

# Community Eligibility Partial Implementation Guide



## What Is the Community Eligibility Provision (CEP)?

Community Eligibility Provision allows high-need schools to offer breakfast and lunch to all students at no charge. Any school district, group of schools in a district, or school with 40 percent or more “identified students” — children who are certified eligible for free school meals without a household application — can choose to participate. Community eligibility increases participation, ensuring that more students experience the educational and health benefits linked to eating school meals, reduces administrative paperwork for school nutrition staff, improves school nutrition finances, and eliminates unpaid school meal fees.

## What Is Partial Implementation?

Partial implementation allows school districts to implement CEP in individual schools, a group of schools, or multiple groups of schools to participate in CEP instead of implementing it district-wide.

A Local Education Agency (LEA) has the discretion to group schools together to maximize identified student percentage (ISP), which allows them to increase the number of students with access to school breakfast and lunch at no charge and to maximize the percentage of meals reimbursed at the federal “free rate” to improve the financial viability of CEP.

## Why Districts Choose CEP

- **Less administrative work:** Schools no longer have to collect and verify school meal applications.
- **Increased participation:** A recent [U.S. Department of Agriculture report](#) found that community eligibility increased breakfast participation by 12.1% and lunch participation by 6.9%, compared to similarly eligible schools that did not participate.

- **Facilitates implementation of innovative breakfast service models:** Since schools don’t have to collect school meal fees or count each meal served by fee category, it is easier to implement breakfast in the classroom and “grab and go” service models that can boost breakfast participation further.
- **Improves the financial viability of school nutrition programs:** When participation increases, school districts can take advantage of economies of scale and reinvest additional revenue to improve nutritional quality and provide staff training.
- **Eliminates unpaid meal fees:** When all children eat at no charge, the school district does not have to collect school meal fees from families or struggle with school meal debt.

## Benefits of Partial CEP Implementation

While full implementation of CEP is ideal, districts find that using partial implementation allows them to extend the benefits described previously to some of their schools and students. Partial CEP implementation also reduces the overall administrative work being performed across the district.

### Important to Remember

- Schools participating in CEP must offer school breakfast and lunch to all students at no charge.
- They are reimbursed using a formula based on the ISP (ISP x 1.6).
- Must cover with non-federal funds any costs of providing meals to students that exceed the federal reimbursement.

## Identified Students

School districts and schools participating in community eligibility use their identified student percentage to determine their federal reimbursement. Identified students include children directly certified through data-matching because their household participates in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or the Food Distribution Program for Indian Reservations (FDPIR), and in some states, Medicaid, as well as children who are certified for free meals without an application because they are homeless, migrant, enrolled in Head Start, or in foster care.

## Calculating CEP Reimbursements

Community eligibility schools are reimbursed for meals served based on a formula. Reimbursements are calculated by multiplying the percentage of identified students (ISP)\* by 1.6 to determine the percentage of meals that will be reimbursed at the federal free rate. For example, a school with 50 percent identified students would be reimbursed at the free rate for 80% of the meals served (50 multiplied by 1.6 = 80) and at the paid rate for 20%. There is no reduced-price reimbursement rate under community eligibility.

School districts may also participate districtwide or can group schools within the district into one, or multiply groups. However, the school, group of schools, or school district must have an identified student percentage of 40% or higher.

Examples of the percentage of meals reimbursed at the free and paid rates based on the identified student percentage (ISP) are given in the chart below.

ISP	Free	Paid
40%	64%	36%
45%	72%	28%
50%	80%	20%
55%	88%	12%
60%	96%	4%
65%	100%	0%

\*ISP x 1.6 = % reimbursed at federal free rate.

## Grouping

Grouping schools allows school districts to maximize federal reimbursement and increases the number of schools adopting community eligibility and supports the financial success of community eligibility. Its importance cannot be overstated.

In the following example, the elementary, middle, and high schools are electing CEP as a group with an aggregate ISP of 55.8%. Individually, the middle school with an ISP of 37.5% is not eligible to participate in CEP. Grouped with the other schools, the LEA can elect CEP in all three schools. Including the middle school increases access to school breakfast and lunch at no charge to 800 students and the aggregate ISP of 55.8% multiplied by 1.6 equals 89.28% of meals reimbursed at the federal “free rate.”

School Name	Number of Identified Students	Number of Enrolled Students	Identified Student Percentage (ISP)
Example Elementary	200	350	57.14%
Example Middle	300	800	37.5%
Example High	700	1,000	70%
<b>TOTAL</b>	<b>1,200</b>	<b>2,150</b>	<b>55.8%</b>

## Communicating Partial CEP

Clear communication to families and district staff is critical when community eligibility is implemented in part of the district. This communication is important to ensure that families know which schools are offering free school meals. This is particularly essential for families who have some children attending community eligibility schools and some attending schools not participating in community eligibility in order to ensure that these families complete school meal applications. School districts can use their normal communications channels to inform families. For example, they can post the names of the schools that are offering meals to all students at no charge (participating in community eligibility) on the school district website, as well as individual school websites; send information about which schools are participating to families in enrollment packets and backpack mail; or include information in school robocalls.

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When a child transfers from a community eligibility school to a non-community eligibility school, families may need to submit a school meal application to ensure that their child does not miss out on the much-needed free or reduced-price meals or accrue school meal fees as their school meal application is being processed. Because school districts collect school meal applications for the household, as opposed to individual student applications, school districts should communicate to parents and guardians whether or not they need to fill out a form when one of their children transfers to a school that does not participate in CEP.

There are some protections for students who [transfer from a CEP](#) (or other special provision) school to a non-CEP (or other special provision) school to help minimize disruptions in meal benefits. If a student transfers from one school to another within the same school district, the school must provide free meals for the first 10 days or until an eligibility determination can be made (whichever comes

first), and the state agency can allow the district to provide free meals for up to 30 operating days or until an eligibility determination can be made (whichever comes first). If they transfer to another school in a different LEA, the new school may provide meals at no cost to the student for up to 10 operating days or until an eligibility determination is made (whichever comes first), and the state agency can allow the district to provide free meals for up to 30 operating days or until an eligibility determination can be made (whichever comes first).

Letters communicating grace periods and shifts in CEP implementation can be combined with free and reduced-price meal applications provided to families when their student enrolls in a new school. School districts can take steps to ensure that it is communicated effectively, such as posting information on websites and different communication channels, as well as distributing information to school staff.

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## Partial CEP in Action

### CASE STUDY 1

#### Houston County, Georgia

- 30,000 students
- 38 schools, 19 participating in CEP
- District-wide ISP: 31.6%, school group ISP: 50.56%

The Houston County School District first piloted CEP with 10 schools in school year (SY) 2013–2014, growing to a total of 19 CEP schools by school year 2019–2020 and has maintained those sites to date. Prior to the nationwide implementation of CEP, the district used Provision 2 to offer free meals in some of their schools, but determined that CEP offered a better approach for the district and was better able to equip them to reduce barriers for hungry students to be fed.

When the district was initially implementing CEP, school nutrition staff met with a group of principals and explained that increased participation was needed to leverage economies of scale and reduce costs.

For Houston County, getting administrators on board was essential to ensure success. Presenting data on accountability, test scores, and student behavior was a

helpful way to get them interested and aligned with the program’s goals. The administration understood that participation needed to increase so that more students were benefiting from the educational impacts linked to participating in school meals and to support the school nutrition finances. The school nutrition staff and the administration worked together to successfully partially implement CEP in the district.

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*“There’s a culture shift that eventually happens. Students come in, grab a breakfast, and go to class, and that becomes a routine and their expectation.”*

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CEP also made it easier for the district to implement innovative models, and for the school year 2015–2016, the district was able to secure a [Partners for Breakfast in the Classroom](#) that supported the implementation of breakfast in the classroom in many of the district’s CEP schools. Breakfast in the classroom and other innovative school breakfast models have been shown to increase participation.

Not surprisingly, breakfast participation skyrocketed during the third year of partial CEP implementation that was combined with breakfast in the classroom, growing from 53% to 84% of students in the 10 schools that first implemented CEP. Lauren Koff, of the Houston County School Nutrition Program, explained that “There’s a culture shift that eventually happens. Students come in, grab breakfast, and go to class, and that becomes a routine and their expectation.” This change in student culture can take time, which may explain the delayed onset of increased participation in the school breakfast program.

Houston County schools in Georgia implemented CEP at 10 schools, SY 2014. They then recertified CEP with 16 schools in SY 2016, and recertified CEP with 19 schools in SY 2020. Because of the onset of the pandemic, Houston Country schools shut down after March 13, 2020, but their data goes through the end of the year as they kept serving via drive-thrus and automatically including breakfasts along with lunch packs. SY 2020 also included the first high schools on CEP, which have significantly larger populations affecting those numbers.

You can see the effect on the original group of 10 schools below, but it’s important to note that including all the other schools may have diluted the visibility of the impact.

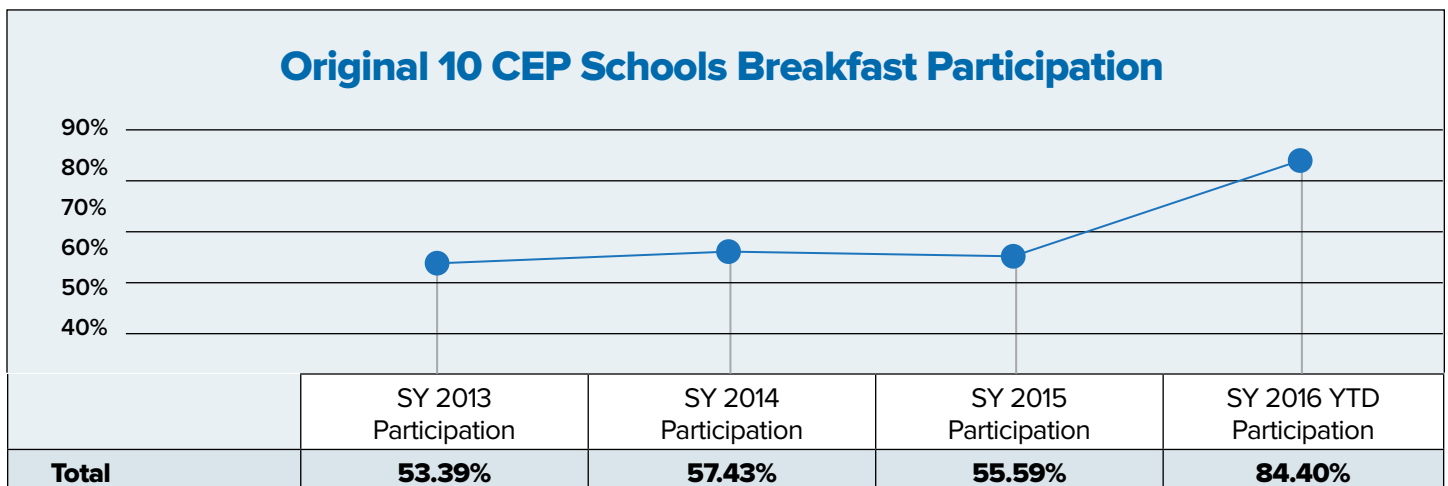
**In their own words:**

*“Our goal is always to reach as many children as possible, and community eligibility is a fantastic avenue to accomplish this, but it is essential to maintain a financially viable program to continue serving our students. While increasing meal access is the priority, CEP has improved relationships with administration and the community as well. We were fortunate enough to have the opportunity to closely examine increased meal access in our district, and when discussing CEP with administration, we are able to describe how we have seen the very real benefits of fewer student absences, no meal charges, increases in test scores, and decreases in discipline referrals once schools settle into their routine and meals become an integral part of their school culture.”*

*“Partial implementation is similar to the fact that many districts already have schools that are Title I and non-Title I. This is no different and offers many benefits to the students, staff, and families at these schools. Clear communication about how CEP schools are determined is crucial and once established, any concerns about partial CEP dissipated after our initial implementation.”*

**Lauren Koff**  
**Dietitian, Houston County School Nutrition Program**

**Original 10 CEP Schools Breakfast Participation**



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## CASE STUDY 2

### Portland Public Schools, Oregon

- 46,000 students
- 92 schools and programs, 50 participating in CEP
- District-wide ISP: 24.82%, school group ISP: 40.33% and 41.66%

In the 2013–2014 school year, they were using Provision 2 in two schools, but enrolled 25 schools in CEP in the 2014–2015 school year when it became available. The district has experienced demographic shifts and school restructuring, which forced it to reduce their CEP schools to 13 in the 2017–2018 school year before expanding to 50, the current number of schools participating in CEP.

The district identified the most important lesson learned from the difficulties of taking schools off CEP as being the importance of strategically grouping schools. Now, the nutrition staff thinks about two–three years ahead when students will move schools due to their grades and account for school boundary changes. For example, when the district shifted school boundaries in the southeast area of Portland, the school nutrition department responded by re-grouping schools to isolate north, northeast, and southwest Portland sites to reduce the risk of needing to recertify schools.

CEP implementation has made schools more efficient and allowed staff to focus on food service rather than spending resources on determining eligibility and handling meal fees. The increased efficiency also results in faster service in the lunch line. Being able to offer meals to all students

at no charge has helped eliminate stigma felt by students regarding participation and led to high schools, which have traditionally had some of the lowest participation in school lunch in the district, to have the highest participation in school lunch.

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#### In their own words:

*“We have always tried to extend meal benefits to as many students as possible. Prior to CEP, we offered free breakfast to several schools through Provision 2. We utilize every resource we can to make sure as many students as possible have access to healthy meals at no charge. Many of the schools where we implemented CEP have students who are at higher risk of experiencing food insecurity.”*

*We have a commitment to equity, which means that we provide as many resources to students who need them and we consistently reassess the needs of our various communities and implement programs whenever possible. The benefit from the operations perspective is that the more students we are able to feed, the more efficiencies we can build into our services, allowing our teams to focus on preparing and serving the food, rather than on eligibility, meal accounts, and cash handling/banking. We are able to focus more of our resources on the food and the people making the food.”*

**Whitney Ellersick**  
Senior director, Nutrition Services, Portland Public Schools

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## CASE STUDY 3

### Cypress-Fairbanks Independent School District, Texas

- 118,000 students
- 90 schools, 34 schools participating in CEP
- District-wide ISP: 58%

Cypress-Fairbanks is a suburban district that has experienced an increase in the number of its students who are economically disadvantaged. Currently, 34 schools participate in CEP, but they began with just four schools, added 16, and then increased again to 34 CEP schools.

The district was motivated to implement CEP in part of their district by the desire to feed more students. Without CEP,

students were falling through the cracks in the application process. Grouping made expanding CEP to other schools possible and having an incredibly supportive administration helped the nutrition staff make that decision.

Scratch cooking is performed out of a central kitchen. Although many of the student’s favorite bakery items are made there, innovative breakfast models have been the most significant help to participation. About 10 years ago, a “grab and go” breakfast service model was implemented at 40–45 elementary schools. Now, several middle and high schools have implemented grab and go too. One high school operates a “second chance” breakfast, which resulted in 400–500 more breakfasts being served a day

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at the school. Overall, breakfast participation has increased due to CEP, which has helped the staff expand “grab and go” breakfast due to CEP’s reduced administrative work.

Staff at these schools have noticed an improvement in student behavior, which is consistent with the research on the impact of school meals on student behavior.

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## CASE STUDY 4

### Jefferson County Public Schools, Kentucky

- 96,000 students
- 147 schools, 138 participating in CEP
- District-wide ISP: 57.17%

Jefferson County public schools is a large urban district that covers a significant geographic area, with some schools on either end of the county about 35–45 minutes apart. Like many districts, enrollment has been down since

the pandemic’s start, about 7,000 students, and current enrollment is around 96,000.

Last year, they were able to regroup schools and add an additional campus, so that only nine schools in their district do not participate in CEP. Because of the increased participation, reduced stigma, and benefits to administration, the district has successfully maintained breakfast after the bell models at several campuses, which in turn also increases participation. Ideally, the district would like to implement CEP district-wide eventually.

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## CASE STUDY 5

### Anchorage School District, Alaska

- 44,000 students
- 83 schools, 34 participating in CEP
- District-wide ISP: 29.5%, school group ISP: 50.8%

Anchorage School District’s motivation for implementing CEP is twofold: feeding students and keeping administrative costs down. Nutrition staff recognizes that administrative costs are not always the most efficient way for their department to spend money. When schools don’t participate in CEP, they need to allocate funds for the labor required to process applications, and that’s money that cannot be spent on food. By implementing CEP, schools have more money available for meal quality, and they can feed more students.

The district first implemented partial CEP during SY 2014 with 30 schools. They increased that number to 37 schools but now have 34 schools with CEP. When a school closed recently, the district had to recertify 25 schools. To better understand the risks and benefits of grouping particular schools together, the district created a tool they’ve shared with others on the SNA website. It helps identify schools with

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*“The district’s mission is in educating all students for success in life, and nutrition is vital for that mission.”*

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high and low average daily percentage (ADP) and high and low ISP and plots them to determine the best ways to group them. Typically, that means pairing high ISP schools with other schools that have a high ADP. For Anchorage School District, grouping helps expand CEP and minimize risks with recertification, and they found that having a greater number of groups is also beneficial. They went from having three groups of schools to having five, and they may increase that number to six in the future.

Gavin Northey, the assistant director of school nutrition, explained that, “The district’s mission is in educating all students for success in life, and nutrition is vital for that mission.” By making meals free, many students who normally wouldn’t participate do, and the district remains focused on providing quality meals.

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## FRAC Resources

- USDA CEP Characteristics Study: <https://www.fns.usda.gov/cn/usda-cep-characteristics-study-sy-2016-17>
- USDA CEP guidance: <https://fns-prod.azureedge.us/sites/default/files/cn/SP54-2016os.pdf>
- Large School Districts report: [https://frac.org/wp-content/uploads/2020-Large-District-Report\\_FNL.pdf](https://frac.org/wp-content/uploads/2020-Large-District-Report_FNL.pdf)
- CEP report: <https://frac.org/wp-content/uploads/making-cep-work-with-lower-isps.pdf>
- FRAC CEP Toolkit: <https://fraccep.org/>