

FUEL 4 School

Universal School Breakfast & Lunch
Community Eligibility Provision



David C Blount
Emerson National Hunger Fellow
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Kenneth C. Regal, Executive Director

Just Harvest

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ABOUT JUST HARVEST

Founded in 1986, Just Harvest educates, empowers, and mobilizes people to eliminate hunger, poverty, and economic injustice in our communities by influencing public policy, engaging in advocacy, and connecting people to public benefits. We are guided by the understanding that hunger is a symptom of poverty and that poverty is a product of social and economic injustice. Rather than charity, public policies which respond to these conditions and to the needs of low-income people are the best approaches to the elimination of hunger and poverty.

ABOUT THE CONGRESSIONAL HUNGER CENTER

The Congressional Hunger Center (CHC) is a 501(c)3 nonprofit that works to make issues of domestic and international hunger a priority to policymakers in the U.S. government, and to raise a new generation of leaders to fight against hunger and poverty. Its mission is to train and inspire leaders who work to end hunger, and to advocate for public policies that create a food secure world. Its Emerson National Hunger Fellows Program is a social justice program that trains, inspires, and sustains leaders, and supports a diversity of local and national approaches to **eliminate hunger, poverty and social inequality**, particularly racism. Fellows gain field experience fighting hunger and poverty through placements in community based organizations across the country, and policy experience through placements in Washington, D.C. The program bridges community-based efforts and national public policy, and fellows develop as **effective leaders** in the movement to end hunger and poverty.

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Executive Summary

This **Hunger Free Community Report** provides a local assessment of the Community Eligibility Provision (CEP), an approach schools may take to serve all students in a school or district at no cost to families. Just Harvest sought insights on the impact of Community Eligibility Provision (CEP) from local school districts, food service providers, state administrators, and community members. The gathered information presents the CEP's effect on meal participation, school finances, administrative workloads, family households, and possible barriers limiting access to school meals. Just Harvest also explored the intersection of school meals in addressing child food insecurity and its effects on education. With this, we present action steps to ensure schools are able to maximize the benefits of the CEP in increasing access to quality meals for students.

Overall this is a report for Just Harvest, our community partners, and those invested in education and child nutrition. This report should provide insights into how schools are using the CEP as a tool to increase meal access and participation along with challenges schools and families still wish to address within food service. It should provide points for advocacy through discussing resources and actions needed for successful CEP implementation and improving food service in our schools.

SCHOOL MEALS & FOOD INSECURITY

Recent research has strengthened our understanding of links between food insecurity, childhood health, and student performance in schools. During a child's development, food insecurity may hinder socio-emotional and cognitive development and contribute to childhood obesity along with future chronic health issues. In schools, childhood food insecurity may contribute to higher absenteeism and behavioral disturbances and lower academic performance. School meals have been a tool to help address childhood food insecurity and provide needed nourishment for healthy child development and improve academic performance. Recent legislation and food justice advocacy has led to a greater focus on providing quality school meals for students with the hope of a healthier and more productive future.

COMMUNITY ELIGIBILITY PROVISION (CEP)

The Community Eligibility Provision (CEP) was introduced in the Child Nutrition Reauthorization of 2010: The Healthy, Hunger-Free Kids Act as a way to increase access to school meals for low income students. **The CEP is a new approach for schools in high poverty areas to serve all students free breakfast and lunch at no cost to families.** The CEP uses a paperless process to increase access to free meals for all students in qualifying schools. The CEP was piloted in 10 states and the District of Columbia through 2011-2014 before becoming available nationwide for the 2014-15 school year.

Around 86% of eligible schools in Allegheny County have adopted the CEP providing universal access to breakfast and lunch to over 41,000 students.

COMMUNITY FEEDBACK

Just Harvest conducted phone interviews with administrators from school districts that adopted the Community Eligibility Provision (CEP) and food service administrators. Using a script we asked their reasons for adopting the CEP and about noticeable effects on participation, administrative workload, finances, and changes in food service programming. Just Harvest also conducted focus groups and surveys with parents throughout participating districts. We asked about school meal participation, barriers to meal access, effects of meals on home budgets, and satisfaction with nutritional value.

From informational interviews with administrators from six school districts, three charter networks, and two food service providers, **four standard** reasons emerged in making the decision to adopt the CEP - that it:

- Increased access to free school meals for all students
- Decreased administrative workloads by eliminating free and reduced lunch applications
- Helped eliminate uncollectible debt from meals served without reimbursement/payment

From seven focus groups with over fifty parents total, **three standard** responses to questions on the impact of the CEP and school meals emerged:

- Parents expressed satisfaction with increased access and less concern about students missing meals
- Students still experience barriers preventing them from receiving meals
- Parents still have concerns about food portions and food quality

ACTION STEPS

Allegheny County has seen early success with the implementation of the Community Eligibility Provision (CEP): rising participation, decreased administrative workloads, and less concern about students missing meals they need. Now, along with community partners, Just Harvest can work to maximize the benefits of the CEP and ensure schools have the needed resources and community support to address concerns and prevent any regression. Recommendations include:

1. **Non-participating CEP-eligible schools should consider adopting the CEP.**
2. **US Congress should increase CEP multiplier determining meal reimbursement from 1.6 to 1.8**
3. **Schools and PA Department of Education should strengthen efforts to improve direct certification**
4. **PA Department of Education should increase funding supporting alternative breakfast programs**

Introduction: The Role of Federal School Meal Programs in Addressing Childhood Food Insecurity

16 million children in the U.S. live in food insecure households. Food insecurity has harmful effects on health, education, and work productivity. For education specifically, children who live in food insecure households could see inhibitions in their overall function and performance in school. The research on the links between food insecurity and child development is mixed. But researchers have documented the negative effects of food insecurity on cognitive and socio-emotional functions.ⁱⁱⁱ Such circumstances contribute to higher absenteeism, irritable or unresponsive behavior, and lower performance in courses. The accumulation of these effects contribute to setting them further behind their peers in food secure households.

Eighteen percent of Allegheny County's children (43,000) live in food insecure households. Such households are concentrated in high poverty areas. The corresponding school districts with high poverty communities experience the brunt of the effects of childhood food insecurity. Five of the 20 Pennsylvania school districts with the highest concentrations of poverty are in Allegheny County.

The School Breakfast Program and National School Lunch Programs are effective tools to address child food insecurity and its impact on youth development and education. In the 2012-2013 school year over 13 million U.S. children on a typical day participated in the School Breakfast Program. Over 30 million children participated in the National School Lunch Program.

Throughout Pennsylvania in 2014, 346,350 students ate 58,352,397 breakfasts through the School Breakfast Program. That's 168 breakfasts per student, a little less than half a year's worth of breakfasts. In the same year, 1,039,917 Pennsylvania students ate 173,225,765 lunches through the National School Lunch Program. That's 166 lunches per student, a little less than half a year's worth of lunches. With this, both School Breakfast and School Lunch programs provide a large proportion of children's nutritional intake throughout their K-12 educational career. Knowing that food is a building block for everyday function and health, we need to ensure that we prioritize access and quality of food as part of successful student development.

The body of research on school meals shows that school meal programs help address issues in childhood health, food insecurity, and underperformance in education. Such findings include^{iiiiivv}:

- School meal participation improves children's nutritional intake.
- School meals decrease the risk of food insecurity for low income children.

- School meals may protect against childhood obesity.
- School meal participation protects against negative health outcomes.
- School meals help improve children’s academic performance by providing nutrition needed for healthy development.

In prioritizing greater access and quality of food for students, the 111th Congress passed and President Barack Obama signed into law the Child Nutrition Reauthorization of 2010: The Healthy, Hunger-Free Kids Act or CNR 2010. CNR 2010 works to ensure low-income children have greater access to child nutrition programs.

For schools, CNR 2010 includes plans to improve access to the School Breakfast Program and National School Lunch Program, expand Afterschool Meal and Summer Food programs, and enforce higher nutritional quality standards for all school meals. For the purposes of this report I will focus on the **Community Eligibility Provision**, which was one of the many parts of CNR 2010 designed to help increase access to school meals.

Community Eligibility Provision (CEP)

WHAT IS IT?

Under the Community Eligibility Provision (CEP) a participating school offers breakfast and lunch to all students at no cost. Schools no longer collect take home paper applications determining who receives free or reduced lunch. The school will receive repayment from the federal government for a majority or full percentage of the meals they serve.

CNR 2010 introduced the CEP as a new approach for schools in high poverty areas to serve all students free breakfast and lunch at no cost to families. Instead of using take home paper applications, the CEP uses a paperless process to increase access to free meals for all students in qualifying schools.

The CEP was piloted in 10 states and the District of Columbia through 2011-2014 before becoming available nationwide for the 2014-15 school year. 665 schools throughout Illinois, Kentucky, and Michigan were the first to pilot the CEP in the 2011-12 school year. The pilot program expanded to 2,273 schools throughout New York, Ohio, West Virginia, and District of Columbia in 2012-13 school year. In the same year, participation of schools nearly doubled in initial pilot states to 1,240 schools. In 2013-14, more than 4,000 schools were utilizing the CEP, adding schools from Florida, Georgia, Maryland, and Massachusetts.^{vi} The CEP became available nationwide to all eligible school for the 2014-2015 school year. With this, 13,819 schools currently participate with expected growth for coming years.

Over the first two years meal participation increased by 13% with a 25% increase in breakfast participation. The difference in meal participation between CEP and non-CEP schools widened as well. Illinois, Kentucky, and Michigan saw the difference increase by 124% for lunch and 183% increase for breakfast.^{vii}

HOW DOES IT WORK?

Direct Certification is an important component when considering and planning for adoption of the Community Eligibility Provision (CEP). Schools may adopt the CEP if the number of students automatically enrolled for free school meals, or “Directly Certified Students,” is at least 40% of the total student enrollment.

This is a different process than the take-home paper applications for free and reduced meals. With direct certification, no applications are needed to determine if students should receive free meals. The school takes their list of enrolled students in the school and matches it with information from the State Department of Human Services stating which students live in households receiving public benefits.

Through the matching process, students are directly certified for free meals if they are in a household receiving SNAP (Supplemental Nutrition Assistance Program), TANF (Temporary Assistance for Needy Families), Medicaid, or FDPIR (the Food Distribution Program on Indian Reservations). Students who are homeless, runaways, migrant, or enrolled in Head Start may also be directly certified.

For each meal a school serves they may receive a reimbursements from the federal government to cover part or the whole cost of the meal. Once a school is eligible to adopt the CEP they may estimate the amount of money the school can expect to receive from the federal government under the CEP. To calculate an estimate, a school would take the percentage of students who directly certify for free meals and multiply it by 1.6, a figure set by the federal government in CNR 2010. The calculated number represents the percentage of meals the federal government will reimburse at the highest dollar amount or free meal. The remaining percentage of meals will be reimbursed at the lower dollar amount or student-paid meal rate.

Therefore, if a school has 62.5% or more of their students directly certified for free means, 100% of the meals served will be reimbursed at the highest dollar amount or free meal rate. In other words, all students in the school will be able to receive free meals i.e. “universal access”.

For Allegheny County, majority of the participating districts directly certify a majority of their students making the CEP more financially advantageous. Direct certification numbers for nine public school districts participating as a whole ranged from 48.31% to 82.4%. Four of the nine districts will have 100% of their meals reimbursed at the highest dollar amount by the federal government. Another three of the nine districts will have between 90% and 100% of their meals reimbursed at the highest dollar amount by the federal government.

EXPECTED BENEFITS

- All students have access to a breakfast and lunch each day with the universal service.
- The Community Eligibility Provision (CEP) gets rid of the need for paper applications for free and reduced meals leading to:
 - reduced administrative workload,
 - more efficient operations,
 - increased student participation in school meals.
- Some schools may experience an increase in revenues from a higher reimbursement rate for meals due to higher participation.
- School climate and student academic performance may improve.
- Childhood food insecurity is alleviated.

COMMUNITY ELIGIBILITY PROVISION (CEP) FOR ALLEGHENY COUNTY

835 schools throughout Pennsylvania are eligible for the Community Eligibility Provision (CEP). Around 14% of eligible schools (~120) are in Allegheny County. Of the more than 140,000 students in Allegheny County, around 39% of them qualify for free and reduced meals. Around 28% of students directly certify without the need for a take home application.

A large proportion of low income students reside in areas with a high concentration of poverty. Such conditions lead to some school districts seeing high percentages of their students eligible for free meals. (See Figure 1) The CEP-eligible schools in Allegheny County serve a little less than 50,000 students with more than 28,000 or 57% of enrolled students directly certified for free meals. Here, the CEP becomes an option for schools to provide meals more effectively and efficiently to meet the needs of their students.

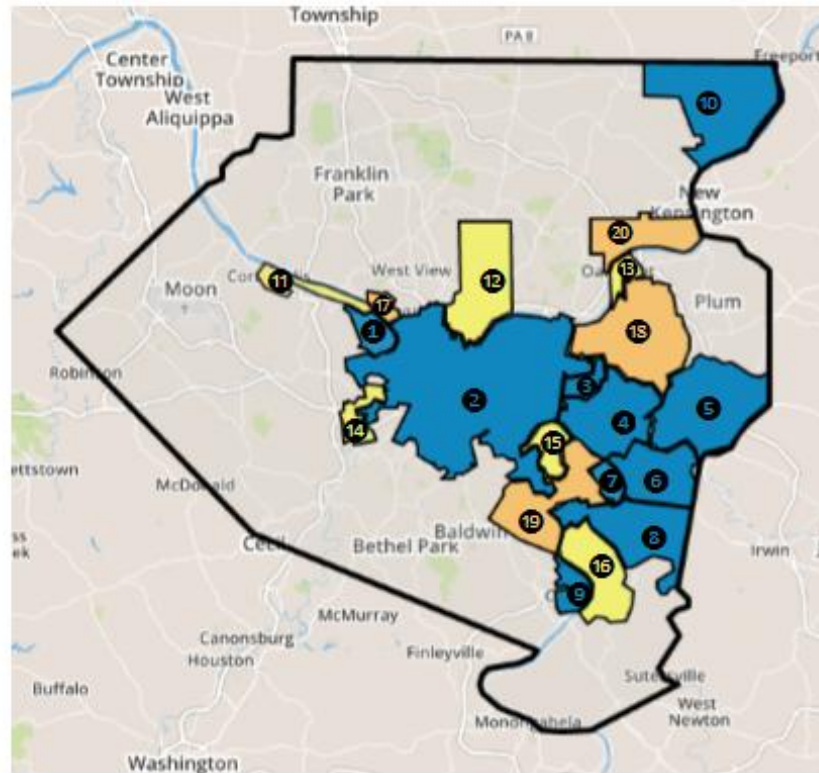
For the 2014-15 school year in Allegheny County, nine school districts, three charter networks, one school in Gateway School District, and eight Allegheny Intermediate Unit^{viii} sites adopted the CEP. (See Figure 2) The participation rate of eligible schools and educational agencies in the CEP was 101 out of 117-121^{ix} or around 86%.

The schools and agencies enrolled in the CEP on average directly certify 61.9% of their students for free meals. On average, they will receive a reimbursement at the highest dollar amount for 90.83% of meals and 8.65% of meals at the lower reimbursement amount. Over 25,000 students qualify for free meals through direct certification. With the 100% coverage, over 41,000 students have access to breakfast and lunch at no cost to their families. Compared to the previous year, an estimated additional 11,000 students having access to meals at no cost due to universal access within participating schools.

FIGURE 1: 20 ALLEGHENY COUNTY DISTRICTS WITH THE HIGHEST CONCENTRATION OF FREE & REDUCED ELIGIBILITY

Adopted CEP	School District	Free/Reduced	Direct Certification	At Least 1 School Eligible
✓	DUQUESNE CITY SCHOOL DISTRICT	94.55 %	82.40%	✓
✓	CLAIRTON CITY SCHOOL DISTRICT	90.84 %	79.59%	✓
✓	WILKINSBURG BOROUGH SCHOOL DISTRICT	81.50 %	68.53%	✓
✓	STO-ROX SCHOOL DISTRICT	79.02 %	61.69%	✓
✓	WOODLAND HILLS SCHOOL DISTRICT	77.77 %	76.22%	✓
✓	MCKEESPORT AREA SCHOOL DISTRICT	74.15 %	61.30%	✓
✓	PITTSBURGH SCHOOL DISTRICT	73.11 %	58.36%	✓
	CORNELL SCHOOL DISTRICT	66.20 %	47.75%	✓
	PENN HILLS SCHOOL DISTRICT	65.44 %	21.07%	
	STEEL VALLEY SCHOOL DISTRICT	64.51 %	41.11%	✓
✓	EAST ALLEGHENY SCHOOL DISTRICT	63.46 %	48.31%	✓
✓	HIGHLANDS SCHOOL DISTRICT	55.37 %	54.92%	✓
	SOUTH ALLEGHENY SCHOOL DISTRICT	54.90 %	39.36%	✓
	NORTHGATE SCHOOL DISTRICT	51.04 %	30.07%	
	WEST MIFFLIN AREA SCHOOL DISTRICT	50.88 %	33.08%	
	CARLYNTON SCHOOL DISTRICT	50.04 %	38.16%	✓
	ALLEGHENY VALLEY SCHOOL DISTRICT	48.00 %	21.60%	
	BRENTWOOD BOROUGH SCHOOL DISTRICT	46.28 %	31.72%	
✓	GATEWAY SCHOOL DISTRICT	41.21 %	22.68%	
	RIVERVIEW SCHOOL DISTRICT	34.45 %	23.55%	✓

FIGURE 2: MAP OF COMMUNITY ELIGIBILITY PROVISION (CEP) ELIGIBILITY & PARTICIPATION



Participating in CEP

- 1 Spanglish School District
- 2 Pittsburgh Public Schools
- 3 Wilkinsburg School District
- 4 Woodland Hills School District
- 5 Gateway School District
- 6 East Allegheny School District
- 7 Duquesne City School District
- 8 McKeesport Area School District
- 9 Clairton City School District
- 10 Highlands School District

Eligible Non-Participating in CEP

- 11 Cornell School District
- 12 Shaler Area School District
- 13 Riverview School District
- 14 Carlisle School District
- 15 Steel Valley School District
- 16 South Allegheny School District

Near Eligible for CEP

- 17 Northgate School District
- 18 Penn Hills School District
- 19 West Mifflin School District
- 20 Allegheny Valley School District

Charter schools are unmapped. Charter schools participating in the CEP include Urban Pathways Charter School, Urban League of Greater Pittsburgh Charter School, and Imagine Penn Hills Charter School of Entrepreneurship. Propel Charter Schools is eligible for CEP but has not chosen to adopt.^x

What Schools Say

After one semester school communities have started to observe the benefits of the Community Eligibility Provision (CEP) on their food service. School meal participation is increasing. Administrators and staff are happy to know all kids have access to meals. Schools say that workloads are lighter since discontinuing the free and reduced lunch paper applications. Schools are less concerned about students missing meals and are encountering fewer logistical and financial challenges than prior years.

informational interviews with administrators from six school districts, three charter networks, and two food service providers, **three standard** reasons for adopting the CEP were that it:

- **Increased access to meals for all students**
- **Decreased administrative workloads by eliminating free and reduced lunch applications**
- **Helped in eliminating uncollectible debt from meals served without reimbursement/payment**

THE CEP INCREASES ACCESS TO MEALS FOR ALL STUDENTS

School administrators shared that increasing access to meals was a priority in adopting the Community Eligibility Provision (CEP). In previous years the paper application process and meal payment tracking caused delays and contributed to students missing meals. The CEP enabled schools to eliminate logistical barriers and allow all students to access meals without constraint.

As a result, food service provider and school district administrators across districts that have adopted CEP shared that participation by students for breakfast and lunch has increased. Some districts, including Pittsburgh Public Schools, have seen modest increases near 5% in breakfast and lunch participation. Participation for lunch was typically high already for participating districts. But a number of school districts, including McKeesport Area School District reported greater increases in breakfast around 10-15%. Nutrition Group Inc., a local food service provider, was able to report a 5-10% revenue increase for their contracted schools.

“McKeesport Area School District wanted to increase access to all kids. There were kids who did not eat because they forgot their food or money. We had difficulty getting applications returned for free and reduced meals.”

Schools acknowledge the benefit of students being able to access meals when they need them and hope to see impacts on school climate and performance.

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LESSEN THE CEP DECREASES ADMINISTRATIVE WORKLOADS BY ELIMINATING FREE AND REDUCED LUNCH APPLICATIONS

Wilkinsburg School District shared, "it has been a big help discontinuing the free and reduced applications or tracking payments."

Pittsburgh Public Schools, "wanted to offer 'workload equity' to ensure all schools would benefit from the streamlined process to give students access to free meals through CEP."

School administrators shared that the Community Eligibility Provision (CEP) streamlined the eligibility process by only using direct certification data electronically and eliminating the paper applications. This change helped prevent the logistical barriers and made operations more efficient for staff and administrators. Having paper applications eliminated from the process frees time and energy for other needs within food service.

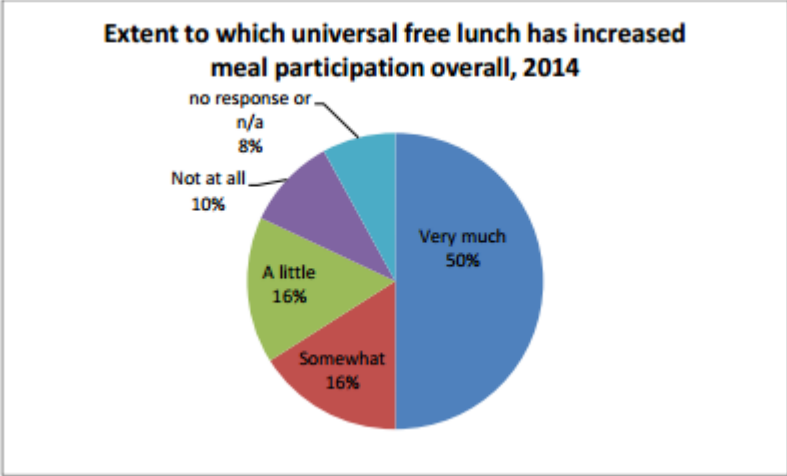
THE CEP HELPS ELIMINATE UNCOLLECTIBLE DEBT FROM MEALS SERVED WITHOUT REIMBURSEMENT/PAYMENT

Some schools don't turn students away from a meal when they forget food or money to purchase a meal. Schools will serve students and send a bill to the family later at the end of the year. Oftentimes families will be unable to cover the cost. As a result, school districts will have to pay for the outstanding charges. The Community Eligibility Provision (CEP) eliminates the need to track payments for individual students introducing universal access and thus eliminating the potential for outstanding charges.

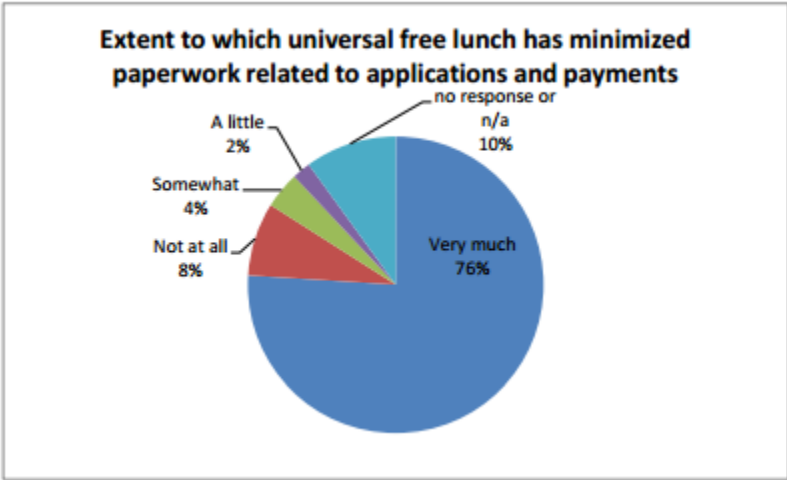
"As a district (Pittsburgh Public Schools) will reduce our taking on of uncollectible debt by around a quarter of a million dollars with the new option."

In partnership with **A+ Schools** we were able to ask 50 principals in **Pittsburgh Public Schools** about the impact of the CEP on their meal service.

Half of the 50 principals shared that meal participation for all students increased **“very much”**.



Over three out of four principals said the CEP **“very much”** minimized paperwork due to applications and payment tracking.



From principal feedback, universal access to school meals has led to a noticeable overall increase in meal participation and minimized paperwork for administrators and families. Responses help reinforce the impact of the CEP on helping increase participation among all students and making operations more efficient for schools.

What Parents Say

PARENT FOCUS GROUPS

Parents from participating schools across Pittsburgh Public Schools, Woodland Hills School District, Duchesne City School District, and Wilkesburg School District, were able to share their thoughts during our meetings with family support centers and outreach events hosted by community partners for youth and families. Three responses emerged among the parents.

- Parents expressed satisfaction with increased access and less concern about students missing meals
- Students still experience barriers preventing them from receiving meals
- Parents still have concerns about food portion size and food quality

SATISFACTION WITH INCREASED ACCESS AND LESS CONCERN ABOUT STUDENTS MISSING MEALS

Parents expressed they are happy to know that schools were working to ensure all kids were able to receive meals. They shared how in previous years students would be denied meals because of application mishaps or if they forgot food or money. Parents thought that should not happen and kids should always get fed.

“My child would come home saying they didn’t get fed and I’m left wondering why that’s happening when I know they have the application.”

“Some children still only get a small peanut butter and jelly sandwich and that’s not going to last them through the day.”

Two McKeesport Area School District students shared that they are happy knowing none of their peers are denied a meal now in their schools. They described days in previous years when some of their friends did not have food or money and would have to go without a meal.

“I no longer have to worry about applications and bouncing around to get them submitted.”

“It’s good to know kids can get food no matter what. This is a good thing.”

Some parents enjoyed that their school used the Grab & Go option, making it more flexible for students to get food even if they were late to school. Grab & Go is an alternative way to serve breakfast by allowing students to simply grab a prepared bag of food and take it with them to homeroom, class, or morning meeting.

Parents mentioned incidents from previous years where students were stigmatized when they did not have money or food. This was mainly due to the embarrassment of having to get a peanut butter and jelly sandwich or no food while other kids get a full tray of hot food. This should no longer be a concern.

BARRIERS STILL PREVENT STUDENTS FROM RECEIVING MEALS

Even after implementing the Community Eligibility Provision, schools and families still encounter various challenges that prevent some students from participating fully in the meal programs. Time and space in schools are valuable resources with high demand. Coordinating time and space for the preparation and serving of breakfast, lunch, and afterschool meals can run into logistical issues preventing the implementation of certain service options meant to help students participate more often. For various schools in Allegheny County, students may only receive a 15-minute period for breakfast and 30 minutes for lunch. Scheduling such a short time period creates a rush to serve students and for students to eat.

“(My son) doesn’t get to eat any breakfast when running late. He should be able to get something. Without it he misbehaves and is irritable because he’s upset and hungry.”

Also, some schools lack the physical space to accommodate their student population effectively and timely for meals. Breakfast service particularly suffers. Unlike lunch, which may be served over multiple periods with more manageable-sized groups, breakfast is open to all students during one period of time. This creates a bottleneck effect in the morning as students arrive all at once, leaving many without enough time to receive and eat breakfast before their first period class. Students even revert to skipping meals because they simply don’t get enough time to receive their food, sit down, and eat comfortably.

PRIORITY OF FOOD PORTIONS AND FOOD QUALITY

“I think they should have bigger portions for the older kids”

“My kids always come home hungry because they don’t get enough food.”

“Meals have decreased in size. And my kids are even hungrier.”

Parents shared how school meals portion sizes were a concern, especially for older kids who would complain of being hungry. Many parents told stories of students coming home hungry. Parents and students have shared that meals are too small and they are left hungry unless they purchase a second meal.

Food quality emerged as an overall concern. Even with the new federal nutrition standards parents and staff share that schools still are not giving the best food possible. Increased meal access for more kids is great but the food needs to get better. A few parents said schools should do fresh cooked food with fresh ingredients.

“Food needs to get better and more variety”

“Food should not be processed. Our children should eat Fresh Food that is prepared daily.”

“Better food makes good or shall I say great students.”

In addition to focus groups, we surveyed parents to gain further insights into the effects of school meals on families. Responses showed that there’s a noticeable increase in meal participation for families, free school meals provides some help to save money at home, and parents may be noticing an increase in intake of fruits and vegetables among their children. Such impacts may become more noticeable as meal participation continues to increase and further local assessments are conducted.

PARENT SURVEY^{xi}

- **AROUND 25%** OF SURVEYED PARENTS SAID THEIR CHILD PARTICIPATES **MORE OFTEN** IN SCHOOL BREAKFAST AND LUNCH THAN IN THE PREVIOUS YEAR (BEFORE THE COMMUNITY ELIGIBILITY PROVISION WAS ADOPTED AT THEIR SCHOOL).
- **58%** OF SURVEYED PARENTS SAY FREE SCHOOL MEALS **GREATLY HELP** SAVE MONEY FOR BUDGETS AT HOME.
- **20%** OF SURVEYED PARENTS SAID FREE SCHOOL MEALS **SOMEWHAT HELP** SAVE MONEY AT HOME
- **AROUND 67%** OF PARENTS SAY FREE SCHOOL MEALS EITHER **GREATLY OR SOMEWHAT HELP** THEIR CHILD EAT MORE FRUITS AND VEGETABLES.

Concerns to address

FINANCIAL CONSTRAINTS FOR CEP ELIGIBLE SCHOOLS

Around 17 to 19 schools in Allegheny County are eligible for the Community Eligibility Provision (CEP) but chose not to adopt CEP this school year. Financial constraints emerged as the main reason preventing adoption, according to the meal reimbursement estimates from schools using their direct certification percentage and the 1.6 multiplier.

Before the Community Eligibility Provision (CEP) schools would rely on paper take-home applications to record which students qualified for free or reduced meals. When serving meals,

schools would track which students received free meals, paid a reduced priced for meals, and paid the full price for meals. Schools would be reimbursed with funding from the federal government based on a sliding rate, with free meals receiving the highest dollar amount, reduced meals receiving a lower amount, and paid meals receiving the least amount of reimbursement. Schools also receive revenue from the reduced and full price payments from students. The combination of federal reimbursements and student payments are used to cover the cost of food service.

Schools adopting the CEP would benefit from a reimbursement formula that uses their direct certification percentage and the 1.6 multiplier. The formula takes the percentage of the student body that can directly certify for free meals and multiplies it by 1.6. The resulting number determines the percentage of meals the federal government will reimburse at the highest dollar amount. The 1.6 multiplier enables schools with direct certification numbers 62.5% or greater to have 100% of served meals reimbursed at the highest amount.

Some eligible schools with direct certification numbers between 40% and 62.5% do not receive the 100% or near 100% reimbursement of meals. Because all students eat for free, schools lose the revenues from the reduced price and full price student payments. As a result, these schools only receive the federal reimbursements determined by the CEP formula, which could be less than the combination of federal reimbursements and student payments they currently receive. Receiving less revenue under the CEP leads schools to find that universal service would not be financially feasible.

As has been shown, the CEP helps reduce administrative workloads eliminating paper applications and payment tracking. The CEP helps increase meal participation by eliminating logistical barriers and creating a universal, all inclusive food service for every student. But eligible schools still experience financial constraints preventing them from adopting the new options we know help improve food service.

LOW SCHOOL BREAKFAST PARTICIPATION

According to feedback from parents, students still experience barriers to meals due to logistical constraints with time and space within schools. Parents also shared their satisfaction with schools using new alternative breakfast programming to become more flexible with time and participation has increased as a result.

Unfortunately, in Pennsylvania less than half of students who participate in National School Lunch Program, **44% of them**, participate in school breakfast in Pennsylvania. Meaning too many students who qualify and could greatly benefit from breakfast at no cost to families are not receiving it.

The **PA Breakfast Challenge** has been a big part of the state's answer to address low breakfast participation. Schools participating in the challenge are able to receive guidance for

implementing new practices, such as, **Grab n Go, Breakfast in the Classroom, Breakfast After the Bell**. Monetary incentives are available for top performers showing the greatest increase to their participation. During the 2013-14 school year, the first year of the challenge, 1,087 schools participated throughout the state. Five schools more than tripled their school breakfast participation and another eighteen more than doubled their participation. 2015 will be the second year the PA Breakfast Challenge will be available for schools to participate in.

But even with greater participation from schools and monetary incentives for winners, the challenge is short-term and depends heavily on the generosity of donors. Also, schools still struggle to increase breakfast participation. According to the School Breakfast Scorecard released by FRAC, even with a slight increase in participation, Pennsylvania dropped in rank for breakfast participation from 39th to 41st nationwide^{xii}. Schools need more sustainable support in implementing new programming to increase and maintain participation.

DIRECT CERTIFICATION

Some schools districts have direct certification numbers that are too low and do not represent the actual need for free meals for their students. The lower numbers are due to ineffective processing and missing student information needed for effective direct certification. Eligible students fall through the cracks and experience logistical barriers to meals. It can also prevent a school from being eligible or able to reap all the benefits of the Community Eligibility Provision (CEP).

In the 2012-2013 school year Pennsylvania was identified as being in the bottom twelve states for direct certifying eligible students for free meals. **Less than 80%** of children in eligible households were directly certified for free meals in schools.^{xiii} This put the state well under the then 90% congressional performance standard for the 2012-2013 school year and 89% national average.

Over the last four years, Pennsylvania schools have improved their processes to directly certify a greater percentage of eligible students for school meals without paper applications. The **Pennsylvania Department of Education (PDE)** has invested in new technology and trainings provided through federal and state funding. PDE also has contracted **Center for Schools & Communities** to provide direct assistance and trainings through Direct Certification Summits throughout the state.

With that, the percent of directly certified eligible students **rose 19% reaching 85%**. As a result, more students are able to receive free meals through the paperless process, preventing logistical delays and lessening administrative workloads. This also helps ensure schools have the correct information about the socioeconomic level of their students, informing their decision to utilize a number of programs, including the CEP.

Action Steps

Schools and families have started to observe the benefits of participating in the Community Eligibility Provision (CEP). Participating schools and food service providers, community organizations, and state and federal government have worked to invest greatly in the consistent improvement of food service in schools. Our findings along with a growing number of reports reflect the possible benefits of CEP adoption. Moving forward, CEP-eligible schools should consider all possible outcomes with CEP adoption. CEP-participating schools should prioritize improving data processing for direct certification and using the new flexibility for programming to increase and maintain meal participation. Pennsylvania Department of Education should commit greater financial and technical supports to continue seen progress. We recommend:

1. **Non-participating CEP-eligible schools should consider adopting the CEP.**
2. **US Congress should increase the multiplier determining meal reimbursement from 1.6 to 1.8**
3. **Schools and PA Department of Education should strengthen efforts to improve direct certification**
4. **PA Department of Education should increase funding supporting alternative breakfast programs**

1. NON-PARTICIPATING CEP-ELIGIBLE SCHOOLS SHOULD CONSIDER ADOPTING THE CEP

The main concern for non-participating CEP-eligible schools in Allegheny County was financial feasibility. Their direct certification percentage was not high enough over the 40% eligibility marker to display financially solvent outcomes. We want to emphasize, along with financial feasibility, all eligible schools should also consider that the CEP offers:

- **Benefits of universal meal access for school climate and student performance**
- **Decreased administrative workloads due to discontinuing the take-home applications**
- **Greater flexibility to promote and implement programming helping increase participation**
- **Elimination of debt from uncollectible payments for served meals**
- **A greater proportion of families able to save money in home budgets**

Some non-participating schools in Allegheny County are estimated to receive the highest federal reimbursement for 100% or near 100% of served meals, minimizing concerns of losing revenue, which other districts may experience. **Steel Valley School District** and **Propel Charter Schools Network** have groups of schools that are favorable for CEP adoption. Direct certification numbers for all the schools within their district or network may not be high enough to fully support the CEP financially. But having a group of schools with the highest direct certification numbers adopt CEP should provide favorable financial outcomes.

2. US CONGRESS SHOULD INCREASE THE MULTIPLIER DETERMINING MEAL REIMBURSEMENT FROM 1.6 TO 1.8

CNR 2010 expires in September 2015. The 114th Congress will need to pass another reauthorization bill to continue funding and enforce regulations for child nutrition programs. The 2015 reauthorization provides an opportunity to assess both the impact of the included programs since the 2010 reauthorization as well as how the programs may be improved.

Increasing the CEP multiplier from 1.6 to 1.8 would greatly help eligible schools with direct certification numbers lower than 62.5% participate in the CEP without additional financial constraints. With a multiplier of 1.8, an additional **17 to 19 eligible schools** in Allegheny County with over **6,200 students** could estimate around a **10% increase** in the percentage of meals reimbursed at the highest dollar amount under CEP. **Around 13 of the schools** could receive a reimbursement at the highest dollar amount for 100% or near 100% of served meals. Easing financial constraints with a higher multiplier enables previously hesitant schools to now strongly consider adoption.

Non-Participating School Districts who stand to benefit:

- Cornell School District
- Steel Valley School District
- Propel Charter Schools
- Riverview School District
- Carlynton School District

3. SCHOOLS AND PA DEPARTMENT OF EDUCATION SHOULD STRENGTHEN EFFORTS TO IMPROVE DIRECT CERTIFICATION

Schools should ensure they use the most effective data matching methods and they access resources to acquire the needed technology for effective direct certification processes. Prioritizing their data processing ensures all eligible students for direct certification get certified for the meals they need with minimal barriers.

Schools can seek assistance with their data processing from **Center for Schools & Communities** and the **Pennsylvania Department of Education**. With the correct information and access to trainings we can ensure schools are capturing all the students they can who are eligible for free meals. Assistance can be sought at Direct Certification Summits hosted throughout the state, data matching guidance over the phone, or in person school visits. There are also grants available for technology upgrades to ensure the direct certification systems operate optimally.

A big step for the **Pennsylvania Department of Education** would be to more aggressively promote and standardize the new PrimeroEdge direct certification system for all PA schools, moving away from the use of Commonwealth of Pennsylvania's Access to Social Services (COMPASS). Focusing on the transition to and use of a single system will create a more efficient infrastructure for direct certification by schools and for providing direct assistance and training by the state and contracted partners. PA is still under the current 95% congressional performance benchmark^{xiv} and schools can continue to improve their direct certification with available resources and assistance.

4. PENNSYLVANIA DEPARTMENT OF EDUCATION SHOULD INCREASE FUNDS SUPPORTING ALTERNATIVE BREAKFAST PROGRAMS

The state should allocate funds to support the incentive structure for the PA Breakfast Challenge allowing the challenge to carry over from year to year until we see needed gains. Increased state funding should also go to strengthen implementation assistance within schools. Funding would support partnerships with local community partners who can provide personnel and guidance for effective programming.

Schools can also prioritize alternative programs as an integral part of the school day. This can be an opportunity to organize their school communities to educate each other about the importance of breakfast for students. School can expand involvement through the implementation process engaging parents, youth, staff, and faculty to help ensure new programming meets their needs. Schools should contact PA Department of Education on available resources and guidance materials.

OUR ROLE MOVING FORWARD

Just Harvest is willing to continue our work with community partners, schools and food service providers to ensure the proper investments are made and planning is done to increase access to high quality free school meals for all students who need them. Just Harvest plans to continue our support through:

- **Public education on the links between food insecurity and poor education outcomes**
- **Providing information on government meal and nutrition programs for children**
- **Promoting nutritious food as an integral part of child development and health**
- **Joining with education advocates, youth service providers, parents, and youth to continue to voice the importance of child nutrition as a benchmark for improving overall school performance and climate.**

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- ⁱ *Child Food Insecurity: The Economic Impact on our Nation*, Feeding America, 2009, <http://www.nokidhungry.org/sites/default/files/child-economy-study.pdf>
- ⁱⁱ Howard, Larry L. “Does food insecurity at home affect non-cognitive performance at school? A longitudinal analysis of elementary student classroom behavior,” *Economics of Education Review* 30 (2011): 157–176.
- ⁱⁱⁱ *Breakfast for Learning: Scientific Research on the Link Between Children’s Nutrition and Academic Performance*, Food Research and Action Center, Fall 2011, <http://frac.org/wp-content/uploads/2009/09/breakfastforlearning.pdf>.
- ^{iv} *Breakfast for Health*, Food Research and Action Center, Fall 2011, <http://frac.org/wpcontent/uploads/2011/08/breakfastforhealth.pdf>.
- ^v *Children’s Food Security and Intakes from School Meals*, Mathematica Policy Research, May 2010, <http://naldc.nal.usda.gov/download/42320/PDF>
- ^{vi} *Community Eligibility: Making High-Poverty Schools Hunger Free*, Center on Budget & Policy Priorities, October 2013, <http://www.cbpp.org/files/10-1-13fa.pdf>
- ^{vii} *Community Eligibility: Making High-Poverty Schools Hunger Free*, Center on Budget & Policy Priorities, October 2013, <http://www.cbpp.org/files/10-1-13fa.pdf>
- ^{viii} AIU3 provides alternative education and special education services for youth throughout Allegheny County
- ^{ix} The 117-120 range is due to possible shifts and unavailability of current direct certification data for Allegheny County schools
- ^x CEP eligibility information is based on the current available data from 2013-2014 school year by Pennsylvania Department of Education and changes may not be reflected.
- ^{xi} We received responses from 43 parents who participated in our focus groups and outreach events. It is for further insights and may not be fully representative.
- ^{xii} *School Breakfast Scorecard: 2013-2014 School Year*, Food Research and Action Center, February 2015, http://frac.org/pdf/School_Breakfast_Scorecard_SY_2013_2014.pdf
- ^{xiii} *Direct Certification in the National School Lunch Program: State Implementation Progress, School Year 2012-2013*, USDA, November 2013, <http://www.fns.usda.gov/sites/default/files/NSLPDirectCertification2013.pdf>.
- ^{xiv} The congressional performance benchmarks were set to increase from 80% for SY 2011-2012 to 90% for SY 2012-2013, and 95% for SY 2013-2014 and each school year thereafter. <https://www.federalregister.gov/articles/2013/02/22/2013-04118/national-school-lunch-program-direct-certification-continuous-improvement-plans-required-by-the>