



# Community Eligibility: The Key to Hunger-Free Schools

School Year 2019–2020

May 2020 ■ [www.FRAC.org](http://www.FRAC.org)

EMBARGOED UNTIL  
**WEDNESDAY, MAY 27, 2020**  
12:01 a.m., Eastern



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### Acknowledgments

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This report was written by Crystal FitzSimons, Alison Maurice, and Melissa Osbourne. The findings and conclusions presented in this report are those of FRAC alone.

### About FRAC

The Food Research & Action Center (FRAC) is the leading national organization working for more effective public and private policies to eradicate domestic hunger and undernutrition. For more information about FRAC, or to sign up for FRAC's *Weekly News Digest* and monthly *Meals Matter: School Breakfast Newsletter*, visit [frac.org](http://frac.org).

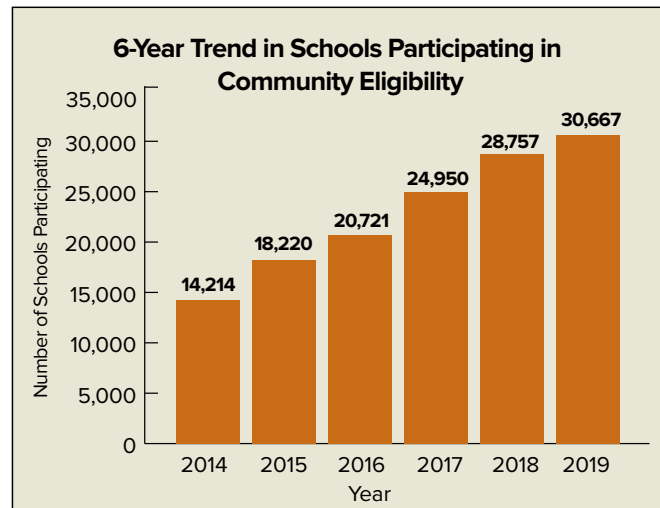


# Executive Summary

**T**he Community Eligibility Provision allows high-poverty schools to offer breakfast and lunch at no charge to all students. Created through the Healthy, Hunger-Free Kids Act, participation in community eligibility has grown each year since it became available nationwide in the 2014–2015 school year. In the 2019–2020 school year, another significant increase in participation means that 1 in 3 of the 91,000 schools<sup>1</sup> that operate the School Breakfast Program and National School Lunch Program do so through community eligibility.

Schools that participate in community eligibility often see increased participation in school meals, allowing more students to experience the many educational and health benefits linked to school meal participation. Schools no longer have to collect and process school meal applications, which reduces administrative costs and paperwork, allowing school nutrition staff to focus more on offering healthy, appealing meals. Moreover, offering meals at no charge to all students eliminates the stigma from the perception that school meals are only for low-income children, and facilitates the implementation of “breakfast after the bell” service models, such as breakfast in the classroom, which further boosts participation.

As more schools continue to experience and share the academic, health, and administrative benefits of community eligibility, eligible school districts<sup>2</sup> continue to adopt the provision or expand implementation. The year-after-year gains are not slowing down as participation by school districts rises by more than 9 percent, leading to a corresponding growth in



the number of children attending schools operating community eligibility. Here are just some of the top-level findings in this year’s report:

- 5,133 school districts have one or more schools participating in community eligibility, an increase of 435 school districts, or 9.3 percent, from the 2018–2019 school year;
- 30,667 schools participate in community eligibility, an increase of 1,910 schools, or 6.6 percent, from the prior school year;
- 69 percent of eligible schools participate in community eligibility;<sup>3</sup>
- 14.9 million children attend a school that offers free breakfast and lunch to all students through community eligibility, an increase of nearly 1.3 million children, or 9.2 percent, from the prior school year.

<sup>1</sup>Food Research & Action Center. (2020). *School Breakfast Scorecard School Year 2018–2019*. Available at: [https://frac.org/wp-content/uploads/Breakfast-Scorecard-2018-2019\\_FNL.pdf](https://frac.org/wp-content/uploads/Breakfast-Scorecard-2018-2019_FNL.pdf). Accessed on May 7, 2020.

<sup>2</sup> This report uses the term “school district” to refer to a Local Education Agency (LEA). LEAs include large school districts with hundreds of schools, as well as LEAs with charter schools where the school is often the only one in that LEA.

<sup>3</sup> To participate in community eligibility, approximately two-thirds of the students in the school or school district must live in a low-income household. School districts can implement community eligibility in one school, a group of schools, or districtwide if the school, group of schools, or district has at least 40 percent of its students directly certified to receive free or reduced-price school meals, primarily due to their household’s participation in the Supplemental Nutrition Assistance Program. An analysis by the U.S. Department of Agriculture found that for every 10 children who are certified for free school meals outside of the school meal application process, an additional six would be certified through a school meal application.

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Still, there are many eligible schools that are not participating, even though they stand to benefit from community eligibility. Take-up rates vary substantially across the states. Several factors, including challenges associated with the loss of traditional school meal application data and low rates of direct certification (the latter being the foundation of community eligibility), have hindered widespread adoption in some states and school districts. However, barriers can be overcome with strong state, district, and school-level leadership; hands-on technical assistance from national, state, and local stakeholders; and peer-to-peer learning among districts.

As school districts look ahead to the 2020–2021 school year, community eligibility offers an important opportunity to respond to the economic crisis created by COVID-19. More families are becoming eligible for, and are receiving, Supplemental Nutrition Assistance Program benefits, which will lead to more schools becoming eligible to implement community eligibility, and school breakfast and lunch will be a critical nutrition

support for the millions of children whose families are being impacted by the crisis. The U.S. Department of Agriculture, State child nutrition agencies, and anti-hunger and education advocates can work together to promote community eligibility to newly eligible school districts and to provide technical assistance and support to allow these districts to implement community eligibility successfully and sustainably.



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## About This Report

This report analyzes community eligibility implementation — nationally and for each state and the District of Columbia — in the 2019–2020 school year, and is based on three measures:

- the number of eligible and participating school districts and schools;
- the share of eligible districts and schools that have adopted community eligibility; and
- the number and share of eligible schools that are participating, based on the school's poverty level.

As a companion to this report, the Food Research & Action Center has compiled all data collected in a [database of eligible and participating schools](#) that can be searched by state and school district.

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## How Community Eligibility Works

Community eligibility schools are high-needs schools that offer breakfast and lunch to all students at no charge and use significant administrative savings to offset any additional costs, over and above federal reimbursements, of serving free meals to all. Instead of collecting school meal applications, community eligibility schools are reimbursed for a percentage of the meals served, using a formula based on the percentage of students participating in specific means-tested programs, such as the Supplemental Nutrition Assistance Program (SNAP).

There are many benefits that community eligibility provides to schools and families.

- Schools no longer collect, process, or verify school meal applications, saving significant time and 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 the cafeteria line faster, and ensuring that more children can be served.
- Offering meals at no charge to all students increases participation among all students because it eliminates any perception that the school meals programs are just for the low-income children.
- Schools no longer have to deal with unpaid school meal debt for reduced-price and paid students at the end of the school year, or follow up with families when students do not have money to pay for meals.

### How Schools can Participate

Any district, group of schools in a district, or a school with 40 percent or more “identified students” is eligible to participate. Identified students are comprised of students 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 some states, Medicaid benefits; and

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

School districts may choose to participate school-by-school, districtwide, or group schools at their discretion if the school, school district, or group has an overall identified student percentage (ISP) of 40 percent or higher.

Identified students, whose poverty is shown by participation in other programs, 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 (discussed below) is applied to the ISP. Schools that qualify for community eligibility typically have free and reduced-price percentages of 65–70 percent or higher if traditional school meal applications were collected from student households.

### How Schools are Reimbursed

Although all meals are offered at no charge to all students in schools that participate in community eligibility, federal reimbursements are based on the proportion of low-income children in the school.

The ISP is multiplied by 1.6 to calculate the percentage of meals reimbursed at the federal free rate, and the remainder are reimbursed at the lower paid rate. The 1.6 multiplier was determined by Congress to reflect the ratio of six students certified for free or reduced-price meals with an application for every 10 students certified for free meals without an application. This serves as a proxy for the percentage of students that would be eligible for free and reduced-price meals if the school districts had collected school meal applications. For example, a school with 50 percent identified students would be reimbursed for 80 percent of the meals eaten at the free reimbursement rate ( $50 \times 1.6 = 80$ ), and 20 percent at the paid rate.

## Key Findings for the 2019–2020 School Year

### School District Participation

**Nationally, 5,133 school districts — 57.7 percent of those eligible — are now participating in the Community Eligibility Provision in one or more schools.<sup>4</sup> This is an increase of 435 school districts since the 2018–2019 school year, when 4,698 school districts participated.**

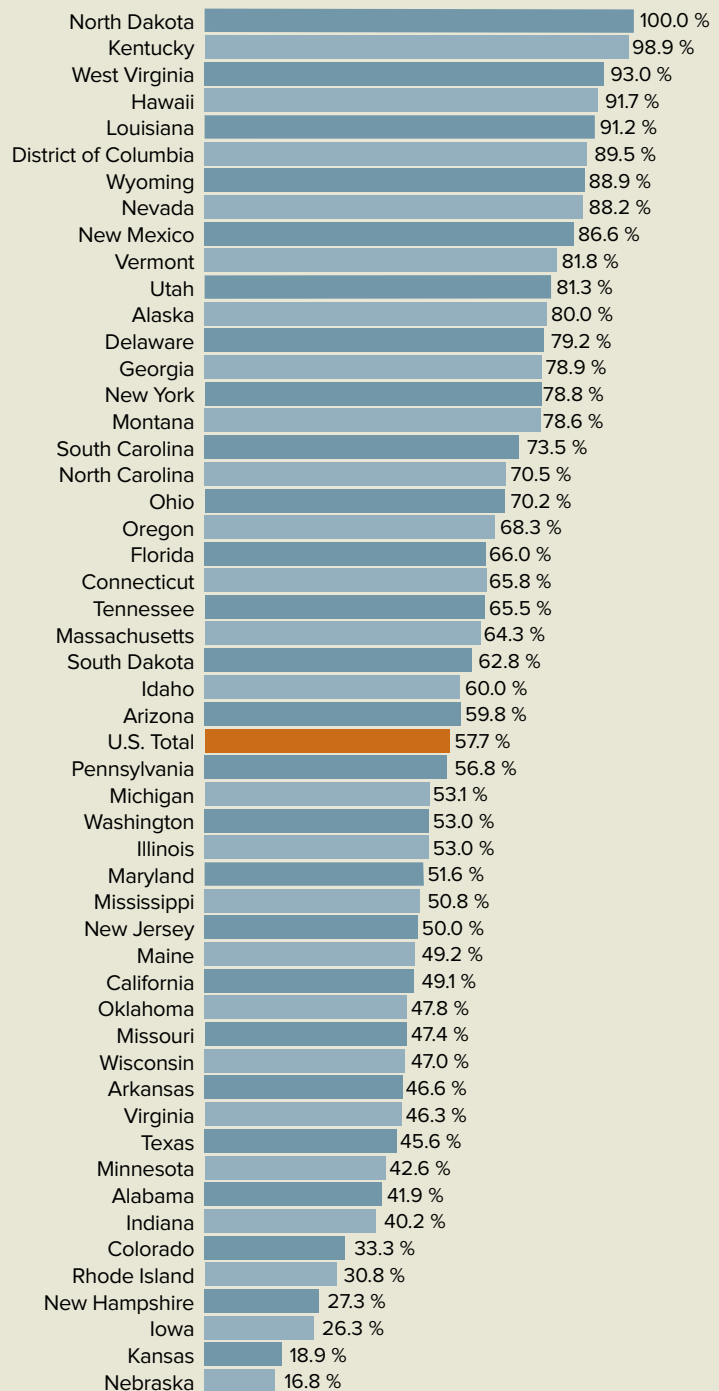
The median state’s take-up rate in school year 2019–2020 for eligible school districts is 60 percent; however, school district take-up rates across the states vary significantly, from 30 percent or lower in Iowa, Kansas, Nebraska, and New Hampshire to over 90 percent in Hawaii, Kentucky, Louisiana, North Dakota, and West Virginia.

Several states have seen significant increases in the 2019–2020 school year. Texas experienced the largest growth in the number of school districts participating, increasing by 82 school districts. California, New York, and Michigan followed in school district participation growth by adding 45, 50, and 68 school districts, respectively.

Eleven states and the District of Columbia have had small decreases — between one and five — in the number of districts implementing community eligibility in the 2019–2020 school year. Of those that have had fewer school districts participating in community eligibility, eight have had a decrease in the number of eligible school districts. Hawaii has had the largest decrease in participating school districts — five school districts — but six school districts in the state lost eligibility, resulting in the percentage of eligible districts participating increasing from 88.9 percent to 91.7 percent.

<sup>4</sup> 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 requirements related to the published lists, see <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP17-2019os.pdf>.

### Percentage of Eligible School Districts Adopting Community Eligibility in School Year 2019–2020



A primary factor in the continued growth in participation is the ability of school districts to observe the benefits of community eligibility in other school districts. As more school districts overcome the perceived barrier that community eligibility will change Title I funding allocations dramatically, and those in states that require alternative income applications for state education funding and other purposes work through the challenges of collecting alternative income applications, more school districts have been adopting this provision. (See page 13 for best practices for navigating the loss of school meal applications.)

Despite the growth in the 2019–2020 school year, states need to continue to improve their direct certification

systems to ensure that school districts can maintain the identified student percentages (ISP) necessary to become and remain eligible for community eligibility, and to ensure that it continues to be a viable financial option for school districts. In the U.S. Department of Agriculture’s latest [report on state direct certification rates](#), 23 states did not meet the required benchmark of directly certifying 95 percent of children living in households that participated in the Supplemental Nutrition Assistance Program for free school meals, pointing to missed opportunities for school districts to increase their ISPs to facilitate easier community eligibility implementation. (See page 12 for best practices for directly certifying children.)

## Overcoming Barriers

After six years of nationwide availability, the majority of eligible school districts and schools have overcome the barriers to participation in community eligibility, but work still remains to allow additional schools to adopt community eligibility, including improving direct certification, measuring poverty without school meal applications, and overcoming low identified student percentages (ISP).

- **Improving Direct Certification:** Direct certification rates determine a school's eligibility and the level of reimbursement the school will receive, which makes having strong direct certification systems for the Supplemental Nutrition Assistance Program, as well as identifying all children who are automatically eligible for free school meals outside of the regular school meal application, critical for allowing schools to implement community eligibility. (See page 12 for more information.)
- **Measuring Poverty Without School Meal Applications:** The percentage of students certified

for free or reduced-price school meals has long been used for different types of education funding at the federal and state level, and students’ individual eligibility for free or reduced-price school meals been used to track student outcomes. Community eligibility has required federal, state, and local educational officials to identify additional ways to measure poverty. (See page 13 for more information.)

- **Overcoming Low ISPs.** The ISP determines the level of reimbursement that a school will receive, which makes it hard for eligible schools that have lower ISPs to adopt community eligibility. There are strategies that can allow schools with lower ISPs to successfully adopt, which helped the number of schools participating with ISPs between 40 and 50 percent in the 2019–2020 school year grow by 940 schools or 44.5 percent. (See page 10 for the best practices that are allowing many schools with lower ISPs to implement community eligibility.)

## School Participation

In the 2019–2020 school year, there are **30,667** schools participating in community eligibility, including schools from all 50 states and the District of Columbia. Overall school participation in community eligibility increased by **1,910** schools since the 2018–2019 school year. In the 2019–2020 school year, **69 percent** of all eligible schools are participating in community eligibility nationally, with a median state take-up rate of **70.9 percent**.

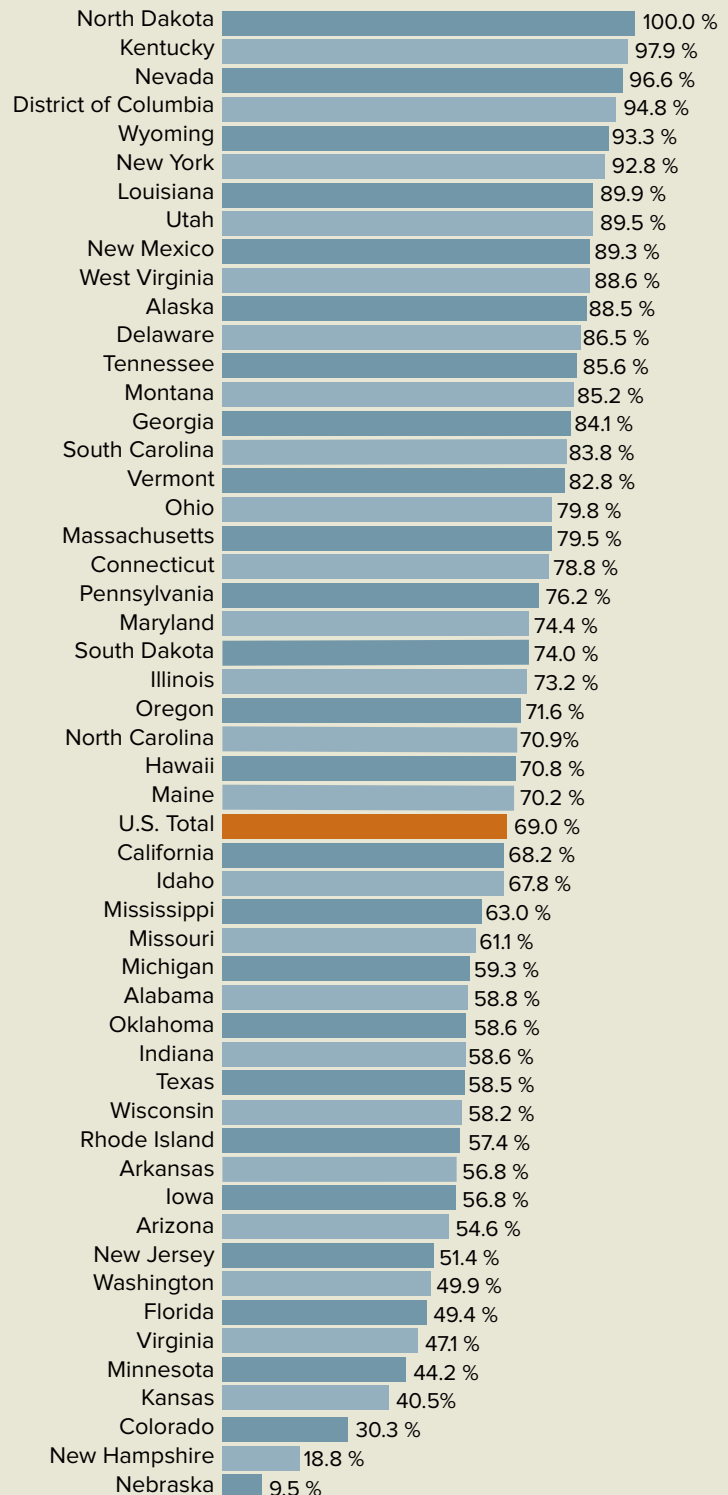
Among the states, the percentage of eligible and participating schools varies significantly. Five states and the District of Columbia have 90 percent or more of their eligible schools participating. Eleven states have 80 percent or more of their eligible schools participating. Alternatively, Nebraska, New Hampshire, and Colorado had less than 40 percent of their eligible schools participating: 9.5 percent, 18.8 percent, and 30.3 percent respectively.

Thirty-one states and the District of Columbia have seen an increase in the number of schools participating in community eligibility, and four states — Alaska, Colorado, Nebraska, and South Dakota — maintained the same number of community eligibility schools during the 2019–2020 school year. Fifteen states have experienced a decrease in the number of schools participating in the program, with 13 of these states experiencing a decrease in the number of schools eligible to implement community eligibility. The largest decreases were in New York<sup>5</sup> (84 schools), Mississippi (73 schools) and Idaho (21 schools).

Texas had the largest increase, with 534 more schools implementing community eligibility

<sup>5</sup> New York’s decrease in school participation was driven by school consolidation in the school district New York City Chancellor’s Office, and did not cause a corresponding decrease in the number of children attending community eligibility schools.

## Percentage of Eligible Schools Adopting Community Eligibility in School Year 2019–2020



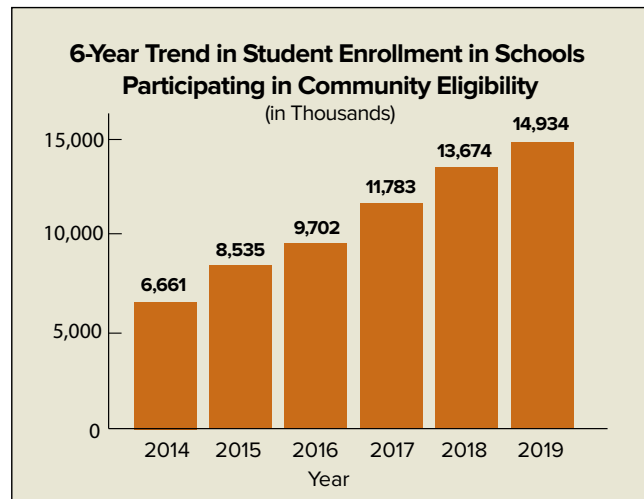


since the 2018–2019 school year. California, Michigan, Nevada, and Indiana added 442, 154, 149, and 100 more schools, respectively. Smaller states with fewer eligible schools also have made strong progress, including Iowa, which increased by 20 schools, and Rhode Island, which added 21 schools.

Despite significant growth nationally and in most states, some states still have very low take-up rates compared to the national average. In eight states, less than 50 percent of all eligible schools are participating in community eligibility. Nebraska, New Hampshire, and Colorado have the lowest take-up rates for eligible schools, with less than 1 in 3 eligible schools participating. For some states with low school participation rates, improvement to direct certification systems at the state and school district level can help increase the number of schools eligible for the provision by more accurately identifying automatically the number of students eligible to receive free school meals without a school meals application.

## Student Enrollment

The reach of community eligibility is most evident in the number of students impacted. In the 2019–2020 school year, 14.9 million students are being offered free breakfast and lunch at school through the Community Eligibility Provision; this is up from 13.7 million in the 2018–2019 school year. California and Texas have the most children attending schools that are participating in community eligibility, approximately 1.9 million in each state. Nationally, nearly 1 in 4 students attending a school that is participating in community eligibility lives in California or Texas.



Thirty-two states have seen increases in the number of students in community eligibility schools in the 2019–2020 school year. As would be expected, the states that have seen the biggest increases in the number of participating schools this year also have seen the largest enrollment increases. Texas added more than 307,000 students, and California added more than 254,000 students. Nevada and New York had significant increases in the number of students as well, nearly 118,000 and nearly 96,000 respectively.

## School Participation by Poverty Level

All schools that qualify for community eligibility are considered to be high needs, but a school's ability to implement community eligibility successfully — and maintain financial viability — typically improves when its ISP is higher. For this report, the Food Research & Action Center examined the number of schools participating in each state, based on their ISP as a proxy for the school's poverty level.

Schools with higher ISPs receive the free reimbursement rate for more meals, which makes community eligibility a more financially viable option. As a result, schools with ISPs of 60 percent and above — those that receive the free reimbursement rate for 100 percent or nearly 100 percent of their meals — are more likely to participate in community eligibility than schools with lower ISPs; that has been the case since the program became available nationwide.

Nationally, 18,803 schools or 85 percent of all schools with ISPs of 60 percent and above are participating in community eligibility, well above the overall eligible school participation rate of 69 percent. In 18 states, more than 90 percent of such schools are participating, and 15 additional states have more than 80 percent participating. This category of eligible schools with ISPs of 60 percent and above represents 61.3 percent of the schools participating that reported their ISP.

Still, many schools are participating at lower ISPs and this number has grown each year as schools gain a better understanding of the financial savings and educational and health benefits of community eligibility. In the 2019–2020 school year, 3,054, which is 10 percent of all schools participating in community eligibility, have an ISP between 40 and 50 percent; and 8,679 schools, or 28.3 percent, have an ISP between 50 and 60 percent.

**Community Eligibility Provision (CEP)  
 Take-Up Rate by Schools’ Identified Student  
 Percentage for School Year 2019–2020\***

Identified Student Percentage	Eligible Schools	Adopting Schools	Percent Adopting CEP
40 to less than 50 percent	10,003	3,054	30.5 %
50 to less than 60 percent	12,245	8,679	70.9 %
60 percent and above	22,133	18,803	85.0 %

\*Some states did not report ISPs for all of their schools, and some reported ISPs for adopting schools that are below the 40 percent eligibility threshold. These participating schools are not included in the total number of adopting schools by each ISP category. This accounts for the difference between the U.S. total number of adopting schools and the total number of adopting schools by ISP category. For more information, see Table 3.

**Strategies to Make Community Eligibility Work at Lower Identified Student Percentages**

Schools can increase the financial viability of implementing community eligibility at lower identified student percentages by maximizing federal child nutrition funding through strong participation in school breakfast and lunch and other federal child nutrition programs.

Strategies include

- implementing breakfast in the classroom or another innovative school breakfast model to increase participation;
- participating in the [Afterschool Meal Program](#), through the Child and Adult Care Food Program, which provides the free reimbursement rate combined with commodities or cash in lieu of commodities for all suppers and lunches served;
- providing appealing and high-quality meals that offer a variety of options that include items prepared in-house, reflect students’ cultural tastes, and incorporate locally sourced products;
- tracking daily participation to identify unpopular items and avoid menu fatigue, allowing districts to adjust menus quickly to ensure strong participation;
- engaging students through taste tests, student surveys, and student-run school gardens to encourage participation; and
- promoting school meals to students, parents, and the community-at-large by distributing information through social media about the availability of school meals at no charge, placing banners about the program throughout the school, running contests, and working with local media to highlight the program.

## Expansion in the 2020–2021 School Year

The economic crisis being driven by COVID-19 is dramatically increasing the number of families in need. In a survey conducted by the Pew Research Center,<sup>6</sup> 43 percent of U.S. adults reported that they or someone in their household has lost a job or has had their pay cut due to COVID-19. The pandemic's ripple effects are leading many families to apply for the Supplemental Nutrition Assistance Program and other programs that will make them categorically eligible for free school meals, which will increase some schools and school districts' identified student percentages (ISP). A higher ISP makes community eligibility a more viable option. With schools across the country closed and school nutrition departments still working hard to provide meals to their students at sites in their community, state

leadership will be critical, and eligible school districts will need additional support and guidance to ensure that they are able to adopt community eligibility.

■ **Direct Certification:** Conducting direct certification through June — at a time when school districts are normally wrapping up the school year — will be critical to identify the newly eligible students who can be directly certified for free school meals. Otherwise, many districts that are facing a significant increase in need among their students will be unable to adopt community eligibility. State agencies can work closely with school districts and provide additional technical assistance and support for these direct certification efforts. (See page 12 for additional information on how to improve direct certification systems.)

■ **Outreach:** Community eligibility outreach generally starts in February, and, in a normal year, would continue until June 30, when school districts are required to notify their State agencies of their intention to adopt community eligibility in the upcoming school year. The U.S. Department of Agriculture's nationwide waiver to extend the deadline to August 31 is designed to give districts adequate time to consider adopting community eligibility, but outreach efforts have been delayed due to COVID-19. Comprehensive outreach and promotion of community eligibility by State agencies and partners will need to ratchet up in May and June, and will need to continue through the summer.

■ **Technical Assistance:** With many school districts expected to become newly eligible for community eligibility, additional technical assistance and resources will be needed to support them as they determine if they will adopt community eligibility for

### Community Eligibility Deadlines for the 2020–2021 School Year

In response to COVID-19, the U.S. Department of Agriculture has issued a nationwide waiver to extend the community eligibility deadlines to give states and school districts more time and flexibility to plan for the 2020–2021 school year. The waiver gives states until June 15 to notify school districts that they are eligible or near-eligible for community eligibility, and until June 30 to publish the list of eligible and near-eligible schools. The waiver allows school districts to use data from any time between April 1 and June 30, instead of the normal deadline of April 1. This change allows the identified student percentages to reflect more accurately the poverty within the school district and school. The waiver also gives school districts until August 31 to elect community eligibility for the 2020–2021 school year. States must opt into this waiver. More than 40 states have. Those that have not should strongly consider adopting the waiver to better support their schools and students.<sup>7</sup>

<sup>6</sup> Pew Research Center. (2020). *About Half of Lower-Income Americans Report Household Job or Wage Loss Due to COVID-19*. Available at: <https://www.pewsocialtrends.org/2020/04/21/about-half-of-lower-income-americans-report-household-job-or-wage-loss-due-to-covid-19/>. Accessed on April 28, 2020.

<sup>7</sup> U.S. Department of Agriculture. (2020). *Nationwide Waiver of Community Eligibility Provision Deadlines in the National School Lunch and School Breakfast Programs*. Available at: <https://www.fns.usda.gov/cn/covid-19-cep-deadlines-waiver>. Accessed on May 7, 2020.

the first time. [FRAC's community eligibility resources and webinars](#) can help support school districts as they explore implementing community eligibility.

## Maximizing Direct Certification Rates

Community eligibility bases school breakfast and lunch reimbursements on the percentage of enrolled students who are certified for free school meals without an application, and direct certification is the key component of that, making direct certification the backbone of community eligibility. Direct certification allows school districts to certify automatically children who are enrolled in certain other public benefits programs as eligible for school meals through a data-matching process. The vast majority of “identified students” in community eligibility schools are students who are living in households that are participating in the Supplemental Nutrition Assistance Program (SNAP) and who have been directly certified through data matching at the state or local level. Under current federal law, school districts must perform at least three direct certification data matches each

school year, and states must achieve a benchmark of directly certifying 95 percent of children who are living in SNAP households for free school meals.

In the latest [direct certification state implementation report](#), focused on the 2016–2017 school year, only 28 states achieved the benchmark. Ten states directly certified less than 90 percent of all children in SNAP households, with California, the lowest-performing state, certifying just 74 percent.<sup>8</sup>

Identified student counts also can include children who are directly certified because their household participates in Temporary Assistance for Needy Families (TANF) or the Food Distribution Program on Indian Reservations (FDPIR), or because they are in foster care or Head Start, or receive homeless, runaway, or migrant education services. States that can directly certify virtually all children in SNAP households, as well as expand their direct certification systems to include a variety of other data sources that can help school districts maximize their ISP, help make community eligibility financially viable for more school districts

## Medicaid Direct Certification

The Healthy, Hunger-Free Kids Act of 2010 authorized demonstration projects to use Medicaid data for direct certification. The statute requires that students be enrolled in Medicaid and belong to a family whose income, as defined by Medicaid, is below 133 percent of the Federal Poverty Level<sup>9</sup> in order to use Medicaid data to directly certify a student to receive free school meals. In 2016, the U.S. Department of Agriculture issued a request for proposals for states to be included in a demonstration project that allowed direct certification for free and reduced-price school meals using Medicaid income data. Nearly all of the states participating in one of

the Medicaid direct certification demonstrations continued to increase the number of schools participating in community eligibility or maintained the number of schools that had been using the provision in the 2018–2019 school year.<sup>10</sup>

It is important to note that if a child can be directly certified for free school meals through the Supplemental Nutrition Assistance Program, the Temporary Assistance for Needy Families program, the Food Distribution Program on Indian Reservations, or through foster care, Head Start, or through being migrant or homeless, that certification always will take precedence over Medicaid direct certification.

<sup>8</sup> U.S. Department of Agriculture. (2018). *Direct Certification in the National School Lunch Program: State Implementation Progress Report to Congress — School Year 2015–2016 and School Year 2016–2017*. Available at: <https://www.fns.usda.gov/direct-certification-national-school-lunch-program-report-congress-state-implementation-progress-1>. Accessed on April 28, 2020.

<sup>9</sup> As defined in section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)).

<sup>10</sup> The following states use Medicaid data, along with an income test, to determine categorical eligibility for free school meals: Illinois, Kentucky, New York, and Pennsylvania. The following states use Medicaid data to determine categorical eligibility for both free and reduced-price school meals: California, Connecticut, Florida, Indiana, Iowa, Massachusetts, Michigan, Nebraska, Nevada, Texas, Utah, Virginia, Washington, West Virginia, and Wisconsin.

and schools. Conversely, in states and school districts where direct certification rates are low and their data sources are less robust, a school's poverty level likely is underrepresented by the ISP. As a result, in these states, there will be fewer schools and districts that are eligible for community eligibility, resulting in fewer high-poverty schools adopting the provision, and some schools that do use community eligibility will receive less reimbursement than they should.

States can improve direct certification systems and support community eligibility schools by

- working with appropriate State agency counterparts to incorporate TANF, FDPIR, foster care, homeless, runaway, and migrant student data into state direct certification systems;
- increasing the frequency that school enrollment and program enrollment data are updated and matched against each other (weekly or in real time);
- improving algorithms to incorporate tiered or probabilistic matching to account for nicknames and

## Community Eligibility and Breakfast After the Bell

School breakfast serves just 58 low-income students for every 100 that participate in school lunch.<sup>11</sup> One reason that this participation rate is lower than it should be is that most schools offer school breakfast in the cafeteria before the school day starts. Implementing an innovative school breakfast model, like breakfast in the classroom or “grab and go” breakfast, makes the meal more accessible to students, and has been shown to increase school breakfast participation significantly. Participation also increases when breakfast is offered at no charge to all students. Combining the two approaches yields the largest increase in participation. Under community eligibility, offering breakfast for free and reducing administrative requirements by no longer requiring schools to collect fees or count each meal served by fee category makes it easier to start a breakfast in the classroom or “grab and go” program.

common mistakes, such as inverted numbers in dates of birth or misspelled words;

- developing functionalities to provide partial matches that can be resolved at the local level, including search functions that allow schools to look for new students; and
- conducting SNAP education and offering SNAP application assistance to schools.

For more information on strategies to improve direct certification, read the Food Research & Action Center's [Direct Certification Improves Low-Income Student Access to School Meals](#).

## Measuring Student Poverty Without School Meal Applications

School meal application data (determining eligibility for free or reduced-price meals) has traditionally been used for a variety of purposes in education, as it has been a readily available proxy for poverty. When switching to community eligibility, schools no longer have individual student data because they no longer collect school meal applications. A school district's ability to navigate switching to new poverty measures for broader education funding purposes is often important in the school district being willing to implement community eligibility.

## Title I Funding

Title I Part A of the Elementary and Secondary Education Act provides supplemental federal funding to school districts with high percentages of low-income students. Adopting community eligibility does not impact the amount of Title I funding a school district receives, but many districts allocate Title I funds to individual schools based on National School Lunch Program data (free and reduced-price certified students). In response to confusion regarding how school districts would measure poverty for the purposes of allocating Title I funding among schools, the U.S. Department of Agriculture and the U.S. Department of Education worked closely together to establish policies for community eligibility schools to access federal programs without the need for individual student free and reduced-price eligibility data.

<sup>11</sup> Food Research & Action Center. (2020). *School Breakfast Scorecard School Year 2018–2019*. Available at: [https://frac.org/wp-content/uploads/Breakfast-Scorecard-2018-2019\\_FNL.pdf](https://frac.org/wp-content/uploads/Breakfast-Scorecard-2018-2019_FNL.pdf). Accessed on May 7, 2020.

The U.S. Department of Education’s policy guidance offers school districts numerous options for determining school-by-school Title I allocations, thus allowing districts to use the measure that works best for them.<sup>12</sup> For more information, refer to the Food Research & Action Center’s [Understanding the Relationship Between Community Eligibility and Title I Funding](#).

## State Education Funding

Many state education funding formulas provide additional support to low-income students and their schools that are based on the student’s eligibility for free or reduced-price school meals. Since community eligibility schools no longer collect school meal applications, a number of these states have allowed community eligibility schools to use other data to determine state education funding. Nine states allow community eligibility school districts to measure poverty that is based on alternative data sources, such as the Supplemental Nutrition Assistance Program, the Temporary Assistance for Needy Families program, Medicaid, or Head Start. Eight states allow school districts to multiply their identified student percentage by 1.6, known as the “free claiming percentage” under community eligibility, as a proxy for free and reduced-price percentages in community eligibility schools.<sup>13</sup>

Eighteen states that use free and reduced-price school meal eligibility in their state education funding formulas have established a policy requiring school districts to collect household income data outside of the school meals program, either annually or every four school years. Collecting these alternative forms is a cost to the school district and also deters some schools from adopting community eligibility. These states can consider following the lead of the 16 states and the District of Columbia that have allowed other data to be used to determine state education funding and do not require the alternative form. Additionally, four states allow community eligibility schools to use its most recent free and reduced-price data. Twelve states do not use school meal data for the purposes of state education funding, so community eligibility implementation does not impact state funding in these states.

States that are unable to eliminate the use of the alternative income form can implement best practices to ease the burden of collecting the forms. These include collecting forms less frequently, such as once every four years; allowing school districts to incorporate income questions into school forms that are already collected; simplifying the state-required form to include only the information required for state-funding purposes; and allowing school districts to collect the forms throughout the school year, as data are often used for the following school year.

## Conclusion

Community eligibility allows high-needs schools and districts to meet the nutritional needs of the many low-income families they serve. The option creates hunger-free schools by ensuring that students are well-nourished and ready to learn, and it allows school nutrition departments to use their resources to provide nutritious meals by streamlining administrative requirements. The 30,667 participating schools understand the countless benefits that community eligibility provides to students and schools.

As the nation struggles to recover from the economic impact of COVID-19, community eligibility offers an important opportunity for schools to respond to the increased need among their students. With the growing number of families participating in the Supplemental Nutrition Assistance Program due to the economic crisis, more schools will be able to adopt community eligibility in the 2020–2021 school year. To bring these schools into community eligibility, states and school districts must work together to ensure that direct certification systems identify all students so that a school’s identified student percentage accurately reflects the need within the school. Outreach and technical assistance by the U.S. Department of Agriculture, State agencies, and anti-hunger advocates also will be critical as schools consider the social, health, and financial benefits of community eligibility, with many considering implementation for the first time.

<sup>12</sup> U.S. Department of Agriculture. (2016). Updated Title I Guidance for Schools Electing Community Eligibility (memo). Available at: <https://www.fns.usda.gov/updated-title-i-guidance-schools-electing-community-eligibility>. Accessed on April 26, 2020.

<sup>13</sup> For additional state approaches, refer to [State Approaches in the Absence of Meal Applications](#), a chart by the Food Research & Action Center and the Center on Budget and Policy Priorities.

## Technical Notes

The Food Research & Action Center (FRAC) obtained information on schools that have adopted community eligibility from state education agencies or entities at the state level that administer the federal school nutrition programs. Between September 2019 and April 2020, FRAC collected these data:

- school name;
- school district name;
- identified student percentage (ISP);
- participation in community eligibility as an individual school, part of a group, or a whole district; and
- enrollment.

FRAC followed up with state education agencies for data clarifications and, when necessary, to obtain missing data.

Under federal law, states are required to publish, by May 1 of each year, a list of schools and districts with ISPs of at least 40 percent and those with ISPs between 30 and just under 40 percent (near-eligible schools and districts). FRAC compared this published list to the lists of adopting schools, and compiled a universe of eligible and participating schools and districts in the 2019–2020 school year. When compiling the universe of eligible schools, 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 list of eligible schools. In addition, schools that were missing from a state’s list of eligible schools, but appeared on its list of adopting schools were treated as eligible.

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. The U.S. Department of Agriculture 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 community eligibility.
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 lists obtained from state education agencies indicated 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. For most schools adopting community eligibility during the 2019–2020 school year, states provided group-level ISP data and student enrollment numbers. Some states had schools that did not provide group-level ISP data:

- 73 schools in Maine;
- two schools in Michigan;
- two schools in New York; and
- one school in Pennsylvania.

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

- 22 schools in Alabama;
- 19 schools in California;
- 54 schools in the District of Columbia;
- four schools in Florida;
- five schools in Indiana;
- four schools in Louisiana;
- seven schools in Maine;
- 18 schools in Massachusetts;
- 12 schools in Michigan;
- one school in Missouri;
- one school in Nevada;
- four schools in Oregon;
- 531 schools in South Carolina;
- one school in South Dakota;
- five schools in Texas;
- 51 schools in Utah; and
- one school in Virginia.

To avoid leaving enrollment information blank, student enrollment data from the May 2019 published community eligibility list was used in the tables for the following states:

- three schools in Alabama;
- eight schools in California;
- 54 schools in the District of Columbia;
- four schools in Florida;
- two schools in Louisiana;
- 66 schools in Maine;
- 16 schools in Massachusetts;
- two schools in Michigan;
- one school in Missouri;
- 338 schools (all schools in New York City) in New York;
- 513 schools in South Carolina; and
- 51 schools in Utah.

After attempts to find enrollment from other sources, enrollment numbers are not filled in for these states:

- 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;
- 10 schools in Michigan;
- one school in Nevada;
- six schools in New York;
- four schools in Oregon;
- 18 schools in South Carolina;
- one school in South Dakota;
- five schools in Texas; and
- one school in Virginia.



**TABLE 1: Community Eligibility Provision (CEP) Take-Up Rate in School Districts<sup>1</sup> for School Years (SY) 2018–2019 and 2019–2020**

State	Eligible for CEP SY 2018–2019	Adopting CEP SY 2018–2019	Percentage Adopting CEP of Total Eligible SY 2018–2019	Eligible for CEP SY 2019–2020	Adopting CEP SY 2019–2020	Percentage Adopting CEP of Total Eligible SY 2019–2020
Alabama	120	46	38.3 %	117	49	41.9 %
Alaska	40	30	75.0 %	40	32	80.0 %
Arizona	317	153	48.3 %	291	174	59.8 %
Arkansas	150	64	42.7 %	148	69	46.6 %
California	744	291	39.1 %	684	336	49.1 %
Colorado	74	21	28.4 %	66	22	33.3 %
Connecticut	62	37	59.7 %	76	50	65.8 %
Delaware	27	22	81.5 %	24	19	79.2 %
District of Columbia <sup>2</sup>	38	36	87.8 %	38	34	89.5 %
Florida	296	188	63.5 %	300	198	66.0 %
Georgia	145	107	73.8 %	133	105	78.9 %
Hawaii <sup>3</sup>	18	16	88.9 %	12	11	91.7 %
Idaho	42	23	54.8 %	35	21	60.0 %
Illinois	498	247	49.6 %	504	267	53.0 %
Indiana	137	72	52.6 %	229	92	40.2 %
Iowa	76	22	28.9 %	76	20	26.3 %
Kansas	48	7	14.6 %	37	7	18.9 %
Kentucky	172	160	93.0 %	175	173	98.9 %
Louisiana	121	125	96.8 %	137	125	91.2 %
Maine	62	30	48.4 %	59	29	49.2 %
Maryland	31	15	48.4 %	31	16	51.6 %
Massachusetts	154	83	53.9 %	154	99	64.3 %
Michigan <sup>4</sup>	683	300	43.9 %	693	368	53.1 %
Minnesota	170	65	38.2 %	155	66	42.6 %
Mississippi	130	59	45.4 %	124	63	50.8 %
Missouri	213	99	46.5 %	213	101	47.4 %
Montana	71	57	80.3 %	70	55	78.6 %
Nebraska	48	13	27.1 %	95	16	16.8 %
Nevada	14	12	85.7 %	17	15	88.2 %
New Hampshire	12	4	33.3 %	11	3	27.3 %
New Jersey	169	84	49.7 %	170	85	50.0 %
New Mexico	145	123	84.8 %	142	123	86.6 %
New York	462	380	82.3 %	546	430	78.8 %
North Carolina	148	102	68.9 %	149	105	70.5 %

**TABLE 1: Community Eligibility Provision (CEP) Take-Up Rate in School Districts<sup>1</sup> for School Years (SY) 2018–2019 and 2019–2020**

State	Eligible for CEP SY 2018–2019	Adopting CEP SY 2018–2019	Percentage Adopting CEP of Total Eligible SY 2018–2019	Eligible for CEP SY 2019–2020	Adopting CEP SY 2019–2020	Percentage Adopting CEP of Total Eligible SY 2019–2020
North Dakota	21	21	100.0 %	23	23	100.0 %
Ohio	507	325	64.1 %	466	327	70.2 %
Oklahoma	204	126	61.8 %	255	122	47.8 %
Oregon	122	78	63.9 %	123	84	68.3 %
Pennsylvania	410	205	50.0 %	400	227	56.8 %
Rhode Island	27	6	22.2 %	26	8	30.8 %
South Carolina	86	59	68.6 %	83	61	73.5 %
South Dakota	43	27	62.8 %	43	27	62.8 %
Tennessee	139	93	66.9 %	139	91	65.5 %
Texas	818	329	40.2 %	902	411	45.6 %
Utah	16	13	81.3 %	16	13	81.3 %
Vermont	26	21	80.8 %	22	18	81.8 %
Virginia	117	62	53.0 %	162	75	46.3 %
Washington	180	72	40.0 %	168	89	53.0 %
West Virginia	53	52	98.1 %	57	53	93.0 %
Wisconsin	242	110	45.5 %	251	118	47.0 %
Wyoming	7	6	85.7 %	9	8	88.9 %
U.S. Total <sup>5</sup>	8,655	4,698	54.3 %	8,896	5,133	57.7 %

<sup>1</sup>For the 2018–2019 school year data, school districts are defined as eligible if they include at least one school with an identified student percentage (ISP) of 40 percent or higher, or at least one school has already adopted community eligibility. For the 2019–2020 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>The District of Columbia’s school district-level community eligibility data for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

<sup>3</sup>Hawaii’s school district-level community eligibility data for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

<sup>4</sup>Michigan’s school district-level community eligibility data for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

<sup>5</sup>The U.S.’s school district-level community eligibility data totals for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

**TABLE 2: Community Eligibility Provision (CEP) Take-Up Rate in Schools<sup>1</sup> for School Years (SY) 2018–2019 and 2019–2020**

State	Eligible for CEP SY 2018–2019	Adopting CEP SY 2018–2019	Percentage Adopting CEP of Total Eligible SY 2018–2019	Eligible for CEP SY 2019–2020	Adopting CEP SY 2019–2020	Percentage Adopting CEP of Total Eligible SY 2019–2020
Alabama	786	444	56.5 %	757	445	58.8 %
Alaska	238	208	87.4 %	235	208	88.5 %
Arizona	870	372	42.8 %	817	446	54.6 %
Arkansas	399	201	50.4 %	403	229	56.8 %
California	5,136	2,833	55.2 %	4,804	3,275	68.2 %
Colorado	370	105	28.4 %	347	105	30.3 %
Connecticut	412	307	74.5 %	462	364	78.8 %
Delaware	137	119	86.9 %	133	115	86.5 %
District of Columbia <sup>2</sup>	166	160	96.4 %	172	163	94.8 %
Florida	3,184	1,356	42.6 %	2,784	1,374	49.4 %
Georgia	1,026	818	79.7 %	992	834	84.1 %
Hawaii	101	69	68.3 %	96	68	70.8 %
Idaho	124	82	66.1 %	90	61	67.8 %
Illinois	2,163	1,541	71.2 %	2,168	1,588	73.2 %
Indiana	519	362	69.7 %	789	462	58.6 %
Iowa	298	156	52.3 %	310	176	56.8 %
Kansas	190	75	39.5 %	173	70	40.5 %
Kentucky	1,060	984	92.8 %	1,050	1,028	97.9 %
Louisiana	1,092	1,016	93.0 %	1,145	1,029	89.9 %
Maine	129	87	67.4 %	104	73	70.2 %
Maryland	368	242	65.8 %	320	238	74.4 %
Massachusetts	836	613	73.3 %	862	685	79.5 %
Michigan <sup>3</sup>	2,093	1,105	52.8 %	2,123	1,259	59.3 %
Minnesota	365	163	44.7 %	330	146	44.2 %
Mississippi	686	410	59.8 %	535	337	63.0 %
Missouri	695	420	60.4 %	699	427	61.1 %
Montana	184	157	85.3 %	176	150	85.2 %
Nebraska	183	26	14.2 %	274	26	9.5 %
Nevada	277	167	60.3 %	327	316	96.6 %
New Hampshire	18	4	22.2 %	16	3	18.8 %
New Jersey	607	331	54.5 %	621	319	51.4 %
New Mexico	617	546	88.5 %	636	568	89.3 %
New York <sup>4</sup>	3,822	3,565	93.3 %	3,753	3,481	92.8 %
North Carolina	1,232	882	71.6 %	1,327	941	70.9 %

**TABLE 2: Community Eligibility Provision (CEP) Take-Up Rate in Schools<sup>1</sup> for School Years (SY) 2018–2019 and 2019–2020**

State	Eligible for CEP SY 2018–2019	Adopting CEP SY 2018–2019	Percentage Adopting CEP of Total Eligible SY 2018–2019	Eligible for CEP SY 2019–2020	Adopting CEP SY 2019–2020	Percentage Adopting CEP of Total Eligible SY 2019–2020
North Dakota	31	29	93.5 %	31	31	100.0 %
Ohio	1,348	998	74.0 %	1,280	1,022	79.8 %
Oklahoma	565	427	75.6 %	696	408	58.6 %
Oregon	504	341	67.7 %	493	353	71.6 %
Pennsylvania	1,408	1,031	73.2 %	1,459	1,112	76.2 %
Rhode Island	104	37	35.6 %	101	58	57.4 %
South Carolina	664	515	77.6 %	634	531	83.8 %
South Dakota	136	97	71.3 %	131	97	74.0 %
Tennessee	1,013	836	82.5 %	981	840	85.6 %
Texas	5,103	2,716	53.2 %	5,558	3,250	58.5 %
Utah	58	52	89.7 %	57	51	89.5 %
Vermont	70	62	88.6 %	64	53	82.8 %
Virginia	723	428	59.2 %	1,085	511	47.1 %
Washington	739	273	36.9 %	629	314	49.9 %
West Virginia	618	540	87.4 %	615	545	88.6 %
Wisconsin	775	438	56.5 %	804	468	58.2 %
Wyoming	12	11	91.7 %	15	14	93.3 %
U.S. Total <sup>5</sup>	44,254	28,757	65.0 %	44,463	30,667	69.0 %

<sup>1</sup> For the 2018–2019 school year data, schools are defined as eligible for community eligibility if their identified student percentage (ISP) is 40 percent or higher, or if they adopted community eligibility. For the 2019–2020 school year data, schools are defined as eligible if they have an ISP of 40 percent or higher, or if they adopted community eligibility.

<sup>2</sup> The District of Columbia’s school-level community eligibility data for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

<sup>3</sup> Michigan’s school-level community eligibility data for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

<sup>4</sup> New York state decreased in the total number of adopting schools from school year 2018–2019 to school year 2019–2020 because of school consolidation in the school district New York City Chancellor’s Office. While the number of buildings counted as adopting community eligibility in New York City Chancellor’s Office are fewer, the number of children served is inclusive of all that had been previously served.

<sup>5</sup> U.S. school-level community eligibility data totals for the 2018–2019 school year have been updated since the publication of *Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019* (Food Research & Action Center, May 2019).

**TABLE 3: Community Eligibility Provision (CEP) Take-Up Rate by Schools' Identified Student Percentage (ISP)<sup>1</sup> for School Year 2019–2020**

State	Total Adopting	Eligible: 40 – <50%	Adopting: 40 – <50%	Percentage Adopting: 40 – <50%	Eligible: 50 – <60%	Adopting: 50 – <60%	Percentage Adopting: 50 – <60%	Eligible: 60%+	Adopting: 60%+	Percentage Adopting: 60%+
Alabama	445	197	19	9.6 %	250	174	69.6 %	310	252	81.3 %
Alaska	208	56	41	73.2 %	44	42	95.5 %	135	125	92.6 %
Arizona	446	273	67	24.5 %	260	144	55.4 %	284	235	82.7 %
Arkansas	229	191	82	42.9 %	142	102	71.8 %	70	45	64.3 %
California	3,275	998	199	19.9 %	1,508	1,042	69.1 %	2,298	2,034	88.5 %
Colorado	105	169	16	9.5 %	135	74	54.8 %	43	15	34.9 %
Connecticut	364	143	76	53.1 %	94	74	78.7 %	225	214	95.1 %
Delaware	115	38	29	76.3 %	76	74	97.4 %	19	12	63.2 %
District of Columbia	163	23	20	87.0 %	122	119	97.5 %	26	23	88.5 %
Florida	1,374	346	12	3.5 %	533	198	37.1 %	1,905	1,164	61.1 %
Georgia	834	229	136	59.4 %	374	348	93.0 %	385	346	89.9 %
Hawaii	68	30	5	16.7 %	5	3	60.0 %	61	60	98.4 %
Idaho	61	67	43	64.2 %	11	8	72.7 %	6	4	66.7 %
Illinois	1,588	375	73	19.5 %	372	206	55.4 %	1,421	1,309	92.1 %
Indiana	462	223	43	19.3 %	253	168	66.4 %	313	251	80.2 %
Iowa	176	100	7	7.0 %	106	76	71.7 %	104	93	89.4 %
Kansas	70	59	5	8.5 %	87	62	71.3 %	27	3	11.1 %
Kentucky	1,028	108	100	92.6 %	358	350	97.8 %	584	578	99.0 %
Louisiana	1,029	89	46	51.7%	306	283	92.5 %	750	700	93.3 %
Maine <sup>2</sup>	73	53	Not Reported	—	22	Not Reported	—	3	Not Reported	—
Maryland	238	66	15	22.7 %	228	210	92.1 %	26	13	50.0 %
Massachusetts	685	175	77	44.0 %	181	138	76.2 %	505	469	92.9 %
Michigan <sup>3</sup>	1,259	471	72	15.3 %	541	309	57.1 %	1,111	876	78.8 %
Minnesota	146	101	18	17.8 %	60	15	25.0 %	168	112	66.7 %
Mississippi	337	123	7	5.7 %	147	92	62.6 %	265	238	89.8 %
Missouri	427	248	83	33.5 %	160	102	63.8 %	289	240	83.0 %
Montana	150	54	33	61.1 %	42	38	90.5 %	80	79	98.8 %
Nebraska	26	110	4	3.6 %	79	11	13.9 %	85	11	12.9 %
Nevada	316	64	57	89.1 %	127	125	98.4 %	136	134	98.5 %
New Hampshire	3	10	1	10.0 %	4		0.0 %	1	1	100.0 %
New Jersey	319	263	81	30.8 %	152	62	40.8 %	205	175	85.4 %
New Mexico	568	116	69	59.5 %	340	331	97.4 %	180	168	93.3 %
New York	3,481	363	204	56.2 %	323	265	82.0 %	3,067	3,012	98.21%

**TABLE 3: Community Eligibility Provision (CEP) Take-Up Rate by Schools' Identified Student Percentage (ISP)<sup>1</sup> for School Year 2019–2020**

State	Total Adopting	Eligible: 40 – <50%	Adopting: 40 – <50%	Percentage Adopting: 40 – <50%	Eligible: 50 – <60%	Adopting: 50 – <60%	Percentage Adopting: 50 – <60%	Eligible: 60%+	Adopting: 60%+	Percentage Adopting: 60%+
North Carolina	941	321	69	21.5 %	281	194	69.0 %	725	678	93.5 %
North Dakota	31	6	6	100.0 %	8	8	100.0 %	17	17	100.0 %
Ohio	1,022	321	182	56.7 %	318	263	82.7 %	627	563	89.8 %
Oklahoma	408	269	92	34.2 %	298	239	80.2 %	118	66	55.9 %
Oregon	353	235	150	63.8 %	181	156	86.2 %	66	36	54.5 %
Pennsylvania	1,112	323	106	32.8 %	356	294	82.6 %	779	711	91.3 %
Rhode Island	58	31	5	16.1 %	27	19	70.4 %	43	34	79.1 %
South Carolina	531	138	67	48.6 %	192	170	88.5 %	304	294	96.7 %
South Dakota	97	28	12	42.9 %	35	25	71.4 %	68	60	88.2 %
Tennessee	840	281	172	61.2 %	353	332	94.1 %	347	336	96.8 %
Texas	3,250	996	60	6.0 %	1,573	895	56.9 %	2,989	2,295	76.8 %
Utah	51	7	6	85.7 %	30	29	96.7 %	20	16	80.0 %
Vermont	53	42	34	81.0 %	11	11	100.0 %	11	8	72.7 %
Virginia	511	371	102	27.5 %	423	256	60.5 %	291	153	52.6 %
Washington	314	269	78	29.0 %	211	125	59.2 %	147	109	74.1 %
West Virginia	545	163	126	77.3 %	358	339	94.7 %	94	80	85.1 %
Wisconsin	468	267	43	16.1 %	147	78	53.1 %	390	347	89.0 %
Wyoming	14	4	4	100.0 %	1	1	100.0 %	10	9	90.0 %
U.S. Total <sup>4</sup>	30,667	10,003	3,054	30.5 %	12,245	8,679	70.9 %	22,133	18,803	85.0 %

<sup>1</sup>In addition to the states that did not report the identified student percentage (ISP) that community eligibility schools use for federal reimbursements for all adopting schools, some states reported ISPs for adopting schools that are below the 40 percent eligibility threshold (one school in the District of Columbia, four schools in Georgia, six schools in Idaho, one school in Massachusetts, one school in Minnesota, two schools in Missouri, one school in New Hampshire, one school in New Jersey, 14 schools in Ohio, 11 schools in Oklahoma, 11 schools in Oregon, one school in Pennsylvania, and two schools in Washington). These schools are not included in the total number of adopting schools by each ISP category.

<sup>2</sup> Maine did not report the identified student percentages that community eligibility schools use for claiming federal reimbursements for meals served.

<sup>3</sup> Michigan did not report the identified student percentages that community eligibility schools use for claiming federal reimbursements for two schools.

<sup>4</sup> The data referenced in footnotes 1, 2, and 3 account for the difference between the U.S. total number of adopting schools and the total number of adopting schools by identified student percentage category.

**TABLE 4: Student Enrollment for School Years (SY) 2014–2015,<sup>1</sup> 2015–2016,<sup>2,3</sup> 2016–2017,<sup>4</sup> 2017–2018,<sup>5</sup> 2018–2019,<sup>6</sup> and 2019–2020<sup>7</sup>**

State	Enrollment SY 2014–2015	Enrollment SY 2015–2016	Enrollment SY 2016–2017	Enrollment SY 2017–2018	Enrollment SY 2018–2019	Enrollment, SY 2019–2020	Change SY 2018–2019 to SY 2019–2020
Alabama	180,789	196,802	195,853	208,748	208,929	208,068	-861
Alaska	27,666	29,234	34,106	36,575	37,244	36,560	-684
Arizona	30,763	55,048	94,229	116,488	145,273	178,535	33,262
Arkansas	791	20,060	55,605	71,475	80,732	91,510	10,778
California	113,513	435,900	748,533	799,646	1,690,225	1,944,304	254,079
Colorado	12,455	34,920	36,198	39,244	39,950	39,028	-922
Connecticut	66,524	105,547	110,322	118,067	151,552	175,155	23,603
Delaware	47,013	51,524	56,143	58,085	62,424	61,909	-515
District of Columbia <sup>8</sup>	44,485	54,061	56,774	60,548	59,251	58,258	-993
Florida	274,071	474,006	579,138	705,602	858,135	872,443	14,308
Georgia	354,038	420,383	467,411	472,296	490,319	510,532	20,213
Hawaii	2,640	4,650	20,150	28,750	28,994	27,747	-1,247
Idaho	18,828	32,299	33,058	33,898	28,876	21,953	-6,923
Illinois	552,751	672,831	685,101	725,241	731,062	762,195	31,133
Indiana	96,604	117,187	127,405	136,855	172,969	224,192	51,223
Iowa	32,103	46,021	50,589	53,880	67,192	81,424	14,232
Kansas	5,992	19,641	22,661	25,722	26,338	26,038	-300
Kentucky	279,144	385,043	436,419	479,450	501,059	522,512	21,453
Louisiana	146,141	217,496	341,492	455,318	399,190	493,999	94,809
Maine	5,284	17,977	20,411	20,435	23,733	19,975	-3,758
Maryland	7,624	94,496	99,484	103,814	106,218	102,788	-3,430
Massachusetts	134,071	200,948	238,872	260,364	282,030	301,465	19,435
Michigan <sup>9</sup>	266,249	275,579	273,071	287,801	418,447	466,540	48,093
Minnesota	20,688	49,944	57,003	57,957	63,057	51,818	-11,239
Mississippi	136,095	148,781	151,815	147,677	164,297	145,097	-19,200
Missouri	106,126	111,319	121,962	134,996	139,884	143,692	3,808
Montana	15,802	21,161	23,290	26,180	24,777	21,741	-3,036
Nebraska	180	2,425	4,277	7,411	7,276	6,173	-1,103
Nevada	7,917	15,970	71,345	95,001	100,957	218,746	117,789
New Hampshire	0	644	1,125	1,082	1,100	652	-448
New Jersey	99,840	107,277	127,108	140,199	153,533	144,312	-9,221
New Mexico	119,300	149,057	164,569	177,388	175,756	186,116	10,360
New York	505,859	528,748	603,795	1,586,981	1,646,409	1,742,005	95,596
North Carolina	310,850	357,307	367,705	433,204	418,820	455,237	36,417
North Dakota	5,284	5,661	5,698	6,039	6,525	7,424	899
Ohio	305,451	354,727	363,860	397,594	409,467	410,400	933

**TABLE 4: Student Enrollment for School Years (SY) 2014–2015,<sup>1</sup> 2015–2016,<sup>2,3</sup> 2016–2017,<sup>4</sup> 2017–2018,<sup>5</sup> 2018–2019,<sup>6</sup> and 2019–2020<sup>7</sup>**

State	Enrollment SY 2014–2015	Enrollment SY 2015–2016	Enrollment SY 2016–2017	Enrollment SY 2017–2018	Enrollment SY 2018–2019	Enrollment, SY 2019–2020	Change SY 2018–2019 to SY 2019–2020
Oklahoma	43,433	66,323	104,162	148,994	152,695	154,078	1,383
Oregon	103,601	129,635	130,336	129,766	122,553	133,615	11,062
Pennsylvania	327,573	394,630	426,984	470,275	509,073	540,877	31,804
Rhode Island	838	6,531	10,350	16,675	18,043	30,915	12,872
South Carolina	111,453	173,364	201,587	235,711	249,036	255,006	5,970
South Dakota	13,056	14,626	15,981	15,499	19,409	18,332	-1,077
Tennessee	417,165	436,821	428,424	437,641	389,163	382,428	-6,735
Texas	941,262	1,015,384	984,976	1,184,559	1,566,088	1,873,513	307,425
Utah	7,019	8,565	8,880	12,353	20,148	20,900	752
Vermont	7,386	12,751	13,508	13,946	13,768	12,053	-1,715
Virginia	42,911	99,404	119,051	156,687	204,610	241,056	36,446
Washington	53,369	69,432	75,357	95,514	110,815	126,278	15,463
West Virginia	124,978	145,057	177,875	195,075	208,960	209,566	606
Wisconsin	133,232	146,330	156,519	158,325	165,513	172,782	7,269
Wyoming	1,255	1,255	1,370	1,500	1,886	1,931	45
U.S. Total <sup>10</sup>	6,661,462	8,534,782	9,701,937	11,782,531	13,673,760	14,933,873	1,260,113

<sup>1</sup> 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).

<sup>2</sup> 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).

<sup>3</sup> [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) contains data on enrollment in community eligibility schools in Guam. [Community Eligibility Continues to Grow in the 2016–2017 School Year](#) (Food Research & Action Center, March 2017) excludes Guam; therefore, the U.S. totals for the 2015–2016 school year have been adjusted.

<sup>4</sup> 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 Maine, 26 schools in Tennessee, and four schools in South Carolina.

<sup>5</sup> 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 Mississippi, five schools in Oklahoma, one school in South Carolina, and two schools in Vermont.

<sup>6</sup> 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.

<sup>7</sup> 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.

<sup>8</sup> The District of Columbia's community eligibility enrollment data for the 2018–2019 school year have been updated since the publication of [Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019](#) (Food Research & Action Center, May 2019).

<sup>9</sup> Michigan's community eligibility enrollment data for the 2018–2019 school year have been updated since the publication of [Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019](#) (Food Research & Action Center, May 2019).

<sup>10</sup> U.S. school-level community eligibility enrollment data totals for the 2018–2019 school year have been updated since the publication of [Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019](#) (Food Research & Action Center, May 2019).



**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, and 2019–2020<sup>5</sup>**

State	Adopting SY 2014–2015	Adopting SY 2015–2016	Adopting SY 2016–2017	Adopting SY 2017–2018	Adopting SY 2018–2019	Adopting SY 2019–2020	Change SY 2018–2019 to SY 2019–2020
Alabama	347	392	391	425	444	445	1
Alaska	123	137	174	213	208	208	0
Arizona	73	133	227	296	372	446	74
Arkansas	4	57	139	178	201	229	28
California	208	651	1,070	1,311	2,833	3,275	442
Colorado	34	82	91	101	105	105	0
Connecticut	133	212	228	241	307	364	57
Delaware	96	107	115	116	119	115	-4
District of Columbia <sup>6</sup>	125	155	160	166	160	163	3
Florida	548	831	1,001	1,142	1,356	1,374	18
Georgia	589	700	768	787	818	834	16
Hawaii	6	25	43	65	69	68	-1
Idaho	50	88	92	92	82	61	-21
Illinois	1,041	1,322	1,363	1,499	1,541	1,588	47
Indiana	214	253	283	287	362	462	100
Iowa	78	110	119	123	156	176	20
Kansas	18	64	69	72	75	70	-5
Kentucky	611	804	888	948	984	1,028	44
Louisiana	335	484	741	968	1,016	1,029	13
Maine	21	59	72	71	87	73	-14
Maryland	25	227	228	242	242	238	-4
Massachusetts	294	462	525	574	613	685	72
Michigan <sup>7</sup>	625	662	652	715	1,105	1,259	154
Minnesota	56	125	153	154	163	146	-17
Mississippi	257	298	333	342	410	337	-73
Missouri	298	330	367	402	420	427	7
Montana	93	127	138	158	157	150	-7
Nebraska	2	9	15	26	26	26	0
Nevada	13	36	122	153	167	316	149
New Hampshire	0	2	3	3	4	3	-1
New Jersey	197	227	270	306	331	319	-12
New Mexico	343	429	487	535	546	568	22
New York	1,246	1,351	1,561	3,381	3,565	3,481	-84
North Carolina	648	752	787	914	882	941	59
North Dakota	23	24	25	26	29	31	2

**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, and 2019–2020<sup>5</sup>**

State	Adopting SY 2014–2015	Adopting SY 2015–2016	Adopting SY 2016–2017	Adopting SY 2017–2018	Adopting SY 2018–2019	Adopting SY 2019–2020	Change SY 2018–2019 to SY 2019–2020
Ohio	739	842	918	998	998	1,022	24
Oklahoma	100	184	301	413	427	408	-19
Oregon	262	340	346	344	341	353	12
Pennsylvania	646	795	861	959	1,031	1,112	81
Rhode Island	1	10	21	34	37	58	21
South Carolina	226	348	412	471	515	531	16
South Dakota	142	109	124	89	97	97	0
Tennessee	862	924	909	914	836	840	4
Texas	1,477	1,665	1,678	2,070	2,716	3,250	534
Utah	22	28	29	35	52	51	-1
Vermont	32	56	60	68	62	53	-9
Virginia	87	206	255	341	428	511	83
Washington	122	172	193	232	273	314	41
West Virginia	369	428	492	518	540	545	5
Wisconsin	348	381	415	422	438	468	30
Wyoming	5	5	7	10	11	14	3
U.S. Total <sup>8</sup>	14,214	18,220	20,721	24,950	28,757	30,667	1,910

<sup>1</sup> 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).

<sup>2</sup> 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).

<sup>3</sup> 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).

<sup>4</sup> 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)

<sup>5</sup> See table 2 for full notes on adopting schools in the 2018–2019 and 2019–2020 school years.

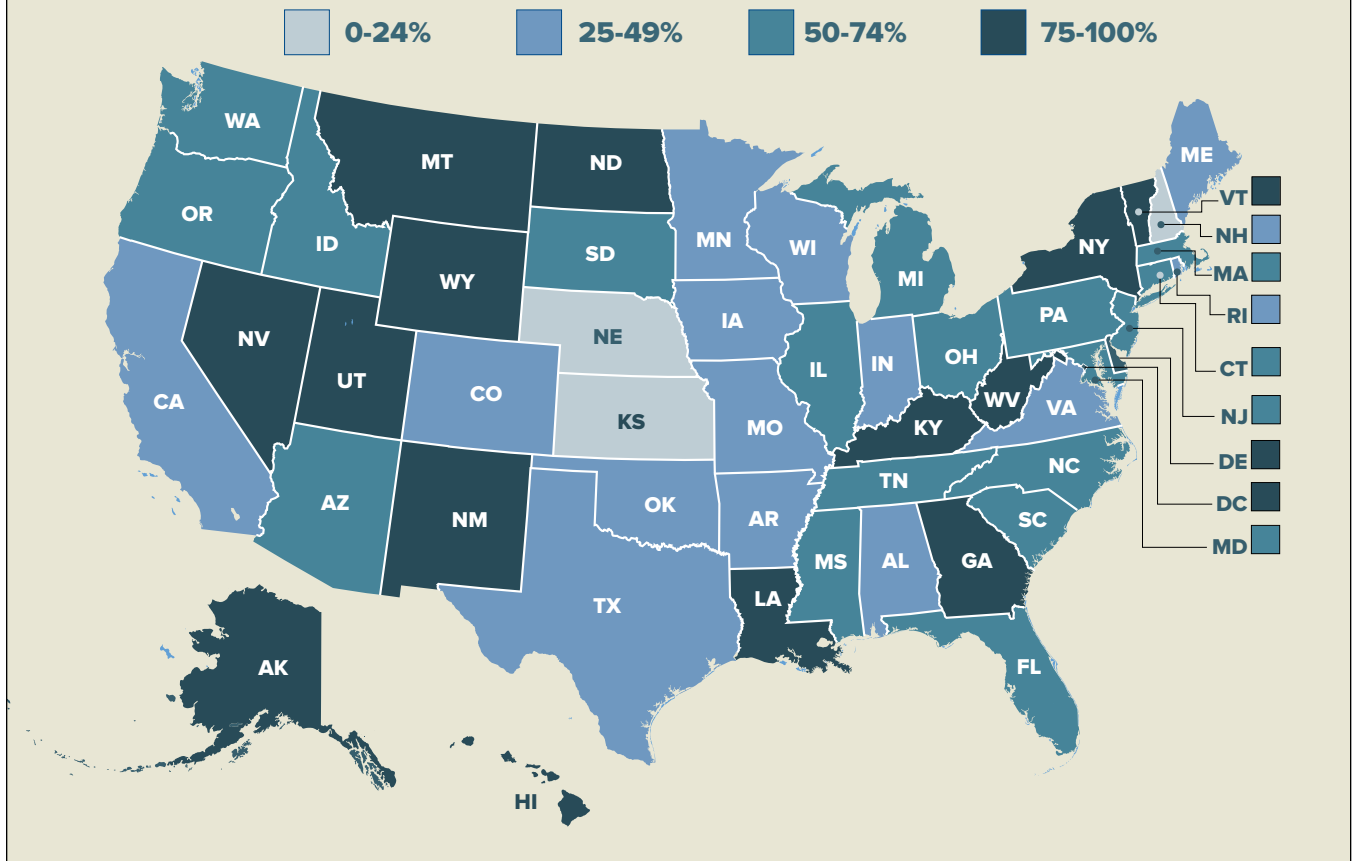
<sup>6</sup> The District of Columbia's community eligibility enrollment data for the 2018–2019 school year have been updated since the publication of [Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019](#) (Food Research & Action Center, May 2019).

<sup>7</sup> Michigan's community eligibility enrollment data for the 2018–2019 school year have been updated since the publication of [Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019](#) (Food Research & Action Center, May 2019).

<sup>8</sup> U.S. school-level community eligibility enrollment data totals for the 2018–2019 school year have been updated since the publication of [Community Eligibility: The Key to Hunger-Free Schools, School Year 2018–2019](#) (Food Research & Action Center, May 2019).

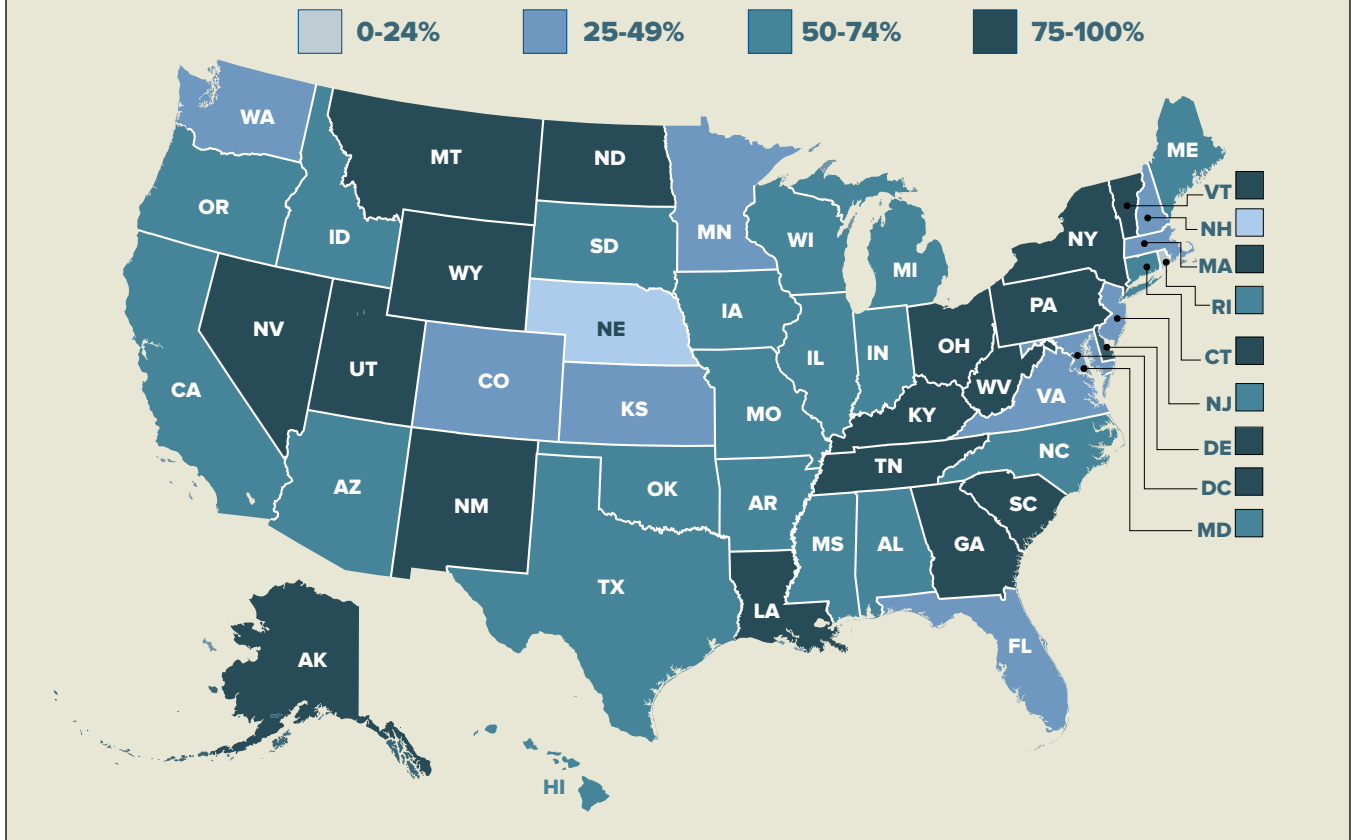
## Appendix A

### Percentage of Eligible School Districts Adopting Community Eligibility in School Year 2019–2020



## Appendix B

### Percentage of Eligible Schools Adopting Community Eligibility in School Year 2019–2020





EMBARGOED UNTIL  
**WEDNESDAY, MAY 27, 2020**  
12:01 a.m., Eastern

Food Research & Action Center  
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