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## Challenges of the Community Eligibility Provision of the National School Lunch Program: A Conversation about the Poverty Indicators in Education Working Groups

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## *Policy Brief*

# **Challenges of the Community Eligibility Provision of the National School Lunch Program: A Conversation about the Poverty Indicators in Education Working Group**

**Tara Thomas  
Devon Brenner**

Under the National School Lunch program (NSLP) schools receive funding to support the cost of school meals for children whose families meet certain income eligibility requirements. NSLP ensures that children from low-income families receive balanced nutrition during the school day and supplements the cost of purchasing, preparing, and serving school meals. Historically, families must complete paperwork each fall showing that they qualify for either free or reduced-priced lunch based on family income. Over time that system of qualifying for free or reduced price lunches has become a way of approximating the rate of children living in poverty in a given school or district, and rates of free and reduced priced lunch participation have been used for numerous policy, reporting, and research purposes. Over the past 10 years, many districts have moved to a different method of participating in the NSLP: through the Community Eligibility Provision, which does not require the collection of free and reduced price lunch (FRPL) applications, impacting the accuracy and accessibility of FRPL data. The National Rural Education Advocacy Coalition (NREAC) and AASA: The School Superintendents Association and have convened to make recommendations about how to address the increasing loss of FRPL data. Devon Brenner, one of the editors of *The Rural Educator*, recently spoke with Tara Thomas, Policy Analyst for AASA and NREAC and manager of the Poverty Indicators in Education Working Group to talk about the CEP and why the option to use community eligibility to access federal funding through the NSLP is a policy that matters for rural schools.

**Brenner:** What is the Community Eligibility Provision (CEP)? How does it help more children have access to school meals and adequate nutrition?

**Thomas:** CEP is a way of participating in NSLP that doesn't require the collection of applications from

families and serves meals to all students at no cost. The way it works is based on an Identified Student Percentage (ISP) which is determined through a process called direct certification which most district leaders are already familiar with. Direct certification is the process of matching data from existing programs such as SNAP, TANF and in some states Medicaid. If a student is already enrolled in those programs, then they are automatically eligible for FRPL. (It is important to note that most schools, not just CEP schools, use Direct Certification for students.)

The number of students who are able to be directly certified creates an Identified School Percentage for a school or district. If districts have at least 40% ISP, they can participate in CEP—and provide meals to all students for free.

**Brenner:** Why does it matter if more and more schools are participating in CEP? How are FRPL rates currently or typically used in education?

**Thomas:** Besides the ability to provide universal school meals, the other great thing about CEP is that schools no longer have to participate in the onerous, burdensome process of collecting FRPL forms—which is becoming increasingly more difficult as schools transition back from the universal meals they were able to serve during the pandemic.

However, the flip side of that means schools/districts that participate in CEP no longer have FRPL data. And while schools can instead use the directly certified numbers, that data will identify fewer students than the traditional FRPL application process would identify. Relying on CEP, means that some students from low-income families that do not or cannot participate in the social safety net programs may be left out. This could be students from undocumented or mixed status families, students in states with stringent work requirements or other

eligibility requirements for public benefit programs, or students from families with limited literacy or English proficiency, inability to prove income or face other barriers to participating in the programs.

**Brenner:** So when schools rely on direct certification, eligible students might be overlooked. This is important because schools might not achieve the 40% Individual Student Percentage and so might not qualify for CEP?

**Thomas:** Yes, that's correct. And there is another important concern. When schools qualify for CEP, the percentage of students that can be direct certified get reported, and so the data undercount the number of families living in poverty. States and districts rely on FRPL eligibility rates for many purposes: Some states use FRPL in their funding formulae to allocate dollars to economically disadvantaged students while many districts rely on FRPL data to allocate Title I dollars to the schools in their district. Additionally, FRPL data is used for accountability. The loss of this data has significant consequences for education.

**Brenner:** And so this matters for education in lots of ways. Why does a lack of availability of FRPL data matter for rural education in particular? Is this information uniquely important for rural schools and districts?

**Thomas:** Currently, the other prominent measure for economically disadvantaged students is the Small Area Income and Poverty Estimate (SAIPE) which is based on Census data. Historically, census data is less reliable for rural areas making the loss of FRPL data even more consequential.

**Brenner:** This also seems like it would have important consequences for education research—when researchers are investigating whether an intervention or program is effective for low-income students or when researchers want to evaluate the impact of a policy on rural schools that serve low-

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income families, we often look to the FRPL rate of a district. CEP provides less nuanced information about rates of family poverty in a school or a district.

**Thomas:** Right. FRPL is not a perfect indicator of poverty rates, but it's one that policy makers and researchers are used to using, and with CEP it is even less of a useful indicator for all kinds of uses.

**Brenner:** You have convened the Poverty Indicators in Education Working Group to examine FRPL and CEP and to make recommendations about alternatives to using free and reduced lunch as an indicator of rates of students in poverty. Can you tell us more about that working group?

**Thomas:** The working group is led by AASA, The School Superintendents Association, the Food and Research Action Center (FRAC) and First Focus on Children. The working group aims to bring education advocates together to discuss what alternatives exist and advocate for Congress to take action on the issue.

**Brenner:** Has the working group already begun to imagine alternatives to the FRPL rates as an indicator for policy and research purposes?

**Thomas:** To kick off this work, we hosted a series of webinars to provide foundational knowledge to all those interested. The third webinar went through the current alternatives to FRPL that some states are using and the pros and cons of each. We discussed CEP data, income tax data and Census and American Community Survey (ACS) measures. Those interested can watch the webinar recording at <https://tinyurl.com/mrymk23n>.

**Brenner:** If people want to learn more or get involved, what should they do?

**Thomas:** Those interested in this work are welcome to reach out to me at [tthomas@aasa.org](mailto:tthomas@aasa.org).