

**COMMUNITY ELIGIBILITY PROVISION EVALUATION (SUMMARY)**

**Background**

The Healthy, Hunger-Free Kids Act (HHFKA) provided schools and local educational agencies (LEAs) that predominately serve low-income children with a new option for meal certification. Under the Community Eligibility Provision (CEP), schools do not collect or process meal applications for free and reduced-price meals served under the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Instead, schools serve all meals at no cost and are reimbursed using a formula based on the percentage of students identified as eligible for free meals using direct certification and other lists of eligible students. Any costs for serving these meals in excess of the Federal reimbursement must be paid from non-Federal sources. CEP is intended to increase low income students' access to nutritious meals while reducing administrative burden.

The CEP is being phased in over a 4-year period, beginning in school year (SY) 2011-12. It will be available nationwide to those that meet the criteria in SY 2014-15. Three States participated in the 1st year (Illinois, Kentucky, and Michigan) with four more States added in each of the following 2 school years (the District of Columbia, New York, Ohio, and West Virginia in SY 2012-13, and Florida, Georgia, Maryland, and Massachusetts in SY 2013-14).

This evaluation, mandated by the HHFKA, examined the implementation and impacts of this new framework for providing free meals to all students in high-poverty schools. Specifically, the objectives of this evaluation were to obtain a better understanding of:

- The acceptability of the Community Eligibility Provision to LEAs,
- The incentives and barriers for LEAs adopting the provision,

- Operational issues that State agencies encounter in administering this provision, and
- Implications and impacts of making use of this provision, including impacts on:
  - NSLP and SBP participation and revenues
  - LEA and school administrative costs and staffing
  - Program integrity including certification error and meal counting and claiming
  - Meal quality and choices.

**Methods**

The study included an implementation study component and an impact study component in the seven States that implemented CEP in SY 2012-13.

The implementation study used administrative and extant data to examine LEA and school characteristics, and Web-based surveys from a sample of eligible participating LEAs, eligible nonparticipating LEAs, and near-eligible LEAs. State Child Nutrition Directors and staff were interviewed to obtain their perspectives on implementation successes and challenges. In addition, Title I directors in all 51 State education agencies were interviewed to gather data on programs using school meals data and how these programs might be affected by the elimination of free and reduced-price meal applications under the CEP.

The impact study collected and analyzed data on outcomes for matched samples of treatment (participating) and comparison (nonparticipating) LEAs. Program participation and revenue data were collected through a Web-based survey and State administrative data. Data on administrative costs and certification errors were collected through in-person interviews and record abstraction. Onsite observations were used to collect data on meal quality and meal counting/claiming errors.

## Findings

### Implementation Study Results

A large proportion of eligible LEAs opted to use the CEP in States where it was available, despite uncertainties about its impacts on finances and operations. Across the 7 States, a total of 420 LEAs and 2,312 schools participated in the CEP in SY 2012-13. This represents 32 percent of eligible LEAs and 29 percent of eligible schools.

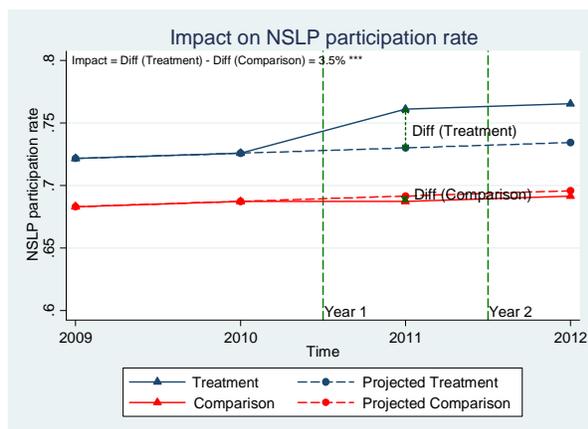
**Participating LEAs reported that they were both well satisfied and likely to continue using the CEP.**

**There were several key challenges at the State level:** (1) the limited time to gain a full understanding of the CEP, make decisions about participation, and implement it; and (2) understanding and addressing the implications of the CEP for education programs that use individual student meals certification data such as Title I and E-Rate.

**At the LEA level, the biggest reported barriers were financial concerns:** uncertainty about the impacts of the CEP on NSLP and SBP participation and the impacts on LEA finances, both within the school foodservice arena and the educational environment as a whole.

### Impact Study Results

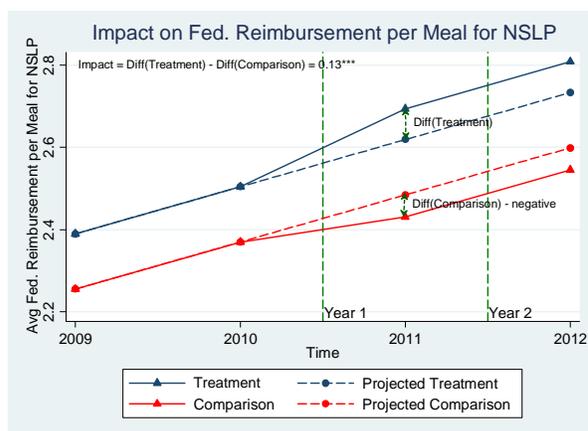
**The CEP correlated with significantly higher student participation in both the NSLP and SBP.** The average NSLP daily participation rate in CEP LEAs was 5.2 percent higher than comparison LEAs (3.5 percentage points). Similarly, the impact on SBP average daily participation represents a 9.4-percent increase in participation (3.6 percentage points).



**The CEP reduced the overall rate of certification errors and had little or no impact on errors in counting meals (at the cashier level) and claiming meals for reimbursement.** The CEP eliminated application processing errors that, in the comparison schools, resulted in certification errors in 6.6 percent of applications.

**For a broad range of meal quality measures, there was no evidence that the CEP had a significant impact.**

**Because a higher proportion of meals were reimbursed as free meals, CEP increased average Federal reimbursements per meal significantly**—about 6 percent for NSLP meals and 2 percent for SBP meals.



### Summary

Implementation of the CEP in its first 2 years was successful with regard to its two most important dimensions. Take-up rates of the CEP were widespread among eligible LEAs, and CEP appeared to increase NSLP and SBP participation and the associated Federal reimbursements. The continuing need for household income data for Federal and State education programs may pose the greatest challenge for broader implementation.

### **For More Information**

C. Logan et al. (2013). Community Eligibility Provision Evaluation Final Report. Prepared by Abt Associates Inc. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service. Project Officer: John Endahl. Available online at:

[www.fns.usda.gov/research-and-analysis](http://www.fns.usda.gov/research-and-analysis).