

# The Community Eligibility Provision: Fueling the Future of Healthy Kids in King County



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February 2016



United Way of King County



## **Acknowledgments**

This report was written and compiled by Emily Johnson while working as an Emerson National Hunger Fellow at the United Way of King County in Seattle, Washington. This information and insight of this report would have not been possible without the guidance of United Way of King County staff including Lauren McGowan, Director of Family Stability, and Yuri Kim, Community Impact Manager.

Many thanks to Albert Ramirez and other Congressional Hunger Center staff who provided great feedback and questions during the Hunger Free Community Report process. Additional acknowledgements include Nutrition Directors in King County and Washington State who provided critical input into the challenges and barriers to CEP implementation; Linda Stone, former Food Policy Director at Children's Alliance, who provided materials and recommendations to improve CEP in the local and Washington state level; Office of Superintendent of Public Instruction for their staff input and CEP resources; and Food Research and Action Center staff for their assistance.

## **United Way of King County**

The mission of United Way of King County (UWKC) is to “bring caring people together to give, volunteer, and take action to help people in need and solve our community’s toughest challenges.” UWKC has been a leader in the fight against childhood hunger in King County and has set a goal to end child hunger. In 2015, UWKC launched the innovative Fuel Your Future campaign that utilizes AmeriCorps service members in high-needs schools to bolster student participation in federally funded child nutrition programs. UWKC leverages partnerships with business, government, philanthropic organizations, and nonprofit organizations to meet community needs.

## **Bill Emerson National Hunger Fellowship**

The Bill Emerson National Hunger Fellows Program is a social justice program through the Congressional Hunger Center that trains, inspires, and sustains leaders. The program supports a diversity of local and national approaches to eliminate hunger, poverty and oppression of all kinds, most notably racism. The program also nurtures an innovative national network of creative and inspiring change agents who share a vision of a just world. The first part of the fellowship focuses on local and community based efforts, while the second portion of the fellowship allows fellows to engage with national public and social policy and programs.

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## Executive Summary

Child hunger and poverty continues to persist throughout King County in Washington State, a stark juxtaposition to the growing affluence of tech and business sectors. With over 76,000 food insecure children in the county, it is a critical time for implementing innovative and effective solutions to feed more hungry kids.

The Community Eligibility Provision (CEP) is one such solution and a game changer in the approach we take in alleviating child hunger in high-needs schools. It reduces stigma of students receiving free and reduced meals, eliminates administrative burdens of processing Free and Reduced Meal Application, and streamlines meal services.

CEP is based off a school or school district's Identified Student Percentage (ISP) which is derived from the amount of students who are directly certified because of their families' involvement in government assistance programs like Basic Food, TANF, and FDPIR or because they are experiencing homelessness, in foster care, or are migrant youth. Schools that have implemented CEP are federally reimbursed for meals served through a formula based on this ISP number. It is important to note that eligibility for CEP is based off of the ISP number, not the Free and Reduced Lunch (FRL) percentage which is the traditional measurement of poverty in schools.

CEP has been adopted in more than 17,000 schools since 2010 and has been available nationwide since 2014<sup>1</sup>. Although the take up of the policy in Washington State has led to 51 districts and 176 schools to implement CEP, only 26 schools are currently implementing CEP in King County. This translates to only one in four eligible King County schools taking advantage of this great policy. This major underutilization in our community stems from a lack in awareness of the provision, prolific **misconceptions and myths** – including most notably the financial impact of the policy, the effect of the policy on state and local academic funding, and determining eligibility for the program – and lack of technical assistance and understanding of the process.

There are some **barriers that exist in CEP implementation**, and it is important that these are identified and understood during the consideration of wide-spread CEP implementation in King County. These include low ISP numbers in high-needs schools, potential financial losses in academic funding, and low student participation in school meal programs. However, there are several identified strategies that substantially reduce these barriers and challenges, and these strategies have been implemented in other states and counties across the country.

These strategies require **action from key stakeholders** in Nutrition Services, state agencies, local and state legislative and educational leadership, philanthropic and nonprofit organizations, child welfare advocates, and parents. We all have a role to play in alleviating child hunger in King County and ensuring that all students have access to healthy, nutritious school meals. The Community Eligibility Provision is an excellent tool to achieve such a goal, and the time is now to gain critical awareness of this policy and act for its successful implementation in King County.

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<sup>1</sup> USDA, 2016. "[Community Eligibility Provision: Planning and Implementation Guidance.](#)"

## Introduction to Child Hunger in King County

A tummy grumbles in a third grade class. It is ten o'clock in the morning, and Naomi is hungry. Embarrassed by her loud, empty stomach, Naomi sinks deeper into her chair. Naomi got to school early to play on the playground while her mom headed off to work, and she didn't grab a granola bar because the snack cupboard was empty for the third day in a row. She qualifies for free and reduced meals, but didn't want to go get breakfast in the cafeteria because all of her other friends already had breakfast at home. Now she waits for lunch, all the while daydreaming of food while she should be concentrating on mastering her multiplication tables.

There are kids like Naomi all across the country struggling with hunger in the morning, and it affects their learning, focus, and ability in the classroom.<sup>2</sup> In Washington State, nearly one in five children is food insecure. In King County, that translates to 76,000 children who lack access to healthy, affordable, and culturally appropriate food on a consistent basis.<sup>3</sup> What's more is that 100,000 students in King County are enrolled in the free and reduced meals program and rely on school meals every day for their daily nutrition.

It is especially important to highlight that the issues of child food insecurity and poverty disproportionately affect students of color and newly arrived immigrants and refugees that call King County their home. High-needs schools are more likely to have students of color, particularly Black and Latin@ students, attend them as compared to low-needs schools.<sup>4</sup> Additionally, Black and Latin@ students are nationally three times more likely to be enrolled in free and reduced school meals as compared to White students, meaning that students of color are disproportionately affected by barriers associated with accessing school meals.<sup>5</sup>

The School Breakfast Program and National School Lunch Program are essential child nutrition programs that ensure that children are accessing adequate nutrition to fuel up throughout the school day. However, stigma of receiving free or reduced meals, cost of reduced or full prices for the meals, and constraints of time allotted to eating prevent many students from accessing and taking advantage of school meals. These school meals are federally funded through reimbursements but are widely underutilized. In the 2013-2014, just slightly more than half of the low-income students who ate lunch also ate school breakfast on an average day.<sup>6</sup>

As a result of a combination of underutilization and barriers of access in King County, we have thousands of hungry students like Naomi, and we are leaving millions of federal dollars on the table. The good news? A new meal provision called the Community Eligibility Provision, created by Congress in 2010, can radically change the way that we feed hungry kids in King County.

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<sup>2</sup> For more information on the many effects of skipping breakfast on students' learning, visit Food Research and Action Center's (2014) "[Breakfast for Learning](#)" handout.

<sup>3</sup> Feeding America, 2015. "[Map the Meal Gap](#)."

<sup>4</sup> National Center for Education Statistics, 2015. "[Concentration of Public School Students Eligible for Free or Reduced-Priced Lunch](#)."

<sup>5</sup> NCES, 2007. "[Status and Trends in the Education of Racial and Ethnic Minorities](#)."

<sup>6</sup> Food Research and Action Center (FRAC), 2015. "[School Breakfast Scorecard SY 2013-2014](#)."

Through the Healthy, Hunger-Free Kids Act (2010), Congress created an awesome policy called Community Eligibility Provision (CEP) to address these barriers of stigma and access. Now more students in high-needs schools can access to nutritious, healthy school meals at no cost to them, and it is great for the school district too! School districts throughout King County have the potential to adopt this provision in their eligible schools, and this report contains the reasons why school districts should implement CEP as well as the steps and techniques to a successful CEP adoption. No matter what kind of stakeholder you are, you play a significant role in supporting the implementation of CEP across eligible schools in King County, so keep reading to find out more!

## Introduction to the Community Eligibility Provision

In 2010, Congress made huge strides towards alleviating child hunger through bolstered and improved school meals. The Healthy, Hunger-Free Kids Act (HHFKA) increased nutrition standards, slightly increased federal reimbursement levels, and introduced the Community Eligibility Provision as a way to increase student access to school meals.

**Community Eligibility Provision (CEP)** is a provision that allows eligible schools and districts with high percentages of low-income students to provide free school meals to all students. Instead of focusing on collecting free/ reduced paperwork from low-income students who nearly all qualify for free or reduced lunch, schools that adopt CEP are able to utilize direct certification to maximize time and funds to feed more children healthy and nutritious meals. Implemented incrementally over three years, the provision was made available nationally in School Year (SY) 2014-2015.

CEP is an excellent opportunity for high-needs schools and school districts to increase student participation, draw down more federal funds to the local community, and streamline work and application burdens of school and district-level nutrition staff. Feeding all children for free means that all students are fueled throughout the day to tackle academic challenges, perform better in class, and become hunger free!

### Eligibility for CEP: Identified Student Percentages

A school or district's eligibility for adopting CEP depends on the Identified Student Percentage (ISP) of the student body. ISP represents the students who are directly certified through their family's participation in Basic Food, Temporary Assistance to Needy Families (TANF), and Food Distribution Program on Indian Reservations (FDPIR) or are directly certified because they are experiencing homelessness, in foster care, enrolled in Even Start or Head Start, or migrant youth. Directly certified students are identified through state level matching of their families' involvement in these programs.

The ISP number is found by dividing the amount of Identified Students found eligible through Direct Certification by the total amount of students and then multiplying that by 1.6 (the federal multiplier).

A school or district is eligible for CEP if the ISP is **at or greater than 40%**. A school or district receives the full “free” federal reimbursement (100%) if the ISP is at or greater than **62.5%**.

Additionally, a school or district is only eligible if they serve food for the School Breakfast Program and the National School Lunch Program.

The ISP rate of a school depends on the participation of its students’ participation in those programs, but also on the effectiveness of the direct certification system in place at the state agency level.

## **Benefits of Community Eligibility**

Although the Community Eligibility Provision is relatively new to states across the country, there are many benefits that cut across various stakeholders. Adopting CEP:

- Alleviates child hunger by providing free meals to all students
- Reduces administration burdens of collecting and processing free and reduced meal application forms
- Increases school meal participation by streamlining meal services and allows more students get through the meal line faster
- Removes stigma around who is receiving free meals by providing it as an option for all students
- Increases federal revenues for meals served through a streamlined reimbursement system and also allows schools to take advantage of economies of scale in their food purchase and preparation
- Maximizes potential of and transition to alternative Breakfast After the Bell models

All of these benefits help maximize the draw down on federal funds to the local level, which translates to a stronger King County where children are hunger-free, healthy, and happy.

*“It is impossible for any child to learn when you are hungry. When you are really hungry, that’s the only thing that you can think about. You aren’t worried about math or reading or anything. ‘Feed me.’ Because of that I believe in free meals for every child regardless of income. Not only because of the importance, but because of the stigmas... No child should be punished because they are poor.”*

*– Parent from Roxhill Elementary, Seattle Public Schools<sup>7</sup>*

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<sup>7</sup> Quotes used throughout this document are from a parent focus group series conducted in Winter 15-16 by UWKC’s Fuel Your Future program. A compiled list of selected quotes can be found in the [Parent Focus Group Insight](#) section.

## Current State of Community Eligibility Provision

### Snapshot of United States

The national impact of CEP cannot be understated. Community Eligibility Provision was adopted by select states through school years (SY) of 2011-2014 and was available nationally for the first time in SY 14-15. In the first year of nationwide implementation, more than 7,000 of the highest poverty schools adopted the provision, and 6.6 million children around the country had access to two healthy meals at school throughout the school year.<sup>8</sup>

### Snapshot of Washington State

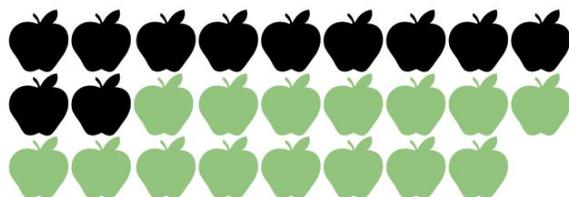
In SY 14-15, 32 districts and 120 schools across Washington State participated in the program for the first time, and in SY 15-16, there was an increase to 51 districts and 176 schools using CEP.<sup>9</sup> In SY 14-15 WA ranked 33<sup>rd</sup> amongst all other states in percentage of eligible schools adopting community eligibility, with 31 percent of eligible schools participating.<sup>10</sup>

### Snapshot of King County

In King County, however, the percentage of eligible schools participating in CEP in SY 15-16 is around 25 percent, lower than the state average. In its first year, 11 schools in Federal Way (5), Renton (1), and Seattle Public Schools (5) participated in adopting CEP. In SY 15-16, 15 more schools were added to make 26 total schools. These schools were added by Federal Way (4), Highline Public Schools (6), and Kent Public Schools (5). However, this meant that only 26 schools out of 103, or 25 percent eligible schools in King County were participating. Out of those 77 schools that are eligible but not participating, 46 are eligible at 80 percent full reimbursement.<sup>11</sup>



Only 1 in 4 eligible King County schools are participating in CEP



SY 15-16: 51 districts and 176 schools participated in CEP

King County  
SY 14-15: 11 CEP schools  
SY 15-16: 15 new CEP schools

<sup>8</sup> Center for Budget and Policy Priorities, 2015. "[Community Eligibility Making High- Poverty Schools Hunger Free.](#)"

<sup>9</sup> OSPI, 2015. "[Community Eligibility Provision Schools: WA State Schools Participating in CEP.](#)"

<sup>10</sup> CBPP, 2015. "[Take Up of Community Eligibility This School Year.](#)"

<sup>11</sup> Analysis was conducted using OSPI's 2015 "Community Eligibility Provision: Eligible LEA and School Report."

## Dismantling Myths about CEP

CEP is such a great provision being implemented in states and counties across the country to feed more hungry kids, but King County school districts remain hesitant to implement it fully in eligible schools. The answer to why lies in some of the misconceptions and myths about the program.

### **Myth: Schools lose money in implementing the program**

A prominent concern that exists with implementing this program is that schools can take a serious financial loss from other programs that rely on Free and Reduced Lunch (FRL) program participation numbers. Although it is true that federal, state, and local funding programs rely on FRL percentages to determine need amongst high-needs schools, new alterations have been made to ensure that schools implementing CEP can still access these funding sources. With the federal programs, the ISP number can be used to determine the percentage of high-needs students. With some state and local programs, individual income surveys can be used to collect information on a family basis that allows schools to still determine high need. Some challenges do exist with successfully distributing and collecting individual income surveys, and best practices surrounding family income surveys can be found in the **Family Income Survey Best Practices** section.

Another concern related to the financial impact of CEP is that the school district will no longer receive the income from reduced and paid students who access school breakfast and lunch. However, the school district will be able to receive a full federal reimbursement for those meals if the ISP is high enough. Further, school districts will no longer need to worry about calculating Paid Lunch Equity to determine the amount that a school district can charge for paid students. Additionally, CEP eliminates the need for school and district staff to track down families that have accrued debt throughout the year because there is now no debt to be had.

Food costs will increase as expected because the school is feeding more students, probably mostly students who had to previously pay in full for their meal. However, as more students eat school meals, the federal reimbursement will also increase. Many school districts in the state report that this results in no financial loss for the nutrition program. More about the financial impacts of CEP are located in **Financial Impacts to Consider** section.

### **Myth: CEP is a lot of work to transition to and once we start CEP, we are stuck with it**

Adopting CEP does take a bit of time in the front end: most of the work comes from determining ISP data, applying for the program, communicating to school staff and parents, and distributing family income surveys. However, once these key steps are completed, the work significantly decreases. This in part because schools no longer have to collect Free and Reduced Meal Applications, determine eligibility of families for the free meal program, collect money from reduced and paid meals, or track down student debts. School nutrition staff members benefit from a more streamlined meal service operation which allows students more time to eat. Furthermore, the high startup work that it takes before adopting and in Year One

significantly decreases as parents, school staff, and nutrition staff become more familiar with the different components of the program.

However, if for whatever reason, the school district decides that CEP is not working, they can to decide to stop the program and resume serving meals with the standard counting and claiming procedures. It is advantageous to stop before the start of a new school year so there is adequate time to communicate with the parents and school staff, but stopping CEP mid-year is an option. If school districts are contemplating stopping CEP at any time, they should notify OSPI immediately so preparation for a smooth transition can occur.

### **Myth: CEP is brand new and waiting to implement is a better choice**

CEP has been a provision since the passage of the 2010 Healthy, Hunger-Free Kids Act, and it has been successfully implemented in more than 13,200 schools since SY 14-15. Although it is a relatively new option in WA, CEP has been tested and tried in districts across the country and across the state. Best practices have already been established, and many of the challenges that arose in the first years of implementation have been successfully overcome with more guidance and adaption from the USDA. Successful stories of implementation at the national, state, and county level can be found in the [CEP Works! Case Studies](#) section.

There is no advantage to continue to wait to see if the program is effective- we already know that CEP is a great and feasible way to feed more hungry kids for free and reduce the administrative burdens of applications!

In fact, waiting to implement CEP may prove to be detrimental as it is most advantageous to lock in a high ISP that can be used for the four year cycle. If the ISP number increases, the school district always has the option of using the updated number to begin a new four year cycle, but a school cannot use ISP numbers from previous years if they did not elect CEP that first year. Particularly with the recent recovery after the Great Recession, more families are transitioning off assistance programs like Basic Food, and so that may affect the ISP amount of the school. It is best to lock in the highest ISP number so the school district can receive the highest level of full “free” reimbursement.

### **Myth: Only implementing CEP in a few schools in one district is too complicated**

School districts, especially large ones that encompass most of King County, often have a mix of high-needs schools that are eligible for CEP and schools that are not eligible for CEP. School districts have a choice to implement CEP in individual schools, a grouping of CEP eligible schools, or district-wide if all schools are CEP eligible. Some school districts with a few eligible schools may be hesitant to implement it because of the potential complications that may occur.

One concern is that schools will not fully understand how they were or were not chosen to be a participating CEP school. Many school officials incorrectly believe that ISP and FRL numbers are the same and that if their school has a significant FRL rate, that they should be eligible for free meals for all students at their school too. The benefits of implementing CEP are many, and

stakeholders who don't fully understand how a school is eligible may be frustrated that they are not receiving those same benefits.

Communication and awareness about the program remains crucial to school principals and staff to best understand how eligibility for the program is determined as well as the rationale for choosing some schools over others. However, interest in the program is obviously a great sign of support. Stakeholders at schools that are close to being eligible or feasible for a school district to implement CEP should be informed how their school could be eligible in the future or how their school may be currently eligible for another meal provision like Provision 2 or Provision 3. These provisions are ones that use FRL data instead of ISP data.

### **Myth: Transfer students and transient populations in King County complicate CEP Implementation**

The high amount of transient and homeless families who live in King County has been voiced as a concern for implementing CEP in certain school districts. However, King County is not the first county to experience the movement of populations from changes in rent, costs of living, and transportation, and CEP has been successfully implemented in these other large cities across the country. CEP accounts for this slight change in population by locking that ISP rate in for four years, regardless of the movement of the population. Also, implementing CEP allows for these children to seamlessly transition to receive free meals without an application at CEP participating schools. Remember, migrant and homeless children can be certified as identified students, so even if their families aren't participating in Basic Food, TANF or FDPIR, they will be counted towards that ISP number.

Another concern with implementing CEP in only a few eligible schools makes it complicated when it comes to students transferring across the school district. For example, if students transfer from a CEP participating school to a non-CEP participating school, the student's family must fill out a Free and Reduced Meal application within 30 days of attending the new school. Some families may not understand why they have to fill out that application, and this may result in delaying their application and ultimately a debt on the student's account. If a student is not eligible for free or reduced meals, the parents should be made fully aware that they will have to pay full price for any meals that the student consumes at school. A key way to overcome these challenges of transferring students is to explain fully to both the school staff and the parents on how CEP works and why the family has to fill out a form. This should be done as part of the transfer process to ensure that there is no disruption for the student's meal routine.

*"No student, in any district, no matter what grade you are in, should have to worry about how much they are going to have to pay for this lunch or breakfast. And their parents shouldn't have to worry about how to pay for the lunch, because families like us, we barely don't get free or reduced."*

– Parent from Neely O' Brien Elementary, Kent Public Schools

## Barriers to Implementing CEP

As with every new national provision, there are some barriers that prevent eligible schools and school districts from participating at the highest level possible. These challenges, although significant, are not insurmountable. Increased CEP implementation success can occur by first understanding these barriers and then creating effective strategies against them

### Current ISP Numbers Aren't Reflective of the High Need in Schools

In many King County schools, there is a significant difference between the free and reduced lunch (FRL) student percentage and the Identified Student Percentage (ISP). For example, a school can have a 85% FRL rate but a 41% ISP, meaning that although a large majority of students receive free or reduced meals, the school would barely be eligible for this program that feeds all students at no cost to the student. This is a problem because the FRL and ISP measurements are both indications of low-income levels of students and are used to determine eligibility for additional supports to those populations. A significant difference between the FRL and ISP rates shows us that there is a disconnect between families who are enrolling in FRL at the school level and families who are participating in benefit programs for which they would likely qualify.

In Washington State, this difference is especially important to highlight because the income limits that qualify a student for the free or reduced meals program are lower than the income limits for Basic Food. Essentially, we should expect that a family who qualifies for FRL is also enrolled in Basic Food or other related benefit programs; however, this is not the case for many families.

Barriers that exist for enrollment in benefit programs like Basic Food affect the level of families participating in those programs and, therefore, affect ISP levels. These barriers include stigma, awareness level, myths and misconceptions about eligibility, time, and language. For example, South King County is home to a wide-variety of ethnic and racial populations, including newly-arrived refugees and immigrants of various levels of status. These populations face multiple barriers in applying for benefits programs, including language, misconceptions about eligibility, and fears of negative repercussions of participating. However, these families could be eligible for these programs and their children are enrolled in the free and reduced meal program.

### Strategy to Increase ISP Numbers: Target Basic Food Outreach

Schools are much more likely to participate in CEP if they would receive full reimbursement or close to full reimbursement, so it is very important to increase ISP levels. ISP levels can be increased through more targeted outreach of specific populations that are eligible but not currently enrolled in programs like Basic Food, TANF, and FDPIR or Head Start. However, schools lack the capacity and expertise to launch their own outreach and enrollment of these programs throughout the year.

Therefore, coordinated efforts with community outreach partners to increase outreach efforts, such as WithinReach's network of Basic Food partners, can prove essential to ensuring that

folks are enrolled the program. Such targeted awareness and outreach was modeled with a UWKC's CEP presentation and targeted brainstorming discussion at the January 2016 Basic Food Education Forum hosted by WithinReach.

Awareness is the first step in promoting CEP across King County, but awareness is not the sole method to ensuring that eligible school districts implement this program. Targeted outreach for specific school communities is needed, and a partnership needs to be facilitated between community Basic Food outreach partners and school districts so more strategic outreach can occur.

### **Strategy to Increase ISP Numbers: Improve Direct Certification Methods**

Another strategy for increasing ISP numbers is ensuring that the direct certification system used by the state agency is the most effective in matching student enrollment lists against Basic Food lists and other assistance programs. The effectiveness of direct certification is key in ensuring that students who families' are enrolled in these programs are counted towards the ISP numbers. Direct certification systems are used not only for determining ISP numbers but also are used for directly enrolling students receiving Basic Food in the free and reduced meal program, thus removing the burden of collecting Free and Reduced Meal applications from those directly certified families.

Direct certification systems and their effectiveness, however, can vary by state agency, and this can prove to be a barrier for maximizing the potential of programs that rely on direct certification. Washington State, for example, had a SY 13-14 direct certification rate of 83 percent, meaning that 83 percent of school-age SNAP participants were directly certified by free school meals. This is slightly less than the national average of 87 percent, and WA State is currently ranked 38<sup>th</sup> out of states for direct certification rates.<sup>12</sup> WA's direct certification rate remained short of the 95 percent target percentages that were established by the HHFKA, and therefore had to develop a Continuous Improvement Plan that included action steps and measurements to ensure that progress was being made.<sup>13</sup>

The WA state agency, the Office of Superintendent of Public Instruction (OSPI), received federal funds for improving its direct certification process and program, and has increased the direct certification rate from 79 percent in SY 12-13.<sup>14</sup> However, more needs to be done with improving the OSPI matching system if the system is to be reliable for ensuring that families enrolled in these programs are accurately reflected in ISP numbers and enrolled directly into free and reduced meal programs.

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<sup>12</sup> USDA, 2015. "[Direct Certification in the National School Lunch Program: State Implementation Progress 13-14.](#)"

<sup>13</sup> CBPP, 2015. [Improving Direct Certification Will Help More Low-Income Children Receive School Meals.](#)"

<sup>14</sup> USDA, 2013. "[Direct Certification in the National School Lunch Program: State Implementation Progress 12-13.](#)"

### **Strategy to Increase ISP Numbers: Implement Best Practices of Direct Certification**

Best practices for improving direct certification at a state agency level, as compiled for Center for Budget and Policy Priorities<sup>15</sup>, included refining the data matching process to include variations of spelling and utilizing multiple data matches; using data to reach all children in the household even if they haven't been individually matched; conducting matching as often as possible to capture families that are enrolling in the program throughout the year; providing regular training for staff who are pulling the direct certification data; strength and expand systems for directly certifying vulnerable children who are not in households receiving SNAP benefits.

Many of the above techniques are applicable to WA State and should be implemented to ensure direct certification success. One of the most significant steps could include improving the data matching process to ensure that multiple data points are tracked and matched and that the system isn't relying on perfect matches of spelling or dates that could be entered incorrectly or inconsistently into files.

Another applicable technique would be to utilizing different programs, such as Medicaid, for low-income families to track and match students. Six states across the country have successfully incorporated Medicaid as a program used for direct certifications, and in January 2016, the USDA announced an initiative goal of having 20 states adopt the option to use Medicaid for direct certification. Washington should submit a proposal of interest to the USDA to participate in these demonstration projects of expanding direct certification to include Medicaid.

### **Schools are concerned about Financial Losses from Other Programs for High-Need Schools**

A substantial barrier that exists for school districts eligible for implementing CEP is the potential financial loss that comes from other funding programs, including the E-Rate (a discount program on telecommunications and Internet access) and Title 1 (a program providing extra funding to high-need schools ensure that all children are meeting high academic standards). These programs often use the Free and Reduced Lunch percentage (FRL) per school as a proxy measurement for the need within that school as compared to other schools within the district. Additionally, there are state and local funding sources and also programs that provide discounts to low-income students require individual family income data.

However, because the CEP eliminates the Free and Reduced Meal application, school districts can have difficulty distributing and applying for this funding to the different schools within a district.

### **Strategy to Address Funding Sources: Use ISP Data**

Federal education funding sources based on poverty levels have adapted to the use of ISP data as a proxy for FRL levels.

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<sup>15</sup> CBPP compiled a great list of Best Practices around Direct Certification. For more information, visit [Improving Direct Certification Will Help More Low-Income Children Receive School Meals.](#)

**Title 1:** After CEP was implemented nationally and the problem of capturing high-poverty schools for alternative funding sources emerged as a major financial challenge to school districts, the USDA issued several options of capturing poverty levels of Title 1 eligible schools. These options include using ISP rates; individual family income surveys; most recent Census data of children in poverty, aged 5- 17; children receiving financial assistance from state TANF programs; children eligible to receive Medicaid; and a combination of any of the above measures.<sup>16</sup>

For districts that include both CEP schools and non-CEP schools, measurements using ISP numbers and the 1.6 multiplier can be used to compare need across all of the schools to ensure that funds are distributed equitably. For more information and examples on how to overcome this particular challenge of determining school need for Title 1 funding, please read the [“Guidance Report: Community Eligibility Provision and Selected Requirements Under Title 1.”](#)

**E-Rate:** Similarly, navigating funding within the E-Rate program can also seem challenging at first glance. The E-Rate program, which provides high poverty schools with telecommunications and information services at more affordable rates, is also traditionally based on FRL percentages.

However, under new changes, the ISP number multiplied by 1.6 (the federal multiplier) can be used as a proxy for the free and reduced lunch number.<sup>17</sup> The percentage, like the reimbursement level for meals served at CEP schools, is capped at 100 percent, and this same amount can be used throughout the four year cycle.

### **Strategy to Address Funding Sources: Use Individual Income Surveys to Collect Data on Need**

E-Rate and Title 1 are not the only funding sources that rely on FRL percentages, however, and schools may need to be flexible in determining which students are in need of extra financial support. In King County and Washington State, there are a few state and local funding sources that still rely on FRL participation.

These state programs include the Learning Assistance Program, National Board Bonus, K-3 High Poverty Funding, and State Funded Full Day Kindergarten. These programs still require data from each individual family to determine the percentage of need for eligibility in these programs. However, two of the programs, State Funded Full Day Kindergarten and K-3 High Poverty Funding, will be phased out in the next few years. For the other programs, it is highly recommended that OSPI advocate for and help adopt an alternative measurement using ISP data for CEP schools.

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<sup>16</sup> USDA, 2015. [“The Community Eligibility Provision and Selected Requirements Under Title 1: Part A of the Elementary and Secondary Education Act of 1965, As Amended.”](#)

<sup>17</sup> USDA, 2015. [“The Community Eligibility Provision and Selected Requirements Under Title 1: Part A of the Elementary and Secondary Education Act of 1965, As Amended.”](#)

Other school district specific programs, like Advanced Placement test waivers and discounts for athletic programming, that are based off of free and reduced meal participation, and schools may need to determine an alternative measurement of equitably distributing resources to these students. Schools can use both direct certified lists and individual family income surveys to collect this data.

Individual family income surveys are a great alternative to collecting this data, both for state and local funding and individual programs. These surveys do not at all affect the eligibility of a student receiving free meals from a CEP school and cannot be financed through the federal funds of the school nutrition office of a district. Additionally, they cannot be required by the school district, only highly encouraged and incentivized. These family income surveys should be distributed at the beginning of the year along with other beginning of the year paperwork to increase the likelihood that they will be returned, and the income survey should be as simple as possible. For additional best practices, please look to [\*\*Family Income Survey Best Practices\*\*](#) section.

### **Low Student Participation in School Breakfast and Lunch Programs**

Another barrier that could dissuade a school from adopting CEP is low student participation in school meal programs. The potential positive financial impact of CEP is only reached when most students are eating school meals. Just implementing CEP, however, does not automatically mean that student participation will increase, so it is important to integrate CEP and alternative breakfast models that reduce barriers of time and stigma.

### **Strategy to Increase Student Participation: Transition to Alternative Breakfast Models**

CEP allows easier implementation of alternative breakfast models, like Breakfast in the Classroom and Grab and Go breakfast, which can maximize the number of students participating in the school meal program. These alternative breakfast models have proven to be the most effective in increasing the number of students eating breakfast, and national organizations like Share Our Strength have rallied around promoting alternative breakfast models in schools throughout the county. United Way of King County, through its Fuel Your Future initiative and the county-wide Breakfast Challenge, has promoted and assisted in schools transitioning their breakfast models.

However, costs associated with starting an alternative breakfast can sometimes deter schools as well. Costs involving staff time, equipment for carts or coolers, or materials associated with different models can seem risky to invest in. After initial investments into alternative breakfast models, reimbursements from the increase in student participation should cover those costs, but sometimes Nutrition Directors are unsure of the gains. Fortunately, as a way to alleviate that barrier to schools, several organizations have offered grants specifically for schools who convert their breakfast model. These grants range depending on the model and associated costs, but United Way of King County has offered grants up to \$6,000 for each school that is transitioning to an alternative breakfast service model. Please see the [\*\*Resources\*\*](#) section in this guide for more information.

## Family Income Surveys: Best Practices for Best Results

The most frequent challenge mentioned among Nutrition Directors was the distribution and collection of Family Income Surveys. Family income surveys are an alternative way to collect individual income information that can be used for state and local funding sources. As stated previously, most federal funding, like Title 1 and E-Rate, accepts ISP numbers as a measurement of high need within a school. However, other funding sources at the state and local level – particularly Washington programs like Learning Assistance Program, National Board Bonus, K-3 High Poverty Funding, and State Funded Full Day Kindergarten – still rely on individual income data which most often comes from the Free and Reduced Meal applications families fill out.

OSPI has required any school district implementing CEP in Washington to distribute and collect Family Income Surveys. Family income surveys are forms similar to the Free and Reduced Meal applications but are intended to be simpler. They only require household size and total household income, the names and birthdays of children living in the house and attending school, and a parent signature with contact information.

Family income surveys should be sent only to the students who are not directly certified. Surveys that are returned are then coded correctly (depending on if the household income is at or below 185 percent of the federal poverty line) in CEDARS (the state database), along with students directly certified.

Family income surveys are not necessary from families of students that have been directly certified through participation in Basic Food, TANF, or FDPIR or who have been identified as foster youth, migrant youth, or youth experiencing homelessness.

However, family income surveys can be challenging to effectively implement at the school district level for the reasons listed below. The return rate of income surveys without intentional strategizing can be low and may impact academic funding.

Challenges with family income surveys may occur because:

- Families may be confused about the income survey because they have been told they do not need to fill out a Free and Reduced Meal Application out to receive free meals
- Complicated income surveys may ask unnecessary questions and be confusing for families to fill out
- Free meals are not dependent on a family filling out an income survey like the Free and Reduced Meal Application, so families may not understand the importance of the survey data to the school
- Funding for the survey cannot come from federal reimbursement funds used which means that schools need to use other funds to distribute and conduct outreach for the survey
- The income survey data is used through the Department of Education, not Child Nutrition. It can be difficult to get answers to questions about CEP and income surveys
- Processing the income survey by hand can take a lot of effort as many school districts do not have adequate software for processing the survey electronically

Best practices for increasing the number of families participating in the family income survey have been gleaned by district nutrition directors, child welfare advocates<sup>18</sup>, and OSPI<sup>19</sup>.

### The CEP Family Income survey

- Keeping the survey short and simple, with just the required information asked from the parents<sup>20</sup>
- Including a clear and succinct letter with survey so parents understand the use and importance of the survey
- Translating the survey into all of the languages that are spoken within the district and having translators available at beginning of the year events to help families understand the importance of the survey
- Having an online survey (like Highline Public Schools developed) that parents can fill out either at home or at events like Back to School nights, student conferences, or family event nights

### Distribution of the CEP Family Income survey

- Distributing the surveys with the new school year packets and transfer packets
- Sending income surveys directly to the student's home instead of with the child
- Distributing surveys and offering guidance to parents at Parent Teacher Organization meetings and Open Houses
- Utilizing school staff and teachers who interact directly with parents to encourage families to fill out the survey
- Sending out income surveys to families multiple times throughout the first month or so of school, with targeted follow up with parents that did not return the survey

### Collection of the CEP Family Income survey

- Robocalls to targeted families reminding them to return the survey
- Incentivizing teachers and school staff to encourage families in their class or school to return the completed survey
- Incentivizing families for the return of the survey; schools could hold a contest/ drawing for a grocery store gift card for all of the families in the school and a returned form could result in an extra entry into that contest/drawing

### Recommendations of Improving CEP Family Income Surveys

- Encourage the Department of Education to adopt a Family Income Survey that could be used once every four years to establish a "baseline" ISP number that reduces the burden on school districts
- Employ a "0" code on CEDARS for when a returned income survey does not qualify instead of the "00" code that is used for both unreturned surveys and surveys that do not qualify. This would allow for schools to better track who has not returned surveys.

<sup>18</sup> WA Children's Alliance published a great guide and synopsis: *Year One Implementation of CEP in Washington* (April 2015)

<sup>19</sup> OSPI has also published a [Family Income Survey Best Practices Document](#) on its CEP and Provision 2 Section.

<sup>20</sup> Check out the [Sample Family Income Survey](#) section for an example of a simplified version used in California.

## Financial Impact of CEP: Factors to Consider

In addition to the potential costs associated with academic funding sources and family income survey return, there are additional financial pieces related to CEP that schools should consider.

### Food Costs

When free meals are offered to all students, the expected result is that more students who previously paid reduced or full price will be eating school meals. With an increase in students eating, the amount of meals prepared and served will also increase. Food costs will rise simply because the amount of food purchased will increase.

However, because more meals can be claimed at the higher reimbursement rate, the increase in food cost will be covered, and could be even surpassed, by the increase in federal reimbursement. Additionally, as student participation grows with more outreach or transitions to alternative service models, schools could reinvest increased revenue to improve nutrition quality of the food they are serving. CEP schools can also then take advantage of Economies of Scale with increased food purchases.

### Labor Costs

More students eating means more meals will need to be prepared and served. Additional labor costs may incur as more staff members or more hours will be needed to prep and serve meals. However, some aspects of the meal service will become streamlined so although increased labor needs may occur, it could be offset by labor saved by the streamlined meal system. Nutrition staff will no longer need to process Free and Reduced Meal applications or track down incurred debts on students' accounts.

Additionally, as presented in the Food Cost section, an increase in student participation results in higher revenue from federal reimbursements. District nutrition services would benefit from that increased revenue to offset costs associated to providing school nutrition staff more hours. It is a win-win!

### Equipment or Facilities Costs

School districts with current low participation in school meals may find that with the increased meals being served, increased storage or equipment may be needed. Schools that normally operate a small breakfast service may require additional storage for the increase in breakfasts served. These costs may range due to the level of need at each school district and school. These costs, like the ones mentioned above, can be offset by increased revenue.

Most school districts report that any increased CEP costs including food, labor, and storage are met or exceeded with increased revenue!

## CEP Works! Case Studies

The many benefits of CEP implementation have positively impacted students and school districts across the county, state, and nation.

### King County Highlights

School districts in King County with current ISP schools include Federal Way Public Schools, Highline Public Schools, Kent Public Schools, Renton Public Schools, and Seattle Public Schools. Although CEP has been a process not without its challenges for many school districts, the benefits of the provision are clear!

**Federal Way Public Schools** was one of the first school districts in King County, along with Seattle Public Schools, to adopt CEP. Starting in SY 14-15, Federal Way now has nine schools participating. By pairing schools with very high ISP numbers with schools with slightly lower ISP number, the district has been able to receive almost full free reimbursement at the federal level (99 percent). Federal Way completes an extremely thorough processing of income surveys and direct certified students to ensure that they are maximizing the ISP percentages, and this process includes running a name multiple times through the school year through the direct certification list and looking up categorical eligibility of siblings. Adopting CEP has made the difference as schools no longer have to track down Free and Reduce Meal Applications and student participation has increased for both breakfast and lunch.

What are the benefits of CEP for Federal Way? Director Mary Asplund said it perfectly:  
**“It helps all children at school and is worth the work!”**

In the second year CEP was available in WA, **Kent Public Schools** adopted the provision in five elementary schools. Although collecting family income surveys proved to be a significant challenge for the district as many parents were confused about the form and often did not send it back, the results of CEP was an increase for breakfast and lunch participation! School staff members and principals are happy about the program, and non-CEP participating schools are even asking how they can join. The advice from Nutrition Director Thomas Ogg was to start the calculations of ISP early and make sure to clearly communicate with school leadership about the process of choosing schools.

### Washington State Highlights

In SY 2015-2016, 51 districts and 176 schools in WA were participating in CEP! A December 2014 Children’s Alliance questionnaire determining best practices found that 64 percent of implementing school districts had participation increases with CEP and that key reasons for implementing CEP included: simplifying administration, ending hunger in our schools, not harming state funding, learning of success in pilot state, and increasing of academic outcomes.<sup>21</sup>

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<sup>21</sup> Children’s Alliance, 2015. *Year One Implementation of CEP in Washington*.

Although there are several school districts with great success at district-wide implementation, the highlighted school districts below are ones that implemented CEP in a few of their eligible schools. District-wide implementation is not currently feasible for many King County school districts that encompass a mix of low socioeconomic schools and higher socioeconomic schools.

**Centralia Public Schools**, located in Southwest Washington, adopted CEP in six schools in SY 2014-2015. Since implementing CEP, school breakfast participation has increased by 10 percent and school lunch participation has increased by 8 percent. Through intensive work around the income survey where schools were sent weekly lists in October of students who had not turned the survey in yet, Centralia Public Schools was able to claim a 97% full free reimbursement rate. The district had to adjust staff hours and roles, increase storage capacity among the schools, and adjust breakfast times to best accommodate the increase of students eating. Overall, adopting CEP has led to district-wide benefits for students, staff, and the greater public community. Great work, Centralia!

With three elementary schools adopting CEP in SY 2014-2015, **Aberdeen School District** in South Central WA has seen its meal service streamlined and more students eating school meals. Student participation increased by 10 percent! Because more students eating meant an increase in federal reimbursement, the school district did not incur any financial losses with the increase of food and labor. District nutrition staff reported many positive results and are looking to expand CEP to other eligible schools throughout the district.

### National Highlights

CEP success stories are plentiful all across the country. Here are just a few:

**Port Huron School District** in Michigan has participated in CEP since SY 11-12 and was highlighted in a USDA blog post. Starting first with nine schools and then expanding to district-wide implementation, the school district has seen student lunch participation grow from 49 percent to 61 percent. In the same time, student breakfast participation has nearly doubled. The school district served more than 1.5 million federal reimbursable meals in SY 14-15, and the increase in students participating and “reduced overhead costs has resulted in an increase in revenue that the Food Services can utilize to improve overall meal service.”<sup>22</sup>

Implementing CEP in SY 14-15, **Danville Public Schools** in Virginia has seen a 10 percent increase in student breakfast and lunch participation. The school district was initially hesitant about implementing CEP in its schools because of assumed financial loss that would occur, but financial analysis actually showed that CEP would save the district \$60,000 in cafeteria expenses. Danville schools benefited from a reduction in stigma, streamlined applications, and elimination of unpaid meal charges. In addition, the district reported that they saved \$2,000 in postage and time processing Free and Reduced Meal applications.<sup>23</sup>

<sup>22</sup> USDA Blog, 2015. [“Community Eligibility: A Win- Win for Schools and Families in the Fight against Childhood Hunger.”](#)

<sup>23</sup> GoDanRiver.com, 2015. [“Fewer Danville students skipping meals with free meal program.”](#)

## CEP in King County

As stated previously, only 26 schools in King County have adopted CEP since the provision became an option for Washington schools in SY 14-15. The King County districts that currently have CEP participating schools include Federal Way, Highline, Kent, Renton, and Seattle.

Each school district in King County, however, has eligible schools that are not currently participating, and this means that there are students and schools that are missing out on the benefits of CEP. According to OSPI's *Eligible Local Educational Agency (LEA) CEP Report* published in May 2015, there are 103 eligible schools at 40% ISP or above from King County school districts of Auburn, Federal Way, Highline, Kent, Renton, Seattle, and Tukwila. Please note that these numbers are the most up-to-date data available, but ISP numbers are constantly changing. The most up-to-date numbers are found at Nutrition Services at the district level from each public school district.

### King County Data

ISP Level Range	Federal Reimbursement (based on lowest ISP in range)	Number of Eligible Schools in King County
40% to 44.9%	64% full "free"; 36% paid	32
45% to 49.9%	72% full "free"; 28% paid	25
50% to 54.9%	80% full "free"; 20% paid	16
55% to 59.9%	88% full "free"; 12% paid	9
60% to 62.49%	96% full "free"; 4% paid	7
62.5% or above	100% full "free"; 0% paid	14
<b>Total</b>		<b>103</b>

### School District Specific Data

King County School District	Number of Eligible Schools (at 40% ISP or higher)	Number of Current CEP Schools
Auburn	8	0
Federal Way	10	9
Highline	18	6
Kent	26	5
Renton	10	1
Seattle	26	5
Tukwila	5	0
<b>Total</b>	<b>103</b>	<b>26</b>

## Recommended Next Steps for Stakeholders

The first step of any successful advocacy of a new provision is awareness. It is critical that all involved stakeholders understand the basics of the program in order to adequately explain the benefits that it can bring to our schools and our communities. Awareness is especially needed to combat the myths and misconceptions that exist in King County around the costs associated with CEP.

It is encouraged that advocates and key players not only educate themselves on CEP but also on the importance of school meals in general on child hunger and the state of child hunger in the state.

### School District Nutrition Directors

Nutrition Directors in King County have a very important and complex role in providing school meals to thousands of children per day. Our Fuel Your Future partner school districts have been extremely supportive on the work of bolstering participation in federally funded child nutrition programs, and in that partnership, UWKC has gained excellent insight into the challenging work that they must accomplish to accommodate for federal standards and local funding issues to feed healthy, nutritious meals to our students.

#### Acquire Knowledge of CEP Process

Nutrition Directors should take every opportunity available to familiarize themselves with CEP and the potential impact that it could have on their schools and students. Although time is often a limited resource at the District Nutrition Services level, leadership should take advantage of well-created presentations and webinars about the provision. Particularly helpful resources are located on the [Resources](#) section and include webinars, fact sheets, and reports from leading national research and advocacy organizations.

#### Seriously Consider CEP in Eligible Schools

Nutrition Directors should consider seriously the eligibility of their schools and make efforts to move forward on implementing CEP in schools that is possible in. District Nutrition Directors with eligible schools should take advantage of the fact that Washington districts have been participating in the program for two years and should reach out to nutrition directors in the state and the county to discuss the program. School district Nutrition Directors that have implemented CEP in their districts should advocate and become a champion for this program for other school districts to take part in it.

District Nutrition Directors should also work to encourage OSPI and other state agencies to implement national best practices for policies and procedures relating to CEP adoption that have been utilized across the country and that make it more feasible for a school district to participate.

#### Promote and Celebrate CEP at the current CEP schools

Nutrition Directors should make sure that schools have the proper information and marketing resources to share with parents about the provision and the fact that all kids eat breakfast and

lunch at no cost. We've seen that some CEP schools in King County have not promoted the benefits of CEP to the parents and students which make it difficult for families to fully take advantage of CEP and free meals for their children. It also makes it difficult to showcase the maximum potential of CEP adoption in schools to encourage other districts to implement it.

Signage should be encouraged more in high traffic areas with parents like school drop off locations and the main office. Robocalls and flyers should be used to reiterate communication about the free meals promotions throughout the year, especially in schools with low student participation. This would be a good opportunity for schools to partner with local philanthropic and anti-hunger groups to develop marketing and outreach tools.

We should also be celebrating schools where CEP has been implemented for their successes in feeding more hungry kids and using them as examples of the benefits of CEP on students, staff, and nutrition services. This can be done through media releases, school websites, and parent blogs.

## **Office of Superintendent of Public Instruction (OSPI) - WA State Agency**

### **Help State Funding Sources Use ISP Data**

The potential financial loss of state and local funding sources remains a significant challenge to school districts participating in CEP. Federal programs, like Title 1 and E-Rate, have successfully adopted other measurements of poverty amongst schools. OSPI should make significant efforts to help educate and inform state and local funding sources at the Department of Education of the potential to use the Identified Student Percentage as a measurement form for high poverty schools. Other states, like Maryland and Arkansas<sup>24</sup>, have transitioned their state funding sources to better incorporate CEP data as a way of applying and receiving funding. OSPI's role in this transition would be essential to provide context to state and funding sources on the effectiveness of ISP data as an alternative to FRL data.

### **Expand the Application of Collected Income Surveys to A Base Year Applicable for Four Years**

Income surveys, although essential for identifying individual income information for state and local funding sources, represent a significant challenge to districts participating in CEP. In addition to encouraging state and local funding sources to have alternative measurements of high need in schools besides the FRL data, OSPI should work to ensure that data from income surveys could be used for longer than one year. California<sup>25</sup>, for example, has instituted that income survey data can be gathered once every four years and represents a "baseline year" that its state and local funding sources that rely on individual income data can use. Schools in CA only collect eligible student data through income survey once every four years and then collect income data for newly enrolled students in the intervening years.

OSPI should advocate for establishing an income survey process with a "baseline year" that can last for four years, allowing school districts to focus on distributing and collecting income

<sup>24</sup> USDA, 2015. "[Perceived Barriers to Community Eligibility Provision Implementation.](#)"

<sup>25</sup> California Department of Education, 2015. "[Community Eligibility Provision Facts.](#)"

surveys once per four year CEP cycle. This would reduce the application processing burden on the school district and would significantly decrease the challenge of administering and collecting those surveys each year a school participates in CEP. Additionally, this would be easier on families with students participating in these schools as well as decrease the confusion that occurs with families and filling out the individual income survey. New data on incoming students would still be collected during the intervening years, allowing for state and local funding sources to reflect changes in need amongst high-needs schools.

### **Provide More In-Depth Technical Assistance with Direct Certified Data**

A huge barrier to eligible school districts that have not implemented CEP is the task of identifying the ISP for schools and for school groups. Because ISP is a relatively new way to quantify poverty measurements, district Nutrition Directors may not know how to calculate the ISP number. Additional training or technical assistance may prove to be the essential difference between an eligible district in participating or not participating in CEP. This assistance, through workshops or individual one-on-one assistance, should take place in March before the April 1<sup>st</sup> data pull occurs and should include guidance for schools that use different software systems.

## **Legislative and Education Leadership**

### **Support CEP through Legislation**

State legislative leadership should follow the example of states across the country and adopt legislation that encourages CEP implementation. Legislation that allows school districts to use ISP data instead of individual family income survey data would be extremely effective in creating a more encouraging environment for school districts. Washington legislators could follow the example of Maryland, who introduced a bill that altered the way that state compensatory education funding was calculated, or Arkansas, who introduced legislative changes to allow state funding to be based on the FRL data from the year prior to implementing CEP for the first year to allow school districts to have a smoother transition into the provision.

State and local legislative leadership should also encourage high-needs schools eligible for CEP to adopt it. If attention and support from the legislature was given to CEP, school districts leadership would be more inclined to more seriously consider CEP. Legislative members could highly encourage all eligible schools with more than 50% ISP to adopt CEP, as this would result in 80 percent of meals claimed at the federal full “free” rate and 20 percent of meals claimed at the federal “paid” rate.

### **Encourage CEP through Written and Vocal Support**

Legislative leadership can positively create a supportive environment for CEP through written and vocal support. For example, the governor or state representatives can write a sample letter of encouragement to Nutrition Directors in eligible school districts. This has been done by Governor Bullock in Montana, a state boasting the highest take-up rates in the country.<sup>26</sup>

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<sup>26</sup> USDA, 2016. “Community Eligibility Provision: Managing and Outreach in Your Community.” Webinar on February 10<sup>th</sup>, 2016.

Having that support and positive messaging given could help push school districts consider more seriously the implementation of CEP.

### **Support CEP Implementation through Bridge Funding**

A major challenge to school districts adopting CEP is the potential loss of local and state academic funding. A potential way to help schools implement CEP with confidence would be the backing of local and state partners, like local governments, private businesses, or philanthropic organizations, to insure up to a certain dollar amount of loss. Although bridge funding may not be available for a major loss of academic funding, like Title 1 status of a school, it could allow school district a year of transition time to implement best practices around the family income survey. Small funding sources could be compiled to insure school districts up to a set amount that allows for any potential loss from a low return rate of family income surveys. The funds could come from a variety of community partners who are dedicated to seeing more schools adopt CEP and that the benefits of CEP for our hungry children outweigh the potential costs.

### **Support CEP Implementation through School District Encouragement and Resources**

School board members and district Superintendents play a huge role in encouraging nutrition leadership to adopt CEP in eligible schools. School board members in all of the King County school districts should acknowledge this influence and become more aware of the potential for CEP in their district. School boards should encourage and support their Nutrition Directors through the consideration of CEP and the implementation process.

## **United Way of King County**

### **Convene Stakeholders to Streamline Communication and Best Practices Around CEP**

UWKC plays a unique role as a convener of school districts, funding sources, AmeriCorps service members, and national and community partner organizations. UWKC should utilize its role to create more awareness of CEP to not only school districts but other stakeholder groups that have an interest in feeding more children in high-needs schools. Fostering stakeholder interest in CEP, whether that be at a local governmental level or amongst parents, will be crucial in ensuring that school districts feel the urgency and the push behind implementing this great provision. There are many considerations and challenges to take into account before implementing CEP, but UWKC can leverage its relationships in the community and amongst its stakeholder partners to ensure that CEP is presented as a viable and wonderful opportunity for our school districts to feed more hungry children.

Particularly, UWKC should convene a meeting with Nutrition Directors and OSPI to discuss CEP and optimize the timing of conversations about application and adoption of this provision. This could potentially become a CEP Stakeholders group where Nutrition Directors, state agencies, nonprofit organizations, and public officials gather to discuss challenges and strategies to successfully implement CEP in eligible schools. A model to emulate would be Virginia's

Breakfast Stakeholders group whose efforts have led to a 140 percent increase in eligible schools sites participating in their second year of implementation.<sup>27</sup>

### **Host County or Region-Wide CEP Workshop and Event before CEP Deadline**

UWKC should host an event in where Nutrition Directors in King County and related counties gather to learn about CEP implementation and adoption. This would be a follow up to the meetings that OSPI is having with individual school districts or the county meetings. This event could foster peer-to-peer learning where school district Nutrition Directors could share best practices and insight that they have gathering in implementing CEP. Additionally, OSPI could utilize the gathering of Nutrition Directors to highlight any changes to CEP or updates that have come from the federal level.

UWKC could also present information and best practices on alternative breakfast models and the success of its Fuel Your Future program in assisting the transition of breakfast models in King County schools. This could be a critical time to recruit schools considering CEP adoption for the Fuel Your Future program and, therefore, maximizing the potential increase of student participation in school meal programs.

### **Consider Leveraging Funding Sources to Support Bridge Funding Efforts**

UWKC plays a critical role in connecting funders and financial support to community organizations throughout King County. UWKC should leverage these relationships to build and encourage the use of bridge funding to help support eligible but hesitant school districts to adopt CEP. This could be through a matching fund with a local government, like the Seattle City Council, to insure that CEP is a win-win for students and school districts alike.

### **Continue to Push Alternative Breakfast Models in High-Needs Schools**

UWKC's work of encouraging alternative breakfast models through the Fuel Your Future Initiative has been instrumental in transitioning schools to adopt these models to feed more children breakfast. However, a majority of schools in King County districts continue to serve traditional breakfast in the cafeteria, meaning that participation rates have remained stagnant. Efforts like the county-wide Breakfast Challenge and Breakfast After the Bell legislation are absolutely essential to creating awareness and possibilities for schools to implement alternative breakfast models. However, these schools will need individualized attention and assistance in implementing alternative models that work best for the logistics and students within their schools.

UWKC will need to continue and bolster their consulting and implementing role in assisting schools with these transitions. Additional staff or partnerships for increase capacity may need to be secured to provide these schools with additional help in transitioning their model. This additional capacity will be essential especially with CEP eligible schools as CEP provides the optimal environment for alternative model implementation.

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<sup>27</sup> USDA, 2016. "Community Eligibility Provision: Managing and Outreach in Your Community." Webinar on February 10<sup>th</sup>, 2016.

## Community Partners and Child Welfare Advocates

### Targeted Community Outreach

Partner organizations that work with income eligible families should become familiar on the connections between school meals and participation in assistance programs like Basic Food, TANF, and FDPIR or experiences with homelessness, foster care, and migration. These organizations should educate their clients and program participations of the benefits that these programs could provide, both with direct assistance and also for direct certification into the school meal programs.

Outreach and education to dispel some of the myths around program participation could increase the number of families utilizing these programs, especially populations that face multiple barriers of access including language, legal status, understanding of the program, and lack of transportation. Partner organizations, like those in the WithinReach Basic Food network, should target neighborhoods around schools that have low ISP numbers but high Free and Reduced Lunch (FRL) percentages.

### Encourage or Financially Support Eligible School Districts to Consider the Provision

Further community and district-level support for school districts to adopt CEP could encourage them to more seriously consider the provision. This would particularly be for schools that are eligible but do not have a high-enough ISP level for the Nutrition Director to prioritize CEP in that school. Public school district leadership, like the School Board, or governmental agencies, like the City of Seattle, could provide initial funds for schools implementing CEP to cover a portion of the meals that are not reimbursed at the full free federal reimbursement level. This could allow a school to get a CEP program started and then work on increasing student participation in the program through more streamlined opportunities for Breakfast After the Bell.

### Encourage the creation of CEP expert positions in King County

Nutrition Directors who are considering the implementation of CEP may need assistance in fully understanding the program and how to calculate their eligibility. Unfortunately, that need is not being met by current structures and support systems. It is imperative that Nutrition Directors feel adequately supported in this consideration and adoption of CEP.

Child welfare advocacy groups and nonprofit organizations should partner together to create a position for a CEP expert to work in King County. This could be an extension of the work done in the CEP Stakeholder group as recommended in the UWKC section. This person(s) would be tasked with walking school districts with eligible schools through the process of considering CEP and the steps necessary to prepare for CEP implementation. This position could be housed within a school district or an advocacy organization and used for direct and technical assistance as well as education of the CEP process.

## Parents

### **Advocate for CEP Implementation and Alternative Breakfast Service Models at their Child's School**

Of course, aside from state and local leadership and organizations, parents have a huge role to play in CEP adoption and support! Parents at CEP schools should encourage their children to eat school breakfast and lunch and spread the benefits of school meals with their peers. Parents at eligible CEP schools that are not currently adopting CEP should advocate for CEP implementation and voice their support for more kids getting access to school meals for free.

Because the combination of alternative breakfast models (like Breakfast After the Bell) and CEP is the game changer for more kids eating, parents should advocate for alternative breakfast models in both CEP and non-CEP schools.

### **PTAs should Leverage Parent Connections to Support Successful CEP Implementation**

Parent Teacher Associations (PTAs) at CEP schools should ensure that all parents know that all students are able to receive free meals, regardless of their free or reduced enrollment. PTAs at these schools should also leverage their parent connections and their support to school districts in the distribution and collection of individual income surveys.

*“What came to my mind is that food and eating should be an inherent part of the school. Just like the lights and classes. Everything. It should be built into the school day. When a kid comes through, they should not have to worry, ‘Are we going to eat.’ Or ‘Do we have enough to eat?’ No... It’s automatic. ‘We are going to have some food.’ The food is so good, it will draw them to class. ‘[It will] compel me to come to school. I can interact and eat something nutritious and talk about it with the person next to me.’ I think that we got it all wrong for even charging for school lunch and breakfast. They ought to be ashamed of themselves. It should be built into the school.”*

*- Parent from Neely O’Brien Elementary School, Kent Public Schools*

## The CEP Process: Steps to Take

There are many critical steps to take in considering the feasibility of and implementing CEP in a school or school district.

### Step 1: Determine Eligibility of Schools

Eligibility for implementing the CEP program is found through the Identified Student Percentage (ISP) number. This ISP data is found by downloading the state agency's Directly Certified list of students whose families are enrolled in Basic Food, TANF, and FDPIR programs; sorting the files by program; matching students who live in the same household for categorical eligibility; and then adding in students who are migrant, foster youth, and homeless.

The school district should use the official data pulled on April 1<sup>st</sup> while considering whether or not to implement CEP. Schools must have an eligibility of 40% ISP, and this number cannot be rounded.

### Step 2: Calculate Free/ Paid Reimbursement Rate

Because the financial impact piece is key to many Nutrition Directors' decision to adopt CEP, it is important to first find the full "free" reimbursement rate that the district will receive for the four year cycle. This can be found by first calculating the ISP and then multiplying it by 1.6 (the current federal multiplier).

For example: School A has an ISP of 55.7%. Multiplying it by the federal multiplier (1.6) becomes 89.2%. Which means that 89.2 percent of meals can be claimed at the federal full "free" reimbursement level and 10.88 percent can be claimed at the federal paid reimbursement level.

Remember, a school with an ISP of 62.5% results in a 100 percent full "free" reimbursement level. This is because 62.5 multiplied with 1.6 (the federal multiplier) is 100.

After the free/paid reimbursement levels have been established, Nutrition Directors should assess the financial impact by looking at average meal participation in their breakfast and lunch programs as well as account for any expected increases in participation because it will make participation more feasible for students not currently receiving free or reduced lunch. There are several calculators that exist to determine the financial impact of CEP on a school district or group of schools, including No Kid Hungry<sup>28</sup> and USDA.<sup>29</sup> The only limitation of these to King County and WA specific schools is that they may not account for extra state or district-wide reimbursements for free and reduced meals.

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<sup>28</sup> No Kid Hungry has a great calculator for determining the financial impact of CEP:  
<https://bestpractices.nokidhungry.org/school-breakfast/community-eligibility-1>

<sup>29</sup> USDA also has a CEP calculator that is located on their CEP Resources Center: <http://www.fns.usda.gov/school-meals/community-eligibility-provision-resource-center>

Specific Nutrition Directors in King County have shared that the optional full “free” reimbursement level would be around 90 percent and that anything lower would not be feasible for CEP implementation. However, there is not a lower limit on the free reimbursement ratio, because even with an ISP of 40% (the minimum for eligibility), the reimbursement that is claimed is at 64 percent full “free” and 36 percent paid federal reimbursement levels.

### **Step 3: Determine Groupings of Schools**

Eligible schools can be grouped into a larger group where there is a combined ISP that is used for all of the schools in the group for the four year cycle. Grouping schools is advantageous in getting more schools to participate because it can allow a school with a higher ISP to bring in schools with a lower ISP amount to receive a higher reimbursement level. Grouping also allows for more streamlined practices amongst multiple schools and the opportunity for school staff to share best practices of things like distributing the income survey.

If changes occur that require that group changes (either a new school decides to elect CEP or a CEP school decides to stop with the program), the ISP level for the grouping must be recalculated. In any case of a change in the grouping, the four year cycle would begin again with the new ISP rate used for the federal full “free” and paid reimbursement levels.

However, eligible schools can also individually adopt CEP, without having to be grouped with other schools. This would be advantageous in that smaller groups or single schools would not require as much calculation work to resubmit ISP numbers for a higher reimbursement rate.

### **Step 4: Notify OSPI of your interest and begin the CEP application**

Once it has been determined that CEP adoption is feasible, notification to OSPI should be given by the deadline of June 30<sup>th</sup>. The online application can also be started and will require ISP data and calculations for each school participating, school population data, and proposed meal counting procedures.

### **Step 5: Communicate with School and Nutrition Staff Early**

Once it has been decided that CEP is feasible to implement and the application has been started, communication is key. After you have notified OSPI of your intention to adopt CEP by the deadline, the next big step is creating awareness and education about this provision and the impact that it will have on individual schools and the school district as a whole.

It is important that school staff and nutrition staff understand what changes will occur with the adoption of this new program, and it is really important to do this early. There may be alterations that schools might need to make to implement CEP at its fullest potential, like transitioning to alternative breakfast models. This communication might begin CEP presentation for the School Board and then the principals and head nutrition staff of all of the school adopting CEP in the district. It will be critical to get their support and buy into the program before you move on to other stakeholders.

It is also important that the process of selecting schools is made extremely clear to all related stakeholders, even those who aren't going to be directly involved with the CEP process. Misconceptions about eligibility or ISP numbers may be confusing for principals or other stakeholders who want to participate in the program, and it will be important to address these myths and misconceptions early on.

### **Step 6: Educate Parents and Students about the Process and Income Surveys**

Communication with parents will prove to be as essential as with principals and lead nutrition staff. Because there are changes that will require parents to fill out individual family income surveys, it will be critical that adequate explanation of the surveys and CEP as a program is given.

This is especially important for parents who have multiple children at different schools. For parents whose children are not automatically directly certified for free and reduced school meals, this means that they will need to fill out a Free and Reduced Meal application for the children attending a non-CEP school. Because this could be confusing, very clear explanations of the programs are needed. Also, if a student transfers from a CEP school to a non-CEP school and is not directly certified, the parents should be aware that they must fill out a Free and Reduced Meal application for their child to receive free or reduced school meals.

Families cannot be told that free meals are dependent on the return of a family income survey, but incentives and targeted outreach can and should be used to maximize the number of returned income surveys. Best practices for income surveys can be found in the **Family Income Surveys Best Practices** section.

### **Step 7: Consider Alternative Breakfast Models to Increase Student Participation**

As mentioned previously, adoption of CEP does not automatically result in increased rates of student participation. In order to maximize the potential benefits of CEP and feed more students, school districts should consider implementing alternative service models and promoting breakfast more. Nationally, districts that have implemented CEP with an alternative breakfast models have significantly higher rates of student participation than schools that just implement CEP with traditional breakfast models. In CEP participating schools in Illinois and Kentucky, the average increase of students eating breakfast was 25 percent and the average increase of students eating lunch was 13 percent.<sup>30</sup>

Schools and districts considering alternative breakfast models should take advantage of the **resources** and expertise in the county. UWKC, through its Fuel Your Future Initiative, deploys AmeriCorps members to King County schools to determine the most effective breakfast model for the logistics of the school, incentivize and market breakfast to students, and successfully transition breakfast models.

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<sup>30</sup> Food Research and Action Center, 2015. "[Community Eligibility Provision: An Amazing New Opportunity.](#)"

## Timeline of CEP and Things to Keep in Mind in the Process

A key piece of information relevant to CEP implementation is the timeline in which all of the decisions happen. There are a few dates to keep in mind:

- **April 1<sup>st</sup>** This is when ISP data is pulled for an eligible school or eligible school district wanting to apply for and adopt the CEP for the next school year.
  - It is critical that school districts practice pulling this data before the April 1<sup>st</sup> data pull because this will lead to a better understanding of the process and how to maximize direct certification.
- **April 15<sup>th</sup>** This is when the Office of Superintendent of Public Instruction (OSPI) notifies school districts of district-wide eligibility using proxy data and the school districts provide school eligibility data to the state agencies.
  - The proxy data is important to note as this information is not as comprehensive as the school data which takes into account the categorically eligible households and the students that are migrant, homeless, or foster youth.
  - It is also important to note that although the state agency is supposed to make a good faith effort to have the most updated data, the ISP data may have changed if any changes in population or participation in programs increased or decreased from when they originally pulled their data. This is why it is critical that school districts are pulling their own ISP data on the April 1<sup>st</sup> to make an accurate and informed decision on whether or not to implement ISP.
- **May 1<sup>st</sup>** This is when OSPI must post the list of eligible schools and districts on their websites and notifies FNS of the eligible schools. School districts then have until June 30<sup>th</sup> to decide whether or not they want to participate.
- **June 30<sup>th</sup>** (although it has been extended to later in August in the past) School districts must notify OSPI of their intention to participate as well as prepare their application with the data gathered on April 1<sup>st</sup>.
- **October 1<sup>st</sup>** Data is pulled from the CEDARS report for use of school academic funding.
  - This day is particularly important as it falls within the 30 day grace period for Free and Reduced Meal applications, meaning that students who received free or reduced meals last year but had not returned a free or reduced meal application this year are counted towards the school's free and reduced percentage used for academic funding.

Note: Although the advertised deadline for adopting CEP is June 30<sup>th</sup>, eligible schools can technically adopt CEP at any time during the school year.

## Simplified Family Income Survey Example

As noted in the 2015 Children's Alliance *CEP Conclusions and Recommendations* report, the most effective family income surveys are the simplest.

Below is an example of a simplified family income survey used in California.<sup>31</sup>

### PART I: Fill in the following information for a student living in your household

LAST NAME	FIRST NAME	BIRTHDATE (MM / DD / YY)	
		/ /	
SCHOOL (Write "NONE" if not in school)	GRADE	CLASSROOM	SCHOOL CODE

### PART II: Fill in the following information for Household size and Household Income

*See additional information on the back of this form for assistance in determining your household size and annual household income.*

**1. Circle the total number of adults and children living in your household:**

Circle one      1      2      3      4      5      6      7      8      9      10      Other \_\_\_\_\_

**2. Total Annual Household Income: \$**

### PART III: Parent or Guardian Information and Signature

*I certify (promise) that the information provided on this form is true and that I included all income. I understand that the school may receive state and federal funds based on the information I provide and that the information could be subject to review.*

\_\_\_\_\_  
Signature of adult household member  
completing this form

\_\_\_\_\_  
Printed name of adult household member  
completing this form

\_\_\_\_\_  
Date

HOME PHONE NUMBER

CELL PHONE NUMBER

E-MAIL ADDRESS




<sup>31</sup> This sample family income survey from California can be found at

<http://www.cde.ca.gov/fg/aa/lc/documents/sampleform4.doc>. Other great examples include one from Iowa which can be found at <https://www.educateiowa.gov/documents/cep/2014/04/household-survey> or one from OSPI found on the CEP Resources page at

<http://www.k12.wa.us/ChildNutrition/Programs/NSLBP/CommunityEligibility.aspx>.

## Additional CEP Resources

### General Fact Sheets

FRAC, 2014: "[Community Eligibility Provision: An Amazing New Opportunity.](#)"

USDA, 2015. "[Community Eligibility Provision Fact Sheet.](#)"

USDA, 2015. "[Community Eligibility Provision: Perceived Barriers to CEP Implementation.](#)"

### Resource Guides and Summaries

FRAC and CBPP, 2015. "[An Advocate's Guide to Promoting Community Eligibility.](#)"

FRAC and CBPP, 2013. "[Community Eligibility: A Powerful Tool in the Fight Against Child Hunger.](#)"

USDA, 2016. "[Community Eligibility Provision: Planning and Implementation Guidance.](#)"

### Funding Specific Information

#### Title 1

USDA, 2015. "[Updated Title 1 Guidance for Schools Electing Community Eligibility.](#)"

#### E-Rate

USDA, 2014. "[Updated E-Rate Guidance for Schools Electing Community Eligibility.](#)"

#### Financial Impact Calculators

No Kid Hungry, 2014. "[No Kid Hungry School Calculator.](#)"

USDA, 2014. "[CEP Estimator.](#)"

### Washington State and King County Specific Information about CEP

OSPI, 2014. "[Evaluating and Preparing for the Community Eligibility Provision.](#)"

#### Webinars

OSPI, 2015. "[CEP Technical Assistance Training Webinar.](#)"

OSPI, 2014. "[Community Eligibility Provision Webinar: Q and A.](#)"

OSPI, 2014. "[Introduction to Community Eligibility Webinar.](#)"

OSPI, 2014. "[Documenting Identified Students and Application Process.](#)"

#### Grant Funding for Alternative Breakfast Model Conversion

UWKC has one-time grants of \$5,000 for schools converting to a Breakfast After the Bell model of service. These funds may be used for a variety of costs associated with breakfast model conversion including equipment, staffing, advertisements, etc.

Action for Healthy Kids has one-time grants of \$2,500 for schools converting their breakfast model to an alternative model, including Breakfast After the Bell models.

## Focus Group Insight on CEP/ Universal Breakfast Programs

Parents in the Fuel Your Future focus group series held in Winter 2015-2016 were very in tune to the fact that the cost of school meals can be a barrier for families who do not qualify for the free and reduced meal program but are still living on limited resources. In the same way, they understood the stigma that is associated with a child who does qualify for free or reduced program. Many parents felt that school meals, and particularly school breakfasts, should be provided to all students, regardless if they qualified for the program.

Roxhill Elementary, Seattle Public Schools, had previously benefitted from Universal Breakfast where all of the students, regardless of enrollment in the free and reduced meal program, could access breakfast at no cost. One parent remembered how beneficial that program was for the overall school community and advocated for the return of that program.

*“I know two years ago we had free breakfast for everyone, but it went away last year. I asked why but I never got an answer. I know it wasn’t a funding issue. I know that it was something that had to be filled out, and they had to keep doing it every year. I never got an answer on why it wasn’t done. But I know our other principal tried really hard to get it here and keep it here. I liked it even though my kids weren’t eating here, and I did see a lot more kids eating than I do now. Now I see less kids eating breakfast. I would see pretty much the whole half of the cafeteria with kids eating breakfast was full and now it is opposite. So I would like to see that come back.” – Roxhill Elementary Parent, Seattle Public Schools*

Some parents thought that it was just natural for free, nutritious school meals to be integrated into the school environment.

*“What came to my mind is that food and eating should be an inherent part of the school. Just like the lights and classes. Everything. It should be built into the school day. When a kid comes through, they should not have to worry, ‘Are we going to eat.’ Or ‘Do we have enough to eat?’ No... It’s automatic. ‘We are going to have some food.’ The food is so good, it will draw them to class. ‘[It will] compel me to come to school. I can interact and eat something nutritious and talk about it with the person next to me.’ I think that we got it all wrong for even charging for school lunch and breakfast. They ought to be ashamed of themselves. It should be built into the school.” – Neely O’Brien Elementary Parent, Kent Public Schools*

Other parents connected free meals for all to be more conducive for a better learning community.

*“It is impossible for any child to learn when you are hungry. When you are real hungry, that’s the only thing that you can think about. You aren’t worried about math or reading or anything. ‘Feed me.’ Because of that I believe in free meals for every child regardless of income. Not only because of the importance, but because of the stigmas... No child should be punished because they are poor.” – Roxhill Elementary Parent, Seattle Public Schools*

*“I know certain schools in this district provide free meals to all students and this year, Kent Elementary, it’s a pilot program. No student, in any district, no matter what grade you are in, should have to worry about how much I’m going to have to pay for this lunch or breakfast. And*

*their parents shouldn't have to worry about how to pay for the lunch, because we don't get free or reduced."* – Neely O' Brien Elementary Parent, Seattle Public Schools

Some parents focused on the important role that school meals play for families with limited resources.

*"There may be some households where that may be the only meal. They try to make things stretch and they may not get enough and so it is good that there is breakfast available at school. At any rate. Because there are households that can't afford enough food to make it stretch."* – Renton Senior High Parent, Renton Public Schools

*"What hurts me, if my grandson doesn't have enough time to eat, he comes home hungry. I don't get food stamps for him, I don't get anything, just my SSI. It is hard if I don't have any bread, I try to keep top ramen. He comes home and is really hungry, and I ask if he ate, he says that he did but that there wasn't enough time to eat. So a lot of time that makes it hard on me. A third of the month I can get stuff, but how long does it last? I'm not one of those fortunate ones where I can buy a lot of stuff. I have to make it last for the entire month. I just don't want him to think that he can't have nothing. Most of his milk is from school. We rely on the free breakfast and the reduced that I pay for his lunch."* – Cedarhurst Elementary Parent, Highline Public Schools

*"With some families, the family size is really big, with 7 or 8 people. We are like a lot of refugee families, and they have to prepare a lot of food for breakfast and lunch for the small little kids. And so the [school meal] program is a benefit for those big families who have a lot to feed, to save time for them and less money to spend on food. It makes a difference."* – Showalter Middle School Parent, Tukwila Public Schools

Other parents highlighted the immense stress and stigma that comes along with students from families with limited financial resources accessing school meals.

*"Just shows even though sometimes we think kids are too young to think about how much things cost, they aren't. They think about every single thing. They see it, they hear it. Even we are trying to hide it from them. So the kids that do pay for lunch and breakfast, they are afraid of going over the limit, especially since when they are running low on funds, their parents don't get a call. Instead, they are the messenger. That is making them think twice before they go get a lunch. 'Is this the time that this that they will give me the note where tell me I have to pay money?' I have seen kids who punch in their number and as soon as it says, 'Thank you!', they sigh and walk away. That's a lot of stress on them, also to be putting them in that situation where they know how much money they have or how much money they owe. Just them having to think about that, worry about that, it does cause them more stress and makes it less likely to get breakfast."* – Roxhill Elementary Parent, Seattle Public Schools

## Definitions

**Alternative Breakfast Model:** a model of serving breakfast that differs from serving traditional breakfast in the cafeteria where students eat breakfast before school starts. Alternative breakfast models include Breakfast in the Classroom where students eat breakfast in class as part of the school day; Grab and Go where students take breakfast from either the cafeteria or outside kiosks and eat it before and on the way to class; or Second Chance where students access breakfast after first period during an extended passing period

**Basic Food:** Washington's Supplemental Nutrition Assistance Program (SNAP) which provides food assistance to families and individuals that have an income and household size at or below 200 percent of the Federal Poverty Line (FPL) . Nationally, SNAP income guidelines are set at 185 percent FPL, but WA state provides the extra funding to cover families that are slightly above the national income guidelines

**Breakfast After the Bell:** a national best practice model of serving school breakfast to students in a way that incorporates it as part of the school day. See **Alternative Breakfast Model** for more details.

**Community Eligibility Provision (CEP):** a meal provision created through the Healthy, Hunger-Free Kids Act which allows eligible high-needs schools to provide free meals for all students, regardless of their enrollment in the Free and Reduced School Meal program. Unlike traditional meal provisions, federal reimbursement for CEP schools is determined by the Identified Student Percentage (ISP) number.

**Direct certification:** the process in which a student is enrolled in the Free and Reduced Meal program because of their families' enrollment in Basic Food, TANF, or FDPIR. Direct certification systems and processes differ by state agency, and the effectiveness of matching state program data and school data is critical in ensuring that the maximum number of students are directly certified for free meals and, therefore, that schools can have the highest ISP number possible

**Directly certified students:** students that are matched in the direct certification process and who are automatically enrolled in the Free and Reduced Meal program without filling out a Free and Reduced Meal Application

**E-Rate:** a federal program that provides high-needs schools with telecommunication funding and discounts; funding had traditionally used Free and Reduced Lunch (FRL) participation numbers but recent updates now allow ISP data to be used instead of FRL data

**Family Income Surveys:** surveys that collect individual family income levels and are a simpler alternative to Free and Reduced Meal Applications for collecting family income data

**Federal Reimbursement:** the amount reimbursed by the federal government per meal served in the School Breakfast Program and National School Lunch Program. Current reimbursement federal reimbursement levels for SY 15-16: severe need breakfasts at \$1.66 (free) and \$.29 (paid); severe need lunches with 60% FRL at \$3.09 (free) and \$.31 (paid)

**Federal Multiplier:** the number that is used to determine the federal reimbursement rate of CEP for a particular CEP eligible school or group of schools. The number is currently 1.6 but could range from 1.3 to 1.6. There are no current plans for changing the use of 1.6 as the multiplier

**Food Distribution Program on Indian Reservations (FDPIR):** a federal food assistance program that provides USDA foods directly to income eligible households

**Free and Reduced Meal Application:** an application that families must fill out with their income level, household size, personal information, and students enrolled to receive school meals either for free or at a reduced cost

**Free School Meals:** meals that meet the nutritional standards of school meal programs and are provided at no cost to students with families at or below 135 percent of FPL

**Healthy Hunger-Free Kids Act (HHFKA):** the 2010 Congressional reauthorization of the Child Nutrition Act that established improved nutrition standards for school meals, slightly increased federal reimbursements for school meals, and enacted the Community Eligibility Provision

**Identified Student Percentage (ISP):** the percentage of students in a school or district that are direct certified divided by the total amount of students in a school or district; ISP is used to determine the federal reimbursement rate of meals claimed at the full “free” and paid level

**Paid Meals:** meals that meet the nutritional standards of school meals programs and are provided at a set cost to students with families above 185 percent of the FPL

**Reduced School Meals:** meals that meet the nutritional standards of school meal programs and are provided at a reduced cost (no more than 40 cents for lunch and 30 cents for breakfast) to students with families at or below 185 percent of FPL

**School meals:** the meals served in the School Breakfast Program (SBP) and the National School Lunch Program (NSLP). These meals are served at the school, federally funded through a reimbursement system, and are a critical piece in the approach to fighting child food insecurity

**Temporary Assistance for Needy Families (TANF):** a federal program administered by the states that provides cash-aid, job training, and childcare assistance to income eligible families

**Title 1:** a federal program that provides extra academic funding for high-needs schools to ensure that all students are achieving high academic standards

## Organization Acronyms

**CBPP:** Center for Budget and Policy Priorities

**FRAC:** Food Research and Action Center

**OSPI:** Office of Superintendent for Public Instruction

**USDA:** United States Department of Agriculture

**UWKC:** United Way of King County