Community Eligibility

Center on Budget and Policy Priorities | FRAC Food Research & Action Center

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Community Eligibility Adoption Rises for the 2015–2016 School Year, Increasing Access to School Meals

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Introduction

In the 2015–2016 school year, its second year of nationwide availability, more than 18,000 high-poverty schools, in nearly 3,000 school districts across the country, have adopted community eligibility, an option that allows qualifying schools to offer breakfast and lunch at no charge to all students without collecting and processing individual school meal applications.[1] This is an increase of about 4,000 schools compared to the prior year, further demonstrating the appeal of the new provision.

These schools, which serve more than 8.5 million children, represent half of all eligible schools, a strikingly high take-up rate for such a new federal program.[2] Those figures are up from 14,214 schools — about 45 percent of those eligible — serving 6.7 million students in the 2014–2015 school year. Consistent with last year, take-up was higher among the highest-poverty schools, where nearly all children are already eligible for free or reduced-priced meals.

Congress created the Community Eligibility Provision in the 2010 reauthorization of the child nutrition programs. After a three-year phase-in period, the provision became available nationwide in the 2014–2015 school year. Schools across the country have quickly adopted it due to its many benefits.[3] Community eligibility is a powerful tool that allows school districts to target nutrition

[1] This paper uses the term "school districts" to refer to Local Educational Agencies.

[2] Under federal law, states were required to publish a list of schools that were eligible for the Community Eligibility Provision. Based on those lists, more than 34,000 schools were eligible. Because states were permitted to use proxy data that missed some eligible schools, the number of eligible schools was likely modestly higher.

[3] For a comprehensive explanation of community eligibility and analysis of its implementation in the first two years, see Madeleine Levin and Zoë Neuberger, "Community Eligibility: Making High-Poverty Schools Hunger-Free," Center on Budget and Policy Priorities and Food Research & Action Center, October 1, 2013, http://www.cbpp.org/research/community-eligibility-making-high-poverty-schools-hunger-free.

benefits to children in high-poverty schools. It not only eliminates redundant paperwork at such schools, but also makes possible substantial gains in meeting vulnerable children's nutritional needs by providing them with a free and healthy breakfast and lunch at school each day. Reliable access to healthy meals, in turn, better prepares students to learn.

Community eligibility's popularity in its first two years of nationwide implementation speaks to schools' desire to improve access to healthy meals while reducing red tape, as well as to the option's sound design. Including the three initial years during which 11 states piloted community eligibility, take-up rates have risen each year, demonstrating the provision's popularity as more eligible districts have become aware of its many benefits and ease of implementation. State agencies also have become more familiar with community eligibility, which has contributed to more widespread adoption. Through the piloting and first year of nationwide availability, the U.S. Department of Agriculture (USDA), the U.S. Department of Education, and state child nutrition agencies gained experience with community eligibility and were then able to offer more targeted technical assistance, trainings, and outreach to districts to facilitate implementation. State and local anti-hunger advocates also played an important role in educating eligible schools about the new option.

Nevertheless, many eligible schools still have not yet implemented community eligibility, and take-up varies substantially across states. This report is designed to help state and local education stakeholders, school nutrition administrators, policymakers, and state and local anti-hunger advocates identify eligible schools and districts that have not adopted the option but could benefit from it. (Appendix 2 describes resources to support its implementation.) The report assesses community eligibility take-up in each state for the 2015–2016 school year using three measures, and compares the findings for each measure to take-up last year:

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

The report summarizes data gathered by USDA, in collaboration with the Center on Budget and Policy Priorities and the Food Research & Action Center (FRAC).[4] The data are summarized in Appendix 1 and are available in a searchable database.[5] Appendix 3 explains the data collection process.

How Does Community Eligibility Work?

Community eligibility simplifies the school meal enrollment process for high-poverty schools by enabling them to do away with household meal applications — thereby eliminating a major administrative burden — and serve breakfast and lunch at no charge to all students.

[4] USDA's press release is available at http://www.usda.gov/wps/portal/usda/usdamediafb?contentid=2015/10/0297.xml&printable=true&contentidonly=true.

[5] The database is available at http://www.cbpp.org/database.

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

- First, certain students are automatically enrolled for free meals without an application. Students in households participating in the Supplemental Nutrition Assistance Program (SNAP, formerly food stamps), the Temporary Assistance for Needy Families (TANF) cash assistance program, or the Food Distribution Program on Indian Reservations (FDPIR) can be identified through data matching, a process known as "direct certification." Other students can be automatically enrolled for free meals because they are homeless, migrant, runaway, in Head Start, or in foster care.
- Next, schools collect school meal applications from the remaining students in order to determine which students are eligible for free or reduced-price meals based on their household income.

Community eligibility schools rely solely on students identified without an application and therefore no longer have to collect school meal applications, determine and verify eligibility, or track eligibility whenever a meal is served.[6] As a result, they can focus on education and providing two nutritious and appealing meals daily.

Under community eligibility, these especially vulnerable students who are identified without an application are known as *identified students.* A school's eligibility for community eligibility is based on its Identified Student Percentage (ISP), which is determined by dividing its total number of identified students by its total enrollment. Schools with an ISP of 40 percent or greater can adopt community eligibility. It is important to note that identified students are only a *subset* of those who would qualify for free or reduced-price meals if the school collected school meal applications; schools that are eligible for community eligibility typically have a much higher percentage of low-income students than their ISP.

School districts determine whether to adopt community eligibility and for which eligible schools. Districts may choose to implement the option in an individual school, group of schools, or districtwide. Nearly 4,000 districts are eligible for the option districtwide, and in about another 3,300, a subset of schools are eligible. Community eligibility was designed to serve high-poverty schools, even those situated in districts that are not uniformly low income; many districts have implemented the provision for some, but not all, eligible schools.

Community eligibility also simplifies how schools are reimbursed for meals served. Under the school meal programs' traditional reimbursement structure, at each meal school districts keep track of which students eat and whether they qualify for free, reduced-price, or paid meals. School districts then receive a per-meal federal reimbursement, which is highest for free meals. For schools implementing community eligibility, the reimbursements are based on the school's ISP. A school's ISP is multiplied by 1.6 to approximate the share of students that would receive free or reduced-price meals if the school collected meal applications; the resulting percentage is the share of meals that are reimbursed at the highest (free) federal reimbursement rate, while the remaining meals are reimbursed at the lowest (paid) rate. (The 1.6 multiplier was derived from analyses indicating that for every ten students who were approved for free school meals without an application, six more were approved for free or reduced-price meals based on an application.) Of course, federal reimbursements cannot exceed 100 percent of the meals served.

[6] A more detailed explanation of how community eligibility works can be found in Levin and Neuberger, "Community Eligibility: Making High-Poverty Schools Hunger-Free," pp. 7-11.

The fact that schools with higher ISPs receive the highest reimbursement rate for more meals makes it financially easier for them to implement community eligibility. In fact, a school with an ISP of 62.5 percent or higher receives the highest federal reimbursement for *all* of its meals. In schools with a lower ISP, administrative savings from eliminating applications and economies of scale for food procurement and labor often cover the cost of meals served to students who would otherwise pay. But schools with ISPs just above 40 percent might need to provide additional non-federal resources if their federal reimbursements do not fully cover the cost of serving meals at no charge to all students. Because the financial viability of community eligibility depends on local costs and other local factors, the decision about whether to adopt the option rests with school districts.

Another local consideration for schools implementing community eligibility comes from eliminating school meal applications. While removing this process eases the administrative burden for the school nutrition department, it is important to note that the data from these applications have long been used for many purposes outside of school nutrition. For example, the data from school meal applications are used by some states to allocate state education funding or by school districts to determine eligibility for certain education services or fee waivers. There are many alternative data options for community eligibility schools; states can establish policies that better support school districts that choose to implement community eligibility.[7]

[7] For a comprehensive discussion of options available to community eligibility schools to identify low-income students, see Jessie Hewins, Madeleine Levin, Zoë Neuberger, and Becca Segal, "The Community Eligibility Provision: Alternatives to School Meal Applications," Food Research & Action Center and Center on Budget and Policy Priorities, June 19, 2014, http://www.cbpp.org/research/the-community-eligibility-provision-alternatives-to-school-meal-applications.

Growing Up in Concentrated Poverty Has Lasting Impact on Youth Development

Growing up in a high-poverty neighborhood can have lasting effects on a child's growth and development. High-poverty neighborhoods, which can be violent, stressful, and environmentally hazardous, can impair children's cognitive development, school performance, mental health, and long-term physical health — even if the family itself is not low-income.[a] Schools that are eligible to participate in community eligibility meet a stringent threshold and are located in some of the nation's poorest, most vulnerable communities, including urban districts like Baltimore, Chicago, and Detroit, as well as rural areas of Kentucky and West Virginia, where nearly all students qualify for free or reduced-price school meals. Data from these schools provide a sobering look at areas of concentrated poverty and how widespread these pockets are in every state.

Social interventions have made a difference for children in high-poverty communities. In particular, access to healthy meals at home and at school through the federal nutrition programs, including the Supplemental Nutrition Assistance Program (SNAP) and school meal programs, can help children overcome some of the negative consequences of poverty and food insecurity. These programs work hand in hand to help low-income families stretch limited budgets and support positive health and education outcomes for low-income children.

Food insecurity is linked to a number of negative health outcomes, such as increased risk of heart disease and diabetes, as well as nutritional deficiencies and negative behavioral, social, and academic outcomes with lasting consequences.[b] A recent Council of Economic Advisers (CEA) report detailed the positive benefits SNAP can have for children and families.[c] By reducing poverty and food insecurity, SNAP can improve health and development, particularly for children. Children receiving SNAP face lower risks of nutritional deficiencies and poor health than they would without SNAP, which can lead to improved health over their lifetimes, according to studies cited in the CEA report, which also noted that SNAP improves children's success in school. One study, for example, found that test scores among students in SNAP households are highest for those receiving benefits two to three weeks before the test, suggesting that SNAP can help students learn and prepare for tests. Short-term academic outcomes, in turn, are linked with longer-term outcomes in education and employment. Children in households receiving SNAP automatically qualify for school meals through the National School Lunch and School Breakfast Programs.

For school districts with high-poverty schools, adopting community eligibility can increase access to school meals and help children perform better in school. Children experiencing hunger have been found to have lower math scores and be more likely to repeat a grade.[d] Teens experiencing hunger are more likely to have been suspended from school and have difficulty getting along with other children.[e] Meanwhile, educators report that children who eat breakfast at school are more likely to arrive at school on time, to behave, and be attentive in class.[f]

[a] Barbara Sard and Douglas Rice, "Creating Opportunity for Children," Center on Budget and Policy Priorities, October 15, 2014, http://www.cbpp.org/sites/default/files/atoms/files/10-15-14hous.pdf.

[b] Brynne Keith-Jennings, "SNAP Promotes Long-Term Gains, Especially for Children," Center on Budget and Policy Priorities, December 11, 2015, http://www.cbpp.org/blog/snap-promotes-long-term-gains-especially-for-children.

[c] "Long-term Benefits of the Supplemental Nutrition Assistance Program," Executive Office of the President, December 2015, https://www.whitehouse.gov/sites/whitehouse.gov/files/documents/SNAP_report_final_nonembargo.pdf.

[d] Katherine Alaimo, Christine M. Olson, and Edward A. Frongillo, Jr. "Food Insufficiency and American School-Aged Children's Cognitive, Academic, and Psychosocial Development," *Pediatrics* 2001, 108(1):44-53.

[e] *Ibid.*

f J. Michael Murphy, "Breakfast and Learning: An Updated Review," *Journal of Current Nutrition and Food Science* 2007, 3(1): 3-36.

What Share of Eligible *School Districts* Have Adopted Community Eligibility?

Nationwide, 2,979 school districts — 37 percent of those eligible — are now using the Community Eligibility Provision in some or all schools.[8] This is an increase from 2,216 school districts, or 32 percent of those eligible, in the 2014–2015 school year. The median state's take-up rate for eligible school districts was 36 percent. Figure 1 shows the variation across states in community eligibility take-up by school districts.

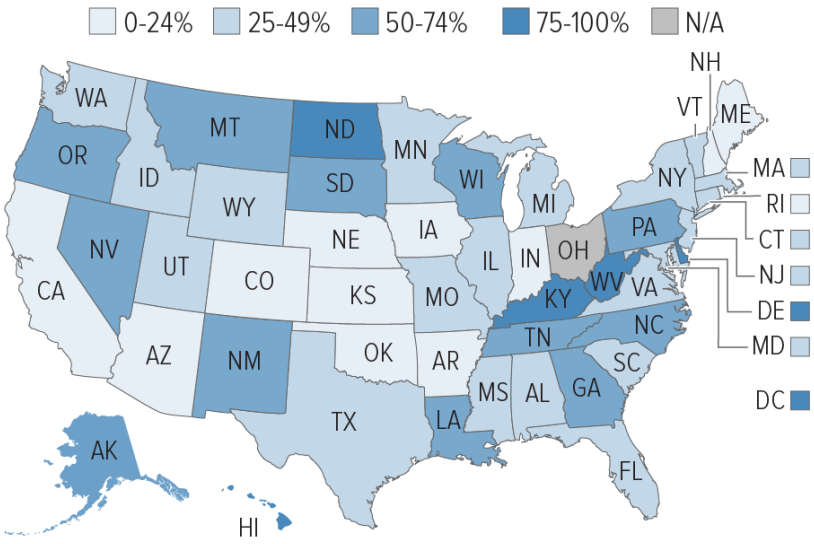
Almost all states increased the number of districts implementing community eligibility, but the rise in the number of participating districts varied considerably across states. Some states doubled or nearly doubled their participating districts. In Hawaii, for example, an additional five participating districts joined the six participating districts from the 2014–2015 school year so that 79 percent of eligible districts now have adopted community eligibility. New Mexico increased the number of electing districts from 53 in the 2014–2015 school year to 93 this year, bringing the share of all eligible districts that have adopted community eligibility to 71 percent. In Louisiana, the state did not issue a new funding policy until just before the 2014–2015 school year, leading some school districts to hold off on adopting community eligibility that year. For 2015–2016, as schools became aware of the new policy and the many benefits experienced by districts that had already adopted it, 19 more districts opted in, bringing the total number of participating districts to 63 out of 108 eligible, or 58 percent. At the other end of the spectrum, Wyoming did not add any additional districts (but did add participating schools).

[8] Under federal law, states were required to publish a list of school districts that were eligible for the Community Eligibility Provision districtwide, as well as a list of individual schools that were eligible. Links to each state's lists can be found at http://www.cbpp.org/research/food-assistance/school-districts-and-schools-that-are-eligible-for-the-school-meals. To determine the universe of eligible districts, this analysis includes all districts with at least one eligible school. It includes districts with schools that adopted community eligibility, even if the district did not appear on the original list, because, in some instances, the published lists were based on "proxy data" available to states rather than the actual school district data that are the basis for approving districts. For more information on requirements related to the published lists, see http://www.fns.usda.gov/sites/default/files/SP32-2014os.pdf.

FIGURE 1

Percentage of Eligible School Districts Adopting Community Eligibility

School Year 2015-2016



Source: CBPP and FRAC analysis of data on eligible schools and districts published by state child nutrition agencies in May 2015 and data on schools and districts adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016.

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Several of the pilot states approved to offer community eligibility in the years before the nationwide rollout in 2014–2015, including Florida, Illinois, Kentucky, and Massachusetts, experienced significant growth in the number of school districts participating, continuing the upward trend of previous years. Illinois, Kentucky, and Michigan were first to offer the provision in the 2011–2012 school year; the District of Columbia, New York, Ohio, and West Virginia were added in the 2012–2013 school year; Florida, Georgia, Maryland, and Massachusetts implemented in the 2013–2014 school year. Kentucky was particularly strong in school district growth, adding 33 new districts in the 2015–2016 school year to the 104 already participating. Fully 80 percent of all eligible school districts in Kentucky are now participating in community eligibility in all or some of their schools.

Many districts that declined to implement community eligibility last year when it first became available decided to implement it for this school year. One factor contributing to delayed implementation was that during the first year of nationwide availability, some states did not set state-specific policy, for example, on how state education funding will be allocated to community eligibility schools in the absence of school meal application data on student income. Data from school meal applications have long been used for many purposes, including allocating funding and determining which students are eligible for certain services, such as tutoring or test fee waivers.

Districts can use alternative poverty measures in community eligibility schools, such as direct certification or Medicaid data, or determine which individual students qualify for services through a household income form separate from the school meal programs. When a state does not establish a clear policy, however, districts at first may be wary of adopting community eligibility without knowing

the effects it might have beyond the school nutrition department. Leading up to the 2015–2016 school year, many states assessed lessons learned from other states and from implementing districts within their state to develop and clarify state policies for community eligibility schools, resulting in more school districts choosing to implement community eligibility.

In addition, statewide outreach and education remain key steps to increasing the number of school districts participating in community eligibility. State education and school nutrition program administrators can identify remaining districts that could benefit from the option but have not yet tried it, and work with them to assess the feasibility of doing so. It is important to keep in mind, however, that school districts vary tremendously in size and may require differentiated technical assistance. For example, in Hawaii, Ke Ana La'ahana Public Charter School with 44 students is a single school district, as is the Los Angeles Unified School District serving more than 640,000 students. Similarly, North Dakota's Fort Yates Public School district has just one eligible school, while Florida's Miami-Dade County could adopt community eligibility districtwide for all of its 351 schools. Program administrators and other stakeholders continue to weigh these factors when developing training and education for eligible districts that have not yet adopted community eligibility.

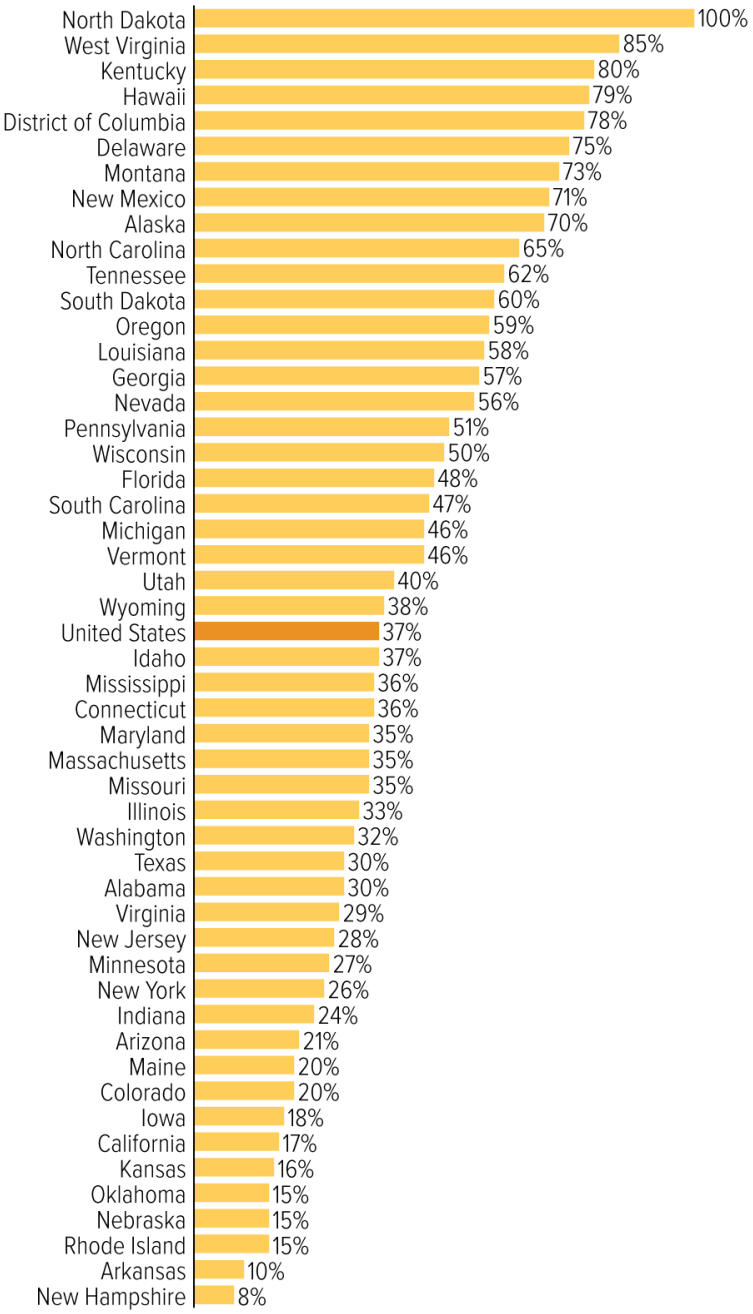
As educators become more familiar with community eligibility, the share of eligible districts that participate likely will continue to grow.

Figure 2 shows the share of school districts in each state that adopted the option this year.

FIGURE 2

Percentage of Eligible School Districts Adopting Community Eligibility

School Year 2015-2016



Note: Data not available for Guam and Ohio.

Source: CBPP and FRAC analysis of data on eligible schools and districts published by state child nutrition agencies in May 2015 and data on schools and districts adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016.

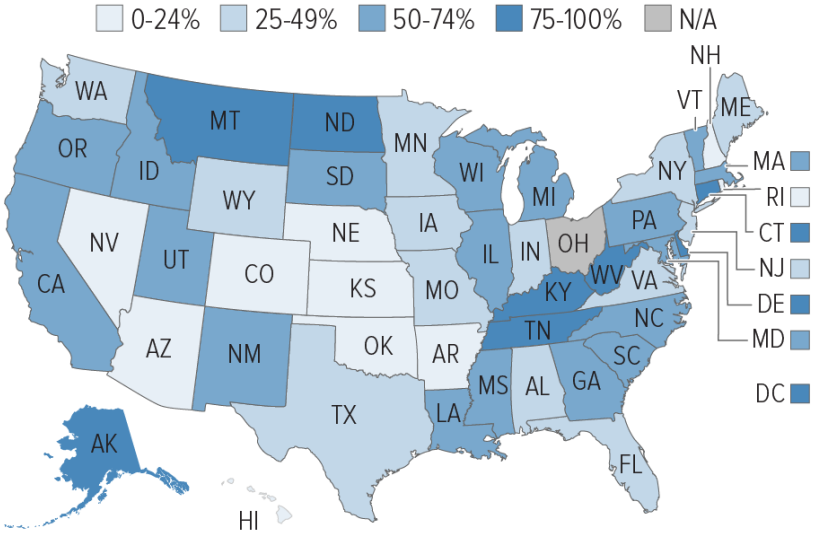
What Share of Eligible *Schools* Have Adopted Community Eligibility?

Nationwide, 18,247 schools have adopted community eligibility for the current school year, half (50 percent) of those eligible.[9] These schools serve just over 8.5 million students, more than half (56 percent) of the roughly 15.2 million students who attend eligible schools.[10] This is an increase from the 14,214 schools serving 6.7 million children that used community eligibility during the 2014–2015 school year.

FIGURE 3

Percentage of Eligible Schools Adopting Community Eligibility

School Year 2015-2016



Source: CBPP and FRAC analysis of data on eligible schools and districts published by state child nutrition agencies in May 2015 and data on schools and districts adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016.

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[9] States were required to publish a list of schools that were eligible for the Community Eligibility Provision. Links to each state's lists can be found at http://www.cbpp.org/research/food-assistance/school-districts-and-schools-that-are-eligible-for-the-school-meals. To determine the universe of eligible schools, this analysis includes schools that adopted community eligibility, even if the school did not appear on the original list, because in some instances the published lists were based on "proxy data" available to states rather than the actual school district data that are the basis for approving districts and schools.

[10] Student enrollment data for schools that adopted community eligibility were collected in the fall and winter of 2015 and reflect enrollment for the 2015–2016 school year, but student enrollment data for eligible schools that have not adopted community eligibility were taken from the state lists of eligible and near-eligible schools published in May 2015 and reflect enrollment for the 2014–2015 school year.

Almost all states increased the number of schools participating in community eligibility from last school year, though growth varies considerably by state.[11] Figure 3 shows the variation across states in community eligibility take-up by schools. California added the largest number of schools, with 443 new schools in 2015–2016, 339 of which are in the Los Angeles Unified School District. Other large states, including Florida, Illinois, and Maryland, had large increases as well with 283, 281, and 202 new schools, respectively. Several medium-sized states also increased participation substantially. Through strong outreach efforts to eligible schools and districts by the state child nutrition agency and other stakeholders, Massachusetts increased by 168 schools and Virginia by 119 schools. Some states with smaller populations and numbers of eligible schools also substantially increased the number of participating schools. New Mexico increased by 86 schools and West Virginia increased by 59 schools.[12] Figure 4 shows the share of schools in each state that adopted the option this year.

The 11 pilot states continued to add significant numbers of schools in the 2015–2016 school year. The continued growth in these pilot states is partially because they have had time to establish sound state policy for community eligibility schools. Maryland, for example, clarified the state's education funding formula for community eligibility schools through the Hunger-Free Schools Act of 2015. On the same day the act was signed into law, Baltimore City Public Schools adopted community eligibility in all of their 186 schools. In addition, these states have had several years to educate districts about the option and school district administrators have had the opportunity to witness its benefits. In addition to Maryland, pilot states with substantial growth in the number of schools participating in the 2015–2016 school year include Florida, Illinois, Kentucky, and Massachusetts. Massachusetts and Florida expanded their use of Medicaid data for direct certification, which improved their ability to identify low-income students and increased the pool of schools eligible for community eligibility.

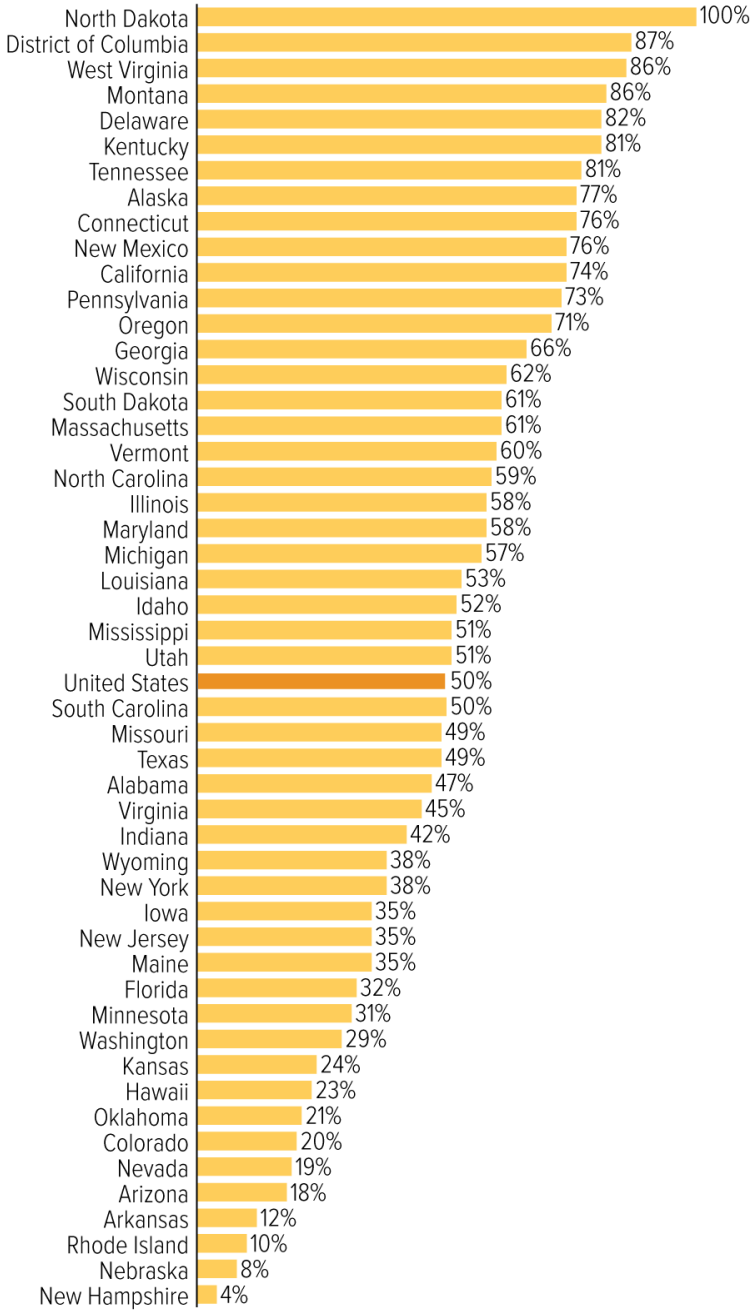
[11] South Dakota is the only state in which the total number of community eligibility schools declined, decreasing from 142 in the 2014–2015 school year to 109 in the 2015–2016 school year.

[12] There are some states, however, where substantial changes occurred between the number of schools on last year's list of eligible schools and this year's, creating the appearance of a more substantial change in take-up than actually occurred. In Washington and Arizona, the states' data collection methodology changed. Florida and New York expanded their use of Medicaid data for direct certification, which improved their ability to identify low-income students and increased the pool of schools eligible for community eligibility. Oregon corrected a mistake in the methodology used to generate last year's list of eligible schools.

FIGURE 4

Percentage of Eligible Schools Adopting Community Eligibility

School Year 2015-2016



Note: Data not available for Guam and Ohio.

Source: CBPP and FRAC analysis of data on eligible schools and districts published by state child nutrition agencies in May 2015 and data on schools and districts adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016.

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

Schools with ISPs of 60 percent or higher receive the highest federal reimbursement rate (depending on the ISP, 96 percent to 100 percent of meals served are reimbursed at the federal free rate), making implementing the Community Eligibility Provision financially easier. Schools with ISPs this high serve an overwhelming majority of low-income students. Implementing community eligibility in these highest-poverty schools ensures that nutritious meals reach the most vulnerable children.

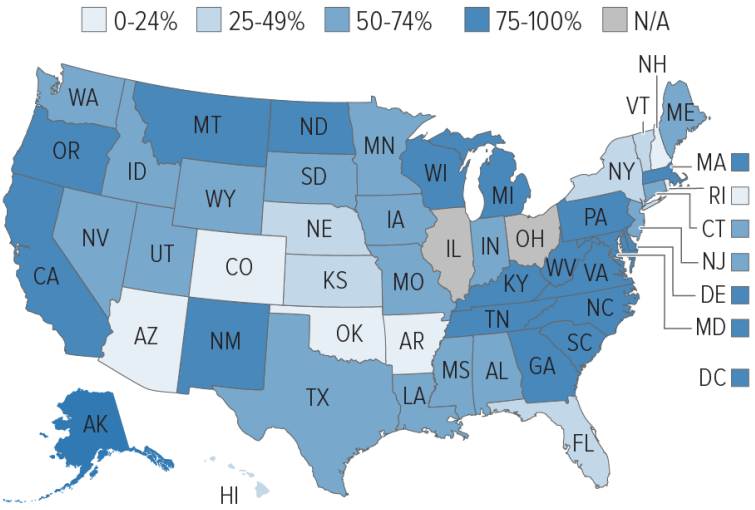
Across the states for which data on the highest-poverty schools were available, 14,051 of the eligible schools had ISPs of 60 percent or higher.[13] In states for which data were available, 9,129 highest-poverty schools adopted community eligibility, resulting in a take-up rate of 65 percent for the 2015–2016 school year, slightly higher than the 63 percent take-up rate for the 2014–2015 school year. In the median state, 69 percent of the highest-poverty schools participated, but the rate varied by state, from 100 percent in North Dakota (17 of the 17 highest-poverty schools), 97 percent in the District of Columbia (113 of the 116 highest-poverty schools), and 96 percent in Montana (50 of the 52 highest-poverty schools), down to 0 percent in New Hampshire (none of the five highest-poverty schools). Figure 5 shows the variation across states in community eligibility take-up by the highest-poverty schools for the 2015-2016 school year. Figure 6 shows the share of the highest-poverty schools in each state that have adopted the option.

[13] CBPP and FRAC obtained ISPs for schools adopting community eligibility from 50 states, the District of Columbia, and Guam directly from USDA and state agencies. For eligible schools that have not yet adopted community eligibility, ISP data were available for 48 states (all but Illinois and Ohio) and the District of Columbia.

FIGURE 5

Percentage of Highest-Poverty Schools Adopting Community Eligibility

School Year 2015-2016



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

Source: CBPP and FRAC analysis of data on eligible schools published by state child nutrition agencies in May 2015 and data on schools adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies between September 2015 and April 2016.

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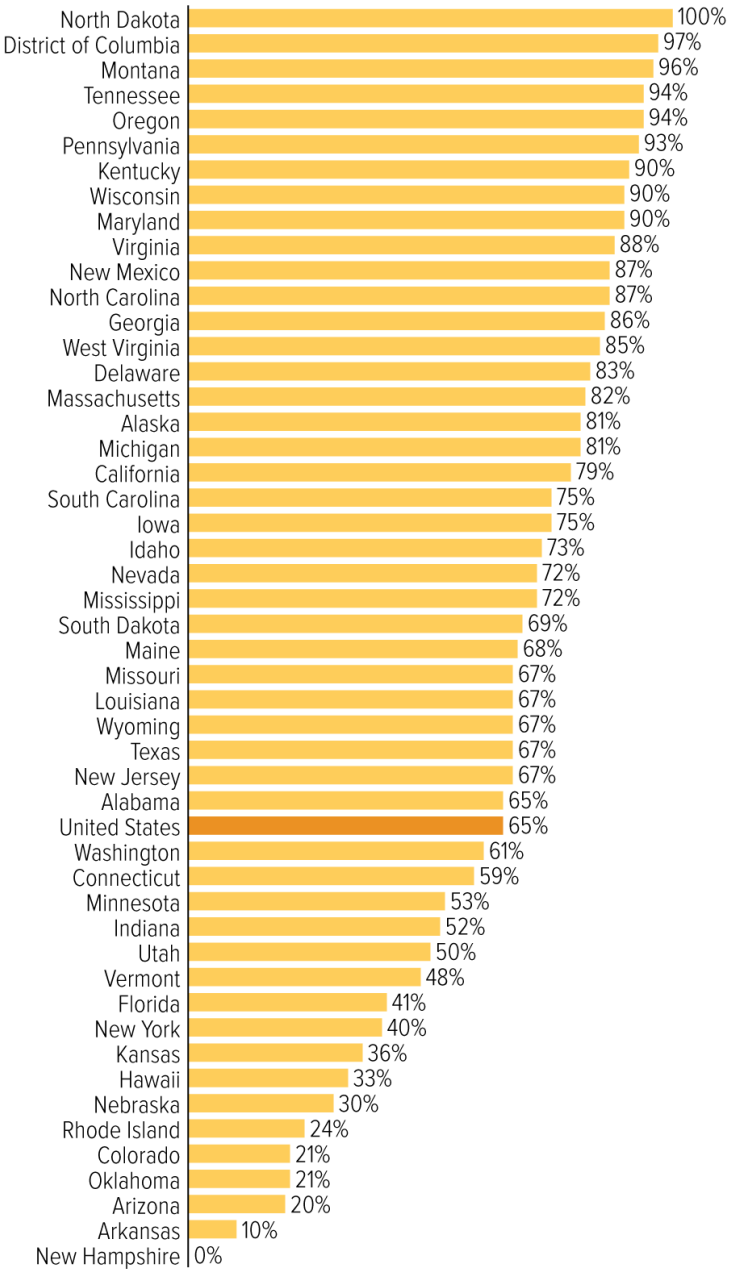
FIGURE 6

Percentage of Highest-Poverty Schools Adopting Community Eligibility

School Year 2015-2016



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

Source: CBPP and FRAC analysis of data on eligible schools and districts published by state child nutrition agencies in May 2015 and data on schools and districts adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016.

What Can We Learn from These Take-Up Measures?

With a full year and a half of nationwide implementation of community eligibility complete, states and school districts have learned many lessons that can help increase take-up in the coming years. Nonetheless, education about community eligibility is still needed. Detailed information about which eligible districts and schools have adopted community eligibility can help school nutrition administrators — and other stakeholders who would like schools in high-poverty communities to offer meals at no charge to all students — to educate school districts about the option. This information can illuminate the advantages of adopting community eligibility and strategies to address barriers to participation, and inform the development of more tailored training and outreach plans. For example, if larger districts in a state have widely adopted community eligibility but smaller districts have not, state staff can reach out to smaller districts to address their concerns.

Some observations and likely explanations about the data across eligible districts, schools, and the highest-poverty schools:

- **In some states, take-up is much higher on one measure than another.** About two-thirds of the states have higher take-up rates among schools than districts. This likely reflects greater interest in community eligibility among districts that can implement it in more schools; these districts, with larger shares of low-income students, may be more attuned to supporting these schools to meet their students' needs. For example, in Massachusetts, only 35 percent of eligible school districts have adopted community eligibility, but 61 percent of eligible *schools* have. This reflects the fact that the larger districts with concentrated poverty, including Boston, Springfield, and Worcester — comprising roughly a third, or 251 of Massachusetts' 756 eligible schools — have adopted community eligibility districtwide. But by working with districts that have smaller pockets of poverty affecting only a few schools, school meal administrators and advocates could help bring the benefits of community eligibility to poor students in smaller low-income neighborhoods.

  Nonetheless, in 11 states, the share of districts adopting community eligibility exceeds the share of schools. This could occur when school districts with only a single school or a few schools adopt the provision, which is often the case for charter schools. Alternatively, it could reflect districts trying community eligibility in a small number of their eligible schools to see how it works. Of greater concern is the possibility that a state with higher take-up among districts than schools indicates that districts with larger concentrations of poverty are not participating. In Nevada, for example, 56 percent of eligible districts, but only 19 percent of eligible schools, have implemented community eligibility. Most of Nevada's eligible schools are concentrated in two districts. In Clark County, there are 141 eligible schools, but only 29 schools have implemented, and in Washoe County, there are 31 eligible schools, none of which are participating. These two districts comprise 172 of the 194 schools eligible in Nevada and collectively serve over 350,000 students. Stakeholders have an opportunity to ascertain these districts' concerns and potentially develop policy responses.

- **Take-up is still greatest among the highest-poverty schools, yet many such schools have yet to implement the provision.** Because schools with higher ISPs have greater student need and receive higher federal reimbursements, it is not surprising that they generally are more likely to adopt community eligibility. In Virginia, for example, 88 percent of schools with ISPs of 60 percent or higher have adopted the provision, compared with 45 percent of all eligible schools. But in states where take-up is only modestly higher, if at all, among the highest-poverty schools — such as Colorado, where take-up is 21 percent among schools with ISPs of 60 percent or higher and 20 percent among all eligible schools, or Florida, where take-up is 41 percent among schools with ISPs of 60 percent or higher and 32 percent among all eligible schools —

many of the highest-poverty schools are concentrated in large districts that have chosen not to implement community eligibility in any schools. For these communities, it could be useful to make sure that the highest-poverty schools understand the community eligibility reimbursement structure and use USDA's tool to estimate federal reimbursements under the option.[14]

- **States with high take-up in their first year of implementation continued to make gains in the second year.** In Alaska and Tennessee, for example, take-up was relatively high across all three measures (school districts, schools, and highest-poverty schools), reflecting supportive policies and concerted outreach efforts to eligible schools. Because of this early effort in the first year, Alaska and Tennessee were able to focus this year on remaining districts that could benefit from adopting the provision. Now with success in the first and second years, they also can share training materials, policies, and implementation strategies with states with lower take-up rates.
- **Take-up will likely continue to grow.** As direct certification systems improve, state agencies become more accustomed to community eligibility, and as districts benefit from the experience of their peers, take-up among eligible schools likely will continue to rise. The opportunity for district-level staff to learn from their peers is especially important. Many districts that initially implement in some, but not all, schools also tend to add more schools the following school year after seeing the benefits of community eligibility. As the benefits become clear, educators, parents, advocates, and other stakeholders will seek to have more schools adopt community eligibility.
- **Continued low take-up in some states likely reflects state-specific barriers.** In Arkansas, for example — where only 18 of the 180 eligible school districts have adopted community eligibility — robust implementation was delayed because of a state education funding policy that needed to be clarified. Before year two, Arkansas enacted a policy to allow schools to adopt community eligibility without fear that the absence of data from school meal applications would affect state funding. For schools implementing community eligibility, Arkansas will generally use free and reduced-price data for the year prior to electing the option, with a plan to reexamine the measure's accuracy in five years and an option to rely on alternative income forms if meaningful shifts occurred.[15] Despite the state establishing the policy before the 2015–2016 school year, many districts still chose not to adopt the measure, signaling that more education, outreach, and training might be needed.

  Similarly, a few remaining states that rely on data from school meal applications to allocate state education funding are still determining the best approaches to ensure that community eligibility schools receive needed resources. Nebraska, for example, is considering how it can use alternative methods to measure poverty in place of school meal applications, but has not yet established a final policy. This has affected community eligibility implementation in the state, as no additional eligible schools adopted community eligibility between the end of the 2014–2015 school year and the start of the 2015–2016 school year. As lacking such a policy can be a barrier to implementation, states are encouraged to learn from other successful state approaches on how to handle alternative sources to school meal applications.

[14] USDA's estimator tool is available at http://www.fns.usda.gov/sites/default/files/cn/SP15-2013a2updated2.xls.

[15] Arkansas Department of Education, Emergency Rules Governing Distribution of Student Special Needs Funding and the Determination of Allowable Expenditures of Those Funds, September 2015, http://www.arkansased.gov/public/userfiles/rules/Current/Student_Special_Needs_Funding_Emergency_Rules_2015_Update_Final_w_Emergency_Clause.pdf.

Conclusion

Community eligibility helps ensure that low-income children who attend schools in high-poverty neighborhoods have access to a nutritious breakfast and lunch each school day at no charge. Implementing community eligibility is a concrete step that educators and policymakers can take to increase school meal participation, which has been shown to improve student achievement, diets, and behavior, and to help reduce food insecurity and other poverty-related hardships among children in areas of concentrated poverty. It also substantially reduces administrative work for schools so they can focus their efforts on feeding and educating their students instead of completing paperwork. The fact that half of eligible schools have adopted community eligibility in its second year of nationwide availability demonstrates its appeal. An increase of more than 4,000 schools from the 2014–2015 school year to the 2015–2016 school year shows that as school districts learn about the many benefits of the provision, more schools decide to participate. Still, in many states there remains significant room for greater adoption of the provision. As states and school districts continue to work through state- and district-specific barriers and understand community eligibility's benefits for our nation's poorest students, adoption of the provision likely will continue to grow, benefitting many more low-income children and communities.

Appendix 1

TABLE 1

Community Eligibility Provision (CEP) Take-Up in School Districts for School Years 2014–2015 and 2015–2016

State	2014–2015[a]			2015–2016			2014-2015 to 2015-2016
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP[b]	Adopting CEP	Percentage Adopting CEP of Total Eligible	Change in Number Adopting CEP
Alabama	122	31	25%	121	36	30%	5
Alaska	32	18	56%	30	21	70%	3
Arizona	91	29	32%	271	56	21%	27
Arkansas	159	2	1%	180	18	10%	16
California	280	28	10%	236	40	17%	12
Colorado	59	8	14%	71	14	20%	6
Connecticut	27	8	30%	39	14	36%	6
Delaware	31	23	74%	32	24	75%	1
District of Columbia	45	33	73%	49	38	78%	5
Florida	167	61	37%	211	102	48%	41
Georgia	136	72	53%	163	93	57%	21
Guam[c]	NA	NA	NA	NA	1	NA	NA
Hawaii	12	6	50%	14	11	79%	5
Idaho	59	12	20%	52	19	37%	7
Illinois	445	131	29%	585	195	33%	64
Indiana	103	30	29%	152	36	24%	6
Iowa	67	13	19%	95	17	18%	4
Kansas	64	5	8%	61	10	16%	5
Kentucky	166	104	63%	171	137	80%	33
Louisiana	101	44	44%	108	63	58%	19
Maine	NA	7	NA	79	16	20%	9
Maryland	32	5	16%	31	11	35%	6
Massachusetts	141	22	16%	136	48	35%	26
Michigan	337	182	54%	412	190	46%	8
Minnesota	183	35	19%	210	57	27%	22
Mississippi	120	42	35%	139	50	36%	8
Missouri	228	75	33%	235	82	35%	7
Montana	48	39	81%	64	47	73%	8
Nebraska	29	1	3%	26	4	15%	3
Nevada	10	3	30%	9	5	56%	2
New Hampshire	24	0	0%	25	2	8%	2
New Jersey	159	28	18%	178	50	28%	22
New Mexico	104	53	51%	131	93	71%	40
New York[d]	602	138	23%	720	186	26%	48

TABLE 1

Community Eligibility Provision (CEP) Take-Up in School Districts for School Years 2014–2015 and 2015–2016

State	2014–2015[a]			2015–2016			2014-2015 to 2015-2016
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP[b]	Adopting CEP	Percentage Adopting CEP of Total Eligible	Change in Number Adopting CEP
North Carolina	135	54	40%	128	83	65%	29
North Dakota	25	16	64%	17	17	100%	1
Ohio[c]	NA	230	NA	NA	254	NA	24
Oklahoma	NA	18	NA	344	53	15%	35
Oregon	139	51	37%	116	68	59%	17
Pennsylvania[e]	259	94	36%	274	141	51%	47
Rhode Island	14	1	7%	13	2	15%	1
South Carolina	80	33	41%	89	42	47%	9
South Dakota	60	23	38%	43	26	60%	3
Tennessee	157	86	55%	156	97	62%	11
Texas	589	143	24%	571	171	30%	28
Utah	22	5	23%	15	6	40%	1
Vermont	30	11	37%	37	17	46%	6
Virginia	90	12	13%	89	26	29%	14
Washington	81	33	41%	158	50	32%	17
West Virginia	54	39	72%	54	46	85%	7
Wisconsin	215	76	35%	183	91	50%	15
Wyoming	5	3	60%	8	3	38%	0
Totals[f]	**6,138**	**2,216**	**32%**	**7,3316**	**2,979**	**37%**	**763**

a. For the 2015–2016 data, school districts are defined as eligible for CEP if they include at least one school with an ISP of 40 percent or higher. In the 2014–2015 data, school districts were defined as eligible for community eligibility if they included at least one school with an ISP of 40 percent or higher, or at least one school that adopted community eligibility, regardless of its ISP. For the full notes on the 2014–2015 data collection, see Zoë Neuberger, Becca Segal, Catlin Nchako, and Kathleen Masterson, "Take up of Community Eligibility This School Year," Center on Budget and Policy Priorities, February 25, 2015, http://www.cbpp.org/research/take-up-of-community-eligibility-this-school-year.

b. There are some states where substantial changes occurred between the number of schools on the 2014-2015 list of eligible schools and the 2015-2016 list, creating the appearance of a more substantial change in take-up than what actually occurred. In Washington and Arizona, the states' data collection methodology changed. Florida and New York expanded their use of Medicaid data for direct certification, which improved their ability to identify low-income students and increased the pool of schools that were eligible for community eligibility. Oregon corrected a mistake in the methodology used to generate last year's list of eligible schools.

c. Guam and Ohio did not publish a list of eligible schools for 2015–2016. No 2014–2015 data were collected for Guam.

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

e. The list of eligible and adopting schools in Pennsylvania is drawn from an April 1, 2016 email from state staff; the ISPs for those schools is drawn from the May 2015 published list and the September 2015 list provided to USDA.

f. The 2014–2015 national percentage of districts adopting community eligibility excludes Maine, Ohio, and Oklahoma because they did not publish lists of eligible schools. For 2015–2016, Guam and Ohio are excluded from the national percentage of districts adopting community eligibility because they did not publish a list of eligible schools, but they are included in the total number of adopting districts.

Source: CBPP and FRAC analysis of data on eligible schools and districts published by state child nutrition agencies in May 2015 and data on schools and districts adopting community eligibility collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016. School districts may have had data that were more recent or complete than that published in May 2015, on which eligibility was based, or additional schools may have participated as part of an eligible group.

TABLE 2

Community Eligibility Provision (CEP) Take-Up in Eligible Schools for School Years 2014–2015 and 2015–2016

State	2014–2015[a]			2015–2016			2014-2015 to 2015-2016
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP[b]	Adopting CEP	Percentage Adopting CEP of Total Eligible	Change in Number Adopting CEP
Alabama	818	347	42%	840	392	47%	45
Alaska	168	123	73%	180	137	76%	14
Arizona	237	73	31%	733	133	18%	60
Arkansas	401	4	1%	492	57	12%	53
California[c]	1,106	208	19%	875	651	74%	443
Colorado	236	34	14%	416	82	20%	48
Connecticut	208	133	64%	280	212	76%	79
Delaware	128	96	75%	132	107	81%	11
District of Columbia	168	125	74%	178	155	87%	30
Florida	2,070	548	26%	2,561	831	32%	283
Georgia	1,075	589	55%	1,053	700	66%	111
Guam[d]	NA	NA	NA	NA	27	NA	NA
Hawaii	81	6	7%	109	25	23%	19
Idaho	179	50	28%	169	88	52%	38
Illinois	1,877	1,041	55%	2,264	1,322	58%	281
Indiana	447	214	48%	606	253	42%	39
Iowa	234	78	33%	315	110	35%	32
Kansas	258	18	7%	262	64	24%	46
Kentucky	889	611	69%	998	804	81%	193
Louisiana	897	335	37%	919	484	53%	149
Maine	NA	21	NA	170	59	35%	38
Maryland	396	25	6%	391	227	58%	202
Massachusetts	729	294	40%	756	462	61%	168
Michigan	1,018	625	61%	1,164	662	57%	37
Minnesota	358	56	16%	402	125	31%	69
Mississippi	539	257	48%	579	298	51%	41
Missouri	695	298	43%	670	330	49%	32
Montana	119	93	78%	155	127	82%	34
Nebraska	95	2	2%	112	9	8%	7
Nevada	158	13	8%	194	36	19%	23
New Hampshire	53	0	0%	51	2	4%	2
New Jersey	570	197	35%	651	227	35%	30
New Mexico	551	343	62%	576	429	74%	86
New York[e]	2,252	1,246	55%	3,585	1,351	38%	105
North Carolina	1,341	648	48%	1,285	752	59%	104
North Dakota	36	23	64%	24	24	100%	1
Ohio[d]	NA	739	NA	NA	842	NA	103
Oklahoma	NA	100	NA	864	184	21%	84

TABLE 2

Community Eligibility Provision (CEP) Take-Up in Eligible Schools for School Years 2014–2015 and 2015–2016

State	2014–2015[a] Eligible for CEP	2014–2015[a] Adopting CEP	2014–2015[a] Percentage Adopting CEP of Total Eligible	2015–2016 Eligible for CEP[b]	2015–2016 Adopting CEP	2015–2016 Percentage Adopting CEP of Total Eligible	2014-2015 to 2015-2016 Change in Number Adopting CEP
Oregon	675	262	39%	476	340	71%	78
Pennsylvania[f]	1,036	646	62%	1,084	795	73%	149
Rhode Island	98	1	1%	96	10	10%	9
South Carolina	588	226	38%	694	348	50%	122
South Dakota	231	142	61%	178	109	61%	(33)
Tennessee	1,205	862	72%	1,204	924	77%	62
Texas	3,591	1,477	41%	3,396	1,665	49%	188
Utah	68	22	32%	55	28	51%	6
Vermont	64	32	50%	94	56	60%	24
Virginia	444	87	20%	462	206	45%	119
Washington	393	122	31%	599	172	29%	50
West Virginia	475	369	78%	495	428	86%	59
Wisconsin	688	348	51%	610	381	62%	33
Wyoming	9	5	56%	13	5	38%	0
Totals[g]	**30,812**	**14,214**	**45%**	**34,467**	**18,247**	**50%**	**4,033**

a. For the 2015–2016 data, schools are defined as eligible for community eligibility if their ISP is 40 percent or higher. In the 2014–2015 data, schools were defined as eligible for community eligibility if they had an ISP of 40 percent or higher, or if they adopted community eligibility. For a full explanation of the 2014–2015 data collection, see Zoë Neuberger, Becca Segal, Catlin Nchako, and Kathleen Masterson, "Take up of Community Eligibility This School Year," Center on Budget and Policy Priorities, February 25, 2015, http://www.cbpp.org/research/take-up-of-community-eligibility-this-school-year.

b. There are some states where substantial changes occurred between the number of schools on the 2014-2015 list of eligible schools and the 2015-2016 list, creating the appearance of a more substantial change in take-up than what actually occurred. In Washington and Arizona, the states' data collection methodology changed. Florida and New York expanded their use of Medicaid data for direct certification, which improved their ability to identify low-income students and increased the pool of schools that were eligible for community eligibility. Oregon corrected a mistake in the methodology used to generate last year's list of eligible schools.

c. There are 339 schools in the Los Angeles Unified School District that adopted community eligibility in March 2016. ISPs for these schools are not yet available.

d. Guam and Ohio did not publish a list of eligible schools for 2015–2016. No 2014–2015 data were collected for Guam.

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

f. The list of eligible and adopting schools in Pennsylvania is drawn from an April 1, 2016 email from state staff; the ISPs for those schools is drawn from the May 2015 published list and the September 2015 list provided to USDA.

g. The 2014–2015 national percentage of schools adopting community eligibility excludes Maine, Ohio, and Oklahoma. For 2015–2016, Guam and Ohio are excluded from the national percentage of districts adopting community eligibility because they did not publish a list of eligible schools, but they are included in the total number of adopting schools and in the total student enrollment in community eligibility schools.

Source: CBPP and FRAC analysis of data on eligible schools and districts, published by state child nutrition agencies in May 2015, and data on schools and districts adopting community eligibility, collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016. School districts may have had data that was more recent or complete than that published in May 2015, on which eligibility was based, or additional schools may have participated as part of an eligible group.

TABLE 3

Community Eligibility Provision (CEP) Take-Up in Highest-Poverty Schools for School Years 2014–2015 and 2015–2016

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

State	2014–2015[a]			2015–2016			2014-2015 to 2015-2016
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP[b]	Adopting CEP	Percentage Adopting CEP of Total Eligible	Change in Number Adopting CEP
Alabama	364	234	64%	283	184	65%	(50)
Alaska	82	65	79%	113	92	81%	27
Arizona	49	37	76%	224	45	20%	8
Arkansas	96	3	3%	124	13	10%	10
California[c]	91	17	19%	190	151	79%	134
Colorado	37	4	11%	61	13	21%	9
Connecticut	83	71	86%	32	19	59%	(52)
Delaware	48	41	85%	41	34	83%	(7)
District of Columbia	73	63	86%	116	113	97%	50
Florida	1,033	423	41%	1,345	555	41%	132
Georgia	379	338	89%	475	410	86%	72
Guam[d]	NA	NA	NA	NA	9	NA	NA
Hawaii	22	2	9%	42	14	33%	12
Idaho	22	10	45%	11	8	73%	(2)
Illinois[e]	NA	NA	NA	NA	992	NA	NA
Indiana	170	123	72%	255	133	52%	10
Iowa	71	46	65%	111	83	75%	37
Kansas	65	13	20%	58	21	36%	8
Kentucky	349	320	92%	484	441	91%	121
Louisiana	456	225	49%	470	316	67%	91
Maine	NA	1	NA	22	15	68%	14
Maryland	176	13	7%	227	204	90%	191
Massachusetts	414	207	50%	475	391	82%	184
Michigan	493	444	90%	612	495	81%	51
Minnesota	202	44	22%	205	109	53%	65
Mississippi	246	173	70%	288	206	72%	33
Missouri	277	181	65%	272	183	67%	2
Montana	33	30	91%	52	50	96%	20
Nebraska	27	2	7%	23	7	30%	5
Nevada	21	10	48%	39	28	72%	18
New Hampshire	8	0	0%	5	0	0%	0
New Jersey	180	119	66%	248	165	67%	46
New Mexico	254	188	74%	232	202	87%	14
New York[f]	1,301	867	67%	2,394	952	40%	85
North Carolina	488	330	68%	500	434	87%	104
North Dakota	17	16	94%	17	17	100%	1
Ohio[d]	NA	NA	NA	NA	573	NA	NA
Oklahoma	NA	NA	NA	227	48	21%	NA
Oregon	223	114	51%	144	135	94%	21

TABLE 3

Community Eligibility Provision (CEP) Take-Up in Highest-Poverty Schools for School Years 2014–2015 and 2015–2016

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

State	2014–2015[a]			2015–2016			2014-2015 to 2015-2016
	Eligible for CEP	Adopting CEP	Percentage Adopting CEP of Total Eligible	Eligible for CEP[b]	Adopting CEP	Percentage Adopting CEP of Total Eligible	Change in Number Adopting CEP
Pennsylvania[g]	538	430	80%	586	544	93%	114
Rhode Island	41	0	0%	38	9	24%	9
South Carolina	250	122	49%	289	217	75%	95
South Dakota	NA	NA	NA	158	109	69%	NA
Tennessee	507	442	87%	545	513	94%	71
Texas	1,277	778	61%	1,296	863	67%	85
Utah	16	9	56%	6	3	50%	(6)
Vermont	16	11	69%	21	10	48%	(1)
Virginia	120	53	44%	143	126	88%	73
Washington	141	69	49%	163	100	61%	31
West Virginia	63	54	86%	26	22	85%	(32)
Wisconsin	349	277	79%	360	325	90%	48
Wyoming	2	2	100%	3	2	67%	0
Totals	**11,171**	**7,021**	**63%**	**14,051**[h]	**10,703**[h]	**65%**[h]	**3,682**

a. For the 2014–2015 data, the national percentage of schools with ISPs of 60 percent or higher adopting community eligibility excludes the five states for which school ISP categories could not be determined: Illinois, Maine, Ohio, Oklahoma, and South Dakota. For a full explanation of the 2014–2015 data collection, see Zoë Neuberger, Becca Segal, Catlin Nchako, and Kathleen Masterson, "Take up of Community Eligibility This School Year," Center on Budget and Policy Priorities, February 25, 2015, http://www.cbpp.org/research/take-up-of-community-eligibility-this-school-year.

b. There are some states where substantial changes occurred between the number of schools on the 2014-2015 list of eligible schools and the 2015-2016 list, creating the appearance of a more substantial change in take-up than what actually occurred. In Washington and Arizona, the states' data collection methodology changed. Florida and New York expanded their use of Medicaid data for direct certification, which improved their ability to identify low-income students and increased the pool of schools that were eligible for community eligibility. Oregon corrected a mistake in the methodology used to generate last year's list of eligible schools.

c. There are 339 schools in the Los Angeles Unified School District that adopted community eligibility in March 2016. ISPs for these schools are not yet available.

d. Guam and Ohio did not publish a list of eligible schools for 2015–2016. No 2014–2015 data were collected for Guam.

e. For 2015–2016, Illinois provided ISP categories, not actual ISP data, for non-adopting schools. Consequently, the number of highest- poverty schools could not be determined.

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

g. The list of eligible and adopting schools in Pennsylvania is drawn from an April 1, 2016 email from state staff; the ISPs for those schools is drawn from the May 2015 published list and the September 2015 list provided to USDA.

h. For 2015–2016, Guam and Ohio are excluded from the national percentage of highest-poverty schools adopting community eligibility because they did not publish a list of eligible schools, but they are included in the total number of highest-poverty schools adopting community eligibility. Illinois is excluded from the national percentage of highest-poverty schools adopting community eligibility because it did not publish ISP data for non-adopting schools, but it is included in the total number of highest-poverty schools adopting community eligibility.

Source: CBPP and FRAC analysis of data on eligible schools and districts, published by state child nutrition agencies in May 2015, and data on schools and districts adopting community eligibility, collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016. School districts may have had data that was more recent or complete than that published in May 2015, on which eligibility was based, or additional schools may have participated as part of an eligible group.

TABLE 4

Student Enrollment at Schools Adopting the Community Eligibility Provision (CEP) for School Years 2014-2015 and 2015-2016

	Student Enrollment at Schools Adopting CEP 2014-2015	Student Enrollment at Schools Adopting CEP 2015-2016	Change in Student Enrollment at Schools Adopting CEP (2014-2015 to 2015-2016)
Alabama	180,789	196,802	16,013
Alaska	27,666	29,234	1,568
Arizona	30,763	55,048	24,285
Arkansas	791	20,060	19,269
California	113,513	435,900	322,387
Colorado	12,455	34,920	22,465
Connecticut	66,524	105,547	39,023
Delaware	47,013	51,524	4,511
District of Columbia	44,485	54,061	9,576
Florida	274,071	474,006	199,935
Georgia	354,038	420,383	66,345
Guam	NA	20,149	NA
Hawaii	2,640	4,650	2,010
Idaho	18,828	32,299	13,471
Illinois	552,751	672,831	120,080
Indiana	96,604	117,187	20,583
Iowa	32,103	46,021	13,918
Kansas	5,992	19,641	13,649
Kentucky	279,144	385,043	105,899
Louisiana	146,141	217,496	71,355
Maine	5,284	17,977	12,693
Maryland	7,624	94,496	86,872
Massachusetts	134,071	200,948	66,877
Michigan	266,249	275,579	9,330
Minnesota	20,688	49,944	29,256
Mississippi	136,095	148,781	12,686
Missouri	106,126	111,319	5,193
Montana	15,802	21,161	5,359
Nebraska	180	2,425	2,245
Nevada	7,917	15,970	8,053
New Hampshire	0	644	644
New Jersey	99,840	107,277	7,437
New Mexico	119,300	149,057	29,757
New York	505,859	528,748	22,889
North Carolina	310,850	357,307	46,457
North Dakota	5,284	5,661	377
Ohio	305,451	354,727	49,276
Oklahoma	43,433	66,323	22,890
Oregon	103,601	129,635	26,034
Pennsylvania	327,573	394,630	67,057
Rhode Island	838	6,531	5,693

TABLE 4

Student Enrollment at Schools Adopting the Community Eligibility Provision (CEP) for School Years 2014-2015 and 2015-2016

	Student Enrollment at Schools Adopting CEP 2014-2015	Student Enrollment at Schools Adopting CEP 2015-2016	Change in Student Enrollment at Schools Adopting CEP (2014-2015 to 2015-2016)
South Carolina	111,453	173,364	61,911
South Dakota	13,056	14,626	1,570
Tennessee	417,165	436,821	19,656
Texas	941,262	1,015,384	74,122
Utah	7,019	8,565	1,546
Vermont	7,386	12,751	5,365
Virginia	42,911	99,404	56,493
Washington	53,369	69,432	16,063
West Virginia	124,978	145,057	20,079
Wisconsin	133,232	146,330	13,098
Wyoming	1,255	1,255	0
Totals	**6,661,462**	**8,554,931**	**1,893,469**

Source: CBPP and FRAC analysis of data on eligible schools and districts, published by state child nutrition agencies in May 2015, and data on schools and districts adopting community eligibility, collected directly by USDA, CBPP, and FRAC from state agencies from September 2015 through April 2016. School districts may have had data that was more recent or complete than that published in May 2015, on which eligibility was based, or additional schools may have participated as part of an eligible group. No 2014–2015 data were collected for Guam.

Appendix 2: Resources to Support Community Eligibility Implementation

CBPP and FRAC have worked closely to monitor implementation of community eligibility and develop resources to support states and school districts as they consider adopting it. CBPP and FRAC both have community eligibility websites, which include resources explaining all facets of community eligibility, including state resources.[16] USDA's Food and Nutrition Service website also has useful materials, webinars, and resources.[17]

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

CBPP and FRAC's guide for state and local anti-hunger and education advocates outlines key steps they can take this spring to ensure that high-poverty schools have the information needed to consider community eligibility.[18] Additional resources that are especially helpful to school districts considering community eligibility and stakeholders working with districts include:

- Report on first two years of community eligibility
- Report on community eligibility in 2014–2015 school year
- Database of eligible and adopting schools
- Implications of community eligibility for Title I (summary)
- Community eligibility and E-rate program
- Alternatives to school meal applications for community eligibility schools
- Implementation guide

[16] See http://frac.org/federal-foodnutrition-programs/national-school-lunch-program/community-eligibility/ and http://www.cbpp.org/community-eligibility-making-schools-hunger-free.

[17] See http://www.fns.usda.gov/school-meals/community-eligibility-provision.

[18] See http://www.cbpp.org/files/2-20-15fa.pdf.

Appendix 3: Data Collection and Analysis

CBPP and FRAC obtained information on schools that have adopted community eligibility as of September 1, 2015 directly from USDA and state education agencies. Between September 2015 and January 2016, USDA collected these data — specifically, the school's name, school district, ISP, participation as part of a group or a whole district, and enrollment — and provided this information to CBPP and FRAC. CBPP and FRAC directly followed up with state education agencies between January and April of 2016 for data clarifications and to obtain missing data.

Under federal law, states were required to publish, by May 1, 2015, a list of schools and districts with ISPs of at least 40 percent and those with ISPs between 30 and 40 percent (near-eligible schools and districts). We compared these published lists to the lists of adopting schools, and compiled a universe of eligible schools and districts that included schools adopting community eligibility in the 2015–2016 school year. When compiling the universe of eligible schools, we treated a district as eligible if it contained at least one eligible school. We treated a school as eligible if it appeared on a state's published list of eligible schools. Schools that were missing from a state's list of eligible schools, but appeared on its list of adopting schools and were eligible based on their ISPs, were treated as eligible. We relied on the data from the list of participating schools, as it provided more recent data than the list of eligible schools published last year.

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

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

Not all states published or provided actual ISPs, or published a list of eligible schools. For states that did not, we did not calculate the share of schools with ISPs of 60 percent or higher that have adopted community eligibility.

For most adopting schools, the lists obtained from USDA and state education agencies indicated whether the district elected to adopt community eligibility partially or districtwide, and whether the school was part of an adopting group.

States provided group-level ISP data for adopting schools. In the few states where both group-level and school-level data were provided, we used group-level data and categorized them accordingly.