

Community Eligibility: The Key to Hunger-Free Schools
School Year 2023–2024

DECEMBER 2024 | WWW.FRAC.ORG

## **Community Eligibility: The Key to Hunger-Free Schools**

School Year 2023-2024

DECEMBER 2024

#### **Acknowledgments**

The Food Research & Action Center (FRAC) gratefully acknowledges the dedicated support of its work to expand and improve the school meals programs from the following:

- ▶ Annie E. Casey Foundation
- ▶ The From Now On Fund of the Tides Foundation
- ▶ General Mills, Inc.
- ▶ Kaiser Permanente National Community Benefit Fund at The East Bay Community Foundation
- ▶ Kellanova
- ▶ Newman's Own Foundation

This report was written by Erin Kennedy Hysom and Crystal FitzSimons of the Food Research & Action Center (FRAC). The findings and conclusions presented in this report are those of FRAC alone.

**For research citation:** Hysom, E.K., & FitzSimons, C. (2024). *Community Eligibility: The Key to Hunger-Free Schools* — *School Year 2023*—2024. Food Research & Action Center. https://frac.org/wp-content/uploads/CEP-Report-2024.pdf

Photo credit: FRAC is grateful to Fulton County Schools for the photo used in this report.

#### **About FRAC**

The Food Research & Action Center improves the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and by advancing bold and equitable policy solutions. For more information about FRAC, or to sign up for FRAC's e-newsletters, go to www.frac.org.





# Community Eligibility Participation 2023–2024



7,717

school districts had one or more schools adopting CEP, an increase of **1,298** school districts, or **20.2 percent**, from the 2022–2023 school year.



47,766

schools adopted CEP, an increase of **7,531** schools, or **18.7 percent**, from the previous school year.





children attended a CEP school, an increase o nearly **3.8 million** children, or **18.9 percent**, from the previous school year.

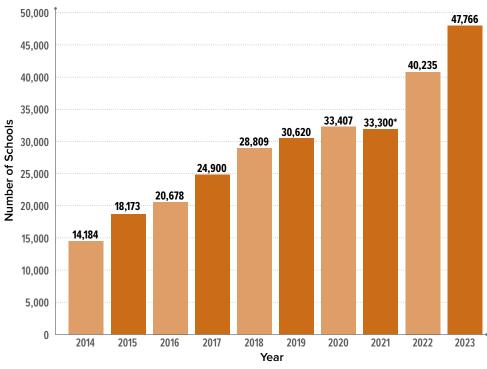
## Executive Summary

The pandemic-related waivers available beginning in the spring of 2020 through the 2021–2022 school year that allowed schools to offer school meals at no charge to all students revealed the power that free school meals can have on the health and well-being of children and families, while streamlining food service operations for schools. Since the loss of those waivers, more eligible schools and school districts have embraced the Community Eligibility Provision (CEP), which allows highneed schools to offer school breakfast and lunch to all students at no charge.

CEP was established in the Healthy, Hunger-Free Kids Act of 2010, and became available nationwide in the 2014–2015 school year. CEP adoption grew year after year, with one in three schools offering meals to all students at no charge through CEP prior to the pandemic. In the 2023–2024 school year, participation grew even more dramatically with one out of every two schools implementing CEP.

CEP has been associated with numerous benefits for both students and schools since it became available nationwide a decade ago. Research associates CEP with improvements in student health and education, such as modest reductions in childhood obesity, better attendance, reductions in school suspension rates, and improved educational outcomes, particularly in math. 12.3,4.5 Furthermore,

**GRAPH 1:** Ten-Year Trend in Schools Participating in CEP



\* The number of students enrolled in CEP schools in 2021 increased even though there was a slight decrease in schools adopting CEP. This was driven by school consolidations in New York City.

offering all students meals at no charge alters the perception that school meals are only for "children from low-income households," thus, eliminating the stigma sometimes present with school meal participation. CEP increases participation in school meals, which strengthens the financial stability of schools' food service operations, while allowing more students to experience the many benefits linked to school meals participation. CEP schools are also not required to collect or process school meal applications, thus, reducing administrative costs and

staff workloads, and allowing school nutrition professionals to focus on meal quality and student engagement and wellness. Furthermore, CEP eliminates school meal debt by offering all students healthy meals at no charge.

For the second year in a row, the number of school districts and schools implementing CEP proliferated:

 7,717 school districts had one or more schools adopting CEP, an increase of 1,298 school districts, or 20.2 percent, from the 2022– 2023 school year.

#### **EXECUTIVE SUMMARY CONTINUED**



- ▶ 74.3 percent of eligible school districts adopted CEP.
- ▶ 47,766 schools adopted CEP, an increase of 7,531 schools, or 18.7 percent, from the previous school year.
- ▶ 84.7 percent of eligible schools adopted CEP.
- ▶ 23.6 million children attended a CEP school, an increase of nearly 3.8 million children, or 18.9 percent, from the previous school year.

In October 2023, the U.S. Department of Agriculture (USDA) expanded CEP eligibility by reducing the participation threshold from 40 percent "identified students" — children who are eligible for free school meals and already identified by means other than an individual household application — to 25 percent. As more schools become eligible, focused efforts must be made to ensure that eligible schools have the financial support, technical assistance, and resources needed to successfully implement CEP.

Ongoing challenges related to low direct certification rates, coupled with an inadequate multiplier (which together determines the federal reimbursement rates for CEP schools), prohibits many eligible schools from participating. Ensuring that eligible schools and districts can fully implement CEP is a key step towards Healthy School Meals for All — the vital education and public health initiative to offer a free school breakfast and lunch to all students. regardless of their household income, which would raise nutrition equity and support children's academic achievement. Collaborative leadership at local, state, and federal levels, including targeted technical assistance and federal legislation that increases the financial viability of CEP, would ensure that all students have equitable access to healthy school meals and the benefits they bestow on children's health and learning.





#### About This Report

This report analyzes community eligibility adoption — nationally and for each state and the District of Columbia — in the 2023–2024 school year, and is based on four measures:

- 1. the number of eligible and adopting schools and school districts;
- 2. the share of eligible schools and districts that have adopted CEP;
- 3. the number and share of eligible schools that have adopted, based on the school's poverty level; and
- **4.** the number of students attending a school that participates in CEP.

As a companion to this report, FRAC has compiled all data collected in an <u>online database of eligible and adopting schools</u> that can be searched by state and school district.





CEP schools are high-need schools that offer breakfast and lunch at no charge to all students. Instead of collecting school meal applications, CEP schools are reimbursed for a percentage of the meals served, using a formula based on the identified student percentage (ISP) — the percentage of students who are directly certified for free school meals without an application due to participation in another means-tested program (for example, students whose households participate in the Supplemental Nutrition Assistance Program (SNAP)). Participating schools are required to use non-federal funds to offset any additional costs, over and above federal reimbursements, of serving free meals to all students.

CFP benefits both schools and families:

- ▶ Schools no longer collect, process, or verify school meals applications, saving significant time and reducing administrative burdens.
- ▶ Schools do not need to track each meal served by fee category (free, reduced-price, paid), and instead report total meal counts.
- ▶ School nutrition staff do not need to collect fees from students who are eligible for reduced-price or paid school meals, allowing students to move through cafeteria lines faster, and ensuring that more children can be served
- Offering meals at no charge to all students increases participation because it eliminates any perception that the school meals programs are just for children from households with low incomes.
- ▶ Schools no longer struggle with school meal debt for reduced-price and paid students, and they do not have to follow up with families to collect unpaid school meal fees.

#### **How Schools Can Participate**

In October 2023, USDA reduced the CEP eligibility threshold so that any school, group of schools in a district, or district with 25 percent or more "identified students" was eligible to participate if the state agency administering the child nutrition programs applied for a waiver allowing midyear adoption. Twenty-eight states applied for this waiver allowing schools to elect CEP at 25 percent identified students after the start of the 2023–2024 school year. CEP eligibility in the remaining states remained at the prior level of 40 percent identified students. Starting in the 2024–2025 school year, the CEP eligibility threshold is 25 percent identified students nationwide.

Identified students are comprised of students directly certified for free school meals without an application. This includes:

▶ children directly certified for free school meals through data matching because their households

receive SNAP, Temporary Assistance for Needy Families, or Food Distribution Program on Indian Reservations benefits, and in most states, Medicaid benefits (combined with an income test); and

children who are certified for free school meals without an application because they are unhoused, migrant, runaway, enrolled in Head Start, or in foster care.

Identified students are a subset of those eligible

for free and reduced-price school meals. This is a smaller group than the total number of children who would be certified to receive free or reduced-price school meals if school meal applications were collected. For that reason, a multiplier is applied to the ISP.

#### **How Schools Are Reimbursed**

Although all meals are offered at no charge to all students in CEP schools, federal reimbursements are based on the school's proportion of children from households with low incomes. The ISP is multiplied by 1.6 to calculate the percentage of meals reimbursed at the federal free rate, and the remainder of meals served are reimbursed at the lower, federal paid rate. For example, a school with 50 percent identified students would be reimbursed for 80 percent of the meals served at the free reimbursement rate (50 x 1.6 = 80), and 20 percent at the paid rate.





#### **(EY FINDINGS FOR THE 2023–2024 SCHOOL YEAR**



100.0%

100.0%

99.5%

#### **School District Adoption**

Nationally, 7,717 school districts — 74.3 percent of those eligible — adopted CEP in one or more schools in the 2023–2024 school year.<sup>7</sup> And 1,298 additional school districts — 20.2 percent — implemented CEP compared to the prior school year. This increase is likely driven by state legislation supporting CEP and Healthy School Meals for All, as well as the seven new states that began directly certifying students with Medicaid data in the 2022–2023 school year.<sup>8,9</sup>

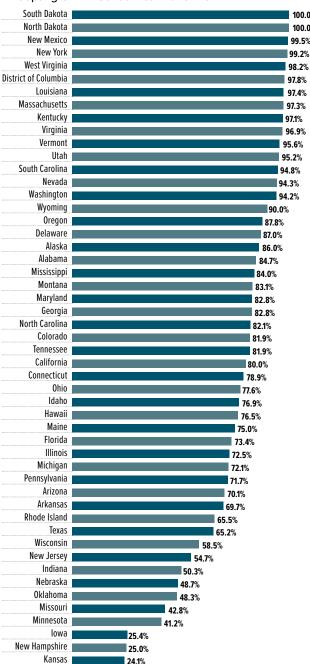
The median state's take-up rate in school year 2023–2024 for eligible school districts was 81.9 percent; however, school district take-up rates across the states varied significantly, from 24.1 percent in Kansas to over 95 percent in the District of Columbia, Kentucky, Louisiana, Massachusetts, New Mexico, New York, North Dakota, South Dakota, Utah, Vermont, Virginia, and West Virginia.

Forty-one states and the District of Columbia increased the number of school districts adopting CEP in the 2023–2024 school year. New York experienced the largest growth in the number of districts adopting, with 326 additional school districts — 63.9 percent more school districts — participating in CEP in the 2023–2024 school year compared to the 2022–2023 school year. This increase can be attributed to New York legislation that subsidizes the difference between the free and paid federal reimbursement rates so that all meals served in CEP schools are reimbursed at the federal free rate. Kansas had the largest percentage increase, going from seven districts implementing CEP in 2022-2023 to 34 districts implementing in 2023–2024, a growth of 385.7 percent. Colorado and Alabama followed in largest percentage increases of school district implementing CEP by 172 percent and 92.4 percent, respectively. Kansas and Alabama's

growth in district adoption can be attributed to their implementation of Medicaid Direct Certification in the 2022–2023 school year, which increased the number of school districts that were eligible for CEP, as well as increased schools' ISP, making CEP more financially feasible for many schools. It should be noted that while Kansas' growth is impressive, only 24.1 percent of eligible school districts were implementing CEP in the 2023–2024 school year. Colorado's increase is due to the state's Healthy School Meals for All legislation, which required schools to maximize federal reimbursements, often through CEP.

Only four states — Arkansas, Missouri, Montana, and Ohio — decreased the number of school districts implementing CEP in the 2023–2024 school year. Three of these states — Arkansas, Montana, and Ohio — also had decreases in the number of eligible school districts. Ohio had the largest decrease in participating school districts — 26 fewer school districts or 6.8 percent — resulting in the percentage of eligible districts adopting CEP decreasing from 81.7 percent to 77.6 percent. Missouri experienced a 4 percent drop in the number of eligible school districts adopting CEP, going from 99 districts participating in the 2022-2023 school year to 95 districts participating in the 2023–2024 school year. Montana experienced a 3.6 percent decrease in participating districts, going from 56 participating districts in the 2022–2023 school year to 54 districts in the 2023–2024 school year. Arkansas experienced a 1.4 percent drop in school district participation from 2022-2023 to 2023-2024, losing one school district between the two years. Five states — Hawaii, Idaho, North Dakota, South Dakota, and West Virginia — maintained the same level of school district adoption from the 2022-2023 school year to the 2023–2024 school year.

**GRAPH 2:** Percentage of Eligible School Districts Adopting CEP in School Year 2023-2024





#### **School Adoption**

In the 2023–2024 school year, 47,766 schools adopted CEP, including schools from all 50 states and the District of Columbia. Overall, school adoption of CEP increased by 7,531 schools — 18.7 percent — from the prior school year. In the 2023–2024 school year, 84.7 percent of all eligible schools adopted CEP nationally, with a median state take-up rate of 87.4 percent.

Among the states, the percentage of eligible and adopting schools varied significantly. Fourteen states — Kentucky, Louisiana, Massachusetts, Nevada, New Mexico, New York, North Dakota, Oregon, South Dakota, Vermont, Virginia, Washington, West Virginia, and Wyoming — had 95 percent or more of their eligible schools adopting CEP. Sixteen states and the District of Columbia had between 85 to 95 percent of their eligible schools adopting CEP. Alternatively, Kansas and New Hampshire had less than 40 percent of their eligible schools adopting CEP: 28.7 percent and 19 percent, respectively.

Forty-four states and the District of Columbia increased the number of schools adopting CEP. New York had the largest increase in the number of schools adopting CEP — 1,149 more schools or a 37.7 percent increase — likely due to their state having passed state-supported CEP legislation in 2023. Michigan, North Carolina, and Colorado added 753, 651, and 482 schools, respectively. Colorado had the largest percent increase in school adoption — 454.7 percent — likely due to their Healthy School Meals for All legislation that encourages eligible schools to adopt CEP to receive state subsidies.

Two states — Hawaii and South Dakota — maintained the same number of CEP schools during the 2023–2024 school year as in the previous school year. Four states — Arkansas, Idaho, Montana, and Ohio — experienced a decrease in the number

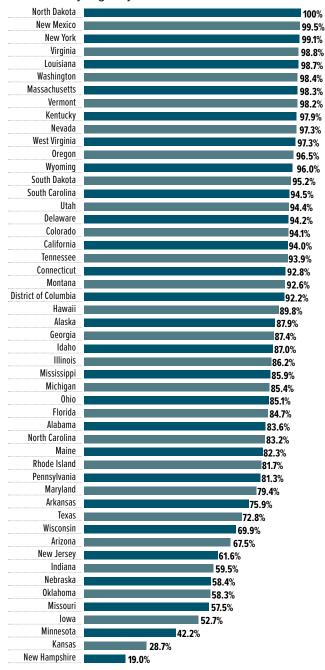
of schools participating in CEP. All four states also experienced a corresponding decrease in the number of schools that were eligible to participate in CEP. The largest participation decrease was in Ohio where 31 fewer schools were eligible and 59 fewer schools participated in 2023–2024 than in the previous school year.

### INCREASE THE MULTIPLIER TO INCREASE CEP IMPLEMENTATION

In September 2023, USDA released a final CEP rule that lowered the CEP participation threshold from 40 percent "identified students" to 25 percent "identified students". Twenty-eight states applied for a waiver allowing newly eligible schools to implement CEP midyear; however, midyear adoption rates amongst newly eligible schools varied significantly in these waiver states. States with CEP or Healthy School Meals for All subsidies experienced the greatest level of midvear adoption amongst newly eligible CEP schools, whereas states without subsidies experienced few or no newly eligible schools adopting midvear. The lower threshold became available nationwide in the 2024–2025 school year; however, many newly eligible schools may struggle to implement CEP at this lower threshold without additional financial assistance, such as an increase to the multiplier that determines the level of federal reimbursement that CEP schools receive. USDA does not have the authority to increase funding for CEP; that power lies with Congress.

In order to ensure that all eligible schools are able to successfully implement CEP, Congress must increase the multiplier from 1.6 to 2.5, as proposed in the School Hunger Elimination Act (S. 4525) and the School Meals Expansion Act (H.R. 2567).

**GRAPH 3:** Percentage of Eligible Schools Adopting Community Eligibility in School Year 2023–2024



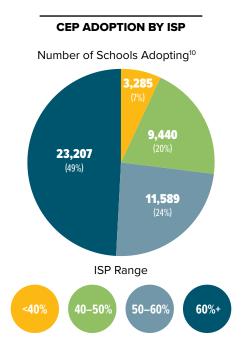


#### **School Adoption by Poverty Level**

Due to CEP's reimbursement structure, participating schools with higher ISPs are better able to implement CEP while maintaining financial viability. Schools with ISPs greater than 62.5 percent receive the federal free reimbursement rate — the highest per meal rate — for all the meals served. Any school, group of schools, or school district with less than 62.5 percent ISP, is reimbursed at the federal free and federal paid rate — the lowest per meal rate. As a result, schools with higher ISPs are more likely to participate in CEP; however, more and more schools are adopting CEP at lower ISPs.

Since the 2014–2015 school year, the number of schools participating with an ISP between 40 percent and 50 percent has more than quintupled, and the number of schools participating with an ISP between 50 percent and 60 percent has more than quadrupled, as schools become more familiar with the positive impact of community eligibility on school nutrition finances, and on children, families, and the school environment.

In the 2023–2024 school year, of the 47,766 schools adopting CEP, 23,207 schools, 48.6 percent, had ISPs of 60 percent or higher. Of adopting schools with lower ISPs, 11,589 schools, or 24.3 percent, had ISPs between 50 and 60 percent; 9,440 schools, or 19.8 percent, had ISPs between 40 and 50 percent; and 3,285 schools, or 6.9 percent, had ISPs below 40 percent. In the 2023–2024 school year, 91.4 percent of schools with ISPs above 60 percent adopted CEP, whereas 84.8 percent of schools with ISPs between 50 percent and 60 percent implemented CEP last year. Among schools with ISPs between 40 percent and 50 percent, the national average adoption rate for eligible schools was 68.4 percent, with a median of 80 percent.



Among states, the percentage of eligible versus adopting schools in the 40 percent to 50 percent ISP group varies significantly. Sixteen states had 90 percent or more eligible low-ISP schools adopting. An additional nine states and the District of Columbia had 80 percent or more of their schools adopting. Alternatively, nine states had less than 30 percent of their eligible low-ISP schools adopting, including New Hampshire, which had only 7.7 percent of eligible low-ISP schools adopting. Of the 16 states that have over 90 percent of low-ISP schools participating, nine have either CEP or Healthy School Meals for All policies that provide state subsidies to assist schools efforts to offer nutritious meals to all students, while five other states in this range provide additional state funding for school meals or operations, such as state support for breakfast-afterthe-bell initiatives.

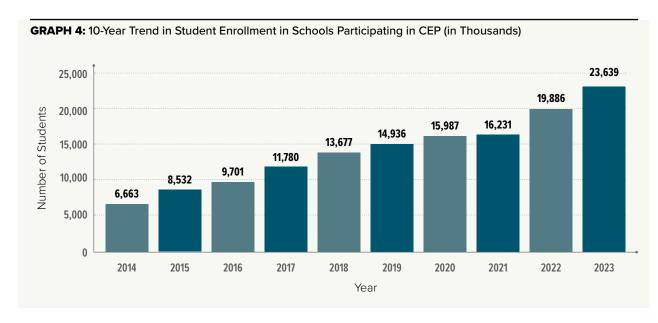
#### Student Enrollment

In the 2023–2024 school year, over 23.6 million students attended CEP schools; this is up from 19.9 million in the 2022–2023 school year. California and Texas had the most children attending CEP schools, with approximately 3.6 million and 2.6 million in each state, respectively.

Forty-five states and the District of Columbia increased the number of students in CEP schools in the 2023–2024 school year. New York and North Carolina experienced the biggest increase in the number of students attending CEP schools, having added 616,758 students and 344,820 students, respectively. South Carolina, Florida, and Michigan had significant increases relative to other states as well, adding 329,254 students, 324,468 students, and 315,564 students, respectively.

Five states saw decreases in the number of students attending CEP schools in the 2023-2024 school year. Two states — Ohio and Arkansas — saw decreases of more than 1,000 students, with Ohio reporting a decrease of more than 15,000 students. As previously noted, Ohio had a 5.2 percent decrease in the number of schools participating in CEP in 2023–2024. Two states — Rhode Island and South Dakota — had a decrease in students but increased or maintained the same number of schools participating from the prior school year. For example, South Dakota saw a decrease of 129 students while maintaining the same number of schools implementing CEP from the 2022-2023 school year to the 2023–2024 school year. Overall, South Dakota experienced a decrease in public school enrollment from the 2022–2023 school year to the 2023–2024 school year, reporting 424 fewer students enrolled in prekindergarten through twelfth grade in October 2023 compared to October 2022.12





Rhode Island saw a decrease of 142 students, yet CEP adoption increased by eight schools. The decrease in Rhode Island's enrollment may be attributed to decreases in CEP schools' enrollment from the 2022–2023 school year to the 2023–2024 school year. Of the 57 Rhode Island schools that operated CEP in both school years, 35 reported a lower enrollment in 2023–2024 than in 2022–2023. Conversely, Idaho had one less school participate in the 2023–2024 school year compared to the 2022–2023 school year; however, their reported student enrollment in CEP schools increased by 4,584 students. This may be due to higher enrollments reported in the 2023–2024 school year for 15 returning Idaho schools.

#### **Medicaid Direct Certification**

Direct certification has transformed the process of linking eligible children to free school meals by easing application burdens on households and streamlining administrative processes for schools. The Medicaid Direct Certification demonstration project was first authorized through the Healthy. Hunger-Free Kids Act of 2010 to allow students who are enrolled in Medicaid and whose household income falls below the specified federal poverty thresholds to automatically receive free or reduced-price school meals without having to submit a meal benefit application. Directly certifying students for free or reduced-price school meals, as opposed to determining eligibility via an application, better links eligible children to school meal benefits, eases paperwork burdens on families and schools, positively impacts program integrity, and increases the financial viability of CEP by increasing a school's ISP.

Twenty-six states implemented Medicaid Direct Certification in the 2022–2023 school year, including seven states for which Medicaid Direct Certification was brand new — Alabama, Kansas, Louisiana, Maryland, Minnesota, North Carolina, and South Carolina. Given the CEP regulatory timelines for eligibility and adoption, initiating Medicaid Direct Certification in the 2022–2023 school year directly impacted schools' ability to implement CEP in the 2023–2024 school year (the following school year). All seven states experienced significant increases in the number of schools adopting CEP in the 2023–2024 school year (the school year after they implemented Medicaid Direct Certification).

Twelve additional states — Arizona, Colorado, Delaware, Georgia, Montana, New Mexico, Ohio, Oklahoma, Oregon, Tennessee, Vermont, and Wyoming — began implementing Medicaid Direct Certification in the 2023–2024 school year, and five new states — Idaho, Maine, New Jersey, North Dakota, and Rhode Island — began Medicaid Direct Certification in the 2024–2025 school year, bringing the total number of participating states to 43.

USDA is currently accepting applications to implement Medicaid Direct Certification in the 2025-2026 school year. This generous timeline provides states with a sufficient planning period to establish data-sharing agreements between agencies, update technological systems, and provide technical assistance to school districts. The remaining seven states — Alaska, Arkansas, Hawaii, Mississippi, Missouri, New Hampshire, and South Dakota as well as the District of Columbia, are strongly encouraged to apply to implement Medicaid Direct Certification to support better access to school meals, to reduce the administrative burden on schools and families, and so that a greater number of children can benefit from community eligibility. Learn more by reading USDA's Request for Proposals.



## **Expanding Access to Community Eligibility**

As previously mentioned, USDA reduced CEP's participation threshold from 40 percent to 25 percent, thus greatly increasing the number of schools that will be eligible to participate in the 2025–2026 school year; however, many newly eligible schools are unable to participate without additional funding due to the inadequate multiplier that determines the level of federal reimbursement that CEP schools receive. CEP adoption rates continue to be highest among schools with an ISP greater than 50 percent, with schools below this threshold reporting difficulties maintaining financial solvency. To make CEP a more financially viable option for high-need schools, Congress must increase the multiplier from 1.6 to 2.5.

Efforts are underway in both the House and the Senate to strengthen and expand CEP. The School Hunger Elimination Act (S. 4525) would increase federal funding for CEP schools by increasing the multiplier from 1.6 to 2.5, while strengthening CEP through additional policy changes, such as creating a statewide grouping option, expanding direct certification to include children receiving Social Security income and mandating Medicaid Direct Certification, and providing retroactive reimbursement for meals served to children who are certified for free or reduced-price school meals later in the school year. The Nutrition Red Tape Reduction Act (S. 4523) would permanently lower the threshold for schools to participate in CEP to 25 percent so that future regulations did not increase participation requirements. In the House, the School Meals Expansion Act (H.R. 2567) would increase federal funding for CEP schools and permanently lower the threshold for schools to participate to 25 percent ISP. The No Hungry Kids in School Act (H.R. 3112) would create a statewide grouping option, while the Expanding Access to School Meals Act (H.R. 3113) would increase eligibility for free meals to 200 percent, expand direct certification, make eligibility retroactive to the beginning of the school year, and increase funding for CEP schools.

#### **Healthy School Meals for All**

CEP is an important pathway to Healthy School Meals for All nationwide. The pandemic-era waivers that allowed all schools to serve all students school meals at no cost revealed what is possible when we dismantle administrative barriers and increase equitable access to nutritious school meals — food service operations are streamlined, school meals participation increases, and children have access to the nutrition they need to learn and thrive. Eight states — California, Colorado, Massachusetts, Maine, Michigan, Minnesota, New Mexico, and Vermont — have implemented Healthy School Meals for All policies. Nevada extended their Healthy School Meals for All policy through the 2023–2024 school year, while New York, Oregon, and Washington have provided additional funding to support CEP schools. Collectively, these 12 states contributed 47 percent of the new schools that adopted CEP in the 2023-2024 school year.

Every child in every state should have access to healthy school meals, regardless of household income. The <u>Universal School Meals Program Act</u> (S. 1568, H.R. 3204) would do just that —make Healthy School Meals for All a reality nationwide. Offering school meals to all students at no cost is a vital and necessary public health investment, is critical to supporting positive educational outcomes, and is instrumental in advancing racial equity by helping to ensure that all students have the nutritional foundation they need. Learn more at FRAC's website on Healthy School Meals for All, www.FreeSchoolMealsforAll.org.

#### **Conclusion**

The Community Eligibility Provision has revolutionized children's access to healthy school meals. By eliminating stigma for students, reducing barriers of cost and paperwork for families, and streamlining food service operations, CEP creates hunger-free schools where all children have access to the nutrition they need to learn. CEP supports students' academic achievement and healthy development, and is just as vital to students' success as textbooks and transportation.

To maximize CEP's impact, school districts and state agencies must leverage the power of technology and data-sharing platforms to ensure that robust direct certification systems identify all eligible children. All states must implement direct certification with the Medicaid Demonstration Project to decrease application burdens on families and increase the financial feasibility of schools implementing CEP. And all child nutrition partners, from USDA to state agencies, from school districts to anti-hunger advocates, must work collectively to assist families and schools in their efforts to offer all children healthy school meals.

Every child, in every state, should have access to the nutrition they need to succeed. Congress has the ability to make Healthy School Meals for All a reality nationwide, and CEP offers an important step toward achieving that goal.

### ADDITIONAL RESOURCES

- School District Strategies for Improving <u>Direct Certification</u>
- Community Eligibility: Making It Work With Lower ISPs
- ▶ Community Eligibility Partial Implementation Guide

For more information and additional resources to help determine if CEP is a possibility for your school district, go to FRAC's Community Eligibility webpage.



## Technical Notes

The Food Research & Action Center (FRAC) obtained information on schools that were approved to operate the Community Eligibility Provision (CEP) in the 2023–2024 school year from state agencies that administer the federal school nutrition programs. Between September 2023 and March 2024, FRAC collected these data:

- ▶ school name
- school district name
- ▶ identified student percentage
- participation in community eligibility as an individual school, part of a group, or a whole district
- ▶ enrollment

FRAC followed up with state agencies for data clarifications, and when necessary, to obtain missing data to the maximum extent practical. Additionally, FRAC shared the final data tables with state agencies for review before publication.

Under federal law, states are required to publish, by May 1 of each year, a list of CEP-eligible and neareligible schools and districts. When the 2023-2024 school year began, CEP-eligible schools and school districts were ones with identified student percentages (ISPs) of at least 40 percent, and neareligible schools and school districts were those with ISPs between 30 percent and just under 40 percent. In October 2023, the U.S. Department of Agriculture (USDA) expanded CEP eligibility to schools and school districts with an ISP of at least 25 percent and classified near-eligible schools and school districts as those with ISPs between 15 percent and just under 25 percent. Furthermore, USDA granted states the ability to waive the June 30, 2023, election deadline and allow schools to adopt CEP at the

new, lower thresholds until March 31, 2024. Twentyeight states applied for a waiver allowing midyear adoption, although not every state had schools elect to participate in CEP midvear.

To examine CEP participation against eligibility, FRAC compared states' May 2023 eligibility lists to the participation files provided by the state agency upon request. In determining district eligibility, FRAC treated a district as eligible if it contained at least one eligible school. FRAC treated a school as eligible if it appeared on a state's published eligibility list above the 40 percent threshold. Schools that were missing from a state's eligibility list, but appeared on its participation list were treated as eligible. Additionally, given the varying allowance for midyear adoption at the 25 percent threshold, only schools that participated below 40 percent ISP were counted toward eligibility. Non-participating schools with ISPs lower than 40 percent were not counted toward eligibility.

FRAC gave states the option to report both eligible and adopting schools in the CEP participation data collection. This gave states the opportunity to update their eligible schools list to reflect any school closures or consolidations. Fifteen states — Alabama, Connecticut, Delaware, Louisiana, Montana, Nebraska, Nevada, New Hampshire, New Mexico, North Carolina, Ohio, Oregon, Texas, Virginia, and West Virginia — provided both eligible and adopting schools for this analysis.

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:

1. USDA permitted states to base their May 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, more recent, or both, when applying to adopt CEP.
- 2. A school can participate as a member of an adopting group (part or all of a district). A group's eligibility is based on the ISP for the group as a whole.

The 2023–2024 CEP participation data reflects the point in time when the data was received from the state agency and may differ slightly from other participation data sources. As previously mentioned, 28 states applied for a USDA waiver allowing midyear CEP adoption at the lower 25 percent threshold — Alabama, Arizona, Colorado, Connecticut, Delaware, Hawaii, Idaho, Kansas, Kentucky, Massachusetts, Maryland, Michigan, Minnesota, Missouri, North Carolina, Nebraska, New Hampshire, New Mexico, New York, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Wyoming, and West Virginia. States had the authority to determine their own application deadlines if they did not surpass the federal deadline of March 31, 2024. While individual states' application deadlines are unknown, it is possible that some states continued to allow schools and school districts to adopt CEP after they submitted participation data to FRAC, resulting in some participating schools not being captured in this report.

The participation data requested from state agencies included whether schools have elected to adopt community eligibility, the ISP the schools use to determine the federal reimbursement for meals served, and the total number of students attending each adopting school. The ISP schools use to determine the federal reimbursement

#### **TECHNICAL NOTES CONTINUED**



for meals served, sometimes called the group or claiming ISP, is reported for participating schools, while the individual or proxy ISP is reported for non-participating schools. Eight states — California, Georgia, Iowa, Maryland, Mississippi, Tennessee, Vermont, and Washington — provided individual schools' ISP for participating schools. Therefore, these states may have schools indicated in ISP categories that do not accurately reflect the ISP used to determine federal reimbursements. Similarly, participation data for Illinois was pulled from their May 2024 CEP eligibility list and reports individual schools' ISP rather than the ISP used to determine federal reimbursements. California reported 61 participating schools without an ISP; Colorado reported two participating schools without an ISP; Illinois reported one participating school without an ISP; and Louisiana reported 181 participating schools without an ISP. These schools were excluded from "Table 3: Community Eligibility (CEP) Take-Up Rate by Schools' Identified Student Percentage (ISP) for School Year 2023–2024." Therefore, the total number of participating schools indicated in each ISP category in Table 3 for California, Colorado, Illinois, and Louisiana, is less than the total number of schools adopting CEP in each respective state.

Some states reported schools' free-claiming percentages (ISP multiplied by 1.6) rather than the ISP. The reverse calculation (free-claiming percentage divided by 1.6) was completed to determine the appropriate ISP category for these schools. While it is impossible to know the exact grouped ISP, it can be determined that the school is participating in CEP with an ISP of at least 62.5 percent.

The following states had schools that did not provide student enrollment numbers:

- ▶ 6 schools in Alabama
- ▶ 1 school in Alaska
- ▶ 2 schools in Arkansas
- ▶ 10 schools in California
- ▶ 4 schools in Colorado
- ▶ 2 schools in Delaware
- ▶ 1 school in Illinois
- ▶ 188 schools in Louisiana
- ▶ 1 school in Massachusetts
- ▶ 2 schools in Maryland
- ▶ 1 school in Michigan
- ▶ 1 school in Missouri
- ▶ 32 schools in New Mexico
- ▶ 7 schools in Oregon

- ▶ 1 school in Pennsylvania
- ◆ 4 schools in South Carolina
- ▶ 34 schools in Texas
- ▶ 13 schools in Vermont
- 2 schools in Virginia

Tennessee did not provide enrollment data in their CEP participation file; however, FRAC was able to identify enrollment from the May 2023 eligibility list for 823 schools, leaving 63 schools without any reported enrollment. Oklahoma reported multiple enrollment figures for over 500 schools. FRAC used the lowest reported enrollment when calculating Oklahoma's total student enrollment in Table 4.

Rhode Island provided updated data for the 2022-2023 school year, which increased the number of eligible school districts by one district and increased the number of eligible schools by six schools. Rhode Island's CEP participation data for the 2022–2023 school year remained the same as previously reported. Likewise, Idaho provided updated data for the 2022–2023 school year, which decreased the number of eligible school districts by 15 districts and increased the number of eligible schools by eight schools. Idaho's CEP participation data for the 2022–2023 school year remained the same as previously reported.



#### **Endnotes**

- 1 Localio AM, Knox MA, Basu A, Lindman T, Walkinshaw LP, Jones-Smith JC. Universal Free School Meals Policy and Childhood Obesity. Pediatrics. 2024 Apr 1;153(4):e2023063749. doi: 10.1542/peds.2023-063749. PMID: 38495019; PMCID: PMC10979297.
- 2 Domina, T., Clark, L., Radsky, V., & Bhaskar, R. (2024). There Is Such a Thing as a Free Lunch: School Meals, Stigma, and Student Discipline. American Educational Research Journal, 61(2), 287-327. https://doi.org/10.3102/00028312231222266
- 3 Bartfeld JS, Berger L, Men F. Universal Access to Free School Meals through the Community Eligibility Provision Is Associated with Better Attendance for Low-Income Elementary School Students in Wisconsin. J Acad Nutr Diet. 2020 Feb;120(2):210-218. doi: 10.1016/j.jand.2019.07.022. Epub 2019 Oct 14. PMID: 31624028.
- 4 Gordanier, J., Ozturk, O., Williams, B., & Zhan, C. (2020). Free Lunch for All! The Effect of the Community Eligibility Provision on Academic Outcomes. Economics of Education Review, 77, 101999-. https://doi.org/10.1016/j.econedurev.2020.101999
- 5 Ruffini, K. (2022). Universal Access to Free School Meals and Student Achievement: Evidence from the Community Eligibility Provision. The Journal of Human Resources, 57(3), 776-820. https://doi.org/10.3368/jhr.57.3.0518-9509R3
- 6 In October 2023, the U.S. Department of Agriculture (USDA) issued a Final Rule which expanded CEP eligibility by reducing the participation threshold from 40 percent "identified students" — children who are eliqible for free school meals and already identified by means other than an individual household application — to 25 percent. Twenty-eight states adopted the new threshold after the start of the 2023–2024 school year: Alabama, Arizona, Colorado, Connecticut, Delaware, Hawaii, Idaho, Kansas, Kentucky, Massachusetts, Maryland, Michigan, Minnesota, Missouri, North Carolina, Nebraska, New Hampshire, New Mexico, New York, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Wyoming, and West Virginia. While these 28 states allowed for midyear community eligibility adoption amongst newly eligible schools, not every state saw schools electing to implement CEP at the lower threshold last year. The 25 percent participation threshold became available nationwide for the 2024–2025 school year.

- 7 Under federal law, states are required to publish annually a list of school districts that are eligible for the Community Eligibility Provision districtwide, as well as a list of individual schools that are eligible, by May 1. For more information on Community Eligibility's public notification requirements, see https://www.ecfr.gov/ current/title-7/subtitle-B/chapter-II/subchapter-A/part-245#p-245.9(f)(7)
- 8 Four additional states Colorado, Michigan, Minnesota, and New Mexico passed Healthy School Meals for All legislation for the 2023–2024 school year that required eligible schools to adopt the Community Eligibility Provision to receive state subsidies. Similarly, New York passed legislation providing state subsidies for schools implementing community eligibility, joining Oregon and Washington state.
- 9 Alabama, Kansas, Louisiana, Maryland, Minnesota, North Carolina, and South Carolina began certifying students as eligible for free and reduced-price school meals using Medicaid data in the 2022–2023 school year. Illinois expanded their initial demonstration project to include additional locations and/or expand from free meals only to free and reduced-price meals in the 2022-2023 school year as well. More information on the Direct Certification with Medicaid Demonstration Projects can be found at https://www.fns.usda.gov/cn/direct-certificationmedicaid-demonstration-project
- 10 Two hundred and forty-five schools did not report ISPs and therefore were not counted in the school adoption by poverty level analysis.
- 11 This past school year, 3,285 schools with ISPs below 40 percent implemented CEP; however, given that this option was not available nationwide, participation at this threshold was not measured against eligibility in this report.
- 12 South Dakota Department of Education. Student Enrollment Data. Accessed on October 25, 2024. https://doe.sd.gov/ofm/enrollment.aspx
- 13 Illinois expanded their initial demonstration project from free meals only to free and reduced-price meals in 2022-2023.

Table 1: Community Provision (CEP) Take-Up Rate in School Districts for School Years 2022–2023 and 2023–2024

		School Year 2022–2023		School Year 2023–2024				
State	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP <sup>1</sup>	Adopting CEP	Percentage Adopting CEP of Total Eligible		
Alabama	131	66	50.4%	150	127	84.7%		
Alaska	41	34	82.9%	43	37	86%		
Arizona	271	187	69%	271	190	70.1%		
Arkansas	121	70	57.9%	99	69	69.7%		
California	763	605	79.3%	791	633	80%		
Colorado	71	25	35.2%	83	68	81.9%		
Connecticut	76	59	77.6%	76	60	78.9%		
Delaware	23	17	73.9%	23	20	87%		
District of Columbia	43	42	97.7%	45	44	97.8%		
Florida	325	217	66.8%	350	257	73.4%		
Georgia	140	117	83.6%	145	120	82.8%		
Hawaii	13	13	100%	17	13	76.5%		
Idaho <sup>2</sup>	28	20	71.4%	26	20	76.9%		
Illinois	627	385	61.4%	637	462	72.5%		
Indiana	350	142	40.6%	326	164	50.3%		
lowa	124	25	20.2%	134	34	25.4%		
Kansas	32	7	21.9%	141	34	24.1%		
Kentucky	173	167	96.5%	175	170	97.1%		
Louisiana	138	125	90.6%	155	151	97.4%		
Maine	38	25	65.8%	36	27	75%		
Maryland	28	17	60.7%	29	24	82.8%		
Massachusetts	180	137	76.1%	221	215	97.3%		
Michigan	739	416	56.3%	773	557	72.1%		
Minnesota	136	75	55.1%	337	139	41.2%		
Mississippi	97	75	77.3%	119	100	84%		
Missouri	160	99	61.9%	222	95	42.8%		
Montana	87	56	64.4%	65	54	83.1%		
Nebraska	71	26	36.6%	76	37	48.7%		
Nevada	28	26	92.9%	35	33	94.3%		
New Hampshire	10	2	20%	12	3	25%		
New Jersey	159	80	50.3%	161	88	54.7%		
New Mexico	147	134	91.2%	186	185	99.5%		
New York	647	510	78.8%	843	836	99.2%		
North Carolina	155	111	71.6%	179	147	82.1%		
North Dakota	23	23	100%	23	23	100%		
Ohio	469	383	81.7%	460	357	77.6%		
Oklahoma	262	112	42.7%	236	114	48.3%		
Oregon	127	116	91.3%	139	122	87.8%		
Pennsylvania	561	338	60.2%	562	403	71.7%		
Rhode Island <sup>2</sup>	24	14	58.3%	29	19	65.5%		
South Carolina	79	62	78.5%	96	91	94.8%		
South Dakota	39	32	82.1%	32	32	100%		
Tennessee	130	102	78.5%	127	104	81.9%		
Texas	918	563	61.3%	952	621	65.2%		
Utah	17	15	88.2%	21	20	95.2%		
Vermont	27	24	88.9%	45	43	95.6%		
Virginia	125	120	96%	127	123	96.9%		
Washington	204	201	98.5%	223	210	94.2%		
West Virginia	58	55	94.8%	56	55	98.2%		
Wisconsin	257	140	54.5%	270	158	58.5%		
Wyoming	7	7	100%	10	9	90%		
U.S. Total	9,499	6,419	67.6%	10,389	7,717	74.3%		

<sup>1</sup> For the 2023–2024 school year data, school districts are defined as eligible if they include at least one school with an ISP of 40 percent or higher, or at least one school has already adopted community eligibility.

<sup>2</sup> Rhode Island provided updated data for the 2022-2023 school year, which increased the number of eligible districts by one more than previously reported. Likewise, Idaho provided updated data for the 2022-2023 school year, which decreased the number of eligible school districts by 15 districts. Rhode Island and Idaho's CEP participation data for the 2022-2023 school year remained the same as previously reported.

Table 2: Community Eligibility Provision (CEP) Take-Up Rate in Schools for School Years 2022–2023 and 2023–2024

		School Year 2022–2023			School Year 2023–2024				
State	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP <sup>1</sup>	Adopting CEP	Percentage Adopting CEP of Total Eligible			
Alabama	812	536	66%	1,211	1,013	83.6%			
Alaska	242	211	87.2%	247	217	87.9%			
Arizona	755	508	67.3%	773	522	67.5%			
Arkansas	363	250	68.9%	315	239	75.9%			
California	6,179	6,150	99.5%	6,832	6,425	94%			
Colorado	392	106	27%	625	588	94.1%			
Connecticut	522	483	92.5%	530	492	92.8%			
Delaware	143	127	88.8%	139	131	94.2%			
District of Columbia	181	180	99.4%	205	189	92.2%			
Florida	3,105	2,542	81.9%	3,407	2,887	84.7%			
Georgia	999	873	87.4%	1,021	892	87.4%			
Hawaii	122	106	86.9%	118	106	89.8%			
Idaho <sup>2</sup>	74	61	82.4%	69	60	87%			
Illinois	2,449	2,087	85.2%	2,719	2,344	86.2%			
Indiana	1,148	593	51.7%	1,235	735	59.5%			
lowa	427	221	51.8%	463	244	52.7%			
Kansas	118	34	28.8%	505	145	28.7%			
Kentucky	1,122	1,092	97.3%	1,159	1,135	97.9%			
Louisiana	1,212	1,177	97.1%	1,444	1,425	98.7%			
Maine	84	77	91.7%	96	79	82.3%			
Maryland	434	355	81.8%	820	651	79.4%			
Massachusetts	972	846	87%	1,142	1,123	98.3%			
Michigan	2,378	1,638	68.9%	2,800	2,391	85.4%			
Minnesota	299	160	53.5%	889	375	42.2%			
Mississippi	433	370	85.5%	461	396	85.9%			
Missouri	561	416	74.2%	742	427	57.5%			
Montana	230	167	72.6%	176	163	92.6%			
Nebraska	293	151	51.5%	286	167	58.4%			
Nevada	505	501	99.2%	530	519	97.9%			
New Hampshire	21	3	14.3%	21	4	19%			
New Jersey	568	321	56.5%	593	365	61.6%			
New Mexico	701	667	95.1%	829	825	99.5%			
New York	3,382	3,051	90.2%	4,239	4,200	99.1%			
North Carolina	1,261	974	77.2%	1,954	1,625	83.2%			
North Dakota	38	37	97.4%	38	38	100%			
Ohio	1,302	1,141	87.6%	1,271	1,082	85.1%			
Oklahoma	688	384	55.8%	667	389	58.3%			
Oregon	722	709	98.2%	767	740	96.5%			
Pennsylvania	2,045	1,478	72.3%	2,106	1,712	81.3%			
Rhode Island <sup>2</sup>	94	68	72.3%	93	76	81.7%			
South Carolina	625	546	87.4%	1,021	965	94.5%			
South Dakota	122	100	82%	105	100	95.2%			
Tennessee	958	877	91.5%	944	886	93.9%			
Texas	6,045	4,231	70%	6,375	4,638	72.8%			
Utah	54	50	92.6%	72	68	94.4%			
Vermont	97	92	94.8%	219	215	98.2%			
Virginia	1,106	1,086	98.2%	1,203	1,189	98.8%			
Washington	1,221	1,213	99.3%	1,313	1,292	98.4%			
West Virginia	603	585	97%	623	606	97.3%			
Wisconsin	874	591	67.6%	925	647	69.9%			
Wyoming	13	13	100%	25	24	96%			
U.S. Total	49,094	40,235	82%	56,362	47,766	84.7%			

<sup>1</sup> For the 2023–2024 school year data, schools are defined as eligible if they have an ISP of 40 percent or higher, or if they adopted community eligibility at a lower ISP due to midyear election at the new threshold, grouping, or grace year status.

<sup>2</sup> Rhode Island provided updated data for the 2022-2023 school year, which increased the number of eligible schools by six more than previously reported. Idaho updated their 2022-2023 school year data, which increased the number of eligible schools by eight more than previously reported. Rhode Island and Idaho's CEP participation data for the 2022-2023 school year remained the same as previously reported.

Table 3: Community Eligibility Provision (CEP) Take-Up Rate by Schools' Identified Student Percentage (ISP) for School Year 2023–2024

	Total	<40%		40-<50%			50-<60%		60%+		
State	Total Adopting	Adopting	Eligible	Adopting	Percentage Adopting	Eligible	Adopting	Percentage Adopting	Eligible	Adopting	Percentage Adopting
Alabama	1,013	6	72	15	20.8%	243	181	74.5%	890	811	91.1%
Alaska	217	0	80	66	82.5%	41	36	87.8%	126	115	91.3%
Arizona	522	1	295	120	40.7%	294	245	83.3%	183	156	85.2%
Arkansas	239	7	145	105	72.4%	112	84	75%	51	43	84.3%
California <sup>1</sup>	6,425	1,183	1,493	1,313	87.9%	1,647	1,534	93.1%	2,448	2,334	95.3%
Colorado	588	2	528	504	95.5%	57	49	86%	36	31	86.1%
Connecticut	492	0	166	135	81.3%	132	127	96.2%	232	230	99.1%
Delaware	131	15	89	84	94.4%	32	30	93.8%	3	2	66.7%
District of Columbia	189	10	20	17	85%	16	14	87.5%	159	148	93.1%
Florida	2,887	0	514	343	66.7%	957	832	86.9%	1,936	1,712	88.4%
Georgia <sup>1</sup>	892	69	254	171	67.3%	281	261	92.9%	417	391	93.8%
Hawaii	106	0	36	32	88.9%	22	20	90.9%	60	54	90%
Idaho	60	0	55	49	89.1%	8	5	62.5%	6	6	100%
Illinois	2,344	44	233	27	11.6%	159	68	42.8%	2,282	2,204	96.6%
Indiana	735	0	399	124	31.1%	291	160	55%	545	451	82.8%
lowa <sup>1</sup>	244	13	191	40	20.9%	128	71	55.5%	131	120	91.6%
Kansas	145	0	196	31	15.8%	139	45	32.4%	170	69	40.6%
Kentucky	1,135	0	162	149	92%	486	482	99.2%	511	504	98.6%
Louisiana	1,425	0	181	164	90.6%	310	309	99.7%	772	771	99.9%
Maine	79	0	69	57	82.6%	21	18	85.7%	6	4	66.7%
Maryland <sup>1</sup>	651	77	220	135	61.4%	225	180	80%	298	259	86.9%
Massachusetts	1,123	98	230	218	94.8%	159	153	96.2%	655	654	99.8%
Michigan	2,391	97	855	775	90.6%	534	455	85.2%	1,314	1,064	81%
Minnesota	375	0	281	63	22.4%	259	141	54.4%	349	171	49%
Mississippi <sup>1</sup>	396	12	62	29	46.8%	94	78	83%	293	277	94.5%
Missouri	427	4	318	140	44%	164	103	62.8%	256	180	70.3%
Montana	163	0	45	40	88.9%	39	35	89.7%	92	88	95.7%
Nebraska	167	1	96	25	26%	53	23	43.4%	136	118	86.8%
Nevada	519	1	244	234	95.9%	250	249	99.6%	35	35	100%
New Hampshire	4	2	13	1	7.7%	6	1	16.7%	0	0	N/A
New Jersey	365	3	275	127	46.2%	155	97	62.6%	160	138	86.3%
New Mexico	825	205	150	148	98.7%	313	312	99.7%	161	160	99.4%
New York	4,200	696	692	690	99.7%	404	398	98.5%	2,447	2,416	98.7%
North Carolina	1,625	0	317	126	39.7%	764	668	87.4%	873	831	95.2%
North Dakota	38	0	24	12	50%	6	3	50%	46	23	50%
Ohio	1,082	5	377	252	66.8%	505	471	93.3%	384	354	92.2%
Oklahoma	389	63	340	146	42.9%	162	102	63%	102	78	76.5%
Oregon	740	0	679	667	98.2%	45	40	88.9%	43	33	76.7%
Pennsylvania	1,712	33	534	275	51.5%	424	358	84.4%	1,115	1,046	93.8%
Rhode Island	76	16	17	5	29.4%	57	52	91.2%	3	3	100%
South Carolina	965	0	108	66	61.1%	295	285	96.6%	618	614	99.4%
South Dakota	100	0	11	10	90.9%	30	27	90%	64	63	98.4%
Tennessee <sup>1</sup>	886	168	262	220	84%	219	210	95.9%	295	288	97.6%
Texas	4,638	1	1,063	316	29.7%	1,885	1,394	74%	3,426	2,927	85.4%
Utah	68	0	23	23	100%	35	34	97.1%	14	11	78.6%
Vermont <sup>1</sup>	215	80	61	59	96.7%	51	49	96.1%	27	27	100%
Virginia	1,189	0	425	412	96.9%	373	372	99.7%	405	405	100%
Washington <sup>1</sup>	1,292	332	380	364	95.8%	293	291	99.3%	308	305	99%
West Virginia	606	33	138	129	93.5%	312	306	98.1%	140	138	98.6%
Wisconsin	647	0	381	183	48%	179	126	70.4%	365	338	92.6%
Wyoming	24	8	5	4	80%	5	5	100%	7	7	100%
U.S. Total	47,766	3,285	13,804	9,440	68.4%	13,671	11,589	84.8%	25,395	23,207	91.4%

<sup>1</sup> Eight states — California, Georgia, Iowa, Maryland, Mississippi, Tennessee, Vermont, and Washington — provided individual schools' ISP for participating schools. Therefore, these states may have schools indicated in ISP categories that do not accurately reflect the ISP used to determine federal reimbursements. California reported 61 schools without an ISP; Colorado reported two schools without an ISP; Illinois reported one school without an ISP; and Louisiana reported 181 schools without an ISP. These schools were excluded from this table; therefore, the total number of participating schools indicated in each ISP category is less than the total number of schools adopting CEP statewide.

**Table 4:** Student Enrollment for School Years (SY) 2014–2015<sup>1</sup>, 2015–2016<sup>2</sup>, 2016–2017<sup>3</sup>, 2017–2018<sup>4</sup>, 2018–2019<sup>5</sup>, 2019–2020<sup>6</sup>, 2020–2021<sup>7</sup>, 2021–2022<sup>8</sup>, 2022–2023, and 2023–2024<sup>10</sup>

	Enrollment												
State	SY 2014–2015	SY 2015-2016	SY 2016-2017	SY 2017-2018	SY 2018-2019	SY 2019–2020	SY 2020–2021	SY 2021–2022	SY 2022–2023	SY 2023–2024	SY 2022–2023 to SY 2023–2024		
Alabama <sup>11</sup>	180,789	196,802	195,853	208,748	208,929	208,068	101,387	222,189	240,153	478,063	237,910		
Alaska <sup>11</sup>	27,666	29,234	34,106	36,575	37,244	36,560	38,089	33,465	35,400	36,569	1,169		
Arizona	30,763	55,048	94,229	116,488	145,273	178,535	193,750	171,028	187,541	193,395	5,854		
Arkansas <sup>11</sup>	791	20,060	55,605	71,475	80,732	91,510	104,128	103,678	99,022	96,630	-2,392		
California <sup>11</sup>	113,513	435,900	748,533	799,646	1,690,225	1,944,304	2,207,703	2,174,949	3,524,445	3,640,659	116,214		
Colorado <sup>11</sup>	12,455	34,920	36,198	39,244	39,950	39,028	40,165	33,404	33,798	217,348	183,550		
Connecticut	66,524	105,547	110,322	118,067	151,552	175,155	208,824	206,444	233,711	237,123	3,412		
Delaware <sup>11</sup>	46,096	50,837	56,306	58,154	62,920	61,047	61,156	58,917	65,164	65,265	101		
District of Columbia	47,013	51,524	56,143	58,085	62,424	61,909	65,025	62,651	65,187	69,270	4,083		
Florida	274,071	474,006	579,138	705,602	858,135	872,443	913,549	933,123	1,787,164	2,111,632	324,468		
Georgia	354,038	420,383	467,411	472,296	490,319	510,532	494,963	524,495	521,529	523,175	1,646		
Hawaii	2,640	4,650	20,150	28,750	28,994	27,747	33,120	48,964	47,228	47,812	584		
Idaho	18,828	32,299	33,058	33,898	28,876	21,953	21,646	22,852	17,142	21,726	4,584		
Illinois <sup>11</sup>	552,751	672,831	685,101	725,241	731,062	762,195	804,574	793,894	870,519	997,346	126,827		
Indiana	96,604	117,187	127,405	136,855	172,969	224,192	247,399	241,398	282,269	354,967	72,698		
Iowa	32,103	46,021	50,589	53,880	67,192	81,424	83,660	83,234	107,405	114,818	7,413		
Kansas	5,992	19,641	22,661	25,722	26,338	26,038	13,563	10,912	9,648	51,981	42,333		
Kentucky	279,144	385,043	436,419	479,450	501,059	522,512	539,460	532,628	549,813	584,417	34,604		
Louisiana <sup>11</sup>	146,141	217,496	341,492	455,318	399,190	493,727	523,957	518,791	554,714	597,263	42,549		
Maine	5,284	17,977	20,411	20,435	23,733	19,975	Not Reported	Not Reported	21,882	22,053	171		
Maryland <sup>11</sup>	7,624	94,496	99,484	103,814	106,218	102,788	171,613	173,972	171,905	272,093	100,188		
Massachusetts <sup>11</sup>	134,071	200,948	238,872	260,364	282,030	301,465	274,211	330,684	389,055	517,861	128,806		
Michigan <sup>11</sup>	266,249	275,579	273,071	287,801	418,447	466,540	544,806	541,554	586,515	902,079	315,564		
Minnesota	20,688	49,944	57,003	57,957	63,057	51,818	53,982	50,873	54,787	134,943	80,156		
Mississippi	136,095	148,781	151,815	147,677	164,297	145,097	162,110	158,523	149,486	161,554	12,068		
Missouri <sup>11</sup>	106,126	111,319	121,962	134,996	139,884	143,692	142,542	142,654	134,522	139,800	5,278		
Montana	15,802	21,161	23,290	26,180	24,777	21,741	22,340	20,656	26,032	25,897	-135		
Nebraska	180	2,425	4,277	7,411	7,276	6,173	12,100	12,090	67,351	70,821	3,470		
Nevada	7,917	15,970	71,345	95,001	100,957	218,746	293,179	271,504	362,578	365,431	2,853		
New Hampshire	0	644	1,125	1,082	1,100	652	621	0	569	727	158		
New Jersey	99,840	107,277	127,108	140,199	153,533	144,312	143,586	143,264	148,078	156,709	8,631		
New Mexico <sup>11</sup>	119,300	149,057	164,569	177,388	175,756	186,116	187,301	176,450	220,400	256,065	35,665		
New York	505,859	528,748	603,795	1,586,981	1,646,409	1,742,005	1,719,661	1,755,995	1,739,621	2,356,379	616,758		
North Carolina	310,850	357,307	367,705	433,204	418,820	455,237	463,666	415,375	458,418	803,238	344,820		
North Dakota	5,284	5,661	5,698	6,039	6,525	7,424	9,420	9,420	8,893	9,043	150		
Ohio	305,451	354,727	363,860	397,594	409,467	410,400	412,116	416,274	431,250	415,865	-15,385		

Table 4: Student Enrollment for School Years (SY) 2014–2015<sup>1</sup>, 2015–2016<sup>2</sup>, 2016–2017<sup>3</sup>, 2017–2018<sup>4</sup>, 2018–2019<sup>5</sup>, 2019–2020<sup>6</sup>, 2020–2021<sup>7</sup>, 2021–2022<sup>8</sup>, 2022–2023, and 2023–2024<sup>10</sup> (continued)

					Enrol	lment					Change
State	SY 2014–2015	SY 2015-2016	SY 2016-2017	SY 2017–2018	SY 2018–2019	SY 2019–2020	SY 2020–2021	SY 2021–2022	SY 2022–2023	SY 2023–2024	SY 2022–2023 to SY 2023–2024
Oklahoma	43,433	66,323	104,162	148,994	152,695	154,078	99,447	123,293	124,882	131,917	7,035
Oregon <sup>11</sup>	103,601	129,635	130,336	129,766	122,553	133,615	240,052	245,362	277,613	293,812	16,199
Pennsylvania <sup>11</sup>	327,573	394,630	426,984	470,275	509,073	540,877	565,014	556,188	704,553	801,618	97,065
Rhode Island	838	6,531	10,350	16,675	18,043	30,915	32,220	31,774	37,426	37,284	-142
South Carolina <sup>11</sup>	111,453	173,364	201,587	235,711	249,036	255,006	265,027	254,439	240,894	570,148	329,254
South Dakota	13,056	14,626	15,981	15,499	19,409	18,332	20,310	20,824	15,661	15,532	-129
Tennessee	417,165	436,821	428,424	437,641	389,163	382,428	367,184	362,507	362,551	385,722	23,171
Texas <sup>11</sup>	941,262	1,015,384	984,976	1,184,559	1,566,088	1,873,513	2,111,019	2,088,076	2,343,402	2,600,579	257,177
Utah	7,019	8,565	8,880	12,353	20,148	20,900	19,194	15,159	19,066	27,133	8,067
Vermont <sup>11</sup>	7,386	12,751	13,508	13,946	13,768	12,053	12,239	13,045	21,019	51,371	30,352
Virginia <sup>11</sup>	42,911	99,404	119,051	156,687	204,610	241,056	385,041	512,500	567,126	638,489	71,363
Washington	53,369	69,432	75,357	95,514	110,815	126,278	158,518	195,397	545,548	579,899	34,351
West Virginia	124,978	145,057	177,875	195,075	208,960	209,566	212,362	225,803	216,667	226,092	9,425
Wisconsin	133,232	146,330	156,519	158,325	165,513	172,782	188,219	189,098	204,917	226,678	21,761
Wyoming	1,255	1,255	1,370	1,500	1,886	1,931	2,043	1,928	1,854	3,138	1,284
U.S. Total	6,663,073	8,531,558	9,701,469	11,780,137	13,677,429	14,936,390	15,987,261	16,231,697	19,886,373	23,639,429	3,753,056

- 1 Data for the 2014–2015 school year are from Take Up of Community Eligibility This School Year (Center on Budget and Policy Priorities, February 2015).
- 2 Data for the 2015–2016 school year are from Community Eligibility Adoption Rises for the 2015–2016 School Year, Increasing Access to School Meals (Food Research & Action Center and Center on Budget and Policy Priorities, updated May 2016).
- 3 Data for the 2016–2017 school year are from Community Eligibility Continues to Grow in the 2016–2017 School Year (Food Research & Action Center, March 2017). Some schools did not provide student enrollment information for the 2016–2017 school year: one school in California, two schools in Georgia, four schools in Idaho, three schools in Tennessee, and four schools in South Carolina.
- 4 Data for the 2017–2018 school year are from *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019). Some schools did not provide student enrollment information for the 2017–2018 school year: 12 schools in Alaska, 19 schools in Louisiana, four schools in Oklahoma, one school in South Carolina, and two schools in Vermont.
- 5 Data for the 2018–2019 school year are from *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019). Some schools did not provide student enrollment information for the 2018–2019 school year: four schools in Hawaii, 182 schools in Louisiana, 25 schools in Mississippi, 14 schools in South Carolina, and three schools in Utah.
- 6 Data for the 2019–2020 school year are from *Community Eligibility: The Key to Hunger-Free Schools, School Year 2019–2020* (Food Research & Action Center, May 2020). Some schools did not provide student enrollment information for the 2019–2020 school year: 19 schools in Alabama, 11 schools in California, four schools in the District of Columbia, five schools in Indiana, two schools in Louisiana, seven schools in Maine, two schools in Massachusetts, 10 schools in Michigan, one school in Nevada, four schools in Oregon, 18 schools in South Carolina, one school in South Dakota, five schools in Texas, and one school in Virginia.
- 7 Data for the 2020–2021 school year are from *Community Eligibility: The Key to Hunger-Free Schools, School Year 2020–2021* (Food Research & Action Center, June 2021). Some schools did not provide student enrollment information for the 2020–2021 school year: eight schools in Alabama, 43 schools in Florida, eight schools in Georgia, one school in Idaho, one school in Louisiana, 149 schools in Massachusetts, two schools in Michigan, three schools in Michigan, three schools in Tennessee, eight schools in Texas, one school in Washington.
- 8 Data for the 2021–2022 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2020–2021 (Food Research & Action Center, June 2022).
- 9 Maine did not report student enrollment data for the 2020–2021 or 2021–2022 school years.
- 10 Some schools did not provide student enrollment information for the 2022–2023 school year: 62 schools in Alabama, 11 schools in Arizona, one school in Newada, one school in New Mexico, 29 schools in New York, 40 schools in South Carolina.
- 11 The following states had schools that did not provide student enrollment numbers for the 2023–2024 school year: six schools in Alabama, one school in Alaska, two schools in Arkansas, 10 schools in California, four schools in Colorado, two schools in Delaware, one school in Illinois, 188 schools in Louisiana, one school in Massachusetts, two schools in Maryland, one school in Missouri, 32 schools in New Mexico, seven schools in Oregon, one school in Pennsylvania, four schools in South Carolina, 34 schools in Texas, 13 schools in Vermont, and two schools in Virginia.

**Table 5:** Number of Schools Adopting the Community Eligibility Provision (CEP) for School Years (SY) 2014–2015<sup>1</sup>, 2015–2016<sup>2</sup>, 2016–2017<sup>3</sup>, 2017–2018<sup>4</sup>, 2018–2019<sup>5</sup>, 2019–2020<sup>6</sup>, 2020–2021<sup>7</sup>, 2021–2022<sup>8</sup>, 2022–2023<sup>9</sup>, and 2023–2024

	Adopting												
State	SY 2014–2015	SY 2015-2016	SY 2016-2017	SY 2017-2018	SY 2018-2019	SY 2019–2020	SY 2020–2021	SY 2021–2022	SY 2022–2023	SY 2023–2024	SY 2022–2023 to SY 2023–2024		
Alabama	347	392	391	425	444	445	454	490	536	1013	477		
Alaska	123	137	174	213	208	208	216	208	211	217	6		
Arizona	73	133	227	296	372	446	500	493	508	522	14		
Arkansas	4	57	139	178	201	229	255	259	250	239	-11		
California	208	651	1,070	1,311	2,833	3,275	3,777	3,730	6,150	6425	275		
Colorado	34	82	91	101	105	105	108	100	106	588	482		
Connecticut	133	212	228	241	307	364	426	420	483	492	9		
Delaware	95	108	117	116	212	116	166	114	127	131	4		
District of Columbia	96	107	115	116	119	115	116	183	180	189	9		
Florida	548	831	1,001	1,142	1,356	1,374	1,440	1,462	2,542	2887	345		
Georgia	589	700	768	787	818	834	819	873	873	892	19		
Hawaii	6	25	43	65	69	68	80	106	106	106	0		
Idaho	50	88	92	92	82	61	62	64	61	60	-1		
Illinois	1,041	1,322	1,363	1,499	1,541	1,588	1,693	1,823	2,087	2,344	257		
Indiana	214	253	283	287	362	462	515	506	593	735	142		
lowa	78	110	119	123	156	176	177	176	221	244	23		
Kansas	18	64	69	72	75	70	44	31	34	145	111		
Kentucky	611	804	888	948	984	1,028	1,060	1,061	1,092	1135	43		
Louisiana	335	484	741	968	1,016	1,029	1,087	1,095	1,177	1425	248		
Maine	21	59	72	71	87	73	73	75	77	79	2		
Maryland	25	227	228	242	242	238	364	357	355	651	296		
Massachusetts	294	462	525	574	613	685	720	718	846	1123	277		
Michigan	625	662	652	715	1,105	1,259	1,466	1,468	1,638	2391	753		
Minnesota	56	125	153	154	163	146	153	150	160	375	215		
Mississippi	257	298	333	342	410	337	390	376	370	396	26		
Missouri	298	330	367	402	420	427	432	433	416	427	11		
Montana	93	127	138	158	157	150	154	147	167	163	-4		
Nebraska	2	9	15	26	26	26	43	45	151	167	16		
Nevada	13	36	122	153	167	316	399	388	501	519	18		
New Hampshire	0	2	3	3	4	3	3	0	3	4	1		
New Jersey	197	227	270	306	331	319	315	319	321	365	44		
New Mexico	343	429	487	535	546	568	574	556	667	825	158		
New York	1,246	1,351	1,561	3,381	3,565	3,481	3,633	3,021	3,051	4200	1,149		
North Carolina	648	752	787	914	882	941	955	879	974	1625	651		
North Dakota	23	24	25	26	29	31	37	37	37	38	1		

Table 5: Number of Schools Adopting the Community Eligibility Provision (CEP) for School Years (SY) 2014–2015<sup>1</sup>, 2015–2016<sup>2</sup>, 2016–2017<sup>3</sup>, 2017–2018<sup>4</sup>, 2018–2019<sup>5</sup>, 2019–2020<sup>6</sup>, 2020–2021<sup>7</sup>, 2021–2022<sup>8</sup>, 2022–2023<sup>9</sup>, and 2023–2024 (continued)

					Ado	pting					Change
State	SY 2014–2015	SY 2015–2016	SY 2016-2017	SY 2017–2018	SY 2018-2019	SY 2019–2020	SY 2020–2021	SY 2021–2022	SY 2022–2023	SY 2023–2024	SY 2022–2023 to SY 2023–2024
Ohio	739	842	918	998	998	1,022	1,025	1,062	1,141	1082	-59
Oklahoma	100	184	301	413	427	408	306	326	384	389	5
Oregon	262	340	346	344	341	353	622	588	709	740	31
Pennsylvania	646	795	861	959	1,031	1,112	1,171	1,172	1,478	1712	234
Rhode Island	1	10	21	34	37	58	61	61	68	76	8
South Carolina	226	348	412	471	515	531	531	538	546	965	419
South Dakota	142	109	124	89	97	97	102	110	100	100	0
Tennessee	862	924	909	914	836	840	831	845	877	886	9
Texas	1,477	1,665	1,678	2,070	2,716	3,250	3,700	3,740	4,231	4638	407
Utah	22	28	29	35	52	51	54	42	50	68	18
Vermont	32	56	60	68	62	53	56	59	92	215	123
Virginia	87	206	255	341	428	511	782	1,008	1,086	1189	103
Washington	122	172	193	232	273	314	394	482	1,213	1292	79
West Virginia	369	428	492	518	540	545	558	593	585	606	21
Wisconsin	348	381	415	422	438	468	494	498	591	647	56
Wyoming	5	5	7	10	11	14	14	13	13	24	11
U.S. Total	14,184	18,173	20,678	24,900	28,809	30,620	33,407	33,300	40,235	47,766	7,531

- 1 Data for the 2014–2015 school year are from Take Up of Community Eligibility This School Year (Center on Budget and Policy Priorities, February 2015).
- 2 Data for the 2015–2016 school year are from Community Eligibility Adoption Rises for the 2015–2016 School Year, Increasing Access to School Meals (Food Research & Action Center and Center on Budget and Policy Priorities, updated May 2016).
- 3 Data for the 2016–2017 school year are from Community Eligibility Continues to Grow in the 2016–2017 School Year (Food Research & Action Center, March 2017).
- 4 Data for the 2017–2018 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019 (Food Research & Action Center, May 2019).
- 5 Data for the 2018–2019 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019 (Food Research & Action Center, May 2019).
- 6 Data for the 2019–2020 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2019–2020 (Food Research & Action Center, May 2020).
- 7 Data for the 2020–2021 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2020–2021 (Food Research & Action Center, June 2021).
- 8 Data for the 2021–2022 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2021–2022 (Food Research & Action Center, June 2022).
- 9 Data for the 2022–2023 school year are from Community Eligibility: The Key to Hunger-Free Schools, School Year 2022–2023 (Food Research & Action Center, May 2023).



#### **Food Research & Action Center**

1200 18th Street, NW, Suite 400 Washington, DC 20036 202.986.2200 | www.frac.org



@fractweets



f facebook.com/foodresearchandactioncenter



@fracgram



in linkedin.com/company/food-research-and-action-center