

Community Eligibility



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An Advocate's Guide to Promoting Community Eligibility

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The Community Eligibility Provision (CEP) is a powerful new federal option that allows school districts to offer meals at no charge to all students in high-poverty schools. After a successful initial rollout in 11 states over three years, community eligibility became available nationwide in the 2014-2015 school year. In just the second year of nationwide availability, implementation in the 2015-2016 school year was widespread and robust with community eligibility reaching more than 8.5 million children in more than 18,000 schools. However, there are still many eligible schools that have not yet adopted the provision.

This guide highlights key steps that advocates and community members can take over the next few months to support school districts' adoption of community eligibility in the 2016-2017 school year and beyond. These steps are divided into three categories:

- Informing school districts
- Analysis and policy work
- Engaging relevant stakeholders

By selecting the steps best-suited to their state or school districts, advocates can facilitate broader implementation of community eligibility.

Informing School Districts

Celebrate Community Eligibility Success

One of the most effective ways to encourage districts to implement community eligibility is to demonstrate how well it works in schools that have adopted it. Publishing a case study or organizing an event to celebrate community eligibility publicly highlights community eligibility successes and provides an opportunity for local press.

Celebrating community eligibility generates enthusiasm around a school district's decision to adopt it and provides a way to promote the availability of free meals to all students in community eligibility schools. It also creates a platform for education officials, teachers, parents, and nutritionists to discuss how community eligibility can help students.

Action Steps:

- Identify schools and districts that have implemented community eligibility and principals, school nutrition directors, or superintendents who would be good champions.
- Suggest to the district that you would like to hold an event at one of its schools, ideally around lunch time to allow photo opportunities in the cafeteria. Or, if the school offers breakfast in the classroom, this could also be a good opportunity to showcase the program and provide an opportunity for pictures in the classroom.
- Pull together other influential speakers, such as elected officials, nurses, and parents, to speak at the event or write an op-ed in support of the program.
- In addition to or as an alternative to an event, interview the superintendent, principals, the school nutrition director, teachers, parents, and other key stakeholders and write up a case study describing how community eligibility is making a difference for students and the school.

Examples and Resources:

- [Community Eligibility Event in Somerset, MD](#)
- [USDA Blog – Event at Richmond City Schools hosted by Virginia Hunger Solutions](#)

Provide Opportunities for Districts to Learn About Community Eligibility

Districts that have not yet adopted community eligibility likely still have questions about it and could benefit from learning the basics and hearing how successful community eligibility is in other districts. Effective promotional activities include issuing a press release, using social media, offering webinars or conference calls for school districts, and posting materials such as fact sheets, calculators, and sample forms on websites.

Action Steps:

- Work with your state agency to host an in-person regional or statewide training on community eligibility.
- Weave community eligibility into relevant public speaking opportunities about childhood hunger.

- Check in regularly with school nutrition directors in target districts to answer their questions and, as community eligibility deadlines approach, find out where they are in their decision-making process.
- Create a webinar for school districts in your state, perhaps in collaboration with your state child nutrition director or state School Nutrition Association; state officials are often happy to participate if you organize the webinar or call and handle the logistics.
- Utilize social media to promote your community eligibility outreach materials such as one pagers and infographics, or CBPP/FRAC materials.
- Partner with key education groups (as discussed below) to provide presentations and information to their members about community eligibility.

Examples and Resources:

- [Introductory Community Eligibility PowerPoint](#)
- [Overview of Community Eligibility](#)
- [FRAC and California Dept. of Education Community Eligibility Webinar Recording and Slides](#)
- [Virginia Hunger Solutions Community Eligibility Provision website](#)
- [Hunger Solutions New York Community Eligibility Infographic](#)
- [One-minute motion graphic on community eligibility](#)

Target the Highest-Poverty Districts for Individualized Technical Assistance

Reimbursements in community eligibility schools are based on the share of students approved for free school meals without an application, known as the identified student percentage (ISP). Schools and districts with higher ISPs receive more in federal reimbursements and will have an easier time covering their costs using community eligibility. Schools that have an ISP of 62.5 percent or higher will have 100 percent of their meals served reimbursed at the free rate. For targeting purposes, any school with an ISP of 55 percent or higher is unlikely to have financial difficulty operating under community eligibility. For these schools, finances should not be an obstacle to implementation, though they may need assistance in working through other barriers.

Action Steps:

- Utilize the [FRAC database](#) to determine which eligible districts have adopted community eligibility and which have not.
- Of the eligible districts and schools that have not adopted community eligibility, look at the ISPs and target those districts with more eligible schools, particularly those with district-wide ISPs of 55 percent or more or a high number of schools with ISPs over 55 percent.
- Contact the district school nutrition director or school business official to determine any barriers or challenges. Often the school nutrition director does not make the final decision on whether to implement community eligibility. In many districts, the superintendent, school business officials, and school board are crucial decision-makers and should be included in outreach to target districts.

- Facilitate connections between interested school districts and other districts already using community eligibility and provide opportunities for peer-to-peer networking for school nutrition directors and other school officials.
- Provide the school district with information and resources on how they can group schools to facilitate community eligibility implementation and assess the financial implications of implementing community eligibility. Offer to assist with utilizing the USDA estimator or other tools that can help schools in their decision making process.

Examples and Resources:

- [USDA Federal Reimbursement Estimator](#)
- [Hunger Taskforce \(WI\) School Grouping Tool](#)
- [Hunger Taskforce \(WI\) School Grouping Outreach Letter](#)
- [Center for Public Policy Priorities \(TX\) Grouping Calculator](#)
- [USDA Community Eligibility Webinars – Financial Considerations and Making “Cents” of CEP at 40-50% ISP](#)

Analysis and Policy Work

Release a State or Local Report

Releasing a report on the status of community eligibility implementation in your state can provide valuable information to engage stakeholders and guide targeted outreach during the 2016-2017 school year.

Action Steps:

- If you already publish a report on school breakfast or school meal participation in your state, look at ways to incorporate community eligibility metrics including how many districts and schools are eligible and how many are participating.
- Utilize the [FRAC database](#) or request data from your state agency on the schools and school districts that have opted in and compare it to the list of eligible schools and school districts for the 2016-2017 school year.
- For schools or districts that have opted into community eligibility, compare school breakfast and lunch participation from one month in the school year prior to implementation to the same month in the school year after implementation.
- Highlight school districts with increased school meal participation, especially those using alternative service models for breakfast or other innovative strategies to reach more low-income children.
- Provide a list of school districts and schools that could benefit from community eligibility but did not opt in for the 2015-2016 school year.

Examples and Resources:

- [Maryland Hunger Solutions – School Breakfast Report Card SY 2014-2015](#)
- [Oklahoma Policy Institute – Community Eligibility Can Help Make Oklahoma Schools Hunger Free Issue Brief](#)
- [Hunger Task Force - Wisconsin School Breakfast Report SY 2014-2015](#)

Address Policy Concerns Related to Eliminating School Meal Applications

Schools using community eligibility no longer collect school meal applications. While this is an important simplification for school nutrition departments, most school districts and state education agencies have been using household income data from school meal applications for other educational purposes besides qualifying children for free or reduced-price meals. Through careful planning, states have been able to resolve issues that arise when schools stop collecting meal applications. USDA and the U.S. Department of Education do *not* require school districts to collect individual student income data to participate in federal programs, including Title I (federal education funding for disadvantaged students), and they have been working closely to provide guidance to states and school districts. CBPP and FRAC staff are available to help work through state-specific issues related to state funding, Title I, and other uses of meal application data.

Action Steps:

- Learn about your state’s formula for state education funding and whether funding is targeted to schools or districts based on school meal program data. If so, alternative data sources are readily available to fill these needs, such as the school’s free meal claiming percentage. Find out what policies the state may have put in place for community eligibility schools.
 - As a starting point, check FRAC and CBPP’s [summary of state education funding policies](#). Please note that state policies may have changed so also check with your state agency about the current policy.
 - Encourage the state agency to issue clear guidance, if it has not already, and provide opportunities for technical assistance for school districts.
 - Help to promote the state policies for use of alternative data sources and ensure that school districts are aware of them.
- If your state requires districts to collect *individual* income data outside the school meal programs for state education funding purposes, encourage the state to translate and simplify the income data collection form, which is no longer governed by National School Lunch Program rules.
- Find out if your state has convened a working group to address any issues that may arise related to the lack of individual income data. Such a group can work through the implications of not collecting school meal applications for programs that currently rely on the data.
 - If your state has not created a working group, this could be a good opportunity to leverage the relationships you have cultivated with your state and local leaders to help bring the key people together.
 - Ideally, this group would be led by a high-level administrator within the state education department who can bring staff together from multiple areas, including:
 - School nutrition,

- Title I,
 - Assessment,
 - School funding,
 - Accountability, and
 - E-rate.
- States may have an existing workgroup that they can utilize for this purpose, or they may find that once a group is set up, it can address other challenges facing the education department.

Examples and Resources:

- [Texas Education Agency - Community Eligibility Guidance Letter, April 4, 2014](#)
- [California Department of Education - Household Income Forms](#)
- Simplified household income form ([Iowa](#))
- [FRAC and CBPP – The Community Eligibility Provision: Alternatives to School Meal Applications](#)
- [US Department of Education - Title I Guidance](#)
- [CBPP - Summary of Implications of Community Eligibility for Title I](#)
- [Federal Communications Commission - E-rate Guidance](#)

Improve Direct Certification Systems

Direct certification — the process by which children are automatically enrolled for free school meals without an application based on data from another program, such as the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families cash assistance (TANF)—in large part determines which schools qualify for community eligibility and what percentage of their meals will be reimbursed at the free rate.

States and school districts whose direct certification systems effectively identify children automatically eligible for free meals tend to have more eligible schools, often with higher ISPs (which makes the provision more financially viable). States and school districts whose direct certification systems *miss* many such students can improve their systems so the ISP more accurately reflects the extent of poverty in the school. Schools and districts can improve their chances of qualifying for community eligibility or increase their free claiming percentage under community eligibility by adopting strategies to directly certify more students.

Action Steps:

- Check the latest [report to Congress](#) to find out if your state is meeting federal direct certification benchmarks for the 2013-2014 school year and beyond.
- If your state is not meeting the benchmark, the state agency is required to develop a Continuous Improvement Plan (CIP). You can request to see your state's CIP from the state agency to determine what steps are being taken to improve the direct certification system.
- Find out from your state agency which program data (SNAP, TANF cash assistance, FDPIR, Head Start, foster care, etc.) your state utilizes and how often direct certification data matches occur. All states are required to conduct direct certification for children in SNAP households at

least three times each school year, but the other programs are optional. The more programs a state includes in its data matching process and the more often data-matching occurs, the easier it is for school districts to certify low-income children without an application.

- Discuss with your state agency options to expand direct certification to additional programs through [USDA's Medicaid direct certification demonstrations](#) and improve systems through [USDA's Direct Certification Improvement Grants and Administrative Review and Training Grants](#).
- Encourage and work with your *state agency* to provide technical assistance to school districts and guidance to maximize the effectiveness of direct certification systems. For example, ensure that there are opportunities each year for school district staff responsible for direct certification to receive training on how to use the system. States also can develop mechanisms to monitor whether school districts are using the direct certification system and follow up with technical assistance if not; even the best system is not effective if it is not utilized.
- Work with *school districts* to increase the number of identified students by:
 - Conducting more frequent data matches between student enrollment lists and SNAP and TANF data;
 - Extending eligibility to all children in households receiving SNAP and TANF benefits;
 - If the state system allows, looking up individual students in the direct certification database to directly certify new students or those who provide a case number on an application;
 - Closely coordinating with homeless liaisons, local shelter directors, migrant education coordinators, foster care agencies, and Head Start agencies to update lists of certified children; and
 - Working with advocates to conduct SNAP outreach to ensure that eligible children receive SNAP benefits and are counted as identified students.

Examples and Resources:

- [USDA Community Eligibility Brief – Increasing Your ISP with Direct Certification](#)
- [CBPP and FRAC – Improving Direct Certification Will Help More Low-Income Children Receive School Meals](#)
- [USDA FNS Policy Memo - Questions and Answers on Extending Categorical Eligibility to Additional Children in a Household](#)
- [Hunger Solutions New York – Direct Certification Tip Sheet for Community Eligibility](#)
- [End Hunger Connecticut SNAP Outreach in Schools Toolkit](#)
- [California Collaboration among Advocates and State Agency Leads to Increase in Direct Certification](#)

Engaging Relevant Stakeholders

Engage Education Groups

Reach out to key education stakeholder groups to make sure they understand the benefits of community eligibility and alternative data sources when applications are eliminated. Local education

organizations and associations can be a great channel for publicizing opportunities to learn about community eligibility and reach other stakeholders in the school community.

Key stakeholders include:

- School superintendents' and principals' associations,
- School board members and associations,
- School business officials' associations,
- Nonprofit education advocacy organizations,
- Teachers' unions, and
- Parent associations.

Action Steps:

- Work with these groups to create targeted resources to spread the word about community eligibility to their members, including issue briefs, one-pagers, newsletter articles, and other resources.
- Ask to speak at regional meetings or conferences or co-host a webinar on community eligibility featuring school districts in your state that have successfully implemented it.
- Offer to provide a guest blog, newsletter article, or social media messaging about community eligibility, especially when the lists of eligible school and districts are published in May and during School Breakfast Week in March or National School Lunch Week in October.

Examples and Resources:

- [California School Board Association – Community Eligibility Fact Sheet](#)
- [Sample CEP Presentation Slides](#)
- Education Organization Blog Posts:
 - [AASA, the Superintendents Association](#)
 - [National Education Association Healthy Futures](#)
 - [National PTA](#)
 - [Education Trust](#)

Reach Out to Key State and Local Stakeholders

Engaging state and local leaders, including the governor, superintendent of education, senators, members of Congress, state legislators, mayors, and school board members, can spread the word about the benefits of community eligibility, foster collaboration, and work through any barriers that school districts face when considering whether to adopt this powerful meal option for high-poverty schools.

Action Steps:

- At key points, these leaders can use social media, issue a press release, or write an op-ed or blog post about the benefits of community eligibility.
- Ask your representatives in Congress or the state legislature or local leaders to send a letter asking superintendents of eligible schools in their district to promote and adopt community eligibility.

- Invite your representatives in Congress or state leaders to host a conversation about community eligibility with local leaders and key education stakeholders, including superintendents, school board members, non-profit education groups, teachers' unions, or parent associations.

Examples and Resources:

- [CA letter from State Superintendent of Education](#)
- [Model letter from Member of Congress](#)
- [MT Governor's Letter \(schools with ISPs of 40-62.5 percent\)](#)
- [MT Governor's Letter \(schools with ISPs of 62.5 percent and above\)](#)