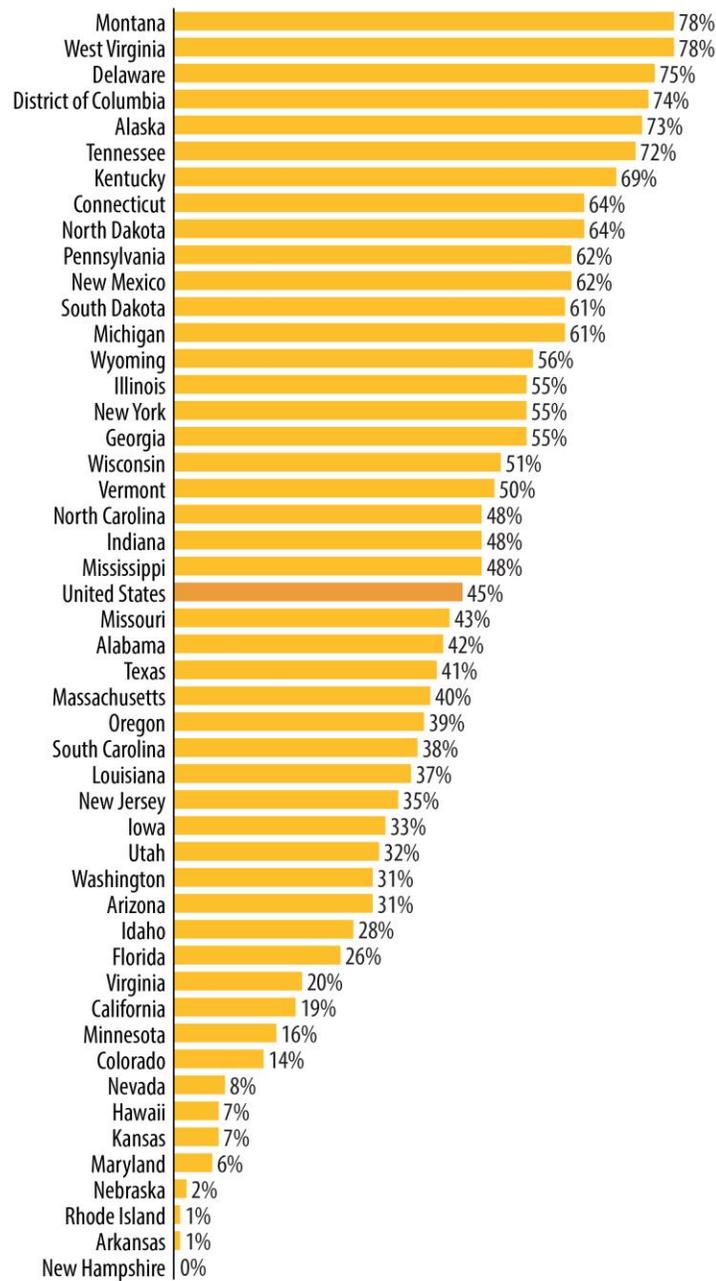
CENTER ON BUDGET AND POLICY PRIORITIES | CBPP.ORG

About two-thirds of the states have higher take-up rates among schools than districts. This likely reflects greater interest in community eligibility among districts that can implement it in more schools; these districts, with larger shares of low-income students, may be more attuned to supporting these schools to meet their students’ needs. Nonetheless, in 13 states the share of districts adopting community eligibility exceeds the share of schools. This could occur when school districts with only a single school or a few schools adopt the provision, which is sometimes the case for charter schools. Alternatively, it could reflect districts trying community eligibility in a small number of their eligible schools to see how it works.

<sup>9</sup> States were required to publish a list of schools that were eligible for the Community Eligibility Provision. Links to each state’s lists can be found at <http://www.cbpp.org/research/index.cfm?fa=topic&id=112>. To determine the universe of eligible schools, this analysis includes schools that adopted community eligibility even if the school did not appear on the original list because in some instances the published lists were based on “proxy data” available to state rather than the actual school district data that is the basis for approving districts and schools.

FIGURE 4

**Percentage of Eligible Schools Adopting Community Eligibility**



Note: Data not available for Maine, Oklahoma, and Ohio.

Source: CBPP analysis of data on eligible schools published by state child nutrition agencies in May 2014 and data on schools adopting community eligibility collected directly from state child nutrition agencies September 2014–January 2015.

## What Share of the *Highest-Poverty Schools* Adopted Community Eligibility?

Schools with ISPs of 60 percent or higher receive the highest federal reimbursement rate, making implementing the Community Eligibility Provision — for which all such schools qualify — financially easier. Schools with ISPs this high serve an overwhelming majority of low-income students, especially since (as noted) identified students are only a subset of the students who would qualify for free or reduced-price meals if the school collected meal applications. Implementing community eligibility in the highest-poverty schools ensures that nutritious meals reach the most vulnerable children.

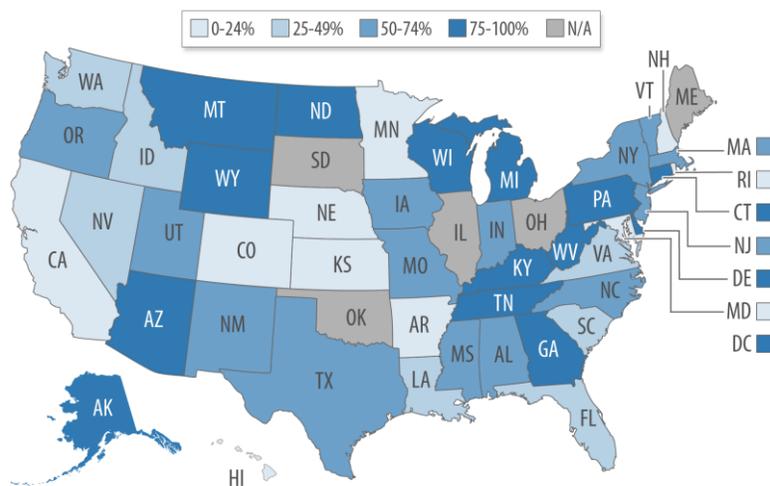
Across the 46 states for which data were available, 11,171 of the eligible schools had ISPs of 60 percent or higher.<sup>10</sup> Of these schools, 7,021 adopted it for the 2014-2015 school year, for a take-up rate of 63 percent — significantly higher than the take-up rates among all eligible schools and districts.

In the median state, 65 percent of the highest-poverty schools participated, but the rate varied by state, from 100 percent in Wyoming (2 of 2 eligible schools), 94 percent in North Dakota (16 of 17 eligible schools), and 92 percent in Kentucky (320 of 349 eligible schools) down to 0 percent in New Hampshire (0 of 8 eligible schools) and Rhode Island (0 of 41 eligible schools). The next section discusses some reasons for this variation.

States approved to offer community eligibility *before* the nationwide rollout in 2014-15 had high take-up among the highest-poverty schools. Five of those 11 states implemented the option in at least 80 percent of eligible schools with ISPs of 60 percent or higher: the District of Columbia, Georgia, Kentucky, Michigan, and West Virginia.<sup>11</sup> These early implementing states have had several years to educate districts about the option and school district administrators have had the opportunity to witness its benefits. As additional states get beyond the first year of community eligibility implementation, take-up among the highest-poverty schools will likely increase. Figure 5 allows

FIGURE 5

### Percentage of Highest Poverty Schools Adopting Community Eligibility



Highest poverty schools = schools in which the Identified Student Percentage (ISP), or the share of students who qualify automatically for free school meals, is at least 60%.

Source: CBPP analysis of data on eligible schools published by state child nutrition agencies in May 2014 and data on schools adopting community eligibility collected directly from state child nutrition agencies September 2014–January 2015.

CENTER ON BUDGET AND POLICY PRIORITIES | CBPP.ORG

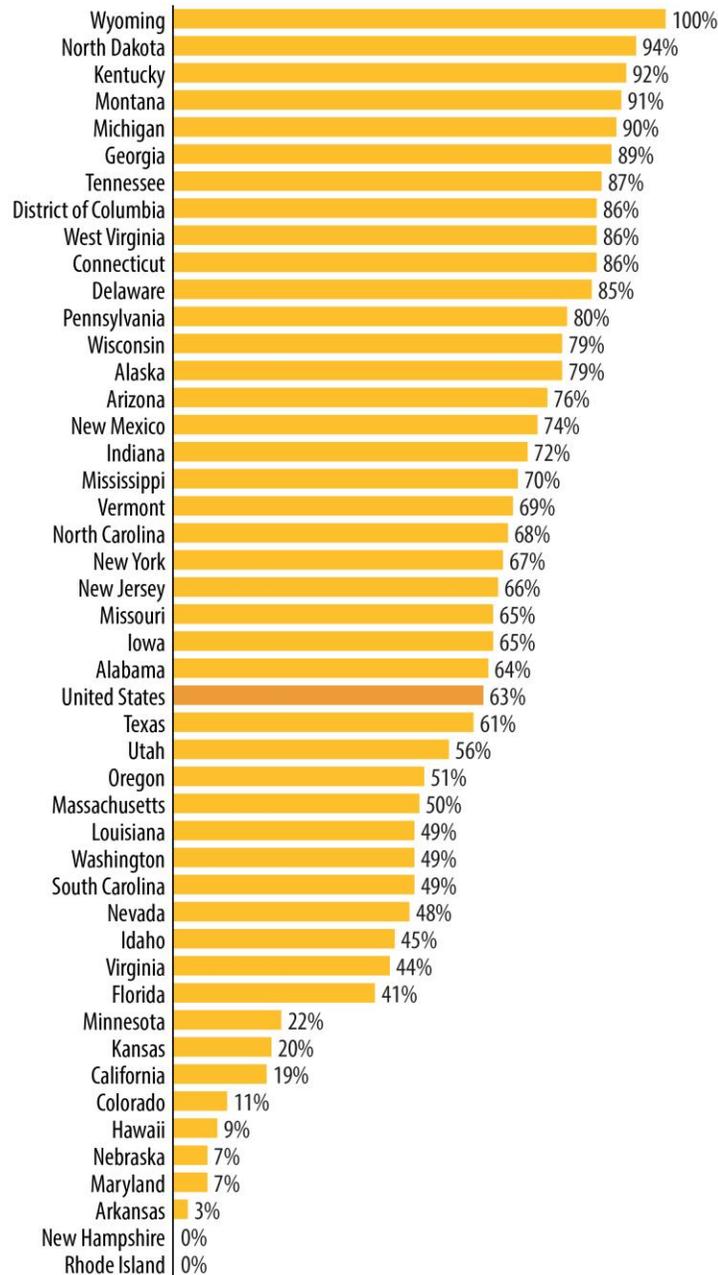
<sup>10</sup> CBPP obtained ISPs for 46 states from the lists of eligible schools published by states in May 2014 or directly from state school nutrition administrators.

<sup>11</sup> Data on which schools have an ISP of 60 percent or higher are not available for Illinois or Ohio.

for a regional comparison of community eligibility take-up by the highest-poverty schools; Figure 6 shows the share of the highest-poverty schools in each state that have adopted the option.

FIGURE 6

### Percentage of Highest Poverty Schools Adopting Community Eligibility



Highest poverty schools = schools in which the Identified Student Percentage (ISP), or the share of students who qualify automatically for free school meals, is at least 60%.

Source: CBPP analysis of data on eligible schools published by state child nutrition agencies in May 2014 and data on schools adopting community eligibility collected directly from state child nutrition agencies September 2014–January 2015.

## What Can We Learn from These Take-Up Measures?

Detailed information about which eligible districts and schools have adopted community eligibility can help school meal administrators — and other stakeholders who would like schools in high-poverty communities to offer meals at no charge to all students — to educate school districts about the option. This information can help identify barriers to participation and inform the development of more tailored training and outreach plans. For example, if larger districts in a state have widely adopted community eligibility but smaller districts have not, state staff can reach out to smaller districts to learn about their concerns and work to address them.

Below are some observations about the data and likely explanations:

- **In some states, take-up is much higher on one measure than another.** For example, in Connecticut, only 30 percent of eligible school districts have adopted community eligibility, but 64 percent of eligible *schools* have. This reflects the fact that the larger districts with concentrated poverty, including Bridgeport, New Haven, and Hartford, have all adopted community eligibility in some or all schools. By working with districts that have smaller pockets of poverty affecting only a few schools, school meal administrators and advocates could help bring the benefits of community eligibility to poor students in smaller low-income neighborhoods.

Alternatively, if a state has higher take-up among districts than schools, it could indicate that districts with larger concentrations of poverty are not participating. In Florida, for example, 37 percent of eligible districts have implemented community eligibility, but only 26 percent of eligible schools. The Dade County (Miami), Hillsborough County (Tampa), and Broward County (Fort Lauderdale) school districts have not yet adopted the provision. These districts are among the nation's seven largest and collectively serve more than 600,000 students; they include 537 schools that are eligible for community eligibility, of which 274 schools have ISPs of 60 percent or higher. Stakeholders now have an opportunity to ascertain these districts' concerns and potentially develop policy responses.

- **While take-up is higher among the highest-poverty schools, a surprising number of these schools didn't implement the option.** Because schools with higher ISPs receive higher federal reimbursements, it is not surprising that they generally are more likely to adopt community eligibility. In Mississippi, for example, 70 percent of schools with ISPs of 60 percent or higher have adopted the option, compared to 48 percent of all eligible schools. But in states where take-up is only modestly higher, if at all, among the highest-poverty schools — such as South Carolina, where take-up is 38 percent among all eligible schools and 49 percent among schools with ISPs of 60 percent or higher — it could be useful to make sure that the highest-poverty schools understand the community eligibility reimbursement structure and use USDA's tool to estimate federal reimbursements under the provision.<sup>12</sup>
- **States with very high take-up in their first year of implementation made a concerted effort to enroll eligible schools.** In Montana and Tennessee, for example, take-up is relatively high across all three measures (school districts, schools, and highest-poverty schools), reflecting supportive policies and concerted outreach efforts to eligible schools. In Montana, all eligible school districts received a letter from the governor, lieutenant governor, superintendent of

---

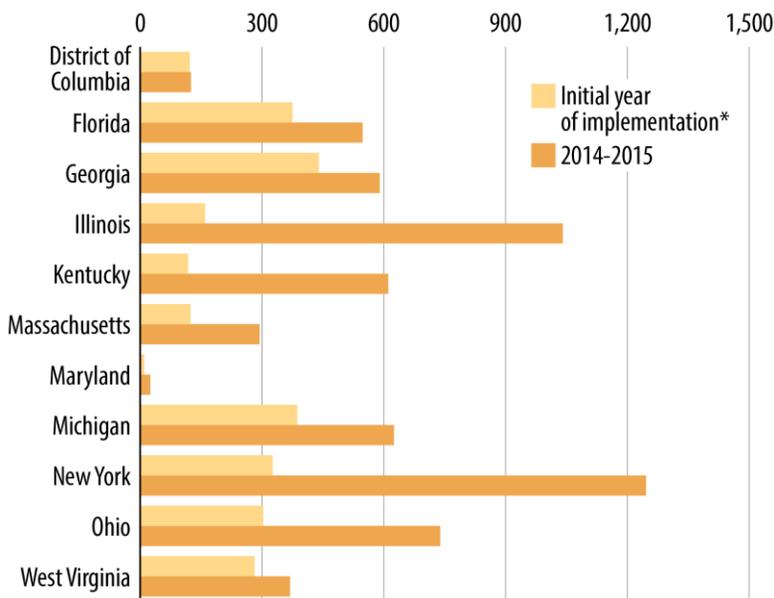
<sup>12</sup> USDA's estimator tool is available at <http://www.fns.usda.gov/sites/default/files/cn/SP15-2013a2updated2.xls>.

public schools, and first lady explaining community eligibility; a nonprofit followed up with each eligible district to make sure it had the information needed to decide whether to implement it.<sup>13</sup> Because of this early effort, Montana and Tennessee can now focus on any remaining districts that could benefit from adopting the provision. They can also share training materials, policies, and implementation strategies with states with lower take-up.

- **Take-up will likely grow over time.** The experience of the 11 states that were approved to offer community eligibility before the nationwide rollout is informative. Take-up has expanded since the initial year as school administrators have learned from their peers about their positive experiences with community eligibility. (See Figure 7.)

FIGURE 7

### In Pilot States, Number of Community Eligibility Schools Has Grown Over Time



\*Initial year varied by state, from school year 2011-2012 to 2013-2014  
 Source: CBPP analysis of Agriculture Department administrative data and data on schools adopting community eligibility collected directly from state child nutrition agencies.

CENTER ON BUDGET AND POLICY PRIORITIES | CBPP.ORG

- **Low take-up in some states likely reflects state-specific barriers.** In Arkansas, for example — where only two of the 159 eligible school districts have adopted community eligibility — it is extremely difficult for school districts to assess the financial implications of adopting it because the state uses data from school meal applications in allocating education funds among schools and has not yet set a policy for allocating funds to community eligibility schools. (Many alternative distribution options are available to states.)<sup>14</sup> Similarly, among the states that implemented community eligibility before the nationwide rollout, adoption has been substantially lower in two states (Maryland and Massachusetts) that have yet to set policies for allocating education funds to community eligibility schools.

<sup>13</sup> The Montana letters are available at [http://frac.org/pdf/MT\\_CEP\\_Chaser\\_Letter\\_40-62\\_5\\_percent.pdf](http://frac.org/pdf/MT_CEP_Chaser_Letter_40-62_5_percent.pdf) and [http://frac.org/pdf/MT\\_CEP\\_Chaser\\_Letter\\_62\\_5percent.pdf](http://frac.org/pdf/MT_CEP_Chaser_Letter_62_5percent.pdf). The text differs slightly depending on the district’s ISP.

<sup>14</sup> Alternatives to income data from school meal applications are discussed in Jessie Hewins *et al.*, “The Community Eligibility Provision: Alternatives to School Meal Applications,” Center on Budget and Policy Priorities and Food Research and Action Center, June 19, 2014, <http://www.cbpp.org/cms/?fa=view&id=4155>.

## Conclusion

Community eligibility helps ensure that low-income children who attend schools in high-poverty neighborhoods have access to breakfast and lunch each school day. This is a concrete step that policymakers can take to reduce food insecurity and other poverty-related hardships among children in areas of concentrated poverty. The fact that half of eligible schools have adopted community eligibility in its first year of nationwide implementation demonstrates its appeal. As school districts better understand its administrative simplifications and benefits for our nation's poorest students, more schools will likely adopt community eligibility.

TABLE 1

### Community Eligibility Provision (CEP) Take-Up for School Year 2014-2015

State	School districts			Schools			Student Enrollment at Schools Adopting CEP
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	
Alabama	122	31	25%	818	347	42%	180,789
Alaska	32	18	56%	168	123	73%	27,666
Arizona	91	29	32%	237	73	31%	30,763
Arkansas	159	2	1%	401	4	1%	791
California	280	28	10%	1,106	208	19%	113,513
Colorado	59	8	14%	236	34	14%	12,455
Connecticut	27	8	30%	208	133	64%	66,524
Delaware	31	23	74%	128	96	75%	47,013
District of	45	33	73%	168	125	74%	44,485
Florida	167	61	37%	2,070	548	26%	274,071
Georgia	136	72	53%	1,075	589	55%	354,038
Hawaii	12	6	50%	81	6	7%	2,640
Idaho	59	12	20%	179	50	28%	18,828
Illinois <sup>a</sup>	445	131	29%	1,877	1,041	55%	552,751
Indiana <sup>b</sup>	103	30	29%	447	214	48%	96,604
Iowa	67	13	19%	234	78	33%	32,103
Kansas	64	5	8%	258	18	7%	5,992
Kentucky	166	104	63%	889	611	69%	279,144
Louisiana	101	44	44%	897	335	37%	146,141
Maine <sup>c</sup>	NA	7	NA	NA	21	NA	5,284
Maryland	32	5	16%	396	25	6%	7,624
Massachusetts	141	22	16%	729	294	40%	134,071
Michigan	337	182	54%	1,018	625	61%	266,249
Minnesota	183	35	19%	358	56	16%	20,688
Mississippi	120	42	35%	539	257	48%	136,095
Missouri	228	75	33%	695	298	43%	106,126
Montana	48	39	81%	119	93	78%	15,802
Nebraska	29	1	3%	95	2	2%	180

TABLE 1

## Community Eligibility Provision (CEP) Take-Up for School Year 2014-2015

State	School districts			Schools			Student Enrollment at Schools Adopting CEP
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	
Nevada	10	3	30%	158	13	8%	7,917
New Hampshire	24	0	0%	53	0	0%	0
New Jersey	159	28	18%	570	197	35%	99,840
New Mexico	104	53	51%	551	343	62%	119,300
New York <sup>d</sup>	602	138	23%	2,252	1,246	55%	505,859
North Carolina	135	54	40%	1,341	648	48%	310,850
North Dakota	25	16	64%	36	23	64%	5,284
Ohio <sup>a,c</sup>	NA	230	NA	NA	739	NA	305,451
Oklahoma <sup>c</sup>	NA	18	NA	NA	100	NA	43,433
Oregon	139	51	37%	675	262	39%	103,601
Pennsylvania	259	94	36%	1,036	646	62%	327,573
Rhode Island	14	1	7%	98	1	1%	838
South Carolina	80	33	41%	588	226	38%	111,453
South Dakota	60	23	38%	231	142	61%	13,056
Tennessee	157	86	55%	1,205	862	72%	417,165
Texas	589	143	24%	3,591	1,477	41%	941,262
Utah	22	5	23%	68	22	32%	7,019
Vermont	30	11	37%	64	32	50%	7,386
Virginia	90	12	13%	444	87	20%	42,911
Washington	81	33	41%	393	122	31%	53,369
West Virginia	54	39	72%	475	369	78%	124,978
Wisconsin	215	76	35%	688	348	51%	133,232
Wyoming	5	3	60%	9	5	56%	1,255
<b>Totals<sup>c</sup></b>	<b>6,138</b>	<b>2,216</b>	<b>32%</b>	<b>30,812</b>	<b>14,214</b>	<b>45%</b>	<b>6,661,462</b>

a. Illinois and Ohio did not provide CEP student enrollment data directly to CBPP. This table includes the student enrollment data published by USDA at <http://www.fns.usda.gov/sites/default/files/cn/state-cep-election-data.pdf>

b. Indiana did not have Identified Student Percentage data on 100 schools; those schools are not included in this table.

c. Maine, Ohio, and Oklahoma did not publish a list of eligible schools. The total number of eligible schools includes the number of schools that adopted community eligibility, but not the full universe of eligible schools. The national percentages of districts and schools adopting CEP exclude Maine, Ohio, and Oklahoma.

d. In New York, in some instances multiple groups of students that are co-located in a single building are counted as separate CEP sites because they participate in separate educational programs.

Source: CBPP analysis of data on eligible schools and districts published by state child nutrition agencies in May 2014 and data on schools and districts adopting CEP collected directly from state child nutrition agencies from September 2014 through January 2015. All schools and districts that adopted CEP are counted as eligible even if they were not included on the published state list. School districts may have had more recent or complete data on which eligibility was based or additional schools may participate as part of an eligible group.

TABLE 2

## Community Eligibility Provision (CEP) Take-Up for School Year 2014-2015

Schools with 60% or higher Identified Student Percentage (ISP)

State	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible
Alabama	364	234	64%
Alaska	82	65	79%
Arizona	49	37	76%
Arkansas	96	3	3%
California	91	17	19%
Colorado	37	4	11%
Connecticut	83	71	86%
Delaware	48	41	85%
District of Columbia	73	63	86%
Florida	1,033	423	41%
Georgia	379	338	89%
Hawaii	22	2	9%
Idaho	22	10	45%
Illinois <sup>a</sup>	NA	NA	NA
Indiana <sup>b</sup>	170	123	72%
Iowa <sup>c</sup>	71	46	65%
Kansas	65	13	20%
Kentucky	349	320	92%
Louisiana <sup>d</sup>	456	225	49%
Maine <sup>a</sup>	NA	1	NA
Maryland	176	13	7%
Massachusetts	414	207	50%
Michigan	493	444	90%
Minnesota	202	44	22%
Mississippi	246	173	70%
Missouri	277	181	65%
Montana	33	30	91%
Nebraska	27	2	7%
Nevada	21	10	48%
New Hampshire	8	0	0%
New Jersey	180	119	66%
New Mexico	254	188	74%
New York <sup>e</sup>	1,301	867	67%
North Carolina	488	330	68%
North Dakota	17	16	94%
Ohio <sup>a</sup>	NA	NA	NA
Oklahoma <sup>a</sup>	NA	NA	NA
Oregon	223	114	51%
Pennsylvania	538	430	80%
Rhode Island	41	0	0%

TABLE 2

## Community Eligibility Provision (CEP) Take-Up for School Year 2014-2015

Schools with 60% or higher Identified Student Percentage (ISP)

State	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible
South Carolina	250	122	49%
South Dakota <sup>a</sup>	NA	NA	NA
Tennessee	507	442	87%
Texas	1,277	778	61%
Utah	16	9	56%
Vermont	16	11	69%
Virginia	120	53	44%
Washington	141	69	49%
West Virginia	63	54	86%
Wisconsin	349	277	79%
Wyoming	2	2	100%
<b>Totals<sup>a</sup></b>	<b>11,171</b>	<b>7,021</b>	<b>63%</b>

a. The national percentage of schools with ISPs of 60 percent or higher adopting CEP excludes the five states for which school ISP categories could not be determined – Illinois, Maine, Ohio, Oklahoma, and South Dakota. Maine did not publish a list of eligible schools. The total number of schools eligible for CEP with ISPs of 60 percent or higher does not include the full universe of eligible schools; it includes a school in Maine with an ISP of 60 percent or higher that adopted community eligibility.

b. Indiana did not have ISP data on 100 schools; those schools are not included in this table.

c. Iowa did not have ISP data on 10 schools; those schools are not included in this table.

d. The number of eligible schools with ISPs of 60 percent or higher for Louisiana may be undercounted, as there are 17 CEP-eligible schools for which ISP data are unknown.

e. In New York, in some instances multiple groups of students that are co-located in a single building are counted as separate CEP sites because they participate in separate educational programs.

Source: CBPP analysis of data on eligible schools and LEAs published by state child nutrition agencies in May 2014 and data on schools and LEAs adopting CEP collected directly from state child nutrition agencies from September 2014 through January 2015. All schools and LEAs that adopted CEP are counted as eligible even if they were not included on the published state list. LEAs may have had more recent or complete data on which eligibility was based or additional schools may participate as part of an eligible group.

## Appendix 1: Resources to Support Community Eligibility Implementation

CBPP has worked closely with the Food Research and Action Center (FRAC) to monitor implementation of community eligibility and develop resources to support states and school districts as they consider adopting it. FRAC's community eligibility website includes resources explaining all facets of community eligibility, including state resources.<sup>15</sup> USDA's Food and Nutrition Service website also has useful materials and resources.<sup>16</sup>

There are many ways to engage policymakers around community eligibility. At the state and local level, school nutrition staff can work closely with staff from other programs that use data from school meal applications to develop policies that will allow high-poverty schools to adopt community eligibility without jeopardizing other important resources.

CBPP and FRAC's recent guide for state and local anti-hunger and education advocates outlines key steps they can take this spring to ensure that high-poverty schools have the information needed to consider community eligibility.<sup>17</sup> Additional CBPP resources, some jointly published with FRAC, are available on CBPP's website.<sup>18</sup> Resources that are especially helpful to school districts considering community eligibility and stakeholders working with districts include:

- [Report on first two years of community eligibility](#)
- [Database of eligible and adopting schools](#)
- [Implications of community eligibility for Title I \(summary\)](#)
- [Community eligibility and E-rate program](#)
- [Alternatives to school meal applications for community eligibility schools](#)
- [Implementation guide](#)

---

<sup>15</sup> See <http://frac.org/federal-foodnutrition-programs/national-school-lunch-program/community-eligibility/>.

<sup>16</sup> See <http://www.fns.usda.gov/school-meals/community-eligibility-provision>.

<sup>17</sup> See <http://www.cbpp.org/files/2-20-15fa.pdf>.

<sup>18</sup> See [www.cbpp.org/childnutrition](http://www.cbpp.org/childnutrition).

## Appendix 2: How Does the Information in This Report Compare to USDA's Data?

In December 2014, USDA published state-by-state data on how many school districts and schools adopted community eligibility for the 2014-2015 school year, as well as the number of students attending those schools.<sup>19</sup> USDA's data and the data presented in this report are extremely similar; differences between the two reflect the following factors:

- USDA collected data as of September 1, 2014, while CBPP began collecting data on September 11, 2014 and continued collecting data from some states through January 2015.
- USDA and CBPP used different methodologies to assess the universe of eligible schools, resulting in slightly different nationwide take-up rates. USDA relied exclusively on lists of eligible districts and schools published in May 2014; CBPP also included schools that were not on those lists but have adopted community eligibility. (See Appendix 3 for the circumstances in which a school not on the original list could adopt community eligibility.) When we calculated the take-up rate using the USDA methodology, the result was a 50.4 percent take-up rate nationwide, consistent with USDA's published rate of 51.5 percent. (The slight difference reflects the different time periods for collecting take-up data.)

---

<sup>19</sup> USDA's press release is at <http://www.fns.usda.gov/pressrelease/2014/fns-001314>; its state-by-state table is at <http://www.fns.usda.gov/sites/default/files/cn/state-cep-election-data.pdf>.

### Appendix 3: Data Collection and Analysis

CBPP collected information on schools that have adopted community eligibility — specifically, the school’s name, ISP, and enrollment — directly from state nutrition directors between September 2014 and January 2015. We relied on the most recent data provided by each state.

Under federal law, states were required to publish, by May 1, 2014, a list of schools and districts with ISPs of at least 40 percent and those with ISPs between 30 and 40 percent (near-eligible schools and districts). The universe of eligible schools and districts to which we compared participating schools is primarily based on those published lists. We treated a district as eligible if it contained at least one eligible school. We treated a school as eligible if it appeared on a state’s published list of eligible schools or if it adopted community eligibility.

There are two circumstances under which a school might be able to adopt community eligibility even if it did not appear on a state’s list of eligible schools.

- Schools can participate individually or as a group. A group’s eligibility is based on the ISP for the group as a whole; a group may contain schools that would not qualify individually.
- USDA permitted states to base their published lists on proxy data readily available to them. Proxy data are merely an indicator of potential eligibility, not the basis for eligibility. Districts must submit more accurate information, which may be more complete and/or more recent, when applying to adopt community eligibility.

Not all states published or provided ISPs. For states that didn’t, we did not calculate the share of schools with ISPs of 60 percent or higher that have adopted community eligibility.

We also asked state nutrition directors to indicate, when possible, whether a district elected to adopt community eligibility partially or district-wide. Not every state provided this information, but in some cases, state nutrition directors also provided data on groupings within districts.

Data on groups varied among states, and we handled groups differently depending on the information that state nutrition directors provided. Some states provided no school-level data for individual schools in a group, while other states provided both group-level and school-level data. We used school-level data whenever possible but group-level data if that was all that was available.