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### COMMUNITY ELIGIBILITY CAN HELP MAKE OKLAHOMA SCHOOLS HUNGER-FREE

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Despite Oklahoma's relatively strong economy in recent years, we have not ensured that all children have reliable access to healthy foods. More than one-quarter of Oklahoma children experienced food insecurity in 2014, meaning that they had limited or uncertain availability of nutritionally adequate and safe foods.<sup>1</sup>

In 2014, 24 percent of the state's children lived in poverty (annual income just below \$20,000 per year for a family of three). Even several years after the recession officially ended, food banks across the state report record demand for food assistance, and in some instances programs had to turn away clients

because they ran out of food to distribute.<sup>2</sup> Enrollment in the Supplemental Nutrition Assistance Program (SNAP) in Oklahoma spiked in 2010 and has not significantly declined.<sup>3</sup>

Oklahoma's public schools are uniquely positioned to help address this problem. For ten months out of the year, most children spend at least eight hours a day at school. The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) allow vulnerable students to eat two meals a day for free or at reduced cost. In addition to providing students with regular, nutritious food, these meals take some of the strain off already-stressed family budgets.

School meals programs have traditionally required families to provide income eligibility information proving that their child qualifies. The necessary paperwork is sent home with a child, filled out by a parent, taken back to school by the child, turned into the child's teacher, and processed by the school or school district. Paperwork can be lost, completed incorrectly, or misread, leaving some students who qualify for free- or reduce-price breakfast and lunch without their meals. Furthermore, processing the paperwork can be a significant expense for schools.

This is where the Community Eligibility Provision (CEP) comes in. Part of the Healthy, Hunger-Free Kids Act of 2010, CEP gives schools that meet certain criteria the option to provide breakfast and lunch to all students at no charge, and it does away with income eligibility paperwork entirely. In Oklahoma, roughly 848 schools in 351 districts are eligible for the CEP, providing close to 300,000 students with a nutritious, reliable source of food while creating administrative savings and a streamlined mealtime procedures for schools and districts.<sup>4</sup> This brief will detail what community eligibility is and how it works; how the CEP has been implemented in Oklahoma so far; how the CEP interacts with other state and federal funding; and what opportunities community eligibility provides for students, families, and schools.

## How Community Eligibility Works

Community eligibility allows schools with a high concentration of students in poverty to offer nutritious meals through the National School Lunch and School Breakfast Programs to all students at no charge. The program was phased in gradually across the US. It was first available in three states for the 2011-2012 school year; in three more, plus Washington DC in 2012-2013; in four more states in 2013-2014; and nationwide in the 2014-2015 school year. Oklahoma was in the final group.



Districts that have adopted the Community Eligibility Provision report substantial successes with the program: in CEP's first year, superintendents in every adopting district said they would recommend the CEP to other districts, and participation nearly doubled in the program's second pilot year.<sup>5</sup> Student participation in both breakfast and lunch increased significantly in adopting schools.<sup>6</sup>

The Community Eligibility Provision relies on a mechanism that schools and districts already use to certify some vulnerable students for free meals. In most school child nutrition programs, schools have determined whether students

are eligible for free or reduced-cost meals by two methods. One method is for schools to send home income eligibility paperwork for families to fill out and return to school. However, some students automatically qualify for free school meals because they or their families are particularly vulnerable. Such students are considered eligible for free breakfast and lunch if they are in foster care or Head Start; are homeless or migrant; or are living in households that receive Supplemental Nutrition Assistance Program (SNAP) benefits, Temporary Assistance for Needy Families (TANF) benefits, or Food Distribution Program on Indian Reservations (FDPIR) benefits.<sup>7</sup> This process of determining eligibility is called "direct certification."

Schools have then used the income eligibility paperwork and direct certification to determine three groups of students within its meal program: those who receive free meals, those who receive reduced-cost meals, and those who pay full price. The USDA reimburses schools based on those percentages for the three categories.<sup>8</sup> This requires school nutrition directors to split their time and resources between feeding students and making sure that each student is charged the correct amount for his or her meal.

Community eligibility simplifies this arrangement. Reimbursements are based on the percentage of students who are directly certified for free meals (referred to as the "identified student percentage," or ISP). The identified student percentage is then multiplied by 1.6 to determine the percentage of meals reimbursed at the free rate, or "free claiming percentage." The free claiming percentage approximates the percentage of meals that would have been reimbursed at both the free and reduced rates without Community Eligibility Provision.<sup>9</sup>

Any remaining meals outside the free claiming percentage are reimbursed at the paid rate, and the costs of those meals must be covered using non-federal funds. Although multiplying the ISP by 1.6 can yield free claiming percentages above 100 percent, reimbursements are capped at 100 percent of meals served.

The financial impacts of electing the CEP may vary depending on the individual circumstances of a school or district. To help schools and districts determine whether community eligibility is a sensible option for their circumstances, the USDA has released an estimator tool to determine the financial implications of switching to community eligibility based on current child nutrition program data, student participation increases, and grouping options.<sup>10</sup>

For districts electing the CEP, a fair amount of control remains in the hands of local administration. Although a minimum ISP of 40 percent is required in order to participate in CEP, that ISP may apply to a single school, an entire district, or a group of schools within a district, depending on what configuration makes the most sense for that district. When sites electing the CEP are grouped, all sites in that group will all have the same free claiming percentage. Districts are not required to include all eligible sites in a group, and sites that may be ineligible on their own may be included in a group, provided the group's total ISP is at least 40 percent.

Districts electing the CEP participate in four-year cycles. When a district adopts community eligibility, they are guaranteed that their free claiming percentage will not change within four years. If a district's ISP increases during that period, they can reapply for a new free claiming percentage and start a new four-year cycle. If a district's ISP decreases during that period, their free claiming percentage stays the same. Similarly, although the USDA reserves the option to change the 1.6 multiplier to anywhere between 1.3 and 1.6, they will not do so within a four-year cycle.

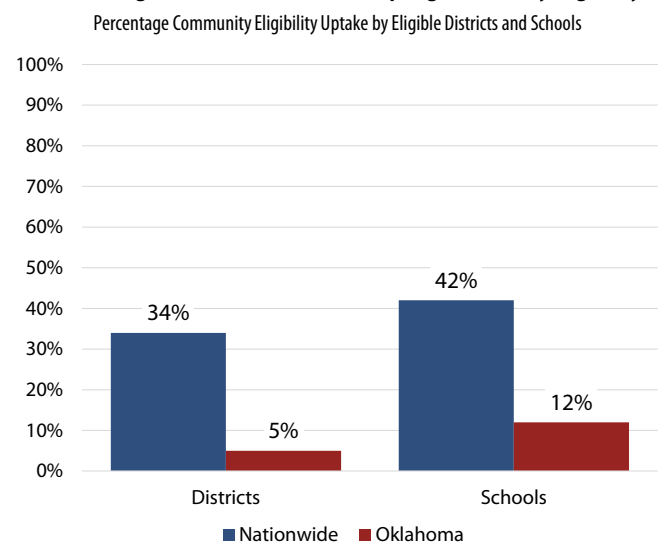
## The Community Eligibility Provision in Oklahoma

Eligibility is determined based on direct certification numbers as of April 1 of the previous year; a district electing community eligibility for the 2015-16 school year would need to be able to prove its direct certification numbers as of April 1, 2015.<sup>11</sup> Districts are required to submit district- and site-level direct certification data to the USDA by that deadline every year. States have the option to submit proxy data, although interested districts must provide full school-level direct certification data as of April 1 to determine eligibility and participate in the CEP.<sup>12</sup>

Oklahoma elected to submit proxy data, so detailed eligibility data for Oklahoma schools and districts is unavailable. This makes it impossible to precisely calculate Oklahoma's CEP uptake rate this year, but rough estimates based on data provided in the state eligibility report show that 351 districts including 848 schools are eligible to elect the CEP, with a total of 297,761 potentially affected students.<sup>13</sup>

In the 2014-15 school year, 18 districts with a total of 100 schools participated in community eligibility, affecting 42,766 students. Nationwide, uptake among districts averaged 34 percent last year; uptake among Oklahoma districts was 5.13 percent. Similarly, the nationwide median uptake among eligible schools was 42 percent, while uptake among eligible schools in Oklahoma was 11.79 percent.<sup>14</sup> According to district administrators, lack of guidance regarding community eligibility's implications for Title 1 and the state aid formula is a primary reason Oklahoma administrators have been reluctant to join the program.

**Oklahoma Lags Behind the Nation in Adopting Community Eligibility**



Data Source: Center on Budget and Policy Priorities

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However, there are reasons to believe that the foundations are in place for successful implementation of community eligibility across the state. Oklahoma's participation in both the National School Lunch Program and School Breakfast program are both high: almost 2 in 3 Oklahoma students — more than 400,000 students — received free or reduced-cost lunches in the 2013-14 school year.<sup>15</sup> About 1 in 3 students ate school breakfasts as well.<sup>16</sup> Oklahoma ranked 12th nationwide that year for the percentage of students certified to receive free or reduced meals who also participated in the breakfast program. Thus, Oklahoma schools are already broadly providing important nutritional services to vulnerable kids, and students are already accustomed to receiving meals in schools.

Oklahoma also performs particularly well at direct certification. In the 2013-2014 school year, Oklahoma directly certified 100 percent of its students receiving SNAP; the national average was 87 percent.<sup>17</sup> Students on SNAP only constitute a portion of the total number of students who may be directly certified, and schools may have significant room for improvement in directly certifying students who qualify through non-SNAP means. Nonetheless, this indicates that Oklahoma schools are ahead of the curve when it comes to a core element of the CEP.<sup>18</sup>

## Benefits of Community Eligibility

The Community Eligibility Provision benefits not only students but also the schools and districts. Schools are able to achieve economies of scale to purchase more food at lower prices, and staff are free to focus solely on feeding children rather than keeping track of whether students are being charged the right prices for the right meals, plus more students eating regular, nutritious meals means they will likely be happier, healthier, and more ready to learn.

### BREAKFAST

Emphasizing the importance of regular, healthy meals, the USDA requires that all community eligibility sites serve both breakfast and lunch. Although Oklahoma generally boasts high breakfast participation, electing the CEP may mean kickstarting previously underutilized school breakfast programs in some districts. School breakfast program participation has traditionally lagged behind school lunch program participation for a variety of reasons, including the stigma of participating in a program often only utilized by low-income students, as well as bus schedules which may deliver students to school after or during breakfast period.

Community eligibility allows schools to build in the expectation that all students will eat breakfast at school, thereby eliminating the stigma of participating. Furthermore, some schools further promote participation in breakfast by incorporating breakfast into the school day: some schools have a ten-minute breakfast period at the beginning of the school day, while others build in a similarly-brief breakfast between first and second hour.<sup>19</sup> Teachers and administrators report that the advantages of having students that aren't hungry outweighs the minor disruption the meal can cause.

Where it has been adopted, community eligibility has typically substantially increased breakfast participation. When the program was piloted, schools electing the CEP reported breakfast participation increases

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of 25 percent (from 44 percent to 56 percent) in Year Two, although increases of 10-15 percent are more common in electing schools.<sup>20</sup> Higher breakfast participation is a benefit to both students and schools: low-income children who eat breakfast at school have better overall diet quality than children who skip breakfast or eat at home. Breakfast at school is also associated with a reduced risk of obesity and other negative health outcomes, as well as better attitudes and academic performance throughout the school day. In particular, students who eat breakfast in the classroom at schools with universal breakfast have higher math and reading achievement.<sup>21</sup>



### MEALS IN SCHOOLS

Although the increases aren't as significant as with school breakfasts, schools electing community eligibility also report increases in lunch participation. School lunches provide a crucial source of regular, nutritious food for food-insecure students. Furthermore, more stringent nutrition standards mean that school lunches may be more nutritious than meals bought from home.<sup>22</sup> Those nutrition standards require that schools offer more fruits and vegetables, which can be pricey for schools to acquire. However, higher student breakfast and lunch participation in CEP schools mean that schools have a greater economy of scale when purchasing food.<sup>23</sup>

Community eligibility also allows schools to recuse themselves as bill collectors for paying students with unpaid account balances. For some districts, unpaid account balances can mean writing off thousands of dollars of debt every year — in an admittedly extreme example, New York City Public Schools racked up \$42 million in unpaid meal debt over an eight-year period.<sup>24</sup> It also means that school staff are no longer in the position of serving stigmatized meals or denying food altogether for hungry children whose parents haven't paid for their meals.<sup>25</sup> As the principal of one CEP school said, “We are no longer sending out bills for families. That was a major source of anxiety for children. It's the worst part of our job — it is gigantic not to have to deal with that.”

Community eligibility's benefits extend to the classroom. Participating schools report that alleviating hunger in high-poverty schools leads to fewer classroom disruptions and a better learning environment. Better-fed children are healthier and ready to learn, and the benefits of healthy, nutritious food in childhood are well-documented.<sup>26</sup> Participating schools report lower truancy rates after adopting the CEP, and in high schools, it's possible that presenting high-poverty students with two stigma-free meals at no cost every school day could reduce the number of students who drop out of high school to find work.<sup>27</sup> For families that may be distrustful of income eligibility paperwork and schools in general, feeding their children may be a concrete way to establish schools as places of community good and opportunity.

## Implications

Community eligibility is designed to relieve administrative burdens on participating sites and districts. However, for some districts, particularly those already participating in other programs designed to aid vulnerable students, electing the CEP involve extra planning. This section will outline how community eligibility interacts with other school programs and funding streams.

### NATIONAL SCHOOL LUNCH PROVISIONS 1, 2, AND 3

Three alternate provisions already allow some schools to bypass the National School Lunch Program's normal requirement for annual eligibility determination and income verification.<sup>28</sup> Provision 1 allows schools where at least 80 percent of enrolled students are certified for free and reduced meals to reduce eligibility determination to once every two consecutive years. Provision 2 allows schools to issue breakfast and lunch at no charge to all students, with reimbursements issued based on free, reduced, and paid claiming percentages established every four years. Provision 3 allows schools to issue breakfast and lunch at no charge to all students, with a fixed reimbursement amount established for four years.

Schools currently participating in any of the above programs may convert to community eligibility during a base or non-base year, provided the district can demonstrate that the participating schools meet the minimum direct certification threshold as of April 1 of the prior year. Current or prior participation in Provision 1, 2 or 3 is not a requirement to elect the CEP. Within a district, a single school or group of schools may participate in community eligibility while another school or group of schools participates in a provision program.

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### TITLE 1

Title 1 is federal grant program designed to aid disadvantaged students living in high-poverty areas.<sup>29</sup> As a rule, in most states, the amount of Title 1 aid a school district receives is based on Census data. However, in ten states, including Oklahoma, free and reduced meal data is used to determine district Title 1 funding in districts with enrollment of less than 20,000 students.<sup>30</sup> In most districts across the United States, free and reduced data has been used to apportion Title 1 funding within school districts.

States that have traditionally relied on free and reduced-cost meal data to apportion Title 1 funding have a number of options when it comes to adopting the CEP. In Louisiana, state education officials froze the free and reduced numbers indefinitely, meaning that districts are locked into the percentages they provided prior to the freeze. California instituted Alternative Data Collection Forms, collected every four years, to provide income-based poverty information to districts.<sup>31</sup> In Oklahoma, the State Department of Education has instructed school districts to utilize their schools' individual identified student percentages (ISPs) multiplied by 1.6 in lieu of free and reduced-cost meal data. This is one option outlined in federal guidance and has been utilized in other states as well.

Districts have several options for apportioning Title 1 funds between their schools without the free and reduced-cost meal data. A range of other poverty measures can be used instead.<sup>32</sup> One option is for districts to rank schools

by their individual identified student percentage multiplied by 1.6, which will loosely approximate the schools' free and reduced meal percentages. Schools participating as part of a group should be ranked by their individual ISPs, not their group ISPs, and non-CEP schools can still utilize this measure because they will continue directly certifying students regardless of CEP participation. Alternately, districts can rank schools by other measures, such as SNAP or TANF participation rates.

## **E-RATE**

The Universal Service Program for Schools and Libraries (E-Rate) is an FCC program that allows participating institutions to purchase telecommunications and internet service more affordably. Districts traditionally calculated the E-Rate discount using free and reduced-cost meals data. FCC guidance directs districts with schools electing CEP to calculate the discount using individual schools' identified student percentage multiplied by 1.6. The discount is then locked in for four years, unless a school's ISP increases, in which case the discount increases proportionately. If the USDA adjusts their 1.6 multiplier, the FCC will adjust theirs' accordingly.<sup>33</sup>

## **FRESH FRUIT AND VEGETABLE PROGRAM**

The Fresh Fruit and Vegetable Program provides free produce to students at schools with high percentage of students certified for free and reduced-cost meals.<sup>34</sup> For schools electing the CEP, the USDA has directed states to use individual schools' identified student percentage multiplied by 1.6 when allocating Fresh Fruit and Vegetable Program funds.<sup>35</sup>

## **AREA ELIGIBILITY**

The federal Child and Adult Care Food Program, the Summer Food Service Program, the Seamless Summer Option, and other programs may use free and reduced-cost meal data to establish area eligibility (i.e., If 50 percent or more of the attendance area of a meal site is certified to receive free or reduced-cost meals).<sup>36</sup> Because the identified student percentage multiplied by 1.6 is intended to approximate the free and reduced-cost percentage, USDA guidance says that districts should rank sites that use area eligibility by the individual sites' identified student percentage multiplied by 1.6.<sup>37</sup> It should also be noted that area eligibility will be applicable to all CEP sites, as the minimum ISP threshold of 40 percent multiplied by 1.6 yields a product of 64 percent – well above the 50 percent threshold for area eligibility.

## **STATE AID FORMULA**

State aid funds appropriated by the Legislature are divided among school districts according to a state aid formula. State Aid is based primarily on the number of students attending in each district, weighted based on various student characteristics, including free and reduced meal percentages.<sup>38</sup> For the purposes of state aid funding, Oklahoma districts electing the CEP may report their individual schools' ISP multiplied by 1.6 in lieu of free and reduced-cost meal data.

## **Conclusion**

The Community Eligibility Provision is a great opportunity for Oklahoma children, schools, and families. Schools are an integral part of the fight against childhood hunger, and guaranteed breakfast and lunch keeps kids healthy and ready to learn while easing stressed family budgets. Adopting community eligibility may require legwork upfront, but the program can bring significant administrative savings for schools. The Community Eligibility Provision has successfully operated in dozens of states, but Oklahoma lags behind on tapping its benefits. Schools, districts and advocates should seriously consider adopting community eligibility wherever they meet the requirements.

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